

HIGHCLIFFE AND WALKFORD PARISH COUNCIL

Written response to BCP Council's *Local Plan: Issues & Options* document

March 2022

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INTRODUCTION

This report has been prepared by the **Highcliffe & Walkford Parish Council (HWPC)** working party, on behalf of HWPC.

The Local Plan from BCP Council will determine the strategy for the type, location and volume of development which will take place across the BCP area up to 2038. All consultation processes are vital and should be as democratic and open as practicable.

It is therefore important to set out the concerns of HWPC residents (and indeed others across Christchurch) regarding **the process itself**. We are also making a **recommendation** regarding the next phase of consultation.

Consultation period. The initial period was far too short. This was extended from its original deadline date, from March 7th to March 25th, but this only happened after pressure from several quarters, including the five Christchurch parishes. However, we fear that even this longer period was insufficient for a good representation of informed responses to be given.

Publicity. Because of this short period, and the lack of quality communications other than on niche platforms such as Twitter, many BCP residents are still unaware that there has been a consultation at all. This could have been addressed with a more thorough and democratic awareness campaign.

Online consultation process. This was extensive, hard to navigate, and unnecessarily complicated. Although we hope that it does technically deliver the capturing of data, the process was overwhelming and disincentivising.

Many residents, even those who considered themselves computer-literate, had complained about how hard they found it to fill in the form, and to tackle the interactive map to comment on individual sites identified. One resident said the process took him seven hours to complete.

With our older demographic in Highcliffe and Walkford, this online approach was particularly disadvantageous. Many residents do not even have access to a computer.

Response formats. At the start of the process, it was unclear to many of us (even some councillors) that written responses could be made to the consultation, rather than just online. It has been suggested to us that this facility was offered belatedly, because of the public pressure noted above. If so, more effort should have been made to notify residents of this change.

General. The chairman of the HWPC working party has had meetings with representatives of the other parish councils, councillors of the borough, residents, the Highcliffe Residents Association, and the Member of Parliament for Christchurch, to gain a wider perspective on the issues and feeling elsewhere. Our concerns have been replicated at all levels across the borough – and in Throop, the fifth and newest parish council.

Our outreach work has helped to inform some isolated residents and support a joined-up approach from the parishes.

However, this is in no way a replacement for a proper committed communication campaign from BCP Council. There is widespread concern about the consultation process, and a clear view that this is not an acceptable way for BCP Council to conduct such a process if it genuinely wants to listen to the views of the residents and take these into account.

Recommendations. We therefore make the following recommendations regarding the next consultation phase:

- More advance notice, so that councillors, residents' associations, and other groups can begin to prepare support and outreach work in the communities.
- A much longer consultation period – given the critical nature of the future *Local Plan*, a minimum of **3 (three) months** is recommended.
- A clear communication of response formats, including a commitment from day one to accept non-form responses, and an email address to send responses to.
- A wider and more effective communication strategy, to ensure a better representation of residents.

As a final preliminary comment, it should be noted that the actual **HWPC** area is different to the region identified in the consultation document. This error should be rectified in the next document. Overlapping the Christchurch Town Council and parish areas would create a confusing layering on plans. There must be a consistent approach on ward boundaries.

THE HIGHCLIFFE AND WALKFORD NEIGHBOURHOOD PLAN

Work began on formulating this Plan in 2019 shortly after the formation of HWPC. This work is almost complete.

The Local Plan response is informed in part by the policies contained in our Neighbourhood Plan, which is currently under examination.

The policies expressed in the Neighbourhood Plan are restrained, realistic, achievable and reflect the wishes of the local community. It is essential that these are not compromised by any conflicts introduced by the Local Plan.

The top priorities for our Neighbourhood Plan are:

- Looking after our green spaces – in particular, enhancing wildlife / natural areas and connecting corridors areas and having good access to the beach.
- Revitalising the High Street – improving the outdoor areas, traffic management and encouraging a better range of shops and services.
- Encouraging walking and cycling as a way of getting about - through the provision of safe cycle routes (and cycle rack locations) and improved pavements.
- Retaining and improving our community facilities.
- Encouraging a more appropriate mix of housing types, not just flats.
- Encouraging new building designs to be carbon neutral.

LOCAL PLAN SECTION 3 – VISION & OBJECTIVES

There are two overarching areas of concern for **Highcliffe & Walkford Parish Council (HWPC)**, which reflect the concerns shared across the Christchurch wards and parishes.

1: The ‘City Region’ aspiration

The City Region aspiration – a flawed aspiration in our view - is driven by the Bournemouth part of BCP Council. As you know, Bournemouth is applying for City Status, a project which both Poole and Christchurch declined to participate in.

The three towns are very different in character, but the greatest difference is between Bournemouth and Christchurch. While Bournemouth may (not unfairly) consider itself a city in all but name, Christchurch is a small coastal town which includes large rural areas.

The City Region aspiration is clearly not shared or desired by Highcliffe & Walkford. It is completely at odds with the character and culture of our town and its parishes and is unacceptable to residents.

In 2018, 84% of the 21,000 Christchurch residents who took part in the local referendum, voted *against* the merger with Bournemouth, and local feeling has not changed. Indeed, the fears which residents had about the merger are exacerbated by this highly worrying objective.

We do not wish to stand in the way of Bournemouth’s internal city aspirations. But if the Local Plan is to be for the benefit of all three towns, then it **must** ensure that the three towns are differentiated, and their individual differences and needs are respected. That means differentiated policies and proposals, to protect the individual characters of Highcliffe & Walkford and other Christchurch parishes.

To take just one example: the section entitled “*Harnessing the potential of our coastline.*” The vague statement set out here could mean many things to many people.

Many residents and visitors will be more familiar with Bournemouth and Poole, which are designed to attract and deal with millions of visitors, and events such as the Air Festival, Sand Polo and the High Tide Festival.

However, Highcliffe’s coastline, and indeed the overall borough seascape, cannot cope with such volumes, and will need very different policies and protections.

It is noted that just along the coastline in Southbourne, construction of a new restaurant and 17 overnight-stay beach lodges will begin in Autumn 2023 for an opening in 2024. Highcliffe’s coastline is very different, and as a Coastal Site of Special Scientific Interest, development is not wanted or warranted.

This City Region vision should not and must not be imposed on Highcliffe. We do not wish to be part of a city region. It is not our vision. And it will harm our parish irreparably.

2: The Big Plan

The consultation states that *“the BCP Local Plan will play an important role in fulfilling the vision of the Big Plan”*.

Yet the Big Plan itself has had no consultation, and there’s no political or public consensus.

Worse yet, when we peel back the layers of what the Big Plan ‘means’, there’s almost no concrete information regarding the effects of this. The Big Plan could mean anything. Considering its centrality to the Local Plan, this is a considerable issue.

We are also concerned that most of the content is about development. There’s almost no detail around how to address the environmental, social, inequality and public health issues facing BCP in the coming years. In this respect, the Plan shows very little creativity, imagination or (dare we say it) ambition.

To take just one example: the Council has set an objective of being carbon-neutral by 2050. This is incredibly unambitious, when other authorities in the UK and elsewhere are setting 2040, 2035 or even 2030 as their target.

The Big Plan leaves the reader with the sense that the Council’s main response to all these critical challenges is merely to build. Yet if not restrained, targeted, or moderated, this will worsen those challenges, not improve them.

It also inflates the suspicions which residents have had since 2017 – that Christchurch assets and land will be used prejudicially to fund Bournemouth development. This only underlines the need to develop differentiated policies for the three towns, so that their individual characters and environments are protected.

We also have some concerns about the commercial vehicle for the Big Plan, namely **BCP FuturePlaces**. This is an entity which is being funded by BCP Council, and thus BCP residents, but is not referred to anywhere in the consultation, and most residents are entirely unaware of it.

There are numerous concerns about FuturePlaces, around conflicts of interest, budget & spending, and control of activities. Currently we are aware that the registered directors of FuturePlaces are the leaders of BCP Council, however no other local parties, groups or interests are being involved.

What little we do know is worrying, and the more information that enters the public domain, the more it appears that the Big Plan may simply represent the business plan for BCP FuturePlaces. Clearly this is a matter that ought to be communicated to and understood by all residents across the conurbation. For residents of Christchurch, who have never desired this plan, it is a matter of tremendous concern.

SECTION 4.1 – REGENERATING OUR TOWN CENTRES

General comments

The Highcliffe village centre has numerous challenges in terms of the environment and traffic and the HWPC has drawn up its own proposals with the help of consultants. At the time of writing the Revitalisation ideas are under consultation with the business community.

Issue: Regenerating our town centres

Comment: The HWPC Neighbourhood Plan emphasises the importance of a hierarchy of retail destinations and the need for regeneration to cater for residents' needs in our area. Otherwise, residents may choose other options including retail parks/out of town facilities and indeed other centres.

Issue: Vibrant local communities

Comment: We fully support the provision and protection of local open spaces and diverse community facilities.

It is essential that such facilities are always appropriate to the local area.

SECTION 4.2 – NEW MARKET AND AFFORDABLE HOMES

Issue: The number of homes we need

Option: We support **Option 2** – the lower figure of 25,600 homes.

Comment: The UK Government's higher target has been widely called into question, and by the next election this could be revised down anyway.

The environmental and climate targets set elsewhere by BCP Council would be supported by protecting as much of our Green Belt and other green spaces as we can. Indeed, this becomes more imperative as time goes by.

It would be more reasonable to adopt the lower figure and give time to provide more imaginative and effective policies and solutions to housing challenges.

The focus should be on brownfield sites and examination/assessment of land identified in the call for sites.

Suggestions of higher density and taller buildings in the zone identified in Highcliffe are not acceptable and HWPC objects to this suggestion.

This would work directly against the objective set out below to secure more family homes and would not assist in increasing the vibrancy and vitality of the community.

In addition, there is little or no capacity to provide the additional medical services required for an increased older age cohort.

The option of large areas of green belt being released for development are not acceptable in Highcliffe nor the option of allowing more homes in conservation areas. HWPC opposes any loss of green belt.

In line with the Neighbourhood Plan, Chewton Farm area/Chewton Bunny and Cranemoor Avenue woodland should remain Green Belt. The former serves as an important part of the Highcliffe green corridor and as separation from the New Milton urban area and an amenity area. They provide a vital separation of the two urban areas of Highcliffe, and loss of the green belt would lead to urban sprawl.

These areas are a wildlife corridor connecting the New Forest area to the coastal fringe, and a natural environment to be protected and enhanced.

The Cranemoor Avenue Woodland is a heavily wooded area, a haven for wildlife, environmentally sensitive and is connected to the New Forest to the north.

Finally, the Parish Council notes that BCP's consultants say the future house-building target should be 1600 new homes every year as opposed to the government's target of 2667. The Local Plan is based on the lower figure, but if the Inspector disagrees once the plan is submitted, then all the work consultation, fees, and expense will be wasted if this calculation is turned down. Then it will be back to square one.

It is therefore crucial that proper time is taken to build a case for this lower figure, and that the Local Plan is not rushed through to meet an artificial timescale.

Issue: Where new homes could be built

Comment: As the 'retirement capital' of the BCP area and with one of the oldest populations in Western Europe, Highcliffe and Walkford faces unique issues in the provision of new housing in terms of the type of accommodation and existing and future pressures.

The three main sites are:

- Roeshot Hill: Principally the Christchurch Urban Extension and the Hoburne Farm Estate (mostly developed)
- Roeshot Allotments: This is under parish ownership, and we do not wish to see any change to its status.
- Hoburne Park: Existing caravans and lodges on the leisure park is a possibility.

Issue: How to provide affordable housing

Comment: No observation

Issue: Providing custom self-build housing plots

Comment: No observation

Issue: Providing the right mix and type of homes

Comment: Highcliffe and Walkford has 120 blocks of flat/apartments south of Lymington Road and a significant number to the north. In the main these are occupied by retired/semi-retired residents or by those using them as second homes and therefore add little to the community. Similarly, there are many bungalows catering for the same market.

A focus on high-quality family homes with gardens is required to ensure a balanced, vibrant, and stable community.

Highcliffe requires a vibrant mix of housing, not a concentration of flats. Almost 250 flats have been granted consent in the past three years. There are currently 40 flats on the market locally, demonstrating a low uptake. In addition, an increase in the age cohort will increase pressure on the centre and medical facilities.

The Covid pandemic has demonstrated the desire for properties with open space.

Issue: Providing homes for older people and those with disabilities

Comment: No observation in view of the above

Issue: Student accommodation

Comment: No observation

Issue: Pitches for gypsies, travellers and travelling show people

Comment: No suitable sites in Highcliffe and Walkford

SECTION 4.3 – A PROSPEROUS ECONOMY

General comments

This goal is clearly key for all our residents and the future vitality and vibrancy of our community.

Issue: Bringing forward strategic employment sites

Comment: Significant infrastructure improvements are required. The A337 and Ringwood Road are the main travel corridors to New Milton and Lymington and are already heavily used by commercial traffic. The A35 which borders the HWPC area will also require investment particularly when the Christchurch Urban Extension is developed.

Issue: Protecting existing employment areas

Comment: Grove Road and Airspeed Road employment areas must be protected.

Issue: Isolated employment sites

Comment: Noted

Issue: Visitor accommodation

Comment: A changing hospitality market and visitor expectations as well as Covid have led to a reduction in traditional bed and breakfast accommodation. Budget style accommodation has gained a foothold. Highcliffe is not identified as a 'new build' hotel accommodation.

Issue: Visitor attractions

Comment: The principal attractions in HWPC area are Highcliffe Castle, the coastline, and beaches. Further afield the New Forest brings visitors to the area. Visitor parking in accessible public car parks should be the key strategy, which should deter parking in residential roads in the busy summer months.

SECTION 4.4 – ADAPTING OUR HIGH STREETS AND RETAIL AREAS

General comments: The principal objectives of HWPC in this regard are (i) retaining a healthy mix of retail and other uses within the high street on Lymington Road and (ii) the

improvement of the High Street environment. HWPC has been working on its own Revitalise Plan since 2019, and this is currently under consultation with the business community.

The success of the small retail parades at Ringwood Road, Walkford, and Saulflands near Hoburne is important to HWPC and its communities.

Issue: Proposed hierarchy of retail centres

Comment: Highcliffe is identified as a *minor district centre*, but in our view it requires a stronger/more appropriate designation. There are currently around 120 frontage retail/business units in the high street, with a very low void rate.

Several frontage buildings are vacant pending redevelopment following the grant of planning consent.

Issue: Town centre boundaries and primary shopping areas

Comment: With respect to Highcliffe, the existing boundaries should be retained.

Issue: Vibrant centres: The risk of change of use from Class E (shops, professional services, restaurants, offices, light industrial, clinics, creches and gyms) to residential will potentially have a damaging effect on the vitality of the district centre if the retail frontage is broken up.

SECTION 4.5 – A SAFE, SUSTAINABLE & CONVENIENT TRANSPORT NETWORK

General comments

We support measures that will ease congestion, improve the environment including air quality and promoting safe, sustainable, and connected ways of moving around, especially regarding public transport.

Central to this, across the wider conurbation, it is critical to reduce the number of car journeys which are taken, and to have a transport policy which focuses on this.

Issue: Our future transport strategy

Comment: Improvements are required for the A337 Lyminster Road, a heavily trafficked/congested main route.

Issue: Transport infrastructure

Comment: Better and more frequent services are needed from Hinton Admiral Station.

Later bus services through Highcliffe will also better support working residents.

The South-East Dorset Metro-Link proposal linking New Milton with Poole based on the existing rail infrastructure should be given serious consideration and built in to future plans.

Issue: Transport impacts from new development

Comment: The Christchurch Urban Extension and Hoburne Farm phases 8 and 9 will add around 2,000 new homes. Significant highways improvements will be needed for both network capacity and road safety reasons.

SECTION 4.6 – OUR NATURAL ENVIRONMENT

General comments

Ecological networks.

We must object to a major **error** in the Highcliffe section of the map for '*Ecological Networks*'. For reference, we paste the relevant map below.

The item marked 1 here is **St Mark's Churchyard** woods.

The items marked 2 and 3 here are **Jesmond Avenue** woods.

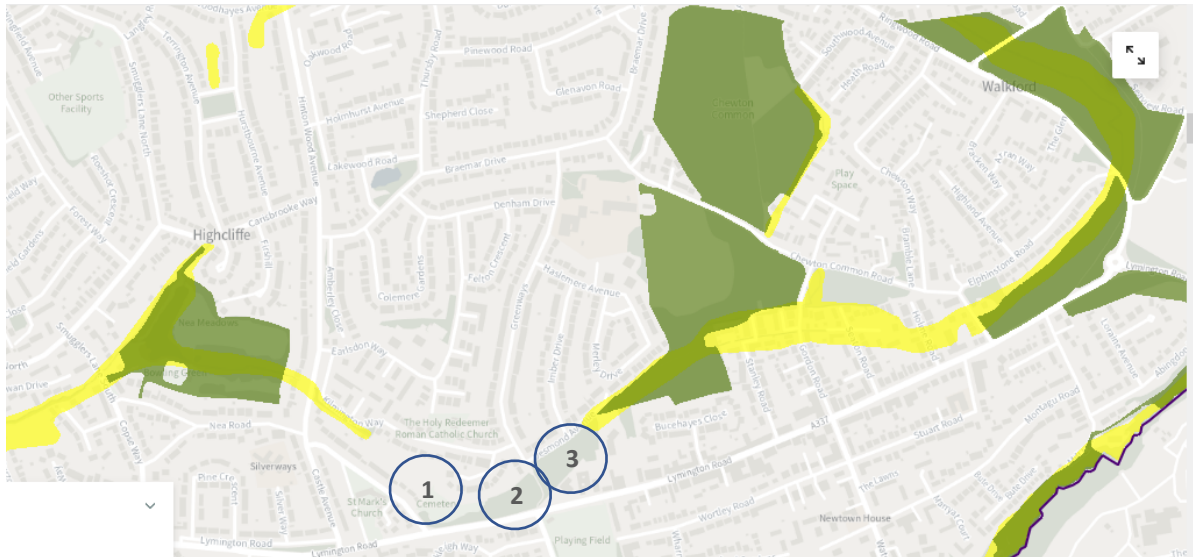
These are part of the **Highcliffe Green Corridor**, a wildlife corridor designated and protected since 2001 under local policy ENV15. This policy identifies the area from Nea Meadows to Chewton Common as forming a linked wooded habitat and preserves the link together. The ongoing HWPC Neighbourhood Plan identifies these areas as Local Green Spaces for continuing protection.

Jesmond Avenue woods has been proven to be habitat for endangered birds, bats, reptiles, flora, and veteran trees.

There is clearly an error, as these are not identified here as '*existing ecological network*'. However, the greater fear is that these and other areas are not marked as '*proposed*' either.

The wildlife corridor is not just a critical habitat for protected species but has been proven to be popular with residents: evidenced in the survey taken for HWPC's Neighbourhood Plan.

For the avoidance of doubt, all land marked as '*existing*' in Highcliffe, together with items 1, 2 & 3 below, **must** all be additionally marked as '*proposed*', and their protections retained.



Issue: Conserving and enhancing biodiversity and geodiversity

Comment: We support any measure to protect biodiversity, which is critical to meeting environmental and climate challenges.

Our point above regarding Ecological Networks also applies here.

Issue: Protecting Dorset Heathlands and mitigating development impacts

Comment: We support continuing measures to protect Dorset Heathlands regions.

Issue: Provision of strategic Suitable Alternative Natural Greenspaces (SANGs)

Comment: There are some concerns about the extended use of SANGs.

Obviously, the loss of an existing mature woodland cannot be offset by the planting of saplings on a golf course. The natural environment performs various complex functions, including habitat and corridor, and cannot be traded in this way, especially where the biosphere is not able to relocate.

We propose that policies are put in place to ensure that SANGs are applied meaningfully and not used in scenarios which would mean loss of habitat, corridor or biodiversity.

Issue: Improving the air quality on the Dorset Heathlands

Comment: We support this objective.

Issue: Dealing with Poole Harbour Recreational Pressures

Comment: We support this objective.

Issue: Dealing with Poole Harbour Nitrate Pollution

Comment: We support this objective.

Issue: Supporting green infrastructure and open space

Comment: We support the general objective to maintain and expand the Green Infrastructure Network.

We additionally note that under the **HWPC draft Neighbourhood Plan**, we have identified a network of Local Green Spaces. These will attract a specified level of protection, and we would expect to see that protection also specified in the BCP Local Plan.

The **HWPC draft Neighbourhood Plan** is enclosed with this submission.

Option 1: We strongly disagree. The loss of open space is contrary to environmental objectives.

Option 2: We strongly disagree. See above.

Option 3: We note that this proposal should not be applied to allow a developer to build on any existing open space or green infrastructure. The compensation measure should not be exploited to facilitate environmental reduction.

SECTION 4.7 – OUR BUILT ENVIRONMENT

General comments

HWPC strongly objects to and disagrees with the suggestion that part of Highcliffe is suitable for a change of character.

Issue: Ensuring good place making and urban design

Comment: HWPC stresses the importance of the National Design Guide and the quality and character of the existing area.

Issue: Planning for urban intensification (potential change of character)

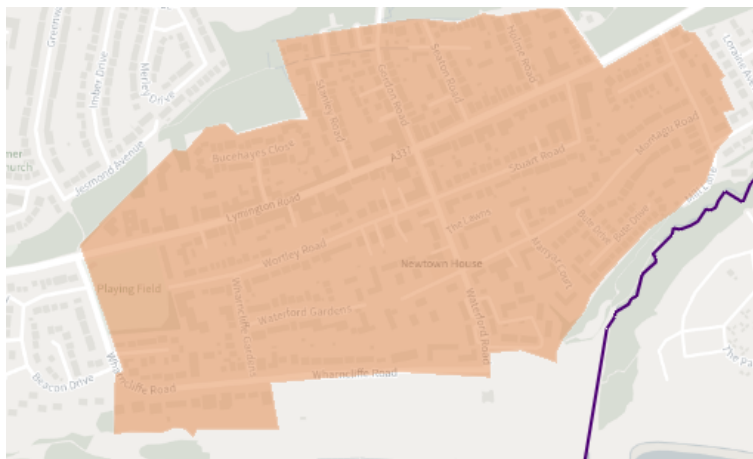
Comment: we *strongly disagree* with item (n) – Lymington Road area, Highcliffe.

The area marked on the map is the largest ‘potential change of character’ region in all BCP (see map below). Yet this is in Highcliffe, a quiet residential coastal village, and the marked area includes green spaces as well as numerous established residential streets.

While we acknowledge that parts of the high street itself are undergoing redevelopment, the same cannot and should not be said of the rest of this vast area.

We are highly concerned and confused at this proposal. To redevelop the whole marked area would cause untold damage to the character of Highcliffe, and years of distress to residents. It would also contradict several proposed objectives, including the aim to preserve coastal views.

We argue this must be in error, and that the entry should be reduced to show the high street **only**.



Issue: Tall buildings

Option: We support **Option 1:** restriction of tall buildings to Bournemouth and Poole centres only.

Comment: Christchurch does not have the same character as the other towns and must be treated differently in this respect. It would be completely out of character in the Christchurch area and would certainly destroy the local character of Highcliffe.

Issue: Preserving and enhancing our heritage

Option: We do not support **Option 2.**

Comment: Undertaking a comprehensive review of conservation areas would have a significant impact on the Verno Lane Conservation Area and Hoburne Developments' phase 9 proposals. Listed buildings are noted – which include several mile posts.

In the Chewton Farm Road Conservation Area, several new planning applications and developments have been highly controversial. We do not believe these consents would have been granted before 2019.

Issue: Preserving coastal and landscape character

Option: We support **Option 1**.

Comment: The Highcliffe to Milford Cliffs SSSI is to remain as it is. No beach hut/overnight beach hut development or other intrusive development should be permitted.

SECTION 4.8 – PROMOTING HEALTH AND WELLBEING

General comments

This is vital for all members of our community, with a wide age range and a significantly older demographic.

Issue: Supporting health and well being

Comment: Roeshot and Walkford allotments are key to meeting this objective, along with Highcliffe Recreation Ground, Wharncliffe Road open space, Chewton Bunny, play areas and natural open spaces including Nea Meadows, Lakewood – these are all facilities promoting health and wellbeing.

Issue: Ensuring a high standard of amenity

Comment: Community facilities must meet National Design Guide standards and the preference is for high-quality homes with gardens as opposed to flats.

SECTION 4.9 – TACKLING CLIMATE CHANGE

General comments

HWPC supports the objectives of BCP Council regarding climate change targets.

Issue: Ensuring new buildings will be built to reduce their energy use and minimise carbon emissions

Option: We support **Option 2**.

Comment: We should be striving to provide genuinely high-quality housing for our residents.

Issue: Maximising the uptake of energy from renewable sources

Comment: We agree with the desirability of appropriately located solar panels and PV generation farms to assist in achieving renewable energy targets. Electric vehicle charging points in public car parks are needed in the HWPC area.

Issue: Flood and coastal erosion risk management

Comment: Improved flood resistance measures are needed to Bure Brook. Ongoing coastal erosion protection is needed for the parish area coastal frontage. The replenishment of the beaches and other appropriately timed significant works are required to protect homes and businesses.

SECTION 4.10 – PROVIDING INFRASTRUCTURE

General comments

There are significant areas of concern in terms of infrastructure around general improvements to the highway network and the requirement for additional/ extended/ improved facilities (medical, education and community/recreational) arising from future and planned development, including the urban extension.

Issue: Delivering the infrastructure to support growth

Comment: Significant improvements are necessary on the A337 and A35 to ensure effective, efficient, and safe connectivity across the parish and wider conurbation. The Seafront Strategy is awaited from BCP Council. The HWPC Neighbourhood Plan identifies important facilities to be enhanced/retained/provided.

Issue: Balancing the delivery of infrastructure with viable development

Comment: The viability assessment proposed needs detailed assessment.

Issue: Telecommunications and digital infrastructure provision

Comment: A BCP development guideline is required for operators to assess the impact of transmission equipment.

Issue: Community facilities and services

Comment: Protection for community-based sports and recreation facilities is a key priority as noted in the Neighbourhood Plan.

EXECUTIVE SUMMARY

In summary, Highcliffe & Walkford Parish Council would like to make the following headline statements on behalf of its residents:

- We feel the **consultation process** was poorly executed, too short, and disincentivising for residents who could not access the internet, or lacked the technical skills to complete a complicated online form. BCP Council did respond to public pressure, and provided a few drop-in sessions, as well as adjusting the deadline and submissions criteria. But in our view this was too little, too late.

Future consultations should not be done like this, and we have made recommendations accordingly (see above).

- We oppose the City Region aspiration of BCP Council's leadership. We believe the individual needs and differences of Highcliffe and Christchurch must be protected and respected.
- We are greatly concerned about the implications of the Big Plan, and call for much more clarity about what it means for Christchurch. We note that there has been no consultation on this plan.
- In terms of the target figures for house-building, we support the lower figure (Option 2).
- We oppose development in the Green Belt and on ecological networks.
- We believe substantial investment is required in infrastructure, including road improvements and additional medical, educational and community facilities.

- We draw your attention to the land identified in the Neighbourhood Plan as forming Highcliffe's green/wildlife corridor (from Nea Meadows to Chewton Common). This is to be designated as Local Green Space, as indeed are a number of other ecological sites around Highcliffe & Walkford. These should be similarly designated in the Local Plan.
- We strongly oppose any change of character to Highcliffe as suggested in the consultation.
- We strongly oppose the development of tall buildings in Christchurch and agree that these should be restricted to Bournemouth and Poole.
- We oppose a comprehensive review of conservation areas, which would have a significant potential impact on the Verno Lane Conservation Area.

HWPC Local Plan Working Party

March 2022

Cllr Andy Martin (chair)

Cllr Willie McNeill

Cllr Peter Cranham

Cllr Nigel Brooks

Mr Adam Sofianos