



Planning for schools: Academy and free school
planning appeals

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Introduction



- Rowan Clapp – Local Authorities as Education Authorities - the Legal Framework
- Lisa Busch QC – Planning for Schools – conducting appeals
- Ryan Kohli – the Public Sector Equality Duty and planning decisions involving provision of schools

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Planning for Schools

Local authorities and their duties

Rowan Clapp

s.1 of the Academies Act 2010



1 Academy arrangements

- (1) The Secretary of State may enter into Academy arrangements with **any person** (“the other party”).
- (2) “Academy arrangements” are arrangements that take the form of—
 - (a) an Academy agreement, or
 - (b) arrangements for Academy financial assistance.
- (3) **An Academy agreement is an agreement between the Secretary of State and the other party under which—**
 - (a) the other party gives the undertakings in subsection (5), and
 - (b) the Secretary of State agrees to make payments to the other party in consideration of those undertakings.
- (4) Academy financial assistance is financial assistance given by the Secretary of State under section 14 of EA 2002 on terms that require the other party to give the undertakings in subsection (5).
- (5) The undertakings are—
 - (a) **to establish and maintain an educational institution in England which meets the requirements of any of the following—**
 - (i) section 1A (Academy schools);
 - (ii) section 1B (16 to 19 Academies);
 - (iii) section 1C (alternative provision Academies);
 - (b) to carry on, or provide for the carrying on, of the institution

Independence from local authorities



- "not a school maintained by a local authority" per s.463 of the Education Act 1996
- Independent from the local authority **but not** from central government, who will directly fund the school.
- So, the applicant for planning permission will be the Department for Education (/construction company on their instruction).

Independence from local authorities (2)



- Reflected in a recent (2019) Government guidance document called *The Free School Presumption*, which at para 8 notes:

“Free school is the department’s term for any new provision academy. ‘Academy’ is the legal term for state funded schools that are **independent of local authority control and receive their funding directly from their government**”

Planning for schools



- BUT note para 82 of *The Free School Presumption* also stresses
“Local Authorities **must continue to plan for and secure sufficient school places for their area** in line with their duties under section 14 of the Education Act 1996”

S.13(1) Education Act 1996



“A local authority shall (so far as their powers enable them to do so) contribute towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education and, in the case of a local authority in England, further education, are available to meet the needs of the population of their area.”

s.14 Education Act 1996



(1) A local authority shall secure that **sufficient** schools for providing—

(a) primary education, and

(b) education that is secondary education by virtue of section 2(2)(a),

are available for their area.

(2) The schools available for an area **shall not be regarded as sufficient** for the purposes of subsection (1) unless they are **sufficient in number, character and equipment to provide for all pupils** the opportunity of appropriate education”

s.6A(1) Education and Inspections Act 2006



“If a local authority in England think a new school needs to be established in their area, **they must seek proposals** for the establishment of an Academy.”

Reflected in Plan Making - NPPG



“Plans should seek to meet the development needs of their area, including community facilities such as schools. They should, at the most appropriate level, allocate sufficient suitable land for schools to meet the need anticipated over the plan period, taking into account needs that may cross local authority boundaries. Plan-makers will need to work with local authorities with education responsibilities and developers to coordinate the phasing and delivery of housing growth with the delivery of new school places to ensure that sufficient school capacity is available at the right time. Mainstream schools must be of a viable size and format and planned for on the basis of standard class sizes [...]”

Paragraph: 008 Reference ID:53-008-20190722

Revision date: 22 07 2019

Reflected in Plan making and decision taking – NPPF para 94



Para 94 - It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a) give **great weight** to the need to create, expand or alter schools **through the preparation of plans and decisions** on applications; and
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Considerations in planning applications concerning education



- Sufficiency
- Not just numerical – ‘number, character and equipment to afford for all pupils opportunities for education’ (s.14 Education Act 2010).
- Local Plan and capacity/type of schools.
- Arguments about ‘need.’

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PLANNING FOR SCHOOLS

Lisa Busch QC

THEMES



- Procedure – Inquiry, Hearing or Written Reps?
- Policy –
 - schools policy (para 94 of the NPPF and 2011 WMS);
 - highways (paras 108 and 109 of the NPPF);
 - green belt (Chapter 13 of the NPPF).
- Evidence
- The Public Sector Equality Duty in school planning appeals.

Procedure – Planning Appeals Procedural Guidance s. 2.7



- PINS decides on the appropriate procedure, taking into account the criteria within Annexe K to the Guidance, as well as the views of the Appellant and LPA.
- See also para 2.7.4:

“If we decide at the initial stage that the appeal should proceed as a hearing or as an inquiry, the appointed Inspector will also subsequently consider, whether a ‘combined procedure’ would be appropriate, such as a hearing with some elements dealt with written representations or an inquiry with hearing and/or written representation elements, on the basis of the criteria within Annexe K (see paragraph 1.5.2). If so, the parties may be invited to comment on any such proposal prior to the hearing or inquiry ...”

Annexe K Criteria – for an Inquiry



- **Inquiry** - an inquiry would be appropriate if:
 - there is a clearly explained need for the evidence to be tested through formal questioning by an advocate (this does not preclude an appellant representing themselves as an advocate); or
 - the issues are complex (for example, where large amounts of highly technical data are likely to be provided in evidence); or
 - the appeal has generated substantial local interest to warrant an inquiry as opposed to dealing with the case by a hearing

In the context of school planning appeals ...



- The Inquiry procedure is often appropriate and indeed necessary:
 - Multiple issues - e.g. highways, traffics; design considerations; impact on local amenity.
- Appeals are often highly controversial, generating significant local impact (especially where highways considerations are in issue).

For example ...



- **TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78
APPEAL MADE BY KIER LAND AT SHEEN WAY PLAYING
FIELD, SHEEN WAY, WALLINGTON, SM6 8NR APPLICATION
REF: DM2019/00959**
- DL 10th May 2021
- Recovered appeal against a failure by the London Borough of Sutton (the Council) to determine an application for planning permission for the erection of part one, part two storey building (4,943m²) for special needs school (Use Class D1) for 246 students with a range of learning difficulties, together with ancillary multi-use games area (MUGA), landscaping and parking, reference DM2019/00959 dated 8 May 2019.

The issues:-



(1) Highways – construction traffic:

- Whether the Appellant's Construction Logistics Plan would manage construction traffic effectively;
- Whether the CLP would meet the requirements of the relevant policies of the Sutton Local Plan;
- Accuracy and adequacy of the swept path analyses in the CLP;
- Residual parking during the construction period;
- Highway safety and impact on traffic flow.

The issues:-



(2) Highways – operational traffic:

- Whether the site could safely accommodate staff car-parking;
- Did it provide a safe and appropriate pick-up/drop-off facility for students;
- Deliveries;
- Again, highway safety and compliance with the SLP and paragraphs 108 and 109 of the NPPF.

The issues:-



(3) Other issues:

- The need for the school (in this case, a replacement school, so not a weighty consideration);
- Flood risk;
- Air quality;
- Loss of informal open space.

When is an Inquiry not appropriate?



- Issues limited and non-technical;
- Limited local interest.
- E.g. Appeal under s. 78 of the 1990 Act against refusal by Buckinghamshire Council (against Officer recommendation) of DfE application for planning permission for a new multi-purpose space at former site of Focus School – in the Metropolitan Green Belt.

Sole issue:-



- Impact on the Metropolitan Green Belt:

- Reason for Refusal:

“The application site is located within the Metropolitan Green Belt wherein there is a general presumption against inappropriate development except in very special circumstances. The proposed development constitutes inappropriate development within the Green Belt, which by definition is harmful. As well as causing harm to the Green Belt by virtue of its inappropriateness, other harm is caused to the Green Belt by way of a reduction in its openness. The NPPF sets out that substantial weight should be given to any harm to the Green Belt. It has not been adequately demonstrated or justified that there is a need for the proposed development, nor that it is fit for purpose in terms of its size and function in relation to the size of the educational facility it would serve. No very special circumstances have been advanced that clearly outweigh the harm that would be caused to the Green Belt by reason of inappropriateness and a reduction in openness. As such the proposal is contrary to policy GB1 of the South Bucks District Local Plan (adopted March 1999) and section 13 (Protecting Green Belt Land) of the NPPF.”



- LPA requested Written Reps;
- DfE requested Inquiry:
- PINs (by way of a compromise): hearing.
- 1 day (remote) hearing in May 2021.
- Decision on the appeal awaited.

Policy – paragraph 94 of the NPPF



- It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:
 - give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications;

and

- work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Policy – 2011 WMS: Policy Statement on Planning for Schools Development



- 15th May 2011
- SoS for Communities and Local Government and SoS for Education

“The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education and raising educational standards. State-funded schools - which include Academies and free schools, as well as local authority maintained schools (community, foundation and voluntary aided and controlled schools) - educate the vast majority of children in England. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities ...”.



“... It is the Government’s view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. We expect all parties to work together proactively from an early stage to help plan for state-school development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, ‘yes’”.



“The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply with immediate effect:

- **There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.**
- **Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions.** The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision



And note:

“A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence ...”.

Weighed in the balance with Green Belt policy:-



E.g.

Chapter 13 of the NPPF “Protecting Green Belt Land” – see in particular paras 143 and 144:

“143 Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

“144 When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.



- C.f. the Focus School Appeal:-
- VSCs:
- Need for the development to accommodate exams, assemblies and indoor sports;
- Clearly an improvement to the existing school in line with para 94 of the NPPF and 2011 WMS;
- S. 149 of the Equality Act 2010 (PSED)?

Will these be sufficient to outweigh admitted harm to the Green Belt???

Highways policy:-



- Paragraphs 108 and 109 of the NPPF:

“108 In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

 - appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - safe and suitable access to the site can be achieved for all users; and
 - any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

“109 Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.



- Again, the question arises of how to weigh in the balance where highways concerns are in issues:
- LPAs – will stress safety, congestion and impact on residential amenity.
- DfE – must present cogent evidence to rebut any such case.
- Pre-Inquiry (and during) LPA and DfE experts should work together to attempt to resolve issues so far as possible.

Design policies:-



- NPPF Chapter 12: Achieving well-designed places.
- See in particular paras 130 and 131:

“130 Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development ...” .



“130 In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”.

- Design-related Development Plan policies will also be relevant.
- Special considerations arise in school design, including both mainstream and special educational needs schools – functional requirements must be met.

See, for example:-



- Land at Former All-Weather Pitch and Astro-Turf Tennis Courts, Rosehill Recreation Ground, Rosehill, Sutton SM1 3HH APP/P5870/W/19/3241269 (DL dated 25/03/2021)
- Recovered appeal against the decision of the Council of the London Borough of Sutton (the Council) to refuse your client's application for planning permission for the erection of a four-storey building creating a new eight form entry secondary school, including a sixth form, a Special Educational Needs (SEN) school for secondary age students and a detached part-one, part-two storey sports hall (Use Class D1), modification of existing access from Rose Hill, provision of areas of hard playing space, car parking, cycle parking and hard and soft landscaping works and other associated works, reference DM2019/00985, dated 5 June 2019.

Appeal allowed



- The Secretary of State for Housing, Communities and Local Government agreed with the Inspector that the development proposal was a ‘taller building’ in terms of Local Plan policy 28Q of the Sutton Local Plan, and as it was located outside an Area of Tall Building Potential, it was in conflict with that policy.
- He also took the view that Local Plan policy 28Q expressed the requirement that taller buildings will be expected to be of exemplar design and make a positive contribution to the quality of the local and wider townscape and skyline, whether they are located in an Area of Taller Building Potential or not.



- Therefore, the proposed development was expected to be of exemplar design:

“He further considers that the proposal’s design does not meet this standard. He notes that although the Inspector is satisfied that the comments made by the Design Review Panel (DRP) were taken into account and some influenced design changes (IR202), a range of significant of unresolved issues remained at the conclusion of the DRP process (IR97). He agrees with the Inspector’s assessment that the building would appear institutional with limited modulation of its large roughly rectangular shape (IR159), and that the sheer size of the proposed school building, along with its mass and bulk, located adjacent to the MOL would diminish the openness of that space (IR161)”.



- In the light of his conclusions on the design of the proposal, the Secretary of State took the view that it would have a harmful impact on the character and appearance of the area, and on the visual setting of the adjacent Metropolitan Open Land, which also put it in conflict with Local Plan Policy 28N. He considered that the design deficiencies and the resulting harm weighs against the proposal.
- The Secretary of State was also critical of the internal design of the proposal in various respects.



- However:

“The Secretary of State affords great weight in favour of the proposal to the additional secondary school places and significant weight to the additional SEN places ...”.



“37 Weighing against the proposal the Secretary of State affords significant weight to external design quality and the deficiencies in the external and internal arrangements. He also considers there are consequent impacts on the character and appearance of the area and visual setting of the MOL. However, taking into account the educational and site specific constraints of the scheme, the Secretary of State does not consider that the harm justifies a refusal of permission in this case.

38 Overall the Secretary of State considers that the material considerations in this case indicate a decision not in line with the development plan – i.e. a grant of permission.

39 The Secretary of State therefore concludes that the appeal should be allowed and planning permission should be granted”.

Compare:-



- Appeal decision dated 14/02/19 re 1 Westmoreland Road, Bromley BR2 0TB.
- Appeal against refusal of permission for development comprising the demolition of the existing office (Class B1) and erection of a part 4/part 10 storey building (inclusive of lower and upper ground floor levels) for education use (Class D1) for up to 1260 pupils ages 11-19 years, associated cycle and car parking, refuse and recycling provision, coach drop off zone and associated soft and hard landscaping.
- Tallest school in Europe.



- Appeal dismissed.
- Main issues included:
 - The effect on the character and appearance of the area, having particular regard to the height, massing and site coverage of the proposed building and the impact on long-range views from the town centre;
 - The effect on the living conditions of neighbouring residents, with particular regard to their outlook;



- Inspector's conclusions on character and appearance:

“37 ... I find that the appeal proposal's impact on views and excessive height and mass on Sandford Road would conflict with TCAAP Policy BTC19 and with the key design principles for the site set out in Annex 5. It follows that the proposal would also conflict with TCAAP Policy BTC17, which seeks the highest standards of design in all development. The proposal would also conflict with BLP Policy 37 which requires development to respect important views and skylines and to complement the scale of adjacent buildings; with BLP Policy 47, which requires tall buildings to respect strategic views and to ensure that their massing and scale enhances the character of the surrounding area; and with BLP Policy 48, which seeks to protect views and vistas where the skyline would be affected, and whose supporting text identifies the view of Keston Ridge as one of local importance”.



- Plus unacceptable impacts on the amenity of local residents, contrary to development plan policy.

The balance?



“57. I acknowledge the great weight required by national policy to be given to the provision of new schools, and the reflection of this in LP and BLP policy. However, the NPPF states that the creation of high quality buildings and places is fundamental to what planning should achieve. Thus matters of placemaking and amenity also merit very substantial weight, both in national and local policy. The presumption in favour of the development of state-funded schools outlined by the 2011 Written Ministerial Statement is echoed by the support for such development in the two subsequent iterations of the NPPF. However, in neither case is there a presumption so compelling that it should lead to approval of development that in other circumstances would be deemed unacceptable in its impacts or to otherwise set aside the development plan”.

Evidence



- DfE: depending on the issues in the appeal, DfE will call a range of expert consultants, all of whom will be backed by their own teams – planners, architects, landscape architects, highways consultants, construction experts etc; as well as experienced solicitors and counsel.
- And: the Head Teacher of the proposed school.
- LPA? Resource issues – generally rely on a planning officer witness, internal experts (e.g. highways officers) and possibly one or two external consultants.

Advice for LPAs:-



- Involve planning officers and other internal experts in preparation at an early stage in the appeal process.
- Likewise, if practicable, solicitor and counsel.
- Identify your strong and not-so-strong points – which parts of your case should be pursued and which not.
- **IMPORTANT:** ensure that your case is consistent as between one witness and another.



- Narrow issues as much as possible – in discussion with DfE.
- Follows policy requiring cooperation in NPPF and 2011 WMS.
- Should save costs: remove need for Inquiry in favour of Hearing or Written Reps/save Inquiry time.
- Where RfRs (actual or putative) are given contrary to Officer recommendation to grant pp, consider bringing in external consultant(s) to present LPA case.
- May save expenses in the long term (avoid costs application).

PSED – s. 149 Equality Act 2010



- Can arise in appeals – faith schools and special needs schools.
- E.g: Land at Former Hackney Police Station, 2 Lower Clapton Road and 32 St John's Church Road, London E5 0PA App/05360/W/16/3164952) (DL dated 19/12/2017).
- Recovered appeal against refusal of planning permission and listed building consent for works required to convert former Police Station into a Muslim faith primary school.



“31 In accordance with section 149 of the Equality Act 2010, due regard has been given to the need to (a) eliminate discrimination, harassment, victimisation; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The Secretary of State has considered the protected characteristics of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

32 For the reasons given at IR277, the Secretary of State considers that the proposal would advance equality of opportunity between those who share a protected characteristic and those who do not share it. Like the Inspector, he accepts that the school would be able to manage the use of teaching spaces to ensure that any disabled pupils or staff members were not disadvantaged. Overall, he considers that the equalities impacts of the proposal would be positive”.



E.g:

- Focus School appeal – Sikh faith mainstream secondary school.
- Sutton appeals – special needs schools.

Over to Ryan!

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**Public sector equality duty & planning decisions in
education**

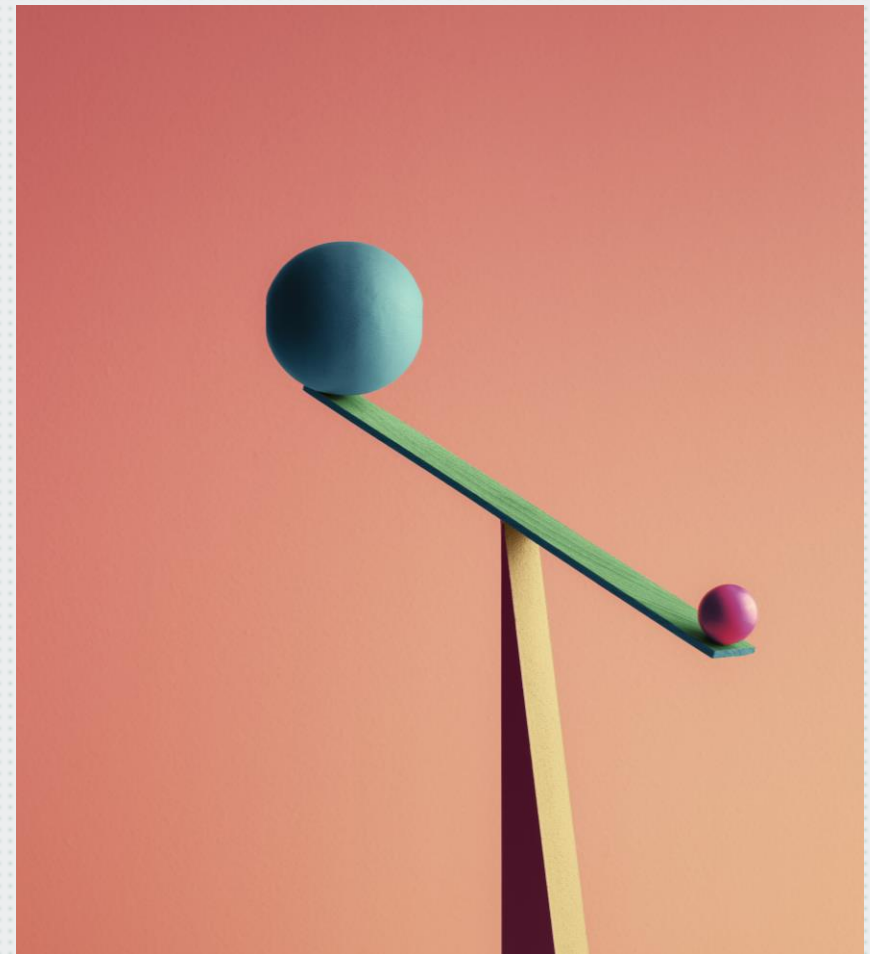
Ryan Kohli

Brief overview of the Public Sector Equality Duty



- Section 149 of the Equality Act 2010 requires a public authority, in the exercise of all its functions to have **due regard** to the need to:
 - Eliminate discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010;
 - Advance equality of opportunity between persons who share a relevant **protected characteristic** and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- Context-specific duty of **process**, not a duty to achieve a particular result or outcome

R(Baker & Ors) v SSCLG, LB of Bromley v EHRC [2008]
EWCA Civ 141 per Dyson LJ at [31]



Demonstrating compliance with the PSED



- Six principles apply to the discharge of the PSED
 - Public authority must be made **aware** of its duty to have due regard to the identified goals
 - Must be fulfilled **before and at the time** that a policy affecting people holding protected characteristics is being considered
 - Must be exercised in **substance**, with rigour and with an open mind, rather than box-ticking exercise
 - **Not delegable**
 - **Continuing**
 - Good practice for local authorities to keep an **adequate record** showing compliance

R(Brown) v Secretary of State for Work and Pensions & Ors [2008] EWHC 3158 (Admin) at [85 – 96]

Bracking & Others v Secretary of State for Work and Pensions [2013] EWCA Civ 1345 at [26]

How might PSED issues arise in planning decisions concerning educational provision?



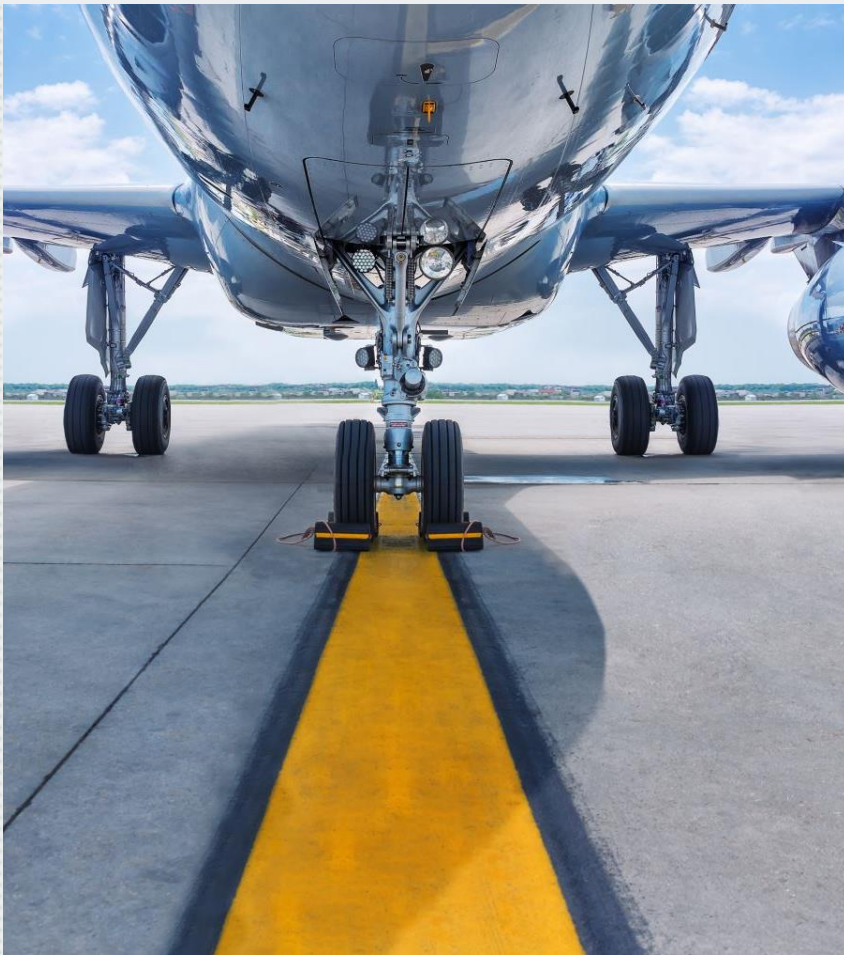
- Students holding protected characteristics could be impacted by a planning decision about the location of a school or development nearby
 - e.g. Aircraft noise from a nearby airfield might have a particular impact on children with hearing or communication impairments

Gathercole v Suffolk CC [2020] EWCA Civ 1179

- Members of the wider community holding protected characteristics could be impacted by the decision to grant permission for an educational development
 - Site used particularly by the elderly and people with disabilities to be developed into a school
- R(Coleman) v Barnet LBC* [2012] EWHC 3755 (Admin)
- Educational facilities for specifically students who hold a protected characteristic– e.g. faith schools, schools for students with SEN



Students holding protected characteristics



- *Gathercole v Suffolk CC* [2020] EWCA Civ 1179
 - Court of Appeal held that a County Council had not complied with the PSED
 - County Council failed to have regard to the impact of aircraft noise in outdoor areas on children with certain disabilities
- Later plan for mitigation measures did not reverse failure to take account of PSED [32]
- Not relevant that the failure to have regard to the PSED in respect of outdoor areas was not raised by parties during the planning process [31]
- However – held to be highly likely that the PSED would have made no difference to the planning decision, so decision not quashed under section 31(2A) Senior Courts Act 1981

Wider community holding protected characteristics



- Identified need for more school places can outweigh the impact on other groups holding protected characteristics: *R (Coleman) v Barnet LBC* [2012] EWHC 3755 (Admin)
 - Permission for development of a school on site of a former garden centre used regularly by disabled and elderly people
 - Held that the LPA's performance of the duty was sound and complete – compliance with six *Brown* principles
- Having due regard to the statutory goals is not an 'abstract exercise' but to be approached with 'realism and common sense' [96]
- Due weight should be given to countervailing factors e.g. need for school places



Educational development directly engaging a protected characteristic



- Special educational needs facilities or specialist provision – invariably linked with students holding a protected characteristic
- Faith schools e.g. permission to develop religious spaces such as chapels
- Single sex schools?
 - Specific exemption in Schedule 11 EqA 2010
 - Sex segregation is not prima facie direct discrimination as per the majority in *HM Chief Inspector v Interim Executive of Al-Hijrah School* [2018] IRLR 334
- Potential for discrimination against students who do not hold the relevant protected characteristic which is the subject of the targeted provision
- Positive action provision – section 158 EqA 2010



Planning for Schools

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