

# Public Document Pack



## **SOUTH HAMS LICENSING SUB-COMMITTEE - THURSDAY, 2ND APRIL, 2015**

Agenda, Reports and Minutes for the meeting

| <b>Agenda No</b> | <b>Item</b> |
|------------------|-------------|
|------------------|-------------|

|    |   |
|----|---|
| 1. | <b><u>Agenda Letter</u></b> (Pages 1 - 2) |
|----|---|

|    |                       |
|----|-----------------------|
| 2. | <b><u>Reports</u></b> |
|----|-----------------------|

Reports to Licensing Sub Committee:

|    |   |
|----|---|
| a) | <u>Totnes Cinema, 27A High Street, Totnes, TQ9 5NP</u> (Pages 3 - 14) |
|----|---|

|    |                                       |
|----|---------------------------------------|
| 3. | <b><u>Minutes</u></b> (Pages 15 - 18) |
|----|---------------------------------------|

**This page is intentionally left blank**

# Agenda Item 1

Please reply to: Darryl White  
Service: Corporate Services  
Direct Telephone: 01803 861247  
E-Mail: [darryl.white@southhams.gov.uk](mailto:darryl.white@southhams.gov.uk)

To: Members of the Licensing Sub-Committee  
(Cllrs Baverstock, Gilbert and Wright)

Our Ref: CS/DW

25 March 2015

Usual Officer and Press Circulation and local Ward Members

Dear Councillor

A meeting of the **Licensing Sub-Committee** will be held in the **Cary Room**, Follaton House, Plymouth Road, Totnes on **Thursday 2 April 2015 at 11.30 am** when your attendance is requested.

Yours sincerely

Kathryn Trant  
Member Services Manager

|   |
|---|
| <p><b>FOR ANY QUERIES ON THIS AGENDA, PLEASE CONTACT DARRYL WHITE<br/>DEMOCRATIC SERVICES MANAGER ON DIRECT LINE 01803 861247</b></p> |
|---|

## A G E N D A

1. **Appointment of Chairman;**
2. **Division of Agenda** - to consider whether the discussion of any item of business is likely to lead to the disclosure of exempt information;
3. **Declarations of Interest** - Members are invited to declare any personal or disclosable pecuniary interests, including the nature and extent of such interests; they may have in any items to be considered at this meeting;
4. **To determine an application for a new Premises Licence at Totnes Cinema, 27A High Street, Totnes, TQ9 5NP. Activities to include provision of films and sale of alcohol (pages 1 to 47).**

**Members of the public may wish to note that the Council's meeting rooms are accessible by wheelchairs and have a loop induction hearing system**

**MEMBERS ARE REQUESTED TO SIGN THE ATTENDANCE REGISTER**

**THIS AGENDA HAS BEEN PRINTED ON ENVIRONMENTALLY FRIENDLY PAPER**

If you or someone you know would like this publication in a different format, such as large print or a language other than English, please call Darryl White on 01803 861247 or by email at: [darryl.white@southhams.gov.uk](mailto:darryl.white@southhams.gov.uk)

**This page is intentionally left blank**

AGENDA  
ITEM

AGENDA  
ITEM

## SOUTH HAMS DISTRICT COUNCIL

|                          |  |
|--------------------------|--|
| <b>NAME OF COMMITTEE</b> | Licensing Sub-Committee                |
| <b>DATE</b>              | 2 April 2015                           |
| <b>REPORT TITLE</b>      | Application for a new Premises Licence |
| <b>REPORT OF</b>         | The Licensing Officer                  |
| <b>WARDS AFFECTED</b>    | Totnes Town                            |

---

### Summary of report:

To determine an application for a new Premises Licence at **Totnes Cinema, 27A High Street, Totnes, TQ9 5NP**, in accordance with Section 18 of the Licensing Act 2003.

### Financial implications:

There are no direct financial implications to the Council from this Report.

### RECOMMENDATIONS:

**That the Sub-Committee consider the application for a new Premises Licence and make a determination in respect of this application, namely to:**

- i grant the application as submitted, subject to any Mandatory Conditions required;**
- ii modify the conditions of the licence;**
- iii exclude any of the licensable activities to which the application relates;**
- iv refuse to specify a person in the licence as the premises supervisor;**
- v reject the application**

**in line with the licensing objectives (Section 4) contained within the Licensing Act 2003.**

### Officer contact:

Naomi Wopling

[naomi.wopling@southhams.gov.uk](mailto:naomi.wopling@southhams.gov.uk)

01803 861336

---

## 1. BACKGROUND

1.1 The Licensing Authority received an application for a new premises licence on 10 February 2015 from Totnes Cinema CIC for **Totnes Cinema, 27A High Street, Totnes, TQ9 5NP**. A copy of the application is attached (**Appendix 'A'**).

1.2 The application is for the provision of films and the sale of alcohol during the following hours:

| Activity        | Days                                   | Times  |
|-----------------|--|--|
| Films           | Monday to Friday<br>Saturday<br>Sunday | 10am to 11pm<br>9.30am to 11pm<br>10.30am to 10pm          |
| Sale of Alcohol | Monday to Friday<br>Saturday<br>Sunday | 12pm to 11pm<br>11am to 11pm<br>12pm to 10pm               |
| Opening         | Monday to Friday<br>Saturday<br>Sunday | 10am to 11.30pm<br>9.30am to 11.30pm<br>10.30am to 10.30pm |

1.3 In addition to the above hours, the applicant has requested the provision of films and supply of alcohol until 2am on the following five occasions: New Year's Eve; Cinema Opening Anniversary (Saturday closest to 4<sup>th</sup> October); Halloween (31<sup>st</sup> October); BAFTA Night (Saturday night usually around 8<sup>th</sup> February); Academy Awards Night (Saturday night usually around 22<sup>nd</sup> February). Closing times to be 2.30am on these special occasions.

1.4 The premises is intended to be used primarily as a cinema, but the applicant would also like the opportunity to use the venue occasionally for other purposes which do not require a licence, such as poetry reading, presentations and music (amplified music would not require a licence between 8am and 11pm providing sale of alcohol for consumption on the premises was permitted).

1.5 Two relevant representations were received during the consultation period, one of which has now been withdrawn. The remaining representation from a nearby resident is provided in **Appendix 'B'**. You will see that the main concerns relate to the potential for a public nuisance being caused, particularly by a large number of customers leaving the premises at night after attending a film showing and noise from deliveries and collections early in the morning.

1.6 The premises is located through an undercover passageway leading from the High Street, in the building previously used as Totnes Library and is in close proximity to residential properties (see plan in **Appendix 'C'**). The person who has made a representation lives in a property opposite the premises.

- 1.7 The applicant has provided us with further information about his intentions for the premises and has provisionally agreed to make some amendments to the application to address the concerns raised in the representation. This information is in **Appendix 'D'**.
- 1.8 We have attempted to mediate between parties, but a satisfactory conclusion has not been possible.

**(Please note that due to the amount of paperwork contained within these appendices, full copies have only been circulated to the Sub-committee Members. Anybody who would like to receive full (or part) copies are asked to contact Member Support Services on (01803) 861273.)**

## **2. ISSUES FOR CONSIDERATION**

- 2.1 One relevant representation has been received (one previously submitted has been withdrawn).
- 2.2 Issues raised in the representation relate to the potential for a public nuisance being caused due to noise from customers leaving the premises late at night and from deliveries and collections early in the morning.
- 2.3 To give a better idea of the situation of the premises a location map can be found in **Appendix 'C'**.
- 2.4 The applicant has proposed changes to his application to address the concerns of the residents, these are in **Appendix 'D'**.
- 2.5 The Sub Committee will now need to consider this application.

## **3. STATUTORY BODIES' RESPONSE**

- 3.1 Devon & Cornwall Constabulary  
No representations have been received.
- 3.2 Devon & Somerset Fire & Rescue Service  
No representations have been received.
- 3.3 Area Child Protection Committee and Local Safeguarding Children Board  
No representations have been received.
- 3.4 Devon Trading Standards  
No representations have been received.

- 3.5 South Hams District Council, Environmental Health Department (Pollution)  
No representations have been received.
- 3.6 South Hams District Council, Environmental Health Department (Health & Safety)  
No representations have been received.
- 3.7 South Hams District Council, Planning Department  
No representations have been received.
- 3.8 Primary Care Trust/Local Health Boards, Devon Drug and Alcohol Action Team  
No representations have been received.

#### **4. RELEVANT LICENSING POLICY CONSIDERATIONS**

##### **Licensing Objectives**

- 4.1 Section 2.1 of the Policy states: The Licensing Authority has a duty under the Act to carry out its licensing functions with a view to promoting the four licensing objectives. (These objectives are the only matters to be taken into account in determining the application and any conditions attached must be appropriate to achieve the licensing objectives).
- 4.2 Section 2.2 of the Policy states: A licence will only be granted where the Licensing Authority is satisfied that these objectives have been met.
- 4.3 Section 2.3 of the Policy lists the kind of measures the Licensing Authority will be expecting to see taken into account to promote the objectives.

##### **Conditions**

- 4.4 Sections 2.5 & 2.6 of the Policy sets out additional legislation, strategies, policies and guidance to which the Licensing Authority will have regard. Section 4 of the policy sets out what the Sub-Committee should consider before imposing conditions on a licence.
- 4.5 The Guidance issued under Section 182 of the Licensing Act 2003 which was revised and re-published in October 2014 state:
- 4.6 The Licensing Authority may not impose conditions unless its discretion has been engaged following receipt of relevant representations and it is satisfied as a result of a hearing (unless all parties agree a hearing is not necessary) that it is appropriate to impose conditions to promote one or more of the four licensing objectives (paragraph 10.8 of the guidance).



- 4.7 Where applications have given rise to representations, any appropriate conditions should normally focus on the most sensitive periods. In certain circumstances, conditions relating to noise immediately surrounding the premises may also prove appropriate to address any disturbance anticipated as customers enter and leave (paragraph 2.22 of guidance).

### **Licensing Hours**

- 4.8 Section 6.1 & 6.2 of the Policy states: The Licensing Authority will deal with the issue of licensing hours on the individual merits of each application. When the Authority's discretion is engaged, consideration will be given to the individual merits of an application but the presumption will be to grant the hours requested unless there are objections to those hours raised by Responsible Authorities or other persons on the basis of the licensing objectives. However, when dealing with licensing hours beyond midnight it is more likely that relevant representations will be made unless there are higher standards of control within operating schedules to promote the licensing objectives, especially for premises which are situated near residential areas or in areas where anti-social disorder takes place.

There is no presumption within the legislation for longer opening hours.

- 4.9 Section 6.5 of the Policy states: The terminal hours will normally be approved where the Applicant can show that the proposal would not adversely affect the licensing objectives unless, after hearing relevant representation the Licensing Authority believe it necessary, proportionate and reasonable to restrict the hours required. The Licensing Authority may set an earlier terminal hour where it considers this is appropriate to the nature of the activities and the amenity of the area.
- 4.10 Paragraph 10.14 of Guidance issued under Section 182 of the Licensing Act 2003 states: where there are objections to an application to extend the hours during which licensable activities are to be carried on and the licensing authority determines that this would undermine the licensing objectives, it may reject the application or grant it with appropriate conditions and/or different hours from those requested.
- 4.11 Paragraph 10.15 of Guidance issued under Section 182 of the Licensing Act 2003 states: shops, stores and supermarkets should normally be free to provide sales of alcohol for consumption off the premises at any times when the retail outlet is open for shopping unless there are good reasons, based on the licensing objectives, for restricting those hours

### **Children**

- 4.11 Section 7.1 of the Policy states: The Licensing Authority recognises the great variety of premises for which licences may be sought. These will include

theatres, cinemas, restaurants, pubs, nightclubs, cafes, takeaways, community halls and schools. Access by children to all types of premises will not be limited unless it is considered necessary to do so in order to protect them from harm.

4.12 Section 7.2 of the Policy states: When deciding whether or not to limit access to children the Licensing Authority will judge each application on its own individual merits. Examples which may give rise to concern and warrant restrictions in the operating schedule include premises: -

- where entertainment of an adult or sexual nature is provided
- where there is a strong element of gambling taking place
- with a known association with drug taking or dealing
- where there have been convictions of the current management for serving alcohol to minors
- with a reputation for allowing underage drinking
- where the supply of alcohol for consumption on the premises is exclusive or primary purpose of the services provided at the premises.

## 5. LEGAL IMPLICATIONS

5.1 The Act requires mandatory conditions to be imposed (if applicable) on the licence, the wording of which is prescribed by the Act but may be summarised as follows (those relating to on-sales premises only have been omitted):

**(a) Section 19 - Mandatory conditions relating to the supply of alcohol**

No alcohol may be supplied unless there is a Designated Premises Supervisor who also holds a personal licence.

Every supply of alcohol under a premises licence must be made or authorised by a personal licence holder.

**(b) Section 19A - Irresponsible drinks promotions**

Staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises.

**(c) Section 19A - No alcohol to be dispensed directly into the mouth of another person**

No alcohol is dispensed directly by one person into the mouth of another

**(d) Section 19A - Free drinking water**

That free tap water is provided on request to customers where it is reasonably available.

**(e) Section 19A - Age verification policy**

- (1) The premises licence holder or club premises certificate holder shall ensure that an age verification policy applies to the premises in relation to the sale or supply of alcohol.

- (2) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and a holographic mark.

**(f) Section 19A - Minimum measures for alcoholic beverages**

The responsible person shall ensure that-

(a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures-

- (i) beer or cider: ½ pint;
- (ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and
- (iii) still wine in a glass: 125 ml; and

(b) customers are made aware of the availability of these measures.

**(g) Section 19A – Minimum permitted price for the sale or supply of alcohol**

(1) A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

(2) For the purposes of the condition set out in paragraph 1—

(a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979(a);

(b) “permitted price” is the price found by applying the formula—

$$P = D + (D \times V)$$

where—

- (i) P is the permitted price,
- (ii) D is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and
- (iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

(c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence—

- (i) the holder of the premises licence,
- (ii) the designated premises supervisor (if any) in respect of such a licence, or

(iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;

(d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994(b).

**(h) Section 20 - Mandatory condition relating to exhibition of films**

Children may only be admitted to films in accordance with the classification recommendations of the British Board of Film Classification, or as recommended by the Licensing Authority.

**(i) Section 21 - Door Supervision**

Where door supervisors are specified by condition, those individuals must be licensed by the SIA.

- 5.2 As there have been relevant representations in respect of this application which have not been resolved, this hearing must be held. (Relevant representations are about the likely effect of the grant of the application on the promotion of the licensing objectives, responsible authorities or any other person). The sub-committee must disregard any information or evidence not relevant to the licensing objectives.
- 5.3 The sub-committee must consider this application in accordance with Section 4 of the Licensing Act 2003, which requires that licensing functions must be carried out with a view to promoting the four licensing objectives. The Licensing Authority must also have regard to its own licensing policy and the Secretary of State’s guidance, but may depart from both if it has good reason to do so. Those reasons should be stated.
- 5.4 The Act requires (Section 18) that in dealing with a new application, the committee takes any of the following steps which are appropriate for the promotion of the licensing objectives:
- (a) To grant the Licence subject to:-
    - i any Mandatory Conditions required;
    - ii modifying the conditions which have been specified in the operating schedule;
  - (b) to exclude any of the licensable activities to which the application relates;
  - (c) to refuse to specify a person in the licence as the premises supervisor;
  - (d) to reject the application

The Sub-Committee must give its reasons for its decision to take any of these steps. Similarly, if the application is rejected, the Sub-Committee must give its reasons.

- 5.5 The Sub-Committee will need to consider the hours of operation proposed, the effectiveness of the operating schedule proposed by the applicant, the representations received, the location of the premises in relation to residential properties, the history of the management of the premises, the evidence produced of any problems in the past, and the likely impact of any extension of hours and activities, public transport, taxi availability, the right the applicant has to operate a business and balancing the rights of residents to the quiet enjoyment and privacy of family life. The South Hams relies on tourism, with the population in the district doubling in the Summer months with holidaymakers both from this country and international visitors who are, in the main, families with young children and retired people – the very segment of society who would perhaps be deterred by anti-social behaviour. These issues, and any other relevant ones, may be explored at the hearing in so far as it reflects the four licensing objectives.
- 5.6 If the Sub-Committee rejects the application, or modifies the conditions of the licence, the applicant or any person who made relevant representation in relation to the application may appeal within 21 days of notification of the decision to the Magistrates' Court. Those making relevant representations may also appeal if they believe that the licence should not have been varied, or that, when varying the licence, the Licensing Authority ought not to have modified the conditions, or ought to have modified them in a different way. The Magistrates' Court may dismiss the appeal, or substitute its own decision, or send back the case to the Licensing Authority with directions as to how the case is to be dealt with. The Magistrates' Court may make any costs order it thinks fit.
- 5.7 If extended hours/licensable activities are granted, the Licensing Act contains review provisions which enable a responsible authority or any other person to apply to this Licensing Authority for a review of the licence. A hearing follows which enables the Sub-Committee to use the normal powers at a hearing (set out above) but also to suspend the licence for a period of up to three months or to revoke it.


## **6. FINANCIAL IMPLICATIONS**

- 6.1 There are no direct financial implications to the Council from this Report.

## 7. RISK MANAGEMENT

|   |  |
|---|--|
| <b>Corporate priorities engaged:</b>                | There is a link to the Council's priorities of improving Community Life and developing the local Economy.  |
| <b>Statutory powers:</b>                            | Licensing Act 2003   |
| <b>Considerations of equality and human rights:</b> | Compliance with the Human Rights Act 1998 – Article 6: Right to a fair hearing   |
| <b>Biodiversity considerations:</b>                 | Not applicable   |
| <b>Sustainability considerations:</b>               | As above under corporate priorities engaged  |
| <b>Crime and disorder implications:</b>             | Section 17 of Crime and Disorder Act 1998 applies.   |
| <b>Background papers:</b>                           | <p>Responses to Notices of Hearing</p> <p>Summary of Key Points</p> <p>Guidance on Meeting the Licensing Objectives</p> <p>The Licensing Act 2003</p> <p>Guidance issued under Section 182 of the Licensing Act 2003</p> <p>The District Council's Statement of Licensing Policy</p> |
| <b>Appendices attached:</b>                         | <p>Appendix A – Application for a new premises licence</p> <p>Appendix B – Representation</p> <p>Appendix C – Location map</p> <p>Appendix D – Additional information from applicant with proposed amendments</p>  |

## STRATEGIC RISKS TEMPLATE

| No | Risk Title   | Risk/Opportunity Description  | Inherent risk status       |                            |   | Mitigating & Management actions  | Ownership                                |
|----|--|---|----------------------------|----------------------------|---|--|--|
|    |  |   | Impact of negative outcome | Chance of negative outcome | Risk score and direction of travel  |  |  |
| 1  | Ensuring the Licensing Objectives are not undermined | <p>To review the application in line with:<br/>The Licensing Act;<br/>National Guidance issued by the Secretary of State, and<br/>The South Hams District Council Statement of Licensing Policy.</p> <p>To create an increased opportunity for employment in the district.</p> <p>An opportunity to maintain the districts distinctive environment whilst enabling access and sensitive development.</p> <p>To consider whether the proposal would promote tourism. The</p> | 3                          | 2                          | 6  | <p>To be able to give consideration to representations in line with the Licensing Objectives, namely:-</p> <p>The prevention of Crime and Disorder;<br/>Public Safety;<br/>The prevention of public nuisance;<br/>and<br/>The Protection of children from harm.</p> <p>The Licensing Authority follows strict legislation in accordance with the Licensing Act 2003 and adheres to the statutory instruments contained within the Act.</p> | EH Business Support / Licensing Manager. |

| No      | Risk Title | Risk/Opportunity Description   | Inherent risk status       |                            |                                    | Mitigating & Management actions | Ownership |
|---------|------------|--|----------------------------|----------------------------|------------------------------------|---------------------------------|-----------|
|         |            |  | Impact of negative outcome | Chance of negative outcome | Risk score and direction of travel |                                 |           |
| Page 14 |            | <p>population doubles in the summer months with tourists and international visitors who are, in the main, families with young children and retired people – the very segments of society who would perhaps be deterred by anti-social behaviour.</p> <p>Failure to adequately consider these issues could result in the Council facing an appeal to the Magistrates Court.</p> |                            |                            |                                    |                                 |           |

Direction of travel symbols ↓ ↑ ⇄



## MINUTES OF A MEETING OF THE LICENSING SUB-COMMITTEE HELD AT FOLLATON HOUSE, TOTNES ON THURSDAY 2 APRIL 2015

**Present:** Cllrs John Baverstock, Rufus Gilbert and Simon Wright  
Sue Nightingale, Solicitor  
Kathy Trant, Member Services Manager  
Naomi Wopling, Licensing Officer

**Members also in attendance:**

Cllr Robert Vint (not participating)

**Also in attendance and participating:**

Mr D Hughes – Representing the Applicant  
Mr J Oates – Resident

LSC.12/14 **APPOINTMENT OF CHAIRMAN**

**RESOLVED**

That Cllr Baverstock be appointed Chairman for the duration of the meeting.

LSC.13/14 **DECLARATIONS OF INTEREST**

Members and officers were invited to declare any interests in the items of business to be considered during the course of the meeting but none were made.

LSC.14/14 **TO DETERMINE AN APPLICATION FOR A NEW PREMISES LICENCE AT TOTNES CINEMA, 27a HIGH STREET, TOTNES, TQ9 5NP**

The Committee considered a report that sought to determine a new Premises Licence at Totnes Cinema, 27a High Street, Totnes.

The Licensing Officer proceeded to present the application and the contents of her report. The Chairman summarised the main issues for consideration as the time of the venue closing and the time for alcohol to cease to be served.

**1. Address by Mr Oates, Resident**

In his address, Mr Oates made particular reference to:-

- The difficulty of noise nuisance within Totnes High Street and how closing half an hour earlier would make a real difference
- Other cinema listings had been considered and he felt an earlier start time and corresponding closing time would still make the venture viable
- He felt there was a great deal of support for the cinema in Totnes, and he himself was in favour of it if appropriate conditions could be agreed

- There was already an issue of how deliveries and collections were made throughout the High Street as this was not currently regulated so this application presented an opportunity to confirm delivery and collection times.

## **2. Address by Mr Hughes, Representing the Applicant**

In his address Mr Hughes confirmed that the closing time requested of 11.00pm was critical to the viability of the cinema and if this was not granted then there would be no cinema.

## **3. Discussion**

The Committee asked a number of questions relating to the timings. The Licensing Officer confirmed that the Applicant had advised her he wanted an 11pm closing time for flexibility and to accommodate two showings of a film during the evening, therefore making the cinema viable. Mr Hughes confirmed that this flexibility was required, Mr Oates appreciated the need for flexibility but also asked that the Committee consider the need to safeguard the residents.

(At 11.55am, the Sub-Committee adjourned in the presence of Mrs Nightingale to consider the application and reconvened at 12.10pm).

## **4. The Decision**

The Chairman read out the following statement:

“We have considered the application for a new premises licence at Totnes Cinema, 27a High Street, Totnes.

We have considered the Statement of Licensing Policy, the government guidance and our obligations that relate to the promotion of the licensing objectives.

We have read carefully the written representations received from parties not present today and have read carefully representations received from parties present plus additional statements from persons here today. We have also considered the conditions and amendments proposed by the applicant and those suggested by the local resident.

It is our decision to GRANT the Application, subject to the additional conditions and amendments to the application proposed by the Applicant in advance of the hearing.

We have determined the changes to be appropriate to achieve the licensing objectives. In addition to being appropriate, the Committee also believe the amendments to be necessary.

Thank you all”.



**This page is intentionally left blank**