AGENDA ITEM NO: 5 (a)

Report to:	PLANNING COMMITTEE
Date of Meeting:	20 April 2022
Report from:	Assistant Director of Housing and Built Environment
Application address:	400 Harold Road, Hastings, TN35 5HG
Proposal:	Proposed part two storey part three storey rear extension and internal improvements (amended description).
Application No:	HS/FA/21/00997
Recommendation:	Grant permission
Ward: Conservation Area: Listed Building:	ORE 2018 Yes - NO No
Applicant:	Richard Davis per S C Design Associates LTD 32 Marlow Avenue Eastbourne East Sussex BN28 8SJ
Public Consultation Site notice: Press advertisement: Neighbour Letters: People objecting: Petitions of objection received: People in support: Petitions of support received: Neutral comments received: Application status:	Yes No No 5 0 0 0 0 0 Not delegated - 5 or more letters of objection
	received

1. Site and surrounding area

The application site relates to No. 400 Harold Road, a two-bedroom semi-detached dwelling house situated on the south-east side of Harold Road. Due to the topography of the area whereby the land levels drop from the north-west to south-west, these dwellings have basements, as a result the dwelling is two storeys from the front and three storeys from the rear. It is noted No. 398 the other property of the pair on the south-west side sits level with the application site whilst No. 402 on the north-east side is set up slightly higher. The

property is brick built with pebble dash render and tile hanging to the bay window with white UPVC windows with a plain tiled hipped roof. The dwelling is set back from Harold Road, an unmade track, with a hardstanding area at road level providing parking for the household and a set of steps providing access towards the dwelling and rear garden. Parking is possible along this road, but it is limited. To the rear, the site features a good-sized garden which is close to 48m in length, there is an area of hardstanding to the rear of the dwelling set mainly over two tiers with a set of steps into the dwelling and another down into the lower garden which is mainly laid to lawn. The site features good boundary treatments with high timber fencing with a number of dense and mature trees and other vegetation towards the rear of the site and surrounding sites which offer a good level of screening. The dwelling is unlisted and is not located within a conservation area designation.

Constraints

Sites of Special Scientific Interest (SSSI) Impact Risk Zone (threshold is not exceeded) Flood Zone 2 Strategic Flood Risk Assessment (SFRA) Flood Zone 3a Strategic Flood Risk Assessment (SFRA) Flood Zone 3b Strategic Flood Risk Assessment (SFRA) Flood Zone 2 Environment Agency Flood Zone 3 Environment Agency Groundwater Flooding (High) Great Crested Newts District Licensing Scheme Impact Risk Zone - White

2. Proposed development

This application is seeking planning permission for the erection of an extension to the rear of the dwelling. As noted above, due to the topography of the area, the application should be described as a part two storey part three storey extension, with the lower ground level extension being almost two storey and the upper-level extension above this creating the three-storey appearance from the rear.

The lower ground level element will occupy a footprint of 5m in depth by 4.7m in length, set in 0.2m from No. 398 Harold Road and 0.9m from No. 402. This element will feature a mono pitch roof which will measure approx. 2.85m to the eaves and approx. 5.4m to the ridge with this space to serve as an open plan kitchen area with the existing kitchen to become a dining room with a set of steps from the kitchen area into the dining room due to the ground level change. The extension will feature a set of French doors with fanlight over with a window either side within the rear elevation, a partially obscure glazed window within the side (north-east) elevation with no openings proposed within the side (south-west) elevation. This addition will be built of brick with a tiled roof and white UPVC units to match the host dwelling.

The upper-level element will be set within the roof of the lower-level element. It will measure 3.25m in depth by 2.9m in length and will overhang the lower-level addition by approx. 0.3m. This addition will feature a bonnet roof set down 0.3m from the existing soffit level, measuring approx. 2.1m to the eaves and approx. 3.2m to the highest point above the lower-level element, the extension in its entirety will measure approx. 5.7m to the eaves and approx. 6.9m to the highest point above the ground level. The proposed upper floor (bathroom) will cut into the roof of the lower floor (kitchen). The existing bathroom will then become a bedroom. A first floor rear elevation window, relating to bedroom 1 will be reduced in size from a three-pane window to a two pane to accommodate the upper floor extension. On the

upper floor there will be one window within the rear elevation which will serve the new bathroom, no other openings are proposed. This addition will have tile hung walls with a tiled roof and white UPVC unit to match the existing dwelling house.

No other form of development is proposed under this application.

The application is supported by the following documents:

- Photographs of site.
- Land stability statement by Stephen Johnson Consulting Engineers Ltd (dated: 8th March 2022).
- Sustainable drainage systems (SUDs) report.

Relevant planning history

HS/FA/21/00541 Proposed two storey rear extension and internal improvements. Withdrawn on 29/09/21
HS/FA/07/00969 Two storey extension at rear. Permission with conditions on 09/01/08 (This development was not built out).
HS/FA/07/00698 Two storey extension with roof terrace and conservatory at rear. Refused on 05/10/07

National and local policies

<u>Hastings Local Plan – Planning Strategy 2014</u> Policy FA5 - Strategic Policy for Eastern Area Policy SC1 - Overall Strategy for Managing Change in a Sustainable Way Policy SC7 - Flood Risk

<u>Hastings Local Plan – Development Management Plan 2015</u> Policy LP1 - Considering planning applications Policy DM1 - Design Principles Policy DM3 - General Amenity Policy DM4 - General Access Policy DM5 - Ground Conditions

Revised Draft Local Plan (Regulation 18)

Other policies/guidance National Design Guide Supplementary Planning Document - Householder Development: Sustainable Design East Sussex County Council Highways Minor Applications Guidance (2017)

National Planning Policy Framework (NPPF)

Paragraph 8 sets out the three overarching objectives of the planning system in order to achieve sustainable development. Those are: economic (by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation); social (to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;); and environmental (to protect and enhance our

natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy)

Paragraph 9 advises that plans and decisions need to take local circumstances into account, so they respond to the different opportunities for achieving sustainable development in different areas.

Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development. For decision-taking this means:

- a) approving development proposals that accord with an up-to-date development plan without delay; or
- b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, 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; 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.

Paragraph 12 of the NPPF states that the development plan is the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan, permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Paragraph 47 of the NPPF sets out that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise.

Paragraph 120 of the NPPF states, amongst other things, that decisions should promote and support the development of under utilised land and buildings, especially if this would help meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

Paragraph 124 of the NPPF states that planning decisions should support development that makes efficient use of land.

Paragraph 130 of the NPPF requires that decisions should ensure developments:

- Function well;
- Add to the overall quality of the area for the lifetime of that development;
- Are visually attractive in terms of
 - * Layout
 - * Architecture
 - * Landscaping
- Are sympathetic to local character/history whilst not preventing change or innovation;
- Maintain a strong sense of place having regard to
 - * Building types
 - Materials
 - * Arrangement of streets

in order to create an attractive, welcoming and distinctive places to live, work and visit.

- Optimise the potential of the site to accommodate an appropriate number and mix of development;
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community

cohesion and resilience.

Paragraph 131 of the NPPF states that decisions should ensure new streets are tree lined, that opportunities are taken to incorporate trees elsewhere in developments.

Paragraph 134 of the NPPF states that development that is not well designed should be refused but that significant weight should be given to development that reflects local design policies and government guidance on design and development of outstanding or innovative design which promotes high levels of sustainability and raises the standard of design in the area, provided they fit with the overall form and layout of their surroundings.

Paragraph 135 of the NPPF seeks to ensure that the quality of an approved development is not materially diminished between permission and completion through changes to the permitted scheme.

Paragraph 183 of the NPPF states that decisions should ensure a site is suitable for its proposed use having regard to ground conditions and risks arising from land instability and contamination.

Paragraph 184 of the NPPF sets out that where sites are affected by land stability or contamination, responsibility for securing a safe development rests with the developer and/or landowner.

Paragraph 185 of the NPPF states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development - and avoid noise giving rise to significant adverse impacts on health and the quality of life; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

3. Consultation comments

None consulted.

4. Representations

In respect of this application a site notice was displayed to the front of the site along Harold Road. Following submission of amended description/plans and additional information an amended site notice was put up.

5 no letters of objection have been received from 5 different properties raising the following concerns:

- Description inaccurately describes proposal as two storey, due to topography it is in fact three storey.
- The proposed development is overbearing and out of keeping with the surrounding area.
- Harm to the amenity of the neighbouring properties in terms of light, privacy and outlook.
- Concerns to ground conditions/land instability and possible structural damage to neighbouring properties.
- Other alternatives should be considered.
- Loss of idyllic views.

The description of the application has been amended to more accurately describe the proposals.

In regard to concerns to possible damage to neighbouring properties, this would be a legal/civil matter between the applicant and neighbour(s). The applicant should ideally serve a party wall agreement with the neighbours(s) due to the position of the extension in relation to the neighbouring sites, this has been attached as Informative note 4. This is not however something that can be required through the planning process as it is dealt with under separate legislation.

Whilst any possible loss of view of the surrounding area is unfortunate, this is not a material planning consideration.

The other concerns noted above will be discussed below within the main body of the report.

5. Determining issues

The main issues relevant to the determination of this application are the principle of the development, the impact of the proposed extension on the character and appearance of the area, residential amenity of neighbours, future residential amenities, highway safety and parking, land stability and flooding.

a) Principle

The site is in a sustainable location and the application is therefore in accordance with Policy LP1 of the Hastings Local Plan - Development Management Plan 2015 in this respect and acceptable in principle subject to other Local Plan policies.

b) Impact on character and appearance of area

Policy DM1 of the Hastings Local Plan - Development Management Plan (2015) states, all proposals must reach a good standard of design, which includes efficient use of resources, and takes into account:

- protecting and enhancing local character;
- showing an appreciation of the surrounding neighbourhood's historic context, street patterns, plot layouts and boundaries, block sizes and scale, height, massing and materials.

The proposed extension is to be situated to the rear of the dwellinghouse and will not project past the side elevation of the dwelling with narrow spacing established between the application site and No. 402 Harold Road. The site benefits from good boundary treatments with high timber fencing with a number of dense and mature trees and other vegetation towards the rear of the site and surrounding sites which offer a good level of screening.

The Supplementary Planning Document - Householder Development: Sustainable Design states that materials should generally either match or complement those of the existing dwelling. The chosen materials of the development will be in keeping with the host dwelling, providing a consistent and complimentary finish between the existing and proposed elements. Furthermore, the chosen windows are of a design which reflects the main dwelling.

The roof of the lower-level addition will follow the same pitch as the main roof, it is considered the addition will be read as a subservient addition to the dwelling house. The proposed upper level is not of any particular high standard of design in that the proposed roof fails to relate well to the host dwelling. However, given the limited visibility as viewed from Harold Road, it is not considered this feature would harmfully affect the character or appearance of the public realm and as such the application is considered acceptable in this respect. The development is therefore considered to be in line with the Supplementary Planning Document - Householder Development: Sustainable Design and the aims of Policy DM1 of the Hastings Local Plan - Development Management Plan (2015).

c) Impact on neighbouring residential amenities

Policy DM3 of the Hastings Local Plan - Development Management Plan (2015) states, in order to achieve a good living standard for future users of proposed development and its neighbours it should be demonstrated that amenity has been considered and appropriate solutions have been incorporated into schemes. Permission will be given for development where:

 the use of the scale, form, height, mass, and density of any building or buildings, reduces or avoids any adverse impact on the amenity (privacy, over shadowing, loss of daylight) of neighbouring properties.

The proposed works will be located closest to Nos. 398 and 402 Harold Road, as such the impact of the proposed development on these occupants in terms of privacy, outlook, daylight and sunlight levels and overshadowing will need to be assessed.

<u>Privacy</u>

The proposed lower-level addition will feature a set of French doors with fanlight over with a window either side within the rear elevation. Given the position of these windows views will be directed towards the boundary fencing which surrounds the site, as such there are no concerns in this regard. It is also acknowledged that there are already openings within this elevation, albeit set further back which offer similar views. It is also proposed for a window within the side elevation facing onto No. 402 Harold Road. From the plans it would appear this will serve the stairs from newly created kitchen into the dining room. To reduce any overlooking or the sense of being overlooked the window will be partially obscured glazed and fixed shut below 1.7m from the floor level (Condition 5). It is noted there are no openings proposed on the side elevation facing onto No. 398 Harold Road. The proposed upper-level addition will include a window within the rear elevation which will serve the bathroom. Given the existing views already achieved from the upper windows of the application site and neighbouring sites there is already a degree of mutual overlooking between the sites, as such it is not considered the new bathroom window will cause any additional overlooking. No other openings are proposed. Subject to condition 5 being applied in respect of the proposed side kitchen window, no concerns are raised in respect of privacy.

<u>Outlook</u>

Whilst it is noted the lower-level addition will sit closest to No. 398 Harold Road, a section of 3m high timber fencing with trellis above sits along this boundary in line with the raised decking area of No. 398 Harold Road with approx. 2m high timber fencing thereafter. As a result, when stood on the raised decking area of No. 398 the majority of the proposed extension will be screened thereby reducing any impact. Given the position and elevation of

the doors and the raised decking of No. 398 and the boundary treatment it is not considered the outlook of these occupants will be significantly impacted as a result of these works. The proposed upper-level addition will be positioned approx. 3.2m from the rear openings of No. 398 Harold Road so any impact in terms of outlook from this element will be limited. The extensions will also be positioned close by to No. 402 Harold Road. There is 1.7m-2m high timber fencing in place along this boundary. It is considered given the moderate depth of the upper-level addition (3.25m) and the spacing between this and the rear windows of No. 402, outlook will not be significantly altered with views past the extension and out towards the rear achieved. The window and door within the side elevation of single storey addition at No. 402 Harold Road is already affected to a degree by the existing arrangement with a set of openings within the rear elevation of this addition to remain unaffected in terms of outlook, with the proposed extension to sit in line with the rear elevation of this neighbouring addition.

Daylight and sunlight levels

The proposed extension will be positioned 0.2m from the boundary of No. 398 Harold Road and the dwelling and 0.9m from the boundary with No. 402 Harold Road and approx. 2m from the dwelling. As such, a BRE daylight and sunlight test has been carried out to determine the impact of the proposal on the daylight and sunlight levels into the nearest openings of Nos. 398 and 402 Harold Road. To carry out the test, a 45-degree line was taken from the proposed extension on the block plan and on the proposed rear elevation plan, should both lines significantly cross any of the openings of the neighbouring properties then this would result in a significant loss of daylight and sunlight levels. The test has revealed that the proposed extension will not cause a significant harmful impact upon the existing daylight and sunlight levels into the rear elevation of either of these properties. This has also been demonstrated by the agent on the proposed rear elevation plan. It is noted the window and door within the side elevation of single storey addition at No. 402 Harold Road is already affected to a degree by the existing arrangement with a set of openings within the rear elevation of this addition to remain unaffected, with the proposed extension to sit in line with the rear elevation of this neighbouring addition.

Overshadowing

The BRE 'Sun Layout Planning for Daylight and Sunlight' states at paragraph 3.3.7 that at least half of the rear garden should receive at least 2 hours of sunlight on 21st March. Having carried out the test using the method as detailed within BRE 'Sun Layout Planning for Daylight and Sunlight' the proposed extension will not impinge upon this requirement, given the orientation of the neighbouring properties in relation to the proposed extension and the considerable size of the rear gardens of these sites. As such it is not considered that overshadowing would harmfully affect the neighbouring residential amenity of Nos. 398 and 402 Harold Road.

Taking the above into account, it is not considered that the proposal will cause significant harm to the amenity of the neighbouring properties of Nos. 398 and 402 Harold Road in terms of privacy, outlook, daylight and sunlight levels and overshadowing. As such, the proposed development is in agreement within the aims of Policy DM3 of the Hastings Local Plan - Development Management Plan (2015) and the Supplementary Planning Document - Householder Development: Sustainable Design.

d) Future residential amenities

Policy DM3 (g) of the Hastings Local Plan - Development Management Plan (2015) states that appropriate levels of private external space should be included within developments, especially for larger homes designed for family use (dwellings with two or more bedrooms). In

respect of proposed family dwellings, the Council expects to see the provision of private garden space (normally at the rear), of at least 10m in length.

This property is a two-bedroom property and will increase to a three-bedroom following the proposed works, as such the above noted policy is relevant to this case. Having reviewed the application, it is noted that the rear garden measures in excess of 40m in length from the proposed rear addition to the rear boundary, which meets the 10m requirement, the majority of the garden will remain as existing and will be in excess of this requirement. As such, it is considered sufficient garden space is to remain in place for present and future occupants to enjoy, thereby the aims of Policy DM3 (g) of the Hastings Local Plan - Development Management Plan (2015) are met.

e) Highway safety/parking

Policy DM4 of the Hastings Local Plan - Development Management Plan (2015) requires safe access on to and within a site, and adequate provision for parking, taking into account guidance as set by East Sussex County Council.

East Sussex County Council Highways Minor Applications Guidance (2017), paragraph 3.8.1, states, for individual dwellings car parking should generally be provided as follows:

- 1. 1 or 2 bedroom dwelling: 1 space
- 2. 3 or 4 bedroom dwelling: 2 spaces

The existing dwelling is a 2-bedroom property, with the proposed extension resulting in a net increase of 1 bedroom. As per East Sussex County Council guidance, 3- or 4-bedroom properties require a total of 2 parking spaces. As such the proposed will require an increase in parking. It is acknowledged the site benefits from a parking area to the front of the site with further parking also available along Harold Road if required. As such it is considered this arrangement is acceptable in respect to Policy DM4 of the Hastings Local Plan - Development Management Plan (2015) and the guidance provided by East Sussex County Council.

f) Land Stability

During determination of this application concerns to the instability of the ground were raised in comments from neighbouring residents. No signs of instability such as cracks were evident on site when the site visit was undertaken. However, given the concerns noted by neighbouring residents the Local Planning Authority requested the applicant provide written correspondence from a relevant and suitably qualified professional to conclude that there is no issue on site. Subsequently the applicant employed Stephen Johnson a structural engineer of Consulting Engineers Ltd, who visited the site and provided a statement on the 8th of March 2022 for which he states there is no reason for concern about the stability of the slope, in that there are no tell-tale tension cracks or other indications of instability. The statement concludes that the impact of the proposed extension will no doubt have the same impact as those of the neighbouring properties, completed some years ago with no effect. This has satisfied any concerns which have been raised to the possibility of instability of the ground. It should also be noted that the responsibility for securing a safe development, without impact on other properties and people rests with the developer and/or landowner as stated in 184 of the National Planning Policy Framework.

g) Impact on Great Crested Newts

The development falls within the white impact risk zone for Great Crested Newts and as the application is a Household one, there is no requirement to consult NatureSpace in respect of Great Crested Newts. Informative note 5 is added should Great Crested Newts be found on site at any stage of the development works.

h) Site Constraints

SSSI Impact Risk Zone:

The site is within a SSSI IRZ. The scale of development does not fall within the threshold for consultation with Natural England and as such it is not considered that there will be any impact on SSSIs.

Flooding:

It is acknowledged that the site is affected by a number of flooding constraints, although these only affect the lower garden which is mainly laid to lawn and significantly distanced from the proposed development. It is also important to note there is an area of hardstanding to the rear of the dwelling set mainly over two tiers. The proposed extension is proposed to replace part of this area. As such there will be no increase in the impermeable area on site with this noted within the SUDs report with no on site storage required. Given the existing arrangement on site, the siting and position of the proposed development with the existing level of soft landscaping to remain it is not considered the proposal will harmfully impact upon flood risk on and off site, no further consideration is thereby required.

6. Conclusion

In light of the above assessment, it is considered that the proposed extension is acceptable and will not cause harm to the character and appearance of the area or cause significant harm upon the amenity of the neighbouring properties. The proposed development is in line with the aims of Policies DM1, DM3, DM4 and DM5 of the Hastings Local Plan -Development Management Plan (2015), the Supplementary Planning Document -Householder Development: Sustainable Design and the relevant sections of the National Planning Policy Framework. Therefore, it is recommended that permission is granted subject to the attached conditions.

These proposals comply with the Development Plan in accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004 which states:

"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

The Human Rights considerations have been taken into account fully in balancing the planning issues.

7. Recommendation

Grant permission subject to the following conditions:

- 1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
- 2. The development hereby permitted shall be carried out in accordance with the following approved plans:

Site plan, block plan (400/01C), SC/RSD.2021.71.01C, SC/RSD.2021.71.02E and SC/RSD.2021.71.07B

3. With the exception of internal works the building works required to carry out the development allowed by this permission must only be carried out within the following times:-

08.00 - 18.00 Monday to Friday 08.00 - 13.00 on Saturdays No working on Sundays or Public Holidays.

- 4. The materials to be used in the construction of the external surfaces of the extensions hereby permitted shall match those used in the existing building.
- 5. The side kitchen window within the lower level extension shall be obscure glazed with obscure glass to a minimum level of obscurity equivalent to Pilkington Texture Glass Level 3, or similar equivalent and be permanently fixed shut and non-opening below 1.7 metres from finished floor level. The development hereby approved shall not be occupied until the obscure glass is installed, and once installed, the window shall be permanently maintained in that condition.

Reasons:

- 1. This condition is imposed in accordance with the provisions of Section 91 of the Town and Country Planning Act 1990.
- 2. For the avoidance of doubt and in the interests of proper planning.
- 3. To safeguard the amenity of adjoining and future residents.
- 4. In the interests of the visual amenity of the area.
- 5. To safeguard the amenity of adjoining and future residents.

Notes to the Applicant

1. Failure to comply with any condition imposed on this permission may result in enforcement action without further warning.

- 2. Statement of positive engagement: In dealing with this application Hastings Borough Council has actively sought to work with the applicant in a positive and proactive manner, in accordance with paragraph 38 of the National Planning Policy Framework.
- 3. The applicant is advised that this notice of decision does not grant consent or imply any grant of consent for the applicant to enter onto any adjoining land, to either construct or subsequently to maintain the proposed development.
- 4. Your attention is drawn to the requirements of the Party Wall etc. Act 1996.
- 5. The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to: deliberately capture, disturb, injure or kill great crested newts; damage or destroy a breeding or resting place; deliberately obstructing access to a resting or sheltering place. Planning consent for a development does not provide a defence against prosecution under these acts. Should great crested newts be found at any stages of the development works, then all works should cease, and Natural England should be contacted for advice.

More details on the district licensing scheme can be found at <u>www.naturespaceuk.com</u>

Contact details: info@naturespaceuk.com

Officer to Contact

Mrs L Fletcher, Telephone 01424 783261

Background Papers

Application No: HS/FA/21/00997 including all letters and documents