KIRKLEES METROPOLITAN COUNCIL
INVESTMENT & REGENERATION SERVICE

DEVELOPMENT MANAGEMENT

Town and Country Planning Act 1990 (as amended) – SECTION 70

DELEGATED DECISION TO DETERMINE PLANNING APPLICATIONS

Reference No:	**2021/62/93410/W**
Site Address:	32, Talbot Avenue, Edgerton, Huddersfield, HD3 3BG
Description:	Partial demolition, erection of single storey rear extension and external alterations (Listed Building within a Conservation Area)
Recommending Officer:	Sam Jackman

DECISION – CONDITIONAL FULL PERMISSION

I hereby authorise the approval of this application for the reasons set out in the officer's report and recommendation annexed below in respect of the above matter.

John Holmes

AUTHORISED OFFICER

Date: 21-Jan-2022

SITE DESCRIPTION – Planning 2021/93410

Ridgemount, 32 Talbot Avenue, Edgerton is a substantial detached dwelling, located in the Edgerton Conservation Area and is a grade-II Listed Building.

The property itself, is a substantial family home, discreetly located within the street, built of hammer-dressed stone with ashlar dressings and with a pitched stone slate roof, exhibiting examples of the arts and crafts style both externally and internally. The asymmetrical south front facing into the main garden area is read as the principal elevation, embellished by the single-storey porch with a crenelated parapet and opening to the garden. The main elevation includes two stone gables of different heights which express the main spaces (dining and master bedroom) with large mullioned and transomed windows with leaded lights in the Arts & Craft manner.

The house is located to the northern end of the site, with a stone wall enclosing the north boundary and partially abutted by a kitchen garden and outbuildings. The service areas of the house were also placed on its north-side, projecting into the garden. The whole property is surrounded by mature planting, screening it from its neighbours.

The following is the listing description.

> *Ridgemount was built in 1922-3 by Joseph Berry & Sons, Architects, for Ralph Murgatroyd. Joseph Berry was an admirer of Edgar Wood who built the adjacent Briarcourt (Listed Grade II). Hammer dressed stone. Ashlar dressings. Pitched stone slate roof. 2 storeys. Some gables, coped and linked by low parapet. Mullioned and transomed windows, chamfered. Broad canted bay at east end. Parapeted. Porch with crenelated parapet and door with cornices, leaded lights and ornamental Arts and Crafts cast iron hinges. Various Arts and Crafts rainwater heads and junction boxes with embossed ornament. Interior. Hall has Jacobethan wainscotting and moulded plaster ceiling with arabesque ornament. Main south-east room has more elaborate wainscotting, with ornamented panelled pilasters, dentilled cornice, and many panels carved with arabesque ornament: chimneypiece flanked by Tuscan colonnettes, and overmantel with applied Ionic balusters:*

particularly elaborate brass fingerplates and spirally fluted door handles.

DESCRIPTION OF PROPOSAL

The proposal is for a single storey rear extension, to create a large open plan kitchen/living/dining area.

The proposed extension would project approx. 4m to the rear with a max width of 5.2m with the eaves at 3.3m and the overall height at 6m. The proposal will involve removing the rear store and the back corner of the property along with the external steps leading to the cellar which will be filled in.

The internal walls between the existing kitchen, utility and store will also be removed with a new larger utility created.

The extension would be built from materials to match the host property using stone with a stone slate roof, aluminium windows are proposed.

https://www.kirklees.gov.uk/beta/planning-applications/search-for-planning-applications/detail.aspx?id=2021%2F93410

HISTORY OF NEGOTIATIONS/AMENDMENTS RECEIVED

The original plans showed a very large rear extension to create an open plan living area with 3 large oak framed gables and 3 sets of bi-fold doors. To create a room approx. 8.5m by 13.5m, incorporating a new utility/ store. A new small dormer within the extension to provide an en-suite to bedroom 3.

Amended plans have been received to address concerns raised by the Conservation Area office and the twentieth century society.

Further clarification has been requested with regards the steps under the rear storeroom and cellar.

The pre-commencement condition and discharge of conditions has been agreed by the agent.

RELEVANT HISTORY

2021/93411 – Listed Building Consent application – Current

https://www.kirklees.gov.uk/beta/planning-applications/search-for-planning-applications/detail.aspx?id=2021%2F93411

PUBLIC/MEMBERS RESPONSE

We are currently undertaking statutory publicity requirements, as set out at Table 1 in the Kirklees Development Management Charter.

As such, we have publicised this application via neighbour notification letters, press advert and site notice which expired on the 15 Oct 2021, whereby no representations have been received.

The amended plans were considered to have a reduced impact on neighbours than the original submission and as such were not publicised on the basis it was considered the plans as advertised adequately alerted the public to the nature of the proposed development.

CONSULTATION RESPONSES

> **K.C. Conservation & Design –** Following receipt of amended plans, no objections raised, however, requested clarification on cellar steps and suggested conditions.
>
> **English Heritage –** On the basis of the information available to date, confirm they do not wish to offer any comments. They suggest that the LPA seek the views of their specialist conservation adviser.
>
> **Twentieth Century Society** – Objections raised

Twentieth Century Society have not been notified with regards to the amended plans, given that the scheme has been reduced in scale to a more modest extension.

POLICY

The site is unallocated on the Kirklees Local Plan and is a grade ll Listed Building within Edgerton Conservation Area

Kirklees Local Plan (LP):

- LP 1– Achieving sustainable development
- LP 2 – Place shaping
- LP 22 - Parking
- LP 24 – Design
- LP 30 - Biodiversity and geodiversity
- LP 33 - Trees
- LP 35 – Historic environment

National Policies and Guidance:
National planning policy and guidance is set out in National Policy Statements, primarily the National Planning Policy Framework (NPPF) published 21st July 2021, together with Circulars, Parliamentary Statements and associated technical guidance

The NPPF constitutes guidance for local planning authorities and is a material consideration in determining applications.

- Chapter 2 – Achieving sustainable development
- Chapter 12 – Achieving well-designed places
- Chapter 14 – Meeting the challenge of climate change, flooding & coastal change.
- Chapter 15 – Conserving and enhancing the natural environment
- Chapter 16 – Conserving and enhancing the historic environment

House Extensions and Alterations Supplementary Planning Guidance (SPD)

Kirklees Council has adopted supplementary planning guidance on house extensions which now carries full weight in decision making. This guidance indicates how the Council will usually interpret its policies regarding such built development, although the general thrust of the advice is aligned with both the Kirklees Local Plan (KLP) and the National Planning Policy Framework (NPPF), requiring development to be considerate in terms of the character of the host property and the wider street scene. As such, it is anticipated that this SPD will assist with ensuring enhanced consistency in both approach and outcomes relating to house extensions.

Legislation

The Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory Development Plan for Kirklees is the Local Plan (adopted 27th February 2019).

ASSESSMENT

Principle of development:

The site is without notation on the Kirklees Local Plan. Chapter 2 of the NPPF introduces the presumption in favour of sustainable development, which is enshrined in policy LP1 of the Kirklees Local Plan. This policy stipulates those proposals that accord with policies in the Kirklees Local Plan will be approved without delay unless material considerations indicate otherwise.

> Policy LP2 sets out that all development proposals should seek to build on the strengths, opportunities and help address challenges identified in the Local Plan. Policy LP24 of the KLP is relevant and states that “good design should be at the core of all proposals in the district”.

Policy LP24 states that proposals should promote good design by ensuring:

"a. the form, scale, layout and details of all development respects and enhances the character of the townscape…" and "*c. extensions are subservient to the original building, are in keeping with the existing buildings in terms of scale, materials and details..."*

The site is designated within Edgerton Conservation Area and is a grade ll Listed Building. Policy LP35 requires that proposals should retain those elements of the historic environment which contribute to the distinct identity of the Kirklees area and ensure they are appropriately conserved, to the extent warranted by their significance, also having regard to the wider benefits of development. Consideration should be given to the need to ensure that the proposals maintain and reinforce local distinctiveness and conserve the significance of designated and non-designated heritage assets.

In terms of national planning Policy Chapter 16 of the NPPF needs to be considered which in paragraph 199 states: "*When considering the impact of a proposed development on the significance of a designated heritage asset,* in this case the Edgerton Conservation Area, *great weight should be given to the asset's conservation…".* Chapter 16 further details that an assessment has to be made in relation to the level of harm and any harm may be outweighed by public benefit.

Paragraph 200 requires that 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. Paragraph 201 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act requires that the Local Planning Authority shall pay special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in discharging its planning functions. When making a recommendation in respect of a planning application affecting a Listed Building or its setting, attention must be given to Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires the Local Planning Authority to 'have special regard to the desirability of preserving the building or its setting or any features of a special architectural or historic interest which it possesses'.

The newly adopted Kirklees Supplementary Planning Document on House Extensions (SPD) which come into effect on 29th June 2021 and attracts weight as a material consideration.

With regards to the SPD, Key Design Principles 1 and 2 are relevant which state:

- Principle 1 – that “extensions and alterations to residential properties should be in keeping with the appearance, scale, design, and local character of the area and the street scene.”

- Principle 2 – that “extensions should not dominate or be larger than the original house and should be in keeping with the existing building in terms of scale, materials and detail.”

In Section 5.1 followed by 5.2 of the Supplementary Planning Document refers to the general rules, where a rear extension should:

- Preserving a back garden of a reasonable size, with a general principle that at least half the garden area is retained;
- Being set behind the original building, and not projecting beyond the sides; and
- Maintaining external access to the rear garden.

- respect the original house and garden in terms of its size and scale;
- use appropriate materials which match or are similar in appearance to the original house; and
- not have an adverse impact by way of overshadowing or loss of outlook of neighbouring properties.

In Section 5.6 of the Supplementary Planning Document which specifically refers to single storey rear extension which should:

- be in keeping with the scale and style of the original house
- not normally cover more than half the total area around the original house (including previous extensions and outbuildings);
- not exceed 4 metres in height; not project out more than 3 metres from the rear wall of the original house for semi-detached and terraces houses or by 4 metres for detached properties;
- where they exceed 3m in length the eaves height should generally not exceed 2.5 meters; and
- retain a gap of at least 1 metre from a property boundary, such as a wall, fence or hedge.

Principles 1, 2 and sections 5.1, 5.2 & 5.6 are relevant to the consideration of the principle of the development, visual amenity and residential amenity and are considered within the following report.

In this case the principle of a rear extension is considered to be acceptable and shall be assessed against other material planning considerations below.

An allied Listed Building application has been submitted under application 2021/93411, which specifically assess the impact of the development on a variety of other material planning considerations.

Impact on visual amenity and Listed Building:

The property is a grade ll Listed Building and within Edgerton Conservation Area the impact of the development, in addition to the aforementioned local plan policies, will need to be assessed against national policy in Chapter 16 of the NPPF and the general duty in Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which states that “in the exercise of (of planning functions), with respect to any buildings or other land in a conservation area…special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.

The house was built in 1922-3 to the designs of Joseph Berry & Sons, Architects. Joseph Berry is recorded as being an admirer of Edgar Wood who built the adjacent dwelling completed in 1896, known as Briarcourt (also listed grade-II).

Ridgemount was built on a parcel of land formed from the sale in 1921 of Briarcourt, along with adjoining parcels of land. The 1.8 acre square plot on which Ridgemount was built, was defined by the mid-C19th field boundary lines (marked as a cricket ground in 1907). The inter-war development resulted in the square plot being divided in two (retaining the northern boundary) with the eastern plot (comprising one acre) acquired by Ralph Murgatroyd who commissioned Berry to design his house which was completed in early 1923.

The plan form of Ridgemount is understood to retain the characteristics of a late-C19th affluent, family dwelling, adapted to the circumstances of the smaller site. Consequently, the house was located to the northern end of the site, with a stone wall enclosing the north boundary and partially abutted by a kitchen garden and outbuildings. The service areas of the house were also placed on its north-side, projecting into the garden. This allowed the main living and family rooms to be orientated towards the south, aligned across the frontage and the substantial main garden.

The property itself, is substantial and discreetly located within the street, built of hammer-dressed stone with ashlar dressings and a pitched stone slate roof, exhibiting examples of the arts and crafts style both externally and internally. The asymmetrical south front facing into the main garden area is read as the principal elevation, embellished by the single-storey porch with a crenelated parapet and opening to the garden. The main elevation includes two stone gables of different heights which express the main spaces (dining and master bedroom) with large mullioned and transomed windows with leaded lights in the Arts & Craft manner.

In terms of impact on the Listed Building the proposed materials are coursed natural stone and stone slates to match the existing, with metal external doors and windows. All these materials are acceptable include the metal window frames as this will allow slender frames within the stone mullions. Therefore the proposal is considered to be of acceptable materials.

The proposal, as amended, is for a rear extension to provide a flexible open plan living space with kitchen, dining and living areas with direct access out into the gardens, as well as new utilitarian areas.

The direct heritage impact of the works on the fabric would result in the demolition of a rear addition in the form of a storeroom and opening of kitchen/service walls to connect to the proposed rear addition. The physical impact would be the loss of some historic fabric in the altered service area.

Consequently, the opening of the walls and loss of original fabric in this case would have a modest, adverse impact on the building's architectural interest, as well as transforming its spatial character. Where, the proposed location of the extension would retain the architectural focus of the building from the main south frontage.

In accordance with best conservation practice, the Kirklees Local Plan and guidance in the adopted Extension and & Alterations SPD (2021) the rear extension, should be read as an ancillary component of the building and as a natural growth of the building which complements its materiality and Arts & Craft style. Where in this case the amended proposal would be smaller in scale, is single storey and would complement the host properties distinctive form and special interest.

The new window openings would reflect the existing window proportions and form with stone mullions and transom, with a central opening patio door to two of the window openings.

The Council's Conservation Team have recommended conditions that the materials of construction match that of the host property and that a sample material in relation to the roof is provided to the LPA prior to construction. It is considered reasonable and necessary to include these conditions upon any grant of permission.

Therefore, subject to condition, the proposal is concluded to be in accordance with Policies LP24 & LP35 of the Kirklees Local Plan, principles 1 and 2 of the House Extensions and Alterations SPD along with paragraphs 195, 197 and 201 of the National Planning Policy Framework and the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Impact on residential amenity:

Policy LP24 of the Kirklees Local Plan and advice within Chapter 12 of the National Planning Policy Framework seeks to ensure development has an acceptable impact upon the amenity of neighbouring occupiers. Key Design Principles 3, 5 and 6 of the Council's adopted House Extensions & Alterations SPD seek to ensure development does not have a detrimental impact upon privacy of neighbouring occupiers, cause unacceptable levels of overshadowing or be unacceptably oppressive / overbearing

In this case the nearest neighbour is over 30m away from the extension with the additional mature planting to all boundaries. Therefore, it is considered there will be no impact on neighbouring properties with regards to the amended plans, in terms of overshadowing, overbearing or overlooking as the proposal is at an acceptable distance from the neighbouring properties.

Having considered the above factors affecting neighbouring properties and relevant policies, the proposed extension is not deemed to result in any significant harm upon the residential amenity.

The proposal therefore accords with policies LP1, LP2 & LP24 of the Kirklees Local Plan which states "extensions…minimise impact on residential amenity of future and neighbouring occupiers", Principles 3, 5 and 6 of the Council's adopted House Extensions & Alterations SPD as well as policies within chapter 12 of the National Planning Policy Framework.

Impact on highway safety:

Policy LP22 of the Kirklees Local Plan, and Key Design Principle 15 of the adopted House Extensions & Alterations SPD seek to ensure acceptable levels of off-street parking are retained are also considered to be of relevance.

In this case the parking arrangement is unchanged and spaces for 4 four cars can easily be achieved.

It is therefore concluded the proposal meets the aims of Policy LP22 of the Kirklees Local Plan with respect to highway safety and advice in Chapter 12 of the National Planning Policy Framework.

Other matters:

K.C. Conservation & Design – Their comments to the original proposal are detailed as follows:-

> *In accordance with best conservation practice, the Kirklees Local Plan and guidance in the adopted Extension and & Alterations SPD (2021) the rear extension should be read as an ancillary component of the building and as a natural growth of the building which complements its materiality and Arts & Craft style. Unfortunately, the disproportionate scale and contrasting architectural design of the proposed extension would be a transformative feature which would physically and visually dominate the rear of the building rather than complementing its distinctive form and special interest.*
>
> *The proposal consequently fails to meet the requirements of S.66 of the Planning (listed Building & Conservation Act) 1990, NPPF paragraphs 199 and 202 and Kirklees Local Plan policy LP35 and is not supported for the above reasons.*

The applicants should be advised to review the architectural ambitions of the project, tailoring their spatial requirements to produce a more complementary design form, paying particular attention to the established proportions, materiality and rhythms of the existing building. The proposal should not be granted consent in its current form due to the adverse heritage impacts.

Following receipt of amended plans, no objections raised, however, requested clarification on cellar steps and suggested conditions.

Twentieth Century Society – Objections raised to the original scheme as they considered the extension to be too substantial. While technically single storey, the steeply pitched roof of the structure puts it closer to two storeys. In its current proposed form, we believe the sizeable new addition would harm the architectural interest of the Grade II listed house and its setting. While the rear of the house is more modest and restrained than the front, its massing is nevertheless well considered and its various components unified by their materials and detailing. As outlined in the NPPF, any proposals that would harm the significance of designated heritage assets need to be clearly and convincingly justified. As the house could continue to provide a dwelling without the need for such a substantial extension, we do not believe the proposal is justified. There are also little (if any) public benefits of the scheme. The Society encourages the applicant to revise the design to reduce the scale of the proposed extension and make it more sympathetic to the character of the listed building.

Twentieth Century Society has not been notified with regards to the amended plans, given that the scheme has been reduced in scale to a more modest extension and in light of the response of the Council's Conservation Team.

Climate Change - Principle 8 of the Kirklees House Extensions and Alterations SPD states that extensions and alterations should, where practicable, maximise energy efficiency. Principle 9 goes on to highlight that the use of innovative construction materials and techniques, including reclaimed and recycled materials should be used where possible. Furthermore, Principles 10 and 11 request that extensions and alterations consider the use of renewable energy and designing water retention into the proposals.

On 12th November 2019, the Council adopted a target for achieving 'net zero' carbon emissions by 2038, with an accompanying carbon budget set by the Tyndall Centre for Climate Change Research. National Planning Policy includes a requirement to promote carbon reduction and enhance resilience to climate change through the planning system and these principles have been incorporated into the formulation of Local Plan policies.

The Local Plan pre-dates the declaration of a climate emergency and the net zero carbon target, however it includes a series of policies which are used to assess the suitability of planning applications in the context of climate change. When determining planning applications, the Council will use the relevant

Local Plan policies and guidance documents to embed the climate change agenda.

Due to the size, scale and limited nature of development, it was not considered necessary to request specific measures to address the developments' resilience to climate change.

K.C. Biodiversity – Paragraphs 174, 180, 181 and 182 of Chapter 15 of the National Planning Policy Framework are relevant, together with The Conservation of Habitats and Species Regulations 2017 which protect, by law, the habitat and animals of certain species including newts, bats and badgers.

Policy LP30 of the Kirklees Local Plan requires that proposals protect Habitats and Species of Principal Importance.

Principle 12 of the Kirklees House Extensions and Alterations SPD states that extensions and alterations should consider how they might contribute towards the enhancement of the natural environment and biodiversity.

The application site is within a 'Bat Alert' layer on the Council's GIS system. Whilst formal comments have not been requested from an Ecology & Biodiversity Officer it is considered that a Bat Survey was not required in this instance.

This is due to the fact the extension would have no impact on the existing roof structure of the host property as it will but up against the existing gable to the property and the proposal is single storey.

As such the development would have little impact on bats and would be in accordance with Chapter 15 of the National Planning Policy Framework and Policy LP30 of the Kirklees Local Plan.

K.C. Trees – Chapter 15 of the NPPF seeks to conserve / protect the environment and for developments to have a net gain in terms of biodiversity. With regard to trees Policy LP33 of the Kirklees Local Plan is of relevance and states the following:-

> '*The Council will not grant planning permission for developments which directly or indirectly threaten trees or woodlands of significant amenity. Proposals should normally retain any valuable or important trees where they make a contribution to public amenity*'

There are no protected trees within the application site albeit the property is within Edgerton Conservation Area with mature trees within the garden. However, there are no trees within close proximity to the proposed extension in this case. As such the proposal would comply with policy LP33

Representations:

It should be noted that no representations have been received as a result of site publicity.

The amended plans were considered to have a reduced impact on neighbours than the original submission and as such were not publicised on the basis it was considered the plans as advertised adequately alerted the public to the nature of the proposed development.

Conclusion:

The NPPF has introduced a presumption in favour of sustainable development. The policies set out in the NPPF taken as a whole constitute the Government's view of what sustainable development means in practice.

This application has been assessed against relevant policies in the development plan and other material considerations. It is considered that the development would constitute sustainable development and is therefore recommended for approval.

Decision Authorisation - Delegated Powers

Application Number: **2021/93410**

Officer Recommendation: APPROVE

Conditions and Reasons

1. The development hereby permitted shall be begun within three years of the date of this permission.
Reason: Pursuant to the requirements of Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in complete accordance with the plans and specifications schedule listed in this decision notice, except as may be specified in the conditions attached to this permission, which shall in all cases take precedence.
Reason: For the avoidance of doubt as to what is being permitted and so as to ensure the satisfactory appearance of the development on completion, and to accord with Policies LP01, LP02 & LP35, principles 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 & 11 of the Council's adopted Supplementary Planning Document on House Extensions and Alterations and to accord with policies within chapters 2, 12, and 14 of the National Planning Policy Framework.

3. The external walls of the extension hereby approved shall in all respects match those used in the construction of the existing building and be thereafter retained.
Reason: In the interests of visual amenity and to accord with Policies LP1, LP2, LP24 & LP35 of the Kirklees Local Plan, the adopted SPD on House

Extensions and Alterations and advice within the National Planning Policy Framework.

4. The external roofing materials of the extension hereby approved shall be a pitched stone slate to match the existing roofs of the host property, a sample of which shall be submitted to and approved in writing by the Local Planning Authority before development commences. (This could photographic details with the supplier's confirmation of material type and slate dimensions). The development shall be constructed in accordance with the materials approved by this condition which shall be thereafter retained.
Reason: In the interests of visual amenity and to accord with Policies LP1, LP2, LP24 & LP35 of the Kirklees Local Plan, the adopted SPD on House Extensions and Alterations and advice within the National Planning Policy Framework.
Plans and specifications schedule: -

Plan Type	Reference	Version	Date Received
Existing location Plan 1:1250	EX0001		12TH Jan 2022
Existing site plan 1:200	EX0002		12TH Jan 2022
Existing floor layout	EX0003		12TH Jan 2022
Existing elevations & sections	EX0004		12TH Jan 2022
Proposed ground floor layout	AL0215		12TH Jan 2022
Proposed first floor layout	AL0216		12TH Jan 2022
Proposed front & side elevations	AL0220	A	12TH Jan 2022
Proposed rear & side elevations	AL0222	A	12TH Jan 2022
3D images as proposed	220 109		12TH Jan 2022
Demolition as proposed	AL0007	A	12TH Jan 2022
Schedule of works	220 112		12TH Jan 2022
Heritage Statement	210 818		12TH Jan 2022

Pursuant to article 35 (2) of the Town and Country Planning (Development Management Procedure) Order 2015 and guidance in the National Planning Policy Framework, the Local Planning Authority have, where possible, made a pre-application advice service available, complied with the Kirklees Development Management Charter 2015 and otherwise actively engaged with the applicant in dealing with the application. The Case Officer requested amended plans during the process of the application to seek an amendment which would reduce the impact of the development on the Listed Building. This decision is based on the amended/additional documents submitted.

Recommendation and Authorisation Box

Report Dated: 20.1.22

Coal – low risk