30/2007/006

JOHN BIRCH

CHANGE OF USE OF AGRICULTURAL LAND FOR THE PROVISION OF 4 PITCHES FOR GYPSY OCCUPATION TO PROVIDE UP TO 1 CARAVAN AND 1 TOURING CARAVAN FOR EACH PITCH AND ASSOCIATED CAR PARKING AT FOSGROVE PADDOCK, SHOREDITCH AS AMENDED BY PLAN RECEIVED 12TH SEPTEMBER, 2007 AND ADDITIONAL SUPPORTING INFORMATION

322880/120640

FULL

PROPOSAL

A 10 year planning permission was granted in 1997 for the provision of a site for a mobile home for a single gypsy family at Fosgrove Paddock, Shoreditch. In 2002 planning permission was granted for this use to become a permanent use of the site and for an additional 2 towing caravans to located on the site. This application is for the provision of four additional pitches at the site to accommodate the family's son, daughter, mother and brother. The additional pitches would be located to the south of the current site with proposed landscaping around the new pitches. To the east of the site is an access track and footpath. The additional pitches would be accessed off this track to the south of the existing gypsy pitch.

CONSULTATIONS AND REPRESENTATIONS

COUNTY HIGHWAY AUTHORITY the site is remote from any urban areas and therefore distant from adequate services and facilities, such as education, employment, health, retail and leisure with poor public transport services and would be likely to result in additional need to travel by private vehicle and the development would be contrary to Government Advice within PPG13, RPG10, and the provisions of policies STR1, STR6 and 36 of the Somerset and Exmoor National Park Structure Plan Review. What was not referred to by the Highway Officer in the earlier decision on this site (2002) was that the approach roads to the site are narrow and poorly aligned, unlit and offer no protection for pedestrian traffic accordingly I recommend refusal of this application for the following reasons:- Contrary to policies STR1, STR6 and 36 of the Somerset and Exmoor National Park Structure Plan Review and approach road by reason of restricted width, poor alignment, lack of footways and lighting is considered unsuitable to serve as a means of access to the proposed development. COUNTY GYPSY LIASION OFFICER accepts that these are gypsy families and supports their application for additional pitches for extended family use. EDUCATION OFFICER no response. SOCIAL SERVICES no response. FOOTPATHS OFFICER there is a public right of way along the access track to the east of the site. Works to this right of way including (1) the route being less commodious for continued public use; (2) new furniture being needed along the public right of way (PROW); (3) changes to the surface of the PROW being required; (4) changes to existing drainage for the PROW. If the proposal makes a PROW less commodious for public use or presents a hazard to users a temporary closure may be required and an alternative route provided.

LANDSCAPE OFFICER the proposal would have a significant landscape impact from the local lane and public footpath. The proposed landscaping would help to soften the impact but not sufficiently to meet the policy requirements of EN12 views on amended scheme awaited. FOOTPATHS OFFICER view on amended plan awaited. POLICY written views awaited

PITMINSTER PARISH COUNCIL the proposal does not conform to Taunton Deane Local Plan Policy H14 as it does not provide safe and easy access by bus, cycle or foot to schools or other community facilities. Furthermore, access to and from the site is via an unlit narrow country lane with frequent bends and no footpaths or speed restrictions and increased use that would result from this proposal would be dangerous to existing and proposed users. In a previous planning appeal the Secretary of State considered that the use of the highway with no footpath or speed restriction cannot be described as safe and convenient; the proposed landscaping is wholly inadequate to screen the site; the site lies within a Landscape Character Area and is situated beneath the Blackdown Hills Scarp, an AONB and it is considered that this proposal; will be intrusive into this area and detrimental to those qualities; no new fencing has been proposed.

TRULL PARISH COUNCIL considers that the proposal would have a detrimental impact on the area and the community within and objects most strongly to the 6 additional pitches application. Comments on the reduced proposal for 4 family pitches awaited.

CORFE PARISH COUNCIL the site is in open countryside where other development would be rejected out of hand. The precedent that would be set if permission is granted would raise the price of farmland in the area for speculative development; the highway network to access the site is totally unsuited to accept any additional residential traffic and the visual impact on the edge of the Blackdowns AONB, and upon the unspoilt scenery of this area is unacceptable.

ADJACENT WARD COUNCILLOR the proposed layout gives a suburban impression in the countryside; in terms of the circular 1/2006 advice:- Clauses 20 and 21 A gypsy and traveller accommodation assessment has been undertaken as part of an overall Housing Needs Strategy and should be used to assess the need across the district to see if this proposal would meet a genuine need or is purely a commercial development; Clause 47 and 48 states that exception sites are permissible to fulfil the need for gypsy sites. Clause 48 states that such sites should be identified as being for such a need and that rural exception site policies should operate in the same way as those for housing and that the provision should be in perpetuity and seek to address the needs of the local community by accommodating households who are either current residents or have existing family or employment connections and continue to develop sustainable mixed inclusive communities. Is this development going to be linked to a housing organisation to secure its long term use? Clause 54 Whilst accepting the principle of a rural location for gypsy sites it goes on to say that such sites shall respect the scale of and not dominate the nearest existing community and shall not put undue pressure on the local infrastructure, I consider that the proposed 7 additional pitches is a gross overdevelopment of that community that will put undue pressure on the local infrastructure because of the lack of local services and extremely narrow access road; Clause 65 and 66 requires Local Authorities should first consider locations in or near existing settlements with access to local services and that any allocated site must have its social, environmental and economic impacts in terms of sustainability, Clause 66 also states that sites should be identified having regard to highway considerations. In this site the roads are narrow with no public transport or footpaths and the site does not have easy access to local services, finally I would comment that a new access on the western boundary of the site abutting Fosgrove Lane, this is not referred to in the application and it should be considered by the relevant authority before it is allowed to remain.

48 LETTERS OF OBJECTION have been received raising the following issues:- the increased traffic on the narrow roads in the area will be detrimental to the safety of pedestrians, cyclists and other road users; the site is by a blind corner and increased traffic movements will be dangerous; the caravans will spoil the beautiful, quiet countryside in this area; the bridleway running along the side of the site has already been blocked by vans and increased occupation of this site would result in the bridleway being blocked more often; emergency vehicles find it difficult to get around the acute bend in the road and will find it hard to reach this site; the proposal is for a commercial enterprise and not for existing family need; the site is on the edge of the AONB and the proposed caravans will not enhance the area as required by the local plan policy but will be detrimental to that landscape; this is an agricultural area and should remain for such uses; the proposal will result in increased rubbish and mess in the area; additional gypsies at the site will reduce price values; this is a small rural hamlet and the additional number of occupants will result in an over-dominance of gypsy people that will outbalance the settled community contrary to advice within Circular 1/2006; the proposal will resulting social, cultural and environmental changes detrimental to the existing balance of the area; the existing residents have two dogs that can frighten users of the adjacent footpath; this proposal, if allowed, will set a precedent for more gypsies in the area with a predominant impact on the existing community and increasing highway danger; the site is within and would be visually detrimental to the landscape character area; this is a commercial venture and does not result from a real need of existing, local gypsies; there are no local services and new occupants will have to drive to the nearest services; the proposal will put more demands on existing services and who will pay for this?; the proposal is for 4 static and 4 mobile caravans resulting in up to 32 extra people and private field access has no permission for such use; legislation requires consideration of the relationship of the proposal to the size of the existing community in this case the numbers would dominate the immediate locality; previous consideration of the original application for gypsy occupation considered 1 site appropriate and no more; Local Planning Authority cannot lower highway standards; need does not override the Local Plan policies; Local Planning Authority not empowered to grant permission contrary to policies and government advice; the gypsies needing to settle here should go on the housing list like everyone else; there are sufficient gypsy sites within Taunton Deane without the need for more; settled occupants have been verbally abused and threatened whilst the application has been considered; the proposals are likely to result in an increased security risk for property and possessions; the safety of pedestrians using the track and farm machinery cannot be guaranteed with the additional use; no confidence that this application has been handled correctly; the application should include the details of the access as this is

clearly a new consideration; the revised site will be visible from the motorway and the Blackdown Hills and CPRE, The Blackdown Group, the Environment Agency and DEFRA should be consulted; the proposal will create a precedent for future use of adjacent land; this is on the edge of an AONB in a remote location and is not suitable for such a use; any permission cannot limit the permission to members of the Birch family now or in the future; the gypsy population will outnumber the immediate local community; the needs of the rest of the community are being ignored - the settled population cannot have new houses for family members.

1 LETTER OF SUPPORT has been received from the Somerset Gypsy Advisory Group raising the following issues:- the Birch's site is always clean and tidy and this application will enable accommodation for their extended family, in line with the gypsy way of life; there are no vacancies on Council run sites; this proposal is line with Government advice to provide small private sites; this application has been submitted before any unauthorised occupation as Mr Birch wants to follow the rules; the complaints are mostly from people who live at some distance from the site; the accommodation will not devalue existing properties as the Birches are pleasant people and a nice family; they have lived on the site for over 10 years and this is their home; the site would be well laid out and tidy; gypsies always drive with great care as they have families themselves; the public right of way will not be hindered by the sites as they will be screened and kept private; the family are law abiding people who just want to live on their land with their own family members retaining their Romani culture; they have the full backing of the Romani Advisory Group.

3 LETTERS OF SUPPORT have been received raising the following issues:- it is important to be able to live close to your parents to help to look after them as they get older; the site is ideal as it is well screened and close to the town and much better than the waste land gypsies normally have to pull onto; the gypsy community needs family sites like this; the site has a good access

POLICY CONTEXT

Somerset and Exmoor National Park Joint Structure Plan Review

POLICY STR6 - Development Outside Towns, Rural Centres and Villages.

Development in the Countryside will be strictly controlled to that which benefits economic activity, maintains or enhances the environment and does not foster growth in the need to travel.

POLICY 5 - Landscape Character

The distinctive character of the countryside of Somerset and the Exmoor National Park should be safeguarded for its own sake. Particular regard should be had to the distinctive features of the countryside in landscape, cultural heritage and nature conservation terms in the provision for development.

POLICY 36 - Sites For Gypsies and Travelling People

The provision of sites for gypsies and other travelling people should be made where the site is within reasonable distance of a settlement providing local services and facilities.

POLICY 49 - Transport Requirements of New Development

Proposals for development should be compatible with the existing transport infrastructure, or, if not, provision should be made for improvements to infrastructure to enable development to proceed. In particular development should:-

- (1) Provide access for pedestrians, people with disabilities, cyclists and public transport;
- (2) Provide safe access to roads of adequate standard within the route hierarchy and, unless the special need for and benefit of a particular development would warrant an exception, not derive access directly from a National Primary or County Route; and,
- (3) In the case of development, which will generate significant freight traffic, be located close to rail facilities and/or National Primary Routes or suitable County Routes subject to satisfying other Structure Plan policy requirements.

Taunton Deane Local Plan

Taunton Deane Local Plan. The following policies are considered especially relevant:-

S1 General Requirements

Proposals for development should ensure that:-

- (A) additional road traffic will not lead to overloading of access roads or road safety problems;
- (C) the appearance and character of any affected landscape, settlement, building or street scene would not be harmed as a result of the development;
- (E) potential air pollution, water pollution, noise, dust, glare, heat, vibration and other forms of pollution or nuisance, which could arise as a result of the development will not harm public health or safety, the amenity of individual dwellings or residential areas or other elements of the local or wider environment;
- (F) the health, safety or amenity of any occupants or users of the development will not be harmed by any pollution or nuisance arising from an existing or committed use.

S7 Outside Settlements

Outside defined settlement limits, new building will not be permitted unless it maintains or enhances the environmental quality and landscape character of the area and

(B) accords with a specific Development Plan policy or proposal;

H14 Gypsy and Travellers sites

Outside the defined limits of settlements, sites for gypsies or non-traditional travelers will be permitted, provided that:

- (A) there is a need from those residing in or passing through the area;
- (B) there is safe and convenient access by bus, cycle or on foot to schools and other community facilities;
- (C) a landscaping scheme is provided which screens the site from outside views and takes account of residential amenity;
- (D) adequate open space is provided;
- (E) accommodation will enjoy adequate privacy and sunlight;
- (F) accommodation for incompatible groups of gypsies and/or non-traditional travellers are not mixed on the same site;
- (G) areas for business, where appropriate, are provided within sites, with satisfactory measures for their separation from accommodation spaces and the safety and amenity of residents; and
- (H) in the case of transit sites, there is convenient access to a County or National route;
- the site is not within an Area of Outstanding Natural Beauty or a Site of Special Scientific Interest, or would harm the special environmental importance of any other protected area;
- (J) adequate fencing, capable of preventing nuisance to neighbouring areas, is provided.

EN12 Landscape Character Areas

Development proposals must be sensitively sited and designed to respect the distinct character and appearance of Landscape Character Areas.

Executive report dated 3rd May 2006 - Providing for Gypsies and Travellers

Impact of Circular 01/2006 on the Determination of Planning Applications.

However, in light of the new Circular the criteria may need to be considered more flexible in cases where an identified need has been established. The fact that a site may be in an area with a landscape, wildlife or conservation designation should no longer in itself be a reason for refusal, unless it can be demonstrated that the development would undermine the objectives of that designation. A more flexible approach should also be taken in terms of distance to local facilities. Whilst sites immediately adjoining settlements may best meet sustainability criteria they can also give rise to other problems, particularly in relation to impact upon residential amenity.

Circular 01/2006 identifies the issue of the scale of sites in relation to existing settlements. Large-scale gypsy sites should not dominate existing communities. In implementing Policy H14, the relative size of any proposed site in relation to nearby settlements must be taken into account.

RELEVANT CENTRAL GOVERNMENT GUIDANCE

Up to date Government advice is contained within ODPM Circular 01/2006 Of particular relevance are paragraphs referred to below

Paragraph 4

This circular will help to promote good community relations at a local level, and avoid the conflict and controversy associated with unauthorised developments and encampments

Paragraph 12 The Circular's main intentions are;

- (a) to create and support sustainable, respectful, and inclusive communities where gypsies and travellers have fair access to suitable accommodation, education, health and welfare provision; where there is mutual respect and consideration between all communities for the rights and responsibilities of each community and individual; and where there is respect between individuals and communities towards the environments in which they live and work;
- (b) to reduce the number of unauthorised encampments and developments and the conflict and controversy they cause and to make enforcement more effective where local authorities have complied with the guidance in this Circular;
- to increase significantly the number of gypsy and traveller sites in appropriate locations with planning permission in order to address under-provision over the next 3-5 years;
- (d) to recognise, protect and facilitate the traditional travelling way of life of gypsies and travellers, whilst respecting the interests of the settled community;
- (e) to underline the importance of assessing needs at regional and sub-regional level and for local authorities to develop strategies to ensure that needs are dealt with fairly and effectively;
- (f) to identify and make provision for the resultant land and accommodation requirements;
- (g) to ensure that DPDs include fair, realistic and inclusive policies and to ensure identified need is dealt with fairly and effectively;
- (h) to promote more private gypsy and traveller site provision in appropriate locations through the planning system, while recognising that there will always be those who cannot provide their own sites; and
- (i) to help to avoid gypsies and travellers becoming homeless through eviction from, unauthorised sites without an alternative to move to.

Paragraph 19

A more settled existence can prove beneficial to some gypsies and travellers in terms of access to health and education services and employment and can contribute to a greater integration and social inclusion within the local community.

Nevertheless the ability to travel remains an important part of their culture. Some communities of gypsies and travellers live in extended family groups and often travel as such. This is a key feature of their traditional way of life that has an impact on planning for their accommodation needs.

The scheme of C1/2006 is that all local planning authorities must carry out Gypsies and Travellers Accommodation Assessment (GTAAs) to ascertain the need for pitches in their districts. These must be submitted to the relevant regional authority. The regional authority will use the information from the GTAAs to impose quotas of gypsy pitches on all the districts in the region. Each district will be obliged to allocate sufficient land in their Development Plan Documents (DPDs) to meet its quota. The circular contemplates that this process will lead to the provision of an adequate number of gypsy sites.

C1/2006 sets out what is calls 'transitional arrangements" to govern the period before quotas are imposed by the relevant regional authority (paragraphs 41-46). In certain circumstances it may be necessary for local planning authorities to make allocations in this period. Further, in districts where there is a clear need for additional sites and a likelihood that allocations will be made within a defined period, it may be appropriate to grant temporary planning permissions for gypsy sites.

Paragraph 48

In applying rural exception site policy, local planning authorities should consider in particular the needs of households who are either current residents or have an existing family or employment connection.

Paragraph 53

However, local landscape and local nature conservation designations should not be used in themselves to refuse planning permission for gypsy and traveller sites.

Paragraph 54

Sites on the outskirts of built-up areas may be appropriate. Sites may also be found in rural or semi-rural settings. Rural settings, where not subject to special planning constraints, are acceptable in principle. In assessing the suitability of such sites, local authorities should be realistic about the availability, or likely availability, of alternatives to the car in accessing local serviced. Sites should respect the scale of, and not dominate the nearest settled community. They should also avoid placing an undue pressure on the Local infrastructure.

Paragraph 60In particular questions of road access, the availability of services, potential conflict with statutory undertakers or agricultural interests and any significant environmental impacts should be resolved at the earliest opportunity...

Regional Spatial Strategy (RSS)

The regime of the Planning and Compulsory Purchase Act 2004 provides for Regional Spatial Strategy (RSS) to be formulated by the regional authority, the South West Regional Assembly. This Authority is to determine the amount of provision within each district for additional gypsy and traveller sites.

In April 2006 the Regional Assembly published a draft RSS of which paragraph 6.1.1.13 states 'at the time of publication of the draft RSS the RPB was of the view that there was not sufficiently robust information on which to establish district level numbers, that it is necessary to establish transitional arrangements in accordance with C1/2006 and that there will be an early review of the draft RSS 'to fully implement the Government's requirements' (i.e. to impose quotas).'

For the South West, this regional context can be summarised as follows:-

- The extent of existing provision in the region is approximately 550.
- The following parts of the region have relatively high numbers of unauthorised sites; South Gloucestershire, City of Bristol and North Somerset, Unitary Authority areas, and parts of Devon, Gloucestershire and Dorset counties.
- An interim estimate of the additional pitch requirements at regional level is about 1,100 pitches which will be used to monitor delivery in LDDs.

Regarding pitch requirements, the indicative regional figure set out above will serve as a monitoring basis until local authorities have completed their needs assessments and are able to provide a more comprehensive position for site requirements. It is anticipated that all local authorities in the region will have completed their GTAAs in 2007, and it is hoped a single issue review of the Draft RSS can be completed in step with this.

The partial revision of the RSS to review additional pitch requirements is now well underway, with public consultation on the draft Revision running until 31 October. Additional pitch requirements to 2011 are included for Unitary Authority and District Council areas. The requirement for Taunton Deane is 17 pitches, of which 8 have already been provided.

The Ark Report and the GTAA

Circular 1/2006 requires all Local Authorities to undertake a needs assessment (GTAA) for new pitches within their areas. Taunton Deane, in association with the other Somerset Local Authorities, had commissioned the Ark Consultancy to undertake a needs assessment prior to the publication of the Circular, although this did not produce specific pitch numbers. However, in response to the request for First Detailed Proposals to inform the preparation of the partial revision of the RSS, further work was undertaken to update the assessment of identified need, and produce figures. This work was undertaken by a group that included officers of the District and County Councils and representatives of the Gypsy and Traveller communities. It identified a requirement for 17 additional pitches in Taunton Deane to 2011, and was based on detailed consideration of the known situation within the Borough in terms of unauthorised sites and the circumstances of individual households.

The assessment did not identify the current gypsy family needs. However, it is recognised that the scale of need identified only reflected known needs at that time. In submitting the results as First Detailed Proposals it was recognised that the process by which the results had been produced had pre-dated the publication of the

government guidance, and that further work would be needed to produce a more thorough and robust assessment that complied fully with the government guidance on GTAAs. The implication of this is that there may have been an under estimate of the need for sites, and that additional pitches might be required in the course of time. The circumstances of the households proposed to occupy the additional pitches in this case is just the type of situation that it was anticipated might arise.

RELEVANT LEGISLATION

European Convention for the Protection of Human Rights and Fundamental Freedoms (Human Rights Act 1998)

Articles 8 and 14 of the Convention and the First Protocol Articles 1 and 2 are of particular importance in the consideration of this application.

Article 1

- 1. Everyone has the right to respect for his private and; family life, his home The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association
- 2. No person shall be denied the right to education. In the exercise of any function which it assumes in relation to education and to teaching, the State shall respect the right of parents to ensure such education and teaching in conformity with their own religion and philosophical convictions.

Case for the Applicant

The application is for 4 new pitches, each to comprise a mobile home, touring caravan and associated parking. The sites are required to provide for Mrs Birch's mother, Mrs Cooper; her 18 year old daughter, Lorna Birch; their son John Henry Birch and Mrs Birch's brother, Jimmy Cooper, his wife and three children.

Mrs Cooper currently lives in a council house in Rockwell Green. As a gypsy she has been brought up and lived in caravans. She moved into a house as there were no gypsy sites available for her to live on at the time. Living in the house has lead to depression and she wants to join her daughter at the site at Fosgrove. Mrs Cooper has Osteoporosis and spends a lot of time in the house. If she can move to Fosgrove her daughter can look after her in the gypsy way and she can be near to her grandchildren and family.

Lorna Birch is 18 years of age and wishes to set up her own pitch with her boyfriend (a gypsy) near to her parents. Apart from wishing to live near her family there are no pitches in the Taunton area for her to occupy.

John Henry Birch is 16 years of age and needs to have a pitch of his own. The gypsy family is very important and he needs to stay at Fosgrove near to his mother and father. There are no alternative pitches in the area.

Jimmy Cooper and his wife travel around the local area moving from site to site, They have no permanent site. They have three children of school age, two of whom have attended Blagdon Hill Primary School and would be welcomed back if they moved onto a permanent site in the area.

ASSESSMENT

The application site is located in the open countryside where normal policies resist the erection of new dwellings or the siting of new residential caravans. However there are exceptions to this policy including policy H14, which allows the principle gypsies and traveller sites within rural areas provided they can fulfil certain criteria. These criteria were relaxed as a result of Government advice contained within Circular 1/2006 to allow additional sites. In particular the Executive Committee agreed a more flexible approach in terms of distance to facilities and accepted that sites could be provided in areas of local landscape designation provided they do not undermine the purpose of the designation.

In terms of policy H14 I am satisfied that there is a need for the proposed pitches by family members of Mr and Mrs Birch who reside or resort to the area; that adequate open space is provided for each pitch; there will be adequate privacy and sunlight for each pitch; there is no suggestion of any business being carried on from the site; due to the hedge boundaries existing on the site I do not consider that there is a need for fencing. Regarding the siting within a landscape character area I consider that the location of the additional units is capable of being adequately screened from the surrounding countryside. Policy H14 requires a safe and convenient access to services and that they are sited near a public road. This application site is near to a public road but the Highway Authority raise objection to the location of the site on (1) sustainability grounds and (2) Highway safety grounds. Circular 1/2006 accepts that, due to the difficulty of site provision, exception sites may be non-sustainable locations and I do not consider that the distance to services and facilities is a reasonable objection to the Fosgrove Paddock site. The highways to the site are unlit, narrow and poorly aligned without footpath links and I accept that additional traffic using the roads will increase the statistical chance of an accident. However this is the case for a vast number of rural roads within the district and I consider that these concerns need to be balanced against the need for additional gypsy family accommodation at the site and the difficulty Gypsies have in finding alternative more appropriate sites. Finally Circular 1/2006 requires gypsy sites to respect the scale of the existing settled community not to dominate the existing community. Objectors to are concerned that 4 additional pitches will result in 5 families on the site in excess and out of proportion with the few existing dwellings in the locality. Indeed there are limited dwellings within the immediate locality and the insertion of additional gypsies will alter the balance between the two populations. However, I am aware that gypsies often live in family groups such as this and that as an extended family they are less likely to have an over powering impact on the settled population. As a result I do not consider that the scale of this proposal is so significant as to result in an unacceptable impact in this case. In my opinion the proposal is acceptable.

RECOMMENDATION

Permission be GRANTED subject to conditions of time limit, gypsy family members only, no more than one mobile home, one tourer caravan stationed on each pitch, retention of existing hedges, landscape scheme, no business, remove GPDO rights for fences etc, details of external lighting, entrance gates to open inwards, access drive to be provided prior to occupation and kept free from obstruction, parking.

REASON(S) FOR RECOMMENDATION:- The additional pitches are considered to fulfil an outstanding gypsy need In accordance with Taunton Deane Local Plan Policy H14 (as amended).

In preparing this report the Planning Officer has considered fully the implications and requirements of the Human Rights Act 1998.

CONTACT OFFICER: 356467 MRS J MOORE

NOTES: