

## LICENSING SUB-COMMITTEE B – 4 DECEMBER 2023

### APPLICATION FOR A PREMISES LICENCE – BRAZIL TROPICAL, 56 CHERTSEY ROAD, WOKING

#### Executive Summary

This report considers an application for a Premises Licence (PL) for the above premises.

#### Recommendations

The Committee is requested to:

**RESOLVE THAT** the report be considered and identify what steps, if any, need to be taken to determine the application having regards to the four licensing objectives.

**The Sub-Committee has the authority to determine the above recommendation.**

#### Background Papers:

Application form  
Operating Schedule  
Representations from Statutory Bodies and Interested Parties  
Sustainability Impact Assessment  
Equalities Impact Assessment

#### Appendices

- 1 - Premises Location (page 21)
- 2 - Operating Schedule (page 23)
- 3 - Premises Plan (page 41)
- 3a - Rear of the premises Photos (page 43)
- 4 - Cumulative Impact Zone Policy Information (page 45)
- 4b - Local Premises Summary (page 57)
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- 6 - Public Objections (page 65)
- 7 - Local Authority Objections (page 73)
- 8 - Applicant Negotiation and responses (page 77)
- 8b - Env Health Historic Noise issues (page 79)
- 8c - Env Health Noise Issue letter (page 81)
- 9 - Councillors Handbook (reference) (page 85)
- 10 - Pool of Conditions (reference) (page 135)

#### Reporting Person:

Matthew Cobb, Senior Licensing Officer  
Ext. 3650, E Mail: Matthew.Cobb@woking.gov.uk

#### Contact Person:

Matthew Cobb, Senior Licensing Officer  
Ext. 3650, E Mail: Matthew.Cobb@woking.gov.uk

**Application for a Premises Licence – Brazil Tropical, 56 Chertsey Road, Woking**

**Date Published:**

23 November 2023

# Application for a Premises Licence – Brazil Tropical, 56 Chertsey Road, Woking

## 1.0 Summary of Proposal

**Application Type:** New Premises Licence

**Variation:** No

**Site Address:** 56 Chertsey Road, Woking, Surrey, GU21 5BG

**Applicant** Mr Manuel Rocha of 'Rochaconsultancy' Unit 35 Battersea Business Centre, 99-109 Lavender Hill, London, SW11 5QL

*on behalf of*

Brazil Tropical Ltd , 3rd Floor, Office 5, 21 Knightsbridge, London, SW1X 7LY

**Application Ref:** 23/00241/PREMIS

## 2.0 Description of Premises

2.1 The premises is proposed to be a Café and Tapas snack bar.

## 3.0 Details of Proposal and Operating Schedule

3.1 The application seeks to license the premises for the sale of alcohol for consumption on and off the premises.

- Monday to Sunday 11:00 - 23:00

## 4.0 Promotion of Licensing Objectives

4.1 Each application will be given individual consideration on its merit. Nothing in the Licensing policy shall undermine the right of any individual to apply under the terms of the Act for a variety of permissions and to have any such application considered on its individual merits. Similarly, nothing in the Licensing policy shall override the right of any person to make representations on an application or seek a review of a licence where provision has been made for them to do so in the Act.

4.2 The Sub-Committee is obliged to determine this application with a view to promoting the licensing objectives which are:

- The prevention of crime and disorder;
- Public safety;
- The prevention of public nuisance;
- The protection of children from harm.

4.3 The operating schedule submitted in the application form, which is attached in Appendix 2, shows a list of proposed conditions that the applicant has put forward to describe the steps they intend to take to promote the four licensing objectives.

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### 5.0 Relevant Representations

5.1 The following representations have been received in relation to the application:

#### Responsible Authorities

|                                 |                                       |
|---------------------------------|---------------------------------------|
| Surrey Police:                  | No objections have been received.     |
| Surrey Fire and Rescue Service: | No objections have been received.     |
| Environmental Health (WBC):     | <b>An objection has been received</b> |
| Planning Authority (WBC):       | No objections have been received.     |
| Social Services (SCC):          | No objections have been received.     |
| Trading Standards:              | No objections have been received.     |
| Public Health:                  | No objections have been received.     |
| Home Office Immigration Dept:   | No objections have been received.     |

#### Interested Parties

|                             |   |
|-----------------------------|---|
| Members of Public:          | <b>Eight objections have been received.</b> |
| Woking CCTV                 | <b>An objection has been received.</b>      |
| Woking Community Safety     | <b>An objection has been received</b>       |
| Woking Planning Enforcement | <b>A representation has been received</b>   |

5.2 The representations received object to the application on the grounds of the prevention of public nuisance, public safety, prevention of crime and disorder and the protection of children from harm.

5.3 The majority of the public representations received are from residents of Enterprise Place, a residential dwelling located close to the premises.

5.4 The Planning Enforcement representation does not deal with a Licensing Objective, but should be included as the proposed application could, if granted, result in a breach of planning conditions.

### 6.0 Policy Considerations

6.1 In making its decision, the Sub-Committee is obliged to have regard to National Guidance issued under section 182 of the Licensing Act 2003 and the Council's own Licensing Policy. The Sub-Committee must also have regard to all of the representations made and the supporting information presented by all parties.

6.2 The Licensing Officer highlights the following relevant sections taken from the '**Licensing Policy for Woking Borough**' should be considered as part of this application.

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|            |   |
|------------|---|
| <b>6.0</b> | <b>Fundamental Principles</b>   |
| 6.3        | The Council recognises that public houses, nightclubs, restaurants, hotels, theatres, private members clubs, concert halls and cinemas all sell alcohol, serve food and provide entertainment, but with contrasting styles and characteristics. In considering applications, regard will be given to those differences and the differing impact these will have on the local community.   |
| 6.4        | The Council can only attach conditions to licences where necessary to ensure the licensing objectives are served and may include conditions drawn from the Pool of Conditions relating to the licensing objectives contained in the guidance issued under the Act. When considering conditions, the Council will focus on the direct impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activity in the area concerned and those matters which are within the control of the applicant on the premises and in the vicinity of those premises. Whether or not incidents can be regarded as in the vicinity of licensed premises is a question of fact and will depend upon the particular circumstances of the case. |
| 6.6        | The Council acknowledges that licensing law is not the primary mechanism for the general control of anti-social behaviour by individuals once they are away from the premises and beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned.  |
| <b>7.0</b> | <b>The Licensing Objectives (Prevention of Crime and Disorder)</b>  |
| 7.1        | The Council will carry out its licensing functions with a view to promoting the prevention of crime and disorder and will seek to ensure that licensees take measures to regulate the behaviour of persons whilst on their premises, or in the immediate vicinity of the premises as they seek to enter or leave.   |
| 7.2        | In addition to the requirement for the Council to promote this licensing objective, it also has a duty under Section 17 of the Crime and Disorder Act 1998 to exercise its functions with due regard to the likely effect of the exercise of those functions on, and to do all it reasonably can to prevent, crime and disorder in the Borough.   |
| <b>8.0</b> | <b>The Licensing Objectives (Public Safety)</b>   |
| 8.1        | The Council will carry out its licensing functions with a view to promoting public safety and will seek to ensure that licensees take measures to protect the safety of performers and persons attending licensable activities. The risk to public safety will vary according to the type of premises and the activities carried out.   |
| <b>9.0</b> | <b>The Licensing Objectives (Prevention of Public Nuisance)</b>   |
| 9.1        | The Council will carry out its licensing functions with a view to promoting the prevention of public nuisance and will seek to ensure that licensees take measures to minimise the impact of licensable activities at their premises on people living, working or sleeping in the vicinity. The prevention of public nuisance can include low-level nuisance affecting a few people living locally, as well as major disturbance affecting the whole community.   |

6.3 The Sub-Committee must take such of the following steps as it considers necessary for the promotion of the licensing objectives:

i) Grant the licence subject to:-

(a) the conditions consistent with the operating schedule modified to the extent that the authority considers appropriate for the promotion of the licensing objectives, and

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- (b) the mandatory conditions under sections 19, 20 and 21 of the Licensing Act 2003
  - ii) Modify the conditions of the licence, by altering, removing or adding to them.
  - iii) Reject the whole or part of the application.
- 6.4 Should the Committee decide to override national and local policy then it should provide clear and detailed reasons what the 'exceptional circumstance' is that would allow us to depart from the policy.
- 6.5 The Sub-Committee is asked to note that it may not modify the conditions or reject the whole or part of the application merely because it considers it desirable to do so. It must actually be necessary in order to promote the licensing objectives.

### **7.0 Premises Location**

- 7.1 The Premises in question is a small premises located at 56 Chertsey Road in Woking Town Centre.
- 7.2 The premises is a two-storey business totalling around 81.26m<sup>2</sup>, of which 49.16m<sup>2</sup> is listed as Ground floor retail zone, and 31.1m<sup>2</sup> is listed as first floor internal storage – though the plan provided as part of the application suggests that this VOA rating is incorrect, as the first floor area is clearly not internal storage – but being used as a retail/restaurant area.
- 7.3 A map showing the location of the premises is attached as Appendix 1.

### **8.0 Site History**

- 8.1 Prior to the refitting of 56 Chertsey Road, the premises in question was a small company called "ibuywargames" who specialised in selling model figures (similar to Warhammer, miniatures for tabletop gaming).
- 8.2 "ibuywargames" also held the occasional tabletop gaming events at the premises and so applied for a premises licence so that they could sell alcohol to their clientele.
- 8.3 The premises was licenced to sell alcohol from 12:00 midday through to 22:00, for consumption on the premises only.
- 8.4 The Licence was held from February 2017 until March 2019, when the shop closed down and the licence surrendered.

### **9.0 Previous "Office Bar" Application**

- 9.1 In June 2022, Manual Rocha applied for a premises licence for "Office Bar" at 56 Chertsey Road, Woking, on behalf of Office Bar Ltd. Mr Rocha is the same agent acting on behalf of the current application for Brazil Tropical Ltd.
- 9.2 The Directors of Office Bar Ltd were Erica Tatiane De Medeiros and Alexandre Eustaquio Da Costa.
- 9.3 The Director of Brazil Tropical Ltd (the company now applying) is Erica Tatiane De Medeiros.

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- 9.4 The Office Bar application received objections from Environmental Health, WBC Anti Social Behaviour Team, Woking Council CCTV Unit, as well as nine objections from members of the public and a petition signed by sixty seven residents from Enterprise Place.
- 9.5 It was also noted that the Premises did not have Planning Permission to operate as a pub, café or drinking establishment, and should the licence have been granted – should they operate it would be considered an unauthorised use and breach of planning control and would potentially faced enforcement action under planning legislation
- 9.6 A hearing date was set for the 4 August 2022. However on the 3<sup>rd</sup> of August 2023 the applicant withdrew their application, and the hearing was cancelled.

### **10.0 Licence Application**

- 10.1 On the 10 September 2023 an application was received from Manuel Rocha of 'Rochaconsultancy' on behalf of Brazil Tropical Ltd.
- 10.2 The application is for a "café and tapas snack bar" and requesting the sale of alcohol from 11.00 to 23:00 every day, both for consumption on the premises and consumption off the premises.
- 10.3 A copy of the application is attached as Appendix 2.
- 10.4 It should be noted that under the Live Music Deregulation Act – any premises that is licenced for alcohol for consumption on the premises can legally have live/recorded music up until 23:00 without any need for it to be listed on the licence.
- 10.5 Consequently, should this licence be issued, it would also have the potential to have live/recorded music on site without any need to apply or be granted it.
- 10.6 The proposed floor layout plan of the premises is attached as Appendix 3.
- 10.7 It is worth noting that the patio area on the 1st floor is not shown as being intended to be made use of. Having inspected the premises, the outside patio area on the first floor does not appear to be intending to be in use at this time. However the doors to the upstairs external area have clearly been redone on both sides, and the plan suggests access, giving them the possibility in the future to carry out further work to the area and make use of (under 'off sales') this area as an outdoor patio, thus further exacerbating the noise issues and public nuisance.
- 10.8 Photographs of the rear of the property showing the potential external area are attached as Appendix 3a.

### **11.0 The Cumulative Impact Zone**

- 11.1 The Premises upon which the application is for is located within Woking Borough Council's "Cumulative Impact Zone" (CIZ) – also known as a Saturation Policy.
- 11.2 The area within Woking Town Centre was determined by Woking Council and Surrey Police to contain a concentration of licensed premises within a small area of the town centre, of which was resulting in problems of anti-social behaviour, crime and disorder and that therefore an approach to Cumulative Impact was necessary as part of the licensing policy.
- 11.3 The Woking Town Centre Saturation Policy (Cumulative Impact Zone) forms part of the Council's Licensing Policy – section 7.7.

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- 11.4 The Policy relating to the Cumulative Impact Zone states that, “Within the zone, there will be a presumption that all applications for new premises licences, new club premises certificates or variations to existing licences of these type (that are likely to add to the cumulative impact zone) will be refused, following a relevant representation. In making applications for new or varied licences, it will be for the applicant to demonstrate in their operating schedule how they will not add to the cumulative impact of the area in one or all of the licensing objectives.”
- 11.5 The relevant section of Woking Borough Council’s Licensing Policy relating to the Cumulative Impact Zone and the plan of the Cumulative Impact Zones in Woking are attached as Appendix 4.
- 11.6 The existence of a Cumulative Impact Zone policy means that there is a presumption of refusal of applications for new licences within the defined area. However, the Policy will only be triggered in the event that someone submits an objection to the application which then drives it to a licensing committee hearing for determination.
- 11.7 The policy shall only be overridden in exceptional circumstances. The presumption of refusal can be rebutted by the Applicant if they can demonstrate in their operating schedule that there would be no negative cumulative impact on one or more of the licensing objectives.
- 11.8 The policy is aimed at the global effect of licences within the area as a whole and not at the quality of the operation or the fitness of the licensee.
- 11.9 The Applicant has made no reference in his operating schedule to the Cumulative Impact Zone and how the premises will be operated and not add to the existing problems within the area.
- 11.10 Whilst the Cumulative Impact Zone (CIZ) and Saturation Policy can be difficult topics to fully understand – we have included excerpts from a document written by a specialist in Licensing law, Gerald Gouriet QC, who wrote an extensive piece on the importance of Cumulative Impact Zones for the Institute of Licensing, which should be born in mind when considering this application. This is also included in Appendix 4.
- 11.11 The policy is clear in that there will be a presumption that all applications will be refused upon receipt of a valid representation, and the Licensing Authority should only depart from this is ‘exceptional circumstances’ where the applicant is able to show that their premises will not add further to any issues in a specific area.
- 11.12 It is important to remember that the CIZ is not specifically about how well a premises is run – or the conditions directly applying to that premises – but whether the business will affect the area as a whole simply by being there.
- 11.13 An example of an ‘exceptional circumstance’ can be given to help clarify this.
- 11.14 If we look at the previous occupier of 56 Chertsey Road, a tabletop gaming shop who held evenings for their customers – they applied for a licence in 2017.
- 11.15 Consideration was given to this application as it was located within the Cumulative Impact Zone – however there were two main factors when considering this application.
- 11.16 Firstly, they were only applying for sale of alcohol for consumption on the premises until 22:00 at night.

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- 11.17 Secondly, the use of the premises was tabletop gaming. This was evidently not a nightclub, or a dance venue, or somewhere where people are going to be getting drunken and rowdy. Tabletop gaming is, in its essence, delicate and expensive – and it was thought incredibly unlikely that the participants in the games would be causing any drunken disruption.
- 11.18 With its relatively early closing and the type of premises it was, no objections were received, and the premises licence was issued.
- 11.19 As mentioned above, the Policy will only be triggered in the event the premises is located within the defined area and a representation is received. If no representations are received then the application is granted in the terms applied for.
- 11.20 The Licensing Policy CIZ was put in place to prevent further issues in an area already suffering from Anti-Social Behaviour (ASB) on a regular basis. It is therefore important to bear the Policy in mind when making a decision – and ensure that the ‘exceptional circumstances’ are clear, concise and recorded.
- 11.21 There are currently around fifty-seven licenced premises located within in the CIZ.
- 11.22 Details of these premises in summary can be found in Appendix 4b.

### **12.0 Planning and Planning Enforcement Issues**

- 12.1 During the 2022 Office Bar application, it was identified that Planning Permission would be required in order for the property to operate lawfully.
- 12.2 Under planning laws, sites have an ‘authorised use’ that will fall under a ‘past or current Use Class Order’ meaning where planning laws have changed over time, it will be authorised for use depending on when the planning permissions were given, as opposed to a site being potentially negatively affected by planning changes.
- 12.3 Whether a site is granted permission under an old or very new permission, it will have a designation of how it can be used and how it could be used in the future.
- 12.4 This is true whether business, dwelling, field etc; everything has a lawful usage.
- 12.5 In the case of the unit in question, it was granted (what was at that time i.e.. 1961 permission) Class I (one) shop use and the permission did not envisage the site being used as anything else but a shop and the decision was worded as such.
- 12.6 In 1972, the Use Class Order was updated and Class I shop was further defined that it DID NOT COVER sale of hot food.
- 12.7 The Permitted Development Order allows some permitted (i.e. without application) switching between Use Classes subject to criteria and provided the original permission did not restrict this.
- 12.8 The use class order has been updated several times since (latest major revision was Sept 2020) such that ‘shop’ has moved to Class A then subsequently class E; as has the flexibility to move between uses in the same class.
- 12.9 Having liaised with the Planning Department, and referred the Planning information to Mr Rocha, it is believed that the unit is question is relying on the belief they fall into a particular unrestricted area of what was, Class A (A3 restaurant) , and therefore have the flexibility to become Class E, restaurant.

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- 12.10 However, they have not established if their original Class I consent restricted them to shop only and therefore this carries forward each time such that the unit was only ever permitted to be A1 shop and would now only be E(a) shop.(not unrestricted E or E(b) for sale of food and drink for consumption on the premises.
- 12.11 The easiest way for the unit to establish the legality of existing or proposed use, is to apply to the Planning Department for a Certificate of Proposed (or existing) Use.
- 12.12 This will give a definitive answer and should they not agree with the decision, they can Appeal to the Planning Inspectorate (effectively the Secretary of State) for a final decision
- 12.13 It is the licensing authority's preferred position to ensure planning permission is in place before an application for a licence is made.
- 12.14 The Representation from Mr Mike Ferguson, the Senior Planning Enforcement Officer for Woking Borough Council, is included as Appendix 4c.

### **13.0 Objections and representations received: i) Public Objections**

- 13.1 As part of the application process, the Premises Licence Application was advertised both in a local paper (within the first ten days) and on the premises itself (for the full 28 days following the application) in line with legislation.
- 13.2 This gives members of the public time in which to make any relevant representations or objections to the application.
- 13.3 As part of this application, the Licensing Authority has received a total of eight objections from members of the public who either reside within the vicinity of this premises or have a valid reason for raising a concern over the application.
- 13.4 An overview of the Objections are attached as Appendix 5.
- 13.5 The Objections from the public are attached as Appendix 6.

### **14.0 Objections and representations received: ii) Local Authority Objections**

- 14.1 As a statutory consultee, an objection was received from the Environmental Health department.
- 14.2 Whilst not covered by the category of "responsible authorities" – concerns and objections have also been received from other areas within the remit of Woking Borough Council: The Community Safety Officer and the Woking CCTV manager have submitted their concerns in relation to this application.
- 14.3 The Local Authority Department objections are attached as Appendix 7.

### **15.0 Negotiations with the objectors**

- 15.1 Pursuant to legislation, objections to an application for a premises licence are passed to the applicant so that they have the opportunity to contact those objectors and attempt to negotiate an amendment or a proposal of conditions to the application so that they would be happy to withdraw their objections and the licence could be issued without the need for a hearing.
- 15.2 All objections have been forwarded to the Applicant in line with the legislation.

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- 15.3 On the 22 October 2023 we received an email from Mr Rocha advising that  
“Regarding the Sale Of Alcohol and Closing Hours, the applicant is happy to amend the application to Sale Of Alcohol for 22:30 and Close at 23:00 Monday to Sunday”
- 15.4 We received one comment back from one of the objectors and responses from the Woking CCTV manager and the Environmental health Department, all of which stated that they felt that this did not change anything, and they felt the application was still of concern.
- 15.5 No other comments were received from any of the objectors and no objections were withdrawn as a result of Mr Rocha’s proposal.
- 15.6 Mr Rocha’s proposal to reduce hours and the relevant responses from the objectors are attached as Appendix 8.
- 15.7 We do not have any other evidence that Mr Rocha or the applicant have made any attempt to negotiate or discuss the raised concerns with the local residents, nor engage with them or with the Licensing Authority in any way in relating to his application.

### **16.0 Noise nuisance in the area**

- 16.1 The area in question has come under some scrutiny over the last few years on account of an increase in noise nuisance, anti social behaviour and disturbances to local residents. This is clearly evident from the objections received from the members of public and the various Council departments who have voiced their concerns (as referenced in Sections 13 and 14 of this report)
- 16.2 Some of the objections received from members of the public make reference to previous issues with the applicants over noise disturbances and disruption caused by them whilst renovating the premises.
- 16.3 A summary of the issues that Environmental Health had with the applicants is attached as Appendix 8b and the issued notice is attached as Appendix 8c.

### **17.0 Assisting Documentation**

- 17.1 To assist the Licensing Committee, the Councillors Handbook is attached as Appendix 9 and the ‘Pool of Conditions’ is attached as Appendix 10.

### **18.0 Summary**

- 18.1 The Licensing Authority is of the view that the granting of this application would add to Cumulative Impact of licenced premises within the area. Whether the premises is perfectly run inside or not, it still adds to the number of licenced premises within the area and the increase in nightlife within the area.
- 18.2 The residents within the area have serious concerns over the natural effects of how another premises will add to the issues highlighted.
- 18.3 When taken into account with the information on the Cumulative Impact Zone (CIZ) and the guidance provided by Gerald Gouriet QC (Appendix 4) it is absolutely vital that we consider this application carefully and, should the decision be to follow the Council Policy, refuse the application.

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18.4 Should the Licensing Committee be of the opinion that they should deviate from the Policy then the reasons and outcome should be clear and concisely recorded.

### **19.0 Implications**

#### Financial

19.1 There are no financial implications. A nationally set application fee is charged to defray the cost of processing applications.

#### Legal

19.2 A right of appeal lies to the Magistrates Court within a period of 21 days from when the written decision is issued.

19.3 The licensing authority must act to promote the four licensing objectives which are:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

19.4 The licensing authority must have regard to its statement of licensing policy and the guidance issued by the Secretary of State in carrying out its functions

#### Human Resource/Training and Development

19.5 None.

#### Community Safety

19.6 Addressed by considering the application.

#### Risk Management

19.7 The risks to the Council associated with determining an application are:

- Failure to undertake our statutory responsibilities within required timescales;
- Making a decision that may be challenged by the applicant via an appeal to the Magistrates Court with the possible consequence of costs being awarded against the Council; and
- Making a decision that compromises Community Safety.

19.8 These risks have been dealt with in the report under section 4.0 by highlighting that the Sub-Committee is required to determine this application for a premises licence under the Licensing Act 2003 having due regard to the four licensing objectives, national guidance, the local licensing policy, relevant representations and evidence presented at the hearings. Determining applications in this way will reduce the risk of the decisions of the Council being open to challenge via appeal to the Magistrates court and promote Community Safety in the Borough.

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### Sustainability

19.9 The four licensing objectives addressed in the Council's licensing policy, which the Sub-Committee is obliged to have regard to in making its decision, are in line with the Council's sustainability aims.

### **20.0 Conclusions**

20.1 The Sub Committee is requested to consider the report, the evidence it will hear, representations made, responses to question made and give its decision with reasons and determine the application with a view to promoting the licensing objectives.

REPORT ENDS