

Rose Cottage
3 St John Close
High Street
Honiton

24 February 2021

Mr Gordon Lennox

I have had a problem printing an index. I have reserved numerous pages of evidence for the hearing since the bundle would be enormous otherwise.

I have included data concerning Carl Cracknell and my letter of 3 December to you. I can provide hard copies of all texts to Mr Darsley if needed before 12 March.

I have taken advice and believe that the structure of Mr McCollum's complaint suggesting only one 'bullying event' should be considered is rendered null and void by your fusion of three complaints. Thus the so-called bullying is actually the actions taken to rectify the appalling and dangerous treatment of Carl Cracknell who as you know was not interviewed by Mr Darsley. As I say that should have been done since you have fused three complaints.

John Taylor.

Dear Stephen (from John Taylor) 4 February 2021.

A short note explaining the files sent by Jill M to you of even date.

1. You have asked for a meeting to discuss my current role in the Street Market. My role arose because of the need for a SARS-CoV-2 Risk Appraisal. The risk evaluation was needed because HMG decided to allow open-air markets to trade inclusive of stalls selling previously 'non-essential goods'. HMG created a two-week window Monday 1 June 2020 to Sunday 14 June when the Honiton street market could trade but non-essential bricks and mortar shops could not.

- a) That meant the market could open from Tuesday 02 June 2020. In fact because of a lack of physical things such as queuing posts linked by barrier tape (solved by the Mayor and me on Thursday 4 June by in part driving to a building supplies merchant in Exeter. The market actually opened on Saturday 6 June. Mr (EDDC Cllr) McCollum self-certificated stress symptoms on Wednesday 3 June at about 14.00 having been on the High Street in the morning assessing the requirements to move the Gate to Plate from July to October (member of public comment – hence hearsay).
- b) It must be emphasised that the street market charter is the property of HTC and as such has a value. It could be sold by auction. I have tried previously to have it included in the Asset register. I value the Charter at over £50000 – a rent-free half mile stretch of High Street with powers to curtail traffic, allow any (legal) trade and charge pitch fees, parking etc. Think about it.

2. Jill sends you a series of files.

- a) SARS-CoV-2 created 13 May 2020. My notes *re* a risk appraisal required prior to opening the HTC offices. I do not expect you to be *au fait* with the vocabulary but I will include this in my bundle to the Standards Committee. I added a single note to this on 02 June as a result of being asked to do a Risk Appraisal to reopen the Street Market. Viruses have a habit of mutating and oddly that is nearly always a good thing since it leads to attenuation of the virus capabilities – a population effect not unlinked to the misreported Herd Immunity concept. (S.H. 4-5)
- b) SARS-CoV-2 JT HTC created and issued 18 May 2020. I am saddened that Heloise has not provided this to you. It is a short Risk Appraisal for allowing the offices to be used and the (S.H. 6-2) numbers therein at any one time. Please note that Mr McCollum could have utilised this facility.
- c) SARS-CoV-3 JT HTC. [I apologise for the '3' in this nomenclature. At present there is no such virus – it was simply my addition of documents to my work. I assume that when you get the files then the Properties (limited metadata) will come with them thus establishing the date line.] This file is Part 1 of an email that I requested be sent to the members of Human Resources (HR) of HTC that at that time, as a result of unlawful advice given to HTC at the March meeting consisted of the entire Council; a resolution that breached Data Protection legislation and that took months to correct. [This was not the only poor advice given by Mr Randle who insinuated himself into the chaotic administration (as defined by DALC/NALC) that then existed in HTC]. The file was created 28 May and modified by me on 31 May prior to issuance by the Mayor. (S.H. 9-13)

Stephen H. (1)

- d) Draft Mr J Harding 01 June. This was Monday. I was aware that on Friday 29 May Mr McCollum had stated that he was not going to do a risk assessment since 'anything with his name ^{SH 26-27} (signature) would be ignored by the Council'. The Mayor will have those communications since they included Mr J Harding of EDDC Environmental Health (EH). I apologise for the word draft in the title. It was the product of an urgent and duty-dependent requirement of me at the time.
- e) Street M. Risk Ass. This is a MS-Word document created and issued together with the following excel spreadsheet on 4 June 2020.
- f) Street M Risk assessment (excel spreadsheet) This was issued with 'e' above on 4 June the day after Mr McCollum self-certificated for stress. Since HTC had agreed to open the market then this left me as the only person remotely experienced to apply its decision. Carl Cracknel has no experience of risk assessment etc and in particular viral transmission. Nor does Ms Heloise Marlowe.
- g) Notices for COVID. Created 5 June and printed and laminated and applied (stuck) to many lampposts, trader stalls, entry points etc to the street market on 6 June.
- h) Mr J Harding Fri 6 June 2020. Self explanatory.
- i) Letter to M. Williams. Self explanatory. Also copied to Mr Henry Gordon Lennox,

3. I conclude this preparatory documentation for our meeting. Historically I covered for holiday absences of Mr McCollum. For instance following his wedding I 'ran' the market for four weeks – two whilst he and Cathy visited Ireland and two whilst they completed the honeymoon in Colyton. Given my technical background *vis-à-vis* the ongoing viral pandemic I was appointed by HTC to evaluate HMG guidance as to Health and Safety. The above documents contribute to the decision-making etc of HTC during the unique (to date) Public Emergency. Unfortunately for me the pandemic illuminated the failure of HTC administrators to have Risk Assessments (e.g. evaluation of risk, mitigation of such and avoidance of gain to private interests such as a Freemason Lodge), Policy statements (and summonsed meetings of the Council), Finance meetings (failure to issue summons of the Council) etc. I say unfortunately for me since my duty under the Good Councillors Guide required me to highlight events to my Council (and the then HR) that has resulted in a referral to a Standards Committee Hearing that I believe has numerous problems relating to Independence (c.f. conflicts of interest) and the exposure of improper activities of an EDDC Cllr. Please note that a Standards Hearing is a quasi-judicial process and that an Appeal process, which existence the Human Rights Act requires and which view has numerous Precedents, is a requirement and therefore the appeal will be an Application for a Judicial Review. If the current 'Darsley Report' is not thrown out* then there I will request Permission for a Judicial Review. This will not include HTC as a Defendant, merely EDDC. However EDDC may ask for HTC to be included as an Interested Party but it is evident that I have gripes only with EDDC given that the major players – McCollum – Tredwin – Sheridan Shaw have left HTC.

* You will realise that if the Standards Committee throws it out then EDDC Cllr McCollum and Mr Henry Gordon Lennox are exposed to legal action from me. Hence the impossible position that EDDC and its Cllr Mr McCollum have created for themselves. I will not even accept a recommendation for training –

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Stephen H (2)

how do Parish Councillors accept training that advises them to ignore breaches of Health and Safety legislation that led to pecuniary benefit for a private members club, the Freemasons?

I accept that prior to your acceptance of appointment as Clerk, you would have been aware from '(anti) social media especially on Honiton Forum that there was and is turmoil affecting democratic representation within the Honiton electoral boundaries. Individuals, who live beyond the electoral boundaries, for examples Mssrs Jason Hannay and Nick Randle, contribute to the turmoil. Did they sign the 'Governance Petition'? I think you will have a unique C.V. as a Town (Parish) Clerk following events from now until late summer and wish you well for the unavoidable interest that will probably occur within the Commons Committee for Local Government.

Thank you for reading this. I hope this assists both of us to ready for our meeting on Monday.

John Taylor.

Stephen Hill 3

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The virus is assumed to be transmitted by large respiratory droplets but there has been no direct evidence for the hypothesis. The best route to identifying the portals is by examining the organs and cell types that are permissive to implantation of the virus and subsequent replication.

Sars2 tropism

Routes. Airways, ocular conjunctiva

Innate host responses in pathogenesis. Icu patients have much higher plasma concs of proinflammatory cytokines eg IP-10, MCP-1, TNF-alpha.

sars 2 replicates in the bronchial epithelium.

Sars 1 and 2 replicate in the alveolar epithelium

Sars 2 induces less of the proinflammatory cytokines than H5N1, H1N1 or Mers-CoV and these are more lethal but not as transmissible.

Virus shedding by sars2 before symptom presentation is unusual

Genetic host factors polymorphisms in ace2, HAT and transmembrane protease serine 2.

ACE2 and transmem... Used by both sars 1 and 2 for cell entry. The low level of ACE2 in bronchi is overcome by an associated protease cleaving loop with a SerProArgArg sequence seen in CoV2 but not in 1.

So the activation of the spike protein in SARS2 appears to be dependent on proteases supplemental to ACE2 in bronchi.

Upregulation of ACE2 by influenza or other infections prior to SARS2 infection probably enhances to progression of covid19 in patients explaining some of the sensitivity of patients with conditions that enhance risk of death.

CoV2 has been found in tears and faeces. Found in conjunctiva so eye is a probable route of infection.

Hands mainly but possible droplets.

The Virus

The genome is arranged in the order: 5'-untranslated region, Replicase complex, Structural proteins (Spike-Envelope-Membrane-Nucleocapsid), 3'-untranslated region.


Best? source of sequences – <http://www.ncbi.nlm.nih.gov/genbank/>

Bioinformatics. Sequence variations occur at numerous sites and that is why RT-PCR testing in the early days was unreliable. It needed multiple analyses of the same sample to ensure that false negatives were not issued.

Symptoms fever, coughing, shortness of breath, diarrhea, loss of smell.

Organ failure, lung heart, liver kidney.

Mortality rate unclear since numerous mild cases are unregistered but is about 3% in hospitalised cases.

Stephen Hill ⁴ 

This is a short, not comprehensive, description of technical data for SARS-CoV-2.

1. I have used this data summary to inform me as to how to interpret HMG advice on the SARS-CoV-2. It is notable that HMG is providing advice that arises from risk assessments made by its advisory committees. It appears that HTC as employer and as provider of some public areas etc has to interpret the guidance not as a risk assessment but as a means of compliance with the advice. In other words it is an identification of Hazards arising from the epidemic and managing those hazards in a reasonable manner. I emphasise that in Health and Safety, Risk is not the same as Hazard, although most people equate the two.

2. SARS-CoV-2 is a coronavirus. Coronaviruses are positive-stranded RNA viruses with 30-kb genomes packaged in helical nucleocapsids. The nucleocapsid is incorporated into a viral particle by budding from a host cell membrane. Between the nucleocapsid and the membrane is the matrix. Incorporated into the membrane are Spike proteins. These proteins recognise receptors on the host cell, bind and initiate the enveloping of the virus into the host cell's cytoplasm. The virus replicates within the cytoplasm.

3. SARS-CoV-2 gains its membrane from the host cell by budding from the intermediate compartment between the endoplasmic reticulum and the Golgi complex. Other viruses use othe membrane, frequently the cell membrane itself. The coronavirus membrane contains three or four viral proteins: The membrane protein, the Spike protein, the small envelope protein and sometimes a hemeagglutinin-esterase protein

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Stephen Hill

A short risk assessment and interpretation of UK government advice, particular to the working site of Honiton Town Council (HTC, and during the COVID-19 respiratory disease outbreak.

This is an unusual risk assessment in that the emphasis for protection at work begins before a person even leaves home.

1. The Illness in brief:

- a) COVID-19 is the name of the illness caused by coronavirus SARS-CoV-2.
- b) SARS stands for Severe Acute Respiratory Sndrome. The first variant was identified in the early 2000s and caused about 900 deaths worldwide. SARS-CoV-2 is a novel variant that is notably more virulent and transmissible.
- c) SARS-CoV-2 is a virus not a bacterium. Antibiotics will have no effect on its progression in a patient. Likewise antibacterial handwashes will have no direct effect but may remove the virus through any detergent properties in the handwash.
- d) The virus is assumed to be transmitted by respiratory droplets* but there has been no direct evidence for the hypothesis. However the droplets:
 - i. May be inhaled by a person close by an infected individual who sneezes (e.g. hay fever).
 - ii. May land on communal surfaces etc.
 - iii. May be on the infected persons hands and be spread to communal surfaces etc.
 - iv. May be spread from tissues, face masks etc that are poorly disposed of.
- e) Entry into the body is then to be identified. The best route to identifying the portals is by examining the organs and cell types that are permissive to implantation of the virus and subsequent replication. From this data the virus has been shown to enter the lungs via the nasopharyngeal tract that is above the roof of the mouth. When you breath, air flows through the nose into your throat and nasopharynx and then eventually your lungs. Thus it is obvious that the virus can enter through the nose and mouth. However most people do not realise that the tear ducts drain into the tract thus the virus can enter via the eyes. (Try putting a finger into the 'corner' of your eye and stroking gently downwards beside your nose. Repeat a few times. You will discover a feeling of a nasal drip and you will sniff slightly and then swallow.) Your eyes are warm and wet, ideal for a virus.
- f) What appears different for SARS-CoV-2 to SARS-CoV is that SARS-CoV-2 seems to be able to attach to receptors and replicate in the Tract and below that to the bronchial epithelium and thus is considerable more infectious since SARS-CoV does not do this. Both viruses attach to the alveolar epithelium. The alveolar is the proper name for the 'air

Stephen Hill B

sacs' at the end of the bronchi system and where oxygen/carbon dioxide exchange takes place with the blood. *[Imagine the alveoli are the berries of mistletoe and the bronchial system is the mistletoe branch system and the tree branch is your throat. SARS-CoV appears to only attach and replicate in the berries only and that is where, for example, pneumonia occurs]*. Coughing can clear the bronchi, thus it is suggested that is why SARS-CoV and SARS-CoV-2 are so different in their infectiousness. This however is from as yet 'un-refereed by Peer review' research publications.

g) *The virus is definitely excreted in faeces. Thus another infection route is from poor lavatory practices. The virus is destroyed by chlorinated cleaning fluids.

2. The advice (probably) given to/by Governments.

- a) The virus will be destroyed by good hygiene. This impacts on surface transmission etc.
- b) The virus is not air-borne and so 'social distancing' where people can avoid inhaling droplets is possible.
- c) People with symptoms should refrain from contact (self-isolate) with others. Close-knit groups such as families have been asked to self-isolate also.
- d) Past advice emphasises that even in near contact then it need time to raise the risk of direct droplet transmission.

3. This risk assessment is derived from Advice** contained in <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/Offices-and-contact-centres>. The Advice** has been integrated into the physical circumstances of the HTC offices in the Beehive.

4. HTC has already agreed that its staff should work from home whenever possible. However statutory requirements such as the Yearly Audit has necessitated occasional working from the HTC Offices. The Yearly audit is not simply about accounting numbers. It is about HTC compliance with, for examples:

- a) Holding regular full council meetings (minimum four per year May-April).
- b) Regular finance meetings.
- c) Reporting of finance to the public (e.g. any payment over £500 must be identified and detailed on the HTC website.
- d) Maintaining policy documents etc (updated where necessary but simply renewed by vote in full council otherwise).
- e) Updated risk assessments.

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It is the need to access records etc that leads to the need for the Deputy Clerk to go into the HTC Offices during the COVID-19 outbreak. As good practice demands a person should not work alone however that simply means that a second person must be on site although they may assist the Deputy Clerk.

5. Identification of risk.

a) The government advice (website address above; paragraph 3) should be read by anyone going into the HTC Offices. This identifies what social distancing practices should be pursued whenever possible on site. It must be remembered that the original advice was that social distancing was necessary for static close contact and that risk from close contact increased with time. Application of social distancing to the passing of people in the street seems to have been a population decision?

b) The whole system depends on individuals self-identifying their own health. If any employee thinks that they have one or more of the well-publicised symptoms of COVID-19 then they should not go into the HTC Offices. These symptoms include a high temperature (especially a skin temperature of chest and/or back that is very hot to touch together with an absence of sweat), cold/hot flushes with sweating, a dry persistent cough, extensive muscle aches, a loss of sense of smell and/or taste (try sniffing newly cut garlic, ginger, onion etc of a bag of flavoured crisps etc).

c) Assuming that the individuals have no symptoms and have washed their hands and face before leaving home then the uniqueness of the workplace comes into play.

i. HTC Offices are entered via a keypad. I suggest a disposable tissue would be sufficient to protect here.

ii. The staircase is short and another person would be obvious. Social distancing would be possible at the base and top of the stairwell.

iii. On entering the communal hallway then there are hand-washing facilities in the two toilets. If a detergent handwash is not available than HTC will have to provide one. In the first instance would the staff take in a small bottle (or see below)?

Diluted (1:4) shampoo or shower solutions or like products (these usually have ionic detergents in them) would be sufficient, rubbing it as shown in government videos BUT do not do this under running hot water. It may get too hot. If I

remember rightly the water is provided through pushbutton taps. I presume the twenty seconds in videos refers to the dwell time of the detergent while rubbing the palms and between finger webbing etc, is undertaken. Rinsing off the soap/detergent after 20 seconds should be under warm water if possible. Pieces of good quality kitchen towel should substitute for paper hand towels.

Stephen Hill
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- iv. The HTC Offices have a 'coffee facility'. This must not be used for hand washing. And again remember that the hot water is too hot. I cannot remember if there is a mixer tap as well as the hot water cistern. Washing up of cups etc should be safe as long as detergent is used.
- v. The Mayor has tried to obtain some isopropanol that is perfect for cleaning keyboards and desktops and it has antiviral activity. However it is sold out. An alternative is methylated spirit although it has an unpleasant smell etc. Both are flammable so will be provided in small bottles. The stock will not be kept in the building. Small quantities of isopropanol are routinely found in offices since it is used for example for cleaning printer ink deposits etc. It is also used in medical procedures to sterilise skin. Methylated spirit is mostly ethanol (drinking alcohol) which is also an antiviral which has a chemical added to make people vomit if drunk. That precaution is not used for isopropanol. So temporarily it will have to be methylated spirit used as below (vi).
- vi. HTC will need to cover costs of tissues brought in to use with the alcohol. Dampen the tissue; do not soak it so that it is dripping. Both isopropanol and methylated spirit evaporate rapidly. If used on say a keyboard before work then leave for five minutes to ensure any possible residue has evaporated.
- vii. One person per room at any one time unless it is unavoidable. Windows to be opened to ensure ventilation.
- viii. Each desk should have a small bin for tissues. Small plastic bin liners are available but are not yet in the offices. At the end of the day I suggest the bags are tied and put into the swing bin in the coffee facility. That liner could be replaced every week since usage is so low. I assume that the cleaners are not coming into the Beehive.

If the staff wants, I will come into the Offices to sterilise the toilets etc. This could be safely done whilst they are in the Offices since there would be no social interaction. I could also meet the Deputy Clerk at the back door to provide tissues (face and kitchen towel), hand washing solutions (probably something like diluted radox) that are still easily available.

John Taylor

I have prepared a review of technical descriptions of SARS-CoV-2 and its infection mechanisms in tissues if people want that.

Stephen Hill
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This was to be a short description of events of Thursday 28 May relating to the opening of the Street Market. However following Cllr Wyatt's odd submission with few facts I have included some comments but reserve others. I also comment on the paperwork provided by Mr McCullum (three pages). This is Part One of a risk compliance required by HMG.

1. The 'meeting'.

A meeting was originally arranged with Carl, Market Assistant and Cllr Wyatt for 11.00. I believe that Carl invited Market Traders since they may have experience of other Markets. Following the likelihood that Cllr Wyatt would not make it then the Mayor asked me to attend given that I often (until 2017) stood in for Mr McCullum's whilst he was on holiday, once for 4 weeks.

- a) I understand that Cllr Wyatt then said he was available 10.45 – 11.15, which meant that I would still be needed.
- b) From the Boston Tea Party end I approached the rendezvous at St Pauls at 10.35. Mr McCullum was there but was engrossed in consecutive phone calls. At about 11.55 I became aware of Carl, Cllr Wyatt and two market traders approaching from the West, i.e. from the direction of Lace Walk. It appears that Carl had met Cllr Wyatt in/near New Street and they turned left into the High Street walking towards Exeter and then must have crossed over. They met the traders near Lace Walk.
- c) Carl and Cllr Wyatt described that they had made measurements of pavements at various points in the street. I note that Cllr Wyatt makes no mention of this data in his opinion. In fact Cllr Wyatt makes no mention of Carl's ideas that were substantiated by hard data nor does he mention that he made measurements

2. South side (Complete Meats side)

I do not think Carl and Cllr Wyatt made measurements of the road but it must be noted that the road is asymmetrical. From the kerb by Complete Meats to the central white line is 11 paces, from the white line to the kerb at Lace Walk 7 paces. It follows that there is more room on the South side (Complete Meats side) to move stalls into the road, protected by the traffic cones and tapes of the street. This would not change the traffic flow from the usual market since traders frequently have vehicles parked behind their stalls so there would be space if the vehicles were relocated*.

- a) Carl's suggestion is that stalls would be located opposite entries used by businesses that are not trading until at least two weeks time. Thus no market stalls would be located in front of Nat West, Santander or Complete meats. Lloyds bank 'does not queue in the High Street so that roadside is available to the Market.

- b) Nat West and Santander have markings on the ground for customer 'spacing' (Lloyd's customers queue in New Street), with the consequent 2 metre markings on the ground for queues. **It is obvious that Environmental Health (EH) have accepted this as 'Covid-safe' as long as the queue is unidirectional and the pedestrian two-way traffic is confined to the remaining pavement.**
- c) Given that the Market stalls could be moved a metre into the road where the trader's cars have been often parked then that would free up a unidirectional queuing area (indicated by chalk arrows on the tarmac) of the same width as those of Nat West and Santander and indeed things would be seem to be Covid-safer since the whole arrangement is in the open air and customers do not enter confined indoor spaces. (Mind the kerb notices will be displayed) Trader-customers would be separated by more distance than is often seen in open businesses, i.e. the depth of the stalls and more if necessary since the trader could 'stand back' save for accepting payment as occurs in many supermarkets etc. The two-way pedestrian traffic would have the same width of pavement (indeed often more) than that available to the accepted safe practice outside of Nat West and Santander. This arrangement is also seen on the North side outside Specsavers, Boots and W H Smith / Post Office) again presumably with the blessing of EH. *Note also that EDDC, of which EH is part have only last week allowed erection of a scaffold outside the Card Factory that reduces the two-way pedestrian traffic flow to about 1.5 metres width.*
- d) *These vehicles could be parked outside the open businesses or as was the case prior to recent introduction of the car-boot-style market, along the street using unoccupied pitches or in the Silver Street car park as 'Howling Wolf coffee' does currently.
- e) Thus there is space for traders' customers to walk in front of the stalls if a direction arrow was imposed. This would be identical to the arrangements of open retail units which leave a pedestrian area of up to 2.5 metres.

Since this queuing/two way pedestrian arrangement is already in use and **identical if not more spacious than the arrangements made by Nat West Bank and Santander** as evidenced by tape on the street and accepted by EH, the customers of those banks and by the passing public then it must be suitable for stalls if they are erected opposite those shops that are not allowed to open for two weeks. In other words there is space for traders in this two week window especially given that government advice that is changing daily and it would avoid the charge that HTC (and EDDC via EH?) is discriminating against the Street Traders, especially given the relaxation applying to open air markets given by our Government.

A further advantage is that this would give invaluable experience for the future of the market.

Note also Market Days are limited to Tuesdays, Thursdays and Saturdays.

Stephen Hill

3. North side, Baptist Church to W H Smith.

I find it difficult to see any easily available sites here especially given the scaffolding approved by EDDC and its' EH division whilst under Covid restrictions.

4. North side of the High Street, East of W H Smith.

Similar arguments apply to the length up to and including Costa but in fact given the width of the paving then the traders would not necessarily have to move further into the road. Traders' vehicles would be treated in the same way as on the South side. The loading bay outside St Pauls is also available since it has been used before for traders, for political party stalls etc. yet here the paving is twice that outside Nat West, Santander, Boots, W H Smith etc. It is notable that EH has not 'taped off' the benches here and thus EH is tolerant of the consequent acceptance of two persons sitting on each end of the benches as is seen every day of the week.

5. South side of the street old Post Office to New Street with the ' interruption' of the bakery.

Similar arguments apply here as to the areas outside the banks. However it is here that one of the traders handed to Mr McCullum and to Cllr Wyatt a well-written risk assessment. This has not been mentioned by Cllr Wyatt. In fact as I say Cllr Wyatt has not dealt with facts at all save cursory non-critical reference to three pages of documents provided Mr McCullum.

- a) The EH advice is dated 27 May. Much is made of the conclusion of this report. However in the report no mention is made to the EH tolerance of existing open businesses and therefore the apparent discrimination against a specific form of business, the Market traders. It is obvious from the date that this referral was recent and that accords with the failure of Mr McCullum to pursue any of the above described work, originated in great part by Carl in the last three days, and which obviously would not have been provided to EH. In fact the EH document leaves open the fact that they have not been provided with any information even to the description of alternative sites.
- b) Mr McCullum and Cllr Wyatt mentioned the Cattle Market. Notwithstanding the fact that it is privately owned and is up for sale, in the past week including today (28th) there have been cattle and sheep in pens. The place is heavily contaminated under foot with animal faeces and it is astounding that such a dumb proposal has been made. I cannot believe that EH would approve such a location for the sale of market products that include foodstuffs and I anticipate a letter from EH saying that they were not aware of this incredibly unhygienic proposal, as of course they are not aware of the above arguments and which **lay us all open to the charge of discrimination**. In this context I assume that Mr McCullum made EH aware that he is Chairman of the Honiton Chamber of Commerce and as such is severely conflicted in that he would of necessity pursue the

Stephen Hill

interests of his sponsoring businesses which include several of the closed (for two weeks) shops. I will of course ask the Mayor to forward this document to and ask them if they were aware of any of the points herein. **EH** can access proof of the above by reading the Chamber of Commerce website.

- c) Mr McCullum and Cllr Wyatt mentioned the cattle market (long term) car park. This is owned by EDDC and that organisation is severely cash-strapped. In fact Mr McCullum acting as EDDC Councillor voted for increases in the car park charges prior to the lockdown and I doubt if EDDC would contemplate closing this car park especially since it is used by residents and businesses that have season tickets and therefore have a contract with EDDC.
- d) Mr McCullum and Cllr Wyatt mentioned All Hallows field. Although owned by EDDC this is restricted in its use. In fact complaints of tyre gauging into the surface etc have routinely been made even after the one-day Charter day celebrations in Honiton. I would not expect HTC to pick up the bill for any restoration of the surface.
- e) The above may be construed as delaying tactics to avoid the Market taking advantage of what is its legal right as per the Market Charter to trade on the High Street. The recommendation (not an instruction) by **EH** has obviously not been properly informed and in particular there is no mention of the unbelievable unhygienic suggestion about the Cattle Market. Given the date of the **EH** letter (yesterday), then it would be useful for HTC to require of its employee Mr McCullum copies of the correspondence to **EH** and when he first contacted them. It is also obvious that the blatant discrimination between the rights of the Market Traders and the currently open businesses has almost certainly not been put to **EH**.

Conclusion. I strongly recommend that the Open Air Street Market be allowed to open beginning next Tuesday. The overriding demand of **EH** that a risk assessment be made is done in this document and oddly **already by EH**. **EH** has allowed the footfall and queuing patterns serving the open businesses and this document, based on Carl's ideas, measurements and proven hard work is proof of **that active and accepted by EH** risk assessment to the public of trading businesses. Mr McCullum appears to have failed to point this out to **EH**.

John Taylor 29 May 2020

Ps. On a personal note I do not accept discrimination. I have a track record of establishing equal rights of which EDDC is well aware and I do this report with the same social attitude. Likewise I am concerned about expenditure of HTC that appears to be unjustified and evidenced by this report. I will be submitting it with other documents to the Internal Auditor. It is my duty as described in the Good Councillors Guide.

Stephen Hill 13

J Taylor Identification of pre-existing risk assessments for Honiton Street Market. 29/05/2020 page4 of5.

This is a note to the Mayor and Cllrs. I would be grateful if you would email this document as an attachment to HTC Councillors. I believe that it would be necessary to get a majority of the Council to agree by email or otherwise of opening the Market, preferably by midday today under the conditions described. A simple majority would do especially since the EH advice is merely a recommendation without any facts provided and without any consideration of the actual site since it appears that Mr McCullum has only contacted them at the last minute. For it to be otherwise would imply that I am critical of EH in not observing equity of treatment between traders etc and that I do not mean to imply. I would like this submission to you to count as agreement to open the Market.

Stephen Hill 18/4

This is Part One (as of Monday 29 May 2020) of a risk compliance required by HMG re the opening of HTC Street Market. This is an overall description of Principles since no effort has been made by either Mr McCullum or Cllr Wyatt to consider measurements etc. Cllr Zarzcynski and I give those details in Part Two and which will be collected on Sunday 31 May 2020. A short answer to Mr John Harding is made in Part Three in which I elaborate on the duties of Parish Councils as opposed to superior Councils such as District e.g. EDDC.

1. On Thursday 28 May 2020 a meeting was originally arranged with Carl, Market Assistant and Cllr Wyatt for 11.00. I believe that Carl invited Market Traders since they may have experience of other Markets. Following the likelihood that Cllr Wyatt would not make it then the Mayor asked me to attend given that I often (until 2017) stood in for Mr McCullum and located the Traders to their Pitches etc whilst Mr McCullum was on holiday, once for 4 weeks. *[I took payments for pitches, hire of equipment that I erected (no longer available since Mr McCullum sold the equipment) etc that I handed to the Office. Receipts for all payments were given from a paginated 'duplicate' receipt book.]*

- a) I understand that Cllr Wyatt then said he was available 10.45 – 11.15, which meant that I would still be needed.
- b) From the Boston Tea Party end I approached the rendezvous at St Pauls at 10.35. Mr McCullum was there but was engrossed in consecutive phone calls. At about 11.55 I became aware of Carl, Cllr Wyatt and two market traders approaching from the West, i.e. from the direction of Lace Walk. It appears that Carl had met Cllr Wyatt in/near New Street and they turned left into the High Street walking towards Exeter and then must have crossed over. They met the traders near Lace Walk.
- c) Carl and Cllr Wyatt described that they had made measurements of pavements at various points in the street. I note that Cllr Wyatt makes no mention of this data in his opinion. In fact Cllr Wyatt makes no mention of Carl's ideas that were substantiated by hard data nor does he mention that he made measurements

2. South side (Lloyds bank then HSBC etc)

I do not think Carl and Cllr Wyatt made measurements of the road but it must be noted that the road is asymmetrical. From the kerb by Complete Meats to the central white line is 11 paces, from the white line to the kerb at Lace Walk 7 paces. It follows that there is more room on the South side (Complete Meats side) to move stalls into the road, protected by the traffic cones and tapes on the street. This would not change the traffic flow from the usual market since traders frequently have vehicles parked behind their stalls so there would be space if the vehicles were relocated*. Some vehicles could be parked in the 'gaps' caused by trading premises (a, below) thereby protecting the Traders from passing traffic.

- a) Carl's suggestion is that stalls would be located opposite entries used by businesses that are not trading until at least two weeks time. Thus no market stalls would be located in front of Nat West, Santander or Complete meats. Lloyds bank 'does not queue in the High Street so that roadside is available to the Market. The full description is given in Part 2.

Stephen Hill 15

- b) Nat West and Santander have markings on the ground for customer 'spacing' (Lloyd's customers queue in New Street), with the consequent 2 metre markings on the ground for queues. **It is obvious that Environmental Health (EH) have accepted this as 'Covid-safe' as long as the queue is unidirectional and the pedestrian two-way traffic is confined to the remaining pavement.**
- c) Given that the Market stalls could be moved a metre into the road where the trader's cars have been often parked then that would free up a unidirectional queuing area (indicated by chalk arrows on the tarmac) of the same width as those of Nat West and Santander and indeed things would be seem to be Covid-safer since the whole arrangement is in the open air and customers do not enter confined indoor spaces. ('Mind the kerb' notices will be displayed). Trader-customers would be separated by more distance than is often seen in open businesses, i.e. the depth of the stalls and more if necessary since the trader would 'stand back' save for accepting payment as occurs in many supermarkets etc. The two-way pedestrian traffic would have the same width of pavement (indeed often more) than that available to the accepted safe practice outside of Nat West and Santander. This arrangement is also seen on the North side outside Specsavers, Boots and W H Smith / Post Office) again presumably with the blessing of EH. *Note also that EDDC, of which EH is part have only last week allowed erection of a scaffold outside the Card Factory that reduces the two-way pedestrian traffic flow to about 1.5 metres width.*
- d) *These vehicles could be parked outside the open businesses or as was the case prior to recent introduction of the car-boot-style market, along the street using unoccupied pitches or in the Silver Street car park as 'Howling Wolf coffee' does currently.
- e) Thus there is space for traders' customers to walk in front of the stalls if a direction arrow was imposed. This would be identical to the arrangements of open retail units, which leaves a pedestrian area of up to 2.5 metres.

Since this queuing/two way pedestrian arrangement is already in use and **identical if not more spacious than the arrangements made by Nat West Bank and Santander** as evidenced by tape on the street and accepted by EH, the customers of those banks and by the passing public then it must be suitable for stalls if they are erected opposite those shops that are not allowed to open for two weeks. In other words there is space for traders in this two week window especially given that government advice that is changing daily and it would avoid the charge that HTC (and EDDC via EH?) is discriminating against the Street Traders, especially given the relaxation applying to open air markets given by our Government.

A further advantage is that this would give invaluable experience for the future of the market. Note also Market Days are limited to Tuesdays, Thursdays and Saturdays.

3. North side, Baptist Church to W H Smith.

I find it difficult to see any easily available sites here especially given the scaffolding approved by EDDC and its' EH division whilst under Covid restrictions. In fact best policy would seem to keep the whole of this side up to W H Smith (PO) stall free. This would give unfettered access to Lace Walk and its car

Stephen Hill 16

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park to and from the pedestrian refuge and thus to footfall, wheelchairs etc from New Street. The scaffolding is in the way of the popular pitches that would be reinstated post-COVID.

4. North side of the High Street, East of W H Smith.

Similar arguments as in paragraph 2 apply to the length up to and including Costa but in fact given the width of the paving then the traders would not necessarily have to move further into the road. Traders' vehicles would be treated in the same way as on the South side. The loading bay outside St Pauls is also available since it has been used before for traders, for political party stalls etc. yet here the paving is twice that outside Nat West, Santander, Boots, W H Smith etc. It is notable that EH has not 'taped off' the benches here and thus EH is tolerant of the consequent acceptance of two persons sitting on each end of the benches (1 metre spacing) as is seen every day of the week.

5. South side of the street old Post Office to New Street with the 'interruption' of the bakery. Similar arguments apply here as to the areas outside the banks. However it is here that one of the traders handed to Mr McCullum and to Cllr Wyatt a well-written risk assessment. This has not been mentioned by Cllr Wyatt.

6. Cllr Wyatt has not dealt with facts at all save cursory non-critical reference to three pages of documents provided but not authored by Mr McCullum.

- a) The EH advice is dated 27 May. Much is made of the conclusion of this report. However in the report no mention is made to the EH tolerance of existing open businesses and therefore the apparent discrimination against a specific form of business, the Market traders. It is obvious from the date that this referral was recent and that accords with the failure of Mr McCullum to pursue any of the above described work, originated in great part by Carl in the last three days, and which obviously would not have been provided to EH. In fact the EH document leaves open the fact that they have not been provided with any information even to the description of alternative sites.
- b) Mr McCullum and Cllr Wyatt mentioned the Cattle Market. Notwithstanding the fact that it is privately owned and is up for sale, in the past week including today (28th) there have been cattle and sheep in pens. The place is heavily contaminated under foot with animal faeces and it is astounding that such a dumb proposal has been made. I cannot believe that EH would approve such a location for the sale of market products that include foodstuffs and I anticipate a letter from EH saying that they were not aware of this incredibly unhygienic proposal, as of course they are not aware of the above arguments and which lay us all open to the charge of discrimination. In this context I assume that Mr McCullum made EH aware that he is Chairman of the Honiton Chamber of Commerce and as such is severely conflicted in that he would of necessity pursue the interests of his sponsoring businesses which include several of the closed (for two weeks) shops. EH can access proof of the above by reading the Chamber of Commerce website.
- c) Mr McCullum and Cllr Wyatt mentioned the cattle market (long term) car park. This is owned by EDDC and that organisation is severely cash-strapped. In fact Mr McCullum acting as EDDC

Councillor voted for increases in the car park charges prior to the lockdown and I doubt if EDDC would contemplate closing this car park especially since it is used by residents and businesses that have season tickets and therefore have a contract with EDDC.

- d) Mr McCullum and Cllr Wyatt mentioned All Hallows field. Although owned by EDDC this is restricted in its use. In fact complaints of tyre gauging into the surface etc have routinely been made even after the one-day Charter day celebrations in Honiton. I would not expect HTC to pick up the bill for any restoration of the surface.
- e) **No account has been taken of the location of the primary and secondary schools and the fact that only this week 2 metre spacings have been painted for the benefit of pupils arriving on foot.**
- i. The three 'central' options therefore increase the traffic exposure to hundreds of children and teenagers crossing the road where this traffic would flow. About ten years ago, on the same road and at a second pedestrian crossing point about a hundred yards from this crossing point beside the Cattle Market, a 14 year old male pupil was struck by a vehicle, was in intensive care for two months and emerged with "life-changing injuries".
- ii. The recent painting of the social distancing markings for the students highlights the fact that the primary school will be partly open tomorrow and that the secondary school, already open for children of essential workers and less able pupils will be more active, especially starting 16 May. Mr McCullum has not bothered to approach the schools.
- f) The Market Charter gives a legal right to trade on the High Street. The recommendation (not an instruction) by EH has obviously not been properly informed and in particular there is no mention of the unbelievable unhygienic suggestion about the Cattle Market, the requirement for EDDC to breach contract with residents, or the damage done to the only central green space in Honiton much less the well remembered 'almost death' of a young life. Students contemporaneous with that boy are parents now and may not take lightly to the deliberate increase of exposure to risk for their children. In their place I most certainly would not. Given the date of the EH letter (yesterday), then it would be useful for HTC to require of its employee Mr McCullum copies of the correspondence to EH and when he first contacted them. It is also obvious that the blatant discrimination between the rights of the Market Traders and the currently open businesses has almost certainly not been put to EH.

John Taylor 29 May 2020

Sunday This is Part Two (as of 31 May 2020) of a compliance required by HMG re the opening of HTC Street Market. This comprises a map, a detailed measurement of where pitches would be, and notices required to be displayed by traders and/or HTC as Market Charter Administration. HTC again emphasises that the pavements are currently accepted by EH as suitable for access to many businesses

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and that the current signage etc by businesses is the ultimate responsibility of EDDC not HTC, which is a Parish Council with no powers even of advice and thus no insurance etc in any EH matter. Like any other business HTC will comply in similar ways, with the added requirement of advice to Traders instead of advice to employees.

There follows a list of sites and the distance from where a traders' car usually is to the wall and then the width of the pavement (kerb to wall). It does not mean that the trader would need to be as far into the road but could be. This is because the carriageway is very wide here, in fact over 10 metres from kerb to white line. Mr McCullum has given me instructions in the past as to how far I could 'go out'. I had to leave the width of a giant tractor plus a yard.

	Furthest back of to wall.	Kerb to wall i.e. pavement width	
*Lloyds Bank	6.3m	3.7m	High Street entrance closed
*The Patisserie	<i>is closed but even if open could queue back into Black Lion Court.</i>		
HSBC	6.2m	4.1m	No queue guidance here
Spar	open shop	open shop	No queue guidance here
Nat West	4.7m	3.1m	Queue to the west
*Aposthegpa closed	6.5m	2.8m	
*Cards and Things (empty)	6.5m	2.8m	
*Hunters Hair closed	6.5	2.8m	
Complete meats	open shop	open shop	
*Bruvs	8.1	2.9	
*Moshulu	8.1	2.9	
Barclays	open	open	
Santander	open	open	
<i>There is a driveway entrance here.</i>			
*William Hill closed			
*Cofi closed	7m	3.6m	
Bradleys	7m	3.6m	
*Empty	7m	3.6m	
*WBW solicitors	7m	3.6m	

This is the South side of the street to the west of New Street. The asterix indicates where a stall could be allowing distance between them and as follows,

- Lloyds bank – Entrance to Black Lion Court –Patisserie. One stall
- Apos – Hunters. Two stalls
- Bruvs-moshulu. Two stalls
- William Hill- Cofi one stall
- Empty – WBW one stall

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Crossing the road then it is proposed to leave from Baptist church to W H Smith as car parking especially as an EDDC recently planning approved scaffolding has reduced the pavement to 4 feet wide.

Outside W H Smith/PO is a 3.7m wide pavement that continues past

*four closed shops. Charity, Coral bookies, Gertie and B, Costa

Normally from the back of the gazebo for stalls outside these shops is from 8m to 6.7m from the wall.

The kerb to the wall is 3.7m. This therefore is well in excess of the requirements.

Because of the open ends and a driveway in the length it is possible to fit 4 COVID compliant stalls.

* Loading bay. This is ten metres from the edge of the bay to the foot of the monument. The width would allow 3 COVID compliant stalls.

Crossing the road to the old post office and starting at the barbers we see

Shop	back of the Gazebo if one	kerb to wall	inner of the step to the wall
*Barbers	5	3.5	2.9
*Dillys florist	5.9	4.0	3.2
*Stags	5.8	3.9	3.2
*Boots	5.7	3.5	3.3
Crusty Cob	6.0	4.0	3.4
*Hospice SW	6.0	3.8	3.4
*Shauls Baker Closed	5.7	3.8	3.2

Here the barbers to boots would be one stall selling cards etc and from Hospice on is one selling fruit and veg. The Crusty cob is open. Again plenty of space to comply with the guidance.

Notices are required. They will be laminated A4. The type face will be chosen appropriately for:

1 First notice content. This notice will be on a cone at pavement entrances to the market strings of stalls

CORONAVIRUS

BE AWARE

SAVE LIVES

PROTECT THE NHS

Anyone can spread coronavirus.

IF YOU OR ANYONE IN YOUR HOUSEHOLD HAS A SYMPTOM, Hot skin on chest, elevated temperature dry frequent coughs, loss of sense of smell or taste.

PLEASE DO NOT USE THE STREET MARKET OR QUEUE FOR SERVICES.

Return home, go on line to nhs.uk to check symptoms via the on line 111 service and follow the advice.

Only call 111 if you cant get on line. FOLLOW THE ADVICE.

Stephen Hill 20

Queue for the stalls using the one way systems.

2 SECOND NOTICE CONTENT As for notice 1 this will be at the 'entrance to a string'
WE HAVE CARRIED OUT A COVID-19 APPRAISAL AND SHARED THE RESULT WITH
STALLHOLDERS

WE HAVE PROVIDED STALLHOLDERS WITH CLOTHS, 70% METHS OR 70% ISOPROPANOL IN A
PLASTIC CONTAINER WITH LID TO PREVENT EVAPORATION. WE HAVE ASKED THEM TO WIPE
THEIR HANDS WITH A WETTED CLOTH EVERY 20-30 MINJUTES UNLESS THEY ARE WEARING
GLOVES.

WE HAVE ASKED THE STALLHOLDERS TO MAINTAIN MAXIMUM DISTANCE WHEN TAKING
PAYMENTS.

WE HAVE ASKED THE LARGE STALLS WITH MORE THAN ONE TRADER TO MAINTAIN 2M
DISTANCES BETWEEN TRADERS AND TO BE AWARE.

WE ASK YOU TO BE AWARE AND NOT TO HANDLE ITEMS WITHOUT INTENT TO PURCHASE.
WE HAVE TAKEN ALL REASONABLE STEPS TO MAINTAIN A 2M DISTANCE BETWEEN STALLS.
PLEASE QUEUE FOLLOWING THE ARROWS

THIRD NOTICE this and the next will be also as people pass into the market string. The problem is that
there are several notices. People get rushed if they are all together. Positioning will be close to entry to a
string without overloading the readers.

SINCE 23 FEBRUARY MANY SHOPS HAVE BEEN SHUT AND EDDC HAS BEEN RESPONSIBLE
FOR ADVISING SHOPKEEPERS TO PUT DOWN SEPARATION TAPE GUIDANCES
THE PAVEMENT MUST BE USED FOR MOVEMENT NOT CONVERSATION.
MAINTAIN MAXIMUM SEPARATION WHEN PASSING OTHERS. BE AWARE OF OTHERS

FOURTH NOTICE AS YOU ENTER THE MARKET THINK THAT YOU WASHED YOUR HANDS
BEFROE LEAVING HOME AND THAT YOU MUST WASH THEM WHEN YOU GET HOME. IT
FOLLOWS THAT IT IS SAFEST NOT TO HANDLE THINGS UNNECESSARILY.

FIFTH NOTICE (FOR STALL HOLDERS to display)
PLEASE DO NOT HANDLE ITEMS UNNECESSARILY

Stephen Hill 21

1 This notice will be on a cone at pavement entrances to the market strings of stalls

CORONAVIRUS
BE AWARE
SAVE LIVES
PROTECT THE NHS

Anyone can spread coronavirus.

IF YOU OR ANYONE IN YOUR HOUSEHOLD HAS A SYMPTOM, Hot skin on chest, elevated temperature dry frequent coughs, loss of sense of smell or taste.

PLEASE DO NOT USE THE STREET MARKET OR QUEUE FOR SERVICES.

Return home, go on line to [nhs.uk](https://www.nhs.uk) to check symptoms via the on line 111 service and follow the advice.

Only call 111 if you cannot get on line. FOLLOW THE ADVICE.

Queue for the stalls using the one-way systems.

Stephen Hill 22

2. This will be at an 'entrance to a market string'

WE HAVE CARRIED OUT A COVID-19 APPRAISAL AND VERBALLY SHARED THE RESULT WITH STALLHODERS. Written copy will be provided if wanted.

FOR THE FIRST DAY WE OFFER TRADERS PLASTIC GLOVES FOR CASH HANDLING ETC.

IF TRADERS ARE NOT WEARING GLOVES WE PROVIDE A BOWL OF SOAPY WATER AND PAPER TOWELS TO WASH HANDS FREQUENTLY IN ACCORD WITH GOVERNMENT ADVICE.

IF TRADERS ARE NOT WEARING GLOVES IT IS PLANNED THAT IF TRADERS WANT, WE WILL PROVIDE CLOTHS, 70% METHS OR 70% ISOPROPANOL IN A PLASTIC CONTAINER WITH LID. WE ASK THEM TO WIPE THEIR HANDS WITH THE WETTED CLOTH EVERY 20-30 MINJUTES.. THE COSHH STATEMENT CONCERNING THE ALCOHOL SOLUTIONS WILL BE AVAILABLE FOR TRADERS TO READ.

WE REMIND TRADERS THAT THE EDDC PUBLIC TOILETS ARE AVAILABLE.

WE HAVE ASKED THE TRADERS TO MAINTAIN MAXIMUM DISTANCE WHEN TAKING PAYMENTS.

WE HAVE ASKED THE LARGE STALLS WITH MORE THAN ONE TRADER TO MAINTAIN TWO METRES DISTANCE BETWEEN THOSE STAFF UNLESS THEY ARE CO-DWELLERS.

WE HAVE ASKED TRADERS TO BE AWARE OF OTHER PEOPLE AROUND THEM.

WE ASK THE PUBLIC TO BE AWARE AND NOT TO HANDLE ITEMS UNNECESSARILY.

WE HAVE TAKEN ALL REASONABLE STEPS TO MAINTAIN A 2M DISTANCE BETWEEN STALLS.

PLEASE QUEUE FOLLOWING THE ARROWS AND THE IN AND EXIT NOTICES.

Stephen Hill 23

3. This will be sited as people pass into the market string. The problem is that there are several notices. People get rushed if they are all together. Positioning will be close to entry to a string without overloading the readers.

SINCE 23 FEBRUARY MANY SHOPS HAVE BEEN SHUT AND SHOPKEEPERS HAVE PUT DOWN SEPARATION TAPE GUIDANCES. YOU WILL SEE SIMILAR MARKINGS BY THE STALLS.

THESE MARKINGS ARE IN A 'QUEUING LINE' WITH AN ENTRY AND EXIT. BE AWARE OF OTHERS

THE PAVEMENT IS USED FOR TWO-WAY MOVEMENT. PLEASE BE AWARE THAT CONVERSATION MAY BLOCK OTHERS FROM PASSING. BE AWARE OF OTHERS.

MAINTAIN MAXIMUM SEPARATION WHEN PASSING OTHERS. THE ANCIENT STREET PLAN OF HONITON MEANS THAT PASSING IS OFTEN CLOSER THAN TWO METRES. GOVERNMENT RISK ASSESSMENTS ADVISE THE TWO-METRE SEPARATION IS FOR STATIC PERSONS. PLEASE KEEP MOVING IF THE PAVEMENT WIDTH IS LESS ⁴.

Stephen Hill 2/16

4.
AS YOU ENTER THE MARKET THINK THAT YOU
WASHED YOUR HANDS BEFORE LEAVING HOME
AND THAT YOU MUST WASH THEM WHEN YOU GET
HOME. IT FOLLOWS THAT IT IS SAFEST NOT TO
HANDLE THINGS UNNECESSARILY.

5. (FOR STALL HOLDERS to display)

**PLEASE DO NOT HANDLE ITEMS
UNNECESSARILY**

5. (FOR STALL HOLDERS to display)

**PLEASE DO NOT HANDLE ITEMS
UNNECESSARILY**

5. (FOR STALL HOLDERS to display)

**PLEASE DO NOT HANDLE ITEMS
UNNECESSARILY**

Stephen Hill 25.

Mr J Harding
EDDC Environmental Health Officer (Commercial).

01 June 2020

Dear Mr Harding

My name is John Taylor. I am a Honiton Town Councillor and have recently been given the task of producing a risk advice for the staff of HTC during the lockdown prompted by the SARS-CoV-2 coronavirus and its attributed disease named COVID -19.

The Mayor, Mr John Zarzcynski gave me the tasks in part because I am the only Councillor with a proven track record of Genetic Engineering that is inclusive of viral infections that for example cause cancer. For example when I worked at the Medical school of the Middlesex Hospital, subsequently University College London (my Alma Mater) Hospital Medical School following the 1987 Med School mergers I was Biological Safety Officer (i.e. I signed off my advice to the School and appropriate Government Department) and was responsible for the risk assessment of all genetic manipulation laboratories in the Hospital and its Med School. I myself worked on (and headed up) projects that then required a Category Three containment facility. As Safety Officer responsible for genetic manipulation I was responsible for assessing a group working on Human Papilloma Virus (HPV) in the Windeyer Building Cleveland Street, and the hazard to the immediate workforce, the medical school and of course the general public who would be in the vicinity of the building As you will know there is now a very successful preventative vaccine for HPV, not produced by the Middlesex/UCH group. The vaccine is of course Gardasil 9 and is now (since about 2008?) given to schoolgirls in secondary school and will be extended to schoolboys. As you will know the virus is a necessary requirement for cervical cancer and is transmitted through intimate relationship and boys are carriers with (mostly) no presenting symptoms. I bore you with this so that you will be informed that I am not ignorant of the medical language surrounding SARS-CoV-2.

I have read your recent communications concerning the HTC Street Market and I have contributed to the Compliance document produced by the Mayor, John Zarzcynski. I emphasise the word compliance sine I work within the guidelines produced by the Government and which have presumably have detailed risk assessments and which are not to my knowledge published. I have sought to identify hazards (I emphasise not risk) that are compatible with the Government guidance and have therefore made suggestions that will mitigate those hazards in line with the Government guidelines. I am absolutely confident that you have been doing the same for all of the commercial activities in your purview. I also accept that you have the powers that you describe in your communications.

Stephen Hill 26

I do however question your suggestion that HTC has been responsible for advice to businesses on the High Street and public notices relating to such and to the establishment of social spacing guideline on

the pavement. HTC is a Parish Council (not in the historical Church sense). It was established in the 1974 local Government reorganisation that saw the abolishment of the Honiton Borough and the creation of EDDC, the superior Council to HTC. Subsequent creation of very large Parishes such as Weston-super-Mare (largest by population to date, superior council North Somerset) and Shrewsbury (second largest by population, 80,000?, superior Council Shropshire?) in 2004 and 2009 Local Government legislation repeats the duties of Parish Councils. They have no powers in such things as environmental enforcement, planning enforcement etc. However where HTC has assumed responsibility for such things as parks, footpaths, community centres then as caretaker or owner HTC has the appropriate responsibilities. HTC cannot advise businesses as to how they conduct health and safety and nor can HTC put up public notices relating to the same except on property for which HTC is responsible. I note that you have received this advice from Mr McCullum and I am disappointed that he should have apparently misled you as to his employer's powers. HTC employs Mr McCullum as Town Manager and as such he should comment etc to the Council who could then in turn report such concerns to EDDC but since Mr McCullum's role was created by the Town Clerk, Mr McCullum has not provided a single sentence of report to HTC.

I have asked the Mayor if he would consider apologising to you for creating the situation in which you find yourself. Indeed as Market Manager it was for Mr McCullum to have created an appraisal for HTC and he has not done so. In fact he closed a market completely when, for example stalls selling eggs, cheese etc would seemingly have been allowed to remain open.

For my part I apologise for what is in my opinion correspondence that has overtones of unnecessary conflict and blame gaming. I emphasise that I have not had sight of Mr McCullum's correspondence to you although I assume that the Mayor has been copied in. We are all in this together and we all wish to see the survival of businesses that, in the case of the Market Traders, are not in the 'safety nets' paid for by the Government and to whom we have as great a duty as Mr McCullum does to the members of Honiton Chamber of Commerce of which he has chosen to be a member although he has no business interest of which I am aware and of which he is chairman.

Yours sincerely

John Taylor

Stephen Hill 27

Created 04 June

An Appraisal of Honiton Street Market during the coronavirus outbreak.

This document and accompanying excel spreadsheet is based on a risk assessment authored by EDDC for the Gate to Plate promotion of Devon foodstuffs. Two copies of the EDDC Gate to Plate risk assessment were sent to Mr Tony McCullum in his roles as HTC employee and EDDC Councillor. Mr McCullum has not offered the document nor given any advice but fortunately I have obtained a copy and refer to it occasionally.

1. Introduction. John Taylor (HTC Councillor) writes this and I have an immediate problem. Letters from Mr J Harding of EDDC stating that the two metre social distancing is demanded by HMG have baffled me. Of course I have given thought to this but I cannot see how any commerce could have continued if such a rule was literally and vigorously enforced.

- a) Consider for example the pavement from Lloyds bank (corner of New Street) to Santander on a normal weekday in the past week. Every minute there were people queuing outside premises and walking past those people queuing were people going in both directions. In fact it is impossible for anyone to maintain a two-metre gap from everyone else. The only way to do that would have been to treat the pavement as a conveyor belt, control the people who got on that conveyor at say the New Street end and then stop it to allow those assigned to queue for a given premises to enter, conduct their business and get back on the conveyor. Those people would then have to remain on the conveyor and use a one-way return walkway facility that could not be on the pavement since it would have to be two metres away from the conveyor belt. This is of course tripe and I realise that Mr Harding is not proposing this but I use it for emphasis.
- b) HMG stated that the two-metre rule applied to people who were static in relation to each other. I emphasise that HMG did not thereby allow people to hug each other simply because they were not static. In other words joggers cannot hug each other as they go along. HMG stated that an aerosol infection takes time and HMG suggested a fifteen-minute 'static' period with less than two metres was to be avoided.

- i. The 'static' condition makes more sense since it explains the queuing layouts adopted by the supermarkets etc and that have recently been painted in Northcote Lane for the school children. Those in the queue are static in relation to each other. In the High Street it allowed people (in both directions) to pass by the queue. The passers-by were obviously limited to the pavement by the kerb and the parked cars that define the width of the pavement. Similar arguments apply even more so when pavements are narrow such as in New Street. It is notable that the passers by are frequently within a metre of one another. It would seem therefore that the pedestrian behaviour that we have seen on pavements in Honiton is consistent with this interpretation.

Stephen Hill 28

- c) It is obvious that EDDC Environmental Health have accepted the behaviour in the streets of Honiton and other towns in the District. It is not the responsibility of HTC since HTC is a Parish Council, a point I have elaborated on in previous communications.

2. The 'opening of Open Air Markets'.

- a) This is where the problem appears to come in the recent correspondence with EDDC Environmental Health (EDDC-EH). It is demanded that HTC must find a central large site for the Charter permitted street market. This is impossible. I have listed the arguments in previous correspondence attached to this email from the Chairman of HTC who is usually also the Mayor of Honiton.
- i. The Cattle Market is privately owned and is loaded with animal faeces.
 - ii. The EDDC Silver Street car park is owned by EDDC and that organisation needs every penny it can get and has contracts with long term parkers.
 - iii. The All Hallows playing fields are the only central green space in Honiton and as such is required for example by flat dwellers for their mental health during the relaxation of the lockdown. There are many other considerations that tell against this site.
 - iv. All three options would increase traffic resulting in increased risk to the multitude of children crossing the access roads to get education that presumably Majors in how not to get killed by motor vehicles.
- b) But why a large site? It is quoted that the two-metre rule applies. That means a two metre deep gazebo needs a one way queuing system in front of it (one-metre wide with two metres between those queuing, a two metre gap for one direction foot traffic going one way (three metres in effect since people are not actually as Lowry painted them and a two (actually three) metre gap for the opposing foot traffic. Thus each avenue (of traders) would need a minimum of nine metres. The distance between each gazebo would need to be four metres so that traders did not approach closer than two metres. I know of no market that would possibly approach this except maybe car boot sales on large expanses. Of course car boot sales were not included in the Open Air Market relaxation.

3. This application is dependent therefore on the interpretation of Open Air Markets. Outdoor markets come in different styles.

- a) Our Traders are in effect a shop located on the highway (the Charter Rights) and therefore are mirror images of the fixed buildings with respect to the pavement that those buildings use for customer access. We are therefore designing the positioning of the stalls to mimic the fixed shops. Concerning distancing between stallholders they are requested to access their stall from one side only. If they use a gazebo with 'sides' then they would be separated from the neighbouring stallholder by those sides. This is the equivalent of walls between shops.
- b) We will place marks on the road and/or pavement as some shops do to indicate the queuing areas. We note that there are no queuing 'two-metre separation lines' outside of Spar, Ali's Kebab, the two butchers and the pet supplies shop in the High Street. There are no markings the butcher, for Leasons and for the newsagent in New Street. In the case of New Street passers-by

Stepha
Hill
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are often required to step into the road. That would not be the case for the street market customers whose risks are identical to those using the High Street at present.

- c) We will provide cloths soaked in 70% solution of methylated spirit for hand hygiene of traders. It is notable that the hand hygiene provided by supermarkets for trolley and basket users is antibacterial and therefore useless in destroying viruses. Note I do not use the word kill. Viruses are not alive.
- d) We will provide advice to traders similar to that provided by supermarkets etc to their employees. We have already provided details of notices etc that will be applied to the street market.

Steph
H/11 30

Honiton Street Market under coronavirus. Assessment. This should be read in addition to previous letters.

Assessment of risk

Activity etc	Hazards	People at risk	Severity 1-4 see letter	Likelihood see letter	Risk rating see letter	Existing controls	Further action/ observations to control risk
Queuing area	Slips, trips	All in queuing area	2	2	2	Usual street surfaces etc. No unexpected street hazards, usual surfaces	No hazards from stall in queuing areas. Stallholder keeps apart from customers except for
Vehicle movement in stall spaces prior to market. This category does not include highway traffic that is subject to usual Highways laws and procedures. It is a street market.	Impact on pedestrian, injury	All in street, anywhere on street, normal risk from traffic on any road.	4	1	2	Trader vehicles where possible to the side of stall to 'protect' the rear of stalls from passing traffic. All stalls behind traffic cones and tapes to the rear of stalls. Or trader vehicles off-site	Removal of stalls etc. the queuing area by the stall will be closed, equipment stock etc moved forward to allow vehicle to draw up behind stall if necessary.
Public presence	Lost children, Vulnerable adult.	Child, vulnerable adult such as less able, dementia etc	4	1	1	In plural overt care of market staff and stall holders pending arrival of police and appropriate emergency service	Minimise close contact, maximise social distance commensurate with duty of care and humanity.
Removal of HTC equipment, traffic cones, tapes, signage re social distancing, 'be aware', queuing requests etc.	Working near traffic.	HTC employee Carl (Mr McCullum is self- certificated absent). Volunteer Councillors who have section 8 training, experience as market assistants	4	1	2	Removal of traffic cones, tapes, signage (eg beware of step) occurs after Traders leave.	Social distancing between staff. Recording of staff for contact tracing if subsequently necessary.
		Carl has been					

Stephen Hill
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Signage needs. These are increased due to coronavirus. Extra Notices are detailed in a previous risk compliance.	Trip hazard if placed on pavement.	All.	1	1	1	Large signs on road warning approaching traffic of the street market.	Laminated signs on A4 paper. Placed on stalls and A-boards. A-boards will be in the gutter except where near street furniture eg bins
Working near traffic.	Impact from vehicle	Carl and possibly volunteer Councillors	4	1	4	trained by the Market Manager according to safety procedures and risk assessment written by the manager.	Maximise social distance between staff.
Manual handling	Lifting of cones. Transport by truck.	Carl and possibly volunteer Councillors	2	1	1	HTC has recently provided a new truck following a proper complaint by Carl.	No change from current practice. Risk assessments, working practices etc produced by the Market Manager
Erection, safety compliance etc of stalls.	Hazards during erection /removal from manual handling, traffic etc	Hazards to passing traffic, to pedestrians on the footpath, etc.	3	1	3	This is covered by the Traders procedures. All traders are required to be insured and in particular have public liability insurance.	Social distancing by stallholders is their duty. They will maintain a list of co-workers for possible contact tracing need.
Virus specific considerations	The hazards are listed in previous paperwork.	All.	4	1	1	Staff to self-assess illness symptoms of hot skin on chest, diarrhoea, dry hacking cough, loss of taste and/or smell, breathlessness, HTC has arranged to waive	Staff provided with gloves, hand anti-viral (not antibacterial) solution dampened cloths etc. Staff will not handle money. HTC has arranged to waive

Stephen Hill
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diabetic, heart, market charges.
kidney complaint Seating and bottles
staff from public of water will be
contact. provided.

Stephan Hill
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Severity, fatality=4, major injury=3 lost time injury=2 minor injury=1. Likelihood, certain = 4, likely = 3, may happen = 2, unlikely = 1. Risk rating evaluation is detailed in the EDDC Gate to Plate documentation. These categories are taken from the EDDC Gate to Plate Risk Assessment form which is used as a guide.

Mr J Harding, EDDC Environmental Health Officer (Commercial).

Friday 06 June 2020

Dear Mr Harding

1) I really do not want to write this letter because it will seem to be critical of you. I apologise if you take it that way. I answer you email of even date in order, but have no paragraph numbers to refer to.

2. You have a list of potential locations for stalls on the high street. It is contained within Part two of the document entitled HTC Market COVID compliance proposals.

a) The list begins on page 4 of that document. The list gives the depth of sites that are available to the traders and that 'depth' is easily obtained by subtracting the distance from the kerb to the building (i.e. the pavement). The distances are more than adequate for the inclusion of a queuing area in the gutters but since your letters I am advising that we queue on the pavement; a circumstance that is exactly the circumstance that you have been permitting for the shops that are open on the High Street for the past ten weeks. What is allowed for one entity in this country is allowed to another I believe because otherwise would be discrimination.

b) A week ago you were sent two images of google maps for the High Street that lists the names of shops, banks etc. That information allows you to locate the list to the list of sites in 2a.

c) We do not have a list of traders since it is an on-demand street market. We have a list of regulars, occasionals and there may be new ones. That is what a market is all about. We have a reduced number of pitches until 15 June because we are limiting pitches to being opposite open shops. That limitation will fall on June 15 again due to equality of treatment. Your friend and EDDC Councillor Mr McCullum keeps the lists. He has not provided any because he has not done any preparation for reopening as allowed by law. Fortunately we have a Market Assistant who does all the work who, because he comes in at 06.00 on market days is there to position traders etc. He has many of the traders phone numbers and that is how we intend to start tomorrow. I will assist with the 'traffic coning etc' and we have a number of other Councillor volunteers. *[My drive comes from the fact that these traders do not benefit from the £10000 gift from the government, do not benefit from 80% of their pay. In other words they have no income whilst many others do.]*

3. We will be providing welfare facilities for the traders. Your suggestion of communal hand washing facilities astonishes me for the following reasons:

a) I have commented on the possible dermatological risk in the email of yesterday when I described Axminster market.

b) Although warm soapy water is the preferred option it needs to be changed and more importantly the suds must be rubbed into the skin since it is the micro-bubbles that disrupt the membrane of the virus (in SARS-CoV-2 case derived from the membrane between the endoplasmic reticulum and golgi bodies of the cells of the infected person shedding the virus. I did not see anyone making use of this facility at Axminster yesterday.

c) Soapy water does not disrupt fungal spores. If a trader has a fungal infection, which is more common in the general population than people think, and especially under fingernails, then the potential for cross-infection is great. Chlorinated solutions destroy fungal spores, c.f. swimming

pools. I do not think I can demand traders cut and (nail)brush their fingertips before leaving home.

d) However I will provide a stainless steel bowl with soapy water etc but I sincerely hope that traders do not share this risk.

e) We can always ask traders to go to the EDDC toilets in King Street that are open 07.30 – 16.00.

4. I suggest methylated spirits because, for example it is used routinely in topical cleansing of skin in surgery in Australia. It is 95% ethanol and 5% methanol with a chemical added that produces profound vomiting when a small amount is ingested. I suggest diluting it to 70% (except for cleaning electrical equipment) since that percentage avoids precipitation of the spike proteins in viruses and such precipitation can protect the membrane and the nucleocapsid within which the genetic material is found. [If you want a full description of the virus, its replication mechanisms (it is a single positive strand RNA virus) etc that I boned up on before reading the Government advice then I am more than willing to provide that technical work.] We have tried to buy isopropanol. It is sold out.

a) COSHH for methanol. The COSHH regulations allow the use of chemicals if there is 1) no safer alternative (isopropanol sold out, my opinion that communal soapy water is itself hazardous), 2) is contained in my suggestion in a plastic lidded sandwich bowl with a cloth to rub a small amount of the 70% solution over hands, 3) the disposal is safe because the solution evaporates from the skin rapidly. That is what some hand-sanitisers do i.e. the 70% ethanol ones. The smell lingering on the hand is useful. If one seek to scratch you nose or rub your eyes the smell is a potent reminder of the danger of that activity.

b) I have stated I will provide your preferred option. No one will use it just as they do not in Axminster.

c) I will provide thin disposable gloves suitable for money handling. Latex gloves themselves raise a common risk of allergic reactions.

d) For your information, methanol is generated in the body in much greater quantities than could remotely be suggested as crocking the skin from the topical application. The main source is carbohydrate, which explains why potatoes produce so much during their metabolism. Obviously Pectin (used to gel jams etc) that occurs in all fruits produce large quantities. In fact orange loads your blood up nicely. But the buffering system in the blood prevents acidosis that would be seen if one drank ten mls of methanol.

e) If you are commenting on the office then it is not relevant to this proposal?

5. Point 4 is merely a repeat of HMG advice to individuals. We will restate it when the traders arrive but, as is evident from the risk assessment for the Gate to Plate, traders are responsible for provision of their own safety. It has not been sent to traders since we are not privy to their personal details. That is restricted by data protection legislation to Mr McCullum I believe. And as you know he has not been forthcoming with reports.

Stephen Hill 35

Yours sincerely

John Taylor

Rose Cottage
3 St John Close
High Street
Honiton. EX14 1PN

Sunday 11 September 2020

Mr Mark Williams
Chief Executive, EDDC (East Devon District Council),
Blackdown House,
Border Road
Heathpark Industrial Estate,
Honiton. EX14 1EJ.

This is an MSWord document, by attachment to email from a friend.
Copy sent similarly to Mr Henry Gordon Lennox, Head of Legal Services, EDDC.
Strictly confidential - I include personal medical data under data protection legislation.

Dear Mr Williams

1. Introduction.

- I am John Taylor, elected 2019 Councillor (Cllr) of Honiton Town Council (HTC).
- This is a complaint about the EDDC Independent Investigator (Standards) Mr Tim Darsley in a matter of three 'combined' complaints from 1) EDDC Cllr McCollum and employee of HTC, 2) Mrs Sonia Hawkins employee of HTC and 3) Mr John Burgess, member of the public and Administrator of a trolling website called Honiton Forum which has been easy to screen shot.
- Everything I state can be backed by emails, letters, photographs. Mr Darsley has not accepted any of the photographs I sent him that prove the criminal breach of Health and Safety legislation by EDDC Cllr McCollum, the line manager of Mr Carl Cracknell. EDDC Cllr McCollum's failure in that regard resulted in payments from HTC to the Masonic lodge to which he belongs. Mr Darsley telephoned me for an interview, and wrote his hearsay interpretation. He argues that this technique is acceptable evidence. I cannot see how, for example Mr Burgess could provide evidence other than interpretation of letters, without knowing the background to those communications. In my Risk Assessment everything I say is fair comment from a person more highly qualified in assessing viral risk than Mr McCollum and unlike him I actually wrote a draft risk assessment for Mr Cracknell and have provided appropriate workwear etc from my own funds.
- In a draft report Mr Darsley has asserted that I am guilty of bullying Mr (EDDC Cllr) McCollum. I have until 6 p.m. on Monday 12 September to provide arguments against that conclusion. Given the numerous conflicts for EDDC apparent in this case I have had this letter sent by email to give EDDC good notice of some of my upcoming arguments. For example Mr Darsley has not interviewed Mr Cracknell, the only person present at the discussions about the Street Market

Mr Mark Williams cc HGL 12 September 2020. Page 1 of 9

This document has supportive evidence that can be provided. It has been produced quickly. A small collection of email evidence has been provided to Mr Darsley. Mr Darsley has SMS/MMS texts photos that have yet to be reproduced in suitable hard copy.

Stephen Hill 36

Reopening who has worked the market since March 2019 and who resigned in October in disgust at his treatment; the ultimate form of complaining about bullying.

- I have been unable to use email since Friday 23 January 2009. HTC Cllr Carrigan sends this document as an attachment to an email. I have asked Cllr Carrigan to copy this, in strict confidence to my Chairman Cllr Zarzcynski to confirm the integrity of his emailing system.
- As I say Mr Darsley has ignored many photographs inclusive of the working conditions of an HTC employee Mr Carl Cracknell. He has drafted a report that went to HTC Cllrs, then also the Human Resources Committee but within an hour was in the hands of members of a political group called Honiton Forward (HF). In many media/social media posts HF has claimed correspondence with Mr Henry Gordon Lennox.
- I cannot understand why Mr Darsley has included evidence from Mr Burgess yet fails to discover the route by which Mr Burgess got my draft Risk Assessment for the Street Market within an hour of it being sent to HTC Cllrs.
- I have evidence that EDDC Cllr McCollum and his wife have provided public support for that group.
- This complaint includes reference to EDDC property.

2. Specific criticisms concerning Mr Darsley's behaviour and potential conflicts inclusive of EDDC.

This section lists summaries consistent with the title. Evidence/Arguments for these summaries is in section 3 and the paragraph numbers of this section 2 are 'used' in section 3.

- a) I assert that Mr Darsley has shown gross bias on gathering data and refusal of data when provided to him. Obviously my qualifications may have 'belittled' Cllr McCollum in his view. His education and work experience differs from mine but that is no reason to describe that difference in qualifications as 'bullying by intimidation'.
- b) I assert that Mr Darsley has shown gross bias in interpretation of evidence when provided to him.
- c) I assert that Mr Darsley uses confidentiality arguments to frighten me and to deny my right to question the integrity of evidence. I have text exchanges to that effect.
- d) I assert that Mr Darsley applies answers from witnesses in one complaint to confirm his bias needed for a related Investigation. In other words Socratic reasoning/questioning as once used extensively in Psychiatry but now disproved in the majority of patient outcomes. In this case for one example it applies to Mr Darsley's use of Cllr Zarzcynski's statements in the Dimond/Mackarness 'investigation to the current complaint.
- e) I suggest that EDDC may have overlooked conflicts of interest in that:

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- i. EDDC (attended by Mr Henry Gordon Lennox) have previously been an Interested Party in a High Court action involving me. Mr Darsley was the Independent Investigator in that matter also. After the Standards Committee Hearing that ultimately led to that waste of public money, Mr Gordon by email to EDDC Cllr(s) Phil Twiss and Mike Allen stated: If we had known then what we know now then there would not have been a Standards Hearing. I emphasise that I do not question Mr Gordon Lennox's Integrity just that there is a conflict.
- ii. EDDC agreed to drop hands in my/their costs in that case. I agreed that offer. However now there is potential for previous losses by EDDC to influence any Standards Hearing procedure or advice.
- iii. Cllr McCollum is a senior (chairman of a Housing Committee) member of EDDC and a member of the majority political alliance presently just in a majority of EDDC Council members. I believe members of that political grouping, if on the Standards Committee, have a potential conflict of interest.
- iv. Part of the work that I was instructed to do by HTC involved EDDC property.
- v. EDDC should have instructed a neutral Investigator.

I assert that EDDC has been drawn into an attempt by a grouping within Honiton to attempt to remove elected Cllrs and to put forward their proposals that benefit existing entities (posted Saturday 10 October 2020 by former Cllr Kolek, her husband, and two other others). A screen shot is available.

3. Evidence/Arguments.

This is by no means comprehensive. It is written under time pressure from Mr Darsley.

- a) In early May, HTC voted for me to do a risk appraisal (RApp; note this was not a full Risk Assessment RAss) for limited use of the HTC offices (Rapp-Office) by some staff during the SARS-COV-2 lockdown. All members HTC 'agreed by email' that I write the Rapp-Office because for several years I was Biological Safety Officer for the former Middlesex Hospital and its Medical School in Mortimer Street. Part of this duty was to write RAss for laboratories working with 'human' viruses, often highly pathogenic. In fact I have worked with such viruses and still advise. The RApp-Office won strong approval from in particular HTC Cllrs Kolek and Pollington. I obtained PPE for the office at my own expense.
- b) In late May I was assigned by the Mayor to be part of the group writing a RApp for the Street Market (RApp-SM). For example I communicated with EDDC Environmental Health Officer Mr Harding and, for example, at his behest I wrote a COSHH for some materials now used routinely in 'handwashes' in shops. No other person in HTC had/has the training, vocabulary

Stephen Hill

Mr Mark Williams cc HGL 12 September 2020. Page 3 of 9

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etc for such tasks. I believe that possession of expertise greater than any person involved in appraising risk of reopening the Street Market, either within HTC or the complainants Mrs Hawkins, Mr McCollum and of course Mr Burgess, does not justify a claim against me of bullying by belittlement when applying that expertise. Nor can the simple statement of facts in a one-off draft Risk Assessment be called bullying, see footnote. Nor can the identification of repeated failure of Duty of Care by an employee, described as that employee having done no work, be considered bullying. It was simply statement of facts, in confidence, to the HTC HR Committee and identification of risk to my Council's Interests. In this context I note that Mr Darsley, in a previous complaint about Councillor Carrigan describing Mr McCollum as being 'invisible' was dismissed by Mr Darsley as blunt but measured. This was not breach of confidence by Mr Carrigan. The report was sent to the Clerk who distributed it to all Councillors, which meant that it went to Mrs Hawkins and Mr McCollum.

- c) It was with dismay that in the course of the commission I encountered a complete absence of a RAss for the Street Market (RAss-SM) and for its Assistant Mr Carl Cracknell who was appointed in March 2019. Although Mr Cracknell's appointment took HTC over the five-employee limit that requires a written RAss; a point I made in the RApp-Office document, because Mr Cracknell has always worked exposed to traffic then there should have been an existent RAss-SM. There was not. This was probably contributory to Mr Cracknell's resignation in or about October 2019 since Mr Cracknell complained about the non-existent PPE. Mr Cracknell was persuaded to stay following promises of improvements in working conditions. Furthermore it emerged that Mr Cracknell had not even been given a Contract. Mr Cracknell's working conditions were examined at that time by his senior line management comprising HTC Human Resources (HR) Chairman Cllr Sheridan Shaw and the Town Clerk Mr Tredwin who reported to Council. Mr McCollum, Mr Cracknell's immediate line manager was not at that examination of working conditions presumably because he was well acquainted with those conditions. Of the promises made, Mr Cracknell only received a written contract, but even that had a 'DRAFT' watermark throughout. [*Note - in late February 2020, on a market day, Mr Cracknell and I had a conversation about the emerging SARS-COV-2. During that conversation Mr Cracknell made reference to how cold and wet the winter had been. I texted Mr Cracknell that I noted his complaint as bullying and I have copied that text and Carl's reply to Mr Darsley. He has not referenced it.*]
- d) Following the lockdown these matters were put on hold however I was given the task of writing and/or contributing to the RApp-SM I. Accordingly when I was assigned at short notice to be present at the discussion about reopening the Street market I documented my actions carefully. Mr Darsley has that documentation. However, and in confidence I verbally told my Chairman, Cllr Zarzynski of my discovery of the breach of the Health and Safety at

Mr Mark Williams cc HGL 12 September 2020. Page 4 of 9

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work Act 1974 and later legislation involving for example high-vis workwear (e.g.2013) relating to the working conditions. The working conditions were highly hazardous.

- i. The street market traffic cones were stored in dangerous conditions behind the Masonic lodge that I knew had had a major facelift that I had assumed included conditions underfoot. Mr Darsley has MMS texts + photographs of that storage area. Mr Darsley has ignored this data in his draft report.
- ii. EDDC Cllr McCollum knew of a safe storage area owned by EDDC behind the toilet block in Lace Walk car park because he has made use of it for 10 years. (It is this link to EDDC that explains why I make the point that Mr McCollum is an EDDC Councillor). Mr Darsley has MMS texts + photographs of that storage area before and after I confirmed (via the Mayor, EDDC Cllr Phil Twiss and a highly efficient EDDC officer, name unknown to me) its availability due to an existing licence from EDDC. Mr Darsley has ignored this data in his draft report.
- iii. Mr McCollum failed to provide appropriate high-vis PPE for Mr Cracknell, whose job is on the High Street. For example Mr Cracknell was not given high-vis warm rain wear that meets the standard EN ISO 20471. Mr McCollum attired Mr Cracknell in a black un-insulated plastic jacket and over-trousers. That obviously breaches the 1974 Health and Safety at Work Act (H&S 1974) and any breach is subject to criminal law. I have personally funded Mr Cracknell's current safety wear and again using MMS texts + photographs I have provided Mr Darsley with pictures. Mr Darsley has ignored this data in his draft report. EDDC Cllr McCollum has never written a risk assessment concerning Mr Cracknell.
- iv. Mr Darsley has thereby edited out the above from his report consequently avoiding any negative data impacting his conclusion that EDDC Cllr McCollum was bullied rather than the obvious one that over 19 months that Mr McCollum bullied Mr Cracknell because he failed in his Duty of Care responsibilities as line manager to Mr Cracknell. I believe this to be a classic case of conflict for EDDC given the involvement of an EDDC Cllr and an EDDC appointed 'Independent Investigator'.
- v. Former HTC Cllr Sheridan Shaw and Mr Tredwin recommended the storage area behind the Masonic Hall citing Mr McCollum recommending that the only alternative lay at the Beehive. Mr McCollum agreed with the Masonic lodge a £300 rent for storing the cones. Mr McCollum is a member of that lodge and declares his Masonic link in the Register of Interests as an EDDC Cllr but obviously there is no such attribution within HTC.

Mr Mark Williams cc HGL 12 September 2020. Page 5 of 9

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Stephen
Hill
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- a. It was my misfortune whilst I was a member of the group discussing the reopening of the Street Market to discover much of this about the HTC Town Development Manager and in particular the fact that since March 2019 Mr McCollum had done no work to comply with H&S legislation with regard to Mr Cracknell and had recommended pecuniary gain to his private members club coincident with multiple breaches of H&S at Work Act 1974.

4. Other background.

- a) I believe that EDDC is conflicted. I will be making a formal complaint about the behaviour of EDDC Cllr McCollum to the Monitoring Officer however of course that will be a conflict situation. I refer you to the behaviour of DCC in Greenslade v DCC as what I believe to be an appropriate mechanism of which you are no doubt aware.
- b) I emphasise in advance that I intend no wording or construction that may be considered offensive to EDDC, to yourself or Mr Gordon Lennox. In fact EDDC officers have been prompt and EDDC generous in confirming the use by HTC of the safe working area behind public toilets on the Lace Walk car park. I provide facts and offer my truth(s) as supported by those facts.
- c) Since the 2019 election there have been numerous public claims of complaints to the EDDC Monitoring Officer (MO, Mr Gordon Lennox) against HTC Councillors. EDDC recently replied to a Freedom of Information (Fol) from Mr Harvey Ingram. The data did not include contacts that were received but were not formally progressed. I will be requesting that number. Mr Harvey-Ingram is a former Councillor of HTC, former Chair of the HTC Employment Committee that imposed an unlawful Sanction excluding me from Council in December 2015. That unlawful Sanction by HTC, leading to a precedent decision in the High Court (Taylor vs HTC), arose from a Standards Hearing at EDDC in November 2015 involving a report from Mr Darsley acting as an Independent Investigator. That report was extensively challenged at Standards as should be included in Minute notes taken by Officers of EDDC. The report was neither disavowed nor moderated. I will be requesting the Minute notes. I also note paragraph eight of the Judgement of Mrs Justice Jefford in Greenslade v DCC, second application for Permission for a Judicial Review Tuesday 15 January 2019.
- d) This relates particularly to one of several Independent Investigations into me recently or currently conducted by Mr Tim Darsley.
 - i. I have had at least one investigation (hereafter entitled Dimond-Mackarness) result that did not support that complaint. The complaint concerned a public meeting that was video recorded. In other words data had less chance of being misrepresented.
 - ii. Recently because of a 'number of complaints' Mr Gordon Lennox has recently written to me stating that he would combine some complaints into a single investigation as he legally has the option so to do.

Mr Mark Williams cc HGL 12 September 2020. Page 6 of 9

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- iii. Obviously I accepted this and following a draft report from Mr Darsley and text exchanges with him I have had confirmed by him that three complainants were so 'bundled'.
 - iv. I did not realise that this 'bundling' applied only to me and that a complaint against "four councillors" by former Town Clerk Mr Tredwin, made public by him on social media was excluded.
 - v. It appears that Mr Darsley interviewed Councillor Zarczynski as a witness to the three aforementioned complainants whilst investigating the Dimond/Mackarness complaint.
 - vi. The pick and mix approach to investigations by Mr Darsley will impact on the as yet to be pursued complaint by Mr Tredwin that he (Tredwin) posted on social media. The Deputy Town Clerk Mrs Heloise Marlow subsequently publicly named the four HTC Councillors as Zarczynski, Carrigan, Coombs and Taylor. That complaint predates my being notified of the current investigation by Mr Darsley that is the primary subject of this letter yet has been put on hold by Mr Gordon Lennox. Mr Darsley will have been notified of that preceding complaint since he is the Independent Investigator of choice of EDDC (<https://eastdevonwatch.org/2016/08/18whose-standards-2/>). I am informed by Councillor Coombs that correspondence has occurred with Mr Gordon Lennox that confirms that Mr Darsley was involved in the decision to delay Tredwin complaint. As a consequence there appears to be a denial of due process to Councillors Zarczynski, Carrigan, Coombs (and myself) in the Tredwin matter which, given the context of the complaints would inform any Investigator with new data. Mr Darsley has included in this investigation a witness statement from Mrs Marlow that does not name me and nor could it since I have had minimal dealings with Mrs Marlow and Mr Tredwin for at least a year and Mr McCollum for at least three years (because of the social media trolling of me by his wife).
 - vii. Interviews conducted by Mr Darsley have fused more than one investigation.
 - For example an interview of Councillor Zarczynski included questions relating to the Dimond-Mackarness investigation. For example Mr Darsley questioned about Cllr Carrigan and me talking and about me being disrespectful to Mr Burgess. In reply to recent texts from me Mr Darsley has implied I broke HTC Conduct rules by asking Councillor Zarczynski about his evidence as quoted by Mr Darsley. HTC conduct rules states interested Parties and so I am free to enquire as to the witness of Councillor Zarczynski as given to Mr Darsley
 - The three complainants so bundled include people who obtained a draft document sent to the HR Committee of HTC. I am surprised that Mr Darsley does not state how MR Burgess, Mr Hawkins and Mr McCollum came to be in possession of the draft.
- e) There is extensive published evidence that a coordinated campaign (social media such as 'Honiton Forum', 'Nub News', political groupings such as 'Honiton Forward') is being conducted

Mr Mark Williams cc HGL 12 September 2020. Page 7 of 9

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against Councillors of HTC elected for the 2019-2023 term. Please note that the Chairman of Honiton Forward is former HTC Cllr Sheridan Shaw who was at the top of the line management of Mr Carcknell.

- f) On 7 October 2020 (two days ago) the Honiton Chamber of Commerce (CoC) issued a press release criticising HTC and have made false incorrect allegations. For example since 2007 there have been three resignations (two of whom moved from the town) and zero litigations from members of staff. The CoC claims "numerous" for these categories. The honorary president and recently Chairman of the CoC is EDDC Cllr McCollum who continues to work for EDDC whilst signed off sick with HTC. There are five men of seven persons with responsibilities in the CoC. Four are freemasons. Two (Mssrs Hanratty and Sheridan Shaw) are former HTC Cllrs who have resigned since April.
- g) Mr Darsley is conflicted due to past history inclusive of a High Court Judgement of Mr Justice Edis. That Judgement, involving EDDC as an Interested Party was won in principle by me and Costs so awarded. However a partial adverse costs judgement was made by Mr Justice Edis. Inclusive of the judgement was the submission of a report by Mr Darsley. That report was flawed and EDDC will have contemporaneous notes made during my Standards Hearing in that matter. Subsequent to the adverse costs judgement as to partial costs there has been an application for a Judicial Review (Greenslade vs DCC) heard by HH Mrs Justice Andrews (now Lady Justice of Appeal). In a renewal of that application review Mrs Justice Andrews Jefford asserts (paragraph eight) that an Independent Investigators report is deemed a Statement of Truth. However at the Standards Hearing Mr Darsley's report was successfully challenged as to its conclusions. I request EDDC provide the notebook of the Minute taker of that hearing.
- h) Mr Darsley has insisted on his timetable yet it is obvious that I cannot 'do' email:
- i. In context I thank Mr Darsley for using HTC Councillor Carrigan as my 'post-box' and Mr Darsley for his understanding. I am also very grateful for Councillor Carrigan for agreeing to this arrangement.
 - ii. I have communicated with Mr Darsley via SMS text. I have provided images (via MMS text) consistent with criminal bullying of Mr Carl Cracknell by Mr McCollum together with text explanations. None of these communications appear in Mr Darsley's draft report and its conclusions.
 - iii. I assert that Mr Darsley's timetable is discriminatory against me since I cannot use email.
 - iv. I regret that I believe EDDC is not a suitable entity to pursue this matter due to numerous conflicts and that this matter should have been submitted to another local Government organisation or preferably to an experienced Counsel since all local Government entities have an interest in the outcome of this matter and would be conflicted.. Mr Darsley was not balanced in his draft report.

Stephen Hill
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Notes Fol to EDDC for the number of bullying complaints against members of HTC was made by Mr Harvey-Ingram. Total complaints against HTC councillors were given. Only recently have complaints been followed up by independent investigation. Hub news 14 August Hannah c. 38 total 2017 2020. 2017 – 17 received 3 cited bullying. Cllr Carrigan co-opted Dec 2017. Randle temp Clerk still.. 2018 - 2 complaints 1 cited bullying. Mark Tredwin employed Jan 2018. 2019 –1 complaint 0 bullying. 2020 until end July. 8 received 5 cited bullying. Coincides with co-opted Cllrs and employment deterioration with Mark Tredwin. Coincides with the Hannays. Does not include contacts that were received but were not formally progressed.

No bullying complaints **internal** to HTC have been received for 2017- 10 February 2020 except the resignation of Mr Cracknell. When Mr Tredwin walked out of a meeting and threw his illness certificate on the floor then bullying became the preferred word.

I reserve the right to add other data, complaints etc.

Yours sincerely

John Taylor

Footnote. I refer you to the advice of the Health and Safety Authority, 'Bullying in the Workplace'. Bullying is repeated actions. The production of a report for a HR Committee is a one-off thing and if by being critical of Duty of Care responsibilities then no manager could administer the legislation. My report is fair comment to a restricted management entity (HR Committee) required by legislation. I have had no dealings with Mr McCollum save for the meeting on the High Street about the Market. I did so because Mrs McCollum has used social media for numerous attacks on me.

I cannot use email due to previous hurt. –Strictly confidential - In 2007 my then employer's line management's governing body concluded that I was suffering bullying. I had followed the bullying and harassment procedure and had a full day meeting with the Governors. The harassment did not stop and email (with paper copies) was used as a tool for that mismanagement. I broke down at 4.20 in the afternoon of 23 January 2009 at an emergency consultation with my GP. On the two subsequent consultations a medical colleague accompanied my GP to assess risk of self-harm. My body continues to produce large quantities of cortisol (the flight/fight response mediating hormone) if opening letters in white envelopes, emails and some other situations. I was 'successful' in both an Employment Tribunal and a Personal Injury claim. Friends open white envelopes of no indicated origin on the envelope. I do not use email.

Mr Mark Williams cc HGL 12 September 2020. Page 9 of 9

This document has supportive evidence that can be provided. It has been produced quickly. A small collection of email evidence has been provided to Mr Darsley. Mr Darsley has SMS/MMS texts photos that have yet to be reproduced in suitable hard copy.

Stephen Hill
4/4

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Other background and some evidential documents listed as Stephen Hill.

I produce some documentation. I have many times this amount. I have had several communications with Mr Gordon Lennox that I have asked him to produce if suitable for propagation. I have a large number of texts to Mr Darsley. I have more photographs illustrating such things as hazards relating to alternative market sites, the use of barrier tape that was not used prior to my risk assessment of June 2020, the provision of simple equipment such as chairs, the provision of drinking water, the provision of a first aid box etc. Carl has completed a first aid course.

I first became aware of mounting problems concerning Health and Safety within the Honiton Street Market when Carl Cracknell resigned in or around October 2019. I knew that there was involvement of the HR committee but I was not included given that GDPR issues were involved. My actions and voting were consistent with my following the Presumption of Regularity etc but I did approach both Mr Tredwin and Mr Sheridan Shaw on a confidential basis. In a meeting Council were told that on one market day Mr Tredwin and Cllr Sheridan Shaw had shadowed Carl Cracknell for a time and approved the workplace etc which I assumed would have included checking out an appropriate risk assessment. Council was informed that the space behind the Masonic Hall used to store the cones was the only available space. I suspected that it was not so and that there was probably EDDC owned storage behind the toilet block in Lace Walk. On a date of which I am uncertain but before Christmas I approached Mr Tredwin on the subject. I got a few words out before Mr Tredwin stood up and told me to get out. By coincidence I went to Tesco's later that day and bumped into Cllr Sheridan Shaw. After an amiable start to conversation I offered Cllr Sheridan Shaw the envelope containing hand-written notes prepared for my meeting with Mr Tredwin that was still in my carrier bag and suggested that he might wish to read my submission prepared for Mr Tredwin but sadly he refused.

In January and late February I observed, but did not interfere, that the mistreatment of Carl Cracknell became worse. At some point I knew that he had suffered a back injury in part through using a poorly maintained sack truck. I listened but was constrained in any actions by the events prior to Christmas. To complicate issues Mr Tredwin had walked out of the 8 February Council meeting claiming bullying and throwing a Doctor's certificate to the floor (it may have landed on a desk). Some Councillors followed. The events were videoed. Things got worse for Carl Cracknell such that he spoke again to me and on Tuesday (a market day) 18 February at 11:14, I was sent a first ever phone communication:

- John" My number.. Best Carl..

There followed an interlude when I again bumped into Carl on the High Street while he was working. I emphasise that I live on the High Street about 80 yards from the main area of the Street Market and so frequently walk there to access newsagents, food stores, Post Office etc. So on Saturday (a market day) 29 Feb at 09:29

- Sorry to hear that McCullum has been bullying again. I did call but it cut off. Don't let it drive you into isolation. John T
- Thanks J.. I'm ok & Tony is an arse.. Best C..

There were no further communications until after lockdown on 23 March.

What was I to do? Mr Tredwin had gone off ill, Mr Randle had come in with several advice lines that had proved or would be proved to be unlawful, who did I approach?

The decision was made for me. The Government ordered a lockdown and the risk to Carl was no longer extant. - until the opportunity came to reopen the market.

The opening events are well documented but I note that Mr Darsley has not asked for lots of emails etc from Cllrs Zarczynski and Carrigan. I was involved after successfully writing a risk appraisal for the Offices. Even Cllrs Kolek and Pollington approved of that work. And Heloise Marlow and Sonia Hawkins and Carolyn Bowles worked when there was no alternative to being in the office. When the opportunity to open the market came, initially I was not involved. I admit that I was thankful but my thanks were short-lived. I was asked to cover for the Mayor who could not attend and Cllr Wyatt who could only attend for half an hour at a meeting on the High Street. In correspondence Mr McCollum claimed to have been working on the reopening of the market from early in the month of May and such claims were supported by Cllr Wyatt who thanked Mr McCollum and Carl Cracknell for work. When we met up only Mr Cracknell produced any documentation inclusive of measurements of the street/pavements etc and suggestion for the reopening. [Note Mr Peter Allen's wife also produced an excellent CoVID risk appraisal and templates for trading from their stall.] The Mayor had agreed a meeting with persons to assess the opening risks in the light of HMG 'Guidance', a term used since HMG had done the risk assessments for the virus transmission etc. Somewhat confusing was that the advice included both markets in large dedicated areas (car boot sales?) and street markets. A good example of a street market was Axminster, which opened early in the month.

I use as a scaffold a series of documents sent to support a recent letter to Mr Stephen Hill, the newly appointed Clerk to HTC, because they form a structure for data concerning the opening of both the HTC offices and the Street Market hence there are annotations to Stephen Hill on some documents. I apologise for this.

- a) A three-page cover letter explaining to Mr Hill some computer files sent to him and therefore my actions except where additional documents have been included. I do this for transparency and am prepared to defend all comments in the cover letter to Mr Hill. I will provide copies of the files with the metadata if required. 3 sheets. Stephen Hill 1-3.
- b) Two sheets of notes (my file name SARS-CoV-2). The first page is specialist language and refers to experimental data I acquired from previous Biomedical Research contacts following phone conversations. The second page explains what I aimed to achieve in layman language when I wrote the Risk Appraisal for the HTC offices. Stephen Hill 4-5.
- c) Four pages entitled 'A short risk assessment and interpretation of UK government advice, particular to the working site of Honiton Town Council during the COVID-19 respiratory disease outbreak. Stephen Hill 6-9.

- d) Five pages entitled This was to be.... This is Part One of a risk compliance required by HNG. Paginated Stephen Hill 10-14. A modification of this together with 'public notices templates is next.
- e) Seven Pages beginning This is Part One ...(as of 29 May).. but including 'Part 2 (as of 31 May) of the market risk compliance. Paginated Stephen Hill 15-21.
- i. I note that parts of this document have been used as arguments that I diminished Mr McCollum. For example the use of the word dumb vis-à-vis the relocation of the market to the 'cattle market'. In fact there appears a photograph of the site saying that it was clean. I describe a hazard recognition that would be used for a risk assessment: The animals are there on Monday. The area is hosed down. The photograph is taken and amazingly it is asserted that there are no bacteria present. (Bacteria are very, very small). The weather is 'dry' until Friday. It rains. The rainwater goes into cracks in the concrete, between the metal fences and the floor etc. The non-visible (to my obviously very poor eyesight) bacteria are washed onto the concrete. The market opens on Saturday. A parent appears with a child in a pushchair and a two-year old who is grasping Teddy with a free hand. Teddy's feet drag along the concrete picking up bacteria. That night Teddy is in the child's bed – and the bacteria grow – a warm body, sweat (food source) etc. Next day or later the child 'sucks Teddy's foot. With luck the child lives to suck another foot? – Dumb? Or dead?
 - ii. I provided coherent arguments why Honiton Street Market should remain true to its Charter location. Actually I can produce newspaper articles from 1910 stating that the livestock market was moved from the High Street to accommodate advances in Hygiene. Honiton Forward, members of which supported the move is actually Honiton Backward – by 110 years in local government hygiene.
 - iii. These seven Pages beginning This is Part One ...(as of 29 May).. but including 'Part 2 (as of 31 May) of the market risk compliance. Paginated Stephen Hill 15-21 are self explanatory and data driven.
- f) Samples of the full sized laminated notices from e) above. 4 sheets annotated Stephen Hill 22-25.
- g) Letter to Mr J Harding 01 June 2020. 2 sheets. This was my first communication to Mr Harding and it was via the Mayor. All such communications were via the Mayor. However it described my role in the previous assessments as to how, why etc the Street Market should reopen. Annotated Stephen Hill 26-27.
- h) 02 June 2020. I was made aware that Mr Harding had demanded from Mr McCollum all risk assessment including CoVID. I did not anticipate the effect on Mr McCollum of this demand by Mr Harding. Mr McCollum self-certificated stress illness on the day following this email from Mr Harding.

- i) 04 June. An appraisal and spreadsheet of the needs to reopen the Street Market based on a model from the EDDC risk assessment documentation etc relating to Gate to Plate 2019. Annotated Stephen Hill 28-33.
- j) 06 June. Saturday. Market opens. Letter to Mr J Harding. Mr Harding attends the market, computer open and videoing it. I have other observations but they are unnecessary at this time.

I ask the Standards Committee to note that I have many other documents that support my viewpoints. I have not included them since my evidence bundle is becoming unwieldy. I am hopeful that Mr Gordon Lennox will include all of our correspondence in his bundle to the Court but I will have them to hand to support my arguments at the Hearing.

I use the word Court since Mr Darsley recognises it as such when he quotes: (Monday 21 September)
Dear Cllr Taylor The Standards system does not override or take away the rights and responsibilities of HTC as an employer. Thus when I identified the serious breaches of H&S law then had a responsibility to protect Carl Cracknell from harm. That abuse had been going on since 9 March 2019. To my mind that is repetitive bullying that necessitated a response from me. I note that my response to stopping the potentially lethal bullying of Carl Cracknell over almost two years has been assessed by Mr Darsley as a one-off bullying of the actual bullies Mr EDDC Cllr McCollum, Mr Tredwin and Mr Sheridan Shaw. I had a responsibility. Under the tactic used by Mr EDDC Cllr McCollum following his as required by Constitution meeting with Mr Gordon I have been forced to defend myself at this quasi Judicial Hearing. I ask the Panel – how would you stop criminal Acts by an employee risking the well being of another when the line management wont listen? My answer is that I obey the Nolan condition of selflessness – the opposite of selfishness- even though it appears that once again I will have to fund my defence of terrorised.

The witness statements.

Statement of John Taylor concerning the 'witness statements' that Mr Darsley has produced and the overarching criticism of Mr Darsley so-called 'Investigation'.

1. I began to answer this report but soon realised that there was no hard evidence in it. It is based on what people thought of a document when they had no idea of the facts behind it. No one knew of the appalling treatment of Carl Cracknell by Mr EDDC Cllr McCollum so could not appreciate the possible injuries that Carl may have suffered.

- a) It was simply a collection of assertions by Mr Darsley of what he thought a witness had said without him providing the context of serious breaches of Health and Safety legislation. My comments were in that context. They were then asked to sign it.
- b) Mr Darsley does not give the questions so the answers are irrelevant given that witnesses were expected to recall a telephone call. How many of the Standards Committee can recall verbatim a telephone conversation days after it took place?
- c) Mr Darsley has refused to let me hear the recordings of the interviews. I suggest that Mr Darsley looks at interview protocol for other bodies and should provide the person whom he condemns with copies. In fact in the unavoidable Application for Judicial Review, I will be suggesting that his technique is a breach of the Human Rights Act and in particular for me. My Professional life included being a Biological Safety Officer for numerous naturally occurring hazards inclusive of viruses and the genetic manipulation thereof. For two Hospital sites I signed off reports to the first ever, national body called the Genetic Manipulation Advisory Group (GMAG). It has evolved since but I still am asked for my opinion by active researchers and as such am plying my skills. Those skills include such things as identification of antigens on parasites like *Schistosoma* and the mechanisms involved in a human's immune response. See Taylor *et al.* EMBO Journal, vol 7 pp465-472 since that paper includes cloning of the antigen, expression of the antigen in yeast and bacteria, distribution of the antigen(s) within the parasite etc. I provide a copy for Mr Gordon Lennox's reading together with other papers concerning cloning of human genes, the chemistry of various toxins etc. Accordingly under article 6.1 of the Human Rights Act I claim the right for any hearing impacting on my professional qualifications to be held in public. I am astonished that Mr Wyatt claims that he was the only person with qualifications in Health and Safety.
- d) My expertise in identifying antigens (actually the various epitopes of, for example a protein) is useful in understanding HMG guidance for transmission and susceptibility to SARS-CoV-2.
- e) I repeat all of the witness statements are essentially personal interpretation of answers by Mr Darsley and many are solely hearsay. Some have gross errors. Can you remember the context of questions asked of you by telephone days later?

I select a few of the interviews simply because they illustrate the generic failure of Mr Darsley in editing the answers to questions that he does not provide.

2. Mr Wyatt.

- a) For example page 81 of 121 Mr Wyatt asserts that the appraisal document was sent in two parts. I certainly did not have it sent in two parts. I wrote on two days and thus two parts. The parts illustrate the speed at which circumstances were changing including the variations in the guidance emanating from HMG. There were no edited changes to part one of any significance save that it was modified to be consistent with part two which was as I say produced in response to the constant information coming out about the transmission routes etc of the virus.
- b) In paragraph 10 Mr Wyatt seems to have looked for emails and “found nothing to say that a report should have been completed by a particular date”. It seems to have missed MR Darsley’s (and Mr Wyatt’s) observation that the opening date for open air markets was set by HMG at short notice. Thus he would not have any emails about a particular date would he?

3. A good example of the impossibility of answering this so called investigation is the statement by Mr Jody Harding on page 85 of 121. I use Mr Darsley’s paragraph numbering.

1. No comment.
2. No comment save that Mr Harding does not confirm that he had observed the Axminster Market that was running then.
3. It is asserted that Mr Harding had contacted Mr McCollum in late May yet Mr McCollum asserted that he had been in contact for weeks in May. Inconsistent.
4. I fail to understand this. All Markets are by definition in the public realm none more so than Axminster that had been running for two weeks by the end of May.
5. Mr Harding complains that he was demanding the paperwork from Mr Zarczynski and me but that we were unwilling to give Mr Harding the paperwork he demanded. As I have stated on 2 June Mr Harding demanded all the risk assessment including the COVID ones. The whole point is that there was no paperwork to give. Mr McCollum had not done any work to produce any risk assessments over the entire previous years of his employment as market manager. I accept that a written risk assessment was not compulsory until Carl Cracknell became employed on 9 March 2019 but it is good practice to have one and indeed if an accident occurred and there was no risk assessment than even one’s public liability insurers could use it to refuse payment. It seems that Mr Harding cannot understand that paperwork that does not exist cannot be provided. Mr McCollum had provided no risk assessments, no PPE, no safer working area, nothing. So why cannot Mr Darsley recognise this – because it did not suit his agenda?
6. Harding states that a risk assessment was a legal requirement and that makes my point entirely, there was no risk assessment yet that was the duty of Mr McCollum especially as regards Carl Cracknell. This failure was primarily that of Mr McCollum but aided and abetted by his line management Mr Tredwin and then Councillor Mr Sheridan Shaw.
7. There is an assertion that my compliance proposal did not meet requirements – there was a lot of irrelevant content. There is no such thing as irrelevant content in H&S. The rule is put all the points out since the experience of a different person may see an additional risk that may need mitigation. In other words there is no evidence to back up Mr Harding’s statement. Mr Darsley

refused point blank to give me any of the interviews and it is apparent that there are no verbatim transcripts. As I have said elsewhere an answer can be transposed to a different context and that is called Socratic reasoning. It has been totally discredited.

8. Again there is a 'feeling' that it was "intended to be released in the public domain". Yet the work was only sent to the members of the Human Resources Committee that unfortunately due to Mr Nick Randle's unlawful suggestion was the whole Council and then Cllr Wyatt had voted for that blatant impropriety arising from a breach of GDPR, which requires that a minimal number of persons be given personal data of others. Mr Darsley states that Mr Wyatt had, on receipt of the work as a document sent to him as a member of HTC Human Resources, set up a Zoom meeting with participants such as Mr Burgess and many others inclusive of Cllrs Hannay, Kolek, Pollington. For Mr Harding to assert that it was his IMPRESSION that it was intended to be published is ludicrous. It is not evidence.
9. I see nothing wrong with the letter. It is factual and not unprofessional. I repeat that I was writing a report interpreting the GUIDANCE from HMG. HMG had done the risk assessments for the virus. Businesses etc were then expected to adapt to the guidance according to their particular circumstance. For example Axminster had done so and I had videoed it. That market was considerably less spacious than Honiton's and yet Mr Harding had tolerated the Axminster one for two weeks already.
10. The quote is incorrect. The use of the word friend was changed within half an hour of the issuance of the document to read friendly. It is time that Mr Darsley confirmed the correctness of his questions before he asked them. He used this quote in other witness so-called statements but which are actually hearsay rewrites and the actual answers are not provided to me. Mr Darsley issues his summary, and asks if a person will sign it. Each statement is therefore prone to being correct within the limits described on the phone yet may be incorrect over contexts larger than those elaborated in the question. This technique is not a witness report; it is an adaption of the witness interview. Also the interview was conducted by phone so a witness would probably not recall if Mr Darsley left out pertinent answers that would vary the context when read by others.
11. Mr Harding had reached the point where he was satisfied with arrangements – yet Mr McCollum had done nothing towards this. In fact on 29 June Mr McCollum withdrew from any dealings with the reopening of the market. Mr McCollum had produced nothing for that purpose; a reflection of his work vis-à-vis the previous 18 months when as I asserted that he does and had done no work to produce a risk assessment for the market prior to SARS-CoV-2. Instead he put Carl into as number of unlawful situations, created the situation that HTC was in criminal breach(es) of H&S statute but meanwhile he had ensured £300 was unnecessarily paid to his private members club.
12. The Mayor told Mr Harding not to communicate with Mr McCollum after Mr McCollum had gone off work with self-certificated stress. It would be against the law for Mr Harding to communicate with Mr McCollum in that situation after 3 June and I am surprised that Mr Harding and Mr Darsley are ignorant of that condition of employment law (Health and Safety).
13. It is obvious from Mr Harding's answer to point 11 that HTC had fulfilled all the needs. In fact Mr Harding visited the market on 6 June he had his laptop open and videoed as he walked through.

He diverted into W H Smith/the Post Office for six minutes. A suitable recording was saved. He did not write to HTC about the market and he repeated the videoing exercise the following week. It follows therefore that HTC had taken it seriously, had fulfilled the guidance otherwise Mr Harding would have issued a closure order. With regard to the quote 'other EDDC Cllrs' – that implies that Mr Harding knew that Mr McCollum was an EDDC Cllr – a fact he is described as denying in paragraph 10. I remind Mr Harding that Mr Harding's department sent the risk assessment for the 2019 gate to plate to Mr EDDC Cllr twice - once to him as Town Development manager and a copy as an EDDC Cllr.

3. Mr Carl Cracknell.

a) I have searched for the record of an interview with Carl Cracknell, HTC Street Market assistant and who was involved in every stage of the market reopening. I cannot find it but then I knew that Mr Darsley had not interviewed him notwithstanding that Mr Darsley had Carl's phone number. Indeed Mr Darsley phoned me to obtain Carl's number and since Carl was standing beside me I handed Carl my phone. Mr Darsley wanted the phone number of Peter Allen, Market Trader. For GDPR reasons Carl refused until he had spoken to Mr Allen and obtained his permission. Carl subsequently obtained permission and provided it to Mr Darsley when he phoned Carl an hour later..

b) WHY DID MR DARSLEY NOT PHONE CARL CRACKNELL FOR A WITNESS STATEMENT?

1. Could it be that Mr Darsley knew that Mr McCollum had placed Carl in positions of hazard to life and limb as detailed with pictures in my 3 December letter to Mr Gordon Lennox (enc)? The answer is Yes since I texted (MMS) the numerous pictures together with text (SMS) to Mr Darsley on 15 September prior to his final report'
2. Could it be that Mr Darsley did not interview Carl because his remit was limited by the limited wording of the complaint of Mr McCollum, that obviously because of the requirements of the EDDC Constitution, must have been issued after the meeting with Mr Gordon Lennox; that meeting being required by the constitution of EDDC whenever an EDDC Cllr proposes to make a complaint about a Councillor of a Junior Council (here HTC)?
3. Could it be that the wording came out of the meeting between Mr Gordon Lennox and EDDC Cllr McCollum and the wording of the complaint, made after those of Ms Hawkins and John Burgess was discussed in the meeting?
4. I have had a Freedom of Information request answered on point 3 above. There are no minutes, which surprises me since it involved a Constitutional matter, the Monitoring Officer HGL who is Head of Legal at EDDC and the person responsible for choosing Mr Darsley. Mr Gordon Lennox obviously subsequently, in his own words, decided to merge the complaints of Ms Hawkins Mr Burgess and EDDC Cllr McCollum and, to quote, that such a merger was in his power.

The above points and the time between the complaints will be a point in my Application for a Judicial Review. If the Application is successful I will expect Mr Gordon Lennox to comply with a Duty of Candour and to at least try to remember the conversation with Mr McCollum. Obviously I accept that Mr Gordon Lennox's memory will suffer from the same criticisms that I have made of the investigative technique of Mr Darsley.

4. It saddens me that:

- a) I will be taking the so-called witness statements to an Application for a Judicial Review and thereby an assessment of their use by a High Court Judge..
- b) For the review I will be reproducing the pictures sent to Mr Darsley on 15 September and to Mr Gordon Lennox on 3 December concerning the EDDC property, the property of the Freemasons.
- c) For the review I will reproduce the minutes of HTC and the Report Agenda item 14, 11 November 2019.
- d) The pictures re b) above reflect the gross breaches of H&S law resulting from the behaviour of Mr McCollum, behaviour that could have led to serious outcomes for all HTC Cllrs had Carl Cracknell been hurt.
- e) I will have to explain to the Judge the £300 orchestrated to the Freemason lodge and not simply have it published as part of this witness bundle of mine that is written for an open meeting of the Standards Committee as is my right.
- f) I have to reproduce a newspaper article 25 January 2013 in which Mr McCollum states that he had withheld spending on Health and Safety Equipment and that I can prove from HTC accounts that Mr McCollum's attitude has not changed since that day. Indeed he went down the High Street and bought dark blue rainwear trousers, dark brown fleece and steel capped boots without Carl trying them on following Carl resigning (approx Oct 2019) yet if Cllr McCollum had walked 200 yards from Blackdown House to Screwfix he could have purchased all the 2013 compliant high-vis wear. It is not heavy to carry the 200 yards back to Blackdown House.
- g) That I have to reproduce a political advertisement of Mr McCollum in the February 2020 edition of Honiton Village News in which he is wearing a 2013 high vis inclusive of arms, rain proof, insulated, jacket taken outside of 'French Hen' (owned by his friend and fellow Freemason) on a market days with the (paraphrased) message – come talk to me as your EDDC Cllr about your problems. Find me on the street.
- h) Following the reopening of the market with which in his interview with Mr Darsley, Mr Harding found no fault – oops sorry this does not sadden me, that the reopening was done whilst sadly Mr McCollum was not at work having self certificated illness.
- i) Please note that I am not saddened that following Carl's advice I bought him appropriate high vis rain wear, (just like EDDC does for its Streetscene workforce but yellow not orange), barrier tape to string between cones to make people think before taking heightened risk in crossing the road, equipment for the reopening of the HTC office (hand gel, marigold gloves, clothes etc) and similar for the Market. Provided a table on which Carl can place a cup, a chair on which he can

sit, a gazebo in which if he chooses can be erected to protect him for the weather and most importantly he asked me for these things so that he could have a sense of pride in the job. There are other thing of which I am content, most importantly that the market still exists although with the present lockdown it is threadbare with food only stalls. And most important I thank EDDC for confirming that HTC has a license to use the hard surface area behind the Lace Walk toilets thereby removing a high risk slip hazard etc that was unnecessarily being paid for with £300 to Mr McCollum's Freemason's lodge.

Rose Cottage
3 St John Close
High Street
Honiton
Devon. EX14 1PN
3 December 2020

Mr Henry Gordon Lennox,
Monitoring Officer,
EDDC (East Devon District Council),
Blackdown House,
Border Road
Heathpark Industrial Estate,
Honiton. EX14 1EJ.

Mr Gordon Lennox,

1. In your last letter I note that you do not address the points in the previous letter that are in error and that I am close to answering in complaints to other agencies. Instead you limit yourself to asking for evidence that Mr McCollum was acting as an EDDC Cllr during the Gate to Plate 2019 (G2P). I suggest that you ask your own Health and Safety persons who sent Mr McCollum two copies of the EDDC Risk Assessment for that event organised by EDDC. I will assume that you will not require me to put in a Freedom of Information request for those two emails.

- a) One copy was emailed to EDDC Councillor McCollum.
- b) A second copy was emailed to Mr McCollum's HTC email as Market Manager / Town Development Manager.

Thus Mr McCollum was wearing two hats during that event and picked/chose which one he wore according to the time of day. It is a conflict that you as representative of EDDC interests will also pick and choose? Certainly Mr McCollum kept signs produced and paid for by EDDC relating to the event and those were found in the mess that was behind the Lace Walk toilet block*. I also have photos of the street market that was displaced on the day inclusive of the siting of a Labour Party Gazebo that displaced a 'regular trader' to a pitch at the junction of Silver Street and the High Street. Thus when Mr McCollum was involved with the G2P site he was not acting as market manager but as agent for EDDC and as an EDDC Cllr since the G2P was not held under the auspices of the Honiton Street Market Charter.

2. I also suggest that you ask Cllr McCollum for a copy of his election manifesto that shows him in a high vis tabard, on the HTC Street Market, and stating that people should come to speak to him as a candidate. He has reissued that image. In other words where we HTC Cllrs declare a pecuniary interest when doing our elected role, Mr/Cllr McCollum frequently merges the two. I say pecuniary interest since both roles are waged. I also advise you to read Cllr McCollum's face-book page known as St Pauls Ward. I have some useful screenshots from there.

*3. I enclose a series of MMS texts sent to Mr Darsley before he adjudged me guilty of bullying Mr McCollum before the opening of the Street Market in June. These are relevant to the topics in your

earlier letter. I will be relying on these picture and contiguous text when I act to have Mr Darsley's report removed. I also point out that I sent these images etc to Mr Darsley prior to his issuance of his 'final' report yet he still did not interview Mr Carl Cracknell, Street Market Assistant. I suggest that you look at the images before you answer the above comments and also read the enclosed newspaper article from 2013 that emphasises that since that time Mr McCollum has administered the Market in breach of Health and Safety legislation (1974, 1997 and recent applied in 2013). [Note that I have a number of SMS texts also sent to Mr Darsley and that were for information and Candour purposes.]

- a) Such breaches are subject to Criminal penalty to the employer, HTC as Body Corporate and in particular if a serious injury or death occurred whilst Health and Safety legislation was not observed then the Chair of the Council could be imprisoned.
- b) A breach automatically occurred in March 2019 when Mr Cracknell was employed. That took HTC to six employees and written H&S Risk Assessments are required. As Market Manager / Town Development Manager Mr McCollum must have been aware of his responsibilities and if not then ignorance is no defence. Certainly that responsibility was emphasised in or about October 2019 when Mr Cracknell resigned because of ill treatment by his line manager. The subsequent acts by his full line management – Mr McCollum – Mr Tredwin HTC Town Clerk – HTC Cllr Sheridan Shaw Chair of HTC HR resulted in Mr McCollum buying some wet weather gear but none was in accord with the High vis clothing legislation required of persons working on a highway and brought into effect in 2013. To put it bluntly the entire line management put Mr Cracknell's life at hazard without proper PPE and indeed sited the traffic cones in an area behind the Honiton Masonic Lodge that was unsafe. A safe area was available behind the LACE Walk loos and had been used by Mr McCollum off and on for ten years. As a result of the use of the unsuitable Masonic site the lodge received a rental of £300 that was a direct pecuniary benefit to Mr McCollum's lodge. I note that Mr NcCollum declares his Masonic membership as an EDDC Cllr but of course such declaration is not need as an employee.
- c) You will have realised by now that your referral of me to Mr Darsley has interfered with an employment issue and one that involves pecuniary gain arising from a criminal act. Add to that the effect on the reputation of the current HTC Council and the use that has already been used of Mr Darsley's final report and it is obvious that you, as Monitoring Officer and Deputy Returning Officer have committed acts that have given preference to candidates in the by elections for HTC that you yourself have administered.
- d) The import of Mr Cracknell is that he became the sixth employee of HTC. Consequently written H&S Risk Assessments are required of the employer. When I was given the job of Risk Appraisal (not Assessment) of the SARS-CoV-2 directives for the HTC Office I requested the Risk Assessment. There was not one written since 2008. Likewise when asked to do the same for the Street Market it was with horror I found that MR/Cllr McCollum had not written anything. In subsequent correspondence with EDDC EH officer Mr Harding, who corresponded with Mr McCollum, I made it plain that I, as a member of the at-risk Body Corporate, acted in the interest of that body and thereby acted in defence of the H&S of Mr Cracknell as is/was my duty. I remind you that the entire line management of Mr Cracknell was aware of the situation, that nothing had

been done and that Mr McCollum was central to this breach of Statute law. I note that Mr/Cllr McCollum signed off with stress in the afternoon of 3 June 2020. At or about 09.00 on 2 June Mr McCollum received an email from Mr Harding. Mr McCollum immediately forwarded that email to HTC Chair Cllr Zarczynski. In that email Mr Harding demanded **ALL** Risk assessments for HTC and inclusive of SARS-CoV-2 risk appraisals. Mr Harding emphasised the word all as shown in bold. Thus prior to the onset of stress, EDDC employee Mr Harding put Mr McCollum in a position that meant his failure to observe H&S Statute would be exposed.

- e) I note that subsequently Mr McCollum took offence at my stating that he had done no work. He described that as bullying. In addition he claimed that I shouted at him on two occasions beginning 29 May yet Mr Darsley found that those claims were untrue. I have not spoken to Mr McCollum for well over two years prior to those events on the High Street concerning the reopening of the Market and as I emphasise Mr McCollum's claims were dismissed by Mr Darsley yet he found me guilty on hearsay evidence only.
- f) In your letter you skate around the topic of 'Independent Investigators' reports. You will be aware that these are taken as completely accurate by the Courts as was stated in the Greenslade JR Applications. This is confirmed by Barrister opinion from Cornerstone Chambers. Likewise you will be aware that you did not submit your email correspondence with EDDC members that occurred after my Standards Hearing that effectively dismissed the Darsley report as was demonstrated at the HEDDC Hearing. You have previously written that you submitted all paperwork as required by CPR 31 to the JR. I am sorry to have to inform you that CPR 31 does not apply to JRs. Instead a Duty of Candour that is even more stringent than CPR 31 replaces it. As a consequence of my previous experience with you and EDDC I will be challenging the current Darsley report and the implications that I be involved in a cover-up of a breach of H&S legislation by an entire line management. You must know me by now – I will defend the interests of the lowest in a management chain, in this case Mr Carl Cracknell.
- g) You mention a failure by my previous solicitors. You may recall a meeting with me and Cllr Zarczynski, at which a claim against my former solicitors was in progress. Your comment we "good luck with that" in a disbelieving, dismissive tone. You got it wrong. After two hearings before a Deputy High Court Judge I am content with a settlement. I learnt a lot from that and that is why I will pursue what I believe is a vindictive assessment of me by Mr Darsley given that he refused point blank to interview Mr Cracknell who is central to the current situation of H&S within HTC.

With regard to your dismissal of my previous complaints I just answer the first. It would be repetitious otherwise. My paragraph 1. I cannot see how this topic can be construed as a private matter. *CoC 1.3(a). you must act solely in the public interest.* Cllr McCollum has to declare any topic that confers a pecuniary interest when attending EDDC meetings and by extension any action that confers pecuniary interest when using EDDC facilities (or not as may be when Cllr McCollum was breaching Health and Safety law) must fall into your remit. I remind you of the attention paid to former EDDC Cllr Brown (now deceased) who did nothing unlawful, declared his interests but was pursued by 'the Powers That Be'. In

this case however there is overwhelming evidence that an EDDC Cllr will bring EDDC into disrepute when the H&S data is published. I can assure you that it will see the light of day since it is in the interests of Transparency and Justice.

Yours sincerely

John Taylor.

Mr Gordon Lennox, I copy this reply to your response to my complaint to Mr Williams. I will be pursuing this matter with other avenues that will have a linked interest but to whom I will request confidentiality. I will not use the 'confidentiality Socratic argument' employed by Mr Darsley in my text exchanges. Mr Darsley's use of confidentiality to disguise the use of Socratic argument (not to be confused with Socratic teaching techniques) that went out decades ago.



Number 3

[The comments below in text boxes are those that accompanied the MMS pictures to Mr Darsley prior to his draft assessment.]

Tuesday 15 Sept, 09.35 hrs. Mr Darsley, I have no way of reaching you save by text. May I send you a few MMS texts? Yes please do.

Mr Darsley, This picture (here No. 6) of the storage behind the Lace Walk toilets was taken 4 July. It obviously is super organised. I did not take earlier pictures of this area. Earlier pics are of the white painted area in the background.



Number 4



Number 5

Mr Darsley, this pic (here No. 7) and the next three (here Nos. 8, 9, 16) were taken 21 June. They show the state of the area at the far end of the last picture (here 6). Note the old tree trunk, established weeds, and the iron frame of the only market canopy owned and therefore stored by HTC and thus Mr McCollum since 2012?

[I apologise for the order of these photos in this document. This arises from difficulties in recovering some pictures from the texts but the original texts are available.]



Number 6



Mr Darsley this (here No.3) and the next two pics (here Nos. 4 and 2) show Carl after we cleaned the area (a Sunday) and illustrates how large and safe a working area the Lace Walk area is. In fact I intend some useful expansion of facilities to enhance the Emergency Response Equipment for EDDC/DCC.

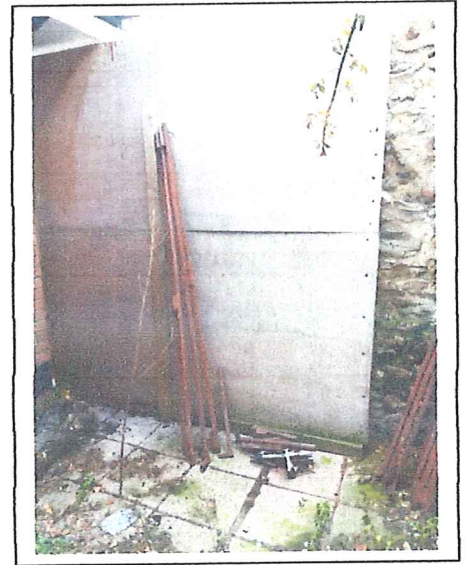


Photos of storage areas for road cones used for Honiton Street Market. Also photos of PPE equipment provided by HTC Councillor Taylor at his personal expense. Page 1 of 5. Not all pages have been used.

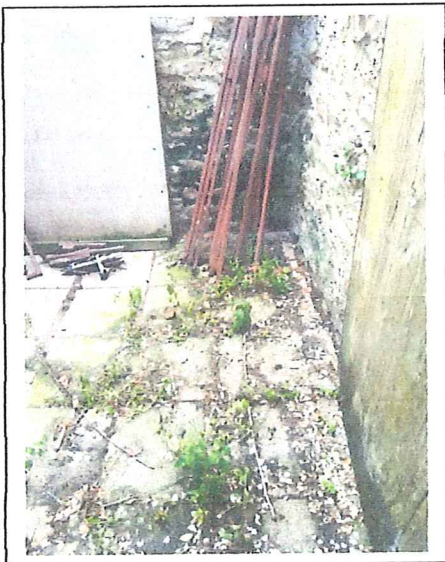
Number 7



Number 8



Number 9



Number 10



Mr Darsley, we come to the original store behind Cllr McCollum's Masonic Lodge. Note the angle of the ground (Nos. 10-14), the original sack truck (No. 11) that McCollum, Tredwin and Sheridan Shaw forced Carl to use until November 2019 when, following his (Carl's) resignation they belatedly gave him a contract backdated to 9 March, the nice new gate (Nos. 11-14) that the Masons found money for but nothing for making safe storage for cones) and of course the angle of the ground. Also please note that here is no lighting so it is pitch black in the winter when the market kicks off at 06.00. 1974 Act.

Number 11



Number 12



For info, the cones were stored along the wall where one can see bare ground. In winter this place is mud, the Masons drive cars in.

Mr Darsley, I have lots more pics. I have hard copy of the minutes/advice to HTC, of Nov/Dec 2019 where Tredwin and Sheridan Shaw advised that there was no alternative to the Masonic scam. I have copies of the full website of the Chamber of Commerce for April 2020. I have a copy of Carl's contract, issued in Nov 2019 and which has a draft watermark throughout. I can prove that Mr McCollum is EDDC Cllr for Honiton St Paul's ward and that Carl is a resident of that ward.

Photos of storage areas for road cones used for Honiton Street Market. Also photos of PPE equipment provided by HTC Councillor Taylor at his personal expense. Page 2 of 5. Not all pages have been used.

Number 13



Finally I refer you to Mrs Justice Andrews decision in Greenslade v DCC and in particular paragraph eight. I will not make the mistake my lawyers made last time and I will ensure that all evidence is as can be seen, not edited by an EDDC Standards Hearing.

Number 14



Number 15

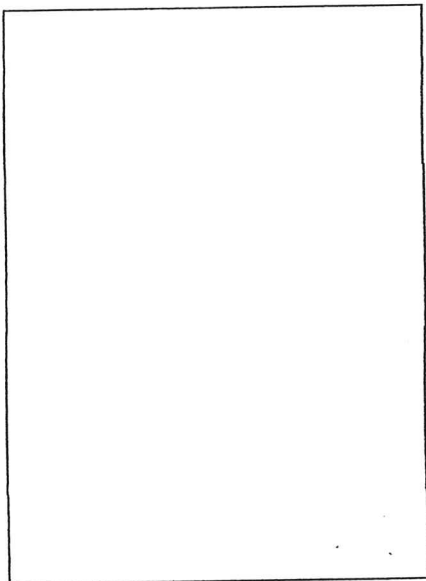


I forgot, I send you a picture (*this is one of several*) of Carl in his wet weather gear that I have funded (I have funded most things for the past months since I have been given responsibility for his duties). In other words McCollum, Tredwin and Sheridan Shaw failed in toto as a line management even to provide basic work wear. This will run and run in any tribunal or court action. It is appalling. And it includes the actions of an EDDC Cllr towards a Ward member (Carl lives in McCollum's Ward). I am disgusted. But only on the basis of evidence of course.

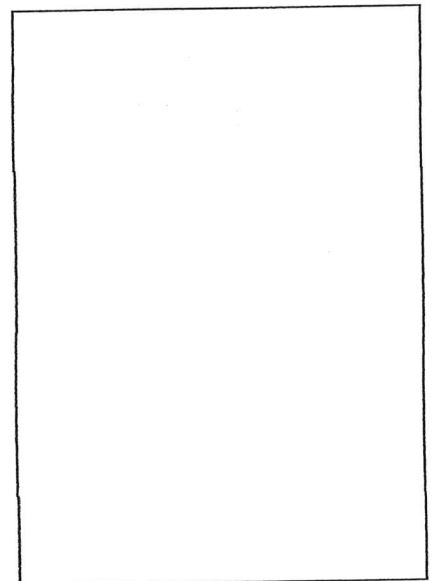
Number 16



Number 17



Number 18



Photos of storage areas for road cones used for Honiton Street Market. Also photos of PPE equipment provided by HTC Councillor Taylor at his personal expense. Page 3 of 5. Not all pages have been used.

Committee: FULL COUNCIL

Date: 11 November 2019

Title: High Street Storage

Purpose of Report

To inform members of a request for storage to be paid for market materials that are kept at the rear of the Masonic Hall

Recommendation:

Honiton Town Council **RESOLVES** to pay an annual sum of £300 per year for the storage of the cones and other market equipment at the rear of the Masonic Lodge.

Report:

1. The cones and trolley used in the setting out of the Market have been stored for a number of years at the rear of the Masonic Lodge. This has been provided free of charge in return for which the Town Development Manager would assist in his own time with the cleaning of the Hall.
2. As a result of the time pressures being applied to the TDM from a number of areas he has not been able to commit to assist in this way and as such the Lodge now finds itself in the position of having to pay a cleaner.
3. There has as a result of the increased use of the gates been an increase in wear and tear that has contributed to the need to replace the gates recently.
4. In the past the council has paid £50 for storage that was in excess of the amount being requested by the Lodge for storage now.
5. The only alternative place for the Market equipment to be stored at present would be down here in the Beehive and as such this is not a practical option to consider.
6. Any charges would apply from the 1 January 2020.
7. Honiton Town Council **RESOLVES** to pay an annual sum of £300 per year for the storage of the cones and other market equipment at the rear of the Masonic Lodge.

Mark Tredwin
Town clerk
November 2019

Mms. W. H. H. H.

19/1/987
High
St
Storage

Resolved unan. to pay an annual
sum of £300 per year
for the storage of cones &
other market equipment at
the rear of the
masonic lodge

Proposed by JFM Seconded by
D S-S

Agenda No 14 - High St Storage



(no subject)

1 message

Philip Carrigan <philip.carrigan@gmail.com>
Draft

Mon, 19 Oct 2020 at 12:03

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Street market to hit budget

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PUBLISHED: 13:00 25 January 2013 [Katy Griffin](#)

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Honiton's street market holds its own despite adverse weather.
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Honiton Street Market has held its own despite the adverse weather and will come in on budget, the town council has been assured.

Councillor Les Bayliss told a meeting last week that the market had generated £500 less revenue than the previous year.

He said: "The budget, so far, for the market is running £500 down compared to the same period last year which may be due to the adverse rain.

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“This is a relatively small figure in terms of the budget itself and it is expected that we will still meet the budget by April.”

He told the meeting that there was still £5,000 in the reserves.

The Street Market Company recently held its inaugural meeting during which market manager Tony McCollum said that the market has continued to hold its own during these difficult times.

He said he had held back on spending money on repairs, maintenance, health and safety equipment and proposals of other purchases to improve the market to ensure it came in on budget.

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Honiton Community Theatre Dick Whittington at The Beehive, Honiton - 18th to 22nd February

The Christmas decorations have long been put away, 'Dry Veganuary' is kicking in, and only the ducks seem happy with the weather. All the signs point to one thing: it's time for pantomime!

Honiton Community Theatre Company's annual panto hits The Beehive this February. This year, the tale of Dick Whittington provides the backdrop for a splendid evening of mayhem, mess and a bloke in a dress.

Unlike many traditional panto plots, this one is rooted in fact. The real Richard Whittington (1350 - 1423) was a Gloucestershire-born politician and merchant who rose to the rank of Lord Mayor of London four times. His story passed into folklore, then became the subject of several popular ballads and plays over the centuries.

The pantomime version began to evolve in the early 1800s into the raggle-taggle tale we know and love today: there's a cat, London's Bow bells, a journey from rags to riches, a Rat King, a perilous sea voyage, an evil witch and a funky sultan complete with a large harem of 'followers'. At The Beehive there'll also be plenty of chasing about and cheesy jokes, audience participation and jumping production numbers, a cracking live band, silliness, sopiness and a happy ending.

There are faces both familiar and new in this year's cast: Hannah Mountain plays Dick, and Sarah Pottinger his love interest, Alice (Sarah is doubly busy as she is also the choreographer.) Tina Paveley is Evil Esmerelda, who is in league with King Rat, played by Josie Denning. HCTC newcomers Mark Usher and James Alsop play Alderman Fitzwarren and the Sultan respectively, while Andy Pottinger, Jaron Bonetta, Lou Pottinger and Sally Cregan also feature. And the bloke in the dress? None other than Warrant Officer of the Band of the Salamanca Rifles and Bugles, Richard Cregan.

Produced by Lisa Sutton and directed by Shaun Bonetta, Dick Whittington is guaranteed to light up The Beehive from Tuesday 18th to Saturday 22nd February. Book now before seats are sold out.



HONITON ST. PAUL'S WARD Drop-In Surgery

E.D.D.C Councillor Tony McCollum will be holding a drop-in surgery at
The Beehive, Dowell Street, Honiton EX15 1LZ

From 5pm to 7pm on The Last Friday Of Each Month

OR

By Appointment Monday To Friday At
E.D.D.C. Offices, Blackdown House,
Border Road, Heathpark Estate, EX14 1EJ

Contact Details:

Tel: 07592 061334

E-mail: stpaulsward@gmail.com

Facebook: [@stpaulswardhoniton](https://www.facebook.com/stpaulswardhoniton)



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You See Me On The High Street**

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FEBRUARY 2020

- 69 -

The glutathione transferase activity and tissue distribution of a cloned M_r28K protective antigen of *Schistosoma mansoni*

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Cancer Research Campaign Molecular Toxicology Research Group, Department of Biochemistry, The Middlesex Hospital Medical School, London W1P 6DB, UK, ¹Transgene SA, 11 Rue de Molsheim, 67082 Strasbourg Cedex, France and ²Centre d'Immunologie et de Biologie Parasitaire, Unité Mixte INSERM 167 CNRS 624, Institut Pasteur de Lille, 1 Rue du Pr. Calmette, 59019 Lille Cedex, France

Communicated by J.-P. Lecocq

A protective M_r28K antigen of *Schistosoma mansoni*, expressed from its cDNA, has been purified in a single step and shown to possess glutathione (GSH) transferase activity as predicted from sequence homologies with two mammalian GSH transferase multigene families. It is notable for its high 1-chloro-2,4-dinitrobenzene GSH transferase and linoleic acid hydroperoxide GSH peroxidase activities. The major GSH transferase of *S. mansoni* has been purified and its subunit is identical to this M_r28K antigen by criteria of M_r, immunochemistry, substrate specificity and peptide sequence analysis. In the parasite, the antigen is present in the tegument, protonophoridial cells and subtegumental parenchymal cells. No significant immunological cross-reactivity between the *S. mansoni* and mammalian (human and rat) GSH transferases was observed.

Key words: GSH transferase/protective antigen/*Schistosoma mansoni*/structural relationships/tissue distribution

Introduction

Parasitism by schistosomes results in chronic and debilitating disease (Schistosomiasis, e.g. Bilharzia) which affects 200 million people throughout the world and according to WHO estimation is responsible for 800 000 deaths per year. Immunization of human populations against this common infection would represent a major advance for public health in many developing countries.

Recent and substantial progress has been made in the identification and biosynthesis of protective antigens of schistosomes (Lanar *et al.*, 1986; Smith *et al.*, 1986). The molecular cloning and expression in *Escherichia coli* of the cDNA encoding a M_r28K antigen of *Schistosoma mansoni* has recently been reported and the full sequence of the protein deduced (Balloul *et al.*, 1987a). The recombinant protein has been shown to induce levels of protection similar to that induced by the purified antigen in rats. Significant levels of protection have also been obtained in mice (45%), hamsters (52%) and baboons (up to 80% with a mean of 40%) (Balloul *et al.*, 1987b).

This paper identifies the M_r28K antigen of *S. mansoni* as a subunit of glutathione (GSH) transferase, an enzyme class (EC 2.5.1.18) much studied in mammals. In rat and man a number of dimeric isoenzymes have been identified which fall into at least three non-homologous multigene families comprising classes α , μ and π (Mannervik *et al.*, 1985). In the class α family of the rat three subunits have been characterized by cDNA cloning (Telakowski-Hopkins *et al.*, 1985 and references therein) and at least two others are known to exist; in the class μ family of the rat three subunits (Abramovitz and Listowsky, 1987 and references therein), of at least five, have been cloned; and in the class π group one subunit has been cloned (Pemble *et al.*, 1986 and references therein). Within each family of rat GSH transferases there is amino acid sequence identity of at least 70% and a similar level of conservation of structure occurs between the enzymes of one species and another. For example, comparison of sequences available for human and rat GSH transferases indicate at least 75% homology between human and rat subunits from the same class (Rhoads *et al.*, 1987 and references therein).

In the present paper we show that analysis of the amino acid sequence of the M_r28K antigen, in relation to known sequences of the rat GSH transferases, reveals homologies with both the α and μ families of mammalian GSH transferases. We then demonstrate that the M_r28K antigen produced from cDNA in both *E. coli* and *Saccharomyces cerevisiae* can be purified by GSH Sepharose affinity chromatography and is a GSH transferase which is identical in subunit mol. wt, structure and substrate specificity to the major GSH transferase isoenzyme isolated from homogenates of *S. mansoni*. Immuno-electron microscopical studies which locate the M_r28K antigen in the parasite are described. These results are discussed in relation to the immunochemical basis of antigenicity and structure/function relationships in GSH transferases.

Results

Sequence comparisons of the *S. mansoni* M_r28K antigen and subunits of rat GSH transferases

The *S. mansoni* M_r28K antigen, over much of its length, displays a low level of homology to rat GSH transferases of class α (subunits 1,2) and class μ (subunits 3,4,6) but not to class π (subunit 7). However, high homology to class α or class μ subunits occurs in short regions of the amino acid sequence (Figure 1). Thus the *S. mansoni* antigen, at its amino-terminal, shows substantial homology to the rat GSH transferase class α family whilst further into the protein occur two regions of high homology to the rat GSH transferase class μ family and finally there is a return to homology to the class α family. It is noteworthy that these homologous residues occur at similar positions along the sequences of the mammalian GSH transferase subunits and the M_r28K antigen.

Figure 1. Rat GSH transferase subunits vs *Schistosoma mansoni* antigen

	residue no.	Sequence	Identity (%)
<i>S. mansoni</i> subunit 2	9	Y F D G R G R A E S I R M T L V A A G V	(75%)
	8	Y F D G R G R M E P I R W L L A A A G V	
<i>S. mansoni</i> subunit 3	70	S L A I A R Y M A K K H H M M G E T D E E	(67%)
	73	S N A I M R Y L A R K H H L C G E T E E E	
<i>S. mansoni</i> subunit 3	152	G D K V T L A D	(75%)
	149	G D K V T Y V D	
<i>S. mansoni</i> subunit 2	158	A D L V L I A V I D H V T D L D K G F L	(45%)
	155	A D V Y L V Q V L Y H V E E L D P S A L	

ions of high homology between GSH transferase subunits and the M_r28K antigen of *S. mansoni*. Residue no. relates the first amino acid in this region to its position in the protein. Sequence from Balloul *et al.* (1987a); Telakowski-Hopkins *et al.* (1985); Ding *et al.* (1985).

antigen expressed in *E. coli* and *S. cerevisiae*: purification and characterization

The M_r28K antigen produced from cDNA in *E. coli* and *S. cerevisiae* (G. Loison *et al.*, to be published) was purified on a GSH affinity column. Of the total GSH transferase activity, 98% was recovered in the GSH eluate as a single band of M_r28K on SDS-PAGE (Figure 2). The mol. wt of the recombinant enzyme (~50K) was determined by gel filtration on Sephacryl S-200 and is consistent with a dimeric structure. The substrate specificity of the enzyme is shown in Table I. It is high in 1-chloro-2,4-dinitrobenzene (CDNB) GSH transferase and linoleic acid hydroperoxide GSH peroxidase activities. Despite the presence of sequences with high homology to rat GSH transferase subunits 3 and 4 the antigen possesses negligible catalytic activity for subunits 3 and 4 respectively (see Beale *et al.* 1983). Likewise the antigen is notable in that it cannot catalyze either androst-5-en-3,17-dione which is associated with subunit 1 or cumene hydroperoxide which is associated with both subunits 1 and 2 (see Balloul *et al.*, 1983). Among known rat GSH transferases it most closely resembles GSH transferase 7-7 (see Meyer *et al.* 1983) although it bears no apparent sequence homology to this enzyme.

The antigen expressed from its cDNA in *E. coli*, 60% of material did not bind to the affinity column, had no GSH transferase activity (see Figure 2, lane 5), and was assumed to be in an inappropriate conformation. In contrast, the antigen from the *S. cerevisiae* expression system, 95% of the recombinant product, which comprised 30% of the yeast culture lysate, was purified by GSH affinity chromatography and was active enzyme.

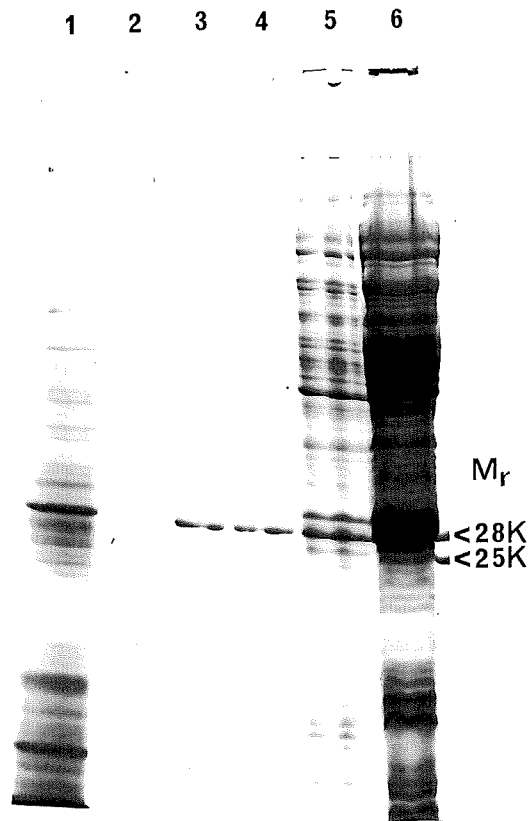


Fig. 2. Purification by affinity chromatography of recombinant M_r28K antigen. SDS-PAGE of proteins from *S. cerevisiae* (lanes 1,2,3) and *E. coli* (lanes 4,5,6). Lanes 1 and 6, total soluble fractions from culture lysates; Lanes 2 and 5, flow through; Lanes 3 and 5, GSH-eluates.

M_r28K antigen expressed in *E. coli* and *S. cerevisiae*: amino acid sequence

The proteins purified from *E. coli* and *S. cerevisiae* each gave

Table I. Enzymic characterization of natural and recombinant GSH transferase of *S.mansoni*

Substrate	Activity ($\mu\text{mol}/\text{min}/\text{mg}$ protein)		
	Source of enzyme		
	<i>S.mansoni</i>	<i>E.coli</i>	<i>S.cerevisiae</i>
1-Chloro-2,4-dinitrobenzene	124	120	130
Linoleate hydroperoxide	5.5	6.3	6.3
Ethacrylic acid	0.8	1.2	1.4
Cumene hydroperoxide	0.4	0.5	0.5
<i>trans</i> -4-Phenyl-3-buten-2-one	0.4	0.3	0.3
1,2-Epoxy-3-(<i>p</i> -nitrophenoxy)propane	<0.5	0.1	<0.5
1,2-Dichloro-4-nitrobenzene	<0.1	0.02	0.02
Androst-5-en-3,17-dione	—	<0.001	—

Inhibitor	I_{50}^a (μM)		
	<i>S.mansoni</i>	<i>E.coli</i>	<i>S.cerevisiae</i>
Haematin	0.35	0.31	—
Lithocholate-3-sulphate	9.5	9.0	—

^a I_{50} s were determined from inhibition curves with 1-chloro-2,4-dinitrobenzene as second substrate.

a single peak on RP-HPLC, with a retention time of 19.9 min. Approximately 30 μg of each preparation was used for sequence analysis which, in both cases, showed an amino terminal residue of alanine and subsequent amino acid sequence consistent with that of the amino terminal of the M_r 28K antigen as deduced from its cDNA (Balloul *et al.*, 1987a). Although the presence of a proportion of N-terminally blocked protein cannot be excluded, the results show that cleavage of the initiating methionine by aminopeptidase had occurred in both expression systems.

The major GSH transferase of *S.mansoni*: purification and characterization

The major GSH transferase of *S.mansoni* has been purified in a two-step process consisting of affinity chromatography on a GSH affinity column followed by anion exchange FPLC (Figure 3a). The purification was monitored by GSH transferase activity towards CDNB. The subunits of this enzyme have a similar mobility to rat GSH transferase subunit 2 (M_r 28K, Beale *et al.*, 1982) on SDS-PAGE (Figure 3a, inset) and the substrate specificity of the enzyme was similar to that of the M_r 28K antigen recombinant protein (see Table I).

Approximately 10% of the total GSH-CDNB conjugating activity of the soluble extract was not adsorbed by the GSH affinity column. This was due to the presence of an isoenzyme which differs from the major GSH transferase in possessing activity towards 1,2-epoxy-3(*p*-nitrophenoxy)propane.

The major GSH transferase of *S.mansoni*: amino acid sequence

The major GSH transferase, on RP-HPLC, gave a single symmetrical peak with the same retention time as the recombinant M_r 28K antigen (19.9 min) and 30 μg of protein from a micro-preparative run was applied to the protein sequencer. No sequence could be assigned but no overall increase in background signal was observed with successive cycles, indicative of a protein with a blocked N-terminal. To obtain sequence information, fragments were produced by partial

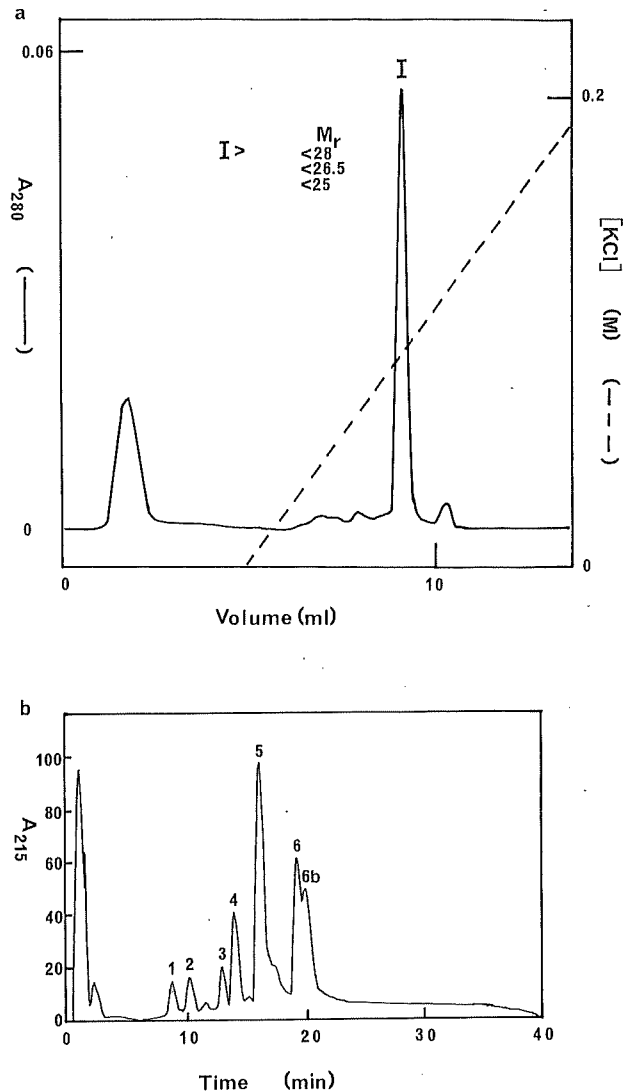


Fig. 3. (a) Purification of GSH transferase *S.m.*1-1 from adult worms. The GSH transferase pool from *S.mansoni* adults was analysed by anion exchange FPLC as described under Materials and methods. The predominant GSH transferase is labelled I. Inset: SDS-PAGE of peak I, arrows show rat GSH transferase subunits 1 (M_r 25K), 3 (M_r 26.5K) and 2 (M_r 28K) (Beale *et al.*, 1983). (b) Analysis of GSH transferase *S.m.*1-1 after treatment with staphylococcal V8 protease. Micro-preparative separation by HPLC of 100 μl of the V8 digest after 2 h at 37°C, at A.U.F.S. of 0.3. The peaks, labelled 1-6, were subjected to sequence analysis (Table II).

digestion with staphylococcal V8 protease. The cleavage products were separated by RP-HPLC into six major peaks (Figure 3b) each of which was analysed by amino acid sequencing (Table II). Peaks 2 and 6 gave single sequences that could be assigned unequivocally to parts of the deduced sequence of the M_r 28K antigen of *S.mansoni* (the shoulder labelled 6b had the same retention time as the starting material and probably represents uncleaved, and therefore N-terminal blocked, GSH transferase). The remaining four gave multiple analyses, but all the amino acid residues with the exception of some arising from the analysis of peak 5 could be assigned to peptide sequences contained within the M_r 28K antigen. All these peptides would result from cleavage of the antigen at the C-terminus of glutamic acid

Table II. Sequences of peptides derived from staphylococcal V8 protease digest of *S.mansoni* GSH transferase

		Position
PEAK 1	H I K V I Y F D G R G R A	5-17
	S L - - S - - K L A V	142-152
PEAK 2	S L A I A R Y M A K K H	71-82
PEAK 3	N L L A S S P R L A K Y L S N	191-205
	Y - S V E K L I G Q A E D V D	92-106
PEAK 4	R I S F Q D W P K I K P I	35-46
	D E R I S F Q D W P - I K	33-45
	I L N G K V P V L L N M	127-138
	S - - M - - V A A G V D Y	19-31
PEAK 5	V I L P N N D R H Q I T D - - N G H	(protease) ^a
	S I R M T L V A A G V D Y E - - R I S F	19-38
PEAK 6	I L N G K V P V L L	127-136

The single-letter code is used for the amino acids. All peaks except 2 and 6 yielded multiple sequences. Assignments to the M_r28K antigen sequence of Balloul *et al.* (1987a) are listed (position). N-terminal yields were between 200 and 300 pmoles for each main sequence. Repetitive yields were less than 85% which is indicative of some washing out of peptide material during the run and which limited reliable assignments beyond 12 to 15 residues. Peptides are listed according to N-terminal yield although the relative quantities sometimes 'crossed over' during a run so that later residues were not necessarily in quantitative order. ^aV8 staphylococcal protease N-terminal sequence.

residues which is the principal site of cleavage of staphylococcal V8 protease under the conditions used here. The anomalous residues in the analysis of peak 5 were derived from the N-terminal of the V8 protease (Drapeau, 1978). In total, therefore, peptides which are identical to parts of the M_r28K antigen and which account for 48% of its primary structure, have been sequenced.

Nomenclature

Since the major *S.mansoni* GSH transferase is identical to the recombinant enzyme in substrate and inhibitor specificity, in its subunit retention time on RP-HPLC, in the apparent mol. wt of its subunit on SDS-PAGE, and was cleaved by V8 protease to peptides with sequences identical to regions within the primary structure of the recombinant enzyme, it is presumed that the native enzyme is a homodimer of subunit primary structure identical to the recombinant enzyme. On this basis it has been named GSH transferase *S.m.1-1*, according to the rules of nomenclature of Jakoby *et al.* (1984).

Western blot analysis of GSH transferase *S.m.1-1*, the M_r28K antigen of *S.mansoni* and GSH transferase from mammalian hosts

GSH transferase *S.m.1-1* isolated from a crude homogenate of adult worms by affinity and adsorption chromatography, was separated by SDS-PAGE (see Figure 3a, inset), blotted onto nitrocellulose sheet and incubated with an antibody to M_r28K antigen expressed in *E.coli* (Figure 4). The enzyme is recognized by the antibody (Figure 4a) showing that GSH transferase *S.m.1-1* and the M_r28K antigen share immunological cross-reactivity.

Purified GSH transferase subunits 1,2,3 and 4 from the rat, and α , μ and π from the human were analysed on SDS-PAGE (Figure 4b) and then blotted onto nitrocellulose sheet. The blot was incubated first with antibody raised to the M_r28K antigen expressed in *E.coli*. No cross-reaction was observed (Figure 4c) showing that the sequences in the above mammalian GSH transferases and homologous with sequences in the M_r28K antigen (see Figure 1) are not involved in induction of this antibody. The blot was incubated subsequently with a pool of rabbit antisera raised to rat GSH transferase subunits 1/2 and 3/4 (Figure 4d) which shows that the blotted enzymes were recognized by anti-GSH

transferase antibodies and revealed cross-reactivity with purified human GSH transferases α and μ . In a similar experiment, there was no cross-reaction between the pool of rabbit antisera raised to rat GSH transferase subunits 1/2 and 3/4 and proteins in homogenates of *S.mansoni*.

These results were in agreement with immunogold electron microscopy carried out on sections of rat liver. Antibody reactivity was seen with rabbit polyclonal antibodies to either rat GSH transferase subunits 1/2 or subunits 3/4 while no reactivity was seen with antibody (Balloul *et al.*, 1987a) to the M_r28K recombinant fusion protein.

Distribution of the M_r28K antigen in the tissues of *S.mansoni*

Immunogold electron microscopy was carried out on sections from both adult schistosomes and schistosomula, and the results are shown in Figure 5. Antibodies to M_r28K isolated from the parasite and to a M_r28K recombinant fusion protein (Balloul *et al.*, 1987a) were used. Plates A to D, G and H illustrate results obtained with the former antibody while plates E and F were obtained by use of the latter.

In plate A gold particles are seen to be densely distributed over excretory epithelial cells but absent from the flame cell. Plates B and C show the presence of gold particles in both the tegument and subtegumentary parenchymal cell extensions and plate D shows an interdigitation between a parenchymal cell and a caecal epithelial cell illustrating the presence of gold particles in the former, but their absence in the latter. Plates G and H confirm the presence of antigen in the tegument and associated parenchymal cell extensions. Plates E and F concern the schistosomulum and show gold particles not only in the tegument but also over granules of the head gland from which tegumental components may be derived. Careful analysis of other tissues of the parasite such as the digestive tract, reproductive organs or muscles has shown no evidence of labelling.

Discussion

The data presented here prove that the principle GSH transferase of *S.mansoni* (GSH transferase *S.m.1-1*) is a homodimer and its subunit is identical with a protein charac-

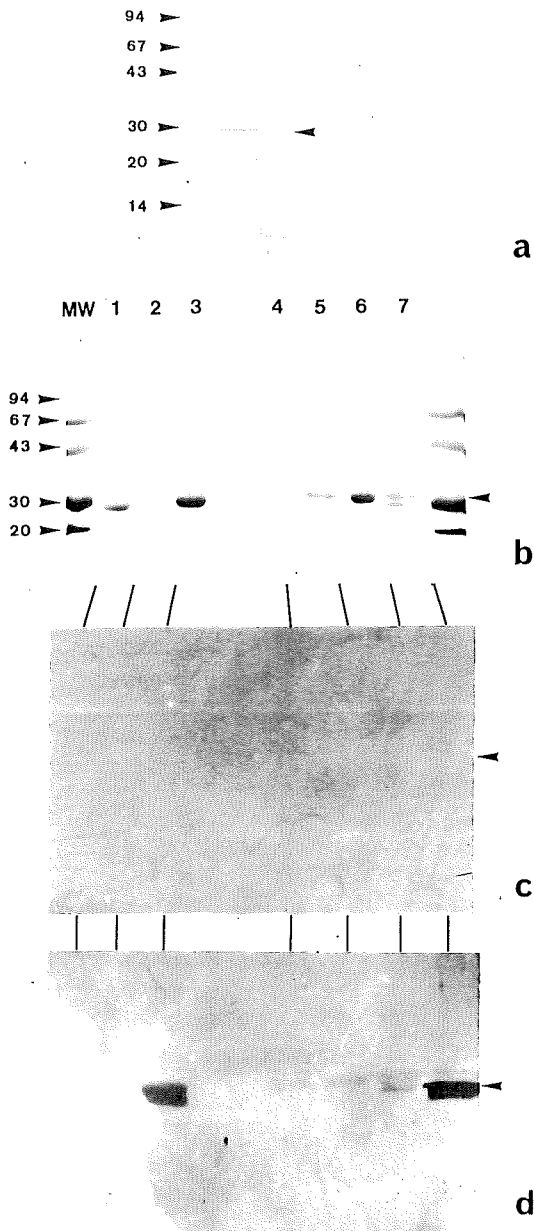


Fig. 4. Analysis of possible shared epitopes between GSH transferase from *S. mansoni* and GSH transferase from rat and man. (a) GSH transferase S.m.1-1 (see Fig.3a) was analysed by SDS-PAGE, transferred onto nitrocellulose sheet and incubated with antibody against recombinant M_r28K antigen. Immune complexes were revealed by subsequent incubation with an anti-rat IgG rabbit serum labelled with horseradish peroxidase. (b) GSH transferase subunits from: 1. human GSH transferase π ; 2. human GSH transferase μ ; 3. human GSH transferase α ; 4. rat GSH transferase 4-4; 5. rat GSH transferase 3-3; 6. rat GSH transferase 2-2; 7. rat GSH transferase 1-2. (c) Reaction between rat anti-recombinant M_r28K antigen serum with rat and human GSH transferase fixed onto nitrocellulose and ordered as in (b). (d) Reaction of pooled anti-rat GSH transferase (subunits 3/4 and subunits 1/2) rabbit sera with rat and human GSH transferases on blot (c). Human GSH transferases were purified as described in Ostlund Farrants *et al.* (1987).

terized previously as an antigen of M_r28K which induces host immune protection to re-infection by the parasite (Balloul *et al.*, 1987a). The purity of the GSH transferase

was confirmed by RP-HPLC and by SDS-PAGE, which showed a single component of M_r28K (Figure 3). This protein was shown to be blocked at the N-terminus, in common with the M_r28K antigen reported by Balloul *et al.* (1987a). After the enzyme was digested with staphylococcal V8 protease, amino acid sequences of peptides were obtained which were identical with sequences in the M_r28K antigen and accounted for over 48% of primary structure. Purified M_r28K antigen, expressed from its cDNA, possessed GSH transferase and GSH peroxidase activity similar to GSH transferase S.m.1-1.

The M_r28K antigen, over much of its length, has a low level of homology to subunits of mammalian class α and class μ GSH transferases although it is best described as a mosaic of short regions which have high homology to one or other of the multigene families (Figure 1). An overall homology to mammalian class μ GSH transferases has been reported for an M_r26K antigen of *Schistosoma japonicum* (Smith *et al.*, 1986) although we note that this antigen also contains a mosaic of sequences homologous not only to the rat subunit 3/4/6 multigene family but also to the subunit 1/2 and 7 multigene families and again these homologous areas all occur at similar positions in the proteins (J. Taylor and S. Pemble, unpublished). At first sight these mosaics of sequences characteristic of two or more non-homologous multigene families, suggest that both antigens are the products of genes close to a primaevial precursor of rat GSH transferases. This is unlikely however, since there is no strong homology between the GSH transferases of *S. mansoni* and *S. japonicum*, and so the possibility arises that the parasites gain some advantage from imitating structures of the host's GSH transferases. Prediction of the antigenicity of the M_r28K molecule by computer analysis and confirmation by the synthesis of peptides indicate that the major epitopes of the protein are created, as expected, only in those regions which show no significant homology with rat and human GSH transferases (Balloul *et al.*, 1987a and unpublished). The existence of significant homologies between *S. mansoni* and vertebrate GSH transferases might provide an epitope capable of induction of humoral anaphylactic response in the course of vaccination against *S. mansoni* and result in auto-immune disease. In this study however, no evidence has been obtained, either by immunoblotting (Figure 4) or by immuno-electron microscopy, that significant cross-reactivity occurs, which incidentally provides supporting evidence that the immunogenic regions of the schistosome antigen are not localized in the conserved regions of the GSH transferases.

Functionally, GSH transferase S.m.1-1 has enzymic roles (Table I) which are similar to those of members of the mammalian supergene family (for review see Ketterer *et al.*, 1986, 1987) and which may aid parasite survival. For example, cell mediated immune attack on the schistosome is associated with the release of highly reactive oxygen species capable of initiating lipid peroxidation and the production of membrane decomposition products including cytotoxic hydroxyalkenals. GSH transferase S.m.1-1, having both fatty acid hydroperoxide-GSH peroxidase and GSH transferase activities, may neutralize immune attack by inhibiting lipid peroxidation and scavenging any hydroxyalkenals produced.

Immuno-electron microscope studies (Figure 5) show that in the adult, GSH transferase S.m.1-1 is present both in the tegument and its extensions into the parenchyma and the ex-

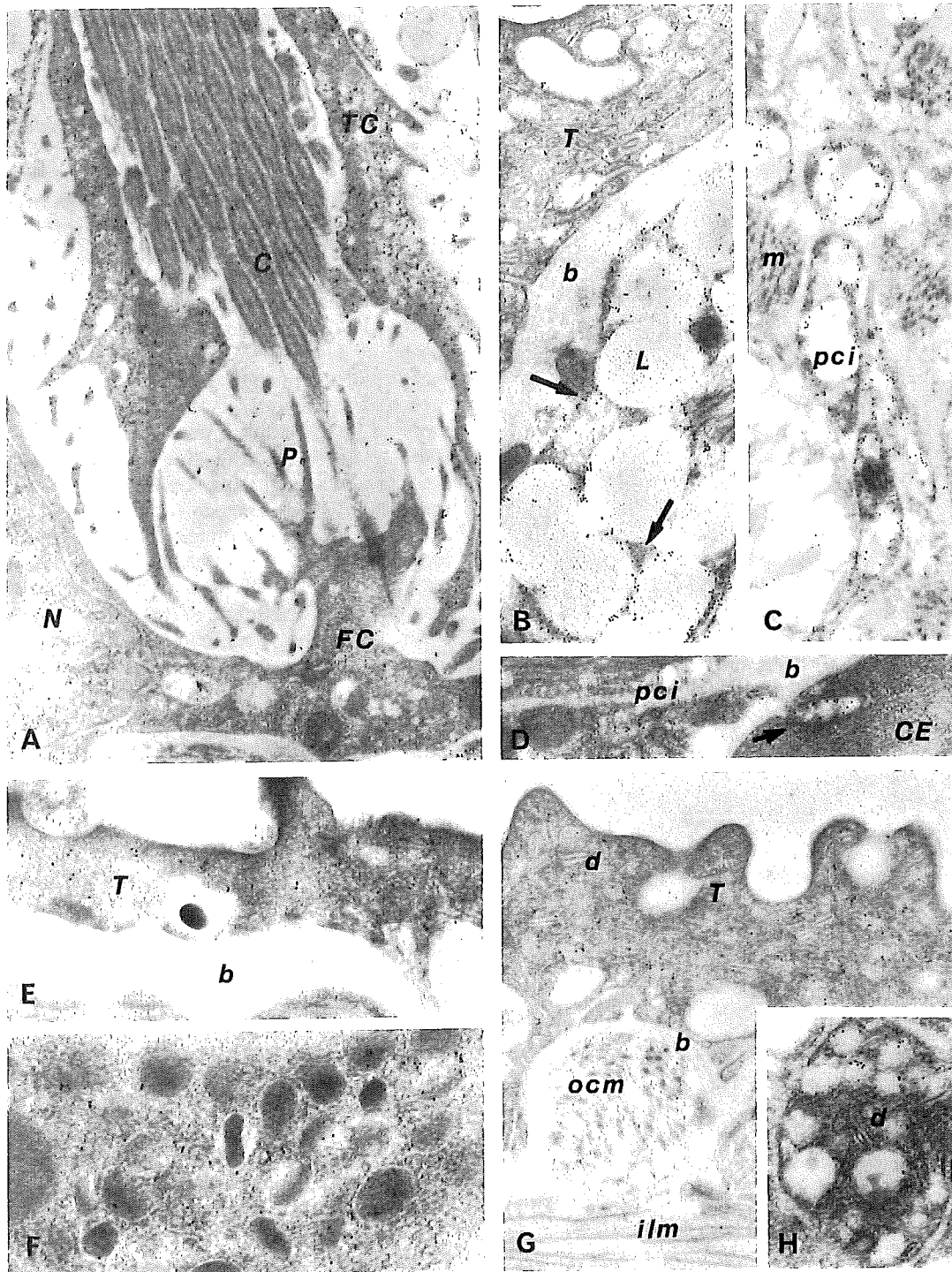


Fig. 5. Distribution of the 28K antigen in *S.mansoni* adult worms (A–D, G and H, and schistosomula (E and F) as observed by indirect immuno-electron microscopical labelling. Lowicryl sections of fixed parasites were labelled with anti-M₂28K antigen rabbit serum (A–F) and anti-M₂28K recombinant fusion protein (Balloul *et al.*, 1987a) rat serum (G–H) followed by appropriate anti-rabbit IgG and anti-rat IgG-colloidal gold. (A) In the protonephridial region, gold particles are densely distributed over the cytoplasmic phase of the excretory tubule cell (TC). Gold particles are absent from the apical flame cell body (FC), processes (P) from the chamber wall and tuft of cilia forming the flame (C). N, Nucleus. × 21 000. (B) In the dorsal tubercle region of male *S.mansoni*, gold particles are mostly associated with cytoplasmic areas (arrows) in close vicinity to the lipid droplets (L). b, basement lamina. × 31 000. (C) Anti-M₂28K antigen is densely distributed throughout the cytoplasm of parenchymal cell interdigitations (pci). m, body musculature. × 23 000. (D) Closely associated with the parenchymal side of the caecal epithelium (CE), a discrete paddy-form area (arrow) of the end of a parenchyma cell interdigitation (pci) labelled with gold particles. b, basement lamina. × 34 000. (E) The label for anti-M₂28K antigen is also localized on the tegument (T) of schistosomulum *S.mansoni*. b, basement lamina. × 39 000. (F) Using the anti-M₂28K antigen fusion protein rat serum, cross-reactivity can equally be detected over the granules of the head gland of schistosomulum. × 50 000. (G) Anti-M₂28K antigen fusion protein is fairly uniformly distributed throughout the tegument of adult worm (T). Gold particles are generally associated with discoid granules (d). b, basement lamina; ocm, outer, circular cortical muscle; ilm, inner, longitudinal cortical muscle. × 33 000. (H) In the tegumentary cells observed below the peripheral musculature, gold particles associated with discoid granules (d) are present over the cytoplasm extensions joining the tegument. × 37 000.

cretory epithelial cells. It is, however, absent from the caecal epithelium and the flame cells. In the schistosomulum, which is a stage that is sensitive to the immune response, the antigen is also found in the tegument and associated structures. Although in mammals GSH transferases are regarded as intracellular proteins, since GSH transferase S.m.1-1 raises an immune response in the host some of the enzyme must be accessible to the immune system. In previous work the M_r28K antigen in the intact parasite larva has proved accessible to radio-iodine labelling and is presumably at the tegument surface (Balloul *et al.*, 1985). It might be carried to the tegumental surface in the course of membrane formation since in schistosomes the structure of the multilaminar tegumental membrane is such that its outer surface has its origins in the cytoplasmic leaflet of the membrane bilayer (Torpier *et al.*, 1977, 1979; McLaren, 1980). Alternatively it might become exposed to the host immune system by incidental leakage from a tegumental surface which is by nature fragile and is constantly being shed into the environment of the parasite (Kusel and Mackenzie, 1975; Senft *et al.*, 1986).

Materials and methods

Structural analyses by computer

Sequence comparisons were undertaken using a MicroGenie Sequence Analysis Program (Queen and Korn, 1984) obtained from Beckman Instruments (Palo Alto, California). The algorithm locates regions >40 residues in length and containing at least 40% identity.

Purification of recombinant M_r28K antigen produced from cDNA

An extract from *E. coli* prepared by sonication in PBS and centrifuged at 20 000 *g*_{av} for 10 min was applied directly to a 7 ml S-linked GSH-agarose affinity column (Sigma Chemical Co. Ltd, Poole, UK, Catalogue No. G4510) and the GSH transferase fraction (48 mg, M_r28K) was eluted with 7 mM GSH, 50 mM Tris-NaOH, pH 9.6 (Vander Jagt *et al.*, 1985; Ostlund Farrants *et al.*, 1987).

The activity of this recombinant GSH transferase from *E. coli* was tested against the following substrates: 1-chloro-2,4-dinitrobenzene, linoleate hydroperoxide, ethacrynic acid, cumene hydroperoxide, *trans*-4-phenyl-3-buten-2-one, 1,2-epoxy-3(*p*-nitrophenoxy) propane, 1,2-dichloronitrobenzene and androst-5-en-3,17-dione (Meyer *et al.*, 1985). In addition inhibition by the ligands haematin and lithocholate-3-sulphate was determined. Protein produced in *S. cerevisiae* (27 mg, M_r28K) was submitted to a similar procedure. The mol. wt of the recombinant enzyme was determined by gel filtration on Sephacryl S-200 using Soy bean trypsin inhibitor, ovalbumin and BSA as standards.

Purification of the major GSH transferase from *S. mansoni*

A soluble fraction from 1 g of adult worms, collected from infected hamsters and homogenized in PBS (Balloul *et al.*, 1985), was stored at -70°C. It was thawed, diluted 2-fold into 1.15% KCl, 0.5 mM phenyl methyl sulphonyl fluoride, 1 mM EDTA, 10 mM potassium phosphate, pH 7.0 and centrifuged at 30 000 *g* for 15 min. The supernatant was applied to a 2.5 ml S-linked GSH-agarose affinity column and the bound GSH transferase pool was eluted as described above. During fractionation the temperature was maintained at 0-4°C. The major GSH transferase was then separated from minor GSH transferases by anion exchange FPLC using a Mono Q 5/5 column (Pharmacia, Uppsala, Sweden) in 0.1 mM dithiothreitol, 20 mM diaminopropane-HCl, pH 8.55 eluting with a gradient of KCl at room temperature (Figure 3a).

Reverse-phase high pressure liquid chromatography (RP-HPLC)

Protein and polypeptide fragments from the major *S. mansoni* GSH transferase were separated by RP-HPLC (Gilson, Madison, WI, USA) using a 2 mm × 30 mm Aquapore RP-300 column (Applied Biosystems, California, USA). The solvents were 0.5% trifluoroacetic acid (TFA) in water (solvent A) and 0.05% TFA in acetonitrile (solvent B). Gradients of 10-70% solvent B were run in 30 min at a flow rate of 0.2 ml/min. Protein and polypeptide fragments were detected at 215 nm.

Staphylococcal protease digestion

The principal *S. mansoni* GSH transferase was digested with staphylococcal

V8 protease. The major GSH transferase in 200 mM sodium phosphate, 10 mM CaCl₂ was adjusted to pH 8.0 by the addition of 10 μl of 1 M Tris-base. 5 μl of 1 mg/ml solution of staphylococcal strain V8 protease (Sigma, Poole, UK) was added to a 200 μl aliquot (~60 μg) of the enzyme and the final solution incubated at 27°C. Proteolysis was monitored by analytical RP-HPLC at 30 min intervals. Although this analysis indicated that starting material was not completely cleaved by 2 h, a preparative run was made at this time in order to minimize the number of fragments generated for sequence analysis.

Amino acid sequencing

An Applied Biosystems 470A gas-phase sequencer was used with the 120A on-line PTH analyser (California, USA). Sample disks were loaded with 3 mg polybrene (Applied Biosystems) prior to peptide application.

Western blotting

GSH transferase preparations were mixed with an equal volume of 2 × sample buffer (3% SDS, 5% 2-mercaptoethanol, 62.5 mM Tris-HCl, pH 6.8) and boiled for three minutes. Samples were separated on 13% SDS-PAGE slab gels and then transferred onto nitrocellulose paper (Towbin *et al.*, 1979). Protein blots were probed with either anti-recombinant M_r28K rat serum or anti-rat GSH transferase. Bound antibodies were detected with antibodies conjugated with horseradish peroxidase (Pasteur Production, France).

Expression systems

The cDNA insert encoding the M_r28K antigen, which has previously been used to express a fusion protein in *E. coli* (Balloul *et al.*, 1987a) was engineered so as to be expressed as a non-fused protein in a similar system (Tessier *et al.*, 1984). Expression systems used in *S. cerevisiae* have been described by Lemoine *et al.* (1987).

Immuno-electron microscopy

Tissues and parasites were fixed in 0.1% glutaraldehyde in 0.1 M sodium cacodylate, pH 7.4, for 45 min and subjected to low temperature dehydration followed by Lowicryl KHM resin embedding as in Roth *et al.* (1981). Grids holding sections were floated for 15 min on a solution of 0.5% ovalbumin in Tris-HCl-buffered saline (20 mM Tris-HCl, 0.5 M NaCl, pH 7.4, TBS) containing 1% decomplexed goat serum. This was followed by incubation with the tested antibodies diluted in TBS-0.5% OVA for 2 h at room temperature and then washed in TBS-0.5% OVA (4 × 15 min). Antibody reaction was revealed by incubation with colloidal gold-labelled goat anti-rabbit IgG and rat IgG (GARG10 and GARaG10, Janssen Pharmaceutica, Beerse, Belgium) (1:40 to 1:50) in TBS-0.5% OVA for 1 h at room temperature. All grids labelled with immunogold were thoroughly washed with buffered ovalbumin and finally with distilled water.

Lowicryl sections were then stained with 1% uranyl acetate and with lead citrate. Observations were made at 80 KV with a Philips EM 420 electron microscope.

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