

Appeal Decision

Inquiry held between 12 July and 15 July 2016

Accompanied site visits made on 12 and 15 July 2016

by Louise Nurser BA (Hons) Dip UP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 28 September 2016

Appeal Ref: APP/P1805/W/16/3142546

Land at Woodside Poultry Farm, Seafeld Lane, near Beoley Worcestershire

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Dean Attwell (Oakland International Ltd.) against the decision of Bromsgrove District Council.
 - The application Ref 15/0361, dated 1 May 2015, was refused by notice dated 3 November 2015.
 - The development proposed is demolition of existing buildings to enable redevelopment as a B8 storage and distribution facility with associated landscaping works.
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Decision

1. The appeal is dismissed.

Procedural Matters

2. The appeal address is not set out within the relevant section of the application form. I have therefore taken the address to be that agreed within the Statement of Common Ground. This was confirmed during the Inquiry and no objections were made.
3. Prior to the opening of the Inquiry, the Proposed Main Modifications to the Bromsgrove District Plan were published. I have accorded them due weight in line with Paragraph 216 of the Framework.

Main Issues

4. The main parties have agreed that the proposed development would represent inappropriate development in the Green Belt as defined by Paragraphs 89 and 90 of the National Planning Policy Framework (the Framework). I concur with that position.
 5. Therefore, from what I have seen, read and heard, I consider the main issues are: a) the effect on the openness of the Green Belt; b) whether the proposed development would conflict with the purposes of including land in the Green Belt; and c) whether any harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations so as to amount to the very special circumstances required to justify the development.
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Reasons

Background and proposal

6. The appeal site lies in the Green Belt as defined by Saved Policy DS1 of the Bromsgrove District Local Plan (LP). It lies in open countryside behind a dwelling owned by the appellant to the north of Seafield Lane.
7. The proposed development is for purpose built ambient and chilled storage to be constructed on the site of disused poultry sheds on land in the ownership of the appellant. It would form an integral part of the operations of the established Oakland International logistics and supply business, and be located some 200 metres from the main buildings of the business.
8. Oakland International (OI) began as a form of farm diversification and has since grown to be a large successful business with an enterprise in Ireland. It is one of five large major consolidation and distribution companies including NFT, Culina Logistics, Fowler Welch and Stobart Chilled. However, it is the only one which operates over three different temperatures. It provides extensive added value activities such as repacking, labelling and tempering food stuffs, and operates a no minimum order policy. OI serves a wide range of customers from Aldi to small scale food producers. The business currently employs around 250 FTE and has aspirations to employ more and expand.
9. The planning history of the site has involved a number of appeals. All had been allowed until two unsuccessful linked appeals against enforcement action were dismissed¹. Following, the dismissal of the appeals against the enforcement notices, the Council's refusal to extend the time limit in which the appellant should comply with the notice and the Planning Inspectorate's refusal to consider an application for a temporary planning permission under S62A of the 1990 Planning, the appellant wishes to provide a building which would replace the unlawful capacity with limited further space for expansion.
10. Unsurprisingly, the proposal raises similar issues to those considered by the Inspector when determining the enforcement appeals. These include the inappropriate nature of the development within the Green Belt, impact on openness, and harm to the purposes of the Green Belt, weighed against the palpable success of the firm, and the consequential economic benefits which extend beyond its own success, its social and environmental credentials, and the potential risk that the firm could fail. As such, I must be mindful of these in the interests of consistency. However, there are three distinct differences between the three. Firstly, it is agreed that the partial or complete relocation of the business would be financially unviable. Secondly, the emerging Bromsgrove District Plan (BDP) is considerably closer to adoption. Emerging Policy BDP1 sets out the presumption in favour of sustainable development, emerging Policy BDP4 provides a generic Green Belt policy which reflects that of the Framework, and emerging Policy BDP13 provides a policy that makes provision for the proportionate increase of a business within the Green Belt subject to a number of overarching caveats. Thirdly, the location of the proposed development is both physically and visually distinct from other operational buildings associated with OI.

¹ APP/P1805/C/13/2200098 and APP/P1805/C/13/2202661

Openness

11. The Framework (paragraph 79) makes clear that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
12. I have been referred to the comparative impact of the existing poultry sheds and silo, and of the proposed building to the openness of the Green Belt. However, the existing poultry sheds are agricultural in nature and thus fall within the exceptions listed in Paragraph 89 of the Framework and are not considered to be inappropriate in the Green Belt. Therefore, by definition their impact on the openness of the Green Belt is less than that of the proposed building to be used for storage and distribution.
13. Nonetheless, I have considered the physical differences between the two. It is set out in the Statement of Common Ground that the existing poultry buildings are around seven metres at their highest point and that the feed silo reaches around nine metres. Their total footprint is approximately 2590 square metres. This compares with the proposed building which is around 11 metres at its highest point and has a proposed floor area of 3480 square metres.
14. From my two site visits, it was clear to me that due to the relative narrowness of the existing silo compared to the extent of the existing agricultural buildings, it makes little impact on openness. Therefore, I have given the height of the silo little consideration in my comparison of the differences in height between the existing and proposed building. I consider that the difference of around four metres between the existing and proposed building is more relevant. I am also aware that the five poultry buildings are arranged in rows with gaps between them, so that whilst the physical footprint of the building may be around 890 square metres greater than that of the poultry buildings, the new building would largely sit on the footprint of the existing buildings. Consequently, in my comparison of the numerical differences between the two I have given most significance to the four metre difference in height, or around a 35% increase.
15. This increase in height is not inconsiderable. Moreover, one type of building is considered as inappropriate in the Green Belt and the other is not. In relation to the impact on openness, I have been referred to the warehouse which had been permitted to replace existing poultry sheds, as well as a previous appeal decision relating to an extension to the cold store on the main site², where due to the proximity to the existing cold store and as the extension was to be located amongst existing buildings, its visual impact was considered to be very limited.
16. Nonetheless, the scale and relationship with other buildings of the previous developments are significantly different to that before me as the proposed development is some distance from the main operation, and is a stand alone development. Moreover, I have considered the development on the evidence before me.
17. Therefore, whilst I am aware of the planting measures and landscaping proposed to help screen the proposal, I conclude that the consequential loss of

² APP/P1805/A/13/2196035

openness would result in considerable harm to the Green Belt. This would therefore be contrary to Saved Policies DS2, and DS13 of the Bromsgrove District Local Plan, adopted January 2004, which are broadly consistent with the objectives of the Framework to protect the Green Belt from inappropriate development unless very special circumstances can be demonstrated. In addition, it would be contrary to emerging Policies BDP1, which relates to sustainable development principles, but includes reference to the restriction of development within Green Belt, BDP4 which sets out when development would not be inappropriate within the Green Belt, and BDP13, which relates to proportionate extensions of businesses within the Green Belt subject to taking into account the impact on openness. In line with Paragraph 216 of the Framework, I have been able to accord significant weight to the emerging policies as they have been the subject of examination and no main modifications have been proposed to them.

Purposes of Green Belt

18. The Green Belt serves five purposes as set out in Paragraph 80 of the Framework. During the Inquiry the Council withdrew its contention that the proposed development would compromise the first purpose of protecting the Green Belt from unrestricted sprawl.
19. There is no dispute that the design of the development would be acceptable. It is clear from the 3D visuals that were provided, that considerable effort has been made to design an attractive building. Nonetheless, the proposed building would be of a scale, and form, which together with its function, including the unavoidable HGVs accessing the site, would be clearly recognisable as a large warehouse set within the countryside.
20. The appeal site is physically separate from the rest of OI's operations and therefore the proposal would appear to extend the OI complex further along Seafeld Lane. I understand that as part of the detailed design of the development that extensive planting is proposed together with changes of level to the land at the north of the appeal site. That is depicted by a photomontage illustrating a number of viewpoints at year 1 and at year 15 to illustrate when any mitigation planting would have begun to reach maturity. The photomontages are also depicted in winter to demonstrate a 'worst case scenario'.
21. I was able to view the appeal site from the identified view points within the montage, with the exception of view point VP5. To that end it was agreed that as accessing this viewpoint involved crossing the busy dual carriageway, and that it appeared that the viewpoint would be screened by trees from year 1, that no purpose would be served in any event.
22. All viewpoints were taken from public footpaths. Whilst it was clear from my site visits that not all the public footpaths were well used, I was able to see examples of evidence of active management of the footpaths, (including an obstruction notice on the footpath leading to VP1 close to the scrap yard) demonstrating that the extensive footpath network in the area is valued.
23. I also observed from driving along the A435 that the proposed building would be very visible from this road, the footway along it, and the footpath leading to VP1. Similarly, due to its height, the proposal would appear as a prominent feature and be seen to encroach into the countryside when viewed from the

footpath crossing fields opposite Seafeld Lane. Elsewhere, the proposed development would be less visible. Nonetheless, I conclude that the development of the warehousing building in the open countryside on the site of a former agricultural building which appears visually and functionally separate to the main operation would appear as encroachment into the Green Belt, and as such would significantly compromise the third bullet point of paragraph 80 of the Framework, which is to assist in safeguarding the countryside from encroachment.

24. I am aware that both parties agree that it would not be financially viable for the business to relocate to alternative accommodation within the urban areas, either as the whole business or in part. However, it is not correct to draw the inference that, as the appellant is unlikely in the immediate future to be investing in development that would assist in urban regeneration, the construction of warehousing that may in the future be occupied by another business does not, as a general principle, impact on the development of urban sites. Therefore, I consider that the proposal would have a moderate negative impact on the fifth purpose of paragraph 80 of the Framework, to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
25. Taken together, the proposal would be at odds with two of the five purposes of the Green Belt and would result in significant harm and would therefore be contrary to Saved Policies DS2 which requires development not to conflict with the purposes of including land within it and DS13 of the Bromsgrove District Local Plan 2004 (LP) which promotes sustainable development subject to protecting the Green Belt and Policies BDP1, of the emerging Bromsgrove District Plan policies which relates to sustainable development principles, but includes reference to the restriction of development within Green Belt, BDP4 which sets out when development would not be inappropriate within the Green Belt, and BDP13, which relates to proportionate extensions of businesses within the Green Belt subject to taking into account the purpose of including land within the Green Belt, which as set out above, in line with paragraph 216 of the Framework, I am able to give significant weight.

Other considerations

26. Much play has been made of the benefit of removing the large disused poultry sheds. However, they are agricultural buildings and thus not inappropriate in the countryside, and from my travel within the area not unusual. If the site needs tidying up the solution is in the hands of the appellant. The whole scale redevelopment of the site as warehousing would seem a rather large sledgehammer to crack a nut, and would be far removed from the advice in paragraph 81 of the Framework for local planning authorities to plan positively to enhance the beneficial use of the Green Belt to improve damaged or derelict land.
27. I note the concerns of the occupier of the neighbouring residential property, relating to the possible introduction of poultry into the existing sheds. However, it appears from the letter from Annyalla Chicks (UK) Ltd that it would be more likely for the site to be sold and new modern sheds built. I have studied the photographs of modern intensive poultry buildings which have been put forward as an unattractive alternative to warehousing. I do not share this opinion, and moreover, if an application were to come forward it would be

considered on its merits. Consequently, I accord minimal weight to the replacement of the existing poultry sheds.

28. It is undisputed that OI's existing business model, which is proposed to continue to operate within the proposed buildings, results in significant fuel savings and associated reduction in carbon emissions for its customer base, in comparison to OI's competitors. I am also aware of OI's existing initiatives relating to recycling, low carbon energy generation and energy efficiency measures together with the impressive list of environmental awards to the company. These measures are to be applauded and they carry moderate weight in favour of the development, particularly in the context of reducing travel.
29. Additionally, I note that the building is designed to incorporate a number of measures to achieve excellence in BREEAM. As any warehouse could be built to similar standards it carries little weight.
30. It is agreed between both parties that it would not be viable for OI to split its business or to relocate to a larger site outside of the Green Belt. I have however noted the solution suggested by Mr Holland to fund the relocation of the business through the redevelopment of the land for housing. However, that option is not before me.
31. There is no dispute that the company has successfully expanded through the unlawful utilisation of buildings 9 and 10. The appellant suggests that around 100 FTE jobs are dependent on the replacement of the unlawful buildings and that 30% of turnover would be threatened. In addition, the loss of capacity at the site may have indirect impacts on jobs through significant increased costs, to customers or retailers who would no longer be able to have access to the efficiencies of OI's unique business model.
32. However, the 100 additional jobs have been provided and continued to be provided, and contracts made and fulfilled on the basis of space which OI's management knew did not have the benefit of planning permission within the Green Belt. Indeed, from October 2014, they were aware that the appeal against the enforcement proceedings had been dismissed. As such, I would agree with Mr Davies' concession made under cross examination, that were the direct employees who were taken on by the company to be made redundant, that the responsibility for the loss of jobs would fall to the business. As such, I would accord the retention of the jobs, which had been created through the continued use of unlawful buildings, and through the construction of replacement floorspace moderate weight.
33. There is less certainty as to the impact of the loss of the capacity of the existing ambient storage on the viability of the business as a whole. I am not convinced that it would not be possible to utilise additional ambient space within the existing lawful buildings if required, albeit it would of necessity have a consequential impact on the amount of space available, as this possibility is clearly set out within Mr Davies' proof. However, this would be a matter of judgement for OI as to how it wished to operate its business to be at its most profitable. Moreover, as no other competitor provides frozen, chilled and ambient storage, it suggests that successful businesses can operate on this basis, and that the threat of customers leaving to alternative providers, or looking to provide their own solution, may be unfounded.

34. Considerable detailed discussion took place relating to business models, margins, turnover, and customers' requirements, such as Spar at 9% of the business and Aldi at 25%. However, whilst I understand that OI wish to retain all its existing customers, continue to 'grow with them' and nurture new relationships, it has not provided me with the evidence to suggest that were the appeal for the warehousing to be dismissed, that the company would fail.
35. Comparisons of competitors' land and building costs, overheads and business models were made. However, whether OI has derived any competitive advantage from its location in the Green Belt or not is a sterile argument. OI has the choice of how it operates its business within its lawful buildings. What is significant is where it prays in aid its business model as a reason to extend within the Green Belt.
36. It is clear from the evidence provided by Mr Holland, and the evidence given by Mr Davies that the business has short and long term aspirations for growth, potentially even abroad. This would require finance from profits derived from its core business. It is also clear from the evidence that the business provides a valuable and valued service. However, I am not convinced that there is a stark choice between expanding the business in its existing buildings or it failing. It may be about tempering its growth aspirations, or means of growth. Indeed, Mr Davies was unable to say incontrovertibly that this would be the case. Whilst it would be regrettable to withdraw some of the business' valued practices such as profit sharing, or being a 'critical friend' to new start-ups, it would be reasonable that all options be explored before resorting to closure, including a robust consideration of which contracts the business could successfully provide within the constraints of its existing buildings.
37. The result of not being granted planning permission may be that some customers, who OI have nurtured, may outgrow the operation and go elsewhere, or the business would rely on a narrower customer base. However, in the absence of compelling evidence that the business would fail completely, and that alternative measures could not be found to secure the business' future, I must accord the avoidance of the potential failure of the whole business limited weight in favour of the scheme.
38. I am aware that the Inspector in appeal APP/P1805/A/13/2196035 took into account the role of OI in the local economy, in supporting small and medium businesses. However, it is apparent that the business has moved on and OI is now a national, or international business. It may still have local links and be unique in its mode of working with small businesses by catering for their needs by bringing goods to market from smaller suppliers which might otherwise not have easy access to the supply chain. Nonetheless, it appears to me that this proportion of the business is not particularly profitable nor does it make up a high volume of OI's turnover. Consequently, I give the support to small businesses moderate weight.
39. I have also considered the proposed increase in capacity of 803 square metres over and above the existing floorspace and its description as expansion capacity. However, I consider that this is of limited benefit due to its scale, and from past experience, would be unlikely to provide much 'future proofing'. This is particularly given that OI has aspirations for future growth, Mr Davies has already been in discussion with the Council for further development on the

site. Indeed, he expressed the opinion that, if allowed, within four years the proposed development would be too small for OI.

40. It is accepted that OI have a strong approach to corporate social responsibility. From the evidence before me there is nothing to suggest that this does not result in significant social benefit. However, given that such a programme is dependent on the financial health of the business, and that the permission of the site runs with the land I accord this moderate weight.
41. The appellant places some reliance on emerging Policy BDP13 which I accept is also of relevance to this appeal, in that it supports proportionate extensions to existing buildings and I have carefully considered its provisions. However, as set out above, the proposed development at around 18% of additional floorspace could not be considered a proportionate extension. I say that, having considered the argument run by the appellant that proportionality is to be gauged taking into account the use, workforce, risk and size of the extension. Even were I to do so, a 66% increase in workforce could not be deemed proportionate and I have found the risk of the business failing to be unconvincing. The proposed development would therefore be at odds with emerging Policy DP13 and it does not weigh in favour of the development in any event.

Other Matters

42. I am aware from the video evidence of HGV movements, which was shown to me during the Inquiry, and from what I have seen; both during my two accompanied site visits, and from when I visited the wider area on an unaccompanied basis that large HGVs regularly access the site via the narrow Seafeld Lane. Indeed, I experienced the need to wait in a passing space as HGVs drove past along the narrow country lane.
43. I am also mindful that the proposed development would only operate between 06:00 and 19:00 and both parties were content for conditions to be placed on any permission to restrict vehicular movements to the building to day time hours and that a Travel Plan to reduce employee journeys could be implemented.
44. I appreciate that residents may consider that the impact of the HGVs results in noise and disturbance. However, taking the above into account, the increase in HGV, and other traffic movements of approximately 19 in the AM peak and 12 in the PM peak, over and above the traffic related to the existing permitted development would not result in significant adverse harm. Such a position is supported by the lack of an objection from the Highway Authority. Therefore, I conclude that no harm would arise from this aspect of the development.

Green Belt Balance

45. The Green Belt balance requires an assessment of whether the harm by reason of inappropriateness and any other harm would be clearly outweighed by other considerations to amount to the very special circumstances required to justify the proposal.
46. I have found considerable harm to the openness of the Green Belt and that it would cause significant harm to the purposes of the Green Belt. In accordance with national policy I therefore attribute very substantial weight to the totality of the harm to the Green Belt.

47. The appellant puts forward a number of other considerations to weigh in the Green Belt balance. I have found that the reduction of carbon emissions and other environmental activities which OI implements would be of moderate benefit. There would be moderate benefits from OI's approach to social responsibility, avoiding the loss of jobs associated with the existing unlawful floorspace, and the potential impact on the wider business sector, including small businesses. I have assigned limited weight to the potential closure of the whole business. Limited benefits would accrue from the proposed achievement of BREEAM excellence on the appeal building and the provision of further additional floorspace. I have also accorded minimal weight to the replacement of the existing poultry sheds.
48. The appellant also contends there would be benefits in terms of the three strands of sustainable development. Clearly, the continued success and growth of the business which employs over 250 FTE directly, and has a positive impact on other businesses indirectly, together with the economic benefits from construction jobs associated with the building of the proposed development would accord with the economic strand of sustainable development.
49. The ability to continue employing staff, many of whom live in deprived wards of north Redditch, and to carry on with OI's Corporate Social Responsibility activities including profit sharing and housing of a Food Bank as well as its outreach work, accords with the social aspect of sustainability.
50. However, whilst OI clearly has strong environmental credentials implicit in its business model for which it has won awards, the removal of the poultry sheds and any potential agricultural use of the site, and the delivery of an energy efficient building within the Green Belt would not result in sustainable development, as this is clearly excluded by footnote 9 of the Framework where specific policies indicate development should be restricted such as the Green Belt. This therefore does not weigh in favour of the scheme
51. It is apparent that OI is a very successful business whose margins are relatively high compared to the industry standard. It is undisputed that it provides a professional service to its customers and that the range of services it supplies makes it very attractive, as well as unique in the market. Its customers wish it to grow in line with their growth. The business understandably wishes to satisfy any increase in demand for its services. This is not a matter though that can carry weight in favour of the scheme.
52. I say that given the objective to grow with an associated requirement for floorspace or volume on the same site clearly conflicts with the identification of the land as Green Belt whose permanence and openness is a clear objective of national policy supported by existing Policies DS1, DS2 and DS13 of the LP and emerging Policy BDP1 (BDP) which relates to the presumption in favour of sustainable development, except where specific policies in the Framework indicate that development should be restricted as stated in footnote 9, and emerging Policy BDP 4 which reflects the Green Belt policies of the Framework.
53. Furthermore I have been referred to the 'blank cheque' approach as set out in the *Summers Poultry Products v SoSCLG and Stratford-on-Avon DC [2009] EWHC 533 (Admin)* judgement and in common with the Inspector who considered the previous enforcement appeals³, I have some sympathy with the

³ APP/P1805/C/13/2200098 & APP/P1805/C/13/2202661

Council that the appellant has taken a similar attitude towards development within the Green Belt. I note that the proposed increase in floorspace for the business is not of the quantum referred to within the Summers Poultry Case. Nonetheless, there appears to be a clear objective that the business continues to expand in the Green Belt in response to its customers' needs, rather than seeing that the business' location within the Green Belt is a constraint which requires the adjustment of the business to work within the planning limits of the site, including those of the development plan. Thus this apparent disregard of those constraints and the findings of the previous Inspector reinforces my decision.

54. Therefore, having regard to the judgements in *Pehrsson* and *Wychavon*⁴, and applying the clear and longstanding national Green Belt planning policy reaffirmed in Framework paragraphs 87 and 88, the development would be inappropriate development. The proposal would be by definition harmful to the Green Belt which the Framework indicates should be given substantial weight. I have found that the proposed development would result in significant harm to the openness of the Green Belt. The development would also be at odds with two of the five purposes of the Green Belt, as described in the Framework, to which I have ascribed significant harm. Collectively, this carries substantial weight.
55. Overall the weight I have given to the other considerations put forward do not clearly outweigh the substantial harm to the Green Belt which the development would cause. Consequently, there are not the very special circumstances necessary to justify inappropriate development in the Green Belt and the proposal would therefore conflict with Saved Policies DS1, DS2 and DS13 of the LP, and emerging BDP1, BDP4 and BDP13 of the BDP and the national policy advice set out in the Framework.

Conclusion

56. For the above reasons, having regard to all other matters raised I find that the other considerations in this case do not clearly outweigh the harm to the Green Belt that I have identified. Consequently, the very special circumstances necessary to justify the development do not exist.
57. I conclude that the appeal should be dismissed.

L. Nurser

INSPECTOR

⁴ *Pehrsson*⁴ vs the Secretary of State for the Environment [1990] PLR 80, *Wychavon District Council vs the Secretary of State* [2008] EWCA Civ 692

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Miss Sarah Clover	Of Counsel, instructed by Ms Sarah Sellers, Principal Solicitor Bromsgrove District Council
She called Mr Tim Johnston, BSc (Hons.), FCA, Honorary Fellow John Moore's University. Mr Andrew Fulford BSc (Hons) MA, MRTPI	Director Amion Consulting Ltd Principal Planning Officer Bromsgrove District Council

FOR THE APPELLANT:

Mr Jeremy Cahill	Of Queen's Counsel, instructed by Simon Hawley, Harris Lamb
He called Mr Barry Davies IoLMDip Mr Simon Hawley BA (Hons) MA, MRTPI	Managing Director Oakland International Ltd. Director Harris Lamb

INTERESTED PERSONS:

Mrs Jean Luck	Vice- Chair Beoley Parish Council
Mr John Holland BSc (Hons.) Dip Mems, CMS, AMIQ	Local Resident
Mr Robert Knox BSc, Eur Ing, CEng, IMET	Local Resident

DOCUMENTS

- 1 Written statement by Mrs Jean Luck on behalf of the Parish Council
- 2 Copy of public notice relating to Goods Vehicle Operator's Licence submitted on behalf of Mrs Jean Luck
- 3 Written Statement by Mr John Holland
- 4 Written Statement by Mr Robert Knox on behalf of local residents
- 5 Further Written Statement by Mr John Holland
- 6 Email from Jonathan Elmer North Worcestershire Economic Development and Regeneration submitted by Mr Fulford
- 7 Note by Cory Winstanley Human Resources Director Oakland International Estimated Relocation Costs (Example) submitted by the Appellant.

PHOTOGRAPHS/VIDEOS

- 1 Copies of six photographs taken by Mr Davies at accompanied site visit
- 2 Video link provided by Mr Robert Knox as viewed at the Inquiry