

Item No: 01
Case No: SDNP/17/05776/FUL
Proposal Description: Demolition of the existing public house and construction of 4.no dwelling houses with associated access, parking and landscaping
Address: The Woodman Inn, Winchester Road, Upham, SO32 1HA
Parish, or Ward if within Winchester City: Upham
Applicant's Name: Mr Richard Acton
Case Officer: Mrs Sarah Tose
Date Valid: 10 November 2017
Recommendation: Application Refused



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General Comments

This application is reported to the Planning Committee due to the number of representations that have been received contrary to the Officer's recommendation.

1 Site Description

The Woodman Inn site lies in a prominent position at the corner of Winchester Road and Upham Street in the village of Upham. The site is located within the countryside and the South Downs National Park. The vacant public house building is sited in the southern part of the site adjacent to Winchester Road, with the car park in the northern part accessed from Upham Street. Neighbouring properties adjoin the site on all sides. There are no significant level changes within the site. The site is enclosed by low closed board fencing with some planting along the eastern boundary. There are a few trees along the west and east boundaries.

The existing property is two storeys in height and constructed of brickwork, rendered and painted, with timber windows and doors and a pitched tiled roof. The site extends to approximately 0.176 hectares.

2 Proposal

The proposal seeks to demolish the existing vacant public house and outbuildings and construct four detached dwellings with associated parking and landscaping.

3 Relevant Planning History

SDNP/17/02447/PRE - Demolition of the vacant existing public house and associated outbuildings to provide four residential dwellings. STATUS: PRE 18th August 2017.

SDNP/14/03482/FUL - Additional first floor windows to side and rear; internal alterations (AMENDED DESCRIPTION) STATUS: APP 27th August 2014.

Various other old applications for minor alterations to the Public House.

4 Consultations

Parish Council Consultee

Comments: After Meeting with the Applicant Upham Parish Council still object to this application as they would still like to retain a village asset in some form e.g. a Shop. Councillors would like to see the historic building remain as it is an important landmark at the entrance to the village along the Winchester Road.

Councillors were concerned that the parking provision shown is at a minimum and there is no scope for “white van” delivery vehicles to turn on the site. This could lead to parking on Upham Street causing increased congestion. It was felt that the parking could be rearranged so that there is more scope for

turning for delivery vehicles etc. Perhaps consideration could be given to reduce the size of the properties to allow for more parking and turning. Councillors appreciated the Applicant meeting to discuss this development, but felt that this would have been more beneficial at the outset, rather than at this late stage. It was agreed that the now derelict site needs to be tidied up, and with a few amendments to the plans it was felt that this could be achieved.

WC - Drainage Engineer

No objection, subject to condition

WC - Ecologist & Biodiversity Officer

No objection, subject to condition.

WC - Winchester Highways

No objection, subject to condition.

WC - Landscape

No objection.

WC - Landscape Trees

No objection, subject to condition.

WC - Urban Design

Objection to the demolition of the Woodman Inn building which has intrinsic qualities as a product of its orientation, scale and features, which collectively contribute to its setting. The proposed design is not considered to respond positively to the character and context of its locality.

WC - Historic Environment Team

Objection to the loss of the non-designated heritage asset. The building contributes significantly to the street scene and its demolition would be detrimental to the character of the locality.

WC - Estates

No objection

5 Representations

1 representation has been received from a neighbouring property raising objections to the application for the following reasons:

- this is a prominent site that deserves a proposal which sets a high standard of design to reflect the aims of the SDNP- do not believe it succeeds in this aim
- the house on plot 1 stands in an isolated position between its driveway and the entrance to the larger parking area behind
- the south elevation of plot 1 is very blank and unattractive

- the south elevation of plot 1 will be highly visible when you turn into Upham Street from Winchester Road and does not make a positive contribution to the street scene
- UPVC windows and doors are not sympathetic to the surrounding properties and will detract from the character of the village and the SDNP
- The way flint has been used in small panels on the north elevation of Plot 1 is an unconvincing way of using the material to respond to the surroundings and as a response to the local character of the village
- cars will have to reverse from the Plot 1 drive into Upham Street close to the junction with Winchester Road

The Upham Shop Action Group raises the following objections:

- We had already looked at the possibility of setting up a shop and post office on the Woodman site whilst it was still operating as a Public House. At that time the owner and landlord were open to suggestions.
- When the business closed USAG considered purchasing the Woodman with a view to setting up a community shop.
- The site is ideally placed for a village shop, having easy access to the main Bishops Waltham to Winchester road and for village residents.
- The investment required to purchase the site and upgrade the buildings did not make commercial sense.
- A USAG member has now developed a new proposal which would include a shop/cafe, 4 smaller 3 bedroom houses, 2 x 1 bedroom flats, and 15 car parking spaces. This proposal has the huge advantage of preserving the community use of the site.
- The property has become increasingly dilapidated over the last 18 months with no effort made by the present owner to maintain it.
- USAG believes that the guide rent of £37,500 p.a. is excessive meaning that the property was not marketed at reasonable rent.

11 representations have been received supporting the application for the following reasons:

- site has become dilapidated and an eyesore
- urgently requires development to improve the image of the village
- would improve the appearance of the site
- village requires more homes
- proposal would be in keeping with the surrounding area
- would fit well into the local street scene
- would enhance the entrance to the village
- a shop or commercial use is not viable in this location
- shop/commercial redevelopment would be an overdevelopment of the site and lead to traffic problems

The following concerns/comments have been raised by a neighbour:

- the site access is close to the entrance of Laurel Cottage- concern about potential conflict with vehicles exiting onto Upham Street opposite the neighbour's drive
- proposed access will result in the loss of an existing flint wall- last remaining section of a significant historic feature

- the number of native species should be increased in the landscape planting mix
- include a condition to prevent contractors and delivery vehicles parking on Upham Street
- delivery of materials should be restricted to the working hours proposed in the application

6 **Planning Policy Context**

Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan in this area is the **Winchester District Local Plan Review (2006)** and the following additional plan(s):

- Winchester District Local Plan Part 1 Joint Core Strategy (2013)
- South Downs National Park Local Plan - Pre-Submission September 2017

Other plans considered:

- Upham Village Design Statement

The relevant policies to this application are set out in section 7, below.

National Park Purposes

The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage,
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social well being of the local community in pursuit of these purposes.

7 **Planning Policy**

Relevant Government Planning Policy and Guidance

Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued and came into effect on 27 March 2012. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 115 that great weight should be given to conserving landscape and scenic beauty in the national parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.

National Planning Policy Framework (NPPF)

The following National Planning Policy Framework documents have been considered in the assessment of this application:

- NPPF07 - Requiring good design
- NPPF11 - Conserving and enhancing the natural environment

Paragraph 2 states that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with the NPPF.

The following policies of the **Winchester District Local Plan Review (2006)** are relevant to this application:

- DP3 - General Design Criteria
- DP4 - Landscape and the Built Environment
- T2 - Development Access
- T4 - Parking Standards

The following policies of the **Winchester District Local Plan Part 1 Joint Core Strategy (2013)** are relevant to this application:

- MTRA4 - Development in the countryside
- MTRA3 - Other Settlements in the market Towns and Rural Area
- CP2 - Housing Provision and Mix
- CP6 - Local Services and Facilities
- CP11 - Sustainable Low and Zero Carbon Built Development
- CP13 - High Quality Design
- CP16 - Biodiversity
- CP19 - South Downs National Park
- CP20 - Heritage and Landscape Character

The following policies of the **South Downs National Park Local Plan - Pre-Submission September 2017** are relevant to this application:

- Strategic Policy SD4 - Landscape Character
- Strategic Policy SD5 - Design
- Strategic Policy SD8 - Dark Night Skies
- Strategic Policy SD9 - Biodiversity and Geodiversity
- Development Management Policy SD11 - Trees, Woodland and Hedgerows
- Development Management Policy SD22 - Parking Provision
- Strategic Policy SD25 - Development Strategy
- Development Management Policy SD43 - New and Existing Community Facilities

Partnership Management Plan

The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013. It sets out a Vision and long term Outcomes for the National Park, as well as 5 year Policies and a continually updated Delivery Framework. The SDPMP is a material consideration in planning applications and has some weight pending adoption of the SDNP Local Plan.

The following Policies and Outcomes are of particular relevance to this case:

- General Policy 1
- General Policy 3

The Draft South Downs National Park Local Plan

The South Downs Local Plan: Pre-Submission Local Plan was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for public consultation between 26th September to 21st November 2017. After this period, the next stage in the plan preparation will be the submission of the Local Plan for independent examination and thereafter adoption. Until this time, the Pre-Submission Local Plan is a material consideration in the assessment of this planning application in accordance with paragraph 216 of the NPPF, which confirms that weight may be given to policies in emerging plans following publication unless other material considerations indicate otherwise. Based on the current stage of preparation, along with the fact that the policies are compliant with the NPPF, the policies within the Pre-Submission Local Plan referenced are currently afforded some weight.

8 Planning Assessment

Principle of development

There are several issues to consider regarding the principle of the proposed development: the suitability of the site as an infill plot, the loss of the public house and potential alternative community uses, and the impact on the non-designated heritage asset.

Infill plot

The application site lies within the countryside where new housing is not normally permitted unless there is an essential need for it to be located there such as housing for rural workers or affordable housing to meet local needs. However, within rural villages there are opportunities for small-scale residential development where gaps exist between existing properties. Within the village of Upham, policy MTRA 3 allows for development that consists of infilling of a small site provided that it is located within a continuously developed road frontage and would be of a form compatible with the character of the village.

The application site lies in a corner position and is located between existing properties on Winchester Road and Upham Street. In this respect the site is considered to comply with policy MTRA 3 as it would be located within

continuously developed road frontages. The existing surrounding development comprises detached and semi-detached dwellings so the proposed scheme of 4 detached two storey properties would not appear out of character in terms of the type of housing proposed. There is a variety in plot sizes within the locality so the size of the proposed 4 plots is not considered to be at odds with the character of the village.

It is considered that the proposal would satisfy the requirements of policy MTRA 3 so in this respect the redevelopment of the site for residential purposes would be acceptable in principle. However, the proposal would result in the loss of the existing building which raises other issues that are discussed below.

Loss of public house/alternative community uses

LPP1 policy CP6 seeks to retain local facilities and services available across the District. Development proposals should not result in the loss of a facility unless it can be demonstrated that it is no longer needed to serve the locality and the building has no reasonable prospect of being used for an alternative service or facility which would benefit the local community.

The application is supported by a marketing report which provides details of the marketing of the site and the responses received by interested parties. The site was marketed for approximately 19 months, and has now been on the market for 2 years. Concerns have been raised by the Upham Shop Action Group regarding how the property has been marketed. The Council has sought advice from an external valuer (Fleurets) who has undertaken a robust assessment of the marketing of the Woodman Inn and concludes the following:

'I am content that the property has been fully exposed to the market, covering a broad range of sectors - public house and alternative community uses. The lack of purchaser or tenant being secured is a strong indicator of lack of demand and the reasons set out as to why this has been unsuccessful are clear indicators of the struggles that this property faces and will continue to do so going forward.'

Fleurets consider that reasons such as local competition, the building not being suitable for managed pub companies and market conditions indicate the lack of demand. Fleurets were also instructed to comment on whether or not the leasehold interest was offered at an appropriate rent and they have concluded the following:

'On balance, I consider the guide rent, particularly when taken with the incentives offered, to have been reasonable and the steps taken by the Applicant and Savills to try and secure interest and progress negotiations to have been positive and a genuine attempt to let the property.'

The Council's Estates Surveyor does not dispute the findings of the Fleurets report. It is therefore considered that sufficient evidence has been provided to

satisfy the requirements of policy CP6 by demonstrating a lack of demand for the site as a public house or an alternative community use.

Impact on the non-designated heritage asset

The existing building is considered to be a non-designated heritage asset due to its quality and the significant contribution that it makes to the streetscape. The proposed demolition of the building would therefore be detrimental to the street scene and to local character. It is also considered that the proposed demolition would be contrary to the first statutory purpose of the South Downs National Park designation which seeks 'to conserve and enhance the natural beauty, wildlife and cultural heritage' of the Park. It has not been demonstrated that the building is not capable of conversion. The principle of demolishing the building is therefore not considered acceptable and cannot be supported. This issue is discussed further in the 'heritage asset' section below.

Heritage asset

Although the existing building is not listed or located in a Conservation Area, the Historic Environment team considers the former Woodman Inn building to be a non-designated heritage asset that should be retained and converted to form a focal point of the proposed development.

The building is a solid surviving example of a late 18th/ early 19th century public house building. The historic core of the building is clearly shown on the 1843 Ordnance Survey, although looking at some of the internal brickwork it is possible that the first phase of the building dates to the late 18th century. The building was certainly built in at least two separate phases and has at some point, possibly in the early 20th century, had a whimsical Arts and Crafts style frontage added to attempt to give the main street frontage a greater degree of symmetry. Consequently, and as the Woodman Inn is located on a very prominent corner /crossroads, the building makes an important visual contribution to the streetscape along with buildings on two of the other three corners of the junction. Removing some of the unfortunate 20th century additions to the building would also enhance its appearance, further adding to its significance within the streetscape.

The Council's Urban Designer supports the retention of the Woodman Inn and considers that the building's distinctive characteristics and orientation signifies the approach to the junction, improves legibility and consequently strengthens the sense of place. Paragraph 3.51 of the Council's High Quality Places SPD states that 'where existing buildings have a positive impact on the character of the area, these should be retained wherever possible in order to preserve local distinctiveness'.

The applicant has submitted an Assessment of Significance report which concludes that the Woodman Inn is considered to be a non-designated heritage asset but it is deemed only to be of modest heritage significance. It argues that as the building has been substantially altered and extended, the original form and appearance of the pub is unrecognisable and as such it is not a high contributor to the area's character. The report also states that the

alterations required to convert the building to residential use would further reduce the significance of the building. The Council's Historic Environment team do not agree with the conclusions of this report and maintain their objection to the demolition of the non-designated heritage asset, which would be harmful to the local character of Upham and the cultural heritage of the National Park, contrary to LPP1 policy CP19, the High Quality Places SPD, paragraphs 131 and 135 of the NPPF and the first purpose of the National Park. The application is therefore recommended for refusal on this basis.

There are no historic environment objections to the principle of developing the rest of the site for residential purposes, subject to the design and materials being of high quality. This is discussed further below.

Layout and design

The siting of the proposed dwellings fronting Winchester Road and Upham Street is considered acceptable as it would continue the existing building line and reflect the existing development on the opposite side of Winchester Road.

The proposal would provide 1 x 4 bed dwelling, 2 x 3 bed dwellings and 1 x 2 bed dwelling which accords with policy CP2 that requires the majority of new dwellings to have 2 or 3 bedrooms.

The Design Statement states that each of the proposed houses have been designed as an individual bespoke response to its setting and the dwelling mix. However, the Council's Urban Designer does not consider that the scheme responds positively to the character and context of its locality. It is considered that residential development on this site should be informed by appropriate studies to ensure that it respects the existing urban grain and integrates with the character of its context while retaining the former Woodman Inn building.

It is considered that the proposed development lacks cohesion, due to the variety of architectural styles proposed. The different form and designs of each of the 4 dwellings do not relate to one another and as such the development does not create a sense of place or reinforce local distinctiveness. It is acknowledged that the proposed designs contain elements that reflect existing development in the locality, however there is no sense of rhythm between the dwellings, or elements that visually link the buildings together.

UPVC windows and doors and Eternit 'slate' are proposed in the scheme which are not considered appropriate for the rural nature of the site. There is concern that the use of flint on the north elevation of the dwelling at plot 1, by inserting flint panels into a predominantly brick elevation, could appear contrived, particularly as this material is not proposed on the south elevation. The south elevation of the dwelling would comprise a 9 metre long expanse of brick wall with one small window proposed at ground floor level. This elevation would be highly visible from the Winchester Road/ Upham Street junction and when travelling up Upham Street. For these reasons it is therefore not

considered that the dwelling at plot 1 would make a positive contribution to the character of the area.

As the site lies in a prominent corner position in a rural village within the South Downs National Park, the development must be of a high quality in terms of design and materials. In its current form the proposal is not considered to achieve this, and as such would not make a positive contribution to the character of the area. The development is therefore considered contrary to LPP1 policy CP13, saved policy DP3 and the High Quality Places SPD and is recommended for refusal on this basis.

Landscape character of the South Downs National Park

Policy CP19 requires development to be in keeping with the context and setting of the landscape of the National Park. It is considered that new residential development in this location would be in keeping with the existing character of the area, and as such would not detract from the landscape character and natural beauty of the National Park. However, the loss of the existing building which is a non-designated heritage asset is considered detrimental to the character of the local area and would conflict with the first purpose of the National Park, which seeks to conserve and enhance cultural heritage. The demolition element of the proposal is therefore considered harmful to the landscape character of the South Downs National Park.

The Council's Landscape Officer is satisfied with the submitted planting scheme so this element of the proposal is considered acceptable. The South Downs National Park is a designated International Dark Sky Reserve. If the application was being recommended for approval, details of external lighting at the site would be secured by condition to minimise light intrusion.

Highways

The Council's Highway Engineer has assessed the proposals and has raised no objections. The scheme would comply with the Council's Residential Parking Standards which require a total of 9 spaces for the development. A Typical Swept Path layout plan has been submitted for several of the vehicles that might be expected to visit the site, which demonstrates that sufficient space exists to allow satisfactory on site turning to occur. No objection has been raised to the parking arrangements for plot 2 which would be accessed separately off Upham Street. The proposal is expected to result in a reduction in traffic generation to and from the site compared to a successful pub operating there. The development is therefore not considered to have an adverse impact on highway safety.

Drainage

The site lies in flood zone 1 so no flood risk assessment is required. However, the south east corner of the site is at a medium risk of surface water flooding, so the Council's Drainage Engineer has advised that details of how this would be addressed would need to be provided. Surface water will go to soakaways which is acceptable. The application states that a septic tank will be used, however the most sustainable solution would be either individual package treatment plants to each dwelling or a shared plant with a maintenance plan

showing how it will be maintained in the future. To install a septic tank, under the NPPF the applicant will need to demonstrate why a package treatment plant cannot be provided. If the application was considered acceptable in all other respects, drainage details could be secured by condition.

Local residential amenity

It is considered that neighbouring properties are located at a sufficient distance from the proposed dwellings to not be adversely affected in terms of loss of light, privacy or overbearing impacts. The development would therefore cause no significant harm to local residential amenity.

Trees

An Arboricultural Survey and Impact Assessment report has been submitted which states that the construction of the dwelling at plot 2 will require the removal of one tree which is of moderate retention value (Category B) when considered in accordance with the guidance set out in BS5837:2012. The report concludes that the loss of this tree would not be so detrimental as to impair the overall character of the site as this tree has been previously heavily pollarded and has lost many of the supporting scaffold branches.

The construction of the dwelling at plot 4 will require the removal of a small section of a linear group of trees that provide visual separation from neighbouring properties. These trees are in a position at the end of the linear group and comprise a small element of the overall screen.

It is considered that the loss of the trees can be sufficiently mitigated against by securing replacement planting.

Ecology

The Council's Ecologist is satisfied with the recommendations proposed within the ECOSA Ecological Assessment of October 2017 in relation to bats, badgers, birds, reptiles and fencing. If the application was considered acceptable in all other respects, these recommendations could be secured by condition, together with details of bat roosting opportunities and bird nesting features to be incorporated in to the build. A lighting plan would also be required for prior approval to ensure foraging and commuting bats are not impacted by external lighting. The proposal is therefore not considered to have an adverse impact on biodiversity so would comply with policy CP16.

Sustainability standards

In March 2015 the Government announced updates to its policy on housing standards and zero carbon homes. These affect the Council's implementation of LPP1 Policy CP11. While policy CP11 remains part of the Development Plan and the Council still aspires to achieve its standards for residential development (Code for Sustainable Homes Level 5 for energy and Level 4 for water), Government advice now sets a maximum standard of 110litres/day for water efficiency and the equivalent of Code Level 4 for energy. Therefore, for applications determined after 26 March 2015, Local Plan policy CP11 will be applied in compliance with the maximum standards set out in Government

advice. These standards could have been secured by condition if the recommendation was for approval.

9 Conclusion

The loss of the non-designated heritage asset would be harmful to the character of the area and is considered unacceptable. It is not considered that the option to convert the building has been properly explored. The development would fail to respond positively to the character and context of the locality by virtue of a design that fails to be informed by, or respond positively to, the site's context. For these reasons the application cannot be supported and is recommended for refusal.

10 Reason for Recommendation

It is recommended that the application be Refused for the reasons set out below.

1. The Woodman Inn is considered to be a non-designated heritage asset which makes a positive contribution to the street scene, character of the area, and local distinctiveness. The loss of the building is therefore considered harmful to the character of the area and would not comply with the first statutory purpose of the South Downs National Park which seeks to conserve and enhance cultural heritage. The proposal is therefore considered contrary to policy CP19 of the Winchester District Local Plan Part 1- Joint Core Strategy, paragraphs 131 and 135 of the NPPF, and paragraph 3.5.1 of the High Quality Places SPD.

2. The development would fail to respond positively to the character and context of the locality by virtue of a design that fails to be informed by, or respond positively to, the site's context. The proposal is therefore considered contrary to policy CP13 of the Winchester District Local Plan Part 1- Joint Core Strategy, policy DP3 of the Winchester District Local Plan Review, Section 7 of the NPPF and the High Quality Places SPD.

11. Crime and Disorder Implications

11.1 It is considered that the proposal does not raise any crime and disorder implications.

12. Human Rights Implications

12.1 This planning application has been considered in light of statute and case law and any interference with an individual's human rights is considered to be proportionate to the aims sought to be realised.

13. Equality Act 2010

- 13.1 Due regard has been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010.

14. Proactive Working

The Officers' concerns have been discussed with the applicant's agent and a meeting has been held with the applicant, agent and architect to discuss the issues. Regrettably a positive outcome was unable to be achieved in this case.

Plans Referred to in Consideration of this Application

The application has been assessed and recommendation is made on the basis of the following plans and documents submitted:

Plan Type	Reference	Version	Date on Plan	Status
Plans - AUTOTRACK SWEPT PATHS	5881.002		09.11.2017	Not approved
Plans - LANDSCAPE PROPOSALS PLAN	DD174L01	A	24.01.2018	Not approved
Plans - PLAN 1 - SITE LOCATION AND WIDER CONTEXT	DD174PL 1		09.11.2017	Not approved
Plans - LANDSCAPE OPPORTUNITIES PLAN	DD174SK01		09.11.2017	Not approved
Plans - LOCATION PLAN	L01		09.11.2017	Not approved
Plans - EXISTING BLOCK PLAN	P01		09.11.2017	Not approved
Plans - PROPOSED SITE PLAN	P02		09.11.2017	Not approved
Plans - PROPOSED BLOCK AND ROOF PLAN	P03		09.11.2017	Not approved
Plans - EXISTING & PROPOSED SITE ELEVATIONS	P04		09.11.2017	Not approved
Plans - EXISTING & PROPOSED SITE ELEVATIONS	P05		09.11.2017	Not approved

Plans - EXISTING & PROPOSED SITE SECTION A:A	P06	A	20.03.2018	Not approved
Plans - PLOT 1 PLANS	P11	A	20.03.2018	Not approved
Plans - PLOT 1 ELEVATIONS	P12	A	20.03.2018	Not approved
Plans - PLOT 2 PLANS	P13		09.11.2017	Not approved
Plans - PLOT 2 ELEVATIONS	P14		09.11.2017	Not approved
Plans - PLOT 3 PLANS	P15		09.11.2017	Not approved
Plans - PLOT 3 ELEVATIONS	P16		09.11.2017	Not approved
Plans - PLOT 4 PLANS	P17		09.11.2017	Not approved
Plans - PLOT 4 ELEVATIONS	P18		09.11.2017	Not approved