



Delegated Report

Full Planning Application

Application No:	20221044
Location:	Old Barn Bungalow, Woodhill, Meopham, Gravesend, Kent, DA13 0DJ
Description:	Application for variation of condition 4 attached to planning permission reference no. 20160923 for the erection of a detached double garage at the side; to allow the garage to be used as an annexe incidental to the main house.
Applicant:	Mr Tebbutt
Site Visit:	N/A Desktop Assessment

Submitted Documents/Plans

Application Form - dated 26/09/2022;
Covering Letter - dated 26/09/2022;
Supplementary Information - Site Photographs (1-11) (received 21/11/2022);
Un-numbered Drawing - Existing Floor Plan (received 28/09/2022).

Relevant Planning History

Reference	Description	Decision	Decision Date
20160923	Erection of a detached double garage at the side.	PERMITTED	13.01.2017
19890635	Construction of dormers in the front and rear roof slopes and conversion of roof space to form bedroom and bathroom.	PERMITTED	05.09.1989
19870472	Erection of two storey rear extension to form enlarged lounge with two bedrooms at first floor level and two storey side extension to form hall and staircase	PERMITTED	04.09.1987
19860322	Alterations to form two covered ways at the rear porch at the front and total reroofing of the bungalow and cladding of dwelling with brick skin	PERMITTED	17.06.1986
19850712	Outline application for erection of detached dwelling and formation of a vehicular access	REFUSED	11.11.1985
19560223	Alterations and additions	PERMITTED	10.10.1956
19560127	Alterations to bungalow	PERMITTED	08.08.1956

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 - Sustainable Development
- CS02 - Scale & Distribution of Development
- CS11 - Transport
- CS12 - Green Infrastructure
- CS18 - Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- C13 - Extensions to dwellings in the Countryside
- P3 - Vehicle Parking Standards

Gravesham Local Plan Review

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

Gravesham Local Plan Regulation 18 Stage 2 Consultation Part 2: Draft Development Management Policies Document (2020)

The Council published in 2020 a Regulation 18 (stage 2) consultation on its proposed Development Management Policies Document, replacing the 2018 Stage 1 version, which will in due course form part of and update the Gravesham Local Plan. Under paragraph 48 of the NPPF, policies in this document may be accorded weight in the decision making process with this varying according to its stage of preparation; the extent to which there are unresolved objections; and the degree of consistency of policy with those in the Framework. As the Development Management Policies Document is at an early stage and the fact that the consultation has only recently concluded, the policies therein should at this stage be given very limited weight. It should be noted, in any event, that many of the relevant policies reflect those set out in the Framework and for the purposes of this application these should be relied on instead.

The following draft policy, '*Proposed Policy RES 3: Residential Annexes*', from the Regulation 18 (Stage 2) Development Management Policies Document (2020) show the direction of travel the Council is going albeit the weight that these emerging policies may be accorded at this stage is very limited.

9.3.8. Planning permission will only be granted for residential annexes within the curtilage of an existing residential property where there is a proven need that cannot be met either within the existing property through adaptation or acceptable extension and:

- *there is a functional link with the principal dwelling (i.e. the occupants should be a dependant relative/s);*
- *both the annex and principal dwelling are in the same ownership and remain so in perpetuity;*
- *the accommodation forms a linked extension to the main dwelling and is capable of being used as an integral part of the dwelling, or forms a separate outbuilding which is in close proximity to and within the curtilage of the principal dwelling, and shares some essential facilities with the main dwelling; and*
- *the scale of the annex is subordinate to the existing dwelling and is the minimum level of accommodation required to support the needs of the intended occupant/s; and*

- *there is adequate parking and amenity facilities (areas for bin storage, drying clothes, garden space etc.) for the needs of the annex occupants and existing residents; and*
- *there is no boundary demarcation or subdivision of garden areas between the curtilage annex and principal dwelling;*

9.3.9. Where planning permission is granted for a residential annex, a planning obligation will be imposed to ensure that the annex retains a functional link with the main dwelling (i.e. the occupants should be a dependant relative(s) and that the annex is retained in the same ownership as the main dwelling and that this remains the case in perpetuity.

National Planning Policy Framework (2021)

- Section 2 - Achieving Sustainable Development
- Section 4 - Decision Making
- Section 12 - Achieving Well-Designed Places
- Section 13 - Protecting Green Belt Land
- Section 15 - Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- SPG 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 - amended June 2020
- Technical Housing Standards - Nationally Described Space Standard (2015)
- SPG 4 - KCC Parking Standards (2006)
- Householder Extensions/Alterations Design Guide (2021)
- Gravesham Landscape Character Assessment (2009)

Any Other Supplementary Planning Guidance

Kent Downs Area of Outstanding Natural Beauty Management Plan - As the site lies within the Kent Downs Area of Outstanding Natural Beauty (AONB), the adopted Kent Downs AONB Management Plan is also relevant. The policies relevant to the consideration of this application are:

- LLC1
- LLC2

Consultations, Publicity and Representations

External Consultees

Kent County Council (Public Rights of Way) - Having looked at the application I do not believe that the path will be affected materially. As such I have no comments to make.

Kent Downs AONB Management Unit - No comment received.

Meopham Parish Council - No comment received.

Dickens Protection Society - The site is in an area within which Green Belt policies apply and in the North Downs Area of Outstanding Natural Beauty. The proposed could result in the building being used as a dwelling. Green Belt policy only permits new dwellings under very special circumstances and no very special circumstances have been put forward that would warrant overriding Green Belt policy. The Society therefore wishes to register an objection to the application and considers the condition should be retained.

Internal Consultees

GBC - Environmental Protection (Regulatory Services) - Having reviewed the submitted documents, Environmental Protection has no objection to this application or comment to make.

GBC Highways Officer - This proposal gives some concern, whilst the loss of the garage would not result in a reduction in car parking below current guidance. The Google Street View images demonstrate that there is a higher than what I would consider normal parking demand for a residential property, including vans and pickup trucks.



May 2019



January 2021

Whilst no doubt a matter for Building Regulations, no details are given regarding foul drainage disposal. No doubt, it connects into the existing system, but if it is not main drainage, an additional person/bathroom may result in the need to reassess the situation.

 BRITISH WATER <i>expertise worldwide</i>			
Table of Loadings for Sewage Treatment Systems			
Per person / activity / day (unless otherwise specified)	FLOW	BOD	Ammonia
(Grams)	(Litres)	(Grams)	as N
DOMESTIC DWELLINGS			
Standard residential	150	60	8
Mobile home type caravans with full services	150	60	8

This equates to approximately one extra cubic metre of effluent per week.

Given the current policy regarding the provision of car parking at residential properties I have no objections, but given the unique reasons given for the conversion, I would suggest the garage should be restored upon the death of the applicant. Given an extra bedroom is being created to comply with the requirements of SPG4 a secure cycle parking space should be provided for the extra bedroom.

Local Ward Councillors - No comment received.

Neighbouring properties

A notice was displayed on site 19th October 2022.

In addition, five surrounding properties were consulted and no representations were received. The consultation period expired

Officer's Analysis

Site Description

Old Barn Bungalow is a detached single storey bungalow in use as a single dwelling. The property is situated on a large plot approx. 2 acres in size. There are a number of stables to the north of the site which are for the private use of the owner and a double garage was granted permission in 2017. The property is set back from the road in excess of 40m, situated at the bottom of a long driveway with the garden laid to lawn either side. There is a private garden area to the rear. The property has been extended into the roof space to provided additional bedroom space with the insertion of a small dormer in the front and rear roof slope.

The site falls within the Green Belt, and is an area of outstanding natural beauty. It is also within the Harvel

Wooded Downs Landscape Character Assessment Area.

Proposed Development

This application seeks retrospective permission for the conversion of the garage into an annexe incidental to the main house. The conversion of the garage requires planning permission due to condition (4) attached to planning permission ref. 20160923 that precluded use of the garage for any other purpose than vehicular parking and should not contain primary living accommodation at any time. Therefore, as the conversion of the garage is complete and this is a retrospective application, the applicant is in breach of the condition.

For the avoidance of doubt condition 4 is:

The garage hereby permitted shall be used only for the accommodation of private motor vehicles for the occupants of Old Barn Bungalow as a private dwelling house and for no other purpose and no development, whether or not permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any provision equivalent to that Order in any Statutory Instrument revoking or re-enacting that Order, with or without modification), shall be carried out on the site in such a manner or in such a position as to preclude the use of or access to the reserved vehicle parking area; for the avoidance of doubt the garage shall not at any time contain any primary living accommodation and no trade or business shall be carried on therefrom.

This development does not include any extension to the garage, but has replaced one of the garage doors with a window.

Conversion of the Garage

The principle consideration of this part of the application is that the property falls within the Green Belt which is subject to strict policy constraints. Unfortunately, there are no specific development plan policies on the provision of outbuildings in the green belt. However, adopted Core Strategy policy CS02 requires development to be compatible with national policies for protecting the Green Belt.

It is noted that while saved Policy C13 (vii) of the Local Plan First Review sets out that the Council's approach to assessing proposals for outbuildings in the countryside and makes clear that they will be considered on their individual merits, it is out of step with the National Planning Policy Framework (NPPF). Therefore, it should be attributed minimal weight for the following reasons;

National Green Belt planning policies are detailed under Section 13 of the NPPF "Protecting Green Belt land". Paragraph 149 states that the construction of new buildings in the Green Belt is inappropriate development. It goes on to list six exceptions to this, however ancillary residential outbuildings do not form one of the exceptions specifically listed.

Paragraph 149(c) has some relevance, stating that the construction of new buildings (paragraph 149) is considered to be 'inappropriate' development in the Green Belt except where this involves (amongst other things) the:

- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and

However it is clear that domestic outbuildings, including garages, do not specifically fall within this list and as such they are considered to be inappropriate development per se.

In line with paragraph 147, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 sets out that substantial weight should be given to that harm and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

In relation to saved policy C13 (vii) of the Gravesham Local Plan First Review, paragraph 219 of the NPPF sets out that 'Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). Core Strategy policy CS01 also sets out in paragraph 4.1.8;

Where there are no policies relevant to the application for relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted.*

This second bullet point is in line with paragraph 11 of the NPPF. Examples of the policies that indicate that development should be restricted are set out in a footnote in the NPPF and include land designated as Green Belt.

In addition, when considering proposals in the rural area, Policy CS02 gives further support to the policy approach set out in the NPPF stating that development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan.

On the basis of the above, it is considered that only minimal weight can be given to this part of policy C13.

The effect of the proposal on the openness of the Green Belt

Paragraph 137 of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also states that the essential characteristics of Green Belts are their openness and permanence.

As aforementioned in this report, the existing structure has not been enlarged or extended in any way. Therefore, the visual openness of the Green Belt will not be affected by any increased build development on the site. However, the proliferation of residential use and potential increase in residential paraphernalia as a result of the conversion could impact on the spatial openness of the Green Belt. The annexe will be an ancillary use to the main dwellings (as discussed later in this report) and therefore only minimal impact to the spatial openness of the Green Belt will result. However, this minimal impact will be restricted by conditions to ensure that the annexe use is returned to a garage once no longer required for its given purpose. As such, the development is considered to have minimal impact on the openness of the Green Belt.

Very special circumstances

Given the above determination, the national Green Belt policies contained in the NPPF are the presiding policy in determining a proposal for ancillary residential outbuildings in the Green Belt. It is considered that proposals for a detached annexe outbuilding would constitute inappropriate development in the Green Belt that is harmful to the Green Belt and should not be approved except in very special circumstances. Moreover, substantial weight should be given to that harm and that very special circumstances will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

[REDACTED]

In the Green Belt context, this very special circumstance is considered sufficient to overcome the minimal impact that an annexe would have

on the spatial openness of the Green Belt through increase residential activity. Moreover, planning conditions can be attached to the decision notice to remove the additional residential use (annexe) once its use is no longer required and any additional harm to the Green Belt will be removed.

Principle of the Annexe

The planning position relating to the provision of buildings or structures for annexes or the conversion of buildings for use as annexes (sometimes termed 'granny annexes') or other ancillary accommodation is quite complex and sometimes contradictory and there is case law, in relation to such development, which can itself be open to interpretation.

It is recognised that 'residential annexes' in whatever form that might take are an increasingly common form of development that are generally proposed in order to allow relatives to live with their family with some degree of independence. However, to remain ancillary accommodation and not a separate unit of accommodation, the use of annex must normally retain some form of reliance on the main dwelling.

There is no specific local or national planning policy that directly relates to the provision of new, or use of existing buildings, as annexes. However, there are emerging policies in the Regulation 18 (Stage 2) Development Management Policies Document (2020), including RES 3: Residential Annexes, that show the direction of travel the Council is going and such emerging policies may be accorded some limited weight.

- By way of general guidance, a proposed annex should (where possible):
- Be subordinate to, and used in connection with, the main dwelling and must not be able to function without the main dwelling (for example, not having separate kitchen facilities).
- Be interconnecting with the main dwelling as a whole (for instance via doorways); if accessed by a separate external entrance this should not separate from the main dwelling and therefore should rely on a common shared access with the main dwelling.
- Be within the curtilage of the main dwelling.
- Have a functional connection with the main dwelling (e.g. the occupant should be a dependant relative of the residents of the main dwelling or employed at the main dwelling).
- Be in the same ownership as the main dwelling.
- Be designed in such a way as to easily allow the annex to be used at a later date as an integral part of the main dwelling.
- Have no boundary demarcation or subdivision of the garden areas between the curtilage of the main dwelling and the annex.
- Have adequate parking and amenity facilities for the needs of the annex occupants and the residents of the main dwelling.
- Comply with the Council's normal standards for extensions to a dwelling including those relating to design and the amenities of neighbouring occupiers.

***Note: The above is largely reflected in emerging policy RES3: Residential Annexes Regulation 18 (Stage 2) Development Management Policies Document (2020).*

A key consideration in this application is whether the site will continue to operate as a single planning unit or whether there will be two households living independently of each other on the site. However, identifying a separate planning unit requires consideration of a range of factors and not simply if a unit of accommodation is self-contained, but is a matter of fact and degree. Even if the accommodation provided facilities for independent day-to-day living, it would not necessarily become a separate planning unit from the main dwelling; it is a matter of fact and degree whether a change of use has occurred.

Case Law

The use of an existing outbuilding for ancillary residential accommodation in association with a main dwellinghouse does not require planning permission provided it complies with Sec. 55(2)(d) of the 1990 Act that provides that the use of buildings within the curtilage of a dwellinghouse for any purpose "incidental to the enjoyment" of that dwellinghouse is not development.

A number of cases, detailed below, have shown that for the purposes of Sec. 55(2)(d) “incidental to the enjoyment” may be interpreted generously. The creation of an annexe from an existing outbuilding would therefore be unlikely to require permission provided the building was occupied by a family member. However, the situation is not as clear where the occupant is someone who is not a member of the family but has a strong functional connection with the main dwelling, for example, a housekeeper or handyman.

If the accommodation created constitutes a separate planning unit, this then is not an incidental use, as Sec. 55(3)(a) makes clear. Any separate residential occupation of a building or buildings formerly within an existing single residential planning unit is development by virtue of Sec. 55(3)(a) of the 1990 Act, as confirmed by *Wakelin v SoS* 1978, a case in which a large house with a lodge that had been converted into two flats used as guest suites was proposed to be converted into a separate dwelling and sold off. The court held that the house, lodge and grounds were one planning unit and that to sever the lodge would constitute a material change of use.

In essence, an annexe will become a separate single dwellinghouse where it is self-contained with all the necessary day-to-day living facilities and has resulted in the creation of a separate planning unit. *Uttlesford DC v SoS and White* 1992, in which a garage attached to a dwelling had been converted to a ‘granny annexe’, provides leading case law on the matter. In *Uttlesford* an Inspector had determined that where a domestic garage within a residential curtilage was used for living accommodation in connection with the dwelling, no material change of use occurred. The court agreed, ruling that the fact that the elderly occupier of the annexe had all the living facilities that enabled her to live independently from the rest of the family did not amount to the creation of a separate planning unit that required permission. The significance of this case is that the even though the accommodation in the garage was capable of independent use, the court judgment suggested that a quality of separateness was occupation by someone who was not connected with the family occupation of the whole planning unit.

Identifying a separate planning unit requires consideration of a range of factors and not simply the self-containment of the accommodation, and is a matter of fact and degree. In her decision to grant permission for the conversion and extension of an outbuilding at a house in the Essex green belt to a residential annexe, notwithstanding the Council’s concern that it would result in the creation of an independent residential unit, the Inspector in *Castle Point 27/11/2020 DCS No 400-028-727* relied on the *Uttlesford* judgment. The Council had reached its own view that the proposal was tantamount to a new dwelling with reference to *Gravesham BC v SSE* 1984 because the accommodation provided all the facilities for independent day-to-day living. The Inspector, however, followed the more recent and relevant case law in *Uttlesford*, stating that even if the accommodation provided facilities for independent day-to-day living, it would not necessarily become a separate planning unit from the main dwelling and it was a matter of fact and degree whether a change of use had occurred.

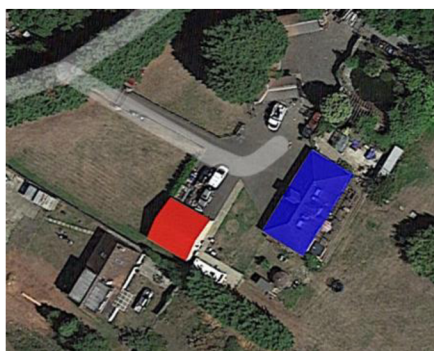
In the case before her, the Inspector recorded that whilst the extension and conversion of the outbuilding would provide all the facilities for day-to-day living, it would function as an annexe, with the primary occupants also sharing living space, eating and socialising with the rest of their family in the main dwelling. There was a paved footpath between the annexe and the main house allowing easy access between the two. As such, she held that the garage conversion would remain part of the same planning unit as the main dwelling. Based upon the evidence before her the inspector was satisfied that the proposal related to an annexe. She allowed the appeal subject to a condition that it should not be severed from the main house by reason of being sold or let as a separate unit of accommodation.

In reaching her decision, the Inspector noted that reference had also been made to *Carter v South Bucks DC* 2011 but considered that case was different in that a garage had been converted into a three-bedroomed property with a substantial conservatory extension. It had its own garden, separated from the main dwelling by fencing, trees and shrubs, with no footpath linking the two buildings. Whilst family meals were taken together that was in the substantial garage conversion rather than in the host dwelling. As a matter of fact and degree in that case it was found that a new planning unit had been created.

In this case, the proposed annexe would not be capable of being occupied independently, as there are no

kitchen facilities or washing appliances within the annexe, and therefore will rely on the main dwelling for day-to-day living and key functions. Moreover, the information submitted states that the annexe will be occupied by family members. As such, it would be ancillary to the main dwelling and would not be considered a separate planning unit, in its current form.

The building is separated from the dwellinghouse by approx. 12m and does not rely on the main dwelling for access, however is connected to the main dwelling by pathways and hardstanding. Although pathways and hardstanding connect to the main dwelling, the distance and orientation of the two structures represents separation, and could be considered to lend itself to plot severance (see existing satellite image below):



However, the Local Planning Authority consider that any fencing/plot severance could be restricted, along with the ancillary use of the annexe, through planning conditions. It is on this basis and in considering the above case law, as a matter of fact and degree, a new planning unit would not be created at the application site, and the proposal would therefore comply with saved Policy C13 of the Local Plan First Review (LPFR) (1994), Policy CS02 of Gravesham's Local Plan Core Strategy (LPCS) (2014) and paragraphs 149 and 150 of the NPPF 2021.

Nevertheless, as aforementioned, given the concern relating to the potential for plot severance, it will be essential to impose a conditions that restrict subdivision of the curtilage and the use of the annexe as ancillary to the main dwelling, and that when the annexe no longer required for such a use, to return to a garage.

The effect on the character and appearance of the area and the landscape

Policy CS19 (Development and Design Principles) (LPCS) states that new development will be visually attractive and locally distinctive. It should also conserve and enhance the character of the local built and natural environment and integrate well with the surrounding area.

In addition, the application site is located within the Harvel Wooded Downs landscape character area and the Kent Downs Areas of Outstanding Natural Beauty. Policy CS12 (LPCS) states that the overall landscape character and valued landscapes will be conserved, restored and enhanced with the greatest weight being given the conservation and enhancement of the landscape and natural beauty of the Kent Downs AONB and its setting.

This proposal will not alter the external appearance of the garage structure, with the exception of the removal of one garage door, but importantly does not increase the footprint or extend the building in any way. Therefore, it is not considered to be any design impacts or harm caused to the Harvel Wooded Downs or AONB, and the application is in accordance with Policies CS12 and CS19 (LPCS).

Other matters

Amenity of Future Occupiers

Policy CS19 (LPCS) requires that all development should be 'fit for purpose' and be 'adaptable to allow

changes to meet the need of users' and that 'the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines' (RLG) (2020). Moreover, on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England and set out how these would be applied through planning policy. These standards came into effect on 1 October 2015.

Although the floorplan is basic, it demonstrates that the total internal floor area of the building is 81m², which is in accordance with the National Space Standards (2015). The RLG breaks down the measurements further, recommending minimum floor areas for specific rooms as shown in the table below:

	RLG (minimum floor area)	Proposed Room Size
Lounge	13.2m ²	25m ²
Double Bedroom	11.2m ²	20m ²
Bathroom & WC	3.6m ²	12m ²

The table above highlights that the rooms within the annexe accord with the recommendations set out within the RLG. It was unclear from the original plan submitted whether the habitable rooms within the annexe would receive natural light, however the requested photographs establish that all habitable rooms, as well as the bathroom, will be well lit and ventilated (see photographs below):



The proposed annexe will provide acceptable amenity for future occupiers. The size of the unit and the rooms comply with local and national space standards. As such, the proposed conversion is considered to safeguard the amenity of future occupiers and is in accordance with Policy CS19 (LPCS) and Section 12 (NPPF).

Neighbouring Amenity

The development will not cause any material harm to the amenity of surrounding properties in terms of loss of light, loss of privacy, outlook or sense of enclosure. As such the development is considered to safeguard the amenity of neighbouring properties in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2021).

Parking and Highways

There are no parking or highway issues related to this proposal. Although the application involves the loss of the double garage of vehicular parking, the property benefits from a large driveway with adequate space to parking vehicles in accordance with Gravesham's adopted parking standards (SPG4) (2006).

Conclusion

The application has been fully considered and is in accordance with local and national planning policy.

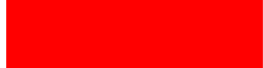
The annexe is not considered to create a new planning unit on the site. The development will not enlarge the building and will not cause material harm to the Green Belt or AONB, nor alter the character or appearance of the structure. Furthermore, the amenity of future occupiers and neighbouring properties will be safeguard, and there will be not impact on the highway network or safety of road users.

As such it is recommended that planning permission is granted, subject to conditions.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	2 nd December 2022	Dated:	06 December 2022