

Delegated Report

Application No: 20211535

Location: Dawes Cottage, Northfleet Green, Gravesend DA13 9PN

Description: Retention of existing games and family room, whilst carrying out alterations to reduce the size of the existing building.

Applicant: Mr And Mrs P Martin

Site Visit Date: 9 March 2022

Submitted Documents/Plans

The application comprises the following documents and plans:

Application form received 10 December 2021.
Planning Statement received 10 December 2021.
Supplementary Planning Statement received 10 December 2021.
Drawing no. 02 (location plan) received 10 December 2021.
Drawing no. 03 (existing plans) received 10 December 2021.
Drawing no. 04 (proposed plans) received 10 December 2021.

Relevant Planning History

20190280	Retention of a single storey building for leisure and a games room.	Refused, appeal dismissed	12.06.2019
AP 2019/00062/ENF	Appeal against the Enforcement Notice relating to the erection of a single storey building in use for leisure purposes including a games room without the benefit of planning permission.	Appeal Dismissed	29.07.2020
20190268	Application for a Lawful Development Certificate in respect of the retention of a single storey side extension on the southern side.	Certificate granted	12.06.2019
20150007	Demolition of existing residential annexe and erection of a detached, four bedroom chalet bungalow.	Refused	24.06.2015

20140643	Application for a Lawful Development Certificate in respect of the existing hard surface area (poured concrete) in front garden with provisions to direct run-off water to a porous area.	Certificate granted	15.09.2014
20140450	Continued use of the land for the keeping of horses and livestock including the erection of a hay barn and block of 2 stables with tack room, retention of vehicular access onto Northfleet Green Road and associated concrete hard standing and retention of 2m high close boarded fence to western boundary.	Permitted	22.12.2014
20030661	Application for the variation of condition (v) of planning permission ref. no. TH3/70/248 relating to the erection of one detached and one pair of semi-detached houses for agricultural workers, which restricts the occupancy of the property to an agricultural employee.	Permitted	22.09.2003

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 - Design & Development Principles

Paragraph 33 of the National Planning Policy Framework (2021) sets out those 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 The review 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 a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the National Planning Policy Framework (2021), the Council will also seek to replace these saved policies via the emerging Local Plan.

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- P3 – Vehicle Parking Standards

Other material considerations

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

Supplementary Planning Guidance

- SPG2 - Residential Layout Guidelines (2020)
- SPG 4 - KCC Parking Standards (2006)
- Householder Extensions/Alterations Design Guide (2021)
- Landscape Character Assessment (2009)

Human Rights Act 1998:

In the analysis of the planning issues and the subsequent recommendation, where relevant, consideration has been given to the Human Rights Act, and it is concluded that any breaches or interference to human rights are reasonable, proportionate, and fair.

Article 6 (“fair public hearing”): provided by Town & Country Planning legislation, Regulatory Board consideration, planning appeal, legal challenge;

Article 8 (“respect for private and family life, home and correspondence”): gives everyone the ‘right to respect’ for his or her home but not right to a home. The applicant’s and their child has a home, this is respected and there is no breach;

Article 1 of the First Protocol (“peaceful enjoyment of possessions”): breach proportionate and justified, by reason of the general interest.

Article 14 states:

The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status. The application has been determined in line with local and national policy taking into account the personal circumstances of the applicant. There is no breach.

Consultations, Publicity and Representations

GBC - Environmental Protection Team (Regulatory Services)

Please apply Code of Practice on Construction and Demolition informative.

KCC Heritage

I have no comments on archaeological matters.

GBC - Highways Officer

Subject to the proposal being restricted to being ancillary to the occupation of the main dwelling with no commercial activity I have no objections

KCC - West Kent Public Rights Of Way Officer

Public Rights of Way NU28 runs to the south of the site and may be affected by the application, and I therefore enclose a copy of the Public Rights of Way network map showing the definitive line

of this path for your information.

It is important to advise the applicants that a public right of way must not be stopped up, diverted, obstructed or the surface disturbed and there must be no encroachment on the current width, at any time now or in future. This includes any building materials or waste generated during any of the construction phases. Please note that no furniture or fixtures may be erected on or across Public Rights of Way without the express consent of the Highways Authority.

Neighbouring properties

The application has been advertised by site notice, press notice and individual letters to three neighbouring properties. No letters of representation have been received.

Analysis

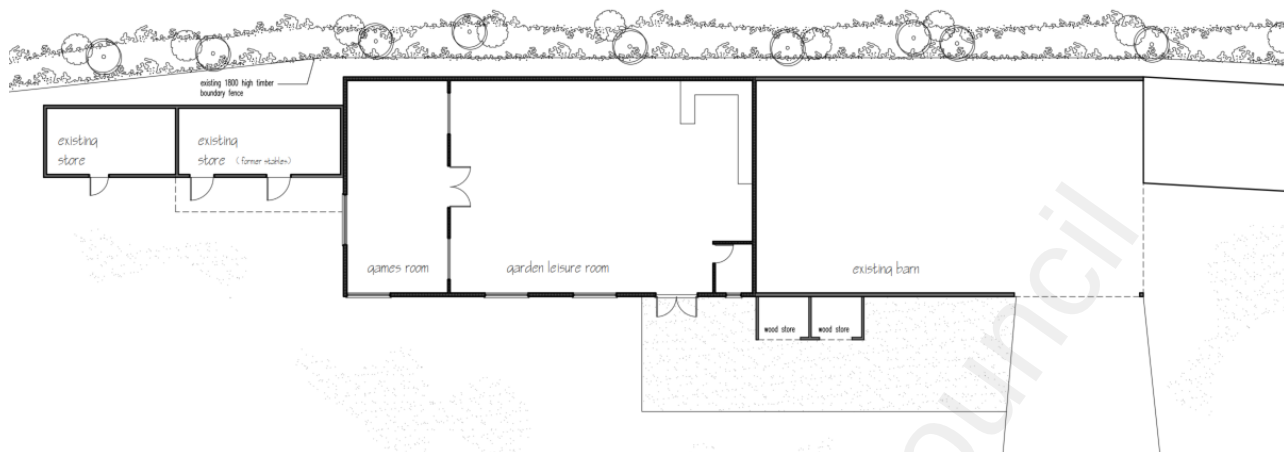
Proposal

This application seeks planning permission for the retention of existing games and family room, whilst carrying out alterations to reduce the size of the existing building:



The current building is shown below:





The proposed changes reduce the width of the building by approx. 2.13m. The height remains the same and the internal layout remains the same save for a reduction in size of the games room element.

The applicant's agent in his Planning Statement says that the application constitutes a re-submission of refused application 20190280. He goes on to say that it is considered the need of this building for the applicant's disabled son was not detailed sufficiently in the previous application and that this current application does this.

The Planning Statement goes on to say that the proposal seeks retrospective consent for the erection of a single storey leisure room within the curtilage of Dawes Cottage for use which is considered incidental to the main dwelling (para. 3.1.2). It has already been determined by the Planning Inspectors and the Council that the land upon which the building is located is not within the residential curtilage of Dawes Cottage and therefore is not incidental to its use as a residential property.

Background:

20190280 sought planning permission for the retention of a single storey building for leisure and a games room. The building is approx. 17.7m long, 9.8m wide, 3.2m high with a pitched roof. The building contains a gym, games room, kitchen area and WC. The building is located on land adjacent to Dawes Cottage which has permission for the land to be used for horses and livestock. Permission was granted for the use under reference 20120475 which also included the erection of 4 no. stables, tack room, hay barn and 3 no. chicken coups. In 2014 an application was received to regularise development that had not been built in accordance with the approved plans (20140405). It is worth noting that an application to change the use of the land from agricultural to residential amenity land was refused on 18 October 2010.

20190280 was refused on 12 June 2019 for the following reasons:

- 1 The application site is within the Metropolitan Green Belt where inappropriate development should not be approved except if it meets the exceptions of paragraph 145 or 146 of the NPPF or if very special circumstances exist. The existing development does not meet any of these exceptions and amounts to inappropriate development by virtue of having a greater impact on the openness of the Green Belt, and the purpose of including land within it, than the existing lawful use of the site. The new building has a significant impact on the openness of the Green Belt. Therefore the

development does not preserve the openness of the Green Belt and conflicts with the purposes of including land within the Green Belt as it will encroach into the countryside. In the absence of any 'very special circumstances' that may otherwise outweigh the harm by reason of inappropriateness, and any other harm, the development is contrary to national planning guidance contained in paragraphs 133-147 of the National Planning Policy Framework (2019) and policy CS02 of the Borough Council's adopted Gravesham Local Plan Core Strategy (September 2014).

- 2 The site is within the Istead Arable Farmlands designated landscape character area and the new building is detrimental to the landscape by introducing inappropriate development which will result in visual harm by suburbanising the site. The development is contrary to Policy CS12 of the Borough Council's adopted Gravesham Local Plan Core Strategy (September 2014) which seeks to give long term protection to these areas.

The appeal (APP/K2230/W/19/3232367 – appendix 1) was dismissed on 3 December 2019. The Inspector made the following comments:

The land upon which the building is located is for leisure and recreational use only and planning permission 20040450 was clear in its informative that the permission 'shall not be construed as granting permission for the extension of the residential curtilage of the dwelling'. The conditions clearly state that the land shall be used for the keeping of horses and livestock only and not for any other purpose. The building was not considered to be used in association with, and ancillary to, the residential use of Dawes Cottage. The Inspector goes on to say 'the building has no functional relationship with the use of the land for the keeping of chickens and others. Other buildings on site already provide that facility'. She therefore remained unconvinced that the building constituted an appropriate facility in connection with the use of the land on which it is sited.

If it were considered appropriate then the NPPF requires that facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. The appellants argued that the building replaced one that was located within the residential curtilage. The Inspector was clear that the site is within an area outside of the domestic curtilage on a separate parcel of land which itself is in a different use. No evidence was provided that there was a building on this site and therefore the proposed could not be considered a replacement building.

The development resulted in additional built form in an undeveloped part of the site. This increased the overall bulk and reduced the openness of the Green Belt. On this basis the proposal was not considered an exception within para. 145 b and did not fall within para. 145 d or any other categories in paragraphs 145 or 146 (NPPF 2019).

The building was also considered to have an urbanising effect on the open rural landscape which diminishes the character and appearance of the area and therefore conflicted with Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

The Inspector did refer to 'very special circumstances' and stated that 'the reason for building the appeal development outside the residential curtilage was to provide a larger grassed amenity area for the applicant's disabled son, within the residential curtilage of the property. Be that as it may, this does not justify the construction of a domestic building on the adjoining land.'

An enforcement notice was issued on 16 September 2019 which required the building and associated rubble to be removed within six months. This enforcement notice was upheld at appeal but the time for compliance was amended to 12 months (APP/K2230/C/19/3239111 – appendix 2).

The Inspector agreed with the previous Inspectors findings that there 'is nothing to suggest that this building is required in conjunction with the use of the land for horses and livestock.' He agrees that the development does not constitute an appropriate facility in connection with the lawful use of the land.

This Inspector also referred to the appellant's assertion that the building was constructed to provide a safe place for his disabled son who has complex and challenging medical needs. Regarding this issue he said:

21. The appellant advises that games room building was constructed to provide safe place for his disabled son, who has complex and challenging medical needs. The building allows the appellant's son to feel safe and secure and provides a safe environment for the extended family to visit him. The appellant also advises that the building was placed outside of the grounds of Dawes Cottage, to ensure that a large grassed area remained within the garden for their son. Consequently, the provision of the games room is in the appellant's son's best interests; The best interest of the child is of a primary consideration.

22. Furthermore, in light of the enforcement notice I recognise that the failure of this appeal would result in the demolition of the games room building used by the appellant's family and son. This would represent an interference with their rights under Article 8 of the European Convention on Human Rights, as incorporated by the Human Rights Act 1998.

23. I have considerable sympathy with the appellant's personal circumstances and can fully appreciate why he would wish to retain the building for his family members. Nevertheless, Dawes Cottage is a detached two storey dwelling set within spacious grounds, and I have not been provided with any substantive evidence to explain why a suitable ancillary building could not be accommodated within the curtilage of Dawes Cottage. Indeed, the Council have advised they have no objection to the principle of such a games room building within the grounds of Dawes Cottage, which complies with the Town and Country Planning (General Permitted Development) Order 2015 (GPDO).

24. Furthermore, the evidence submitted does not explain why the leisure/games room needs to be of the size constructed, and why it needs to contain the range of facilities provided which includes an open plan kitchen/ living area in addition to the playroom.

25. Due to the above factors, there is limited evidence before me to suggest that the removal of the building would have a disproportionate effect on the best interests of the appellant's son when weighed against the planning harm set out above. As a result, I can only give the appellant's personal circumstances modest weight in my decision.

Impact on the Green Belt and the Countryside

The application site is located within the Green Belt and the open countryside.

Saved Policy C13 of the Gravesham Local Plan First Review 1994 relates directly to residential development and says 'proposals for domestic garages and for other outbuildings will be considered on their individual merits but will be required to be well designed, discreetly sited and subservient to the scale of the main dwelling on the plot'. This Policy does not apply to this application as the building is not located on the same plot as the main dwelling and is outside of the residential curtilage. This was also found to be the case by both Planning Inspectors in their appeals.

Policy CS02 of the Core Strategy 2014 states that development will be supported where it is compatible with national policies for protecting the Green Belt and policies in the Core Strategy

2014.

Paragraph 137 of the NPPF states that the fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open, with their essential characteristics being their openness and their permanence.

Paragraph 138 of the NPPF states that the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In addition to the above five nationally defined purposes of the Green Belt, Policy CS02 of the adopted Gravesham Local Plan Core Strategy states that the local purposes of the Green Belt will be maintained. Paragraph 4.2.7 of the document sets these purposes as being:

- to maintain the break in development between the eastern edge of Gravesend and the Medway Towns which is one of the few barriers preventing the further eastward sprawl of London and the merging of towns along the southern part of the Thames Estuary;
- to assist in safeguarding the countryside by minimising the expansion of the Borough's rural settlements; and
- to assist in concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet.

Paragraph 147 of the NPPF sets out that 'inappropriate development' is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 148 of the NPPF advises that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. '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.

Any development in the Green Belt is inappropriate unless it falls within one of the exceptions set out in the closed lists contained in paragraph 149 of the NPPF. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) 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;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Use of the land

The submitted Planning Statement says that, to the north of the site, is a piece of land that is used as ancillary to the residential property. This is not true and the Inspectors in their appeal have made clear that this land is recreational for the keeping of horses and livestock only and is not in any way ancillary to the residential use of the property. The informative applied to the permission (20140450) for the use of the land stated:

'the land hereby permitted is for leisure and recreational use only and shall not be construed as granting planning permission for the extension of the residential curtilage of dwelling'. The conditions attached to this decision also clearly state that the use of the land shall be for the keeping of horses and livestock only and shall not be used for any other purpose.'

The applicants in their appeal justified the significant size of the building by stating that it merely replaced a larger building that was in the side garden of Dawes Cottage. The Inspector was clear on this matter:

(10) While I acknowledge that the keeping of horses and livestock may be a recreational activity, the building for which permission is sought is used as a games room in association with, and ancillary to, the residential use of Dawes Cottage. The appellants advise it was constructed to replace a similar facility within the garden of the cottage. The building has no functional relationship with the use of the land for the keeping of chickens and horses. Other buildings on site already provide that facility. (11) I am unconvinced therefore, that it constitutes an appropriate facility in connection with the use of the land on which it is sited (APP/K2230/W/19/3232367 – appendix 1).

Within previous applications for the same development the applicants have stated that the building in the Green Belt is not inappropriate development stating that it meets exception a) buildings for agriculture and b) the provision of appropriate facilities (in connection with the existing use of land or change of use) for outdoor sport or outdoor recreation provided that they preserve the openness of the Green Belt and do not conflict with the purpose of including land within it.

However, within this application they are relying purely on the special needs of the applicant's son.

For clarification purposes it is the Council's and the Planning Inspector's view that the building is not considered to meet exception point (a) of para. 145 as the land is not in agricultural use. The building contains a kitchen, a bar, display units, a play room and WC and there is no evidence that this is required in conjunction with the use of the land for horses. There are already buildings on the site for any horses that the applicant keeps. It therefore does not meet exception point (b) of para. 145. Whilst the applicant refers to the land as outdoor recreation, this is ancillary to the main house, and the facilities are not considered appropriate to the use. The facilities do not preserve the openness of the Green Belt and conflict with the purposes of including land within it. Equally, the building cannot be described as being ancillary to the main dwelling as it is not within the residential curtilage.

The argument that the loss of the outbuilding that has been demolished within the curtilage of Dawes Cottage negates the harm that the new building causes is not applicable in this instance because outbuildings within residential curtilages are not uncommon however, multiple large buildings on open recreational land would result in significant harm on the openness on the Green Belt. The applicants have offered to demolish part of the building to increase openness however, it is the Council's view that the building as a whole is unacceptable and should be demolished rather than just a small part of it. The applicants have repeatedly stated that a building could not be provided within the curtilage of the dwelling because they require open space for their son within their garden. However there are numerous outbuildings and a caravan within the curtilage of the dwelling that could be removed to facilitate a building for their son:



The applicant's agent accepts that the building would be considered inappropriate development unless very special circumstances exist which are sufficient to outweigh the harm to the openness of the Green Belt (para. 5.2.6).

Very Special Circumstances

Para. 148 of the NPPF states that 'when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'

The site is currently used as a specific facility for the applicant's son to enjoy. Para. 5.2.8 states that 'because of the very specific needs of our client's child, having a place within a quiet location, where he feels safe is particularly important. This part of the site is best suited in this regard'.

The building contains a room for computer games, a lounge area with two different areas with sofas, poker table, foosball table, glass display cabinets, dining table, fully fitted kitchen/bar area and toilets which raises concerns regarding the suitability of such a building for a child with complex needs. The applicant confirmed that the building is used by the child under supervision and there are cctv cameras in the building. Aside from the computer games there is little evidence that the majority of this building is used for a child. There is no justification for the building to be the size that it is and a smaller building could be accommodated within the curtilage of the main dwelling.

Safeguarding

The applicant's agent asserts that the applicant's son needs a 'place of safety' in the event that the family have friends or family visit.

The agent refers to the document 'Working Together to Safeguard Children (2018) and Local Safeguarding. This document applies to all organisations and agencies who have functions relating to children and applies to all children up to the age of 18.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Safeguarding clearly relates to a child having a safe and secure environment from potential maltreatment. It is not intended to be used as a reason to justify built development in the Green Belt as this would not even be a possibility for most children who are at risk.

The Council has considered the welfare of the child in safeguarding terms and has concerns, due to the list of medical conditions supplied, that a detached building away from the main dwellinghouse on a separate parcel of land actually raises concerns regarding safeguarding rather than allays them. This was raised with the applicant who confirmed the child uses the building with an adult present or the CCTV cameras are on to supervise.

Human Rights Act 1998

The council consider that there has been no breach as mentioned above in 'Other Material Considerations' section. The Planning Inspector in the enforcement appeal also dealt with this matter as mentioned above in the 'Background' section of this report.

In the case of *Stevens v Secretary of State for Communities and Local Government* the judge dealt with the clash of the two principles – how to resolve the policy-driven field of planning with the rights of family under Article 8 of the Human Rights Act and under Article 3 of the UN Convention on the rights of the Child. The outcome of the case was that the best interests of the child shall be a primary consideration (not *the* primary consideration) and that it is for the Court, not for an administrative decision-maker such as the planning inspector, to decide how those interests could be squared with other planning considerations.

Within this application the needs of the child have been considered and it is felt that, those needs can be accommodated within the curtilage of the residential dwelling. There are no special circumstances to build within the green belt to meet these needs.

No special circumstances that outweigh the public interest have been given to justify the need for this large building in the Green Belt and there are no exceptional circumstances to allow this building. It is large and detrimental to the openness of the Green Belt and contrary to para. 145 of the NPPF, Policy CS02 of the Core Strategy 2014.

Character and Appearance

The application site is located within the Istead Arable Farmlands in the Gravesham Landscape Character Assessment. The topography is gently undulating allowing wide, open views out towards the urban edge of Gravesend and the CTRL to the north. To the northwest the landscape is dominated by open arable agricultural land divided by tracks and roads. To the south east there

are native hedgerows and occasional poplar belts. The fields are medium to large and form a regular pattern with boundaries running distinctly from north to south and east to west.

The condition of the landscape is considered poor due to the dominating electricity pylons which are a significant visual detractor within the landscape. The guidelines aspire to restore distinctive features and create landscape elements that support the landscape character. The large building which is the subject of this application does not restore distinctive features; it introduces further built development on a site that has been granted permission to be for open recreation. This view was shared by the Planning Inspectors in both appeals. The modest reduction in the width of the building is not considered to overcome these concerns.

The proposal therefore conflicts with the objectives of the Landscape Character Assessment 2009 and Policy CS19 of the Core Strategy 2014 and para. 134 of the National Planning Policy Framework 2021.

Amenity of Future Occupiers

As the building is not located within the residential curtilage of the main dwelling there will be no loss of outside space and no impact on the amenity of future occupiers.

Neighbouring Amenity

The building is not within close to any neighbouring property and therefore raises no concerns in terms of loss of outlook, privacy, sunlight or daylight and therefore the proposal complies with Policy CS19 of the Core Strategy 2014 and para. 130f of the National Planning Policy Framework 2021.

Parking and Highways

No objection is raised on highways grounds.

Conclusion

To conclude, the proposal is inappropriate development in the Green Belt, which is, by definition, harmful to the Green Belt. It also causes limited harm to the openness of the Green Belt. The Framework requires that substantial weight is given to any harm to the Green Belt 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.

Despite having regard to all the other considerations, it is considered that taken together, the factors cited in its favour do not clearly outweigh the harm the scheme has caused. Consequently, very special circumstances do not exist, and the proposal conflicts with the Framework and Policy CS02 of the Core Strategy.

However, the building exists for now and the harm is done. Although special circumstances do not exist, the personal circumstances of the applicant's child have been clarified and further medical information from his GP and Social Worker have been obtained. Both have expressed concern regarding the impact of the demolition of the building on his mental health. Given his physical health and mental health concerns, it is felt reasonable to offer a window of opportunity to provide for alternative accommodation to be found for the child. It is felt that a period of three years would be a reasonable amount of time to do this and also would ensure the space remains available to him until adulthood (aged 18). Therefore it is felt reasonable to grant a temporary consent to allow the child to enjoy the building for three more years and after this time, as directed by the Planning Inspector in the enforcement appeal, the building shall be removed.

Information was provided about the disability of the family member and the council has had due regard to the Public Sector Equality Duty (PSED) contained in section 149 of the Equality Act 2010, which sets out the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it. Nevertheless, for the reasons set out above, it does not follow from the PSED that the application should succeed.

Recommendation:

Temporary consent

See draft Decision

Case Officer: AW	Team Leader: Richard Hart
Signed: 	Signed: <i>R Hart</i>
Dated: 7 June 2022	Dated: 14 th June 2022