



Delegated Report

Householder Planning Application

Planning Application No: 20230484

Location: Stavesacre Cottage Longfield Avenue Gravesend Kent

Description: Erection of first floor rear extension; new raised roof incorporating two front dormers and one rear dormer to create habitable accommodation within the new roof space; and upward extension of chimney on eastern side.

Applicant: Mr Paul Gubb

Site Visit Date: 19 June 2023

Submitted Documents/Plans

Householder Planning Application form;
Drawing no. PG/01 Existing front and eastern side elevation and ground floor layout plans;
Drawing no. PG/02 Existing rear and western side elevation and first floor layout plans;
Drawing no. PG/03 Proposed ground floor layout plan;
Drawing no. PG/04 Proposed first floor layout plan;
Drawing no. PG/05 Proposed loft floor layout plan;
Drawing no. PG/06 Proposed front elevation;
Drawing no. PG/07 Proposed eastern side elevation;
Drawing no. PG/08 Proposed rear elevation;
Drawing no. PG/09 Proposed western side elevation;
Drawing no. PG/10 Proposed section A-A;
Drawing no. PG/11 Site location and existing and proposed block plans;
Location plan; and
Planning Statement.

Procedural issues

It is noted that drawing no. PG/11 is not accurate in its representation of the existing and proposed parking arrangements at the application site. The driveway is narrower than that shown. However, this inaccuracy has not undermined the determination of the application.

Relevant Planning History

Reference	Description	Decision	Decision Date
20190908	Erection of a first floor extension.	Permitted	23.10.2019
20190565	Application for a Lawful Development Certificate in respect of the proposed erection of a first floor rear extension.	Granted	05.08.2019
20180953	Erection of a first floor extension.	Refused	06.11.2018

19840297	Outline application for erection of one dwelling with double garage	Refused	17.05.1984
19770814	Erection of porch to front door and detached private garage	Permitted	06.12.1977
19760471	Alterations and extensions to provide additional living accommodation.	Refused	04.08.1976
19750851	Alterations and Extensions to provide additional living accommodation	Refused	17.02.1976
19730171	Alterations and Extensions.	Refused	13.04.1973
	Appeal against the refusal	Allowed	12.03.1974

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)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- C13 – Extensions to dwellings in the countryside

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.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 9 – Promoting Sustainable Transport
- 12 – Achieving sustainable development and well-designed places
- 13 – Protecting Green Belt land
- 15 – Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- 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)

Consultations, Publicity and Representations

GBC Highways Officer

I have no objections, the property has more than enough car parking to comply with guidance. However, the additional bedroom does require the provision of a secure cycle parking space to conform to the requirements of Kent's vehicle parking standards SPG4.

GBC Environmental Protection Team (Regulatory Services)

No objection to this application. The following to be considered:

Code of Practice on Construction and Demolition:

Please apply as appropriate to minimise any impact from noise and dust to nearby premises during the construction.

KCC - Biodiversity Officer

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that further information is sought from the applicant with regards to the potential for ecological impacts to arise.

Habitats and features (including the building to be extended and ancient woodland) are present on and around the site, indicating ecological value and the potential for protected species presence (e.g., roosting bats) that must be taken account of in the planning decision. As such, an Ecological Impact Assessment (EclA) should be undertaken by a suitably qualified ecologist¹, in accordance with good practice guidelines.

To ensure that the planning determination is adequately informed in respect of all potential ecological impacts, we advise that the EclA is sought prior to determination of the planning application. This is in alignment with paragraph 99 of ODPM 06/2005 which states "it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision".

The EclA will also ensure alignment with the National Planning Policy Framework (NPPF) 2021 and the Natural Environment and Rural Communities Act (NERC) Act 2006. Under section 40 of the NERC Act 2006 and paragraph 174 of the NPPF 2021, biodiversity should be maintained and enhanced through the planning system. Additionally, in alignment with paragraph 180 of the NPPF 2021, the implementation of measurable net gains for biodiversity (integrated as part of design) should be encouraged. As such, we advise that information is submitted with the EclA to demonstrate that the development can achieve a biodiversity net gain.

Neighbouring properties

The application was publicised by a site notice and to three neighbouring properties by letter. No representations have been received. The overall consultation period expired on 23 June 2023.

Officer's Analysis

The application site lies within the Green Belt. Policy CS02 of the Gravesham Local Plan Core Strategy (September 2014) prioritises development in the urban area as a sustainable location for development. In the rural area it states that development will be supported within rural settlements that are inset from the Green Belt and defined on the Policies Map. Development outside those settlements (which is the case here), will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Local Plan Core Strategy.

Therefore, the principle issues in the determination of this application are;

- Is the proposed development appropriate in the Green Belt?
- Effect on the openness of the Green Belt
- Effect on the character and appearance of the area - including landscape character
- Other matters

- Very Special Circumstances

Is the proposed development appropriate in the Green Belt?

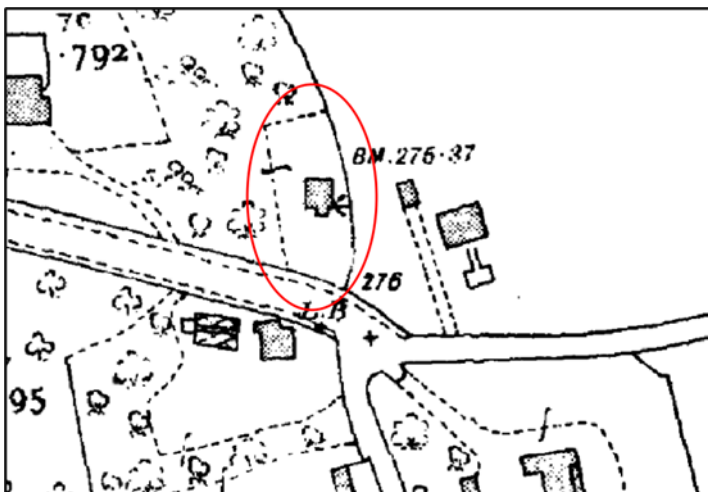
Paragraph 137 of the National Planning Policy Framework 2021 (NPPF 2021) sets out that the essential characteristics of Green Belts are their openness and permanence and paragraph 138 lists the five purposes that the Green Belt serves. At the application site, the Green Belt assists in safeguarding the countryside from encroachment. Paragraph 147 of the NPPF 2021 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 149 of the NPPF 2021 states that the construction of new buildings should be regarded as inappropriate development in the Green Belt but lists certain exceptions. These exceptions are set out in sub-paragraphs 149(a) to 149(g). Sub-paragraph 149(c) identifies 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.

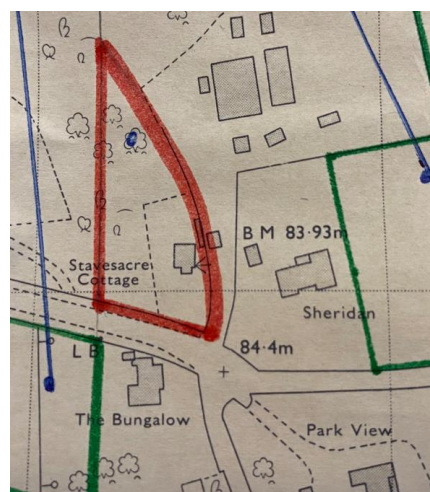
Saved Policy C13 of the Gravesham Local Plan First Review (November 1994) relates to extensions to dwellings in the countryside. It sets out a number of criteria that should be met when considering proposals for domestic extensions. As the policy pre-dates the NPPF 2021, the weight attached to the policy must be considered carefully; with greater weight being given where the approach is consistent with paragraph 149 the NPPF 2021.

In particular, Saved Policy C13 places an overall limit on extensions of one third of the gross floor area of the original dwelling unless the increased floor space has no overall effect on the existing bulk and appearance of the dwelling (criteria (ii)). It also requires the massing, scale and form of any extension to be appropriate to the existing dwelling and the Green Belt setting (criteria (vi)). It is considered that these factors are relevant in determining whether the size of an extension is proportionate and as such, these aspects of the policy are broadly in line with the NPPF 2021 and should be afforded weight.

The original building, for the purposes of assessing whether the proposed development is a disproportionate addition or not, appears to pre-date planning control. Kent County Council's Heritage Map from 1929 to 1952 and a plan from the 19730171 file (circa 1974) show Stavesacre Cottage to have had a much smaller footprint than it does now;

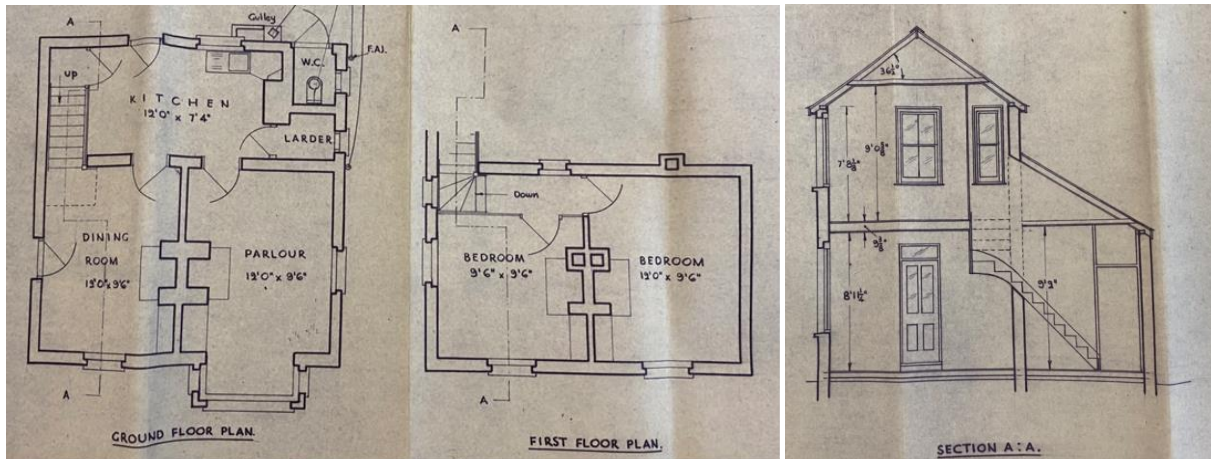


KCC heritage Map



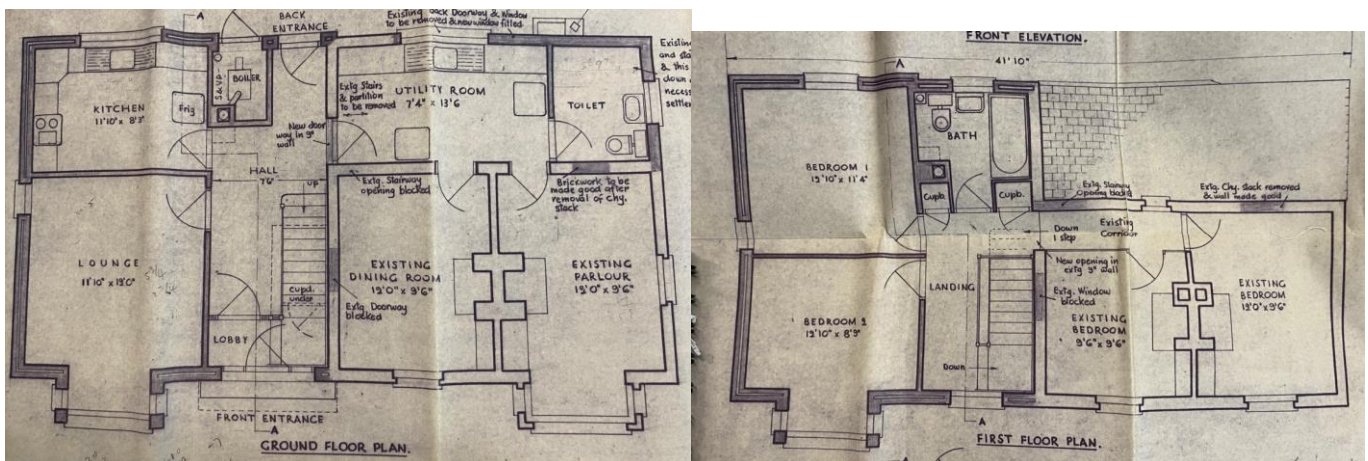
Extract from 19730171 file

The following images are taken from the submitted drawings for planning permission 19730171 and show the original building footprint and elevations;



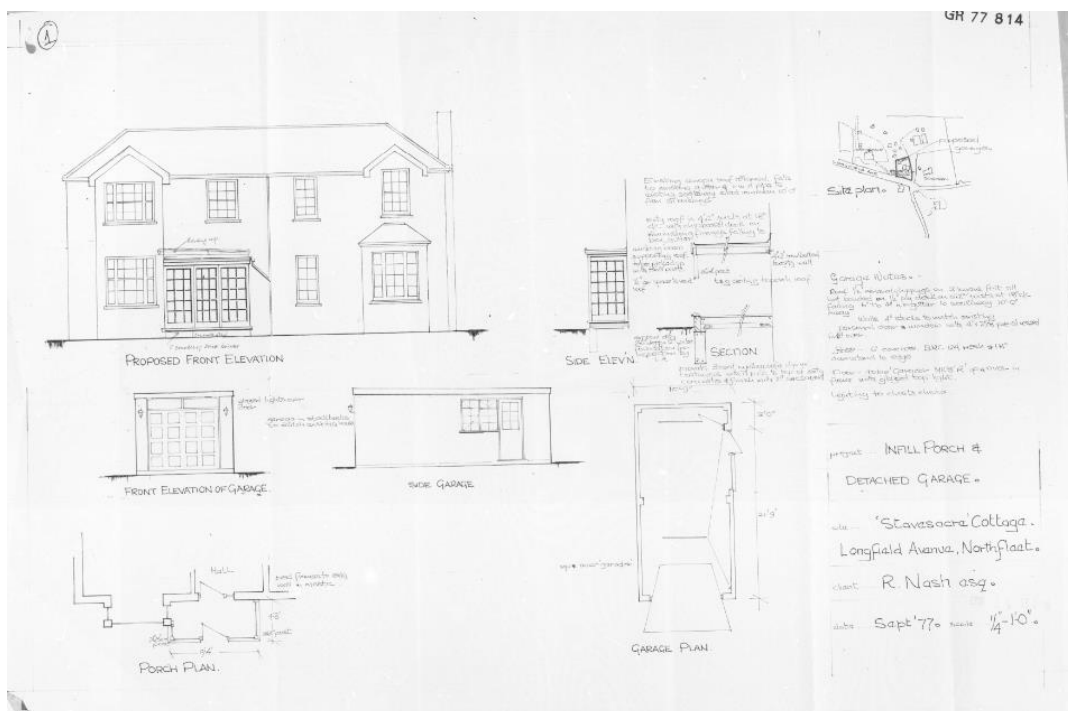
The original building had a floor area of 72 square metres, a height of 7 metres and was a one and half storey dwelling with a hipped roof and a roughly square footprint.

The original building was subject to significant extension under planning permission reference 19730171, which was granted on appeal in 1974. The following images are the approved plans;





The building was further extended under planning permission reference 19770814, which the image of the approved plan below illustrates;



Only the porch added floor area to the building because the garage was detached and located in the rear garden, a significant distance away from the rear of the building.

The historical additions to the building have provided 96.5 square metres of new floor space in total and represent a 134% increase above the size of the original building.

It should be noted that in 2019, a lawful development certificate (reference 20190565) and a planning permission (reference 20190908) were granted for first floor rear extensions to the application property but neither have been implemented and have therefore lapsed.

The proposed development would add a first floor rear extension to the building; a new roof incorporating two front dormers, a large rear dormer and two gable ends; an increase in the height of the chimney on the eastern side; and provide extended habitable accommodation within the new roof space. The proposal would increase the floor area of the building by 89 square metres. Cumulatively with the existing extensions, the floor area of the building would be increased by 185.5 square metres or be 258% above the size of the original building.

As a general rule in the Green Belt, the Borough Council considers that extensions which exceed the overall floor area of an original building by one third (33%) or more, are likely to be disproportionate additions. However, in determining this issue, the Council will have regard to a range of factors including footprint, floorspace, volume, height and any other changes in built form. In addition, the proportion of the site that is developed/undeveloped and the distribution of development/hard standing and open space across the application site will be considered.

The increase in floor area proposed would be significantly in excess of the one third limit set out in Saved Policy C13 of the Gravesham Local Plan First Review November 1994. In terms of bulk and massing, it is considered that the proposed development would add significantly to the appearance of the building. The first floor of the building would be enlarged and the roof would become much taller and bulkier. The building would have an overall height of some 8.4 metres, which when compared to the original roof height of 7 metres, is a significant increase.

There are existing outbuildings and a raised patio area (hardstanding) at the application site, which would be retained.

Cumulatively the floor area, bulk and mass of the property would be significantly increased by the proposed development. Therefore, it is considered that the proposed development would result in disproportionate additions to the original building. As such, the proposal would be inappropriate development, which would be harmful to the openness of the Green Belt and contrary to Policy CS02 of the Gravesham Local Plan Core Strategy September 2014, Saved Policy C13 of the Gravesham Local Plan First Review and paragraph 149(c) of the NPPF 2021.

Effect on the openness of the Green Belt

Paragraph 137 of the NPPF 2021 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. Paragraph 001 of the Planning Practice Guidance on Green Belts looks to assess the impact of a proposal on the openness of the Green Belt by taking into account the spatial and visual aspects of a development, its duration and remediability, and the degree of activity levels generated (Reference ID: 64-001-20190722).

There is no specific definition of "openness" in the NPPF 2021, and the concept of what is considered as openness has only really emerged from case law. Effectively, 'openness' is epitomised by the absence of built development (i.e. land that is not built on) and it follows therefore that any new built development is likely to have an adverse impact on the openness of the Green Belt, but whether that impact is greater or lesser on sites where there is already built development will be dependent on an assessment on a case by case basis. It is a different concept to "visual impact". Although openness may be considered in a visual

sense, the visual impact of a development in the Green Belt may be harmful through the siting, design and materials used. The presence of landscaping or screening may serve to mitigate the visual impact of a development including built development but there might still be an impact on openness.

The development, by its nature, would involve a form of inappropriate development at the application site that would erode the openness of the Green Belt. The proposal would result in building which is significantly larger and bulkier than the original dwelling, consolidating and extending the level of built development at the application site, to an unacceptable level. Whilst the site is partially screened by mature vegetation, the proposed building would be visible from Longfield Avenue;



Overall, the proposed development would significantly and harmfully impact on the openness of the application site and the Green Belt within which it sits. The proposal is contrary to paragraph 137 of the NPPF 2021 by its impact on openness and would also conflict with paragraph 138(c) of the NPPF 2021, which seeks to safeguard the countryside from encroachment. Clearly, this proposal would represent an encroachment of development into the countryside, as the site lies outside any settlement boundary.

Effect on the character and appearance of the area

The application site is located in the Instead Arable Farmlands Landscape Character Area (LCA) and as such, Policy CS12 of the Local Plan Core Strategy is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications.

The Instead Arable Farmlands LCA is characterised by gently undulating topography with open arable fields, orchards to the east, some native woodland, clusters of properties and farmsteads, large pylons and the modern Instead Rise housing development. The overall condition of the landscape is poor and it has moderate sensitivity. The document recommends the restoration of distinctive landscape features and patterns.

It is noted that there would be no loss of vegetation and that the residential nature of the application site would be retained. The proposed development would result in a significant increase in the size and bulk of the application property, which would consolidate and extend the level of built development on the plot and in the wider area. However, the alterations would not be harmful to overall landscape quality. Therefore, it is considered that the proposed development would not be detrimental to landscape character and would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

Paragraph 130 of the National Planning Policy Framework 2021 (NPPF) sets out various design requirements and includes the need for the development to add to the overall quality of an area; be visually attractive; and be sympathetic to local character, including the surrounding built environment. Paragraph 134 of the NPPF states that development that is not well designed should be refused, especially where it

fails to reflect local design policies and government guidance on design.

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area. In particular the design of new development should be derived from a robust analysis of local context and character and make a positive contribution to the street scene and the character of the area.

The Householder Extensions/Alterations Design Guide (2021) states that proposed extensions and alterations to a property should reflect and respect the original character of the building. As a starting point, all residential extensions should be subordinate to the host building, allowing the original building to remain dominant.

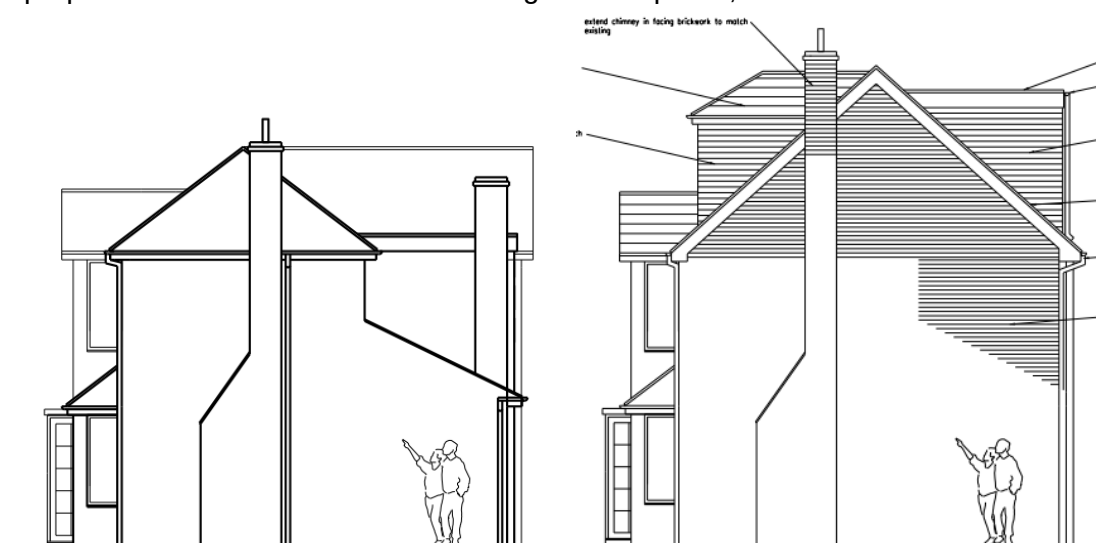
The area surrounding the application site has a variety of dwellings in different types and styles. Located to the west, is a large two storey dwelling (Stavesacre, Longfield Avenue); to the east, is a chalet bungalow (Sheriden, Longfield Avenue) and to the south, across the roadway is, a small bungalow (The Bungalow, Longfield Avenue). Surrounding properties have been subject to numerous extensions and alterations.

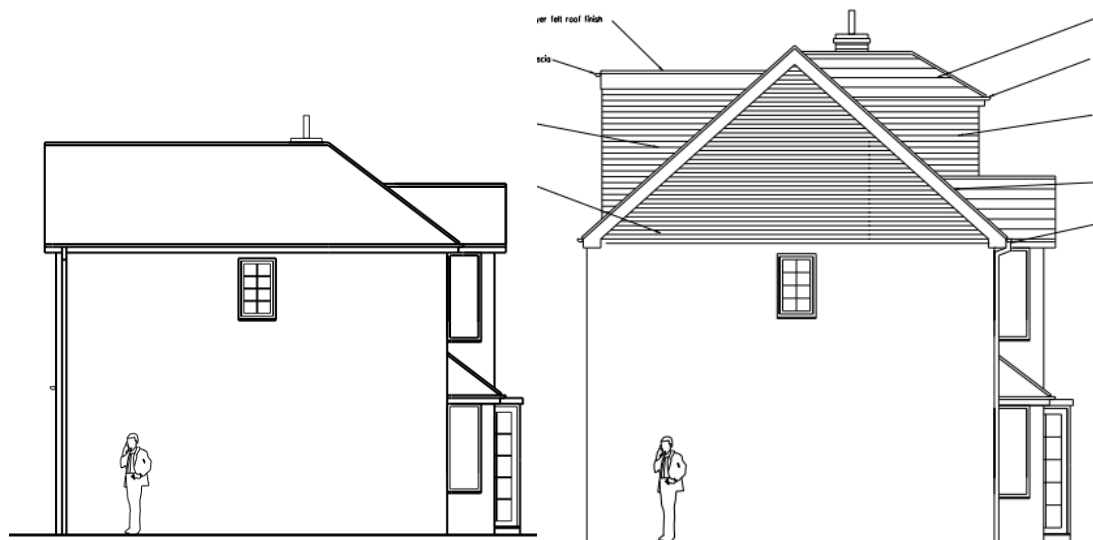
The existing building at the application site is finished with painted render and brickwork, has a tiled, hipped roof and has been subject to some historical extensions that have significantly increased its original floor area.

The design of the proposed development would significantly alter the character of the building. The existing hipped roof would be replaced with a 1.4 metre taller gable end roof, with dormers in the front and rear roof slopes. The front dormers, although relatively large, would have hipped roofs and be subservient to the proposed front roof slope but the rear dormer would be large, with a flat roof and add significant bulk to the rear roof slope.

The proposed external facing materials would match with existing. Whilst out of character with the existing building, the proposal would not look out of place in its surroundings, as neighbouring buildings have a variety of styles and features. In addition, the proposal would remove an existing flat roof on a two storey rear extension. As such, the proposed design has some positive features.

The proposed development would result in a significant increase in the size and bulk of the application property and would result in an unbalanced appearance for the roof. This is especially evident when the existing and proposed side elevations of the building are compared;





The proposed roof would be a substantial, dominating feature of the building, the impact of which would be highlighted by the inclusion of front and rear dormers. Cumulatively the proposed alterations would be an overdevelopment of the host building, undermining its character and be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Other matters

Amenity of Future Occupiers

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants. In this regard, the Nationally Described Space Standards (NDSS) and the Borough Council's adopted Residential Layout Guidelines (RLG) are relevant.

The proposed bedrooms would exceed the minimum floor area requirements set out in the Nationally Described Space Standard (2015) and there would be no alteration to the existing garden, which exceeds the requirement for a dwelling with four or more bedrooms in the Residential Layout Guidelines (June 2020). As such, the proposal would provide a good standard of living for future occupiers and be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Neighbouring Amenity

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring occupiers and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

The closest residential properties to the application site are Stavesacre and Sheriden, Longfield Avenue (located to the west and east respectively). The Bungalow, Longfield Avenue is located to the south across the roadway.

Due to the design of the proposed development, to the screening provided by boundary treatments and to the layout and orientation of the surrounding properties, there would be no adverse overlooking, overshadowing or overbearing impacts to the occupiers of the surrounding dwellings.

Overall, the proposed development would not be detrimental to the residential amenity of surrounding occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Parking and Highways

Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policies T1 and P3 of the Gravesham Local Plan First Review November 1994 require new development to mitigate its impact on

the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards.

The proposed development would result in the dwelling increasing from four bedrooms to six (the proposed dressing room has sufficient space to be used as a bedroom and should be determined as such) and there would be no alteration to the existing parking or access arrangements (which can accommodate at least three vehicles).

The GBC Highways Officer has not raised an objection but requires the provision of a cycle parking space. However, as sufficient space would be available at the application site to provide cycle parking, should the applicant wish to provide it, then there would be no need to condition cycle parking provision in any planning permission granted.

Overall, it is considered that the proposal would make sufficient provision for the parking of cars within the site in accordance with the Borough Council's adopted Vehicle Parking Standards and would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policies T1 and P5 of the Gravesham Local Plan First Review November 1994.

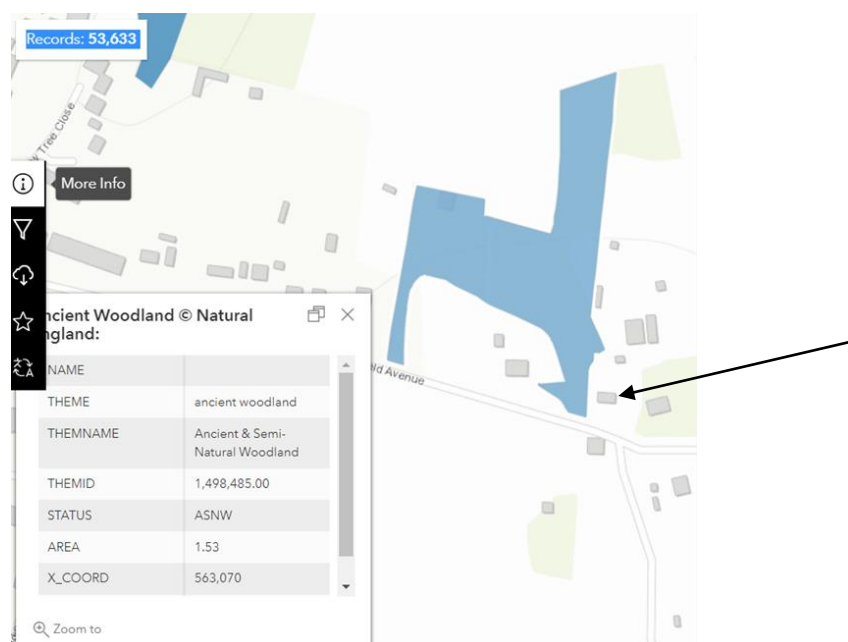
Biodiversity

Paragraph 174 of the NPPF (2021) requires development to contribute to and enhance the natural and local environment by (amongst other things) protecting and enhancing valued landscapes and sites of biodiversity value (in a manner commensurate with their statutory status or identified quality in the development plan) and minimising impacts on, and providing net gains for, biodiversity.

Paragraph 180 of the NPPF (2021) sets out a number of principles that should be applied to the determination of planning applications in relation to protecting habitats and biodiversity. These include refusing development that results in the loss or deterioration of irreplaceable habitats (such as ancient woodland) unless there are wholly exceptional reasons and a suitable compensation strategy exists and ensuring opportunities to improve biodiversity in and around developments are integrated as part of their design, especially where this can secure measurable net gains for biodiversity.

Policy CS12 of the Gravesham Local Plan Core Strategy 2014 states that there will be no net loss of biodiversity in Gravesham and that sites designated for their biodiversity value will be protected.

The application site (highlighted with an arrow) is located immediately adjacent to ancient woodland;



The KCC Biodiversity Officer has highlighted that habitats and features are present, on and around the site, indicating ecological value and that there is the potential for protected species to be present. Therefore, an ecological impact assessment is required. However, as there is an in principle objection to the proposed development, the applicant has not been asked to provide an ecological assessment at this time.

In the absence of an ecological assessment, it is not possible to determine the impacts of the proposed development on existing ecological features or biodiversity or to outline any measures to mitigate any potential adverse impacts associated with the proposal.

Overall, by virtue of the lack of ecological information, the proposal would have the potential to be detrimental to protected ecological features and biodiversity and as such, it would be contrary to Policy CS12 of the Gravesham Local Plan Core Strategy (2014) and to paragraphs 174 and 180 of the NPPF 2021.

Climate change

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to take advantage of opportunities to build in resilience to the effects of climate change. No details have been provided by the applicant in this regard.

To ensure that climate change resilience forms part of the proposed development, a planning condition can be included to this effect, on any planning permission granted. As such, the proposed development would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Very Special Circumstances

Referring to paragraphs 147 and 148 of the NPPF 2021, inappropriate development in the Green Belt should not be approved except in very special circumstances and that very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

The applicant has not identified any very special circumstances. However, it would be relevant to consider the implications of the previous planning permission/lawful development certificate granted for a first floor rear extension at the application property. Planning permission 20190908 was granted based on the fallback position provided by lawful development certificate 20190565 (the proposal was considered to be a disproportionate addition but justified by very special circumstances). The permitted extension would have added the same floor area as the first floor extension element of the current proposal and therefore the previous permission provides some justification for that aspect of the current application. However, it should be noted that the permitted first floor rear extension had a flat roof and a small gable end (to match that existing on the rear elevation) but there was no alteration to the existing main roof. As such, it does not provide any justification for the currently proposed roof design. In addition, as the LDC and the planning permission have both now lapsed, their relevance to the determination of this proposal is lessened.

The applicant has recently submitted an application for a similar first floor rear extension to that permitted under 20190908. But in the absence of a determination, this does not carry significant weight. Furthermore, the proposed development is much greater than just a first floor extension and there is no fallback or other argument that would justify the rest of the proposal.

Overall, it is considered that there are no very special circumstances that would set aside the objection to the development on grounds of being inappropriate development.

Conclusion & Balancing Exercise

The above analysis sets out that the proposed development would be detrimental to the openness of the Green Belt and contrary to one of the purposes of including land within the Green Belt, namely protecting the countryside from encroachment. The development would be a disproportionate addition to the building, consolidate and extend the level of built development at the application site to an unacceptable

level and be inappropriate development in the Green Belt.

No very special circumstances have been advanced pursuant to paragraphs 147 and 148 of the NPPF 2021 sufficient to overcome the presumption against such inappropriate development.

In addition, the proposal would be an overdevelopment of the host building, which would undermine its character and have the potential to be detrimental to protected ecological features and biodiversity.

The proposed development would provide a good standard of living for future occupiers, would not be detrimental to the surrounding landscape, residential amenity or highway safety. All of which weigh in support of the proposal.

On balance, it is considered that the benefits of the proposal are significantly and demonstrably outweighed by the significant harm to the openness of the Green Belt, to the character of the building and to ecology/biodiversity.

Recommendation

Refusal on the following grounds;

- (1) The proposal, by virtue of its proposed size, scale, massing and form, would be inappropriate development in the Green Belt, as it would result in disproportionate additions over and above the size of the original dwelling and harm the openness of the Green Belt. In the absence of any very special circumstances to clearly outweigh the harm to the Green Belt, the proposal would be contrary to Policy CS02 of the Gravesham Local Plan Core Strategy September 2014, Saved Policy C13 of the Gravesham Local Plan First Review and to Section 13 of the National Planning Policy Framework 2021.
- (2) The proposed roof would be a substantial, dominating feature of the building, the impact of which would be highlighted by the inclusion of front and rear dormers. Cumulatively the proposed alterations would be an overdevelopment of the host building, undermining its character and be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 and paragraph 130 of the National Planning Policy Framework 2021.
- (3) Given the site's location adjacent to an ancient woodland, the proposal has the potential to adversely impact upon protected ecological habitats/species. In the absence of any ecological assessment, it is not possible to determine whether the proposal would protect the biodiversity value of these habitats/species. As such, the proposal is contrary to Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 and to the paragraphs 174 and 180 of the National Planning Policy Framework 2021.

(For detailed informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	06 July 2023	Dated:	06 July 2023