



Committee Report

Planning Committee South - 26 October 2021

Application no DC/21/1549/FUL

Location

7 Sea Road
Felixstowe
Suffolk
IP11 2AU

Expiry date 3 June 2021
Application type Full Application
Applicant Sea Road Developments

Parish Felixstowe

Proposal Conversion of ground floor commercial unit to provide new homes, including minor ground floor infill

Case Officer Grant Heal
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1. Summary

- 1.1. Full planning permission is sought for the conversion of a vacant ground floor commercial unit to provide four new market dwellings, including minor infilling works, at no.7 Sea Road, Felixstowe.
- 1.2. Considered against all relevant material planning matters, the application is deemed sustainable and therefore recommended for approval in accordance with the NPPF, the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant policies of the adopted development plan.
- 1.3. Notwithstanding, the referral process was triggered in accordance with the Council's scheme of delegation because the 'minded to' decision of the Planning Officer is contrary to the Town Council's recommendation to refuse the application.
- 1.4. The application was therefore presented to the referral panel on Tuesday 12 October 2021, where the application was referred to Planning Committee on the basis of the

planning history of the site and it was felt that the planning issues should be debated at planning committee.

2. Site description

- 2.1. The site is that of a former nightclub since redeveloped to provide a mixed-use scheme comprising 22 occupied flats and a vacant commercial ground-floor unit.
- 2.2. The four-storey building with additional units within the roofspace. It is constructed of red brick and prominently positioned on the corner of Granville Road and Sea Road. Existing flats are evident on all floors, including the ground floor.
- 2.3. The site lies within the Felixstowe (South) Conservation Area. The Felixstowe South Conservation Area Appraisal (2009) described the former building as follows:

'Vacant building - two three-storeys blocks originally separate now linked with flat-roofed modern narrow infill - two-storey projecting wide rectangular bays to Sea Road - rendered bays and white painted brick to main blocks - hipped slate roofs with red clay hips and ridges, shallow pitch, chimney stubs only - windows and doors boarded up but originals may survive underneath as one is visible to upper floor - one block forms half of No.8 see below) - painted brick and continuous roof across bay supported on bracket and upper floor level - new external staircase and projecting columned porch to entrance - set back with front boundary in replacement mild steel panel railings - Granville Road elevation also three storeys with hipped roof stepping down to two storeys then one - side entrance and columned porch similar to main entrance. This building's vacancy and current appearance is a major blight on Sea Road and the conservation area. It occupies a substantial plot. Although no longer sharing key characteristic features of the area the building makes a useful contribution to the area by virtue of its scale and traditional features and appearance which could be successfully recovered in a future scheme of refurbishment'.

- 2.4. The site is also located within an area at medium risk from tidal flooding (Flood Zone 2).

Planning history:

- 2.5. The site has been the subject of the following relevant applications
 - DC/21/0050/FUL: To add and additional single unit on the 4th floor within the existing roof space. Also to include a single window and 3 no roof lights. All changes are outlined in red on the listed numbers below. All services and utilities exist at 7 North Sea Road, Felixstowe - Permitted 26 March 2021;
 - DC/18/3478/VOC: Variation of condition 2 of application - DC/15/0151/FUL - Demolition of vacant nightclub premises and the erection of new building with commercial floorspace on the ground floor and 21 self-contained flats over at North Sea Hotel, 7 Sea Road, Felixstowe - permitted 23 September 2019;
 - DC/18/0012/VOC: Application to vary condition 2 of DC/15/0151/FUL (Erection of new building, part commercial/part residential) to allow alterations to the design of the ground and first floor to enable parts of the existing building to remain at North Sea Hotel, 7 Sea Road, Felixstowe - permitted 5 February 2018;
 - DC/16/0917/VOC: Application to vary Condition 2 of DC/15/0151/FUL to allow for the design of the ground floor to be altered to include two additional flats, under croft

parking and revised floor plans at North Sea Hotel, 7 Sea Road, Felixstowe - permitted 3 May 2016;

- DC/15/0151/FUL: Demolition of vacant nightclub premises and the erection of new building with commercial floor space on the ground floor and 21 self-contained flats over at North Sea Hotel, 7 Sea Road, Felixstowe - permitted 8 July 2015.

3. Proposal

- 3.1. Full planning permission is sought for the conversion of a vacant ground floor commercial unit to provide four new market dwellings, including minor infilling works, at no.7 Sea Road, Felixstowe.
- 3.2. The proposal would result in the creation of two two-bedroom and two one-bedroom flats.
- 3.3. Works include the infilling of an existing ground floor undercroft parking area which would result in an overall reduction of two vehicle parking spaces.

4. Consultations/comments

- 4.1. One third-party representation of objection has been received noting a preference for the existing ground floor commercial unit to be retained for the vitality of the sea front.
- 4.2. One neutral third-party representation has been received noting that the subject unit's conversion to residential would have little impact on the character and appearance of the Felixstowe Conservation Area.

Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Felixstowe Town Council	28 May 2021	10 June 2021

Comments submitted 26th April 2021:

"Tourism activity in Felixstowe has expanded year on year for over a decade and is likely to grow further. Recent investment and enhancement of this area has demonstrated that there is a wide market for commercial and resort uses. We believe that this proposal is in fundamental contravention of SCLP 12.14 and request that the applicant work with Felixstowe Forward, East Suffolk Council's Economic Development team and the Felixstowe BID to develop a broad marketing strategy prior to any conclusions being drawn over potential unviability."

Comments received 10 June 2021:

"Felixstowe Town Council recommends REFUSAL. We would repeat the comments made in respect of this application in April and draw attention to the popular and thriving Felixstowe tourist economy which has seen additional recent investment and is set to further expand post Covid-19. There appears to be no evidence to show that the applicant has sought advice from ESC's Economic Develop team for specific and appropriate marketing of this site."

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Statutory consultees

Consultee	Date consulted	Date reply received
SCC Highways Department	28 May 2021	23 June 2021
Summary of comments: Recommend conditions.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	28 May 2021	No response
Summary of comments: No comment.		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	28 May 2021	No response
Summary of comments: No comment received.		

Non statutory consultees

Consultee	Date consulted	Date reply received
East Suffolk Economic Development	27 September 2021	Multiple dates

Summary of comments:

- Concerns initially raised regarding the loss of commercial floor space;
- Abnormal marketing conditions resulting from the uncertainties of Brexit and the Covid-19 have affected the developer's ability to find suitable occupants;
- The marketing strategy undertaken by the applicant is sufficiently robust and comprehensive in its scope;
- It would be unfair to penalise the applicant for the unforeseen implications of volatile market conditions;
- The applicant has done all the Council could reasonably expect to market the property for the permitted commercial use.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	9 April 2021	14 April 2021

Summary of comments:
No comment.

Consultee	Date consulted	Date reply received
East Suffolk Ecology	9 April 2021	No response
Summary of comments: No comment received.		

Publicity

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Conservation Area	15 April 2021	7 May 2021	East Anglian Daily Times

Site notices

General Site Notice
Reason for site notice: Conservation Area
Date posted: 23 April 2021
Expiry date: 17 May 2021

5. Planning policy

National Planning Policy Framework 2021

SCLP3.3 - Settlement Boundaries (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP3.2 - Settlement Hierarchy (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP12.2 - Strategy for Felixstowe (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP12.14 - Spa Pavilion to Manor End (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.9 - Development in Town Centres (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.12 - District and Local Centres and Local Shops (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.4 - Protection of Employment Premises (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP5.7 - Infill and Garden Development (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.1 - Design Quality (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.3 - Historic Environment (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.5 - Conservation Areas (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.2 - Residential Amenity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP7.1 - Sustainable Transport (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP7.2 - Parking Proposals and Standards (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP9.5 - Flood Risk (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.1 - Biodiversity and Geodiversity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.2 - Visitor Management of European Sites (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

6. Planning considerations

Planning principle:

- 6.1. The site falls within the 'Settlement Boundary' (SCLP3.3) of Felixstowe, which is categorised as a 'Major Centre' within the 'Settlement Hierarchy' (SCLP3.2) of the adopted development plan.
- 6.2. With relevance to the proposal, SCLP12.2 (Strategy for Felixstowe) seeks to ensure that 'residential opportunities are provided to meet the needs in particular of younger people entering the housing market and those of an ageing population and changing demographic over the plan period'. It also seeks to ensure that 'the rich built heritage is maintained, and measures are introduced to enhance the two Conservation Areas in the town'.
- 6.3. The site also falls within the area designation policy SCLP12.14 (Spa Pavilion to Manor End) which, amongst other things, notes that 'resort related uses will be supported on the Sea Road frontage...Where this is not possible or unviable there may be opportunities for residential units on upper floor or at the rear of sites'.
- 6.4. The original planning permission (DC/15/0151/FUL) and subsequent variation of conditions applications granted flexibility in the commercial use of the subject building's ground floor.

The Case Officer can find no evidence of any specific planning Use Class restrictions included within any planning conditions attached to these consents.

- 6.5. Notwithstanding, it is considered likely that, given the site's location and surroundings, the commercial uses envisaged would have likely fallen within into the current Class E (commercial, business and service) Uses. Such uses includes - inter alia - convenience shops, restaurants, cafes, offices, leisure etc. as the most likely occupiers.
- 6.6. The site falls outside Felixstowe Town Centre (SCLP4.9: Development in town centres) and is not considered to represent part of a District of Local Centre (SCLP4.12: District and Local Centres and Local Shops).
- 6.7. Policy SCLP4.4 (Protection of Employment Premises) requires marketing evidence to change the use of established 'B Class Uses' and notes that proposals for changes of employment premises to residential use will be permitted where there is no current long-term need for the premises and the site is within the defined settlement boundary.
- 6.8. The former Class B1 (Business) Use has since been reclassified as Class E Use. Therefore, the following policy wording is considered to remain applicable to this proposal:

'Employment premises across the plan area will be protected for their established B class uses unless:

- a) Marketing evidence is provided which demonstrates that the premises have been marketed for a sustained period of 12 months in accordance with the requirements set out in Appendix E;
- b) There would be substantial planning benefit in permitting alternative uses; and
- c) The proposed use is compatible with the surrounding uses in terms of car parking, access, noise, odour and other amenity concerns.

Proposals for loss of employment premises to be used for residential use will only be permitted in exceptional circumstances where there is no current or long term need for the premises and the site is within the defined Settlement Boundary'.

- 6.9. The ground floor of the subject building has never been occupied in a commercial function but has been marketed for commercial uses for a sustained period since October 2019, as document within the submitted Marketing Report (February 2021) and subsequent addendum (September 2021) completed by Kearney Bell (Commercial Property Consultants).
- 6.10. In consultation with the Council's Economic Development Team, concerns were initially raised regarding the loss of commercial floor space that would result from this application. Abnormal marketing conditions resulting from the uncertainties of Brexit and the Covid-19 pandemic were also cited as affecting the developer's ability to find suitable occupants. Nevertheless, it is accepted that the marketing strategy undertaken by the applicant is sufficiently robust and comprehensive in its scope. It would therefore be unfair to penalise the applicant for the unforeseen implications of volatile market conditions; which by their very nature remain in a constant state of flux.
- 6.11. Given that the applicant had completed approx. 22 months of sustained marketing at the time of the most recent report addendum's receipt, it is found that the applicant have satisfactorily fulfilled the marketing requirement of Policy SCLP4.4.

- 6.12. Further, it is noted that similar convenience offerings are already present nearby within both the Undercliff Road West district centre and those adjacent the existing leisure centre and pier. Given that the predominant use of properties along this stretch of Sea Road (i.e. between Granville Road and Cavendish Road) is residential and that the site currently represents dead frontage in an area already well served by local services and facilities, the proposal site's change to residential use is compelling and would be fully congruent with neighbouring uses.
- 6.13. Importantly, the proposal would not undermine the community's ability to meet its day-to-day needs, as advocated by the NPPF (para.93).
- 6.14. With relevance to the proposal, policy SCLP5.7 (Infill and Garden Development) notes that infill development will be supported where, amongst other things, the design would not harm the street scene or character of the area. Sufficient parking should also be provided, and the new dwellings should not present the potential for significant harm to the amenity enjoyed by both existing and proposed residents.
- 6.15. In-line with the above assessment, it is judged that the planning principle could be considered acceptable, subject to a satisfactory assessment of other material planning matters (including those set out within SCLP5.7), as set out below.

Visual amenity and heritage:

- 6.16. The proposed works represent a logical infill development that would have an external appearance to match the existing upper storeys. The site is otherwise judged to have capacity to absorb the proposal without resulting in its overdevelopment.
- 6.17. The installation of additional frontage windows and the infilling of the rear undercroft area would have a low impact on the building's overall aesthetic. Indeed, it would have a neutral impact on the building's overall contribution to the character of the Felixstowe Conservation area. A matching palette of materials would also ensure a sympathetic and well-integrated approach.
- 6.18. As such, the proposal is judged to accord with the provisions of the NPPF, the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as policies SCLP5.7, SCLP12.2, SCLP11.1 (Design quality), SCLP11.3 (Historic environment) and SCLP11.5 (Conservation Areas) of the adopted Local Plan.

Highway safety and parking:

- 6.19. In consultation with Suffolk County Council Highway Authority, it is considered that the proposed overall reduction in vehicle parking spaces (from six to eight) is unlikely to result in any serious impact on highway safety as there is sufficient parking available in the immediate area.
- 6.20. The site is sustainably located close to Felixstowe town centre and seaside resort where there are a number of dedicated public car parks and good access to alternative modes of transport, including a bus and train station. On-street parking is also available within the streets surrounding the development.

6.21. The nature of the proposal is otherwise unlikely to present the potential to impact negatively upon existing highway safety, when judged against the provisions of the NPPF and policies SCLP7.1 (Sustainable Transport) and SCLP7.2 (Parking proposals and Standards) of the adopted development plan.

Flood risk:

- 6.22. The proposal site lies within Flood Zone 2 (tidal flooding) and therefore the new dwellings would be at 'medium' risk of flooding. The Environment Agencies standing advice refers to residential development as 'more vulnerable'. The Council's Strategic Flood Risk Assessment and Coastal Management Plan for Felixstowe is to 'hold the line' and maintain the existing flood defences.
- 6.23. SCLP9.5 (Flood Risk) notes that single storey residential developments will not be permitted in areas of high risk of flooding within or outside Settlement Boundaries. The proposed development would be within an area of 'medium' risk from flooding.
- 6.24. A full site-specific Flood Risk Assessment and Flood Management Plan has been received in accordance with the provisions the NPPF or policy SCLP9.5 (Flood Risk) of the adopted development plan. In addition, a document outlining Flood Resilience Measures to be incorporated as part of the proposal's construction has also been provided.
- 6.25. The submitted information demonstrates that the flood risks are principally associated with a potential 'breach/overtopping' event which could occur in the event of a tidal surge temporarily raising sea levels above the height of existing sea defences (including the promenade and boundary sea walls evident on the opposite side of Sea Road).
- 6.26. The Flood Risk Assessment sets out that in a 1 in 200 year plus climate change event, flood water could overtop the existing defences (reaching 5.1 Above Ordnance Datum (AOD) level). During a 1 in 1000 year plus climate change event, the flood level is expected to reach 5.32m AOD.
- 6.27. More recent information obtained from the Environment Agency demonstrates that the severity of an overtopping event could be reduced to 4.93m and 5.30 respectively. Nevertheless, the proposed internal finished floor levels would be 4.15m and, as such, a suite of flood resilience and management measures are proposed, including the adoption of specific construction methods and practices to mitigate impacts.
- 6.28. A written flood response plan has also provided to ensure that contingency measures are in place to maximise safety for future occupants. Importantly, residents will have access to shared upper storey levels of the building in the event of an overtopping event. It is also demonstrated that the proposal would be unlikely to result in any meaningful increase in flood risk elsewhere.
- 6.29. Concerning national and local policy requirements to undertake a sequential test to assess and compare alternative sites at lower risk from flooding, published guidance from the Environment Agency states that one is not required if either of the following apply:
- The development is a minor development;
 - The development involves a change of use (e.g. from commercial to residential).

- 6.30. In this regard, the proposal is judged to represent both a minor development and change of use. Therefore, the sequential test is not relevant to this application.
- 6.31. With the above in-mind, it is considered that with the requirements of proposed flood resilience and management measures secured through appropriately worded planning conditions, the application could fulfil the relevant policy requirements. It is also noted that part of the subject building's existing ground floor is also already occupied as dwellings which benefit from similar measures similar to those proposed herein.

Residential amenity:

- 6.32. Given the ground floor siting of the proposed dwellings and the long-established residential use of neighbouring properties, it is considered unlikely that the proposed application presents the scope to undermine the relevant provisions of the NPPF and SCLP11.2 (Residential amenity) of the adopted Local Plan.

Affordable housing:

- 6.33. With consideration as to whether the cumulative number of dwellings previously permitted in addition to that sought by this application would attract an affordable housing contribution, it is calculated that the affordable requirement for a scheme of 26 units would result in a requirement for eight affordable dwellings (as 33% rounded down). This represents an increase of one additional affordable dwelling – or commuted sum equivalent - over the seven affordable dwellings originally attributed to the scheme of 21 dwellings permitted by DC/15/0151/FUL.
- 6.34. However, since the adoption of Policy SCLP5.10 (Affordable Housing on Residential Developments), the requirement for affordable housing does not apply to developments which are solely brownfield flatted schemes. Given that the development sought by this proposal would, if approved, result in a development of only flats on brownfield land, no further affordable housing contribution is therefore required.

Contributions:

- 6.35. In addition to the proposed creation of a new dwelling being liable for contributions attributed to the Council's Community Infrastructure Levy (CIL), it is noted that the site is situated within the 13km protection zone of European Designated Sites, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).
- 6.36. The strategy, which aligns with policies SCLP10.1 (Biodiversity and geodiversity) and SCLP10.2 (Visitor Management of European Sites) seek to support Article 6(3) of the Habitats Directive and requires certain developments, including new dwellings that could have a direct or indirect adverse effect on the integrity of internationally and nationally designated areas to mitigate and, where appropriate, compensate in order to reduce net impacts of the development to a level below that which would outweigh the benefits of development.
- 6.37. As such, East Suffolk Council are obliged to seek a proportionate financial contribution in relation to the proposed new dwellings, which would be sited within Zone A of the adopted charging schedule.

- 6.38. With the above in mind, it is confirmed that a payment of £121.89 per dwelling (£487.56) has been received along with the appropriate payment forms. The Planning Officer has also undertaken the necessary appropriate assessment.

7. Conclusion

- 7.1. Whilst, it is unfortunate that the commercial units have remained vacant since their construction, they have been appropriately marketed with no uptake for occupation. This scheme would utilise the empty units to provide additional dwellings, and as per the above assessment, this application accords with the NPPF, the Planning (Listed Buildings and Conservation Areas) Act 1990 and all relevant policies of the adopted development plan. The scheme is therefore acceptable and should be supported.

8. Recommendation

- 8.1. The application is therefore recommended for approval subject to conditions.

Conditions:

1. The development hereby permitted shall be begun not later than the expiration of three years from the date of this permission.

Reason: This condition is imposed in accordance with Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall not be carried out other than in complete accordance with the following approved drawing(s):
 - 200 (OS Map and Site Plan);
 - 300 (Existing Floor Plans);
 - 301 (Existing Section and Elevations);
 - 302 (Proposed Site Layout Plan);
 - 303 (Proposed Floor Plans);
 - 304 (Proposed Section and Elevations).

Reason: For avoidance of doubt as to what has been considered and approved.

3. The materials and finishes shall be as indicated within the submitted application and thereafter retained as such, unless otherwise agreed by the local planning authority.

Reason: To ensure the satisfactory appearance of the development in the interests of visual amenity.

4. The working hours in connection with the construction of the hereby approved dwelling shall not be other than between 07:30 and 18:00 Monday to Saturday; and no work shall be carried out on Sundays, or Bank Holidays, or outside the specified hours, unless otherwise agreed by the Local Planning Authority.

Reason: In the interest of protecting the amenity of existing residents and the local environment.

5. The areas to be provided for parking and storage of Refuse/Recycling bins as shown on the approved drawings shall be provided in their entirety before the development is brought into use and shall be retained thereafter for no other purpose unless otherwise agreed by the Local Planning Authority.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

6. The hereby approved development shall be constructed in accordance with the 'Flood Resilient Construction Techniques' as set out within the supporting document received 29 March 2021.

Reason: In the interest of safeguarding residents and the local environment.

7. The development shall be implemented in accordance with the 'Drainage Strategy' as set out within the supporting document received 29 March 2021.

Reason: To prevent an increase in the risk of flooding to the proposed development and elsewhere, and ensure a suitable approach is adopted for the management of surface water.

8. Prior to first use of the hereby approved development, the occupants of each dwelling shall be issued with a copy of the 'Flood Management Plan' received 29 March 2021.

Reason: In the interest of safeguarding residents and the local environment.

Informatives:

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.
2. East Suffolk Council is a Community Infrastructure Levy (CIL) Charging Authority.

The proposed development referred to in this planning permission may be chargeable development liable to pay Community Infrastructure Levy (CIL) under Part 11 of the Planning Act 2008 and the CIL Regulations 2010 (as amended).

If your development is for the erection of a new building, annex or extension or the change of use of a building over 100sqm in internal area or the creation of a new dwelling, holiday let of any size or convenience retail, your development may be liable to pay CIL and you must submit a CIL Form 2 (Assumption of Liability) and CIL Form 1 (CIL Questions) form as soon as possible to CIL@eastsoffolk.gov.uk

A CIL commencement Notice (CIL Form 6) must be submitted at least 24 hours prior to the commencement date. The consequences of not submitting CIL Forms can result in the loss of payment by instalments, surcharges and other CIL enforcement action.

CIL forms can be downloaded direct from the planning portal:

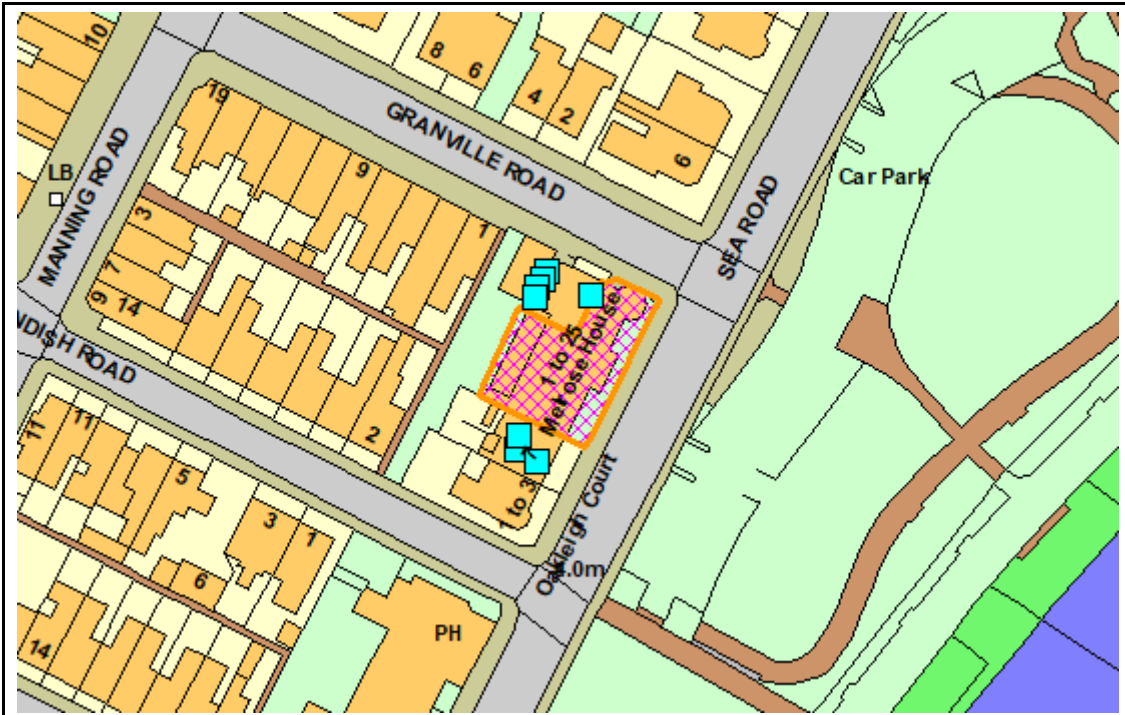
https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5

Guidance is viewable at: <https://www.gov.uk/guidance/community-infrastructure-levy>

Background information

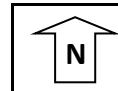
See application reference DC/21/1549/FUL on [Public Access](#)

Map



DO NOT SCALE SLA100019684

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Key



Notified, no comments received



Objection



Representation



Support