

SBE14107.06

Report of an investigation under s60(2) of the Local Government Act 2000 by Bevan Brittan LLP on behalf of Stephen Whetnall, Monitoring Officer for Winchester City Council, into an allegation concerning Councillor Malcolm Wright, a Member of Winchester City Council.

5 October 2006

5 OCTOBER 2006

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1 The Allegation

- 1.1 This investigation concerns a meeting of the Winchester City Council Planning Development Control ("PDC") Committee on 16 February 2006, at which it is alleged that Councillor Malcolm D Wright ("Cllr Wright"), a Member of Winchester City Council, whilst declaring a personal interest in relation to Mr Peter Corney's ("Mr Corney") planning application for alterations to the Waller's Ash shooting ground ("the planning application"), failed to declare a prejudicial interest and withdraw from the meeting while discussion of that application took place.
- 1.2 Mr Corney's planning application was first considered at a meeting of the Council's PDC Committee on 29 July 2004. Prior to that meeting, Cllr Wright submitted a letter of objection and indicated that he wished to address the meeting in respect of the application. Mr Corney's Planning Consultant, on learning of Cllr Wright's intention to speak, objected to Cllr Wright speaking at the meeting on the basis that he was a co-owner of another local shooting club, the Rack & Manger, and that this constituted a personal and prejudicial interest. Mr Corney initially alleged that Cllr Wright failed to declare a personal and or prejudicial interest at this meeting. Cllr Wright did not however attend that meeting and Mr Corney subsequently withdrew this allegation.
- 1.3 Mr Corney's planning application was subsequently considered at a meeting of the Council's PDC Committee on 16 February 2006. Cllr Wright again registered his intention to address the meeting in respect of the application. Following this notification on 13 February 2006, Mr Corney lodged a complaint to the Standards Board for England, objecting to Cllr Wright speaking at the meeting. Since the 16 February 2006 meeting was at that stage, yet to occur, Mr Corney's complaint related to an anticipatory breach and was therefore referred back to the Ethical Standards Officer for clarification of the terms of reference of the investigation. The Ethical Standards Officer concluded that there was sufficient evidence for the investigation to be extended pursuant to s 59(1) of the Local Government Act 2000 to consider Cllr Wright's attendance at the 16 February 2006 meeting.

2 The Investigation

- 2.1 In conducting this investigation, information has been obtained:-

- 2.1.1 By way of documentation from Stephen Whetnall, the Monitoring Officer of the Winchester City Council. Attached at Appendix I is a list of the relevant documents reviewed together with copies.
- 2.1.2 By way of correspondence from Cllr Wright and Mr Corney as listed at Appendix II together with copies.
- 2.1.3 By way of interview with Cllr Wright and Mr Corney. Copies of their respective statements are found at Appendix III.
- 2.1.4 Full co-operation has been given by all parties throughout the course of this investigation.

3 Code of Conduct

- 3.1 Winchester City Council adopted the Model Code of Conduct at a meeting on 27 February 2002 with effect from 5 May 2002.
- 3.2 The relevant provisions are set out below.
 - 8(1) A member must regard himself as having a personal interest in any matter if the matter relates to an interest in respect of which notification must be given under paragraphs 14 and 15 below, or of a decision on it might reasonably be regarded as affecting to a greater extent than other council tax payers, ratepayers or inhabitants of the authority's area, the well-being or financial position of himself, a relative or friend.
 - 9(1) A member with a personal interest in a matter who attends a meeting of the authority at which the matter is considered must disclose to that meeting the existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent.
 - 10(1) Subject to sub-paragraph (2) below, a member with a personal interest in a matter also has a prejudicial interest in that matter if the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the member's judgement of the public interest.

12(1) Subject to sub-paragraph (2) below, a member with a prejudicial interest in any matter must

(a) Withdraw from the room or chamber where a meeting is being held whenever it becomes apparent that the matter is being considered at that meeting, unless he has a dispensation from the authority's standard's committee;

(b) Not exercise executive functions in relation to that matter;

(c) Not seek to improperly influence a decision about that matter.

13 For the purposes of this Part, "meeting" means any meeting of –

(a) the authority; or

(b) the executive of the authority; or

(c) any of the authority's or its executive's committees, sub-committees, joint committees, joint sub-committees, or area committees.

4 Findings of Fact

4.1 Evidence was obtained from Cllr Wright and the complainant, Mr Corney.

4.2 Copies of the relevant documentation were obtained from Stephen Whetnall, the Monitoring Officer of Winchester City Council.

4.3 Cllr Wright is a Member of the Winchester City Council. He has been a Member for three years and does not hold any special position or portfolio on the Council.

4.4 Mr Corney and his wife are the owners of the Waller's Ash Gun Club ("Waller's Ash"). At present, the club operates on a temporary licence which must be renewed every three years and is licensed to shoot for twenty-nine days in every year. Mr Corney has advised that he has applied for a permanent licence and requested an extra fifty-two days shooting each year to ensure that the club continues to be

profitable. To reduce the noise levels, Mr Corney and his wife decided that they would construct earth bunds at the shooting ground which led to the planning application that was first considered by the Council PDC Committee on 29 July 2004.

- 4.5 In support of his planning application, Mr Corney commissioned a noise report which concluded that the sound of gunfire from the shooting ground is not always audible at South Wonston (the local village). It further concludes that the level of gunfire noise measured at South Wonston is typically about 50dB(A). 55dB(A) is the level at which the Building Research Establishment and the Chartered Institute of Environmental Health Officers state is the level below which annoyance is unlikely. The noise report also found that the noise level at South Wonston, due to non-shooting activities, can exceed that due to the gun club activities by 25dB(A). The report recommends that by re-organising the layout of the Gun Club, and erecting earth bunds, the levels of gunfire noise at South Wonston could be substantially reduced.
- 4.6 Cllr Wright lives at 26 Goldfinch Way, South Wonston, Winchester. His house is situated approximately 1.5 km to the west of Waller's Ash. There are approximately 800 houses in South Wonston. Of these 800, Cllr Wright's house is one of the 100 houses on the same side of the village which may be affected by noise from the shooting club.
- 4.7 Cllr Wright has confirmed that he is a member of the Clay Pigeon Shooting Association ("CPSA") and is a registered Safety Officer for that organisation. Cllr Wright has attended a Safety Officer Course at the CPSA and is fully aware of the rules and procedures with which a clay pigeon shooting club must comply.
- 4.8 Cllr Wright has advised that he was a co-owner of a clay pigeon shooting club, the Rack & Manger Gun Club ("Rack & Manger") in Chilbolton for twelve years. This was a "not for profit" club. Cllr Wright would pay to shoot at the club but might be reimbursed for his shooting fees at the end of the financial year if there were sufficient funds available. The club is situated eight miles away from the Waller's Ash and in Cllr Wright's view, is not in competition with Waller's Ash since they shoot on different days. There are 40 to 50 members of the Rack & Manger and there is no waiting list for members seeking to join the club. Cllr Wright resigned from the Rack & Manger in August 2004 and has confirmed that since his resignation, he has only returned to the Rack and Manger twice to shoot.

- 4.9 Mr Corney has advised that there are several other gun clubs in the area, including the Rack and Manger at Chilbolton. Popham Gun Club is situated five miles from Waller's Ash and the Winchester Gun Club is about eight miles away. Mr Corney has confirmed that the other clubs in the area, including the Rack & Manger, shoot on alternate Sundays to Waller's Ash. Mr Corney has advised that Waller's Ash usually operates at capacity every Sunday. When asked whether he considered the Rack & Manger a competitor, Mr Corney explained that at present, his gun club is very popular so whilst the Rack & Manger and other gun clubs could potentially be competitors, he does not currently perceive the Rack & Manger or the other clubs to be competitors. He did however add that should the Waller's Ash Gun Club cease operating, he was sure that the majority of his members would join the Rack & Manger.
- 4.10 Prior to the Council PDC Committee meeting on 29 July 2004, Cllr Wright submitted a letter of objection dated 29 June 2004. The letter also stated that he wished to address the meeting in respect of the application. Cllr Wright's grounds of objection as set out in the letter are:-
- The culmination of noise. Cllr Wright advised that the area already experienced noise from low flying military aircraft and army manoeuvres including gunfire. His letter of objection states that planning had recently been granted for motocross and the granting of this application would "be one too many with regards to noise".
 - An alleged failure to comply with Clay Pigeon Shooting Association ("CPSA") guidelines. Cllr Wright submitted that there was a drove passing within 50 metres of the Waller's Ash shooting ground and CPSA guidelines state that a shooting ground should be 275 metres away from the nearest public access. In addition, Cllr Wright advised that an increase in shooting days would lead to an increase in shot falls and given that there is a pig farm adjacent to the shooting ground, this could lead to lead contamination.
- 4.11 During the course of the interview, Cllr Wright has advised that having written his letter and subsequently given more thought to the planning application, he became concerned about the construction of the earth bunds and the high volume of lorries that would be needed to necessitate their construction. Prior to the 29 July 2004

meeting, Cllr Wright calculated that approximately 140,490 cubic metres of inert material would be required to construct the bunds which would necessitate around 9,366, 32 ton lorries accessing the site to deliver the material. Access to the site would be from Alresford Drove, a small track used by pedestrians, cyclists and horse riders that also links two areas of interest, Barley Mount and Micheldever Woods. Cllr Wright said that he had intended to raise these important issues at the meeting on 29 July 2004.

- 4.12 On receiving a copy of Cllr Wright's letter of objection from the Director of Development Services, Mr Corney spoke to his Planning Consultant who in turn contacted the Principal Committee Administrator, David Shaw on 28 July 2004. Mr Corney's Planning Consultant explained that Mr Corney objected to Cllr Wright addressing the meeting in respect of the planning application on the grounds that Cllr Wright was the co-owner of a gun club in the area, the Rack & Manger.
- 4.13 Stephen Whetnall, the Monitoring Officer for Winchester City Council, contacted Cllr Wright on 28 July 2004 and arranged a meeting for 1:15 pm the following day to discuss the position. At that meeting, a discussion ensued concerning Cllr Wright's prospective personal and or prejudicial interests in the planning application given that he was a co-owner of a local gun club and taking into account the proximity of Cllr Wright's house in South Wonston to the Waller's Ash. Stephen Whetnall advised caution in respect of Cllr Wright's co-ownership of the Rack & Manger and explained that Cllr Wright should declare a personal interest and clearly explain at the meeting why he did not think it was prejudicial. Stephen Whetnall subsequently advised Cllr Wright that he should also declare a personal interest in respect of his home and if he was of the opinion that the personal interest was not prejudicial, Cllr Wright should explain very clearly the reasons why he had come to that conclusion. Stephen Whetnall indicated that he did not know the sites in question and outlined the tests that had to be applied in respect of a prejudicial interest. At the meeting, Cllr Wright concluded that the location of his home might constitute a prejudicial interest.
- 4.14 The Council PDC Committee met on 29 July 2004 and considered Mr Corney's planning application, resolving to grant planning permission subject to the Strategic Rail Authority having no objections to the proposal. Cllr Wright has advised that he was however unable to attend this meeting as he was in a separate meeting with Stephen Whetnall which overlapped with the start of the PDC meeting and at that

stage he considered that the location of his home might constitute a prejudicial interest.

- 4.15 Cllr Wright has advised that as he was unable to raise his concerns about the earth bund construction at the Council PDC Committee meeting, he requested that Stephen Whetnall arrange a special meeting with the Council's Planning Department. This took place on 30 July 2004. Stephen Whetnall had arranged for the Director of Development Services to be personally present at that meeting – which accorded with the Council's practices should a Member have a potential prejudicial interest in a matter. During that meeting, Cllr Wright advised Planning Officers at that meeting of his concerns and the Committee subsequently decided to withdraw the decision to grant planning permission and defer Mr Corney's planning application pending further enquiry.
- 4.16 As stated at paragraph 4.8, Cllr Wright resigned from the Rack & Manger in August 2004. In his interview he advised that he had told the club that he wanted to resign before Mr Corney's planning application was made in May 2004 but that he was prepared to continue with his role at the club until someone was found to replace him. Since August 2004 he has had no association with the club. He explained that he resigned because as a councillor, his time was taken up with other interests and he did not have enough time to continue running the club.
- 4.17 Following further consultation, Mr Corney's planning application was considered again by the Council PDC Committee on 16 February 2006. Prior to that meeting, Cllr Wright again expressed his intention to address the Committee on the application. Following this notification, Mr Corney made his complaint to the Standards Board for England. Mr Corney contended that Cllr Wright should be prevented from addressing the Committee on the application given that he was a co-owner of the Rack & Manger Gun Club and therefore had a personal and prejudicial interest.
- 4.18 The minutes of the meeting of the Council PDC Committee on 16 February 2006 confirm that Cllr Wright attended the meeting and that before addressing the Committee, he declared a personal interest in relation to Mr Corney's application on the grounds that he was a CPSA Registered Safety Officer and also a resident of South Wonston living approximately 1.5 km from the Waller's Ash Gun Club. Cllr

Wright did not advise the Committee about his previous co-ownership of the Rack & Manger (from which he had resigned in August 2004).

4.19 Cllr Wright advised the Committee of his objections to the application, the principal reason being the significant number of heavy goods vehicles travelling along the Alresford Drove. Mr Corney's Planning Consultant then addressed the Committee and advised that he was surprised that Cllr Wright had spoken on the application given that he had a managing interest in a competing gun club and a property nearby.

4.20 Bill Lynds, Principal Legal Officer at the meeting, then advised the Members that given the statement made by Mr Corney's Planning Consultant, the Members should disregard the representations made by Cllr Wright. Mr Corney's application was however deferred to further investigate why the objection by the County Council's Rights of Way Officer had been withdrawn.

4.21 During his interview, when asked if he had considered whether his interest in the planning application could be prejudicial, Cllr Wright stated:-

"I did not consider that my interest was prejudicial. I declared an interest so that there would be no ambiguity for the Planning Committee and also so that they would know that I was speaking with some authority as a CPSA Safety Officer.

I did not mention that my membership of the other gun club had ceased. I thought it inconceivable that those present would think that my membership of a gun club was prejudicial since I had ceased being a member eighteen months ago.

In terms of the location of my property, I had reconsidered the position but felt that I did not have a prejudicial interest due to the distance between my home and the application site. Were the application to go through, the plans would actually benefit me as a local resident as the bunds would reduce the existing noise created by the club."

5 Reasoning as to whether there has been a failure to comply with the Code of Conduct

Whilst Cllr Wright declared a personal interest at the meeting of the Council PDC meeting on 16 February 2006 in relation to his position as a CPSA Officer and the location of his property, no reference was made to his previous co-ownership of the Rack & Manger. The issues to be determined by this report are whether or not:-

- (a) The personal interest declared by Cllr Wright in relation to the location of his house was prejudicial;
- (b) The personal interest declared by Cllr Wright in respect of his position as a CPSA Officer was prejudicial; and
- (c) Whether or not his previous membership of the Rack & Manger was also a personal and or prejudicial interest that should have been declared.

5.1 Proximity of Cllr Wright's House to Waller's Ash Gun Club

- 5.1.1 Cllr Wright declared a personal interest in Mr Corney's planning application at the meeting on 16 February 2006, arising out of the proximity of Waller's Ash to his home in South Wonston.
- 5.1.2 Paragraph 8.1 of the Code states that a member must regard himself as having a personal interest in any matter if a decision on it might reasonably be regarded as affecting to a greater extent than other council tax payers, rate payers or inhabitants in the authority's area, the wellbeing or financial position of himself, a relative or friend.
- 5.1.3 Cllr Wright's home is situated approximately 1.5 km to the west of the Waller's Ash. The village of South Wonston comprises around 800 houses, 100 of which are situated on the same side of the village as Cllr Wright and therefore could be said to be affected by gunfire noise from the shooting ground and also from the increased traffic in the area due to the proposed construction on the site.
- 5.1.4 Cllr Wright belongs to a small percentage (8%) of South Wonston's inhabitants who could be affected in terms of noise by an increase in the shooting days at Waller's Ash and additional traffic on the local roads due to the proposed bund construction.
- 5.1.5 In relation to the proximity of Cllr Wright's home in South Wonston, a decision on Mr Corney's application might reasonably be regarded as affecting Cllr Wright's wellbeing to a greater extent than other council

tax payers, rate payers, or inhabitants in the authority's area and Cllr Wright was therefore right to declare such a personal interest. The issue to be determined however is whether or not such an interest was also prejudicial and whether or not this should have been declared.

5.1.6 Paragraph 10(1) states that a member with a personal interest in a matter also has a prejudicial interest in that matter if the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the members' judgement of the public interest.

5.1.7 In determining whether this interest is prejudicial, we have considered:-

- (a) The proximity of Cllr Wright's home to the Waller's Ash Gun Club;
- (b) The increase in noise levels generated by the Waller's Ash Gun Club as referred to in the Noise Report commissioned by Mr Corney;
- (c) The proposed access to the site for the construction vehicles.

5.1.8 Attached at Appendix One is a copy of a map showing the location of the Waller's Ash and its proximity to the village of South Wonston. As stated at paragraph 5.1.3 above, Cllr Wright's house is on the Eastern boundary of the village and is 1.5 km from Waller's Ash.

5.1.9 In terms of noise, it is generally accepted that if Mr Corney's application were to be approved, this would lead to an inevitable increase in the frequency of noise generated by Waller's Ash because of the increase in shooting days from 29 to 78. The noise report concludes that the current sound of gunfire at South Wonston when Waller's Ash are shooting is typically about 50dB(A). The report also states that gunfire noise is not always audible and this is corroborated by Cllr Wright who has stated that gunfire noise can only be heard at his home on certain occasions when the wind is blowing in the right direction.

- 5.1.10 The Noise Report commissioned by Mr Corney states that the level of noise below which annoyance is unlikely is 55dB(A). The noise generated by shooting activities at the Waller's Ash is below this level and therefore unlikely to cause annoyance.
- 5.1.11 The Noise Report also states that the erection of earth bunds at Waller's Ash would provide at least 5dB of noise reduction at South Wonston. This has also been corroborated by Cllr Wright who has openly asserted that the approval of Mr Corney's application and construction of the earth bunds could actually benefit him as a local home owner because of the reduction in the level of noise that can be heard from Waller's Ash.
- 5.1.12 Given that the level of gunfire noise measured at South Wonston is typically about 50dB(A), this is already 5dB(A) below the level at which nuisance may be caused. The proposed construction of the bunds would reduce the noise level by a further 5dB(A) which in exponential terms might be regarded as a significant reduction. However, in view of the fact that the existing noise levels are already below the level at which nuisance might be likely, it is our view that this reduction is not so significant as to benefit the local residents or Cllr Wright.
- 5.1.13 This potential prejudicial interest must also be considered in the wider context. Cllr Wright has stated that he is not affected by the noise from Waller's Ash which can only be heard on certain occasions and when the wind is blowing in a certain direction. Cllr Wright has advised that he and other home owners in the area regularly experience noise from a variety of different sources such as regular helicopter use and other noise from the local military base. In addition, Cllr Wright has explained that there has been a recent planning grant for motocross in the area. The Noise Report corroborates these factors and concludes that the noise level in South Wonston caused by the shooting activities is exceeded by noise generated by other non-shooting activities.

5.1.14 In light of these facts, we are of the view that although the frequency of shooting will increase, the benefit that Cllr Wright may obtain in terms of a reduction in shooting noise is not such that it could reasonably be regarded as so significant that it would be likely to prejudice Cllr Wright's judgment of the public interest given that the noise levels currently generated by the shooting ground are already significantly below the level at which nuisance may be caused and taking into account the other noise in the area.

5.1.15 The proposed access route to the Waller's Ash Gun Club is from the A33 and the Alresford Drove. Both of these roads are situated some distance to the east of South Wonston as can be seen by the map attached at Appendix I. South Wonston is situated to the west of the application site and construction vehicles would access Waller's Ash from the east and the construction traffic would not therefore pass by or through the village. As stated previously, the Alresford Drove is used by walkers, cyclists and horse-riders and therefore Mr Corney's application poses a potential threat to their enjoyment of the track. Cllr Wright has advised that he does not use the track for his own enjoyment, therefore could not be said to be affected by Mr Corney's application in this respect. In our view, a member of the public with knowledge of the relevant facts would not reasonably regard this aspect of the application as so significant that it would be likely to prejudice Cllr Wright's judgment of the public interest.

5.1.16 In the circumstances we conclude that the personal interests declared by Cllr Wright were correctly declared as such, and that they were not prejudicial.

5.2 Position as CPSA Registered Safety Officer

5.2.1 Cllr Wright declared a personal interest in Mr Corney's planning application at the meeting on 16 February 2006, in respect of his membership of the CPSA.

5.2.2 Cllr Wright has confirmed that he is a member of the Clay Pigeon Shooting Association ("CPSA") and is a registered Safety Officer for that organisation. Cllr Wright has attended a Safety Officer Course at

the CPSA and is fully aware of the rules and procedures with which a clay pigeon shooting club must comply.

5.2.3 In terms of his association with the CPSA, we are of the view that this membership would not affect Cllr Wright's wellbeing but merely indicates his knowledge and experience in this field and does not constitute a personal interest. A prejudicial interest can only occur where there is a personal interest, and in the circumstances the question of whether or not his association with the CPSA was a prejudicial interest does not arise.

5.3 Membership of Rack & Manger Gun Club

5.3.1 Cllr Wright did not declare a personal or prejudicial interest in respect of his past ownership of the Rack & Manger at the meeting on 16 February 2006. A prejudicial interest can only arise where there is a personal interest and consequently the first issue to be determined is whether or not Cllr Wright's previous co-ownership of the Rack & Manger constitutes a personal interest in the matter.

5.3.2 As previously stated at Paragraph 5.1.2, Paragraph 8.1 of the Code states that a member must regard himself as having a personal interest in any matter if a decision upon it might reasonably be regarded as affecting to a greater extent than other council tax payers, rate payers, or inhabitants in the authority's area, the wellbeing or financial position of himself, a relative or friend.

5.3.3 Cllr Wright resigned from the Rack & Manger and ceased his co-ownership in August 2004. Cllr Wright has advised that he informed the gun club of his resignation before Mr Corney's planning application was filed in May 2004 but he had told his co-owners that he would continue in his role as co-owner until a replacement could be found. He subsequently resigned from the club in August 2004. Cllr Wright has confirmed that the reason why he resigned was as a result of insufficient time to assist the club due to his other interests and commitment as a councillor. He has confirmed that he has only shot at the Rack & Manger Gun Club twice since resigning.

- 5.3.4 Cllr Wright has advised that he along with four others, previously co-owned the Rack & Manger Gun Club. Cllr Wright has explained that it is a not-for-profit clay pigeon shooting club with around forty to fifty members and no waiting list. He has confirmed that he and the other co-owners would pay the club to shoot, just as the other members who shot there would; then, if at the end of the year, the club's finances were sound, the co-owners would reimburse themselves for the monies they had paid out to shoot.
- 5.3.5 Cllr Wright has confirmed that the Rack & Manger is situated in Chilbolton, some eight miles away from Waller's Ash. He has also advised that the Rack & Manger meets on a fortnightly basis and shoots on alternate Sundays to Waller's Ash. Cllr Wright has confirmed that in his view, the two clubs have never been in competition with each other since they shoot on different days. He has also advised that some of the members of the Rack & Manger also shoot at the Waller's Ash.
- 5.3.6 It is our view that Cllr Wright did not have a personal interest at the meeting on 16 February 2006 by virtue of the fact that he had resigned from the Rack & Manger some eighteen months earlier. He no longer maintained any involvement with the club in respect of its management nor as a regular shooting member. As such, any decision on Mr Corney's planning application could not reasonably be regarded as affecting Cllr Wright to a greater extent than other council tax payers, rate payers or inhabitants of the Council's area.
- 5.3.7 In the circumstances, as Cllr Wright did not have a personal interest in the application arising out of his previous co-ownership of the Rack & Manger, the question as to whether he had a prejudicial interest does not arise.

6 Conclusion and Recommendation

We therefore conclude that Cllr Wright whilst having a personal interest in Mr Corney's planning application by virtue of the noise impact on his home which he declared at the meeting of the Council PDC Committee on 16 February 2006, did not have a prejudicial interest and was not therefore required to withdraw from the meeting.

In addition, Cllr Wright could not have had a personal and or prejudicial interest in Mr Corney's application at the meeting of the Council PDC Committee on 29 July 2004 since it has been established that Cllr Wright was not present at this meeting. Mr Corney has accepted that Cllr Wright did not in fact attend that meeting and in light of that fact, he has withdrawn that allegation.

In the circumstances there has been no failure by Cllr Wright to comply with the relevant provisions of the Winchester City Council Code of Conduct.

Bevan Brittan LLP

5 October 2006