# Development Management Report Committee Application

Summary		
Committee Meeting Date: 20 June 2017		
Application ID: LA04/2016/2219/F		
Proposal: Refurbishment and alterations to primary school including 2 single storey rear extensions and 2 storey rear extension. Construction of double nursery school building, car parking, landscaping, fencing and siteworks.	Location: Elmgrove Primary School (Avoniel Site) and Nursery Unit Avoniel Road Belfast BT5 4SF and lands to the rear of Avoniel Road Leisure Centre Avoniel Road	
Referral Route: Planning Committee – Major Application and site includes lands owned by BCC		
Recommendation:	APPROVAL	
Applicant Name and Address: Education Authority Belfast Region 40 Academy Street Belfast BT1 2NQ	Agent Name and Address: Todd Architects 2nd Floor Titanic House 6 Queens Road Belfast BT3 9DT	

#### **Executive Summary:**

The proposal is for refurbishment and alterations to the listed primary school including 2 single storey rear extensions and 2 storey rear extension. Construction of double nursery school building, car parking, landscaping, fencing and siteworks. The proposal will provide facilities for 681 pupils, and 112 staff.

The application site comprises an existing school campus at Avoniel Primary School which consists of a Listed building. The site also includes an area of land to the north of the site within the grounds of the Avoniel Leisure Centre.

The key issues in the assessment of the proposal are as follows:

- The principle/impact of alterations and development works on Listed Buildings
- Development/Loss of open space;
- Visual impacts of the proposal;
- Impact on amenity / character of the area;
- Impact on transport and other infrastructure;
- Flood risk from the proposal;
- Impact on natural heritage;

The extensions are mostly two storeys in height, with a separate detached single storey nursery building to be located to the south east to the front/side of the main building. In relation to design of the extensions and the nursery building, the proposed fenestrations are considered sympathetic to the listed building. Features of the Listed building will largely be retained and refurbished. HED have no objections to the proposals, which is a significant consideration, and

accordingly the application is considered compliant with PPS6, including BH8 AND 11.

The playground and space to the rear of Avoniel leisure Centre, given the poor condition/facilities of the school it is considered that the community benefit of refurbishment of a Listed Building, improved school facilities within the locality outweigh the retention of this space. In addition, the loss of the playground space is offset through the provision of a new facility to the south-east as part of the Connswater Greenway.

The proposal would result in built form being closer to adjacent residential buildings to the west of the site in Avoniel Road with a separation distance of approximately 23 metres. This is considered sufficient to mitigate amenity issues including overlooking and dominance issues. Adequate boundary treatment is proposed to mitigate disturbance.

#### Consultations

Environmental Health have concluded that the proposal would not detrimentally affect amenity through noise or light disturbance. Accordingly, the proposal is acceptable in relation to these issues.

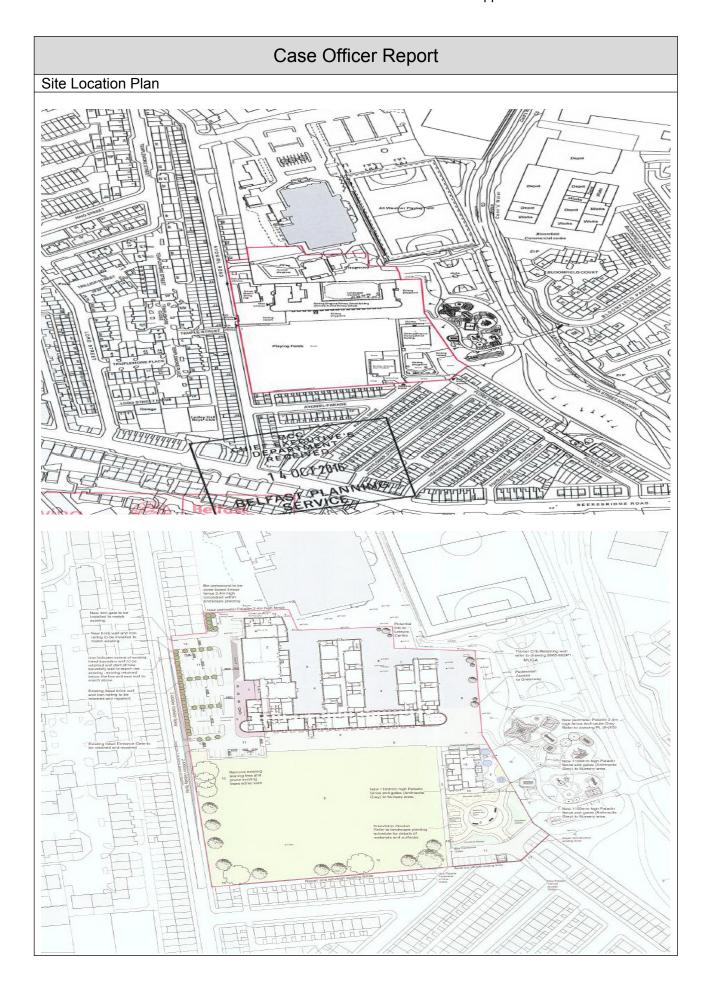
Natural Heritage have no objections to the proposal and accordingly the proposal is compliant with this criteria and policies of PPS2. The landscaping proposed will contribute to townscape in the immediate locality.

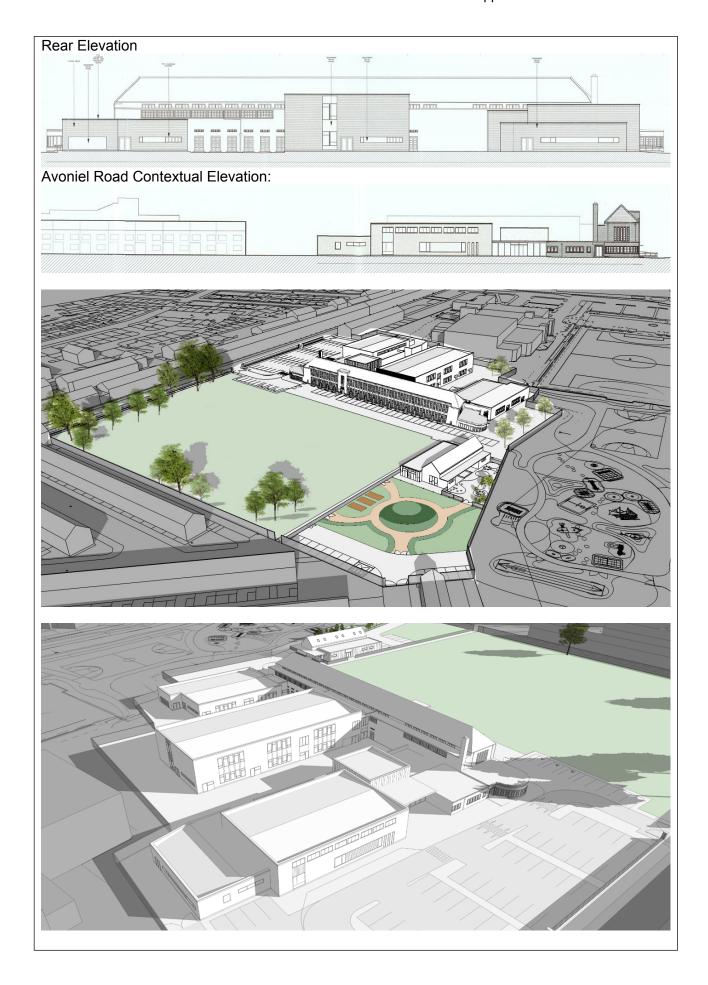
Transport NI Rivers Agency and NIW have considered the proposal and have no objections.

No objections have been received from neighbours or elected representatives.

#### Recommendation

Having regard to the policy context and other material considerations above, the proposal is considered acceptable and planning permission is recommended subject to conditions.





Representations:	
Letters of Support	None Received
Letters of Objection	None Received
Number of Support Petitions and	No Petitions Received
signatures	
Number of Petitions of Objection and	No Petitions Received
signatures	
Representations from Elected	Cllr Newton - support
Representatives	

1.0	Description of Proposed Development
	Refurbishment and alterations to primary school including 2 single storey rear extensions and 2 storey rear extension. Construction of a new double nursery school building, car parking, landscaping, fencing and siteworks.
	The proposal will provide facilities for 681 pupils, and 112 staff.
2.0	Description of Site
2.1	The application site comprises an existing school campus at Avoniel Primary School which consists of a Listed building, two storeys in height with hipped and pitched roof, with detached single storey canteen and two nursery school buildings within the grounds. To the front of the school, there is a large grassed area with hardstanding parking area adjacent to Avoniel Road. To the rear of the main school building, there is a courtyard area. Boundary treatments comprise a wall plinth and railings along the Avoniel Road frontage, with palisade fencing approx. 2m in height around the remainder of the site. The topography of the school grounds is generally level. There are a number of small groupings of mature trees around the periphery of the grassed area.
2.2	The site also includes an area of land to the north of the site within the grounds of the Avoniel Leisure Centre. This comprises a small playground area and single storey building in use as a nursery/playgroup facility.
2.3	The surrounding area is predominantly residential is terms of use - there are typical terraced dwellings opposite the site on Avoniel Road and to the south, Avoniel Leisure Centre to the North, and the Connswater Greenway abuts the site to the east.
Planni	ng Assessment of Policy and other Material Considerations
3.0	Site History
	Z/2007/1793/F Proposal: Erection of a temporary double unit nursery mobile and new access off Avoniel Drive Address: Avoniel Primary School, Avoniel Road, Belfast, BT5 4SF Decision: Approval Decision Date: 29.11.2007
4.0	Policy Framework
4.1	Belfast Urban Area Plan 2001 Draft Belfast Metropolitan Area Plan 2015

4.2	Regional Development Strategy (RDS); Strategic Planning Policy Statement (SPPS); PPS2: Natural Heritage; PPS3: Roads Considerations; PPS8: Open Space, Sport and Recreation; PPS15: Planning and Flood Risk; Development Control Advice Note 15 Vehicular Access Standards	
5.0	Statutory Consultee Responses  Transport NI – no objections; NI Water – no objections; Rivers Agency – no objections; Natural Heritage – no objections.	
6.0	Non Statutory Consultee Responses  Environmental Health – no objections	
7.0 7.1	Representations  The application has been neighbour notified and advertised in the local press. No representations have been received.	
8.0	Other Material Considerations None	
9.0	Assessment	
9.1	The key issues in the assessment of the proposal are as follows:  - The principle/impact of alterations and development works on Listed Buildings - Development/Loss of open space;; - Visual impacts of the proposal; - Impact on amenity / character of the area; - Impact on transport and other infrastructure; - Flood risk from the proposal; - Impact on natural heritage;  Policy Considerations:	
9.2	The SPPS sets out five core planning principles of the planning system, including improving health and well-being, supporting sustainable economic growth, creating and enhancing shared space, and supporting good design and place making. The SPPS states at paragraph 1.13 (page 7) that a number of policy statements, including PPS3, 4 and 8 remain applicable under 'transitional arrangements'.	
9.3	Paragraphs 4.11 and 4.12 require the safeguarding of residential and work environs and the protection of amenity. Paragraphs 4.13-8 highlight the importance of creating shared space, whilst paragraph 4.23-7 stress the importance of good design. Paragraphs 4.18-22 details that sustainable economic growth will be supported. Paragraphs 4.37-40 highlights the preservation and improvement of the built and natural environment.	
9.4	BMAP had been the development plan for the area following adoption in September 2014. However, the adoption process of this plan was subject to a successful legal challenge following judgement on 18 May 2017. However, the draft BMAP remains material and policies contained within are at an advanced stage and should be given	

	significant weight
9.5	The BUAP is the current development plan for the area. Part 9 regulation 32 and associated Schedule of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 states:
	'during the transitional period a departmental development plan shall operate as the local development plan for the area for which it is made and shall be treated for the purposes of the 2011 Act and any other enactment relating to planning as being the local development plan for the area'.
0.0	Part of the site is identified as open space, whilst the school lands are unzoned whiteland.
9.6	Part of the site is identified as open space whilst the school lands are unzoned whiteland within draft BMAP. It identifies an area of archaeological potential within part of the site.
9.8	PPS8 sets out regional policy for open space and recreation. OS1 refers to the protection of open space. This is relevant, as the proposal would result in an extended curtilage to the north to take in lands currently owned by the Council and comprising the development/loss of open space including a playground area and nursery/playgroup building at the rear of Avoniel Leisure Centre.
9.9	PPS2 Natural Heritage is relevant to the proposal given the trees within the site. NH2 relates to protected species, whilst NH5 relates to habitats, species or features of natural heritage importance.
9.10	PPS3 refers roads, access and parking considerations and is a material consideration in that any proposals must make necessary provisions for such matters. Car parking and servicing requirements are set out at AMP7, with design considerations set out at AMP9.
9.11	There is no specific planning polices for education uses within BUAP, dBMAP, SPPS, or Planning Policy Statements.
	Planning History:
9.12	There is no history of relevance to the current application.
9.12	Consideration
	The principle of extensions and new school buildings;
9.13	The proposed site is located within an existing primary school complex. The proposal includes removal of existing single storey nursery school and canteen buildings and erection of extensions to the listed main primary school building with nursery school unit within the grounds. The extensions are mostly two storeys in height, with a separate detached single storey nursery building. The extensions are considered acceptable in principle subject to acceptable design details that would not comprise the historic assets of the listed building or compromise neighbouring amenity. The siting of the nursery building is considered acceptable in principle as it is located in a roughly similar location to an existing nursery school building, again subject to satisfactory details and not adversely affecting the setting of the listed building or amenity of neighbouring properties.
	Loss of Open Space;
	The playground and space to the rear of Avoniel leisure Centre would meet one of the

9.14 typologies of open space discussed in annex A of PPS8. OS1 of PPS8 refers to the protection of open space and in summary states that such space shall be retained unless certain exceptional circumstances can be demonstrated, including where there is substantial community benefits. Given the poor condition/facilities of the school it is considered that the community benefit of improved school facilities within the locality outweigh the retention of this space. In addition, the loss of the playground space is offset through the provision of a new facility to the south-east as part of the Connswater Greenway.

Visual impacts of the proposal/ character of the area;

- The proposal replaces existing nursery school building with a new single building, mostly single storey in height located in the same position as the existing nursery school building. It is considered this building will have no greater visual impact on the locality than the existing building. In relation to the extensions, two of these are two storeys, whilst one is single storey. These extensions are visually subservient to the main school building and limited public views of these structures are available, restricted to partial views from the Greenway and the outside space of the Leisure Centre. There are hard-surfacing areas for play, circulation space, and car-parking. Boundary planting is proposed along the Avoniel frontage which will assist in mitigating the visual impacts of the proposed parking arrangements.
- Whilst the majority of the site is level in terms of topography, retaining structures are necessary between the school building and Avoniel Leisure Centre along what would become the northern site boundary. Structures will vary in height from 1.3m to 1.85m approximately. Whilst such an approach is not generally an appropriate response in terms of visual amenity, the structures in this location are not significant in height and would be subject to limited public views. Accordingly, it is not considered that these structures will adversely affect visual amenity.

Built Heritage and Design

In relation to design of the extensions and the nursery building, the proposed fenestrations are considered sympathetic to the listed building, with greater solid than void emphasis. The proposed fenestrations and materials are considered acceptable. Features of the Listed building will largely be retained and refurbished. HED have no objections to the proposals, which is a significant consideration, and accordingly the application is considered compliant with PPS6, including BH8 AND 11.

Impact on amenity;

- The proposal would result in built form being closer to adjacent residential buildings to the west of the site in Avoniel Road with a separation distance of approximately 23 metres. This is considered sufficient to mitigate amenity issues including overlooking and dominance.
- Residential buildings are located to the south of the site. 12 parking spaces are proposed along/adjacent to this boundary. Adequate boundary treatment is proposed to mitigate disturbance.
- In addition to the physical structures and the associated activity, Environmental Health have concluded that the proposal would not detrimentally affect amenity through noise or light disturbance. In addition, the extensive separation distances to residential properties will assist in mitigating disturbance in addition to the operating hours typical of a school facility. Accordingly, the proposal is acceptable in relation to these issues.

	Impact on Natural Heritage	
9.21	The site is not located within a conservation area, area of townscape character. Natural Heritage have no objections to the proposal and accordingly the proposal is compliant with this criteria and policies HN2 AND NH 5 of PPS2.	
9.22	In relation to landscaping and associated issues, the proposal includes landscaping mostly around the site periphery in addition to several grassed areas. Discussion with the departments' Tree/landscape officer indicates that the details of planting proposed is acceptable in terms of species and specification. The landscaping proposed will contribute to townscape in the immediate locality. Conditions are necessary to ensure adequate implementation, management and replacement arrangements.	
	Impact on transport and other infrastructure;	
9.23	Transport NI have considered the proposal and have no objections. Accordingly, the proposal is acceptable in terms of traffic, parking and access considerations and therefore in accordance with this criteria and relevant policy within PPS3.	
	Flood risk from the proposal;	
9.24	The proposal will reduce the extent of hard surfacing throughout the site, whilst permeable green areas will increase in the proposed layout. It is not therefore considered that the proposal would impact or increase on flood risk.	
	No objections to the proposal have been received from third parties.	
9.25 9.26	Section 27 also requires that a prospective applicant, prior to submitting a major applications must give notice, known as a 'Proposal of Application Notice' (PAN) that an application for planning permission for the development is to be submitted. A PAN (LA04/2016/0714/PAN) was submitted to the Council on 8th June 2016.	
9.27	Where pre-application community consultation has been required and a PAN has been submitted at least 12 weeks in advance of the application being submitted, the applicant must prepare a pre-application community consultation report to accompany the planning application.	
9.28	A Pre Application Community Consultation Report has been submitted in support of this application and is considered to meet the statutory requirements.	
10.0	Having regard to the policy context and other material considerations above, the proposal is considered acceptable and approval of planning permission is recommended due to compliance with policy and taking account of consultation responses.	
Neigh	Neighbour Notification Checked Yes	
Condi	tions	

#### Conditions

1. The development hereby permitted shall be begun before the expiration of 5 years from the date of this permission.

Reason: As required by Section 61 of the Planning Act (Northern Ireland) 2011.

2. No vents, extracts, or plumbing or pipes, other than rainwater pipes, shall be fixed on the external face of the building, unless shown on the approved drawings.

REASON: In the interests of visual amenity and to protect the architectural features of the Listed Building.

3. The development hereby permitted shall not commence until access has been provided in accordance with BCC stamped Drawing No 06A date stamped 24 May 2017.

Reason: to ensure adequate means of access in the interests of road safety and convenience of road users.

4. The development hereby permitted shall not become operational until parking has been provided in accordance with BCC stamped Drawing No 06A date stamped 24 May 2017.

Reason: to ensure the provision of adequate parking facilities in the interests of road safety and the convenience of road users.

5. The development hereby permitted shall operate in accordance with the approved Framework Travel Plan, Belfast Planning Service date stamped 30 September 2016.

Reason: To facilitate access to the site by means other than the private car and the servicing of the site in the interests of road safety and traffic progression.

6. The materials and construction method to be used in the construction of the external surfaces of the development hereby permitted shall be submitted to the Planning Authority for written agreement prior to commencement of any development on the site. The materials shall match in material, colour and texture those used in the existing building except where indicated on the approved plans.

REASON: In the interests of visual amenity and the character and appearance of the area.

7. All new internal works and finishes, and any works of making good, shall match the existing original fabric in respect of using materials of a matching form, composition and consistency, detailed execution and finished appearance, except where indicated otherwise on the drawings hereby approved. Samples of all materials to be used shall be submitted to the Local Planning Authority for written agreement prior to commencement of works to that element of the development on the site.

Reason: In order that the architectural and historic interest of this Building is safeguarded and in the interest of visual amenity.

8. No equipment, machinery or materials are to be brought on the site for the purpose of the development including demolition until a report detailing all protection measures for existing historic surfaces during the development has been submitted to and agreed in writing with the Local Planning Authority and verified by Historic Environment Division. All means of protection shall be retained in situ in accordance with the agreed details and for the duration of the development. The developer shall inform the Local Planning Authority on completing the installation of all protection measures so that the Local Planning Authority or their representative to agree such measures before allowing development to commence. Development shall not commence until these measures have been agreed by the Local Planning Authority in writing.

Reason: To ensure that adequate protection measures are put in place around listed building

features prior to the commencement of development to ensure that features are not damaged or otherwise adversely affected by building operations.

9. No development shall commence until full details of mechanical, electrical and audio installations route ways and installations impacting the architecture and detail of the listed building have been submitted to and agreed with the Local Planning Authority and verified with Historic Environment Division. The development shall be completed in accordance with the agreed details and no variations to the agreed scheme shall be implemented prior to the agreement of the Local Planning Authority in writing.

REASON: To protect the architectural features of the Listed Building.

10. No development shall commence on site until full details (including details of noise attenuation) of ventilation and filtration equipment to suppress and disperse any fumes and/or smell created from the cooking operations on the premises have been submitted to and approved in writing by the Local Planning Authority. The development shall not become operational until the approved equipment has been completed in accordance with the approved details and it shall be subsequently maintained in accordance with the approved details thereafter.

REASON: In order to safeguard the amenities of the area in which the development is located.

11. Prior to the occupation of any part of the development hereby approved, boundary walls and fencing in association with each dwelling shall be erected in accordance with the approved plans and shall be permanently retained thereafter.

Reason: In the interest of privacy and amenity.

12. No site works of any nature or development shall take place until a programme of archaeological work has been implemented, in accordance with a written scheme and programme prepared by a qualified archaeologist, submitted by the applicant and approved by the Department. The programme should provide for the identification and evaluation of archaeological remains within the site, for mitigation of the impacts of development, through excavation recording or by preservation of remains, and for preparation of an archaeological report.

Reason: to ensure that archaeological remains within the application site are properly identified, and protected or appropriately recorded.

13. Access shall be afforded to the site at all reasonable times to any archaeologist nominated by the Department to observe the operations and to monitor the implementation of archaeological requirements.

Reason: to monitor programmed works in order to ensure that identification, evaluation and appropriate recording of any archaeological remains, or any other specific work required by condition, or agreement is satisfactorily completed.

14. No development shall take place until a strategy of surface water drainage for the site using sustainable drainage methods has been submitted to and approved in writing by the Local Planning Authority. The approved development shall be implemented in accordance with the approved strategy prior to any part of the development hereby permitted becomes operational.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal.

ANNEX	
Date Valid	14th October 2016
Date First Advertised	28th October 2016
Date Last Advertised	9th June 2017

### **Details of Neighbour Notification** (all addresses)

10 Avoniel Parade, Ballymacarret, Belfast, Down, BT5 4SH,

41 – 45, 100 - 185 Avoniel Road, Ballymacarret, Belfast, Down, BT5 4SG,

2-8, 12-36 Avoniel Parade, Ballymacarret, Belfast, Down, BT5 4SH,

2, 25-35, 56-58 Bloomfield Court, Ballyhackamore, Belfast, Down, BT5 5AL,

34 Avonorr Drive, Ballyhackamore, Belfast, Down, BT5 5AJ,

62 Mayflower Street, Ballymacarret, Belfast, Down, BT5 4SL,

63 - 65 Flora Street, Ballymacarret, Belfast, Down, BT5 4SN,

70 - 78 Avoniel Road, Ballymacarret, Belfast, Down, BT5 4SF,

Avoniel Leisure Centre, Avoniel Road, Ballymacarret, Belfast, Down, BT5 4SF, Avoniel Nursery School, Avoniel Road, Ballymacarret, Belfast, Down, BT5 4SF,

Date of Last Neighbour Notification	6th June 2017
Date of EIA Determination	11.11.2016
ES Requested	No

#### **Planning History**

Ref ID: Z/2014/0780/A Proposal: School Signs

Address: Avoniel Primary School, Avoniel Road, Belfast, BT5 4SF,

Decision: CG

Decision Date: 26.08.2014

Ref ID: Z/2014/0797/LBC

Proposal: Sign A - Title sign on school building 3000x1500x3mm aluminium composite flat panel sign with yellow text and graphics

Sign B - Reception sign on school building 1000x250x3mm aluminium composite flat panel sign with yellow text and graphics

Sign C - Entrance sign, single sided, pole mounted 2440x1400x3mm aluminium composite panel sign with yellow text and graphics. the sign will be erected using 2no 4600x76mm OD galvanised steel posts

Sign D - Nursery sign fixed onto the nursery building 2440x1220x3mm aluminium composite flat panel sign

Address: Avoniel Primary School, Avoniel Road, Belfast, BT5 4SF,

Decision: CG

Decision Date: 26.08.2014

#### Ref ID: Z/2007/0350/F

Proposal: Proposed Connswater community greenway (a linear park) following the course of the Connswater, Loop and Knock rivers. This includes walkways, pedestrian crossings and cycle ways; landscaping, and allotments; bio-remediation of the river including limited realignment, cross section re-profiling, riffles, cascades, attenuation pools and reed beds, several minor footbridges across the river and 3 No. landmark foot and cycle bridges; street furniture, lighting, cycle stands, interpretation boards and CCTV; fencing and gates; limited car parking to provide disabled access to greenway and rationalisation of car parking at Holywood Arches and installation of weir infrastructure at entrance to Victoria Park.

Address: Lands extending from Victoria Pk to Cregagh Glen inc. parts of Cregagh Rd, Castlereagh College, Loop River Pk, Castlereagh Rd, Beersbridge Rd, Newtownards Rd, Sydenham Bypass, & lands in between. Also inc. lands extending from Beersbridge Rd to C

Decision:

Decision Date: 26.07.2007

Ref ID: Z/2007/0899/A

Proposal: Banners along route of Community Greenway.

Address: Lands extending from Victoria Park to Cregagh Glen.

Decision:

Decision Date: 13.09.2007

Ref ID: Z/2008/0795/F

Proposal: Variation of conditions 5 and 6 of planning approval Z/2007/0350/F - Proposed Connswater community greenway (a linear park) following the course of the Connswater, Loop and Knock rivers. This includes walkways, pedestrian crossings and cycle ways; landscaping, and allotments; bio-remediation of the river including limited realignment, cross section re-profiling, riffles, cascades, attenuation pools and reed beds, several minor footbridges across the river and 3 No. landmark foot and cycle bridges; street furniture, lighting, cycle stands, interpretation boards and CCTV; fencing and gates; limited car parking to provide disabled access to greenway and rationalisation of car parking at Holywood Arches and installation of weir infrastructure at entrance to Victoria Park- an extension to the time period for the preparation of baseline surveys and an ecological management plan for the Connswater community greenway.

Address: Lands extending from Victoria Pk to Cregagh Glen inc. parts of Cregagh Rd, Castlereagh College, Loop River Pk, Castlereagh Rd, Beersbridge Rd, Newtownards Rd, Sydenham Bypass, & lands in between. Also inc. lands extending from Beersbridge Rd to C

Decision:

Decision Date: 28.10.2008

Ref ID: LA04/2016/1128/PAN

Proposal: New classroom extension and refurbishment of Elmgrove Primary School.

Address: Elmgrove Primary School, Avoniel Road, Belfast, BT3 9BT,

Decision: PANCON Decision Date:

## Ref ID: LA04/2016/0714/PAN

Proposal: New classroom extension and refurbishment of Avoniel listed Primary School to include three blocks perpendicular to the existing. A new replacement double classroom nursery building is situated in the south-east corner of the site. A new access onto Avoniel Road is proposed along with an amended car park and proposed internal road layout.

Address: Avoniel Road, located off Avoniel Road, Belfast, BT3 9BT with road access from Avoniel Road and Avoniel Drive.,

Decision: PANACC Decision Date:

Ref ID: Z/2006/1142/LB

Proposal: Demolition of existing nursery school, kitchen, dining facility and assembly hall. Refurbishment of existing school including extensions, alterations and two storey classroom extension. Erection of detached nursery school with hard and soft play area, car parking, vehicular and pedestrian access.

Address: Avoniel Primary School, Avoniel Road, Belfast, BT5 4SE

Decision:

Decision Date: 12.03.2009

Ref ID: Z/2006/1141/O

Proposal: Refurbish and extend the existing school buildings following demolition of dining/kitchen, assembly hall and nursery unit. New nursery unit and hard and soft play areas plus new vehicular access and parking

Address: Avoniel Primary School, Avoniel Road, Belfast, BT5 4SF

Decision: Withdrawn
Decision Date: 12.03.2009

#### Ref ID: LA04/2015/0636/PAD

Proposal: New classroom extension and refurbishment of Elmgrove Primary School, Avoniel Road site, to include a two storey rear extension linked to rear of existing school building, glazed link to north side leading to new dining and multipurpose hall. Replacement double classroom nursery. New access and amended car parking, ancillary stores and landscaping. Temporary classroom accommodation.

Address: Avoniel Primary School, Avoniel Road, Belfast, BT5 4SF,

Decision:
Decision Date:

Ref ID: LA04/2016/0364/PAD

Proposal: New classroom extension and refurbishment of Avoniel Primary School.

Address: Avoniel Road, Belfast, BT5 4SF,

Decision:
Decision Date:

# **Drawing Numbers and Title**

01, 06A, 07A, 10A, 11, 12A, 14A, 17, 18, 19,20, 21, 22, 23, 24, 25, 26, 27

## Notification to Department (if relevant)

Date of Notification to Department:

Response of Department: