

REFERENCE: P/24/39/FUL

APPLICANT: Red Property Ardwyn House, Hendre Road, Pencoed, Bridgend, CF35 6PR

LOCATION: 11 Park Street Bridgend CF31 4AX

PROPOSAL: Change the first floor from short term lets (use class C6) to 7 bed HMO (sui generis) and retention of 3 separate short term let units on ground floor (use class C6)

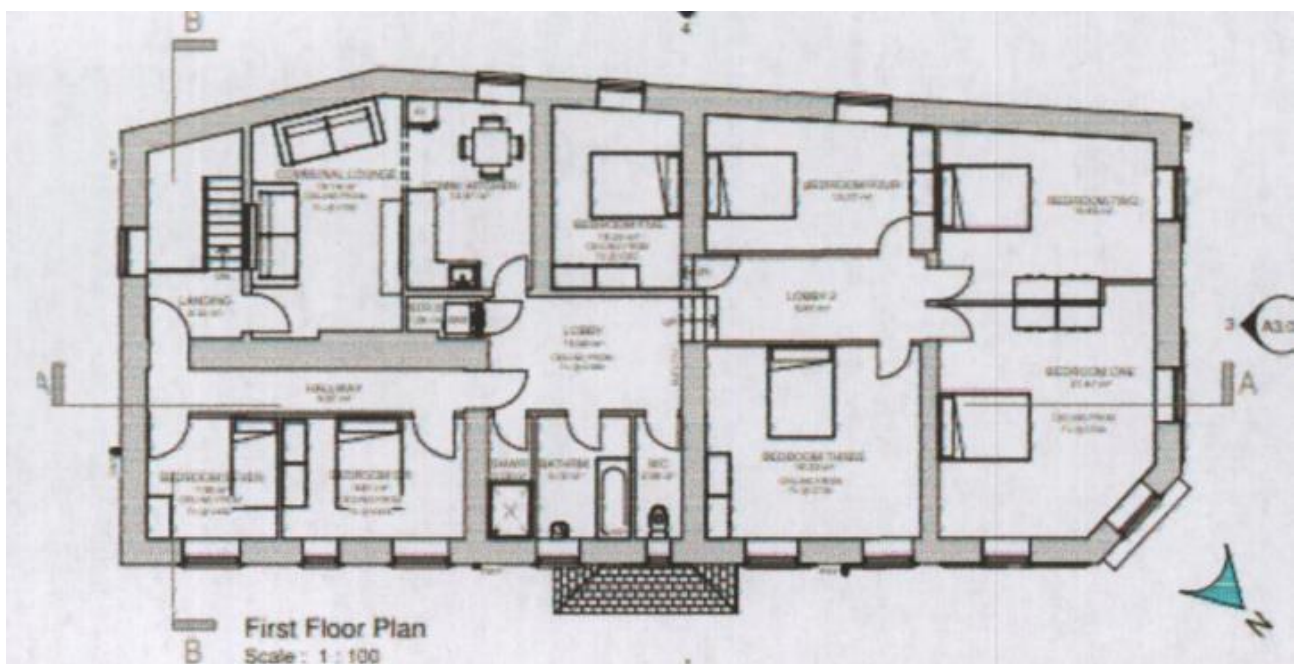
RECEIVED: 19 January 2024

DESCRIPTION OF PROPOSED DEVELOPMENT

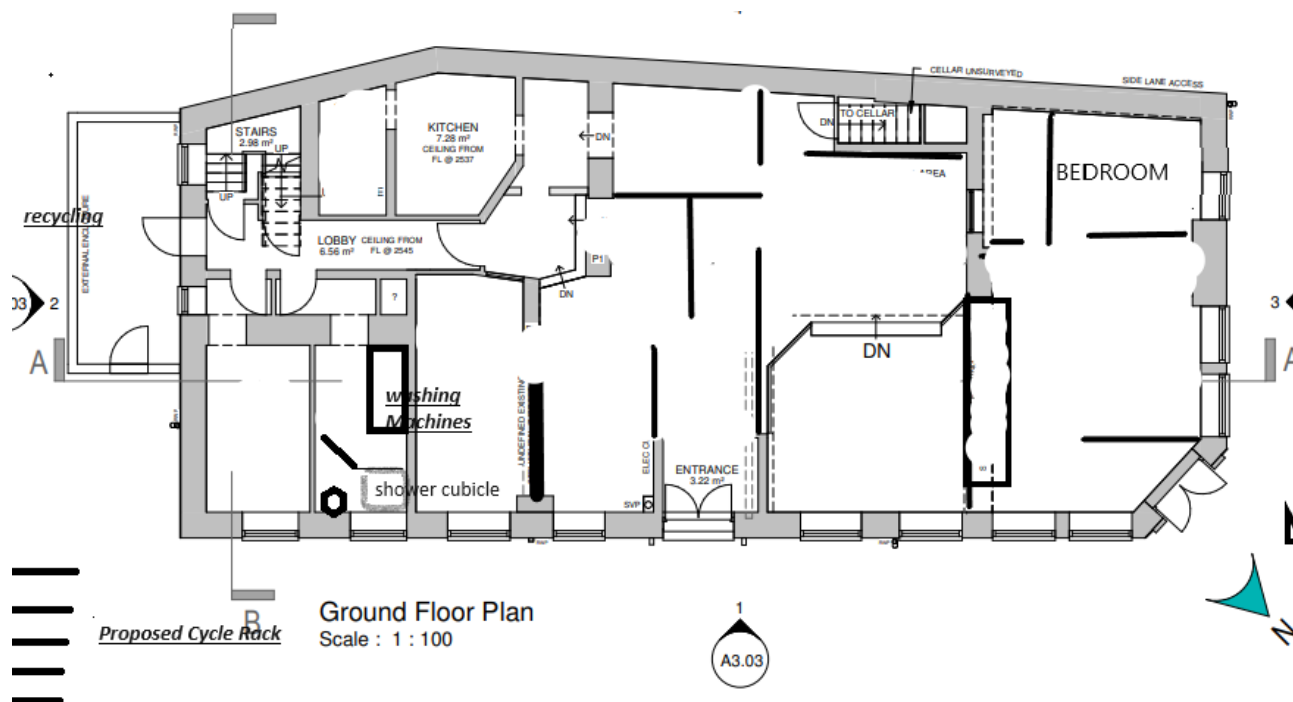
Retrospective planning permission is sought for the change of use of the first floor of 11 Park Street from Use Class C6 (short-term lets) to sui generis (7-bed HMO), as defined by The Town and Country Planning (Use Classes) (Amendment) (Wales) Order 2022.

The site has historically been used as a public house as well as other uses within the A3 Use Class. Since March 2021 it has been used as short-stay accommodation, with individual rooms to rent on a short-term basis including for people working within Bridgend, at the Princess of Wales Hospital and those in need of temporary housing.

The Application does not seek to make alterations to the approved use for short-term lets at the ground floor level of the building.



Proposed first floor plan



Ground floor / Site Plan

The existing consent for the first floor of the building allows for 7 bedrooms and shared facilities to be used on a short-term basis (maximum stays of 31 days). The proposal will utilise the same internal layout, albeit seeks to extend the time for which residents can stay in the property from 31 days – as such providing more permanent accommodation.

The 7 bedrooms at first floor level will benefit from shared facilities including a shared living area, two kitchens, clothes washing / drying facilities and bathrooms on both levels of the building. Three showers and three toilets are proposed across the ground and first floor to serve the residents.

No external changes are proposed to the building other than the provision of cycle parking facilities to the front of the property.

RELEVANT HISTORY

Application ref.	Description	Decision	Date
P/00/569/FUL	Reinstate entrance door plus interior refurbishment and wc refurbishment	Unconditional Consent	27/07/2000
A/01/8/ADV	Illuminated wall and projecting sign	Conditional Advert Consent	11/04/2001
A/13/39/ADV	Erect 2 fascia signs	Conditional Advert Consent	13/08/2013
P/11/690/FUL	Part change from restaurant to general store.	Unconditional Consent	14/10/2011
A/11/10/ADV	Fascia signs	Conditional Advert Consent	20/04/2011
P/12/426/FUL	Change of use from A3 (food and drink) to D1 non residential	Refused	06/08/2012

SITE DESCRIPTION

The Application site is situated within the Primary Key Settlement of Bridgend, as defined by Policy SF1 of the adopted Local Development Plan (2024). It is situated within the Newcastle Hill Conservation Area as well as in a defined Archaeologically Sensitive Area (Policy SP18).

The site comprises a two-storey building which occupies a relatively prominent position due to its proximity to the junction of Park Street and Tondu Road – two main roads within/ surrounding Bridgend Town Centre. As indicated above, prior to its change of use to provide short-term lets, the site has historically been used as a public house, as well as other uses within the A3 Use Class.



Photograph of site's front elevation

The property is situated within a pedestrianised area with access to the building gained using a doorway on its front (northern-eastern) elevation as well as a second door on its northern corner.

PUBLICITY

The Application has been advertised on site. Neighbours have been notified of the receipt of the Application. The period allowed for response to consultations/publicity expired on 16th April 2024.

CONSULTATION RESPONSES

Cllr S Bletsoe – Objections to the Application for the following reasons:

- Over intensity of HMOs in the area;
- Lack of parking provision;
- Concerns regarding the internal facilities within the building to serve the future residents of the HMO.

Cllr T Wood – Objections to the Application for the following reasons:

- Over intensity of HMOs in the area;
- Lack of parking provision;
- Concerns regarding the internal facilities within the building to serve the future residents of the HMO.

Neighbourhood Services Officer (SRS) – No objection.

South Wales Police Designing Out Crime Officer – No objection.

Natural Resources Wales (NRW) – Given the extant permission, we raise no objection to the proposals. However, technical flood risk advice is provided to the Applicant.

Land Drainage – Objects to the Application due to the location of the site within Flood Zone C1. It is strongly recommended that all current and future users register with the NRW Flood Warning Service. It is strongly recommended that a flood emergency action plan is drawn up and agreed stating a safe access and egress for highly vulnerable residents to higher ground.

Transportation Officer (Highways) – No objection subject to a condition.

Bridgend Town Council – *“This property is already a compact unit of HMO style units approved in recent time. At the time of conversion from a pub – which it had been for centuries – BTC specifically asked for a full investigation into the former passageway that led underground from the cellar up Newcastle Hill – possibly to St John’s House. This is an historic part of Bridgend in a Conservation Area – but no report back to the Town Council and how this passageway was to be preserved or to be available for tourism inspection on the Heritage Trail ever materialised. Now that a changed Application on the site is being considered this is the time to establish the cellar history once and for all. BTC requests a deferral of this Application until such investigation has been completed and the way forward established.*

That said, what inspection has been carried out on these premises with regard to fire exit regulations and the impact of changing the basic use once again on the adjoining two residential properties. An investigation by South Wales Fire Service is required.

There are no parking provisions, either car or cycle in the Conservation Area of the Park Street cul-de-sac. How does this comply with eco-friendly transport arrangements?

Planning permission has recently been refused for HMO development on the other side of the cul-de-sac. How will that impact on this Application?

Notwithstanding the above comments, BTC reserves the right to attend any future site meeting and to speak at the appropriate DC Committee! Finally it should be noted that the external wall fabric on this building is crumbling and needs repair; plus better attention to keep the peripheral area clean of surplus litter; neither of these matters being conducive to a Conservation area.”

RESPONSE TO COMMENTS RECEIVED

The Land Drainage Officer has objected to the Application on the basis that the site is situated within Flood Zone C1 of the Development Advice Map (DAM) contained within TAN15. A residential use has previously been granted consent on the site based on updated flood modelling work that suggested that the existing flood defences in place within the town centre would provide adequate protection from flooding to the Application

site. As the Application relates to the change of use between two residential uses, there would be no change in vulnerability to flood risk.

The Application has been considered against LDP policies relating specifically to HMOs and to good design and placemaking with regards to the compatibility of the use to this location and the impact of the development on the amenity of future residents of the site and its neighbours. This is discussed in further detail within the Appraisal section of this report.

The concerns relating to the lack of parking provision have been considered by the Highway Authority. The Application has been found to be acceptable in terms of its impact on the local highway network, as discussed in further detail below.

With regards to the request from Bridgend Town Council for investigations to take place of a cellar which potentially links the Application site to Newcastle Hill, it is not considered to be reasonable to request such investigative works of the Applicant in relation to this change of use Application.

REPRESENTATIONS RECEIVED

6 Park Street - I have just read through the proposed changes to the property that is situated opposite my salon and from my understanding they are only wanting to change the short term lets on the ground floor from a maximum of 31 days to unlimited, is this correct that this is the only change as there is already a HMO in the upstairs of the property. I also noted that the council frequently use the property for people that require housing, can you confirm whether or not the people that will be requiring housing going forward, will be just released from Prison that have No Fixed Abode and will be placed there.

If that information that has been passed to me is False, what type of people will be placed there? I ask this as the Anti Social Issues with Alcoholics and Drug Users Loitering Outside on the benches and the old Chapel at the bottom of newcastle hill have increased tenfold this past year and with that it becomes a Security and Safety Issue with my Business i work so hard to keep afloat.

RESPONSE TO REPRESENTATIONS RECEIVED

The first floor of the property is currently used as a HMO and the Application is submitted retrospectively in order to regularise this. The Applicant has confirmed that rooms are advertised using a local estate agent and potential tenants are vetted before they are granted a tenancy. The Applicant has suggested that it is in their best interests to ensure that tenants will not cause any issues, as they operate the site themselves, along with the short-term lets (Air bnb's) on the ground floor. South Wales Police confirm that they have no objection to the Application, whilst also confirming that they have received no complaints relating to the site or its tenants.

RELEVANT POLICIES

The relevant policies of the Local Development Plan and supplementary planning guidance are highlighted below:

Policy SF1	Settlement Hierarchy and Urban Management
Policy SP1	Regeneration and Sustainable Growth Strategy
Policy SP3	Design and Sustainable Place Making
Policy SP6	Sustainable Housing Strategy
Policy COM7	Houses in Multiple Occupation
Policy SP18	Conservation of the Historic Environment
Policy PLA11	Parking Standards

In the determination of a planning Application regard should also be given to the local requirements of National Planning Policy which are not duplicated in the Local Development Plan. The following Welsh Government Planning Policy is relevant to the determination of this planning Application:

Future Wales – The National Plan 2040**Planning Policy Wales Edition 12****Planning Policy Wales Technical Advice Note (TAN) 12 – Design****Planning Policy Wales Technical Advice Note (TAN) 15 – Development and Flood Risk****Planning Policy Wales Technical Advice Note (TAN) 24 – The Historic Environment****WELL-BEING OF FUTURE GENERATIONS (WALES) ACT 2015**

The Well-being of Future Generations (Wales) Act 2015 imposes a duty on public bodies to carry out sustainable development in accordance with sustainable development principles to act in a manner which seeks to ensure that the needs of the present are met without comprising the ability of future generations to meet their own needs (Section 5).

The well-being goals identified in the Act are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

The duty has been considered in the assessment of this Application. It is considered that there would be no significant or unacceptable impacts upon the achievement of well-being goals/objectives as a result of the proposed development.

THE SOCIO-ECONOMIC DUTY

The Socio-Economic Duty (under Part 1, Section 1 of the Equality Act 2010) which came in to force on 31 March 2021, has the overall aim of delivering better outcomes for those who experience socio-economic disadvantage and whilst this is not a strategic decision, the duty has been considered in the assessment of this Application.

APPRAISAL

This Application is referred to the Development Control Committee to consider the concerns of the Local Ward Members and the Town Council.

An appraisal of the proposals in the context of the relevant material considerations is provided below.

The main issues for consideration in the determination of this Application are the principle of development, its impact on the Conservation Area, residential amenity as well as its potential impact on highway safety and flood risk considerations.

PRINCIPLE OF DEVELOPMENT

The site is located within the Primary Key Settlement of Bridgend on the edge of the town centre as defined by Policy SF1 Settlement Hierarchy and Urban Management of the Bridgend Local Development Plan (LDP) adopted in 2024. Policy SF1 states that

development will be permitted within the settlement boundaries at a scale that reflects the role and function of the settlement.

Policy SP6 Sustainable Housing Strategy notes that the LDP makes provision for 8,628 homes to promote the creation and enhancement of sustainable communities and meet the housing requirement of 7,575 homes for the Plan period, of which, 1,711 of these homes will be affordable. Development will be distributed in accordance with Strategic Policy SP1, based on the Sustainable Housing Strategy that will amongst other outcomes – ‘*Support windfall residential development at appropriate sites within the settlement, focussing on the re-use of previously developed land*’. This strategic policy recognises the benefits of new residential development, including the reconfiguration of existing buildings and the re-use of vacant or under-utilised land.

The proposed site would classify as an appropriate site under Policy SP6 which makes an important contribution to the overall housing supply and introduces an important element of choice and flexibility into the housing market. Policy SP6 of the LDP and PPW 12 effectively supports the use of suitable sites for housing development as it can assist regeneration and at the same time relieve pressure for development on greenfield sites.

Policy COM6 Residential Density states that development must seek to create mixed, socially inclusive, sustainable communities by providing a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. The policy notes that new housing developments must make the most efficient use of land in accordance with sustainable, placemaking principles and that good design must be utilised to maximise the density of development without compromising the quality of the living conditions provided, whilst making adequate provision for privacy and space around dwellings.

The proposed HMO would provide a centrally located and sustainable house type located immediately adjacent to Bridgend town centre. It would utilise an existing building which has consent to be used for short-term accommodation. The first floor of the building includes seven bedrooms and communal living spaces for up to seven occupants, who also have access to additional communal facilities on the ground floor. All habitable rooms would benefit from natural light, ventilation, and a means of outlook onto Park Street or the public spaces surrounding the building. For these reasons, the proposed HMO is considered to meet Policy COM6 of the LDP.

The key policy relevant to this Application is Policy COM7 Houses in Multiple Occupation where it notes: ‘*Proposals to convert an existing building into a House in Multiple Occupation (HMO), bedsits or other forms of shared housing will only be permitted within defined settlement boundaries if:*

- 1) It would not lead to more than 10% of all residential properties within a 50m radius of the proposal being HMOs;*
- 2) Conversion is possible without major extensions or alterations to the building which would significantly alter the character and appearance of the street scene and the broader locality;*
- 3) The scale and intensity of use would be compatible with the existing building and adjoining and nearby uses;*
- 4) the proposal incorporates on-site parking provision or demonstrates that it will not have an adverse effect on local parking provision;*
- 5) the proposal includes adequate storage for recycling/refuse, cycles and a clothes drying area; and*
- 6) The proposed development would not have an unacceptable adverse impact on residential amenity.*

In all other respects development will be expected to meet the relevant requirements set out in other LDP policies.'

In terms of the above criteria, it is noted:

- 1) A search of Shared Regulatory Services Licensed HMO records, review of approved planning consents and an inspection of the surrounding area has identified only two HMOs located within 50m of the Application property. These are:
 - the 6-bedroom HMO at No. 12 Park Street (approved 20/01/2017 – P/16/861/FUL)
 - the 6-bedroom HMO at No. 14 Park Street (approved 10/05/2024 – P/23/753/FUL).

It should be noted that this policy applies to residential accommodation which provides shared housing only. Self-contained flats are not included as part of this assessment.

It is calculated that there are 28 properties within a 50m radius of the Application site. Therefore 2.8 HMOs would be permitted by the LDP criteria. The current proposal would result in three HMOs within the 50m radius. The proposal would result in a marginal exceedance of the 10% figure. As a building cannot be divided into 0.8 of a property, it is considered logical and pragmatic to allow the 10% figure to be exceeded by a marginal amount, to the nearest whole property, allowing a total of 3 HMO properties as opposed to 2.8 within the 50m radius. On balance, the proposal is considered to be compliant with criterion 1) of Policy COM7.

- 2) The proposal will not require, and does not include, any major extensions or alterations.
- 3) The scale and intensity of use is the same as the existing use which is for a 7-bedroom short-term lets with communal facilities. The proposed use would result in a lower turnover of tenants as compared with the existing use, allowing for greater stability and less disturbance for future residents of the property and neighbouring residents.
- 4) The property does not benefit from any designated car parking area. The property is located in a sustainable location in close proximity to the town centre, public transport hubs and other facilities. Cycle parking facilities are proposed to be provided at the front of the building. The Highways Officer has confirmed that they have no objection to the Application on grounds of parking provision or sustainability.
- 5) The proposal provides for waste and recycling storage at the side of the building, alongside cycle parking to the front. The proposal provides internal areas for the washing and drying of clothes on the ground floor of the building.
- 6) The proposed HMO is not expected to have any unacceptable impacts on residential amenity. Nor would it be anticipated that the proximity of other shared residential accommodation to the Application site would give rise to any increased adverse impact on amenity.

Accordingly, and for the above reasons, the proposal is considered to meet the criteria of Policy COM7 of the LDP.

On balance, it is considered that, in principle, the development accords with Strategic Policy SP6 and Policies COM6 and COM7 of the Bridgend LDP. Subject to satisfying all other policy requirements, the proposed development is acceptable in land use planning terms and accords with the Bridgend Local Development Plan (2024).

RESIDENTIAL AMENITY

Policy SP3 of the LDP criterion (k) states '*Applications for new development should ensure that the viability and amenity of neighbouring uses and their users/occupiers will not be adversely affected.*'

Overbearing / overshadowing and overlooking impact

The proposal involves no external alterations to the building and the change of use relates to a change between two residential uses. The proposed change of use would have no additional impact on the privacy or amenity of neighbouring residents. As such there are considered to be no issues in terms of overshadowing, overbearing or overlooking over and above what already exists on site.

Noise

Policy SP2 Criterion (g) also states that new development should '*Avoid or minimise noise, air, and soil and water pollution*'.

In terms of the likely impacts on neighbouring residential amenity, it is considered that the proposed use of the premises as a small HMO would not unreasonably compromise the level of amenity that is currently enjoyed and can be reasonably expected in such a locality. It is also considered that the level of activity and other likely effects of the use would not significantly exceed what was previously experienced as compared to the existing use of the building for short-term accommodation. South Wales Police have confirmed that they have not received any complaints relating to the property or its tenants, which has been in use as short-term lets/a HMO since 2021.

Any issues relating to noise from future residents of the property would be a matter for Shared Regulatory Services - Public Protection Officers to investigate under their legislation.

Amenity of future occupiers

In terms of the level of amenity and standard of accommodation being created for occupiers of the HMO, each bedroom facility has a satisfactory outlook with appropriate habitable room space and communal kitchen/bathroom facilities to support the use.

With regard to outdoor amenity space, the Application site does not provide any private amenity space. An area of pedestrianised public space does sit to the front of the building, whilst the amenities of Bridgend town centre and Newbridge Fields are situated a short walk away. On balance, the proposal is considered to be acceptable in this regard.

Bin storage and cycle storage

An existing area for bin storage is located at the side of the building. The property does not currently benefit from any cycle parking, however, the submitted site plan seeks to provide cycle parking stands to the front of the building. A condition has been imposed to ensure suitable cycle storage is available for the future residents of the property.

On balance, it is considered that the proposed change of use is acceptable and will not have any significant adverse impacts on existing neighbouring properties or amenities. As such, there are no justifiable grounds to refuse planning permission on residential amenity grounds, having particular regard to the fact that if any such issues arise in the future, these can be addressed by the Environmental Health Section under their statutory nuisance powers. The development, therefore, accords with Policy SP3 and DNP9 of the Bridgend Local Development Plan (2024)

HIGHWAYS

Policy PLA11 of the adopted Local Development Plan (2013) stipulates that all

development will be required to provide appropriate levels of parking in accordance with the adopted parking standards.

The existing building offers no designated off-street parking with no on-site parking provision proposed as part of the scheme. The site does benefit from being in a highly sustainable location in close proximity to the town centre where a number of public car parks and public transport hubs are situated within easy walking distance. The site has good access to retail and public services provided within the town centre. As such, car ownership levels are likely to be low, with visitors able to use the public car parks in the vicinity of the site.

In terms of promoting active travel for future residents the Highway Authority has requested a condition for cycle parking provision at the site.

Accordingly, whilst the site is situated within a pedestrianised area and surrounding streets are fully subscribed with regard on-street parking, it would be unlikely that an objection based on parking could be sustained given the sustainable location of the site and the fallback position of the property in planning terms. As such the Highway Authority has confirmed that they have no objection to the proposal.

FLOOD RISK

Technical Advice Note (TAN) 15 provides guidance in relation to development and flooding, to supplement the policy set out within Planning Policy Wales (PPW). The aim of the framework is to direct new development away from areas which are at a high risk of flooding while defining the vulnerability of uses and requiring justification for the siting of more vulnerable uses in areas of higher risk.

The Natural Resources Wales (NRW) Flood Risk Map confirms that the Application site is situated within Zone C1 of the Development Advice Maps. The site is identified as being at risk of flooding. As the proposal seeks to change the use of the first floor of the site from Use Class C6 (a highly vulnerable, residential use) to a residential use within sui generis, NRW have no objection to the Application.

A residential use was granted consent at the site following the submission of up-to-date modelling data of the River Ogwr (undertaken in 2020) which supersedes the 2016 model data provided by NRW. The area of town centre which is protected by the flood defences includes the Application site which, according to the most up to date model, is protected against the 1 in 100 year event.

There remains however, areas of the town centre which would be liable to flooding within the 1 in 1000 year event. The updated modelling work which was carried out centred around the 5 weirs which are situated within the River Ogwr in Bridgend. The modelling confirmed that by removing 1 of the 5 weirs (Weir 1), it would have a significant effect in further reducing flood risk in the 1 in 1000 year event. These are works which the Council is intending on undertaking in order to further protect the town centre against the most extreme flood events.

Paragraph A1.14 of TAN15 advises that *development should be designed to be flood free during the 1% fluvial flood (i.e. that fluvial flood with a 100 to 1 chance of occurring in any year)*. As the updated model confirms that the Application site is protected by flood defences for the 1 in 100 year event, the proposal is considered to be compliant with Paragraph A1.14 of TAN15.

As the building already benefits from consent for a residential use, the vulnerability of the proposed use would not change as a result of the development. On balance, the

Application is deemed to be acceptable in this regard. The developer has been made aware of the potential flood risks and is advised to implement flood-proofing measures/plans as part of the works as well as to sign up to the NRW flood warning scheme.

IMPACT ON THE CONSERVATION AREA

The site is located within the Conservation Area of Newcastle Hill as defined by Policy SP18(5) Conservation of the Historic Environment of the LDP. Policy SP18 states that development should conserve, preserve or enhance the built and historic environment of the County Borough and its setting. Development proposals will only be permitted where it can be demonstrated that they will not have a significant adverse impact.

The proposed development does not seek to make any external changes to the building, other than the provision of cycle parking to the front of the property, with the change of use impacting on the existing space within the property. As a result, the visual impact of the development will be limited. The proposal is considered to have no impact on the qualities of the Conservation Area and is therefore considered to be acceptable in this regard.

ARCHAEOLOGICALLY SENSITIVE AREA

The site is located within an Archaeological Sensitive Area of Bridgend as defined by Policy SP18(3) of the LDP. The proposed development seeks the change of use of the property with no external / underground works proposed as part of the Application. The Glamorgan Gwent Archaeological Trust (the archaeological advisers to the Authority) has not commented on the submission nor recommended any requirement for mitigation and it is therefore considered that there will be no adverse impacts on any heritage asset.

CONCLUSION

On balance, and having due regard to the objections and concerns raised, the proposed development, subject to the imposition of conditions, complies with Council policy and guidelines and does not adversely affect the character of the conservation area, prejudice highway safety, privacy or visual amenities nor so significantly harm neighbours' amenities, particularly with regard to the fear of anti-social behaviour or possible crime, as to warrant refusal on those grounds.

The scheme also raises no adverse biodiversity concerns. Any issues relating to the poor management of HMOs are resolved through the separate licensing regime and legislation and not through the planning system.

As such, it is considered that the development is acceptable and complies with Policies SP3, SP5, SP6, SP17, SP18, SF1, PLA11, COM6, COM7, DNP6 and DN9 of the Bridgend Local Development Plan (2024).

RECOMMENDATION

(R02) That permission be GRANTED subject to the following condition(s):-

1. The development shall be carried out in accordance with the following approved plans and documents:
 - Proposed First Floor Plan (received 23rd January 2024)
 - Proposed Ground Floor / Site Plan (received 10th June 2024)

Reason: To avoid doubt and confusion as to the nature and extent of the approved development.

2. A scheme for the provision of 4 internal cycle parking spaces shall be submitted to the

Local Planning Authority for approval. The agreed scheme shall be implemented within 3 months of the date of this consent and retained thereafter in perpetuity.

Reason: In the interests of promoting sustainable means of travel to / from the site.

*** THE FOLLOWING ARE ADVISORY NOTES NOT CONDITIONS ***

a. On balance and having due regard to the objections and concerns raised, the proposed development, subject to the imposition of conditions, complies with Council policy and guidelines and does not adversely affect the character of the conservation area, prejudice highway safety, privacy or visual amenities nor so significantly harm neighbours' amenities, particularly with regard to the fear of anti-social behaviour or possible crime, as to warrant refusal on those grounds.

The scheme also raises no adverse biodiversity concerns. Any issues relating to the poor management of HMOs are resolved through the separate licensing regime and legislation and not through the planning system. As such, it is considered that the development is acceptable and complies with Policies SP3, SP5, SP6, SP17, SP18, SF1, PLA11, COM6, COM7, DNP6 and DN9 of the Bridgend Local Development Plan (2024).

b. The developer will need to consider a safe means of access/egress/refuge for occupants during a flood event and develop an emergency plan which should include flood warning notices to be positioned throughout the building to ensure that future owners and/or occupiers are aware that the site is at risk of flooding.

c. Owners/Occupiers should consider utilising the Natural Resources Wales flood warning scheme on 0345 988 1188 or on line at <https://naturalresources.wales/flooding/sign-up-to-receive-flood-warnings/?lang=en>

d. Prior to carrying out any works in the highway (installation of cycle parking), details must be agreed with the Highway Maintenance Manager. You should contact the highway maintenance inspector for the area, Bridgend County Borough Council, Civic Offices, Angel Street, Bridgend. Telephone No. (01656) 642541.

**JANINE NIGHTINGALE
CORPORATE DIRECTOR COMMUNITIES**

Background Papers

None.