



Appeal Decision

Hearing held on 22 October 2024

Site visit made on 22 October 2024

by James Blackwell LLB (Hons) PGDip, Solicitor

an Inspector appointed by the Secretary of State

Decision date: 14 November 2024

Appeal Ref: APP/B1550/C/23/3326164

Land at Brooklands Farm, Apton Hall Road, Stambridge Essex SS4 3RG

- The appeal is made under section 174 of the Town and Country Planning Act 1990 (as amended).
- The appeal is made by Mr Jordan Stone of JCS Poster Site Construction Ltd against an enforcement notice issued by Rochford District Council.
- The notice was issued on 6 June 2023.
- The breach of planning control as alleged in the notice is "Without planning permission, the following:
 - (a) The erection of building as marked with an 'A' on the plan of the Land;
 - (b) The carrying out of engineering operations involving the removal of topsoil and laying a reinforced extensive area of a hardstanding in the area marked with a 'H' on the plan of the Land;
 - (c) The material change of use of the Land and buildings from agricultural uses to a mixed use of the Land for agriculture and for a Class B2 use comprising:
 - (i) The assembling of bus shelters and other street furniture within the building marked with an 'A' on the plan of the Land not connected to an agricultural use;
 - (ii) Storage in connection with the Class B2 use occurring in buildings marked 'A', 'B' and 'C' on the plan of the Land not connected to an agricultural use;
 - (iii) The use as office space in connection with the Class B2 use of the building marked with a 'D' on the plan of the Land not in connection with agriculture; and
 - (iv) Open storage and vehicle parking and turning on the area marked with an 'H' on the plan of the Land associated with a Class B2 use.
- The requirements of the notice are:
 - (1) Permanently cease the Class B2 use (including for the assembly of bus shelters and other street furniture and relevant storage) of and demolish (including removal of rubble and all building materials from the Land the building marked 'A' on the plan of the Land.
 - (2) Permanently break up and remove from the Land the area of hardstanding (including all rubble and building materials) from the area marked with an 'H' on the plan of the Land and replace with topsoil and grass so as to be level with the rest of the Land.
 - (3) Permanently cease the Class B2 use of the buildings marked with a 'B' and 'C' on the plan of the Land and ancillary storage in connection with Class B2 uses.
 - (4) Permanently cease the office use (in connection with the Class B2 use) of the building marked with a 'D' on the plan of the Land.
 - (5) Permanently cease the open storage, parking and turning (in connection with the Class B2 use) of the area marked with an 'H' on the plan of the Land.
- The period for compliance with the requirements is 12 months from the date the notice takes effect.
- The appeal is proceeding on the grounds set out in section 174(2)(a), (b), (c) and (f) of the Town and Country Planning Act 1990 (as amended). Since an appeal has been

brought on ground (a), an application for planning permission is deemed to have been made under section 177(5) of the Act.

Summary decision: The appeal succeeds in part and planning permission is granted for the erection of Building A. The appeal is otherwise dismissed and the enforcement notice is upheld with corrections and variations in the terms set out below in the Formal Decision.

Preliminary Matters

1. The appeal site comprises a parcel of land within Brooklands Farm, and is made up of a number of different components which are referred to separately in the enforcement notice (EN): Building A, as referenced on the EN plan, is a new building which occupies land formerly occupied by a chicken shed; there are three additional buildings labelled B, C and D on the EN plan; and there is a large area of hardstanding to the south of these buildings. These shall be referred to accordingly in this decision.
2. The appeal site benefits from a Prior Approval dated 16 August 2022 (reference 22/00630/DPDP4D) (Prior Approval). This approved a change of use of three agricultural buildings within the appeal site to a B8 (storage and distribution) use. The Prior Approval related to buildings B and C shown on the EN plan, as well as the chicken shed previously located on the part of the site now occupied by Building A. Whilst neighbours have said the Prior Approval should not have been granted due to inaccuracies with the submitted information, it is beyond the period for challenge. Its validity is therefore not a matter for this appeal. Nonetheless, it remains relevant to the discussion of the grounds of appeal.
3. The appellant says the appeal site's use is consistent with the B8 use authorised by the Prior Approval. Conversely, the Council says the site's primary use is for the erection of bus shelters and other street furniture, which they contend falls within a B2 (general industry) use class. This provides context for much of the dispute between the parties.
4. The parties agree that the appeal site forms a single planning unit, and I have no reason to disagree with this assessment. I have considered each of the grounds within this context.

Ground B

5. Pursuant to ground (b), the appellant says parts of the matters alleged have not occurred as a matter of fact. Specifically, the appellant says a material change of use of the appeal site from an agricultural use to a mixed-use comprising agriculture and a Class B2 use has not occurred, on the basis of the site's use being a B8 (storage and distribution) use, and not a B2 (general industry) use. As a legal ground of appeal, the burden is on the appellant to demonstrate their case, on the balance of probability. Planning merits are not relevant.
6. The appellant owns a company which assembles and installs street furniture and advertising structures throughout the UK. The site is said to be used as a depot to store tools, materials and vehicles associated with the business. Employees come and go from the site in order to collect or drop off the tools, materials and vehicles needed for their work.
7. In terms of the various components of the site, the appellant says Building A is primarily used for the storage of street furniture and certain vehicles; Building

B is used to store fixings, hand tools and cabling; Building C is used to store larger tools, ladders and barriers; Building D is used as an office; and the hardstanding is used for the storage of vehicles and waste materials. This summary reflects my own observations during site visit, and is indicative of the site being used for storage and distribution purposes.

8. The materials which are stored on site include bus shelters: both new ones which are ready to be installed and old ones which are stored on site prior to being repurposed or disposed of. Use of the site for this purpose is consistent with a storage and distribution use.
9. Nonetheless, bus shelters are sometimes assembled on site, usually in Building A. The appellant's sworn statement says they usually only "*do a couple a week*". This position is reiterated in the sworn statement of Vincent Saliba, who says "*at most I build 2 shelters a week*". In part, this is because the bus shelters are said to only be assembled on site when they are to be installed within 60 miles of the site. Bus shelters which are installed further afield need to be assembled elsewhere, as the risk of damage during transportation is considered too great. In this context, the limited number of shelters which are said to be assembled on site each week seems realistic. The appellant's accounting data for the year preceding the EN also suggests the assembly of bus shelters represents a very small proportion of the business' turnover, which is consistent with this position.
10. Therefore, whilst bus shelters are assembled on site, the evidence suggests use of the site for this purpose is relatively minor by comparison to the storage and distribution use. Notably, the shelters are said to be constructed from flat pack, and take roughly 1-2 hours to assemble. If two are constructed each week, this means the site is only used in this way for approximately 4 hours in a given week. This level of activity is not commensurate with a primary use of the appeal site.
11. Contrary to the Council's view, I also have no reason to doubt the site would continue to operate as a "depot" for the appellant's business, even if bus shelters could not be assembled on site. In other words, the storage use does not appear to be contingent on bus shelters and other street furniture being constructed on site. During the hearing, the appellant volunteered to preclude such use from the site entirely, which attests to this point. This factor is again indicative of the site's use for the construction of bus shelters being ancillary in nature.
12. Whilst at times, some noise may be attributed to the assembling of the shelters themselves, much of the local concern relates to noise deriving from vehicle movements to and from the appeal site, including from the loading and unloading of street furniture using HIAB vehicles. Such activity is not inconsistent with a storage and distribution use, which is authorised by the Prior Approval.
13. On the evidence before me, the primary use of the site is consistent with a storage and distribution use and any use for the construction of bus shelters appears to be ancillary in nature to this primary use. On the balance of probability, the appellant has therefore demonstrated that the primary use of the appeal site was a B8 (storage and distribution) use on the date the EN was issued. In turn, the alleged material change of use of the appeal site to a mixed-use comprising agriculture and a B2 use, has not occurred as a matter

of fact. The appeal therefore succeeds on ground (b) insofar as it relates to this component of the matters alleged.

14. Given the outcome on this ground, the ground (c) appeal, which also relates to the alleged material change of use, does not fall to be considered.

Ground A

15. Given the success of the appeal on ground (b), consideration of ground (a), which is the deemed planning application, is limited to the first two components of the matters alleged in the EN. These are the erection of a building marked 'A' on the plan of the Land and the laying of an area of hardstanding in the area marked with a 'H' on the plan of the Land.

16. The main issues are:

- whether the development is inappropriate development in the Green Belt having regard to the Framework and other development plan policy, including consideration of its effect on openness;
- the effect of the development on the character and appearance of the area;
- the effect of the development on the living conditions of neighbouring occupiers; and
- if applicable, whether any harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances required to justify the development.

Building A

Inappropriate Development

17. The appeal site is located within the Green Belt. The National Planning Policy Framework (2023) (Framework) is explicit that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It goes on to say that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraphs 154 and 155 of the Framework set out a number of exceptions where development within the Green Belt may not be considered inappropriate.
18. Under paragraph 154(d), these exceptions include the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces. As mentioned, Building A replaced a chicken shed. Before its demolition, the appellant says the chicken shed was used for storage purposes, including for the storage of ladders and a scaffolding tower in conjunction with the appellant's business. There is little before me to contradict this assertion, which would mean its previous use was consistent with its current storage and distribution use.
19. There was some discussion during the hearing as to the correct plans for the pre-existing building. On the evidence before me, the plans labelled "Existing Plans – Building 1 – Floor Plans" (Ref 21-1668 Rev C) and "Building 1 – Elevation Plans" (Ref 21-1668 Rev C) appear to be the correct ones. These are consistent with the previous Block Plan, which shows the former chicken shed

to be the largest of the buildings on the appeal site. The drawing elevations are also consistent with the photos of the former building.

20. These plans show that the pre-existing building had a length of 25.2 metres and a depth of 10.2 metres. Building A, which replaced it, is shown to have a length of approximately 20.6 metres and a depth of approximately 10.7 metres. This means the footprint of Building A is smaller than the previous building. This reflects my observations during site visit, as the base of the previous building was clearly visible beyond the footprint of the current one.
21. In terms of height, the former building had a pitched roof, and was approximately 3.1 metres tall at its lower eaves' level, rising to approximately 4.2 metres tall at its ridge (when measured internally). The new building incorporates a flat roof, and based on plans, is shown to measure approximately 4.55 metres in height. Whilst the new building is therefore taller than previous, the increase is largely offset by its smaller footprint.
22. Overall, this means the new building is not materially larger than the one it replaced. The building therefore falls within the exception under paragraph 154(d), and is not inappropriate development within the Green Belt. The development is consistent with Policies GB1 and GB2 of the Core Strategy and Policies DM11, DM12 and DM13 of the Council's Development Management Plan (2014) (DMP), insofar as they support rural diversification projects within the Green Belt for small-scale employment use.

Character and Appearance

23. The building comprises a simple structure which incorporates dark green corrugated sheeting on its external surfaces. This is in-keeping with the building's rural location which allows it to assimilate well within its environment. It is also sited next to the other buildings within the appeal site, which means it integrates effectively with the existing built fabric of the site. In terms of design, the building preserves the character and appearance of the appeal site, and is consistent with Policy CP1 of the Council's Core Strategy (2011). This policy seeks to ensure development achieves good, high-quality design which has regard to local flavour.

Living Conditions

24. Building A is used to store bus shelters, street furniture and vehicles associated with the appellant's business. At times, bus shelters are also constructed within the building. The building therefore helps facilitate the operation of the appellant's business from the appeal site.
25. As mentioned, there is notable opposition to the use of the appeal site. Much of this stems from noise and disruption associated with the assembly of bus shelters within the appeal site and from vehicle movements to and from the site. However, as mentioned, such impact is not inconsistent with a storage and distribution use, which was authorised within this part of the appeal site by the Prior Approval. As a replacement building, its associated impact must be assessed within this context. If the former building had been retained and used for the same purpose, its amenity impact is likely to have been very similar to the new building.
26. Conditions can also be imposed to tighten the restrictions on the use of the building, which will help mitigate against the amenity impacts. These conditions

can include restrictions on the operating hours of the site and a ban on the construction of bus shelters within the appeal site.

27. When considered in the context of the authorised use of the appeal site, I am therefore satisfied that the erection of Building A does not cause undue harm to the living conditions of neighbouring occupiers. This aspect of the development is therefore consistent with Policy DM11 of the DMP, which provides support for existing businesses within the Green Belt, provided they do not have an unacceptable adverse effect on the amenity of neighbouring occupiers.

Conclusion – Building A

28. Overall, Building A is not inappropriate development within the Green Belt. It preserves the character and appearance of the area, and does not unduly harm the living conditions of neighbours. The building is therefore consistent with the development plan as a whole, and planning permission should be granted for this aspect of the development.
29. The appeal on ground (a) therefore succeeds insofar as it relates to the erection of Building A.

Hardstanding

Inappropriate Development

30. Paragraph 155(b) of the Framework says certain engineering operations will not be inappropriate development in the Green Belt, provided they preserve its openness and do not conflict with the purposes of including land within it. Whether or not the hardstanding (which is an engineering operation) either is or is not inappropriate, therefore depends on its impact on openness.
31. The hardstanding extends from the southern side elevation of Building A towards the rear of the appeal site, and according to the Council, measures approximately 49.6 metres in length and 21.15 metres in width. The extent of hardstanding is seen as a notable intrusion into the Green Belt, as it has urbanised a large extent of land which was previously laid to grass. Visually, it detracts from the site's openness.
32. The hardstanding is also used to store numerous vehicles (which include HGVs), stock, materials and street furniture associated with the appellant's business. This means extensive parts of the hardstanding are occupied by large and bulky goods, which further detracts from the spatial sense of openness within the appeal site.
33. Given the hardstanding fails to preserve the openness of the appeal site, it would not fall within the exception prescribed by paragraph 155(b) of the Framework. In particular, the hardstanding does not safeguard the countryside from encroachment, and therefore conflicts with one of the five purposes of the Green Belt. The hardstanding therefore constitutes inappropriate development in the Green Belt.

Character and Appearance

34. The appeal site sits between a number of residential properties, each of which are set within large gardens which extend out significantly to their rear. The appeal site is no different in this regard. As mentioned, use of the hardstanding has an urbanising impact on the land to the rear of the property, much of

which is visible beyond the high boundary fences, trees and hedgerows which surround parts of the site. The use appears incongruous with the open and undeveloped nature of the land and gardens which surround it on either side, which detracts from the site's rural credentials. The hardstanding therefore harms the character and appearance of the appeal site and the surrounding area and conflicts with Policy CP1 of the Core Strategy.

Living Conditions

35. The hardstanding significantly increases the scale of the appellant's business within the appeal site. It contributes to its overall intensity of use which is much greater than envisaged by the Prior Approval.
36. Notably, the supporting statement to the Prior Approval application said, "*the storage use itself does not generate any noise impact, any noise generated would be of a low level of the arrival and departure of small vehicles and that of the loading and unloading process*". It went on to say that "*due to the size of the buildings, traffic types will be limited to cars and small vans*". However, the hardstanding facilitates much larger vehicle movements from HGVs and HIAB vehicles, which were clearly not envisaged by the Prior Approval. The frequency of such movements is also understood to be much greater.
37. By their nature, these sorts of vehicle movements will invariably be more disruptive to nearby neighbours. For example, neighbours highlight noise and disruption from beeping, horns, drivers shouting and glare from lights, often during anti-social hours. Given the proximity of the appeal site to residential properties, these are legitimate concerns.
38. On account of these impacts, the increased scale and intensity of the appellant's business, much of which is attributed to the hardstanding, exacerbates the harm to the living conditions of neighbouring occupiers. The hardstanding therefore conflicts with Policy DM11 of the Council's DMP, which says any extension to an existing business in the Green Belt should not have an unacceptable impact on the amenity of nearby residential occupiers.

Other Considerations

39. The hardstanding helps facilitate the appellant's business, which provides some benefits to the local economy, particularly through local job creation. However, there is nothing before me to suggest the business could not operate from an alternative site, which means these benefits are likely to be achievable elsewhere.
40. The appellant says an area of hardstanding could be constructed under permitted development rights, which they say acts as a legitimate fallback which should justify the retention of part of the hardstanding.
41. In particular, the appellant says some of the land laid to hardstanding could still be used in conjunction with their business pursuant to Class R of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (GPDO). This is because the Class R rights permit the change of use of a building and any land within its curtilage to a flexible commercial use.
42. For the purposes of Class R, curtilage is defined in the GPDO as either "*(a) the piece of land, whether enclosed or unenclosed, immediately beside or around*

the agricultural building, closely associated with and serving the purposes of the agricultural building; or (b) an area of land immediately beside or around the agricultural building no larger than the land area occupied by the agricultural building”¹. The definition is explicit that the lesser of these two options will apply.

43. At most, the extent of curtilage is therefore limited to the size of each of the buildings which were the subject of the Prior Approval. In terms of the chicken shed, the area most closely associated with that building would likely have been the land running alongside to its east, which would have been roughly equivalent in size to the building. In terms of the new building, this same area of land acts as a forecourt outside of its large access openings.
44. Even if this land were considered curtilage, it is largely separate from the hardstanding shown on the EN plan, and would therefore not justify its retention. The hardstanding which is the subject of the EN is also not immediately beside or around Buildings B and C, and so the curtilage to these buildings would again not extend into this area.
45. Given the tight restrictions which govern the extent of curtilage under Class R, my conclusion would be similar in respect of Class J², which subject to conditions, permits the provision hard surfaces within the curtilage of warehouse buildings. Even so, in terms of the permission granted in respect of building A, a condition restricting the application of these rights is justified to ensure the scale of the appellant’s business is adequately controlled within the site.
46. Notwithstanding the Class R or Class J rights, the appellant also says that hardstanding could be permitted pursuant to Class B of Part 6 of Schedule 2 of the GPDO. Class B permits certain agricultural development on units of less than 5 hectares. Whilst Class B(e) permits the provision of hard surfaces, this is subject to the proviso that the development is reasonably necessary for the purposes of agriculture. Given the parties agree the site is no longer used for any agricultural purpose, there appears to be no real likelihood of the Class B rights being implemented. Therefore, the rights afforded by Class B do not represent a legitimate fallback.
47. This means there is no fallback which would justify the retention of the hardstanding, or any meaningful part of it. Therefore, the other considerations do not clearly outweigh the harm by reason of inappropriateness and the harm to living conditions. In turn, the very special circumstances necessary to justify this aspect of the development do not exist. The hardstanding therefore conflicts with paragraph 152 of the Framework and the overarching objectives of Policies GB1 and GB2 of the Core Strategy and Policies DM11, DM12 and DM13 of the DMP.

Conclusion – Hardstanding

48. For the reasons given, the hardstanding conflicts with the development plan as a whole and there are no other considerations, including the provisions of the

¹ X (Interpretation of Part 3), Part 3, Schedule 2, Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

² Class J, Part 7, Schedule 2 Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

Framework, which outweigh this finding. The appeal on ground (a) therefore fails insofar as it relates to hardstanding.

Ground F

49. Pursuant to ground (f), the appellant says that the steps required to be taken in the EN exceed what is necessary to remedy the alleged breach of planning control. Given the outcome of the appeal with regards to the alleged material change of use and the erection of Building A, consideration of this ground is limited to the hardstanding. In this regard, the appellant says the hardstanding could be reduced in size to overcome any objection to the development. As discussed, this is, in part, based on their contention that permitted development rights could be relied upon to construct an area of hardstanding in its place.
50. It is worth highlighting that, as per s173(4) of the Town and Country Planning Act 1990, the purpose of the EN is to remedy the breach of planning control. The requirements set out in the notice must achieve this purpose. The steps which require removal of the hardstanding and reinstatement of this area with topsoil and grass go no further than remedying the breach of planning control, and any lesser steps would fail to properly achieve this purpose.
51. More specifically, whilst a reduction in the size of the hardstanding would reduce the level of harm to the Green Belt, it would not overcome this harm completely. Moreover, a smaller area of hardstanding would still add to the overall scale and intensity of the site's use, which means the amenity harm would likely subsist. As discussed, I am not persuaded that any permitted development rights could be relied on to reinstate an area of hardstanding within the same part of the site, particularly for the same use. In turn, there is no fallback which would justify a lessening of the requirements.
52. The requirement to reinstate the area of hardstanding to grass is also a proportionate step, which goes no further than remedying the harm caused to the Green Belt. If this requirement were removed, there is a greater risk that this part of the site would continue to be used in the same way.
53. For these reasons, the appeal on ground (f) fails.

Conditions

54. During the hearing, conditions were discussed in the event permission was granted for the development. Given the outcome of the appeal on ground (a) in respect of Building A, I have reviewed these conditions in line with the Framework and Planning Practice Guidance.
55. I have included a condition to restrict hours for deliveries and collections, which will help ensure the site is not operative during anti-social hours. This will help mitigate against the amenity impact of the development. For similar reasons, I have placed a restriction on the construction of street furniture within the appeal site.
56. I have also included a condition restricting the application of certain permitted development rights in respect of the site, specifically those which relate to industrial and warehouse uses. This is justified, as it is essential that adequate control is retained over any future changes to the site's use, to help limit its scale and intensity, thereby protecting the amenity of neighbouring occupiers.

57. The new building does not necessitate any additional landscaping to make it acceptable in planning terms, and so no condition is needed in this regard. There is also little justification before me, whether policy or otherwise, to warrant any conditions relating to BREEM, biodiversity, pollution control or EV charging points.

Conclusion

58. On the evidence before me, I conclude that the alleged material change of use of the appeal site to a mixed use comprising agriculture and Class B2 use has not occurred, and the appeal on ground (b) succeeds to that extent. I have therefore corrected the EN to remove this component from the allegation. I have also varied the requirements to delete all those steps which relate to the cessation of the alleged material change of use. Given the appeal on ground (c) related to the same aspect of the allegation, this ground does not fall to be considered.
59. I have also concluded that the appeal on ground (a) should succeed insofar as it relates to the erection of Building A. However, the appeal on grounds (a) and (f) fail insofar as they relate to the hardstanding, and the enforcement notice is therefore upheld with the corrections and variations set out.
60. I should highlight that the erection of Building A will still form part of the matters alleged in the EN. The steps requiring its removal shall also remain. This is to avoid unconditional planning permission being granted for the building pursuant to s173(11) of the 1990 Act. However, in accordance with s180(1) of the 1990 Act, the EN will cease to have effect insofar as it is inconsistent with the planning permission granted as part of this appeal.

Formal Decision

61. It is directed that the enforcement notice is corrected by:
- (a) the deletion of paragraph 3(c)
- and varied by:
- (b) the deletion of step (i) from paragraph 5 and its substitution with the following new step (i):
 - (i) Demolish (including removal of rubble and all building materials from the Land) the building marked 'A' on the plan from the Land.
 - (c) the deletion of steps (iii), (iv) and (v) from paragraph 5.
62. The appeal is allowed insofar as it relates to the erection of Building A and planning permission is granted on the application deemed to have been made under section 177(5) of the 1990 Act as amended for the development already carried out, namely the erection of a building as marked with an 'A' on the plan of the Land at Brooklands Farm, Apton Hall Road, Stambridge, Essex SS4 3RG, as shown on the plan attached to the notice and subject to the following conditions:
- 1) Deliveries and collections to and from the site shall only take place between the following hours:
0700 – 1900 Mondays – Fridays

0700 - 1300 on Saturdays
and at no times on Sundays or Bank Holidays.

- 2) No street furniture, including bus shelters, shall be constructed or assembled on the site at any time.
 - 3) Notwithstanding the provisions of Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting that Order with or without modification), no further development shall be carried out on the site under or in accordance with Part 7 of Schedule 2 to that Order.
63. Subject to the corrections and variations, the appeal is otherwise dismissed, the enforcement notice is upheld and planning permission is refused on the application deemed to have been made under section 177(5) of the 1990 Act (as amended) for the carrying out of engineering operations involving the removal of topsoil and laying a reinforced extensive area of a hardstanding in the area marked with a 'H' on the plan of the Land.

James Blackwell

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Kate Olley (FTB Chambers)
Nicholas Kingsley-Smith
Jordan Stone
Philip Childs
Vincent Saliba
Jamie Hackshaw
David Hughes

FOR THE LOCAL PLANNING AUTHORITY:

Arwel Evans
Calum Lewis
Gavin Palmer

INTERESTED PARTIES:

Elizabeth Colby
Lorraine Wright
Jacqueline Adams-Hooker