

## **DELEGATED REPORT / CASE OFFICER'S ASSESSMENT**

**Ref No:** ST/0424/20/TPN

**Proposal:** Application to determine if prior approval is required under Part 16, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, for the installation of a new 17 metre high monopole supporting 6 no. antennas with a wrap around equipment cabinet at the base of the column, installation of 3 no. new equipment cabinets and ancillary development thereto.

**Location:** Near Lamp 1724  
North Verge  
Shields Road (A1018)  
Cleadon  
SR6 7PX

**Site Visit Made:** 21/07/2020

### **Relevant policies/SPDs**

N/A

### **Description of the site and of the proposals**

This application seeks prior approval under Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the siting and appearance of works to upgrade an existing telecommunications monopole installation along Shields Road in Cleadon. The proposal seeks to upgrade the existing installation, to enable Hutchinson 3G UK Ltd (H3G) to deliver the latest 5G technologies and to provide additional coverage capacity for the SR6 area of Cleadon, including coverage for part of the A1018 which is a major arterial route. The applicant has stated that at this present time of the pandemic it is paramount that digital connectivity is supported and maintained throughout the country, especially given the shift in user demand from city centres and places of work to residential areas / suburbs and given the need to support the emergency services. They have also highlighted the importance of advanced, high quality and reliable communications infrastructure being essential for economic growth and social well-being.

The telecommunications infrastructure at this site is shared – operated by both Hutchinson 3G UK Ltd (H3G) & EE (UK) Ltd, both licensed operators of an electronic communications network in accordance with the Communications Act 2003. EE Ltd was formerly T-mobile and Orange.

Proposed works comprise the installation of a new 17 metre high monopole, supporting six antennas with a wrap-around equipment cabinet at the base of the column, the installation of new equipment cabinets, and ancillary development. As part of the proposed works the existing 12 metre high monopole and cabinet at the site would be removed. The proposed monopole would be of galvanised steel and grey in colour. The proposed equipment housing would be of steel and grey in colour.

Application details state that the design of the monopole has to accommodate the additional equipment but requires separation between antenna systems so as not to create interference. However it would maintain a slim appearance albeit with a bulkier headframe. As the new monopole will be complementary to the existing 2G/3G/4G technologies at the site it must be positioned within 30 metres of the existing monopole to replicate the coverage. The new monopole has also been designed to be future proofed so that should EE require 5G service provision in the future then it could be delivered from this monopole and equipment without any significant changes to the design.

It should be noted that as part of the application, the applicant has confirmed that they have notified the Council as landowner in accordance with Condition A.3 'Prior Approval' of Part 16 of the Town and

Country Planning (General Permitted Development) (England) Order 2015 (as amended). This was via correspondence sent to the Local Highway Authority given that the land is adopted highway.

## **Publicity / Consultations**

Neighbour notification expiry date 04/08/2020

Consultation expiry date 04/08/2020

Site notice expiry date 11/08/2020

### **1) Neighbour responses**

#### **Owner / occupier of 23 Ashleigh Gardens, Cleadon**

Serious concerns are raised regarding the proposal summarised as follows:

- The proposal would be to the front of the existing 'Cleadon' sign and close to my home.
- The new monopole and cabinets would be in addition to the existing monopole and cabinets at this location
- Two Ward Councillors agree with my concerns.
- The submitted documents repeatedly misrepresent the nature of the proposed location, either intentionally or through a lack of knowledge of the local area.
- Under the heading 'Siting' of the 'Supplementary Information' document the applicant states "*the surrounding area is light industrial in character*". This is not true – there is no industrial activity, light or otherwise for miles around.
- Page 12 of the 'Supplementary Information' document refers to the obligation for developers to consider alternative sites (including possible greenfield locations) stating "*there are no greenfield locations immediately adjacent to the site*". However there are numerous greenfield locations in the vicinity. There is even what appears to be another telecoms tower in a field roughly 400 metres away. It may be preferably for the development, on cost grounds, to site the new monopole next to the existing monopole, but there are alternative locations available.
- Under the heading 'Appearance' of the 'Supplementary Information' document the applicant makes reference to 'urban clutter' in the area. I can find no definition of this term, but can confirm that the area contains houses, fields and a little further away a farm.
- The 'Supplementary Information' document refers to existing 'linear structures' which will '*help the proposed column and associated equipment assimilate with its surroundings*'. An example of this is under heading titled 'Appearance' which refers to road signage, telegraph poles and lighting columns in the immediate vicinity. A cursory glance at the surrounding area shows that there are only two relatively small signs and one solitary telegraph pole 70 metres from the site. Neither the road signs nor the distant telegraph pole will provide any assistance in assimilating the proposed column, which instead will appear incongruous within the street scene.
- The additional mast, cabinets and ancillary development would result in a cluttered appearance which would be detrimental to the visual amenity of the area. The new mast would be above the tree canopy, which visually will make the new mast very dominant in appearance.
- Due to its height the mast would have a detrimental impact on the setting of the conservation area, contrary to objective CA-C1 of the adopted Supplementary Planning Document 14 'Cleadon Conservation Area Management Policy'.
- I understand that the principle of a mast cannot be questioned. However there are more suitable sites that could be utilised to reduce the visual impact. I would suggest moving the mast northwest, and there are sites on the other side of the junction with Sunderland Road that would be more appropriate. Either to the south west of the A1018 in a greenfield location on the edge of a farmer's field, or north west of the junction between the A1018 and Sunderland Road, also a greenfield location behind trees growing on a mound. This would partially screen the monopole and remove the clutter of two large monopoles, nine cabinets and ancillary development in a single, high profile location at the entrance to Cleadon.

- Consultation on this matter has been minimal. Only myself, two neighbours, and the owners of the farm along Sunderland Road have been notified by the developers. In addition only one site notice was posted. This hardly suggests full and open disclosure.
- A change in the location of the monopole would mitigate health risks to my family and those living around us. Whilst I understand that such risks have neither been definitively proven or disproven, I note that best practice is not to site this type of equipment close to schools. My grandchildren, who live with us, are surely entitled to the same caution and protection as their peers. The same applies to the rest of my family and neighbours.
- I would like to speak to planning committee if the chance arises. The letter I received states that if you make written representations for or against the development proposal (on land use planning grounds), and you request speaking rights then the application may be determined by the Planning Committee unless there is no time before the 56 days decision period expires. Therefore if the matter can be considered by the Planning Committee I would like to speak at the Committee meeting. Two of my local Councillors have requested the same opportunity.

### **Owner / occupier of 22 Ashleigh Gardens, Cleadon**

The proposal would be close to my home. It would be arguably taller than anything in the vicinity and it could be located further down the road, where it would be away from any residential accommodation.

*Case Officer Comments: Other objections raised by the owner / occupier of 22 Ashleigh Gardens are exactly the same as those summarised in the representation made by the owner / occupier of 23 Ashleigh Gardens (with the exception of the reference to health risks and speaking to planning committee protocols which were not included). These other points have therefore not been repeated in the report given that they are summarised in detail above.*

### **Councillor Representations**

#### Cllr Atkinson

Based on my knowledge of the location it is unsuitable to have a structure of this prominence near to residential properties. An alternative siting would be much more amenable. I would be interested to know if the number of masts at this location can be restricted, as the greenbelt and quality of the panorama is detrimentally affected by the associated boxes and increasingly imposing masts. I would be willing to speak to Planning Committee.

#### Cllr Carter

On viewing the site for the 5G mast it appears that this will be in addition to the existing 4G mast, which would be a detriment to both the environment and outlook of the entrance to Cleadon Village. I would like to know if any other sites have been considered in the area as these would have less impact on the village.

*Case Officer Comments: Both Councillors were made aware of the following:*

- *The proposal is affectively seeking to upgrade an existing base station in order to provide 5G coverage in this area, and so the proposed monopole must be positioned within 30 metres of the existing monopole in order to replicate the existing coverage plus the additional 5G coverage.*
- *The applicant has stated that there are no other suitable existing buildings, masts or other structures within this proximity to the existing site on which the antennas could be installed.*
- *The applicant has confirmed in writing that the existing monopole would be removed as part of the proposed works. However in order to maintain coverage there would be a short period of time when both would need to be in situ. The intention is to retain the existing monopole for a short period of time, integrate the 5G antennas on to the new monopole and then to remove the existing monopole.*

- *The higher monopole is a technical requirement associated with 5G coverage.*

## **2) Other Consultee responses**

### **Traffic and Road Safety Team (the local highway authority)**

#### First representation

Siting of the pole and cabinets would obstruct the village waymarker. The waymarker should be re-located by the applicant to the front of apparatus.

*Case Officer Comments: The applicant was asked whether the 'Cleadow' waymarker road sign would be re-positioned as part of the proposed works. They subsequently submitted amended drawings illustrating the waymarker road sign in a different position.*

#### Second representation

No objections

*Case Officer Comments: The Traffic and Road Safety Team made direct contact with the applicant's agent stating that the amended plans are approved for the re-location of the waymarker.*

### **Assessment**

#### **The prior approval process**

Before installing certain telecommunications apparatus under permitted development rights an electronic communications code operator must apply to the local planning authority for a determination as to whether their 'prior approval' of the siting and appearance of the development is required - as set in Schedule 2 Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). A prior approval determination is therefore not the same as an application for planning permission in terms of decision making as the Council must only consider the siting and design of the development.

The Council must make its decision within 56 days of receiving the application on the acceptability of the siting and appearance, or the applicant may proceed to erect the proposal as permitted development.

#### **Siting**

The proposal would be at a highly prominent site, being located adjacent to a busy classified arterial route (the A1018) at the entrance to Cleadow, on land that is designated as Green Belt within the adopted South Tyneside Local Development Framework. However the proposal is essentially to upgrade an existing base station; it would be part of an existing telecommunications installation where there is an existing 12 metre high monopole. Application details state that the operator is limited in siting options as there is a requirement to provide equivalent 2G/3G/4G coverage and capacity for this area of Cleadow, whilst also providing new 5G services. The search area is very limited, as the existing site is shared and as such the surrounding network of existing cells and services is configured to the position of that existing site (with a 4G cell range of 250 metres). Cellular networks are made up of several individual cell areas, each of which has a base station within it. The applicant's agent has stated that a good analogy for describing a cellular network is that of a patchwork quilt with each cell area being one of the many patches that are sewn together making up the network 'quilt'. The site on Shields Road is part of the wider network so it not only provides the coverage and capacity for a number of dwellings, but also coverage and capacity to users of a section of the A1018 within the cell, which as stated is a major arterial route.

Due to the requirement to replicate the coverage and capacity to the surrounding area provided by the existing monopole and associated equipment (as well as to provide the additional 5G coverage), the proposal must therefore be within close proximity of the existing monopole (within 30 metres) to fit within that existing network cell configuration.

The applicant's agent has confirmed that the site selection was progressed in accordance with the applicant's license obligations, guidance within the National Planning Policy Framework (NPPF) (February 2019) and the Code of Best Practice, and that it represents the least environmental intrusive, and most technically suitable site available. No other specific sites were considered given that the proposal is effectively an upgrade of an existing telecommunications site. The other sites (and their cell range) in Cleadon provide coverage for other parts of Cleadon. The plan is to upgrade these sites in due course to provide 5G to those areas. However the upgrading of other existing sites in Cleadon would not provide coverage to SR6 area of Cleadon and the section of the A1018 covered by this cell. As stated above cell areas are small – typically 250 metres for 4G in areas such as Cleadon (and even less at 100 metres in built up areas). To re-position the proposal any more than 30 metres away from the existing monopole within the telecommunications site would cause disruption to services, which would include disruption to emergency services as the applicant provides the network for them. This would be contrary to Government advice which is to support telecommunications especially during this time of the pandemic.

There is an existing mast located a distance of approximately 350 metres to the north west of the current application site (on the opposite side of Shields Road). This existing mast is 17.5 metres high, and was recently granted planning permission Ref: ST/0963/18/TFUL to improve the speed and capacity of the network and to allow Vodafone / Telefonica to enhance the 2G, 3G and 4G speed and capacity to the surrounding area. This site is also located within the designated open Green Belt land the same as the application site, with open farmland either side. However this existing mast is within the next cell area; and the applicant's agent has confirmed that it would not provide coverage to the target area for this application, which includes a section of the A1018 as users travel along it. As users move along the A1018 they will pass from cell to cell, and if one cell is not upgraded the call would likely drop out.

In accordance with NPPF (February 2019), the applicant is seeking permission to upgrade an existing telecommunications site, and has stated that they have explored the possibility of erecting antennas on an existing building, mast or other structure. However they have provided a statement stating that no such features are available within 30 metres of the site (where the proposal must be positioned).

Given the concerns raised by the objector, the applicant's agent was asked whether it would be possible to re-position the proposal (in particular the monopole) 30 metres from the existing monopole within the telecommunications site, so that it would be further from the objector's property (23 Ashleigh Gardens). However they responded by stating that re-positioning the proposal would require 'radio buy in'. A new trial dig and stats scan would also be required to establish if the area is clear of services. This would take weeks / months to organise and ultimately if they came back not clear, the applicant would be back to the current situation and unnecessary delays would have been caused.

Notwithstanding the above, it is considered that to re-position the proposal 30 metres from the existing monopole would not be an improvement in terms of its' siting, other than being a bit further from the objector's dwelling. The proposal in its current position would still be positioned approximately 60 metres from the objectors dwelling, and approximately 55 metres from the nearest dwelling 24 Ashleigh Gardens (over 40 metres from the nearest part of the garden of 24 Ashleigh Gardens). These dwellings do not directly face the application site, and there are mature trees positioned in the vicinity of the proposal. It is therefore considered that the siting of the proposal including the monopole would have no unacceptable impacts on the amenities of the occupiers of any neighbouring properties (including the objector) in relation to outlook and over dominance or overshadowing. This is especially given the slim, vertical design of the proposed monopole.

Although this is not a planning policy assessment, the application site is within the designated Green Belt. In accordance with NPPF (February 2019), the proposal would comprise buildings, which are inappropriate development in the Green Belt subject to certain exceptions. However it is considered that the proposal would fall under exception (d) *“the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces”*. This is because although the proposal would be higher, it would not be materially larger given its slim vertical design. It is also considered that the proposal would fall under exception (g), which includes the *“redevelopment of previously developed land...which would not have a greater impact on the openness of the Green Belt than the existing development”*. Although the proposed monopole would be higher than the existing, given its slim vertical design it is considered that it would not result in a materially greater impact on the openness of the Green Belt over and above the existing situation.

The applicant’s agent has confirmed in writing that the existing monopole would be removed as part of the proposed works as soon as it is reasonable practicable to do so to retain network coverage in this area (as required by Condition A.2 (2) of Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). This states that Class A development is permitted subject to the condition that any electronic communications infrastructure provided in accordance with the permission is removed from the land on which it is situated (ii) *“... as soon as reasonably practicable after it is no longer required for electronic communications purposes”*, and that such land is then restored to its condition before the development took place.

The applicant’s agent has confirmed in writing that in order to remove the existing monopole, the new monopole would need to be fully integrated into the network. Therefore the intention is to retain the existing monopole for a short period of time, integrate the 5G antennas on to the new monopole and then to remove the existing monopole when it is practicable. The intention is not to have both monopoles in place for an extended period but simply to ensure that the most effective support for the network is provided during the works. This timescale would be dependent on available teams to complete the works, the integration of the new site, and the operational requirement to maintain the network to its fullest capacity during this unprecedented pandemic period.

The applicant’s agent has confirmed in writing that they do not wish to duplicate the services, and due to their proximity it would not be technically viable to have both monopoles operating on all parts of the network, just to allow 5G to operate.

Two objectors and two ward Councillors have raised concerns regarding the siting of the monopole, with the objectors suggesting alternative locations. However whilst these concerns and the suggested alternative locations are noted, it is considered that for the reasons articulated above the proposed siting of the development would be acceptable at this existing telecommunications site.

## **Appearance**

The main visual impact of the proposal would be the fact that the new monopole would be relatively high at 17 metres (and so five metres higher than the existing monopole), including the unshrouded antennas at the top (unlike the existing monopole which includes shrouded antennas). However application details have confirmed that the height of the monopole is the minimum required in order to provide the 2G, 3G, 4G and 5G coverages for this area, with the upper three antennas providing the 5G coverage. This has taken into account the context of the local topography and clutter (such as manmade or natural features). 5G radio technologies operate in higher frequency bands than older technologies, and so attenuation of the radio signal is naturally higher and the effects of street clutter are greater. Therefore a higher structure is required to achieve the same coverage footprint. Antennas would be unshrouded for technical reasons (the higher frequency 5G antennas are unable to operate effectively through the Glass Reinforced Plastic that a shroud is made of). If the antennas were shielded by a shroud, then additional installations would be required elsewhere within the cell area leading to a proliferation of masts. This would be contrary to guidance within NPPF (February 2019) which clearly states in Paragraph 113 that

the number of electronic communications masts, and the sites for such installations, should be kept to a minimum.

The proposed monopole with antennas comprises the slimmest design with the lowest height possible to enable all technologies to be supported from this site. If it was lower or slimmer, additional columns and other installations would be required elsewhere. The design of the column resembles as closely as possible other existing vertical structures within the immediate area, including lighting columns.

Despite the height of the monopole, it is considered that the proposal including the equipment cabinets and associated development would be of an acceptable appearance. Evidence has been submitted demonstrating that the proposed monopole would be of the least visually intrusive design possible (slim, vertical and of the minimum required height) to enable technologies to operate efficiently due to the existing topography and clutter. The equipment cabinets would be small in scale and so would also have an acceptable visual impact. Both the monopole and equipment cabinets would be of an acceptable colour (grey). Whilst it cannot be denied that the 17 metre high monopole would have a visual impact due to its necessary height, in the context of this existing telecommunications site (positioned along a busy classified arterial road outside of a main street scene, where there are other, albeit smaller, vertical features in the vicinity (such as street lighting columns), and a number of mature trees) its appearance would not be detrimental to warrant refusal of the application.

Two objectors and two ward Councillors have raised concerns regarding the appearance of the monopole. However whilst these concerns are noted, it is considered that for the reasons articulated above the appearance of the proposal including the monopole would be acceptable at this existing telecommunications site.

### **ICNIRP declaration**

Paragraph 116 of NPPF (2019) clearly states that “*Local Planning Authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.*”

An objector has raised concerns regarding the health risks to their family and neighbours – which they state have not been proven or disproved. Whilst these concerns are noted, Paragraph 116 of NPPF (February 2019) clearly states that Local Planning Authorities should not set health safeguards different from the International Commission guidelines for public exposure.

The applicant has confirmed that the proposal conforms to current government guidelines regarding health safeguards. An ICNIRP declaration has been submitted with the application, which declares that the proposal is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) for public exposure.

### **Other Matters**

#### Current Government Position

As part of the application, the applicant’s agent has highlighted that the importance of mobile connectivity during the pandemic was reinforced by the Department of Digital Culture, Media and Sport (DCMS) in succinct advice to local authorities and operators published on 02/04/2020: ‘*Government recognises ongoing importance of the telecommunications industry at this critical time. Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.*’ The advice sets out (albeit in relation to emergency

access provision) that *'Fully operational telecommunications infrastructure is needed to support mass homeworking and critical connectivity to emergency services and hospitals. Network operators must be able to rectify network outages promptly and to mitigate any effects of network degradation over the duration of this emergency period.'*

The applicant has also highlighted the fact that the Government has produced a consultation document titled 'Government response to the consultation on proposed reforms to permitted development rights to support the deployment of 5G and extend mobile coverage'. One of the proposals is to enable existing sites to be upgraded for 5G and for mast sharing without even requiring prior approval. It is therefore possible that a proposal of this nature may not even require prior approval in the near future.

#### Re-positioning of Waymaker 'Cleadow' Road Sign

The original proposal would have been positioned whereby it would have obscured the existing stone 'Cleadow' waymaker road sign. A concern was raised in relation to this matter in a representation from the objector from 23 Ashleigh Gardens. However the applicant has agreed to re-position the 'Cleadow' waymaker road sign so that it would not be obscured by the proposal. Application drawings have been amended accordingly to illustrate this, and the Traffic and Road Safety Team (the local highway authority) have raised no objections to the proposal.

An informative to applicant is recommended to remind the applicant of that the 'Cleadow' waymaker road sign needs to be re-positioned as part of the proposed works.

#### Concerns Raised by Objector Not Addressed Above

Objectors have raised several other concerns that have not been addressed above. These are addressed as follows:

- The new monopole and cabinets would not be in addition to the existing monopole and cabinets at this location. As stated above the existing monopole and some existing cabinets would be removed.
- The objectors have stated that the submitted details misrepresent the nature of the proposed location, either intentionally or through a lack of knowledge of the local area. However this is simply the way that the applicant has sought to describe the surrounding area. Whilst this is noted, the case officer visited the application site as part of the assessment process and is fully aware of the nature of the surrounding area.
- The statement *'there are no greenfield locations immediately adjacent to the site'* is assumed to mean that there are no such sites that are available to enable the development to be constructed.
- Urban clutter is simply a term referring to any man-made features such as street lighting columns, street furniture, road signage etc.
- The objectors have raised the fact that the Cleadow Conservation Area is nearby. However it is positioned over 600 metres to the south of the application site with existing built form between. The proposal would therefore have no adverse impacts on the setting of the Cleadow Conservation Area.
- The Council has fulfilled its statutory obligation in relation to consultation as set out under Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).
- The objector from 23 Ashleigh Gardens was made aware that these type of applications are not required to be presented to Planning Committee in accordance with the Councils' Constitution. They were also made aware that the Council has only 56 days to determine the application, and if no decision is made within this 56 day period then the developer can construct the development. The next Planning Committee is after the 56 day period on 01/09/2020.



## **Summary**

For the reasons articulated above, it is considered that the siting and appearance of the proposal would be acceptable. Prior approval is required and it is recommended that it be given.

In assessing this application due regard has been had to the requirement of section 149 of the Equality Act 2010.

## **Recommendation**

Grant Permission No Conditions – Prior Approval Required and Hereby Given.

## **Conditions**

N/A

## **Informatives**

- 1 In dealing with this application the Council has implemented the requirements of the National Planning Policy Framework to seek to approve applications for sustainable development where possible.
  
- 2 ALL DEVELOPMENTS WITHIN COALFIELD STANDING ADVICE AREAS  
  
The proposed development lies within a coal mining area which may contain unrecorded coal mining related hazards. If any coal mining feature is encountered during development, this should be reported immediately to the Coal Authority on 0345 762 6848.  
  
Further information is also available on the Coal Authority website at: [www.gov.uk/government/organisations/the-coal-authority](http://www.gov.uk/government/organisations/the-coal-authority)
  
- 3 NOTE TO APPLICANT  
  
The applicant is advised that any apparatus should be removed from the land on which it is situated as soon as reasonably practicable after it is no longer required for electronic communications purposes. Such land should be restored to its condition before the development took place, or to any other condition as may be agreed in writing between the local planning authority and the developer.
  
- 4 NOTE TO APPLICANT  
  
The applicant is advised that the 'Cleadow' waymarker road sign needs to be re-positioned as part of the proposed works.

## **List of approved plans for standard note**

### **Plan Reference**

Drg No. 769681\_STY008\_74020\_SR0080\_M003 Issue 3 (002 Site Location Plan) received 06/08/2020

Drg No. 769681\_STY008\_74020\_SR0080\_M003 Issue C (100 Existing Site Plan) received 06/08/2020

Drg No. 769681\_STY008\_74020\_ST0080\_M003 Issue C (150 Existing Elevation A)  
received 06/08/2020

Drg No. 769681\_STY008\_74020\_SR0080\_M003 Issue C (215 Proposed Site Plan)  
received 06/08/2020

Drg No. 769681\_STY008\_74020\_SR0080\_M003 Issue C (265 Proposed Site Elevation)  
received 06/08/2020

**Case officer: David Rogerson**

**Signed: *David Rogerson***

**Date: 12/08/2020**

**Authorised Signatory:**

**Date:**