

## COPELAND BOROUGH COUNCIL DELEGATED PLANNING DECISION

1.	<b>Reference No:</b>	4/22/2335/OF1
2.	<b>Proposed Development:</b>	EXTENSION TO BATTERY STORAGE FACILITY
3.	<b>Location:</b>	LAND AT WOODEND, CLEATOR
4.	<b>Parish:</b>	Egremont
5.	<b>Constraints:</b>	ASC;Adverts - ASC;Adverts, Coal - Standing Advice - Data Subject To Change, Key Species - Potential Area for Great Crested Newts, Outer Consultation Zone - Sellafield 10KM
6.	<b>Publicity Representations &amp;Policy</b>	See Report
7.	<b>Report:</b>  <b>Site and Location</b>  <p>The site adjoins the existing Battery Storage Facility at Woodend and extends to some 0.6ha in area. Elevated in form it is bounded by Woodend Road to the south and the residential properties that face onto the road opposite. These include Grade II listed Croft End House which is a prominent property which faces out across the site. To the north, the site neighbours the existing electricity substation and agricultural land. To the east it borders the vehicle access to the substation and to the west an existing commercial / residential premises, formerly Kenmare`s timber yard.</p> <p>The site itself currently forms part of existing landscaped bund/ area surrounding the facility and agricultural land.</p> <b>Proposal</b>  <p>This application seeks planning permission for an extension to the existing battery storage facility at Woodend, Cleator.</p> <p>The proposal is to extend the existing site to the south and west (L shape extension) which would involve considerable earthworks in order to increase the size of the existing level platform the units</p>	

sit upon.

This extension will involve the following:

- Removal of the existing earth bund along southern edge and replace with a similar bund profile of the same height further to the south.
- Existing bund to the west would be re-profiled retaining the same height but with steeper sides. Detailed design of both bunds to be provided.
- New landscaping on and around the bunds comprising native woodland planting and wildflower grassland.
- Erection of a new fence line around the extended perimeter to incorporate the new extension. Fence to be either palisade or close boarded acoustic type and a maximum of 3m in height.

Plant and Equipment:

- Installation of three larger modular battery units adjacent to the existing, each unit measuring 3.3m in width 17m in length and 2.4m in height sitting on a 0.5m concrete plinth with a white or grey finish.
- Siting of 3 power conversion systems (pcs) and transformers, each 2.4m in width by 8.1m in length and 2.4m in height set on a 0.5m high concrete plinth.
- 1 new Control Room, measuring 5m in length by 2.4m wide, 2.8m high on 0.9m stilts maximum height of 3.7m.
- 1 new Emergency Diesel Generator (EDG) 5.3m in length by 1.61m in width, 2.86 in height on a 0.5 m depth of concrete foundation.
- 1 new Aux Transformer, maximum of 2.1 m high by 2.5m in width and 3.0m in length on a 0.5m depth of concrete foundation.
- Grid Compliance Equipment (GCE) with a footprint of 3.0m by 4.8m, 3m in height on a 1m concrete foundation.
- Proposed lighting/CCTV column – 2 proposed to replace existing further south. Each 4m high on a single galvanised pole.
- Firewall – maximum height of 3.9m and 0.450m thick with a length up to 10m on a concrete foundation.

Details of all the proposed plant and equipment including the battery units, control room, lighting/CCTV columns and firewall are to be conditioned.

### **Background and Purpose of facility**

Battery Storage Systems are a relatively new element to the management of the National Grid and provide local reinforcement to the Grid. They can store surplus energy and release it in peak demand periods. The original application for the battery facility formed part of the roll out of a national scheme, providing enhanced frequency response services to the Grid and was one of the first of such projects.

Energy storage facilities are a key component of a low carbon and decentralized energy system. Battery storage provides a capability to store electrical energy for use when peak energy needs are required. This helps balance out the supply and demand differentials in the national grid as a whole and in the local network as a result of local energy production and consumption.

This application to extend and intensify the facility would allow increased battery storage capacity time on the site from half an hour to two hours.

### **Relevant Planning History**

Planning permission for the existing battery storage facility (ref. 4/16/2263/0F1) was granted in October 2016. The facility was then subject to a non-material amendment to alter the site layout (ref. 4/16/2263/0F1) which was subsequently approved in February 2017. All relevant conditions were then discharged in March 2017.

### **Consultation Responses**

#### Egremont Town Council

No objection

#### Coal Authority

No objection. As there are no coal mining legacy issues recorded on the site the Coal Authority has no objection to the proposal. However, potential risks posed to the development by the recorded Ironstone mine entry and its zone of influence should be considered by the LPA as part of the general planning decision making process.

#### Natural England (NE)

No objection. Based on the plans submitted, NE considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites, European Protected sites or landscapes.

#### Arborist

No objection

A landscaping plan accompanies the proposal which includes a significant number of trees to be planted on the embankment to screen the proposed development.

No significant trees are currently growing on the site. Recommends a condition be included requiring the submitted landscaping plan to be implemented in full in the first growing season following construction of the development. Any trees or shrubs dying within five years of planting to be replanted with similar species. The management and maintenance of this new planting over the lifetime of the development could be subject to a suitably worded planning condition.

CCC Local Highway Authority

No objection

As there will be no change to vehicle parking requirements following the proposed extension to the battery storage facility it is unlikely to have an effect on the existing highway network.

CCC Lead Local Flood Authority

No objection

Informed the site will connect its impermeable land to the existing drainage systems approved in the previous applications.

ONR

No comment as it does not meet the ONR criteria

CCC Resilience

No objection

Environmental Health

Following liaison with the applicant's acoustic consultant it is considered that predicted noise levels for the development would not present a noise problem to residents.

The only other consideration would be external lighting and request a planning condition covering this.

Flood and Coastal Defence Engineer

Objects on the grounds that there is a lack of detailed information regarding the proposed soakaway

surface water drainage system for the site.

Conservation Officer

No objection, is of the opinion that the proposal will entail less-than-substantial harm, towards the negligible end of the scale, to the setting of the nearby listed building.

**Public Representations**

The application has been advertised by way of a site notice and neighbour notification letters and no representations have been received.

**Planning Policy**

Planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

**Adopted Copeland Local Plan 2013-28 (ACLP)**

The Core Strategy and Development Management Policies DPD forms the basis of the Copeland Local Plan. The policies relevant to the determination of this application are:

- ST1 – Strategic Development Principles
- ST2 – Spatial Development Strategy
- ST4 – Providing Infrastructure
- ER2 - Planning for the Renewable Energy Sector
- ER3 - Support Infrastructure for the Energy Coast
- ENV4 - Heritage Assets
- ENV1 – Flood Risk and Risk Management
- ENV3 – Biodiversity and Geodiversity
- ENV4 – Heritage Assets
- ENV5 - Protecting and Enhancing the Borough's Landscape
- DM26 - Landscaping
- DM10 - Achieving Quality of Place
- DM25 - Protecting Nature Conservation Sites, Habitats and Species
- DM27 - Built Heritage and Archaeology.

### **Emerging Copeland Local Plan 2017 -2038 (ECLP)**

- Policy DS1PU – Presumption in Favour of Sustainable Development
- Policy DS6PU – Design and Development Standards
- Policy DS7PU – Hard and Soft Landscaping
- Policy DS10PU – Soils, Contamination and Land Stability
- Policy N3PU – Biodiversity Net Gain
- Policy N5PU – Protection of Water Resources
- Policy N6PU – Landscape Protection
- Policy BE1PU – Heritage Assets
- Policy BE2PU – Designated Heritage Assets
- Policy BE4PU – Non-Designated Heritage Assets

The emerging Copeland Local Plan 2017-2038 comprising the Publication Draft (January 2022) and Addendum (July 2022) have recently been submitted for examination by the Planning Inspector.

As set out at Paragraph 48 of the National Planning Policy Framework (NPPF), Local Planning Authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan; the extent to which objections to relevant policies have been resolved; and the degree to which emerging policies are consistent with the NPPF. Given the stage of preparation of the emerging Copeland Local Plan 2017-2038 some weight can be attached to policies where no objections have been received or objections have been resolved.

The Publication Draft (January 2022) and Addendum (July 2022) provides an indication of the direction of travel of the emerging planning policies, which themselves have been developed in accordance with the provisions of the NPPF.

### **Other Material Planning Considerations**

National Planning Policy Framework (NPPF).

Planning Practice Guidance (PPG).

The Planning (Listed Buildings and Conservation Areas) Act 1990

National Design Guide (NDG).

The Conservation of Habitats and Species Regulations 2017 (CHSR).

Cumbria Development Design Guide (CDDG).

## **Assessment**

### Principle of Development

The principle of development for energy storage on the site has been established by the original permission for the development of an electricity storage facility ref. 4/16/2263/0F1. This application seeks to extend that facility within the original application site and is considered generally compliant with the policies of the ACLP and the ECLP.

### Conservation / Heritage Impacts

The impact of the proposal on the setting of the grade II listed building opposite will need to be carefully assessed. A Heritage Statement has been included within Planning Statement and submitted as part of the application. The Conservation Officer is of the opinion that the site is already within the plot of the existing battery storage facility, and although the proposals require an extension nearer the road, which will necessitate reducing the thickness of the bund that acts as screening, it will entail less-than-substantial harm, towards the negligible end of the scale, to the setting of the nearby listed building (Croft End House, area walls, gate piers and railings).

He considers that the retention of the bund to the same height, coupled with its slight wrapping around the corner of the extension at the entrance to the SE corner of the site, and the proposed woodland buffer planting mix, will mitigate harm levels close to zero. Given the benefit of increasing the battery storage capacity, he is of the view that this mitigated harm is acceptable.

It is acknowledged that there will be greater less-than-substantial harm temporarily during the construction works and the establishment of the vegetation, but once this has taken place and matured it may be more successful for screening the development than is currently the case. In this regard the proposal is considered to satisfactorily comply with policies ST1, ENV4, DM10 and DM27 of the ADCLP and the equivalent policies of the ECLP.

### Landscape and Visual Impacts

There are potential landscape and visual amenity impacts likely to arise given the proximity to neighbouring residential properties opposite and the prominence of this semi-rural site. Substantial mitigation is therefore proposed. A Landscape and Visual Assessment (LVA) to help assess the potential impact of the proposed battery extension on local, wider views and landscape character accompanies the application along with an enhanced landscaping and maintenance scheme. A Detailed Planting Plan also forms part of the application.

Alike the existing facility the proposed new plant and equipment will be set down into the existing landform. To achieve this, significant earthworks will need to be undertaken to extend the existing level platform the existing plant sits upon. This will also involve re-modelling and extending the existing landscape bunds around the edge of the site to the south and west. Once complete it is envisaged that there will be limited views of the equipment. Full details of the re-modelling/ re-design of the bunds can be controlled by condition.

To help assimilate the development into the wider landscape and mitigate the earthworks and subsequent retaining structures, the application proposes a significant area of proposed planting. The

Landscape and Visual Impact Assessment (LVIA) demonstrates that the proposal would not have any significant adverse impacts when the proposed landscaping is carried out. It is considered therefore that in this respect the proposal is acceptable and compliant with both national and local policy.

Conditions have been appended which secure the submission of further details and ensure the carrying out and maintenance of landscaping.

However, there would be inevitable landscape and visual effects during construction, as a result of the proposed battery storage facility extension, (to create the new bund and alter the existing) in particular to adjacent residents and those using nearby roads. However, these adverse landscape and visual effects would be temporary and short-term.

Once the proposed battery storage facility extension has been completed, the landscape and visual effects would be similar to that which already exists, therefore, no additional

effects are predicted over and above that set out for the existing storage facility. In the

longer-term, with the proposed mitigation planting establishing, there would be the potential for beneficial landscape and visual effects.

#### Surface Water Drainage

Flood and Coastal Defence Engineer objects to the proposed extension on the grounds that there is a lack of detailed information regarding the proposed soakaway surface water drainage system for the site. It is considered that this could be adequately addressed by a pre-commencement condition requiring the approval and implementation of a surface water drainage scheme as it would be unreasonable to refuse the application on such grounds. It should be noted that the LLFA raise no objection.

#### Noise

This is a key issue and there is potential for noise emanating from the development given the proximity to residences and the prominent and open nature of the site, to affect neighbours and the amenity of the area generally, particularly the cumulative impact when taking into account the emissions from the existing adjoining facility. The Environmental Health Officer considers noise disturbance at night to residents would be the issue of greatest concern.

An acoustic report accompanies the application and despite initial reservations, our Environmental Health Officer, following liaison with the acoustic consultant, now considers that the predicted noise levels for the development would not present a noise problem to nearby residents. If it transpires there were to be a noise complaint, the statutory nuisance provisions of s79 Environmental Protection Act 1990 would give the Council powers to investigate accordingly.

#### Lighting

As there may be potential for light spill beyond the curtilage of the development and for this to affect neighbouring residents and general amenity, as raised by the Environmental Health Officer, there will be a condition covering the details of this.

#### Ecological Impacts



The application is accompanied by a Preliminary Ecological Assessment which identifies that the site is within proximity of some sites of ecological importance. In particular there are three Special Areas of Conservation (SAC) and one Special Protection Areas (SPA) within 15km of the site boundary. And within 5km there are five Sites of Special Scientific Interest (SSSI). There are also two non-statutory designated sites within 2km of the application site. They are both County Wildlife Sites (CWS) within 600m of the proposed development.

It is acknowledged there is hydrological connectivity via groundwater flow between the site and the designated sites; River Ehen SAC, River Ehen SSSI, Clint's Quarry SSSI, Longlands Lake CWS, and Ehen Ponds CWS. As regards pollution it is noted that measures have been included within the development design to prevent dust and other pollution entering the watercourse. Any standard pollution prevention measures will be secured through a suitably worded planning condition requesting a Construction Environmental Management Plan ("CEMP").

As a result of the development design and the implementation of the above measures, it is considered there will be no likely significant effect upon the designated sites.

In addition, a total of nine habitat types were noted during the UK Habitat survey undertaken on the 16th of May 2022 and were assessed for their potential to support protected and notable species present within the local area.

Although the site has a potentially sensitive ecological setting. It is identified as of interest to Great Crested Newts and is within proximity of the River Ehen SAC and SSSI and other sites of ecological interest.

The application is accompanied by A Net Gain Assessment Report, this concludes that there would be a 28.53% gain in area habitat units. This should be considered an excellent level of compensation for the loss of mostly poor condition neutral grassland which is well in excess of 10% requirement of the proposed Environment Act, showing that the Proposed Development is expected to lead to significant biodiversity net gain and as such accords with policies N1PU and N3PU of the ECLP.

Based on the plans and details submitted, NE considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites, SSSI's or landscapes. As regards European protected sites NE considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, they advise the decision be recorded that a likely significant effect can be ruled out.

#### Wider Benefits

In addition, there are substantial public benefits arising from the scheme such as the sustainable storage of energy that weighs heavily in favour of the scheme. Local Plan Policy ER2 supports such new energy proposals which best maximise resources and minimise environmental and amenity impacts.

#### Planning Balance and Conclusions

The use and choice of site is considered appropriate due to its relationship with the immediately

	<p>adjacent substation</p> <p>As regards ecology the Preliminary Ecological Survey and the BNG Report accompanying the application affirm that any potential ecological impacts arising from the proposed development can be adequately mitigated and biodiversity net gain enhancement would exceed that normally required.</p> <p>The wider benefits of the proposal outweigh any adverse impacts.</p>
8.	<p><b>Recommendation:</b></p> <p>Approve (commence within 3 years)</p>
9.	<p><b>Conditions:</b></p> <ol style="list-style-type: none"> <li> <p>The development hereby permitted shall be commenced before the expiration of three years from the date of this permission.</p> <p>Reason</p> <p>To comply with Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.</p> </li> <li> <p>Permission shall relate to the following plans and documents as received on the respective dates and development shall be carried out in accordance with them: -</p> <p><u>Documents</u></p> <p>Covering Letter by Naomi Warrenberg, Planner, Pegasus Group, ref. P22-0882.L001v1-NW, dated 2 August 2022</p> <p>Planning, Heritage and Design and Access Statement – Pegasus Group, ref. P22-0882. dated August 2022,</p> <p>Landscape and Visual Note – Pegasus Group, ref. P22-0882.EN.001A, dated 27.07.2022.</p> <p>Acoustic Impact Assessment – RES, ref. 04989-3775755, dated 20 June 2022.</p> <p>Preliminary Ecological Appraisal - Neo-Environmental, dated 18.07.2022.</p> <p>Biodiversity Net Gain Metric Assessment Report– Neo-Environmental. Dated 2.08.2022.</p> <p><u>Plans</u></p> <p>Location Plan, drwg no. 04989-RES-MAP- DR-XX-101 Rev 1, scales 1:750 &amp; 1:2,000</p> <p>Infrastructure Layout ref. 04989-RES-PRO-DR-PT-101 Rev. 3, scale 1:500.</p> <p>Battery Enclosure ref. 04989-RES-BAT-DR-PT-101 Rev. 1, scale 1:100.</p> </li> </ol>

Power Conversion System & Transformer ref. 04989-RES-PCS-DR-PT-101 Rev. 1, scale 1:75  
Fire Wall ref. 04989-RES-SDP-DR-PT-101 Rev. 1, scale 1:50.

Typical Security Fence Details ref. 04989-RES-SEC-DR-PT-101 Rev. 2, scale 1:35

Typical Acoustic Fence Detail ref. 04989-RES-SEC-DR-PT-102 Rev. 1, scale 1:50

Typical Lighting & CCTV Column ref. 04989-RES-SEC-DR-PT-103 Rev. 1, scale 1:25

Control Enclosure ref. 04989-RES-SUB-DR-PT-101 Rev. 2, scale 1:75.

Auxiliary Transformer ref. 04989-RES-SUB-DR-PT-102 Rev. 1, scale 1:50.

Grid Compliance Equipment ref. 04989-RES-SUB-DR-PT-103 Rev. 1, scale 1:50.

Emergency Diesel Generator ref. 04989-RES-SUB-DR-PT-104 Rev. 1, scale 1:50

Detailed Planting Plan ref. P22-0882\_EN\_001\_\_Sht-1, scale 1:250, dated 25.07.2022

Reason

To conform with the requirement of Section 91 of the Town and Country Planning Act 1990, as amended by the Planning and Compulsory Purchase Act 2004.

#### Pre-commencement – Drainage

3. Before development commences full details of the proposed surface water drainage system, including any attenuation measures, shall be submitted to and approved by the Local Planning Authority in writing. The drainage system shall be implemented as approved, be fully operational before the development is brought into use and be so maintained thereafter for the lifetime of the development.

Reason

To ensure a satisfactory scheme of surface water disposal from the site.

#### Pre-commencement - Bund Design

4. Before development commences full details of the design of the landscape bund shall be submitted to and approved in writing by the Local Planning Authority. The landscape bund shall be constructed as approved and maintained as such for the lifetime of the development.

Reason

To retain control over the design of the bund in the interests of landscape and visual amenity.

Pre-commencement – CEMP

5. No development shall commence, until a Construction Environmental Management Plan (CEMP) *detailing proposed pollution control measures, transport routes, signage, working hours, wheel cleaning facilities, and site compound location* etc. shall be submitted to and approved in writing by the local planning authority. The CEMP shall be implemented as approved.

Reason

In order to ensure the implementation of adequate pollution control measures during construction of the development in the interests of environmental amenity.

External Materials

6. Before any plant and machinery is installed on the site or firewall constructed full details of the external materials and finishes to be used on them shall be submitted to and approved by the Local Planning Authority in writing. The plant and machinery and firewall shall be installed or constructed as approved and maintained as such for the lifetime of the development.

Reason

To retain control over the design of the plant and equipment and firewall in the interests of visual amenity.

Fencing

7. Before any new fencing is erected on site full details of the design, external materials and finish to be used shall be submitted to and approved in writing by the Local Planning Authority. The fence shall be erected as approved and maintained as such for the lifetime of the development.

Reason

To retain control over the design of the new fence in the interests of visual amenity.

Landscaping

8. The landscaping details as approved in the Detailed Planting Plan ref. P22-0882\_EN\_001\_\_Sht-1, scale 1:250, dated 25.07.2022 shall be implemented in full in the first growing season following completion of the groundworks of the development.

Reason

In order to ensure the implementation of a satisfactory landscaping scheme

9. Should any plants be found to be dead, diseased or dying within 5 years following completion of the planting scheme, these shall be replanted with a similar species within the first available planting scheme.

Reason

In order to ensure that the planting scheme becomes appropriately established.

CCTV

10. Prior to installation, full details including siting, make, model and colour of the CCTV system to be installed shall be submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details and retained as such at all times thereafter.

Reason

In order to ensure that the impacts of the cameras are acceptable given the open countryside nature of the site.

Restoration

11. Should the installation not be required or unused for a period of 12 months, the plant, machinery and associated structures shall be removed from the site and the land reinstated in accordance with a scheme of restoration to be agreed in writing with the Local Planning Authority before any such work is undertaken.

Reason

In order to ensure that the land is satisfactorily restored should the installation no longer be required.

Hours of Working

13. The hours of working on site during the construction of the development and any lorry or

heavy transport movements to or from the site associated with the development shall be limited to 0800 to 1800 hours on Mondays to Fridays and 0800 to 1400 hours on Saturdays. No work shall take place outside these days and hours unless agreed in writing by the Local Planning Authority.

#### Reason

In order to protect the amenities of the locality and the occupiers of any nearby properties

#### **Informatives**

##### Coal Standing Advice

The proposed development lies within a coal mining area which may contain unrecorded coal mining related hazards. If any coal mining feature is encountered during development, this should be reported immediately to The Coal Authority on 0845 762 6848. It should also be noted that this site may lie in an area where a current licence exists for underground coal mining.

Further information is also available on The Coal Authority website at [www.coal.decc.gov.uk](http://www.coal.decc.gov.uk)  
Property specific summary information on past, current and future coal mining activity can be obtained from The Coal Authority's Property Search Service on 0845 762 6848 or at [www.groundstability.com](http://www.groundstability.com) <<http://www.groundstability.com>>

##### Electricity NW

The development is shown to be adjacent to or affect Electricity North West's operational land or electricity distribution assets.

Where the development is adjacent to operational land the developer must ensure that the development does not encroach over either the land or any ancillary rights of access or cable easements. If planning permission is granted the applicant should verify such details by contacting Electricity North West, Land Rights & Consents, Frederick Road, Salford, Manchester M6 6QH. Great care should be taken at all times to protect both the electrical apparatus and any personnel working in its vicinity.

The developer is referred to two relevant documents produced by the Health and Safety Executive, which are available from The Stationery Office Publications Centre and The Stationery Office Bookshops, and advised to follow the guidance given.

The documents are as follows:-

HS(G)47 – Avoiding danger from underground services.

GS6 – Avoidance of danger from overhead electric lines.

Should there be a requirement to divert the apparatus because of the proposed works, the cost of

such a diversion would usually be borne by the developer. They should be aware of Electricity North West requirements for access to inspect, maintain, adjust, repair, or alter any of our distribution equipment. This includes carrying out works incidental to any of these purposes and could require works at any time of day or night. The Electricity Services Desk (Tel No. 0800 195 4141) will advise on any issues regarding diversions or modifications.

Electricity North West offers a fully supported mapping service, at a modest cost, for their electricity assets. This is a service which is constantly updated by their Data Management Team who can be contacted by telephone on 0800 195 4141 or access the website <http://www.enwl.co.uk/our-services/know-before-you-dig>

Early consideration in project design to the above is recommended as it is better value than traditional methods of data gathering. It is, however, the developer's responsibility to demonstrate the exact relationship on site between any assets that may cross the site and any proposed development.

#### Artificial Lighting (external)

Artificial lighting to the development shall conform to requirements of the Obtrusive Light Limitations for Exterior Lighting Installations for Environmental Zone E2 within the Institute of Light Engineers Guidance Notes For the Reduction of Obtrusive Lighting GN01 dated 2005.

#### **Statement**

The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received, and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development as set out in the National Planning Policy Framework.

**Case Officer: H.S. Morrison**

**Date : 15.12.2022**

**Authorising Officer: N.J. Hayhurst**

**Date : 15.12.2022**

**Dedicated responses to:- N/A**