

REPRESENTOR SUBMISSION

SOUTH KESTEVEN DISTRICT COUNCIL

LOCAL PLAN REVIEW, 2024. REGULATION 18 CONSULTATION RESPONSE

Thank you for the opportunity to comment on your Draft Local Plan 2021 - 2041. My comments are directed towards the tension between Policies EN6 (Page 107) with Policy GR1 (Page 130), and Policy SKPR-57 (Page 143).

Belton House and Park

You say at paragraph 9.45 of your Draft Plan, "The visitor economy is an important part of South Kesteven's local economy. In 2021, the District attracted 2.72 million visitors, generating over £168.63 million and supporting 2,232 jobs." You put Belton House at the top of your list of "major attractions". You describe these assets in your Policy GR1, Page 130, as "nationally and internationally significant heritage assets located in close proximity to the northern edge of the existing built-up area of Grantham."

Belton House and its park and garden are a Grade 1 Listed Building and a Grade 1 Registered Park and Garden. The setting of these assets within the landscape is defined by The Belton House and Park Setting Study, a document jointly sponsored by The National Trust and SKDC. Pages 107-108 and 129-130 of your Draft Plan set out your policy on how you intend to protect these assets -.

"The Council will seek to protect and enhance heritage assets and their settings in keeping with the policies in the National Planning Policy Framework. Development that is likely to cause harm to the significance of a heritage asset or its setting will only be granted permission where the public benefits of the proposal outweigh the potential harm.

Proposals which would conserve or enhance the significance of the asset shall be considered favourably. Substantial harm or total loss will be resisted.

A Heritage Impact Assessment [HIA] should be provided which considers:

- f. the overall significance of the heritage asset, including its architectural, archaeological and historic interest, and its contribution to the local character of the surrounding area;
- g. the setting of the asset and its contribution to the surrounding area;
- h. the extent of the public benefits created by the proposed works."

You say at Page 130 of your Draft Plan, "Policy GR1 is considered robust and no amendments are proposed at this draft stage."

I set have out your declared policy in order to emphasise the Council's published view of its approach to protecting the Belton Estate and its setting. It speaks for itself and requires no further

comment, save to express the view that a policy considered robust in its text also requires robust attention to its implementation.

Belton House and Park Setting Study, ATKINS, 2010 (BHPSS)

This document demonstrates that Site SKPR-57 is firmly within the setting of Belton House as defined in its Fig 15, specifically in Element 1, which illustrates what can be seen ("key views") from the House roof and the Bellmount Tower. You confirm your agreement with this in your site assessment of the southern part of SKPR-57, dated 22nd October 2015, - "Within setting of Belton House and Park and Gardens"; "Extensive views over open countryside to north-east - view of Bellmount Tower and Belton House"; "Constraints. Potential impact on setting of Belton House".

Paragraph 3.4.1 of the BHPSS discusses the effect of 'major development' (includes developments that trigger an Environmental Impact Assessment) on ground in Element 1,

"This visible ground is mostly raised ground that appears above the tree screens within the park. It also includes areas of flat ground as set out in 3.2.1 above.

The raised ground visible above the tree screens in the significant views from the park is **very sensitive** to major development as such development is likely to adversely affect the significance of the significant views."

Paragraph 3.6.6 sets out a "Table summarising the sensitivity to development of the different aspects of Belton House and Park's setting". In respect of major development in Element 1, the Table says,

"Exceptionally sensitive. Unlikely to be suited for this form of development, except on flat ground 2-5km from the park, where it would have to be 2 storeys or less and in excess of 5km where development should not be tall."

Distances

The final sentence of paragraph 3.1 in the BHPSS is in error: -

"For ease, these areas are shown on Figure 15 with an outer boundary that broadly defines the setting of the park. For reference purposes, this plan also includes a 2km and 5km boundary from the edge of the Registered Park".

Distances were set by indicative distance-rings on Fig 15 of BHPSS, measured from a notional centre of the Park, not its boundary, which is an irregular form. The text of Section 3 of the Study refers to distances from the boundary of the Park, not Fig 15. Simply because the distance rings on Fig 15 are regular circles illustrating the extrapolation of an irregular shape across the terrain, and because the wrong datum is applied, Fig 15's distance-rings are indicative of nothing reliable. The Planning Inspector examining your (examined 2012, adopted 2014) 'Site Allocation And Policies' DPD saw the point, hence the Statement of Common Ground.

Statement Of Common Ground, 2012. (SoCG) Not in the Evidence Base.

“SESSION 10: BELTON HOUSE and HERITAGE ASSETS”

“The National Trust, English Heritage and South Kesteven District Council have agreed and signed a Statement of Common Ground [SES3] which addresses the protection given to Belton House and Parkland.”

“The Council suggests to the Inspector that the policy is changed to that in the Statement of Common Ground referred to above.”

(SKDC, 'South Kesteven Local Plan, Site Allocation And Policies DPD', SKDC written Examination Statement, 6th November 2012)

The contradiction between Fig 15 and the text of Section 3 was dealt with by the Planning Inspector in 2012 when he encouraged SKDC to draw up a Statement Of Common Ground between SKDC, National Trust and English Heritage (now Historic England) to settle the contradiction by agreement. The text of Section 3 was chosen by the signatories, not Fig 15. See paragraphs 2.6 and 2.8 of the signed SoCG. (Document EX/SKDC/45 in the 2020 Plan library). The Council accepted this SoCG as a 'Main Modification' to its 'Site Allocation And Policies Development Plan', 2012, adopted in SKDC Cabinet in June, 2014, and now absorbed into the 2020 Plan currently under review. This agreed settlement of distance-measuring becomes important to the Council, their consultants, and to developers, both in the assessment of planning applications against the BHPSS, and any HIA. In effect, this acknowledges that some land (e.g. SKPR-57), previously indicated as 2km - 5km from the heritage site, is within 2 km of it.

“The 2km extent is important as this broadly marks the distance at which small scale development would not be visually prominent and would generally be difficult to perceive in views.” (BHPSS, paragraph 3.2.1.) This sentence illustrates the significance of agreed distance. 'Small scale development' needn't concern us unless the very limited development of SKPR-57 speculated by the Landscape Sensitivity and Capacity Study, 2013, was being considered (see later).

Your previous Head Of Planning Policy judged the SoCG “an important document” and told me that he may liaise with the National Trust with a view to having the SoCG incorporated into a revised BHPSS. It seems that he didn't do so before he left. Fig 15 remains untouched, and is thus deceptive.

New Policy SKPR - 57, Land At Great Gonerby, Pages 143 – 144

SKPR-57 is being put forward by the Council as a 'Proposed Residential Allocation'. New site allocations are proposed to meet the minimum housing requirement for South Kesteven over the plan period, however, that minimum requirement has a 20-21% oversupply built into it (Paragraph 6.6 of the Draft Plan).

This policy site is a housing allocation for 628 dwellings on land which is located within both Grantham and Great Gonerby on rising ground. It was previously considered as two distinct sites on the north and south sides of a tree screen. Paragraph 12.22 of the Plan states that the proposed site allocation, with others, "ensures development is located in the most sustainable locations and ensures Grantham meets its growth needs". The 'sustainability' of SKPR-57, or how the site

measures against the Environmental Objective in “achieving sustainable development” in The National Planning Policy Framework, merits scrutiny.

The northern site was deliberately omitted from the 2012 Plan (as Site 33).

"....the housing sites that were put forward to the Council by developers or land owners to be considered through the Council's Strategic Housing Land Availability Assessment (SHLAA). During the preparation of the Grantham Area Action Plan Preferred Approach these sites were further assessed, but they were found not to be suitable for allocation for the use suggested -

(Site 33) Proposed housing developments would be out of scale and context of the area

Area of high landscape sensitivity

Access and traffic generation issues, impacting significantly on the existing network.

Significant visual impact on the character of the area

Potential noise and contamination issues on part of site adjacent to the railway line".

(Housing and Employment Sites Not Included in the Grantham Area Action Plan', SKDC, 2011)

The southern site was previously known as 'The Peachwood Close Site', or GRAH3 in 2012.

GRAH3

This site was given its own public examination session by the Senior Planning Inspector in 2012 because of the strength of public feeling against it. The landowner was represented by a land agent who hardly spoke. The "preferred developer" did not appear. The site was not proposed in 2020.

In reporting to the Council that he could not recommend adoption of the 2012 Plan, the Planning Inspector was severely critical of, *inter alia*, the Council's site selection process and chose GRAH 3 as an example. In the paragraph beginning at the foot of Page 5 of his report he writes: -

"More commonly the inconsistency in site selection manifests itself in a simple choice of sites. For instance, a number of sites have been rejected because of their impact on the countryside. However, the Policy GRAH3 site is also a widely visible greenfield site but is allocated for development even though it has the additional disbenefit of being potentially harmful to the setting [of] Grade 1 Belton House Registered Park and Garden and English Heritage are opposed to its development. I find the rationale behind these decisions difficult to understand."

SKDC accepted the Inspector's report in Cabinet in January 2013. SKDC Senior Planning Officer, Ms Brannon, may remember reading this when we met in November, 2018.

Recent Site Assessments of SKPR-57

The Draft Plan (Page 143) –

You write: -

“(h)” Impact on heritage features will need to be considered, specifically the development should incorporate views towards heritage assets, (i.e. Bellmount Tower, Belton House Grade 1 Park and Garden, St Wulfrums Church, St Johns Church) and their settings”. This must be wrong!. If a development can view these assets, then the assets can view the development, exactly what your heritage protection policy is intended to prevent. Did you mean to say, “...should NOT include....”?

“(i) The development must take into account the Belton House [And] Park Setting Study in Policy GR1”. Unamended, (h) drives a coach and horses through the Study!

In passing, at (b) you say “No development will occur above the 60m contour”. My research indicates that there is no land on this site below the 60m contour except for a small pocket close to the north-east corner of the site, not adjacent to a road, and bordered by the railway and land above 60m. Where do the promoters of SKPR–57 propose to build?

Sustainability Appraisal, AECOM, February, 2024 (in the Draft Plan library)

Paragraphs 6.28 – 6.35, (potential sites with a listed building within or nearby) make no mention of Site SKPR- 57. The Technical Annexe Part 1 omits mention of Belton House as a Grade 1 Listed Building near SKPR -57. It does, however, mention the Grade 1 Listed Park and Garden, 1562m away at Belton House. AECOM may have made errors, but they must have used precise technical mapping to arrive at a distance accurate to 1 metre. Helpfully, AECOM have inadvertently confirmed that the 2km distance ring on Fig 15 of BHPSS is a half-kilometre too short.

SKDC Draft Site Assessments Report, February 2024 (in the Draft Plan library)

Site SKPR-57 at Page 235. Your own site assessment makes no reference to Belton House, only its park and garden. Reference is only to distance as-the-crow-flies, not the topography and how it is affected by BHPSS.

At page 93 of your Draft Plan, you write, “In assessing the impact of proposed development on the Landscape, relevant Landscape Character Appraisals [LCA] should be considered.” Your site assessment report is quiet on the desirability of an LCA for SKPR-57.

Beyond the thread of this submission, I note that the site assessment touches on available roads - “c. The development will make provision towards the upgrading of Belton Lane/Newark Hill junction and footway and cycle connections”, Page 143. Can the reader take it that the assessor was fully aware of Belton Lane's three constraints which may be very briefly described as, the lane itself, the railway bridge, and the Newark Hill junction? For example, the junction remodelling, already challenged by grade separation, will require civil engineering incursion into the astro-turf courts of a village playing field, probably part of the new brick village hall, and definitely the newly-established cemetery on the opposite corner.

“Main Findings – Any impact on local heritage assets and settings can be appropriately mitigated”
How? This site is on rising ground, all 35 hectares (86 acres) of it, above and pointing directly at Belton House, less than 2km away. 'Impact' is inevitable. What does “appropriately” mean? A look at what has been previously said about the landscape might help to illuminate the real situation.

Landscape Studies

Paragraph 10.1, Draft Plan page 91: -

“The South Kesteven Landscape Character Assessment [FCPR, 2007] has been used by the Council to inform its Landscape Policy. This approach was adopted in the 2020 Local Plan. This piece of evidence has not been updated since then, however given it comments on landscape character which has not significantly altered this piece of evidence is not considered out of date.”

Page 60, Figure 17, of this document maps SKPR–57 as “Medium/High Sensitivity” for “Employment and Residential Development around Grantham” . Paragraph 4.131 of this document says, “The plan at Figure 17 shows area of sensitivity to new employment and residential purposes. Sensitivity would range from **Low** to **High**, depending on the nature of the site, and the scale and type of the development proposal. In general terms new development should avoid the higher valley slopes, and should not establish new built development on the skyline.”

For planning purposes, this Landscape Character Assessment is of limited utility. There are sources available which are more recent and detailed. Your 'Points Of The Compass' Appraisal, (Policy EN1, page 93 of the Draft Plan), February 24, does not review this site but directs the reader to: -

'Landscape Sensitivity and Capacity Study of Specified Areas in Grantham', October 2013, Report for South Kesteven District Council by Bayou Bluenvironment' Not in the Evidence Base.

Page 59

Study Area G1B (from 2011 DTA study). The northern portion of SKPR-57 .

- An intimate, small scale landscape on the lower ground in the north and east of the Study Area, which is sensitive to development that adversely affects important landscape features and characteristics;
- The higher ground to the west of the Study Area is more visually prominent as it rises up to the ridgeline to the east of Great Gonerby;
- **The east-facing scarp slope is important to the setting of Belton House and parkland;**
- The western corner of the Study Area, despite being prominent, may have capacity to accommodate small scale housing as an extension to existing modern residential development on Holden Way, Kelham Road and Woffindin Close on the eastern edge of Great Gonerby providing it did not narrow the important green open gap preventing coalescence of Grantham and Great Gonerby;
- Mitigation by way of appropriate structural planting should aim to provide a soft edge to assimilate any new development into the countryside.

Study Area G1A (from 2011 DTA study) The southern portion of SKPR-57

- Generally sensitive to conspicuous development in the countryside, especially on higher ground, which **could not be successfully mitigated**;
- Development in the north of the area would be isolated from the town and would detract from important aspects of settlement form and pattern;
- The higher ground to the west of the area is part of the important green open gap preventing coalescence of Grantham and Great Gonerby;
- **The higher ground to the west of the area is important to the setting of Belton House and parkland**;
- Lower lying ground to the south and east of the area is less sensitive where residential development could have some association with adjacent modern housing to the south and east beyond the railway line;
- Mitigation by way of appropriate structural planting should aim to provide a soft northern edge to assimilate any new development into the countryside.

At Page 56, in tabular form, both study areas are assessed as, 'Landscape Sensitivity – High', 'Landscape Capacity – Low'. Both assessments find that the separate sites are in the setting of Belton House. These assessments admit of some possibility of small scale development in their extremities, but they would not be contiguous. The mitigations described for these potential locations are aimed at speculative 'edge-softening', not screening.

The developable parts identified in this assessment are small, at opposite ends of SKPR-57, with no prestigious entrance on a significant thoroughfare. and unlikely to be attractive to a mass-market developer. On the basis of this Study, SKPR-57 will not provide the 628 units that your Draft Plan hoped for.

'Grantham Capacity and Limits To Growth Study', Final Report 2015, AECOM
Commissioned by SKDC. (GCLGS) Not in the Evidence Base.

For convenience – and brevity - I reproduce those parts of this Study that AECOM themselves drew the Council's attention to in an email in September, 2018. Later identified as Document EX/SKDC/44 in the 2020 Plan Examination library, the email made no public appearance until the public session relevant to it had passed.

GCLGS, Page 75. -

“More important would be the land’s visibility from Belton House and grounds, as Gonerby Hill rises steeply on the western part of the site. This land was assessed as Element 1 in the Belton House Setting Study, but much of it is just beyond the 2km mark from the centre of the park. Therefore, the assessment of the Setting Study for development on flat land in this location would be ‘not sensitive’.

However, the land up the hill would be more sensitive, although it is more than 2km from the park, meaning it would be rated ‘sensitive’ to development rather than ‘exceptionally sensitive’.

Additionally, like the rest of Gonerby Hill Foot, development up the slope here would have the potential to impact on the perception of Grantham as being surrounded by a ‘green bowl’ of hills, particularly on views into the town from the east and south. In this

regard it could therefore affect the setting of St Wulfram's Church spire, which is a Grade 1 listed heritage asset."

GCLGS, Page 77. -

"To the west of the railway line, the raised land, as noted above, could be considered 'sensitive' from the perspective of the Belton House Setting Study. However, as Element 1 land, it performs no worse than the land south of the pylons to the east of the railway line in this regard.

More importantly, development here would have the potential to further disrupt the perception of Grantham as set in a 'green bowl' of hills (already negatively impacted by Gonerby Hill Foot), and may have an impact on the setting of St Wulfram's church spire (which is a Grade I listed building) as viewed from the east, south-east and south. This area is classified as medium-high sensitivity in the Landscape Sensitivity and Capacity Study. As such, we judge that the land west of the railway line that is higher on the slopes of Gonerby Hill is **not suitable** for development."

In that email, AECOM explain that that they were not aware of the Statement Of Common Ground and how it would affect their understanding of distances. They could not find it on your web-site (because it wasn't there, apparently due to an indexing failure) but had used Fig 15. They also say in extracts, -

"If you think what he says is correct, then a note to this effect should be added to the BHPSS, or to its Figure 15, or both, where it appears on your website, and the note should include a link to the Statement of Common Ground, which should be put online if it exists and is not already online."

"The consultee's specific reference to our study (page 75, third paragraph) states that we have therefore incorrectly labelled land on the eastern flank of Gonerby Hill as 'sensitive' to development for the purposes of the BHPSS, rather than 'exceptionally sensitive'. We would note that, if everything he says is correct, this is indeed text to be amended, but that it did not have any effect on our conclusions, and neither would correction of the error, as we have not regarded the land as suitable for development in any case."

"We would be more than happy to make the minor change that the Capacity and Limits to Growth Study may need here and elsewhere to take account of this point, but please note that it would be very difficult to do so without a fully revised Figure 15 in the terms described, as otherwise we would have to guess in each location what the revised Figure might look like and hence what its impacts would be for the purposes of our assessment."

In essence, AECOM, when finally acquainted with the SoCG, were willing to revise their finding regarding SKPR-57 from 'sensitive' to 'exceptionally sensitive' if SKDC would confirm the SoCG, send a revised Fig 15, and commission the work. Were they sent a revised Fig 15 and confirmation of the contents of the SoCG? My written request to you at the time to confirm that these things had been done was never responded to. This may well explain why their site analysis of SKPR-57 in their Sustainability Appraisal is so imprecise on its relationship to Belton House. I note that the SoCG does not appear in your evidence base for

this review. As with Fig 15, the GCLGS also remains unamended, but, as AECOM say, the land is unsuitable for development in any event.

The Tree Screen

There is a tree screen on the site dividing the old GRAH 3 in the south from the remainder of the new allocation which extends to Belton Lane, Gonerby. The screen begins just north of Lynden Avenue down to the railway. Although a home for wildlife, the purpose of it is indeterminate. If it was intended to screen GRAH3 from Belton House, it fails. The screen begins on the wrong orientation, i.e., at the top of the slope its flanks face north/south when they should be facing east/west. At the bottom of the slope, although oriented closer to east/west, it is not tall enough to screen development from Belton House and has now reached its growth potential.

In addition, the proposed SKPR-57 requires building on both sides of the screen, which defeats it. This screen is at least 15 metres deep for a considerable distance, sitting on a significant acreage of land for house-building. The developer will sweep it away as a pointless obstruction.

The National Planning Policy Framework, 2023.

You say at Page 107 that your efforts to protect Belton House will respect the NPPF, - a matter upon which the Planning Inspectorate is required to be satisfied before recommending adoption of your Plan. The Government policy of December 19th, 2023, as set out in the NPPF, is uncompromising -

“**203.** In determining applications, local planning authorities should take account of:

- (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- (b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;

206. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, **or from development within its setting**), should require clear and convincing justification. Substantial harm to or loss of:

- (a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- (b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, **grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.**”

N.P.P.F Glossary extract -

“Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

“Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. **Significance derives not only from a heritage asset’s physical presence, but also from its setting.** For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”

Conclusions

1. The Statement Of Common Ground

The Statement Of Common Ground is essential to the Council's policy-thinking, as is cross-referencing it in relevant documents to prevent misreading and errors, as AECOM suggested in 2018. Having been encouraged to reluctantly re-surface during the 2020 Plan Public Examination, the SoCG appears to have slipped below the waves again, following the 2020 Inspector's dismissal of the suggested incorporation of a reference to the SoCG in Policy GR1 (Inspector's Final Report, 2019, paras 94 – 100). However, I have to say that I fear he missed the point, now vital to proper consideration of SKPR–57. It seems incongruous to focus on an unsigned appendix to an agreement and ignore the signed content of the mother document, in particular Clauses 2.6. and 2.8.

One hesitates to precipitate a 'Battle Of The Experts' in any matter requiring a finding, or, as in this case, a 'Battle Of The Planning Inspectors'. The important point is that SKDC asked for, and adopted, the 2012 Inspector's recommended Main Modification that a SoCG was required. This now proves to have been wise. If SKDC no longer wish to be bound by the SoCG, your Plan should say so. National Trust and Historic England (then English Heritage), the other signatories to it, should be informed.

2. An Unsound Development Plan

Site SKPR–57 is proposed as necessary to meet SKDC's house-building needs (+ 20%, an extra 2,800 units) but it is in the setting of a listed building and grounds, and a valued landscape. The proposal may fall when subjected to scrutiny by a HIA, LCA and NPPF. All previous site studies have rejected this site as a whole, or at least acknowledged its special unsuitability and limits. The possibility is real that the site, on serious examination, cannot sustainably deliver 628 units, rendering the development plan unsound. Unless, of course, the HIA and LCA assessments have been pre-judged? Have they been prepared? Can we see them?

3. The Council's Decision-making

In deciding the issue, the Council proposes to use the 'Balance Of Harms' test, i.e. between good and evil - “where the public benefits of the proposal outweigh the potential harm”. It can always be argued that there is public benefit in building houses; people need homes, the community needs the economic benefit that the jobs provide. The first benefit applies to any site; the second is merely temporary. Equally, there is public benefit in preserving an historic asset and tourist attraction in the setting in which it was intended to be enjoyed, (see BHPSS, paras 1.4.1 and 2.2). There is public benefit in leaving this land in its natural state as a valued amenity. I understand that you may have received a number comments from the public on that point. The outcome of any 'balance of harms' test is entirely dependent on what you choose to put on the scales.

Your test applied to the facts does not explain why there needs to be building on SKPR-57, with all its uncertainties, especially as the Draft Plan has 20% extra 'wiggle-room' baked in. Those needs can be addressed on any site elsewhere not encumbered with this site's constraints. Or, you could reduce your housing needs buffer as unachievable. In respect of Belton House, your policy does not require evidence of harm, merely potential harm. The academic studies in your policy banks and your own earlier site assessments have made clear the risk of potential harm.

4. The Effect Of Government Policy

The latest NPPF applies a stricter and more demanding test. Its starting point is that building in the setting of Grade 1 heritage assets “should be wholly exceptional” and requires that harm to a heritage asset by building in its setting requires “clear and convincing justification”. In my view, you have not demonstrated that this high bar has any expectation of being reached after HIA and LCA. The Plan risks rejection by the Inspectorate on the ground of non-compliance with government policy.

I look forward to reading your response which I trust will positively address these comments as set out in Paragraph 5.1 of your Statement of Community Involvement, 2021, -

- “• We will ensure that results are fed back, and people are informed as to how their views have impacted on decisions

- We will make sure that we take appropriate action following consultation to improve service quality ”

In particular, I would welcome a positive confirmation that the Council's Conservation Officer is fully conversant with all the evidence that the Council holds, especially the Statement Of Common Ground, which might bear on full consideration of a HIA and LCA submitted by the promoters of SKPR-57.

Thank you again.

Robert Batchelor
Resident
14th April, 2024