

**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:	<b>2024/62/92935/E</b>
Site Address:	33, Union Street, Dewsbury, WF13 1AS
Description:	Change of use and alterations to shops to form 4 apartments (within a Conservation Area)
Recommending Officer:	Nicole Helliwell

**DECISION - REFUSE**

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

Sarah Longbottom

***AUTHORISED OFFICER***

**Date:** 23 January 2025

## **Officer Report**

**Reference No.** 2024/62/92935/E

**Site Address:** 33, Union Street, Dewsbury, WF13 1AS

**Proposal:** Change of use and alterations to shops to form 4 apartments (within a Conservation Area).

## **Site Description**

The application site relates to 33 Union Street, a two-storey commercial property located in Dewsbury. The wider area comprises a combination of residential and commercial properties of varying materials and architectural styles. There are no Public Rights of Way (PROW) within close proximity to the site. However, the site is located within the Dewsbury Town Centre Conservation Area and close to 18, 20 and 22 Bond Street, Grade II listed buildings.

## **Description of Proposal**

The applicant is seeking planning permission for the change of use and alterations to shops to form 4 apartments. The details of the proposal are summarised below:

- The building would comprise 4 apartments; 2 one bedroom apartments and 2 two bedroom apartments
- Alterations to the existing shop front with the front and side elevation of the building
- Alterations to the first floor fenestration within the front elevation of the building

## **Relevant Planning History**

- **94/90031:** Change of use from retail to estate agents. [Planning application details | Kirklees Council](#) – Conditional Full Permission
- **93/05231:** Change of use of toy shop to estate agent's office and showroom. [Planning application details | Kirklees Council](#) – Conditional Full Permission
- **87/01810:** Change from office use to Retail Shop User for the retail sale of prams pushchairs and associated products. [Planning application details | Kirklees Council](#) – Granted Conditionally

## **Representations**

The application was publicised by site notice, press advertisement and neighbour notification letters, which expired on 7<sup>th</sup> January 2025. No representations were received following the statutory publicity.

## **Parish/Town Council Comments**

Not Applicable.

### **Local Ward Members**

Councillor Eric Firth

Please ensure there is somewhere to put waste bins if not please consider refusal.

### **Consultation Responses**

The following is a brief summary of Consultee advice (more details are contained in the 'Assessment' section of the report, where appropriate):

KC Conservation & Design – Objection

KC Environmental Health – No objection subject to recommended conditions

KC Waste Planning – No information has been submitted in relation to waste storage or presentation.

### **Planning Policy Background**

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 27<sup>th</sup> February 2019).

The site is UNALLOCATED on the Kirklees Local Plan Proposals Map, however, the site is located within the Dewsbury Town Centre Conservation Area. The most relevant policies for consideration in this case are:

- **LP 1** - Achieving Sustainable Development
- **LP 2** - Place Shaping
- **LP 7** - Efficient and Effective Use of Land and Buildings
- **LP 11** - Housing Mix and Affordable Housing
- **LP 13** - Town Centres
- **LP 20** - Sustainable Travel
- **LP 21** - Highway Safety and Access
- **LP 22** - Parking
- **LP 24** - Design
- **LP 28** - Drainage
- **LP 30** - Biodiversity & Geodiversity
- **LP 35** - Historic Environment
- **LP 51** - Protection and Improvement of Local Air Quality
- **LP 52** - Protection and Improvement of Environmental Quality
- **LP 53** - Contaminated and Unstable Land

## **National Policies and Guidance**

National planning policy and guidance is set out in National Policy Statements, primarily the National Planning Policy Framework (NPPF) updated December 2024, the Planning Practice Guidance Suite (PPGS) first launched 6th March 2014 together with Circulars, Ministerial Statements and associated technical guidance. The NPPF constitutes guidance for local planning authorities and is a material consideration in determining applications. Most specifically in this instance, the below chapters are of most relevance:

- **Chapter 2** - Achieving Sustainable Development
- **Chapter 4** - Decision-Making
- **Chapter 5** - Delivering a Sufficient Supply of Homes
- **Chapter 9** - Promoting Sustainable Transport
- **Chapter 12** - Achieving Well-Designed Places
- **Chapter 14** - Meeting the Challenge of Climate Change, Flooding and Coastal Change
- **Chapter 15** - Conserving and Enhancing the Natural Environment
- **Chapter 16** - Conserving and Enhancing the Historic Environment

### **Other Guidance Documents:**

- Kirklees Highways Design Guide (2019)
- Housebuilders Design Guide (2021) - Nationally Described Space Standards
- National Design Guide
- Biodiversity Net Gain Technical Advice Note (2021)
- Planning Applications Climate Change Guidance (2021)
- West Yorkshire Low Emissions Strategy and Air Quality and Emissions Technical Planning Guidance (2016)

## **Assessment**

### **1. Principle of Development**

#### **Housing Land Supply**

The site is without notation on the Kirklees Local Plan. Policy LP1 of the Kirklees Local Plan states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in Chapter 2 of the National Planning Policy Framework. Policy LP2 sets out that, in order to protect and enhance the character of places, all development proposals should seek to build on the opportunities and help address the challenges identified in the Local Plan.

Paragraph 11 of the National Planning Policy Framework (NPPF) advises that plans and decisions should apply a presumption in favour of sustainable

development. It adds, within the same paragraph, that where the policies in the Development Plan, deemed most relevant to the consideration of the proposal in question are out-of-date, the default position is that planning permission should be granted unless:-

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- i) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.

In the case of applications for residential development such as this, the NPPF adds that policies will normally be considered 'out of date' if the Local Planning Authority cannot demonstrate a five year supply of deliverable housing land.

The Local Plan identifies a minimum housing requirement of 31,140 homes between 2013 and 2031 to meet identified needs. This equates to 1,730 homes per annum. National planning policy requires local planning authorities to demonstrate five years supply of deliverable housing sites against their housing requirement.

The 2023 update of the five-year housing land supply position for Kirklees shows 3.96 years supply of housing land, and the 2022 Housing Delivery Test (HDT) measurement which was published on 19th December 2023 demonstrated that Kirklees had achieved a 67% measurement against the required level of housing delivery over a rolling 3-year period (against a pass threshold of 75%). As the Council is currently unable to demonstrate a five-year supply of deliverable housing sites, and delivery of housing has fallen below the 75% HDT requirement, it is necessary to consider planning applications for housing development in the context of NPPF paragraph 11 which triggers a presumption in favour of sustainable development. This means that for decision making "Where there are no relevant development plan policies, or the policies which are most important for determining the application are outof-date (NPPF Footnote 8), granting permission unless: (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (NPPF Footnote 7) ; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination (NPPF Footnote 9)."

The Council's inability to demonstrate a five-year supply of housing land, or pass the Housing Delivery Test, weighs in favour of housing development but this has to be balanced against any adverse impacts of granting the proposal. The judgement in this case is set out in the officers assessment.

The proposal relates to the change of use and alterations to shops to form 4 apartments in Dewsbury and would assist in meeting the housing needs of the Council. This would be 'in line' with the aims of Chapter 5 of the NPPF, which states that small developments such as this can make an important contribution to meeting the housing requirement of an area and are often builtout relatively quickly.

In terms of design, Policy LP24 of the Kirklees Local Plan is relevant, in conjunction with Chapter 12 of the National Planning Policy Framework. Policy LP24, together with the Housebuilders Design Guide SPD, suggests that proposals should promote good design by ensuring inter alia that the form, scale, layout, and details of all development respects and enhances the character of the townscape, heritage assets and landscape. Furthermore, it requires that proposals protect the amenity of future and neighbouring occupiers and promote highway safety and sustainability.

#### Residential Use in Town Centre

The site falls within Dewsbury Town Centre and therefore, Policy LP13 of the Kirklees Local Plan is relevant. The policy encourages development that supports a strong, diverse economy that serves the local community by encouraging the vitality and viability of existing town centres. Paragraph 90 of the National Planning Policy Framework supports a mixed-use town centre that includes housing to grow and strengthen town centres.

Policy LP15 of the Kirklees Local Plan is also relevant in relation to residential uses within the town centre. This states that: *"Proposals for residential uses (including student accommodation) within the defined town centres asset out on the Policies Map will be supported subject to*

- (a) the protection of primary shopping areas, primary and secondary shopping frontages, and space for other main town centre uses within the defined centre. Residential proposals in these areas shall normally only be permitted on upper floors, and shall not prejudice existing established uses*
- (b) the protection of the character of the centre, and the local street scene. Proposals should retain and enhance the design and heritage features of buildings;*
- (c) the protection and retention of existing ground floor uses and active frontages both within and outside the primary shopping area, s*

- (d) the protection of the amenity of existing residents and future occupiers of the proposed residential use in accordance with amenity and design policies within the plan, and will in particular consider matters such as privacy, noise and air quality;*
- (e) the provision of space for the storage of sustainable modes of transport such as bicycles, where appropriate charging points of electric vehicles, and access to public transport;*
- (f) the provision of space for vehicular parking which is appropriate to the scale of the proposal, particularly where it would otherwise cause highway and pedestrian safety concerns;*
- (g) provision of affordable housing in accordance with policies set out in the Local Plan; and*
- (h) the provision of refuse storage and collection”*

In relation to the impact upon the role and function of the town centre, whilst the proposal would result in the loss of a main town centre use, the proposal would not be sited within a primary shopping area and the scheme would not result in the loss of an established commercial use given that the building is currently vacant. As such, it is considered that the proposed change of use would not compromise the function and role of Dewsbury Town Centre, nor would it adversely harm the viability and vitality of this centre. The principle of the proposed change of use could therefore be acceptable, but the principle of the development would also be subject to other considerations, including bullet points b and d-h of Policy LP15 of the Kirklees Local Plan. These matters will be discussed below within the officer report.

## **2. Impact on Visual Amenity and Historic Environment**

The NPPF offers guidance relating to design in Chapter 12 (achieving well designed places) whereby Paragraph 131 provides a principal consideration concerning design which states: *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*

Kirklees Local Plan Policies LP1, LP2 and LP24 all seek to achieve good quality, visually attractive, sustainable design to correspond with the scale of development in the local area, thus retaining a sense of local identity. 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, heritage assets and landscape...”*

It is noted that minor external alterations are proposed as part of the application. The submitted plans confirm that the existing shop fronts within

the front and side elevations of the building would be blocked up and replaced with new windows and openings to serve the flats. Furthermore, the existing first floor fenestration within the front elevation of the building would be blocked up and replaced with four windows. Given the small scale of the proposed alterations, it is considered that they would have no significant visual impacts on the character and appearance of the street scene.

It is therefore considered that the proposal would not cause detrimental harm with regard to visual amenity and would accord with the aims of Policy LP24 of the Kirklees Local Plan, Principles 2, 5, 12, 13, 14, and 15 of the Housebuilders Design Guide SPD, and the aims of Chapter 12 of the National Planning Policy Framework.

#### Impact on Historic Environment

Paragraph 135(c) of the NPPF sets out that development should be sympathetic to local character and history, including the surrounding built environment and landscape setting. Furthermore, LP35 of the Kirklees Local Plan requires development proposals affecting a designated heritage asset to preserve or enhance the significance of the asset, retaining those elements of the historic environment which contribute to the distinct identity of the Kirklees area and ensuring that proposals maintain and reinforce local distinctiveness.

Paragraph 210 of the NPPF is also of relevance and states that in determining applications, local planning authorities should take account of:

- a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) *the desirability of new development making a positive contribution to local character and distinctiveness.*

The application site is located within the Dewsbury Town Centre Conservation Area and close to 18, 20 and 22 Bond Street, Grade II listed buildings. As such, KC Conservation and Design were informally consulted on the proposed scheme.

Officers noted that the shop front would be lost as part of the application which would

It was considered that the external alterations proposed would materially detract from the character and appearance of this period property, the setting of Dewsbury Town Centre Conservation Area and 18, 20 and 22 Bond Street, Grade II listed buildings. There are no public benefits to outweigh the less than substantial harm to the setting and character of the adjacent Listed Buildings and the Dewsbury Town Centre Conservation Area. To permit the

development would be contrary to Policies LP24 and LP35 of the Kirklees Local Plan, Chapters 12 and 16 of the National Planning Policy Framework and the requirements of the Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990.

### **3. Impact on Residential Amenity of Neighbouring Residents**

Sections B and C of Policy LP24 state that alterations to existing buildings should: *“...maintain appropriate distances between buildings’ and ‘...minimise impact on residential amenity of future and neighbouring occupiers.”*

Further to this, Paragraph 135(f) of the National Planning Policy Framework states that planning decisions should ensure that developments have a high standard of amenity for existing and future users.

Principle 6 of the Kirklees Housebuilders Design Guide SPD states that: *“Residential layouts must ensure adequate privacy and maintain high standards of residential amenity, to avoid negative impacts on light, outlook and to avoid overlooking.”*

The SPD also provides advised separation distances for two storey dwellings:

- 21 metres between facing windows of habitable rooms at the backs of dwellings;
- 12 metres between windows of habitable rooms that face onto windows of a non-habitable room;
- 10.5 metres between a habitable room window and the boundary of adjacent undeveloped land; and
- For a new dwelling located in a regular street pattern that is two storeys or above, there should normally be a minimum of a 2 metres distance from the side wall of the new dwelling to a shared boundary.

The submitted plans confirm that no properties located north and east of the site would be affected by the proposed works.

#### Impact on 27 Union Street

27 Union Street is a residential property located south of the application site. It is noted that the proposed development would occupy a position approximately 8.2m to the front elevation of no.27. Although the separation distances would fall short of the 21m recommended within the Kirklees Housebuilders Design Guide SPD, it is taken into consideration that the current relationship along Bond Street falls short of this distance. Therefore, given that precedence has already been established within the street scene, it is considered that there would be no significant detrimental impact on the amenity of the neighbouring properties as a result of the proposed development.

### Impact on Wesley Chambers

Wesley Chambers is a mixed use property located east of the application site. It is noted that the proposed development would occupy a position approximately 10.9m to the neighbours front elevation. Whilst the separation distances would fall short of the 21m recommended within the Kirklees Housebuilders Design Guide SPD, it is taken into consideration that the current relationship along Union Street falls short of this distance. Therefore, given that precedence has already been established within the street scene, it is considered that the proposed development would not cause any additional overlooking, overbearing or overshadowing harm to the residential amenity of the neighbouring occupants, over and above the existing arrangements on site.

It is considered that once occupied the flats are unlikely to generate significant levels of noise. However, the site is surrounded by residential properties and the occupiers of these could potentially be disturbed by noise generated during the construction process. Therefore, should the application be approved, a footnote will be imposed limiting such works to between the hours of 7.30am and 6.30pm Monday to Friday, 8am and 1pm on Saturdays with no working permitted on Sundays or Public Holidays.

Having considered the above factors, the development proposed would have an acceptable impact upon the residential amenity of the neighbouring occupants and would comply with Policy LP24 of the Kirklees Local Plan (b) in terms of the amenities of neighbouring properties, KDP 6 & 16 of the Housebuilders Design Guide SPD and Paragraph 135 (f) of the National Planning Policy Framework.

#### **4. Impact on Residential Amenity of Future Occupiers**

Consideration must also be given to the amenity of future residents of the proposed dwelling. Taking into account Principle 16 of the Kirklees Housebuilders Design Guide SPD which sets out that:

*'All new homes should aim to be accessible and adaptable homes to meet the changing needs of occupants over time in accordance with Building Regulations' and that 'All new build dwellings should have sufficient internal floor space to meet basic lifestyle needs and provide high standards of amenity and living environments for future occupiers in accordance with Policy LP24'.*

National described space standards require the following gross internal floor area for a single storey dwelling:

- 1 Bedroom, 1-person dwelling set over 1 storey – 39 (37)\* square metres

- 1 Bedroom, 2-person dwelling set over 1 storey - 50 square metres
- 2 Bedroom, 3-person dwelling set over 1 storey – 61 square metres
- 2 Bedroom, 4-person dwelling set over 1 storey – 70 square metres

The proposed floor plans demonstrate that the two one bed roomed flats would have an internal floor space of approximately 44.5sqm (Flat 1) and 40.9sqm (Flat 3) which would be acceptable. However, it is noted that the two bed roomed flats would have an internal floor space of approx. 42sqm (Flat 2) and 46.6sqm (Flat 4) and would fail to accord with the nationally described space standards. As such, it is considered that the proposal would fail to adequately meet basic lifestyle needs and would provide an unacceptable standard of living for future occupants. To permit the development would be contrary to LP24(b) of the Kirklees Local Plan, Principles 6 and 16 of the Council's Housebuilders Design Guide SPD, and Paragraph 135 (f) of the National Planning Policy Framework.

## **5. Impact on Highway Safety**

Local Plan Policies LP21 and LP22 of the Kirklees Local Plan are relevant and seek to ensure that proposals do not have a detrimental impact on highway safety and provide sufficient parking. Furthermore, Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

This application is for the change of use and alterations to shops to form 4 apartments at 33 Union Street. The site is located approximately 228m from Dewsbury bus station, approximately 144m from Dewsbury railway station and there are numerous town centre shops and services within close proximity of the site. As such, the site benefits from being in a sustainable town centre location.

The proposals are for two 1-bedroom apartments and two 2-bedroom apartments. Whilst these would generally require one or two off road parking spaces per flat of this type and size, with visitor parking, given its sustainable town centre location and with parking restrictions on all the surrounding roads, Officers are happy to accept no vehicular parking at the site.

In view of the above, it is considered that the proposal would not cause detrimental harm to the safe and efficient operation of the highway network, in accordance with Policies LP21 and LP22 of the Kirklees Local Plan, Principles 12 and 19 in the Council's Housebuilders Design Guide SPD, guidance within the Council's Highways Design Guide SPD, and Chapter 9 of the National Planning Policy Framework.

## **6. Other Matters**

### Climate Change

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 predates 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.

In this case, due to the nature of the proposal is not considered reasonable to require the applicant to put forward any specific resilience measures with any future application.

### Construction Noise

Construction noise can give rise to loss of amenity to neighbouring noise sensitive receptors, therefore, should the application be approved, it is considered necessary for a footnote to be imposed restricting the times when noisy construction activities will be permitted.

### Noise

The proposed development site sits in the town centre area amongst mixed residential and commercial uses. KC Environmental Health have concerns about noise affecting the amenity of the occupiers and as such, should the application be approved, a condition would be imposed for the submission of a noise assessment in order to protect the amenity of the occupiers. There are neighbouring commercial uses and the applicant is informed that where residential and commercial uses share a party wall/floor, a higher level of sound insulation is required and a condition is also recommended to secure this.

### Waste

Principle 19 of the Housebuilders Design Guide SPD outlines how provision for waste storage and recycling should be incorporated into the design of new developments. The application provides insufficient information to demonstrate that a satisfactory layout could be provided on site which allows for the storage and collection of waste. As such, the development proposed would be contrary to with Policies LP21 and LP24 of the Kirklees Local Plan,

Principle 19 of the Council's Housebuilders Design Guide SPD, and the National Planning Policy Framework.

### Biodiversity Net Gain

The application form states that the development subject to the de minimis exemption, would be exempt from providing Biodiversity Net Gain. At this stage, Officers are only able to assess this on the basis of submitted information. Should the proposal be considered not exempt by reason of not being this or other relevant categories for the scale of the development then an appropriate condition, supported by a BNG metric submitted for the approval of the LPA, would be required to ensure on-site BNGs would last for at least 30 years to meet the requirements of this legislation.

There are no other matters considered relevant to the determination of this application.

### **7. Representations**

No representations were received during the course of the application.

### **8. Negotiations**

No amendments or additional plans have been sought or received during the course of the application.

### **9. 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 adverse impacts of granting permission would significantly and demonstrably outweigh any benefits of the development when assessed against policies in the NPPF and other material consideration. Therefore, the application is recommended for refusal.

**Recommendation: Refuse**

**Decision Authorisation - Delegated Powers**

**Application Number:** 2024/93327

**Officer Recommendation:** Refuse

**Reasons for Refusal**

1. The external alterations proposed would materially detract from the character and appearance of the Dewsbury Town Centre Conservation Area and 18, 20 and 22 Bond Street, Grade II listed buildings. There are no public

benefits to outweigh the less than substantial harm to the setting and character of the adjacent Listed Buildings and the Dewsbury Town Centre Conservation Area. To permit the development would be contrary to Policies LP15, LP24 and LP35 of the Kirklees Local Plan, Chapters 12 and 16 of the National Planning Policy Framework and the requirements of the Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990.

2. The proposed two-bedroom flats would fail to accord with the nationally described space standards and would fail to adequately meet basic lifestyle needs. Therefore, the proposal would provide an unacceptable standard of living for future occupants and would fail to accord with Policy LP15 and LP24(b) of the Kirklees Local Plan, Principles 6 and 16 of the Council's Housebuilders Design Guide SPD, and Paragraph 135(f) of the National Planning Policy Framework.

3. The application provides insufficient information to demonstrate that a satisfactory layout could be provided on site which allows for the storage and collection of waste. As such, the development proposed would be contrary to with Policies LP15, LP21 and LP24 of the Kirklees Local Plan, Principle 19 of the Council's Housebuilders Design Guide SPD, and the National Planning Policy Framework.

**Plans and specifications schedule:**

<b>Plan Type</b>	<b>Reference</b>	<b>Revision</b>	<b>Date Received</b>
Location Plan and Existing Floor Plans	-	-	19/11/2024
Existing and Proposed Side Elevations	-	-	19/11/2024
Existing and Proposed Front and Rear Elevations	-	-	19/11/2024
Proposed Floor Plans	-	-	19/11/2024
Climate Change Statement	-	-	19/11/2024

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. In this case, it was considered that no amendments could be made to overcome the reasons for refusal outlined above.

**Dated: 17/01/2025**