

Regeneration and Economic Development Department

APPLICATION NO: 21/00913/FUL

APPLICANT: Mr A Hassan

WARD AFFECTED: Halewood North

DEVELOPMENT: CHANGE OF USE OF FITNESS STUDIO TO HOT FOOD TAKE AWAY AND INSTALLATION OF EXTRACTION EQUIPMENT TO THE REAR

LOCATION OF SITE: L25 Fitness , Merrivale Road, Halewood, L25 5NA

KNOWSLEY LOCAL PLAN ALLOCATION –

Primarily Residential Area

RELEVANT POLICIES

National Planning Policy Framework

KNOWSLEY LOCAL PLAN: CORE STRATEGY

CS2 - Development Principles

CS6 - Town Centres and Retail Strategy

CS7 - Transport Networks

CS19 - Design Quality and Accessibility in New Development

CS26 - Waste Management

SAVED POLICIES - KNOWSLEY REPLACEMENT UNITARY DEVELOPMENT PLAN (ADOPTED JUNE 2006)

DQ2 - Security in the Built Environment

ENV2 - Noise and Vibration

H5 - Development within Primarily Residential Areas

S2 - Diversification of Uses within Existing Centres

S7 – Local Centres and Parades

T10 - Access for the Less Mobile

The Joint Merseyside and Halton Waste Local Plan 2013

WM9 - Sustainable Waste Management Design and Layout of New Development

Supplementary Planning Documents

Town Centre Uses SPD (June 2016)

TECHNICAL CONSULTATIONS:

Halewood Town Council - No Comments Received

Highway Authority - Advise that some off-street parking space is provided to the front of the units, however, highways are aware that these parking bays can often become full. Vehicles then park on the surrounding pavements and carriageway as an alternative. Request that a photographic survey, to assess current parking levels, is secured to determine whether additional vehicles can be accommodated.

Environmental Health - Advise that insufficient information has been submitted to fully assess the proposal in relation to no detail of how smoke / odour control from the hot food takeaway would be controlled; existing flue points down to the ground concerns about odour and noise from the proposed use and their impact on both the residential properties above and the residential properties nearby.

NEIGHBOUR NOTIFICATION:

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

This application has been publicised by letters sent to 47 neighbours. It has also been advertised by Site Notice.

There have been 4 letters of objection, 2 letters of support and 1 letter of comment. The representations are summarised as follows:-

- a) Existing Takeaway Use on parade
- b) Increased Traffic, including from Deliveroo late at night.
- c) Existing speeding traffic in area.
- d) Light Pollution
- e) Odour – existing smells; unit faces downwards which will expel towards the street and in front of existing dwellings and if up towards flats.
- f) Air Quality from impact on from extraction unit.
- g) Anti-Social Behaviour due to gathering of youths who frequent off licence next door.
- h) Litter
- i) Vermin due to food waste.
- j) Do not need any more late night shops in small road.
- k) Visual Amenity of current state of buildings not being kept to a satisfactory standard; rubbish in yards; existing extraction unit on another unit which is an eyesore; units in need of repair
- l) Outlook from existing new houses onto rear of parade.
- m) Noise from existing refrigeration / extraction units is quite loud and additional noise a concern from proposed unit.
- n) Existing bins stored outside on street.
- o) Condition of existing buildings are danger, upper floors in need of repair.
- p) Impact on residential amenity due to view of back of parade.
- q) Devaluation of house.

In regard to the representation received, this relates to the existing state of repair; general lack of security relating to anti-social behaviour and rubbish related issues with the existing shopping parade and the belief that if these issues were addressed may change their opinion but adding another shop at the moment would make issues worse.

In regard to the 2 comments of support, one submission does not expand on their reason for support and the other states: 'It pleases me that it has been allowed to have a takeaway business in the community as the area is need of such business. I strongly recommend the change of use of fitness studio to hot food takeaway.'

With regard to the comment raised at point n) and o) above, the parade is privately owned the points raised are management and liability issues for the landlord(s). These issues together with de-valuation of property at p0 above are not material planning considerations.

One contributor, through comments made via the Council's website, references attached photographs of the condition of the parade, however there is not facility on the Council's Public

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

Access system to attach photographs. Notwithstanding the above, Officer's have carried out their own site visit.

ARTICLE 35

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and determining the application within a timely manner, clearly setting out the reason for refusal, allowing the applicant the opportunity to consider the harm caused and whether or not it can be remedied by a revision to the proposal. The Local Planning Authority is willing to meet with the applicant to discuss the best course of action and is also willing to provide pre-application advice in respect of any future application for a revised development.

ISSUES AND ASSESSMENT:

RELEVANT PLANNING HISTORY

01/00309/COU

CHANGE OF USE OF VACANT SHOP TO HOT FOOD TAKE-AWAY AND INSTALLATION OF NEW SHOP FRONT - 3 Merrivale Road, Halewood

Refused – 29 June 2001

01/00536/FUL

RETENTION OF NEW SHOP FRONT- 5 Merrivale Road, Halewood

Granted 26 October 2001

19/00676/COU

CHANGE OF USE FROM HAIRDRESSERS (USE CLASS A1) TO FORM LADIES ONLY PERSONAL TRAINING FACILITY (USE CLASS D2) (RETROSPECTIVE) - 5 Merrivale Road, Halewood

Granted – 31 January 2020

PROPOSAL

Permission is sought for the change of use from a personal training facility to a Hot Food Take Away and installation of extraction equipment to the rear. The current use falls within Use Class E (d) ((Indoor Sport, Recreation or Fitness) of the Town and Country Planning (Use Classes) Order 1987 (as amended). The proposed use as a Hot Food Takeaway is excluded from classification by legislation and is 'Sui Generis', 'in a class of its own'. The application proposes opening times of 08:00 to 00:00 every day.

SITE AND LOCATION

This application relates to an existing unit located on a parade of shops on Merrivale Road, within an established residential area of Halewood. The unit is part of a small parade that comprises 5 ground floor retail / commercial units. A row of two-storey residential properties are situated directly above the shops including directly above the application premises. The flats are accessed via external stairs to the side, located on Reigate Close.

Apart from this local parade, the area is predominantly residential in character. There are existing residential dwellings surrounding the application site, including a relatively new residential development to the rear, of which some of the dwellings face onto the rear of the application premises.

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

There is a small lay-by to the front of the application premises and a wide pavement to the front.

Other units in the parade include an empty unit (formerly tanning salon), newsagent, an off-licence and an existing hot food take-away.

POLICY CONSIDERATIONS

PRINCIPLE

The main planning issues relating to this application are the principle of the use, the proposal's impact on highway safety and impact on the residential amenity.

The application site is situated within an area designated on the Local Plan Policies Map as a Primarily Residential Area. Policy H5 states that new development within the primarily residential areas will be permitted provided that the development would not have an unacceptable impact on amenity or adversely affect the character or street scene of the area.

The NPPF requires that the Local Plan defines a network and hierarchy of town, district and local centres, including the role of each centre and the level of development required to meet the needs of their catchment areas. Policy CS6 of the Core Strategy seeks to retain the established retail hierarchy within Knowsley with the aim of ensuring that new development focused in existing centres as opposed to out of centre locations) to assist in the delivery of a mix of uses to complement the retail offer and enhance the vitality and viability of centres.

The application site is located in a 'Minor Parade' as defined at *Appendix B - Detailed Definitions* in the Core Strategy; that is, an existing centre that fails to meet the requirement of the hierarchy of higher order centre in Policy CS6 but remains locally important for local service provision.

Saved Policy S7 states that the Council will grant planning permission for the re use of properties in local shopping centres or parades for hot food takeaways provided that the development accords with Policy S2 and local shopping needs would still be met.

Saved Policy S2 *The Diversification of Uses within existing centres* of the Replacement Unitary Development Plan explains which town centre uses within existing retail centres will be permitted provided specific criteria are met. The glossary in the UDP identifies that for the purposes of this policy a hot food takeaway is a town centre use

The Council's Town Centre Uses SPD is also of relevance and supports saved Policy S2. Although the guidance indicates that is aimed at providing guidance for applications seeking planning permission for, inter alia, hot food take away uses within Knowsley's centres, para. 5.15 states:

- "1. *Planning permission for a hot food takeaway within a town, district or local centre and parade will not be granted if it causes an unacceptable grouping of uses which would have a negative impact on the character of the centre.*
2. *In operating this requirement, the following thresholds should not be exceeded:*
 - a) *More than 10% of units within town centres being hot food takeaways;*
 - b) *More than 20% of units within district centres, local centres and shopping parades being hot food takeaways;*
 - c) *More than two directly adjoining hot food takeaways in a single centre's frontage; and*
 - d) *Less than two non-hot food takeaway units between individual or groups of hot food takeaway units."*

Having regard to the above and that there is an existing hot food takeaway within the parade (20% uptake), with only one unit separating the existing hot food take away and the application site, the proposal would fail to meet criterion b) and d) of the SPD. The proposal would lead to an unacceptable concentration of hot food take aways in this location and is contrary to Policies CS2 and CS19 of the Core Strategy and saved Policies H5, S2, and S7 of the UDP. The application also conflicts with the Town Centre Uses SPD.

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

DESIGN, ACCESS AND CRIME

The application does not propose any external changes to the building as part of the change of use, apart from the external fume extraction plant. The extract system would comprise a flue at ground floor to the rear elevation. It would project approximately 700mm from the rear wall; be approximately 500mm tall at 1.77 m above ground level. No further detail is provided in relation to the materials.

Neighbour objection has been raised in relation to the visual impacts of the equipment. As shown, the plant would be mainly located behind the yard wall, however, it is likely that there would views from first floor windows of properties on Reigate Close. As submitted it is not considered that the unit would cause demonstrable harm to the visual amenity to warrant refusal of planning permission. Nevertheless, for the reasons outlined below in this report, the suitability of the flue for its intended purpose is not considered appropriate and it is likely any suitable flue would give rise to concern over the visual impact.

A number of objections express concern over the upkeep of the existing parade on which the proposed use would be situated. Matters raised include, amongst other things, issues with the maintenance of the building's fabric; rubbish in yards; visual impact of an existing extraction unit and views from properties across the rear of the parade. These matters are existing, the units are privately owned and these issues are not a matter of consideration for the application being determined.

Access

No alterations are proposed to the shop frontage. The proposal does not raise any issues relating to access to the premises.

Crime and Security

Neighbour objection has been received in relation to anti-social behaviour. Such issues can be a material consideration in the determination of planning applications. However, while the late evening opening could result in the congregation of youths around the premises, there is no evidence to suggest that the operation of a hot food take away would result in anti-social behaviour, and therefore this would not be sufficient grounds alone to warrant refusal of this application.

HIGHWAYS

There has also been neighbour objection raising concern over increased traffic and an existing issue with speed of traffic in the locality.

The Local Highway Authority have advised that the parking bays to the front of the unit can often become full resulting in parking taking place on the surrounding pavements and carriageway.

The Local Highway Authority has therefore requested the applicant provides the LPA 'with additional confidence as to the proposal, photographs will need to be taken of the surrounding highway, for a typical weekday evening between 6pm – 7pm (not a Friday). Photographs will also need to be taken for a typical Saturday, again between 6pm – 7pm. These times are typically when hot food takeaways can be expected to be particularly busy. These photographs will be used to assess the current parking levels of the local highway network to determine whether additional vehicles can be accommodated without detriment.'

The existing use falls within Use Class E (d) of the Use Classes Order which incorporates a number of other uses that could be carried out without the need to apply for planning permission to change the use, which include:

- a) retail;
- b) food and drink mostly consumed on premises;

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

- c) (i) financial, (ii) professional services; (iii) appropriate services in a commercial, business or service locality;
- d) indoor sport, recreation or fitness;
- e) medical / health services;
- f) creches / day nursery / day centre;
- g) uses which can be carried out in a residential area without detriment to its amenity: (i) offices, (ii) research and development (products or processes), (iii) industrial processes.

The Council's current parking standards are set out in Appendix A of the *Ensuring a Choice of Travel SPD* (2010). These standards are used by the Council to assess the adequacy of parking provision within any development proposal. For general car parking, the standards define upper limits for new developments. The SPD does not specify the parking provision requirements for a Hot Food Take Away (formerly Use Class A5).

It is noted that in 2001 a similar proposal for the adjacent unit, No. 3, was refused planning permission (Ref: 01/00309/COU), one reason being that: *'The proposed development, in the opinion of the Local Planning Authority, does not comply with Policy T12 of the Unitary Development Plan and would lead to additional traffic and parking that would exacerbate an already difficult location in terms of on-street parking to the detriment of highway safety.'*

However, in this context, and given the change in the Use Classes Order to allow greater flexibility within the Class E, the unit could legitimately be used as any of the above uses without the need for planning permission and this includes uses which, in officer's view, would be likely to generate longer demand from parking. Furthermore, the existing use runs a number of fitness classes and 'boot camps' and as such demand for parking associated with the proposed takeaway would be likely to be less than the existing fitness studio and customers would be likely to park for much shorter periods. The demand, in officer's view, would also not be significantly greater than a shop use.

The Local Highway Authority does not raise any concern in respect of traffic speed.

In relation to highways impact, NPPF para 111 (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Therefore, it is considered that the development would not cause a significant impact on parking to merit the requirement of a parking survey requested by the Local Highway Authority or that the proposal would be significantly detrimental to highway safety to warrant refusal in this instance.

RESIDENTIAL AMENITY CONSIDERATIONS

Policies CS2, CS19 and S2 seek to ensure that proposals for development do not have an unacceptable impact on residential amenity. Policy ENV 2 states that developments which cause unacceptable levels of noise will not be permitted.

Furthermore, the Town Centre Uses SPD states that:

"1. In order to protect residential amenity, the Council will apply the following guidance in considering applications for new hot food takeaways:

- a) Proposals within close proximity to residential premises will only be allowed where there will be no detrimental impact on residential amenity in terms of odour, noise, visual intrusion or general disturbance, for example connected with vibrations, traffic or parking disturbances, litter or hours of operation resulting from the proposed use.*
- b) Applications for hot food takeaways are unlikely to be approved if a party wall is shared with a residential dwelling.*
- c) If there is a residential flat above the premises, planning permission will not be granted unless the operator can demonstrate that the flat will be used in relation to the hot food takeaway."*

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

The proposed use has the potential to cause harm to the residential amenity of neighbouring properties. Concern has been raised within the letters of objection on grounds that the proposal would result in various unacceptable impacts in relation to amenity by way of odours, air quality, noise, disturbance; light pollution and as a result of the impacts associated with increased refuse/litter and vermin.

Odours / Noise

The Council's Environmental Health Officers raised concern in relation to odour and noise from the proposed use and their impact on both the residential properties above and nearby. Neighbour objection includes comment that they currently experience noise from existing refrigeration / extraction units which are quite loud, and the proposed extraction unit would create additional noise.

The application proposes to install an extraction system fan, stated as the *50 MaXfan Compac*. However, there are no details supplied in relation to how smoke / odour control from the hot food takeaway would be controlled. In addition, the application proposes an extraction flue that would duct fumes out from the operations emerging from the rear ground floor and which would point down to the ground which Environmental Health advise is not acceptable. An assessment would be required, in line with EMAQ document titled 'Control of Odour and Noise from Commercial Kitchen Exhaust Systems' to determine the best extraction system for the proposed use as a hot food takeaway. In the absence of precise details, the applicant has not demonstrated that adequate fume extraction and odour filtration from the proposed use can be achieved.

Environmental Health Officers comment that the application does not detail the type of hot food takeaway; however, this application is for a generic hot food take away use and as such, the specifics of any potential operator cannot be taken into account within the determination process and if granted, permission would not be restricted to a particular food type. As such any odour filtration and fume extraction would need to be suitable for all scenarios.

Environmental Health Officers have advised that information is required on the soundproofing measures that are, or would be put in place, to ensure noise from the proposed activity does not impact the residents above. Depending on the floor / ceiling specification, between the shop and the flat directly above, there could be potential for odours to impact the residents.

In that regard, the Town Centre Uses SPD states that:

...b) Applications for hot food takeaways are unlikely to be approved if a party wall is shared with a residential dwelling.

c) If there is a residential flat above the premises, planning permission will not be granted unless the operator can demonstrate that the flat will be used in relation to the hot food takeaway.

The application does not indicate that the flat above would be connected with the proposed use. Nonetheless, odour seepage is likely to accumulate over time through the fabric of the building and more immediately through open windows and doors. Notwithstanding whether there is any connection to the occupation of the flat and the proposed use, controlling the occupation of the flat by planning condition would be both unreasonable and unenforceable, not least because it cannot be assumed that staff occupying the flat would work every hour that the premises is open, considering that the application proposes opening hours of 08:00 to 00:00 every day.

Additionally, regardless of whether an extraction unit is employed, there is also a residual risk that cooking odours could escape from the premises from doors left open, particularly in summer months when there would be a build-up of heat in the unit and residents would have windows open; using their outside balcony; and when the bin stores associated with the development are being used. It is also of note that the oven facilities are located in an open-plan area onto which the main entrance door would open into.

Moreover, Environmental Health Officers have advised that they consider it would be difficult to fix any substantial flue in a manner that would not affect one or other of the neighbouring flats by way of noise and vibration from the extraction system.

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

Whilst planning permission could be granted subject to a condition which requires the submission of precise scheme details, Officers are not persuaded that due to the proximity of the flats and other existing properties, particularly those to the rear, any extraction flue could be sited in a manner that would not affect occupiers of the existing properties from unpleasant odours in their homes; noise and /or vibration disturbance; and impact on visual amenity.

Hours of Operation

Concern has been expressed from a neighbour over the introduction of another late night shop in a small road. The application proposes opening hours of 08:00 to 00:00 every day. The previous use (retrospective change of use from hairdressers (Use Class A1) to form ladies only personal training facility (Use Class D2) Ref: 19/00676/COU refers), proposed hours of 9:00 to 18:00 Monday to Friday. However, it is noted that the permission, as granted, is not conditioned to control the hours of use.

Nevertheless, in terms of disturbance, as the opening hours for the proposed use would be longer than the previous use, the proposal would be likely to result in more coming and goings from the premises over a prolonged period of time and later at night. This would particularly affect residents of the flats above but also nearby dwellings.

The Council's Town Centre Uses SPD indicates that within an area that is primarily residential in character all new hot food takeaway hours of opening will normally be restricted to a closing time of 23:00 Monday to Saturdays, with no opening on Sundays and Bank Holidays. Extended hours will only be permitted where it can be clearly demonstrated that there would be no unacceptable impact on residential amenity. It is recognised that other units such as the existing hot-food take away, off-licence and newsagent may open in the evenings, however, any noise and disturbance already experienced from these existing uses would be exacerbated and extended until midnight if this application were to be approved.

It is acknowledged that hot food takeaways often need to operate later than opening times for retail uses and that evening opening hours are often required to ensure the commercial success of the hot food takeaway business model. However, it is essential that late opening hours do not adversely impact on residential amenity as in comparison to other retail uses, hot food takeaways can generate a higher degree of noise and disturbance, particularly given the recent increase in companies such as 'Deliveroo' and 'Just Eat'. In this instance, the Council's Environmental Health Officer considers that the closing time proposed is not acceptable.

It is concluded that the use is likely to cause unacceptable harm to the living conditions of nearby residential occupiers, through the emissions of odour and noise.

Light Pollution

It has been raised, by a neighbour, that the proposal would result in light pollution. There is no lighting scheme proposed by the application. Given the extended opening hours, the premises may be lit for a longer period of time than the existing use, nevertheless, it is not considered that light omissions from an internal source would result in materially harmful impacts in terms of residential amenity.

Litter

Hot food takeaways can generate increased litter in their immediate vicinity and further afield. In this instance there are two existing litter bins on the parade frontage, with one immediately in front of the application premises which is adequate provision.

Vermin

It has also been expressed that use would attract vermin due to food waste. This is not material planning consideration as it is considered that if the proposed use was to be operated in accordance with good practice this should not be an issue. Whilst appropriate refuse facilities would be required to serve the proposed use, any resulting vermin would be subject to separate control by Environmental Health.

Conclusion on Residential Amenity

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

The application does not demonstrate that the proposal could be carried out without having detrimental impact by way of odours, noise and impact on visual amenity in relation to the fume extraction and odour filtration equipment.

In addition, the proposal would introduce an activity that would generate noise and disturbance outside of the premises from customers comings and goings, both on foot and in vehicles, as well as the possibility of people congregating outside. Having regard to there being an existing hot food take-away and off-licence within this small parade, the increased activity, particularly during the evening would be likely to increase noise levels to a degree that would be harmful to the residential amenity that residents, particularly those of the flats above, could reasonably expect to enjoy.

The proposed development would materially harm the living conditions of existing dwellings and as such would be contrary to Policies CS2 and CS19 of the Core Strategy and Saved Policies H5, S2, S7 and ENV2 of the UDP, which seek to ensure that development avoids unacceptable impacts on residents.

OTHER ISSUES

Waste

Hot food takeaways can generate a significant volume of waste, and disposal of this is a material consideration. Policy WM9 of the Waste Local Plan seeks to ensure that adequate measures are provided for the facilitation of storage and collection of waste and recyclable material. This is echoed in Policy CS26, criterion c) which requires that new developments...facilitate the collection and recycling of waste.

There is an existing issue with this parade with bins being stored on the Street and rubbish accumulating in rear yards. The application site has an external yard area accessed from Reigate Close which would provide space for the storage and facilitation of waste collection. It is acknowledged that whilst a number of objections have been received from local residents this is a management issue for the current users and sits outside of planning controls, this has been reported to the Council's Environmental Health Team to address under separate powers.

The proposed development would be in accordance with Policy WM9 of the Waste Plan and CS26 of the Local Plan.

Grease Trap

In order to prevent sewer blockages and potential flooding, grease associated with the use requires controls to be in place. Should planning permission be granted it is considered that a relevant condition requiring the installation of a suitable grease trap and its use at all times would be appropriate.

CONCLUSION

The proposal would have an adverse impact on the function of a local shopping parade; have a detrimental impact on residential amenity due to noise and disturbance associated with increased activity late in the evening and likely odours and noise and visual impacts of associated equipment. It is therefore considered that the proposal would be contrary to relevant adopted national and local planning policies and is recommended for refusal.

RECOMMENDATION:

1. The proposal would lead to an unacceptable concentration of hot food take aways which would undermine the mix of uses in a locally important parade, which has the primary function of providing local service provision. As such the proposal would be contrary to the National Planning Policy Framework (2021); Policies CS2 and CS19 of the Knowsley Local Plan: Core Strategy, adopted January 2016 and saved Policies H5, S2 and S7 of the Knowsley Replacement Unitary Development Plan, adopted June 2006 and the Town Centre Uses SPD (2016).

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02

2. The proposed use of the premises as a hot food takeaway by reason of the odours, noise and disturbance likely to be created by the proposed operations and activity generated, particularly during the late evening, would be unduly detrimental to the amenities of the occupiers of nearby dwellings, and particularly the first floor flats above the premises. As such the proposal would be contrary to the National Planning Policy Framework (2021); Policies CS2 and CS19 of the Knowsley Local Plan: Core Strategy, adopted January 2016; and Saved Policies H5, S2, S7 and ENV2 of the Knowsley Replacement Unitary Development Plan, adopted June 2006 and the Town Centre Uses SPD (2016).
3. The application fails to demonstrate that a suitable external flue, which would adequately address fume extraction without resulting in an unduly intrusive feature to the detriment of visual amenity would be achieved. As such the proposal would be contrary to the National Planning Policy Framework (2021); Policies CS2 and CS19 of the Knowsley Local Plan: Core Strategy, adopted January 2016 and saved Policies H5, S2 and S7 of the Knowsley Replacement Unitary Development Plan, adopted June 2006 and the Town Centre Uses SPD (2016).

Maxine Wishart
7 June 2022

Alan Kilroe
14 June 2022

Document Reference	Document Issue Number	Document Issue Date
PS/DC/OP04/05	003	23/9/02