# **Report of the Corporate Director of Planning & Community Services**

Address BUILDERS YARD JOEL STREET NORTHWOOD

**Development:** Erection of a single-storey building for storage, offices, staffroom/toilets and customer service area plus general store (Involving demolition of all existing buildings on site including the Voda Phone plant and mast).

**LBH Ref Nos:** 16194/APP/2009/580

Drawing Nos: 1728/PL/01 Revision A 1728/PL/02 1728/PL/03 Design and Access Statement: Revision A

Date Plans Received:	19/03/2009	Date(s) of Amendment(s):	24/03/2009
Date Application Valid:	19/03/2009		27/04/2009

# 1. SUMMARY

The proposal is considered to be detrimental to the open character of the Green Belt and visual amenities of the street scene contrary to Policy OL4 of the Hillingdon Unitary Development Plan Saved Policies (September 2007). The application is recommended for refusal.

# 2. **RECOMMENDATION**

# **REFUSAL** for the following reasons:

# 1 NON2 Non Standard reason for refusal

The proposal represents inappropriate development within the Green Belt for which no case of very special circumstances has been made by the applicant to justify its approval. The proposal is therefore contrary to Policy OL1 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and Planning Policy Guidance 2 (PPG2) - Green Belts.

# 2 NON2 Non Standard reason for refusal

The proposed building by reason of its height, scale, bulk, design, discordant and unsympathetic materials and prominent location, would result in a disproportionate change to the bulk and character of the original building(s), which would be visually intrusive and detrimental to the open character and purpose of the Green Belt. The proposal is therefore contrary to Policy OL4 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and Planning Policy Guidance 2 (PPG2) - Green Belts.

# 3 NON2 Non Standard reason for refusal

No visual or landscape impact analysis has been submitted and no landscape proposals made to mitigate the impact of the proposal on its surroundings. The proposal therefore fails to enhance the landscape quality of the site, and as such is detrimental to the

character of the Green Belt contrary to Policies OL2 and BE38 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and Planning Policy Guidance 2 (PPG2) - Green Belts.

# 4 NON2 Non Standard reason for refusal

The proposed development would result in an increase in scale and site coverage of structures and buildings, and as a result fails to indicate the provision of off-street parking or manoeuvring areas for large vehicles, staff and customers. The proposal would therefore be detrimental to highway and pedestrian safety and the free flow of traffic on the public highway, and as such is contrary to Policies AM2 and AM14 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and the Council's Car Parking Standards (September 2007).

# **INFORMATIVES**

# 1 I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

# 2 153 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (February 2008) and national guidance.

OL2 OL4	Green Belt -landscaping improvements Green Belt - replacement or extension of buildings
BE13	New development must harmonise with the existing street scene.
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
PPG2	Green Belts

# 3. CONSIDERATIONS

# 3.1 Site and Locality

The application site is located on the east side of Joel Street opposite its junction with Norwich Road and comprises a builder's merchants yard. The site is approximately 0.13 hectares and is surrounded to the north, east and south by open fields. To the west and on the opposite side of Joel Street are 150 and 154 Joel Street, a surgery and dwelling house, respectively. The application site lies within the Green Belt as identified in the adopted Hillingdon Unitary Development Plan (Saved Policies September 2007).

### 3.2 **Proposed Scheme**

Planning permission is sought for the erection of a single-storey building for storage, offices, staffroom/toilets and customer service area plus general store involving the demolition of all existing buildings on site including the Vodafone plant and mast.

The proposed building would be sited on the northeast end of the site some 24m from the road frontage (same as the previously refused scheme and within 1.3m of the rear boundary). It would be sited 1.5m and 9.5m from the northern and southern boundaries respectively. The proposed building would measure 26m long (similar to the previous proposal), 13m wide (3.2m wider than the previous scheme) with a total height of 7.5m (700mm lower than the previously refused scheme). It would have an eaves height of 3.5m.

The applicant has described the proposed building as "practically a single-storey structure with pitched roof to the side of the building at 22° and a central lantern roof offering light into the storage area." The building is to be constructed in brick up to a metre high, with an internal steel frame and roof truss. The remaining wall will be covered in timber boarding and the roof with a module artificial slate roof covering in white stone chippings.

#### 3.3 Relevant Planning History

# Comment on Relevant Planning History

Planning permission ref: 16194/APP/2008/1279 for the erection of a two-storey building for storage, offices, staffroom/toilets and customer service area, erection of 2.5m high metal railings to side/rear of site and retention of 4m high freestanding metal racking system involving the demolition of all existing buildings on site was refused in October 2008 for the following reasons:

1. The proposal represents inappropriate development within the Green Belt for which no case has been made by the applicant to justify its approval. The proposal is not therefore of very special circumstances and is contrary to Policy OL1 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and Planning Policy Guidance 2 (PPG2).

2. The proposed building by reason of its height, scale, bulk, design, discordant and unsympathetic materials and prominent location, would result in a disproportionate change to the bulk and character of the original building(s), which would be visually intrusive and detrimental to the open character and purpose of the Green Belt. The proposal is therefore contrary to Policy OL4 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and PPG2.

3. The existing racking structure by reason of its height, scale and design represents a

visually intrusive form of development detrimental to the visual amenities of the locality, and as such runs contrary to the aims and objectives of national and local planning policy, which seeks to keep the Green Belt in an open and attractive state. The proposal is therefore contrary to Policies BE13, BE19 and OL4 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and PPG2.

4. No visual or landscape impact analysis has been submitted and no landscape proposals made to mitigate the impact of the proposal on its surroundings. The proposal therefore fails to enhance the landscape quality of the site, and as such detrimental to the character of the Green Belt contrary to Policies OL2 and BE38 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and PPG2.

5. The proposed development would result in an increase in scale and site coverage of structures and buildings, and as a result fails to indicate the provision of off-street parking or manoeuvring areas for large vehicles and staff. The proposal would therefore be detrimental to highway and pedestrian safety and the free flow of traffic on the public highway, and as such is contrary to Policies AM2 and AM14 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and the Council's Car Parking Standards (September 2007).

# 4. Planning Policies and Standards

# UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

Part	2	Policies:
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OL2	Green Belt -landscaping improvements
OL4	Green Belt - replacement or extension of buildings
BE13	New development must harmonise with the existing street scene.
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
PPG2	Green Belts

5. Advertisement and Site Notice

Not applicable

- 5.1 Advertisement Expiry Date:-
- 5.2 Site Notice Expiry Date:- Not applicable

# 6. Consultations

## **External Consultees**

47 neighbouring occupiers have been consulted. 8 letters of objection have been received with the following comments:

(i) The proposal will lead to further congestion of Joel Street due to the location of the access to the site, especially at peak traffic times, and as a result of delivery vehicles of up to 40 foot long holding up traffic;

(ii) Where will the staff park, as there is no on-site parking? Delivery vehicles wait outside the houses in Joel Street (usually between Nos. 158 to 166) awaiting access to the yard. This usually conflicts with early morning traffic in this area and those of Haydon and Herlyn schools nearby;

(iii) The proposal would be detrimental to the outlook onto the site;

(iv) The existing external storage racks which have been erected without prior planning permission is industrial, an eyesore, out of keeping with the surrounding. Prior to Grant and Stone taking over this builder's yard, the building materials stored in the yard were seldom visible over the green hedge that surrounds the yard on the right hand side. Any external storage rack should be lower so as to create less of a visual impact;

(v) Some additional perimeter lighting had been erected without planning permission. The lights light up the whole site when they are on and are very obtrusive. Is planning permission required?

(vi) Various storage units have appeared without planning permission;

(vii) The building and its construction materials are not in keeping with existing buildings in the area and not appropriate in a Green Belt environment. It is the type of building found on an industrial estate. The converted barn across the field from the builder's yard is more in keeping with a structure expected to find next to Green Belt land;

(viii) Whilst the present structure on the site is far from attractive it is at least unobtrusive. The rather rustic character of the shed is, in some ways, in sympathy with the more rural surroundings;

(ix) The proposed building is too large for a development in the Green Belt;

(x) The proposal, if allowed, will intensify the use of the site which has been low-key all this while;

(xi) Concerned about the overloading of the drainage system in this area as there has been problems on several occasions when the main sewer at the junction of Joel Street and Norwich Road flooded the smallholding adjacent the application site.

Northwood Hills Residents' Association - No comments received

Ickenham Residents' Association - No comments received

Ward Councillor - requests that the application be reported to Committee for determination.

# **Internal Consultees**

HIGHWAYS ENGINEER:

Although no comments have been received, the current application is similar in concept and particularly its siting, to the previously refused scheme, and as such, the comments of the Highways Engineer for that proposal are relevant to this application. The comments are as follows:

This application cannot be supported on Transportation grounds. The proposed plans do not indicate

the provision of off-street parking or manoeuvring area for large vehicles. As the use of lorries for the site causes traffic issues in Joel Street, the size of the building is more than doubling and the installation of the racking system, it is not known what the remaining area for parking and manoeuvring is. The applicant's application also indicates that staff at the site will increase. As such, the proposal is contrary to Policies AM2 and AM14 of the UDP.

The Transportation Section therefore objects to the proposal given the above.

### TREES AND LANDSCAPE:

### THE SITE

The site is currently occupied by a builder's merchant, located on designated Green Belt land to the east of Joel Street, overlooked by housing to the west of Joel Street. The Green Belt here is mainly a patchwork of fields and hedgerows, which slope eastwards down to a valley before rising again to the east. The builder's merchant is well screened from the north by a block of woodland, but the yard with storage and a single-storey building is otherwise out of character with the rural appearance of the open space when viewed from the west and south of Joel Street - and other vantage points.

The application form (section 16) refers to the proximity of trees but provides no survey detail. Existing hedges are indicated on drawing No 2 on the east, west and southern boundaries.

### THE PROPOSAL

The proposal is for the development of a new accommodation and storage building for the current site use as a builders' merchant. The proposed building will replace a collection of olde structures. The Design & Access Statement confirms that there will be little landscap enhancement associated with this proposal. The drawings indicate that the existing boundary hedge will do little to screen or mitigate the visual impact of the proposed building on the Green Belt.

#### RECOMMENDATION

I object to this proposal, which has a detrimental impact on the character of the Green Belt in accordance with policies OL1 and OL2 and fails to enhance the landscape quality of the site in accordance with policy BE38.

POLICY AND ENVIRONMENTAL PLANNING:

The site is a non conforming use in the Green Belt. To comply with Saved Policy OL4 officers will need to be satisfied that the proposal does not result in any disproportionate change in the bulk and character of the original buildings, does not significantly increase the built up appearance of the site or injure the visual amenities of the Green Belt by reason of siting, materials, design, traffic or activities generated.

#### ENVIRONMENTAL PROTECTION UNIT:

EPU does not have any history of noise or nuisance complaints from these premises.

#### WASTE MANAGEMENT:

Because the application is for a commercial development, the business that occupies these premises ultimately has discretion over the waste management methods they intend to use. However, as a minimum planning approval should require that the redevelopment of the site includes room to locate recycling facilities for all grades of paper and cardboard, cans, plastic bottles, and also glass bottles and jars.

To this end any refuse and recycling bins provided as part of this development must be housed in chambers constructed according to the following specification:-

Good vehicle access and egress to ensure the facilities can be easily serviced and are no more than 10 metres from the closest point of access for a refuse collection vehicle. Vehicle access to the site should not be obstructed by overhanging trees/vegetation. In addition measures should be taken to prevent the inconsiderate parking of vehicles which could block access to the bin chamber(s).

# 7. MAIN PLANNING ISSUES

# 7.01 The principle of the development

The site is a non conforming use in the Green Belt and thus for a building to be acceptable on the site the applicant needs to demonstrate that the proposal does not result in any disproportionate change in the bulk and character of the original buildings, does not significantly increase the built up appearance of the site or injure the visual amenities of the Green Belt by reason of siting, materials, design, traffic or activities generated. In this case this has not been demonstrated and the proposal is thus unacceptable.

### 7.02 Density of the proposed development

Not applicable to this application.

# 7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

Not applicable to the application.

# 7.04 Airport safeguarding

Not applicable to the application.

# 7.05 Impact on the green belt

Planning Policy Guidance Note 2: Green Belts (PPG2) states that the most important attribute of the Green Belt is its openness. Therefore, the construction of new buildings in the Green Belt is inappropriate unless it is for a limited range of uses including agriculture, forestry, recreation, limited alteration/re-building of dwellings, and infilling major developed sites as identified in adopted plans.

PPG2 also makes clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. The guidance adds that such circumstances will not exist unless the harm is clearly outweighed by other considerations and that it is for the applicant to show why permission should be granted. Although the existing use does not form part of those acceptable uses within the Green Belt, the application site is an established builder's merchant yard with associated buildings, within the Green Belt. The applicant has not provided any justification as to why the proposal should be allowed in the Green Belt other than saying that the proposed building is to replace "a collection of older structures on the site which have reached the end of their useful life and are generally unsightly". As such, the main policy issue in relation to this development is the principle of additional development within the Green Belt and its impact on the character and appearance of the Green Belt.

Whilst the builder's merchant is well screened from the north by woodland, the yard with storage and a single-storey building is otherwise out of character with the rural appearance of the open space when viewed from the west and south of Joel Street and other vantage points. The existing structures which have been extended throughout the years on the site, including the single-storey sales office structure, have a combined floor area of 147.04m<sup>2</sup> while the proposed structure would have an internal floor area of 314.96m<sup>2</sup>, 167m<sup>2</sup> more than the existing, an increase of 188%.

The proposed replacement commercial building would be considerably larger than the existing buildings and very different in style. Firmly established planning policies are intended to protect the Green Belt from inappropriate development, including 'saved' Policy OL4 of the London Borough of Hillingdon Unitary Development Plan, which relates to replacement buildings. 'Planning Policy Guidance Note No. 2: Green Belts' also explains that new buildings are generally considered to be 'inappropriate' in planning terms, including a replacement dwelling if it would be materially larger than the original building that it replaces. The concept of materiality is not to be determined merely by a mechanical calculation, however, and it is necessary to consider the development scheme as a whole, in relation to the buildings it is to replace.

The proposed replacement building would not only be larger than the existing structures but would be constructed in a much grander style. On balance, it is considered that the change in scale would be significant and that the new commercial building would amount to 'inappropriate' development in the Green Belt.

The design of the proposed building is very different from the modest architectural statement of the existing buildings. The new building would have a wide span and a mixture of roof pitch and form. The aim of achieving good design in buildings underlies the planning system and is expressed, for example, in 'Planning Policy Statement 1: Delivering Sustainable Development'. Policies BE13and OL4 of the adopted Hillingdon Unitary Development Plan (Saved Policies, September 2007) states, that the replacement or extension of buildings in the Green Belt will be permitted only if the development would not result in a disproportionate change in the bulk and character of the original building or significantly increase the built-up appearance of the Green Belt. The proposal would increase the bulk of building on the site, which, although not unacceptable in design terms, would be a departure from the simple, understated appearance of the existing single-storey structure, and an increase in the massing of the built form, impacting on the openness of the Green Belt. Although sited away from the road and at a low point within the plot, where it is part-screened by the woodland to the north, it will however appear visually intrusive within the Green Belt from all other viewpoints. The proposal is therefore considered to be contrary to the stated policy. The proposal has not overcome the 1st and 2nd reasons for refusal of the previous scheme.

OTHER DEVELOPMENTS ON THE SITE THAT MAY IMPACT ON THE OPEN CHARACTER AND VISUAL AMENITIES OF THE SURROUNDING AREA.

It should be noted that unlike the previously refused scheme, the current application does not include the retention of the blue painted 4m high freestanding storage racks and the 2.5m high metal railings (fencing) erected along the side (northern) boundary of the site. The rack structure is 2.55m wide, 17.8m long, covering an area of 45.4m<sup>2</sup> whilst the fencing which joins with the existing is 2.1m high Palisade fence and 36.6m long. Further to this, additional lighting poles have been installed along the perimeter fencing. These lights tower above the existing perimeter fencing, and as such may require planning permission. This matter is currently under investigation by the Planning Enforcement Team.

#### 7.06 Environmental Impact

Not applicable to the application.

#### 7.07 Impact on the character & appearance of the area

Refer to section 7.5.

7.08 Impact on neighbours

There are residential properties on the west side of Joel Street that face the application property. However, given the nature of the development and distance of the nearest residential property, which is at least 45m away, the residential amenities of those properties, in terms of loss of light, overshadowing or loss of privacy, would not be adversely affected in accordance with Policies BE20, BE21 and BE24 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

#### 7.09 Living conditions for future occupiers

Not applicable to the application.

## 7.10 Traffic impact, car/cycle parking, pedestrian safety

Although the application site is an established builder's yard, the proposed development would result in an increase of the area occupied by structures and buildings. The applicants have argued that "parking off-street will be available as a consequence of the reorganisation of the overall site, primarily in front of the new building, although in an informal manner. The number of on-site personnel is relatively small, between three and four in number. Major traffic will be customers arriving to purchase the various products and loading the varying types of vehicles, for which there is currently more than adequate provision; that by controlling the material currently stored externally under cover, that is proposed to be within the new building, this will allow for more delivery vehicle manoeuvring space".

However, whilst the applicant is not proposing an increase in the number of deliveries from its present 2 per day, the proposed plans do not indicate the provision of off-street parking or a manoeuvring area for large vehicles and staff cars. As the use of lorries for the site currently causes traffic issues in Joel Street, and the size of the building is more than doubling together with the installation of the racking system, it cannot be ascertained what the remaining area for parking and manoeuvring is from the submitted plans. It is considered that the proposal would result in an intensification of the use of the site, and as such would impact negatively on traffic flow in the immediate surroundings to the detriment of vehicular and pedestrian safety. The proposal is therefore considered to be contrary to Policies AM2 and AM14 of the Hillingdon UDP Saved Policies (September 2007). The Council's Highways Engineer has raised objection to the proposal for this reason. The proposal has not overcome the 5th reason for refusal of the previous scheme.

# 7.11 Urban design, access and security

Refer to section 7.5.

# 7.12 Disabled access

The proposed building would have a level access from the main entrance and adequate ramps to other entrances into the building in compliance with Policy R16 of the Hillingdon Saved Policies (September 2007) and the Council's HDAS (SPD) 'Accessible Hillingdon'.

# 7.13 Provision of affordable & special needs housing

Not applicable to the application.

# 7.14 Trees, Landscaping and Ecology

Policy OL2 of the adopted Hillingdon Unitary Development Plan (Saved Policies September 2007) states that, within the Green Belt the Local Planning Authority will, where appropriate, seek comprehensive landscape improvements. Whilst there are trees and greenery to the north of the application site that would provide sufficient screening of the proposed railings, no visual or landscape impact analysis has been submitted and no landscape proposals made to mitigate the impact of the proposal on its surroundings. As such, it is considered

that the proposal would have a detrimental impact on the character of the Green Belt contrary to Policy OL2 and fails to enhance the landscape quality of the site in accordance with Policy BE38 of the Hillingdon Unitary Development Plan Saved Policies (September 2007). The proposal has not overcome the 4th reason for refusal of the previous scheme.

#### 7.15 Sustainable waste management

The business operating from the site ultimately has discretion over waste management method they intend to use because the application is for a commercial development.

The applicants have advised that general waste produced by the new facilities will not differ from the current arrangement and disposal of material will be in accordance with commercial guidelines.

The location of the refuse storage area is not shown of the submitted drawings. However, a condition requiring submission of details of siting of waste storage area and collection method for approval prior to any occupation can be recommended in the case of an approval.

### 7.16 Renewable energy / Sustainability

Not applicable to the application.

### 7.17 Flooding or Drainage Issues

Not applicable to the application.

# 7.18 Noise or Air Quality Issues

The Council's Environmental Protection Unit has raised no objection to the proposal subject to conditions controlling hours of operations, deliveries and collection, including waste collection and noise from any extraction system.

#### 7.19 Comments on Public Consultations

In relation to the objections, the merits of the proposal are discussed above. The use of the site is established and the applicant is not proposing an increase in the number of deliveries from its present 2 per day. However, traffic issues raised have been considered in the report. The issue of pressure on existing drainage/sewerage system is outside planning control. There are no controls over the height of the storage on the site and in relation to future applications/developments they must be treated on their merits.

# 7.20 Planning Obligations

Not applicable to the application.

# 7.21 Expediency of enforcement action

Not applicable to the application.

7.22 Other Issues

None

# 8. Observations of the Borough Solicitor

When making their decision, Members must have regard to all relevant planning legislation, regulations, guidance, circulars and Council policies. This will enable them to make an informed decision in respect of an application.

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights (the Convention) directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

Article 6 deals with procedural fairness. If normal committee procedures are followed, it is unlikely that this article will be breached.

Article 1 of the First Protocol and Article 8 are not absolute rights and infringements of these rights protected under these are allowed in certain defined circumstances, for example where required by law. However any infringement must be proportionate, which means it must achieve a fair balance between the public interest and the private interest infringed and must not go beyond what is needed to achieve its objective.

Article 14 states that the rights under the Convention shall be secured without discrimination on grounds of 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

### 9. Observations of the Director of Finance

As there are no S106 or enforcement issues involved, the recommendations have no financial implications for the Planning Committee or the Council. The officer recommendations are based upon planning considerations only and therefore, if agreed by the Planning Committee, they should reduce the risk of a successful challenge being made at a later stage. Hence, adopting the recommendations will reduce the possibility of unbudgeted calls upon the Council's financial resources, and the associated financial risk to the Council.

#### 10. CONCLUSION

The proposal is considered to be detrimental to the open character of the Green Belt and visual amenities of the street scene contrary to Policy OL4 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).Furthermore, landscape and highway issues have not been addressed by the applicant. The application is therefore recommended for refusal.

# **11. Reference Documents**

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