



Appeal Decisions

Hearing Held on 23 March 2021

Site visit made on 24 March 2021

by R J Perrins MA

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 21 June 2021

Appeal A Ref: APP/M3645/C/20/3247364

The Plantation, Springbottom Lane, Bletchingly, Redhill RH1 4QZ

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
- The appeal is made by Mr Simon Coyle against an enforcement notice issued by Tandridge District Council.
- The enforcement notice, numbered No. 1 (2020), was issued on 17 January 2020.
- The breach of planning control as alleged in the notice is without planning permission the making of a material change of use of the land from equestrian to a use for the stationing of residential caravans and touring caravans, with associated residential storage within the existing stable buildings.
- The requirements of the notice are:
 - (i) Cease the residential use of all caravans and permanently remove them from the land.
 - (ii) cease the use of the stables for residential storage and remove the utilities and residential items from the land.
- The period for compliance with the requirements is 3 months.
- The appeal is proceeding on the grounds set out in section 174(2)(a) and (g) of the Town and Country Planning Act 1990 as amended.

Appeal B Ref: APP/M3645/C/20/3247456

The Plantation, Springbottom Lane, Bletchingly, Redhill RH1 4QZ

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
 - The appeal is made by Mr Simon Coyle against an enforcement notice issued by Tandridge District Council.
 - The enforcement notice numbered No 2. 2020, was issued on 17 January 2020.
 - The breach of planning control as alleged in the notice is without planning permission the installation of a hard surface in the approximate area marked black on the attached Plan B.
 - The requirements of the notice are:
 - (i) Remove the hard surface in the approximate area marked black on the attached plan (Plan B).
 - (ii) Following compliance with (i) above, remove all resulting debris and unused materials from the land to an authorised place of disposal. Reseed the land to grass.
 - The period for compliance with the requirements is 3 months.
 - The appeal is proceeding on the grounds set out in section 174(2)(a), (d) and (g) of the Town and Country Planning Act 1990 as amended.
-

Decisions

Appeal A Ref: APP/M3645/C/20/3247364

1. The appeal succeeds in part on ground (g) and I direct that the enforcement notice be varied by the substitution of 14 months as the period for compliance. Subject to this variation the appeal is dismissed, and the enforcement notice is upheld.

Appeal B Ref: APP/M3645/C/20/3247456

2. The appeal succeeds in part on grounds (d) and (g) I direct that the enforcement notice be varied by the replacement of the plan (labelled Plan B) attached to the notice with the plan attached to this decision. In addition in paragraph 5(i) of the notice the word 'area' be deleted and replaced therfor by the word 'areas'. The notice is also varied by the substitution of 14 months as the period for compliance. Subject to this correction and variation the appeal is dismissed, and the enforcement notice is upheld.

Procedural Matter

3. The Hearing took place on 23 March 2021. With the agreement of all the parties I undertook an access required site visit the following day.

Preliminary Matter – Gypsy Status

4. The definition of gypsies and travellers¹ is set out in the glossary to Planning Policy for Traveller Sites (PPTS). To that end the appellant sets out that he makes his living by laying driveways and patios. He finds work by advertising, including distributing leaflets door-to-door. The work is mainly within the Redhill, Reigate and Dorking areas, but he also travels regularly to horse fairs at Appleby, Epsom, Kenilworth and Stow-on-the-Wold. He finds work on the way to, and from horse fairs, but also conducts some trading at the horse fairs. In total, the appellant's submission is that he and his family travel away from the site for about 8-10 weeks each year.
5. In addition, at the Hearing I heard that he travels regularly to the Bournemouth area to seek work through leafleting, staying in the area whilst doing that. The appellant suggested he has kept horses at the appeal site but not for some time. That matched the Council's assertion that when they have visited the site there has been no evidence of horse related activity and the stables have not been used for stabling for some time. That was also my observation when carrying out the site visit. There was some horse paraphernalia and a small amount of hay but nothing like one would reasonably expect to associate with horse ownership. Although the appellant stated he rented land near Leatherhead for horses.
6. I accept that, there is nothing to corroborate that the appellant and his family travel regularly, to seek work or to trade at fairs. That lack of evidence is also unlike that submitted for the gypsy and traveller site given planning permission

¹ Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

at *Oaklands*² which can be found nearby. In that case, as set out by the Council, the applicant supported his status with letters, photographs and receipts demonstrating a nomadic lifestyle. However, the trade of the applicant in that case differed substantially from that of the appellant, and the description of the appellant's trade discussed at the Hearing is not uncommon for gypsy and travellers.

7. I recognise that the lack of evidence is unhelpful. However, I accept that members of the gypsy and traveller community may not keep the records one would normally expect from running a business. Accounts, invoices, receipts and so on. Whilst, one would expect something to add weight to the appellant's assertions I found his verbal evidence to be clear and there is nothing before me to counter it.
8. Against that background the question I must ask is whether the evidence presented shows the appellant and his dependants having a nomadic lifestyle sufficient to constitute gypsy or traveller status for planning purposes. Whether persons fall within the stated definition is a matter of fact and degree to be applied to their way of life at the time of the determination of the appeal.
9. From all that I have seen and heard I have reached the conclusion that the appellant and his family are from a Gypsy background. Furthermore, current lifestyle and travelling lends weight to a conclusion that the members of the family carry on a nomadic way of life. The appellant travels to find and carry out work in his chosen field and, travels to various gatherings and fairs, working on his way as part of the Gypsy tradition.
10. I am therefore satisfied that, on the balance of probabilities, that the family fall within the PPTS definition of gypsy and traveller at the present time.

Appeal B – ground (d)

11. The Planning Practice Guidance (the Guidance) sets out an appellant is responsible for providing sufficient information to support an application for a Lawful Development Certificate, which is also the equivalent of ground (d) in an enforcement appeal. The Guidance says: "In the case of applications for existing use, if a local planning authority has no evidence itself, nor any from others, to contradict or otherwise make the applicant's version of events less than probable, there is no good reason to refuse the application, provided the applicant's evidence alone is sufficiently precise and unambiguous to justify the grant of a certificate on the balance of probability".
12. Those sentiments apply equally to an Inspector at appeal stage and the tests relate to the area of hardstanding at issue in this appeal. Therefore, in this case, the onus is upon the appellant to demonstrate, on the balance of probabilities, that the hardstanding was substantially complete more than 4 years before the date of the enforcement notice i.e. on or before 17 January 2016.
13. At the Hearing the appellant accepted that part of the hardstanding embraced by the notice³ could not have been constructed prior to 2016 and consideration

² Ref: TA/2019/84 Land at Warwick Wold Road, Bletchingley RH11 3DH *Change of use of land to use as a residential caravan site for one gypsy family with two caravans, including laying of hardstanding and erection of an ancillary amenity building.*

³ An area adjacent to the boundary with The Stables extending into the site to a line taken from the eastern front entrance gate pillar to the easternmost part of the gate on the southern boundary.

underground (d) should be restricted to the remaining area. I see no reason to disagree. If I were to find that there has been more than one operation; one inside the four year period and the remainder outside, that would not be at odds with the judgment in *Sage*⁴ in that each operation could be considered to have reached a stage where no further planning permission would be required for any of the works carried out.

14. It is clear the section referred to by the appellant is complete, as I saw during my site visit, but its construction falls within the four-year period. Turning to the remaining section, the evidence before me consists of a number of aerial photographs of the site, along with a letter and verbal evidence from the previous owner of the site. The authenticity of the photographs is undisputed, and I see no reason not to accept the evidence of the previous owner (Mr Marshall). Namely, that when he constructed the main access onto Springbottom Lane the resultant demolition material was laid on the land. That was alongside some existing concrete patches and concrete tracks leading to the gate at the rear. Part of those concrete tracks I was able to see during my site visit.
15. Whilst I accept that Mr Marshall was unclear initially regarding how far that hardstanding extended in from the road, the photographs point to hardstanding being in situ in 2009. I say that given it is undisputed that the photograph from 2009 shows a car parked on the hardstanding and the colour of that area of land reflects the entrance area. It is also at odds with the colour of; the sand school; the land to the south referred to as the paddock; and the area that the appellant now accepts was laid out within the four-year period.
16. Whilst the Council maintain that the surface cannot be distinguished, they provide no evidence of their own, or from others, to contradict or otherwise make the appellant's version of events less than probable. The Courts have held in *Gabbittas*⁵ that if the Council has no evidence of its own, there is no good reason not to accept that version as long as it is sufficiently precise and unambiguous. For the reason I set out in my previous paragraph I find that, as a matter of fact and degree, to be the case for the area of hardstanding as seen on the aerial photograph dated 2009.
17. However, my deliberations do not end there. The notice embraces a strip of hardstanding to the front of the existing stables and caravan. I saw during my visit that it consists of compacted hardcore. The same strip on the 2009 photograph is green indicating it was laid to grass. Furthermore, the concrete hardstanding to the front of the stables in that photograph remains today and is very much distinct from the newer hardcore strip in age and composition. Moreover, it can be distinguished on the 2020 photograph but not the 2018 which points, as a matter of fact and degree, to it being constructed sometime after 2017.
18. Therefore, regardless of the spreading of pea shingle (which I accept to be maintenance as opposed to operational development in this case), I consider, as a matter of fact and degree, that there have been three distinct operations. They are, the area seen in 2009, the area adjoining the boundary with The Stables, and the strip in front of the existing stables and caravan. On the

⁴ *Sage v SSETR & Maidstone BC* [2003] UKHL 22

⁵ *Gabbittas v SSE & Newham LBC* [1985] JPL 630

balance of probability, only that seen in 2009 had been in situ for more than four years at the time the notice was served.

19. Thus, the appeal on ground (d) succeeds in part and I will amend Plan B attached to the notice to reflect that.

Appeals A & B – ground (a)

20. Given my findings on the ground (d) appeal, my deliberations under this ground and in respect of the hardstanding will focus solely on the two parts which I have found not to be lawful.

Main Issues

21. The appeal site lies within the Green Belt. Paragraph 146 of the National Planning Policy Framework ('the Framework') confirms that material changes in the use of land within the Green Belt are not inappropriate development provided they preserve its openness and do not conflict with the purposes of including land within it. Policy E of Planning Policy for Traveller Sites (PPTS) confirms that Traveller sites in the Green Belt are inappropriate development. It is acknowledged by all parties that it is inappropriate development by definition. The main issues in the appeal, therefore, are:

- The effect on the openness and purposes of including land in the Green Belt:
- The effect of the development on the character and appearance of the area, designated as an Area of Outstanding Natural Beauty (AONB) and an Area of Great Landscape Value (AGLV);
- Whether the appeal site is situated within a sustainable location (Appeal A only); and
- Whether the harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations. If so, would this amount to the very special circumstances required to justify the development.

Reasons

Openness and purposes

22. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The Court of Appeal in *Turner v SSCLG & East Dorset Council* [2016] EWCA Civ 466 has confirmed that the openness of the Green Belt has a spatial aspect as well as a visual aspect. This means that the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result. But equally this does not mean that the openness of the Green Belt has no visual dimension
23. The appeal site is enclosed by a high brick wall to the north and west. To the south and east the site shares residential boundaries with Rockshaw Lodge and the Stables respectively. The site contained a number of existing stables and hardstanding as described above. The notices embrace further hardstanding and residential and touring caravans. I accept that the appeal would see the number of caravans limited to two and no further ancillary buildings would be required given the presence and use of the existing stables. Any business use could be restricted by way of condition.

24. However, I do not accept the assertion that the caravans cannot be seen as discussed below under character and appearance. There are clear views into the site from the well-used public rights of way and adjacent open space. Furthermore, whilst the site was extremely tidy at the time of my site visit it is reasonable to assume that, given the large areas of hardstanding, and area laid to lawn, the current use will lead to greater pressure for parking of vehicles, domestic paraphernalia associated with the use, all of which would go beyond what I saw in what was just a snapshot in time.
25. The mobile home, caravan, parked vehicles and domestic activity, along with the activity and vehicles associated with the appellant's business do not go unseen. Thus, I find that the laying of hardstanding and siting of caravans has led to a harmful loss of openness. That is a matter which carries significant weight against the development.

Character and appearance

26. The site is situated within the Surrey Hills AONB and an AGLV. To the north on the opposite side of the road is Quarry Hangers a Site of Special Scientific Interest (SSSI). Owned by Surrey County Council (SCC) and managed by Surrey Wildlife Trust (SWT). Access to that site, as I saw from my site visit and as evidenced by local residents, is via a Public Bridleway which joins Spring Bottom Lane a short distance East of the site. That bridleway leads up to another bridleway (the North Downs Way) and views south, from these public paths across, the site are plentiful. In addition, I saw access was available across the land managed by SWT, and opposite the site, where again views, particularly on the upper slope were readily available.
27. Against that background I accept that the PPTS does not discount suitable sites in rural areas and the countryside. That in turn may have consequences in respect of visual impact and a degree of visual harm may, depending on particular circumstances, be accepted. In addition the PPTS allows weight to be attached to soft landscaping that positively enhances the environment and increases its openness.
28. In this case the appeal site contained buildings and hard surfacing prior to the alleged use and operation development. The appellant's assertion that it is previously developed land is undisputed. In addition, I accept that the Surrey Hills AONB Planning advisor conceded that the site did not play an important role in the wider landscape and that boundary walls largely screened the mobile home, vehicles and residential paraphernalia, when consulted in 2017. However, he also stated that this stretch of Springbottom Road is important because of views from the North Down Way and that just because a development could not be seen is not justification for a development in a nationally protected landscape. That is an argument that could be repeated with a cumulatively harmful effect. Moreover, it is not clear if the AONB Officer viewed the site from the adjacent land and the Public Rights of Way.
29. Whilst I accept improvements have been made to the site access and that conditions could be imposed to secure additional landscaping. I am not satisfied that could overcome the harm to the AONB, AGLV and the countryside in this location. The, caravans, domestic paraphernalia, car parking and extensive hardsurfacing are at odds with the countryside location and wider rural landscape. The development has impacted the visual amenity in the locality introducing development where none existed. That impact is limited from the

road given the screening but is significant when viewed from further afield as set out. Any landscape mitigation would take a significant number of years to become effective. For these reasons a significant level of harm to the character and appearance of the area, countryside location, AONB and AGLV has occurred.

30. That is at odds with the Framework which states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. The harm is also at odds with Policy CSP 20 of the Tandridge District Core Strategy 2008 (CS) which provides that conservation and enhancement of the natural beauty of the landscape is of primary importance in an AONB and Policy CSP 21 of the CS which seeks to protect the character of the countryside and landscape for its own sake. In addition Policy DP7(10) of the Tandridge Local Plan *Part 2 Detailed Policies 2014-2029* (LP) requires valuable environmental assets to be enhanced.
31. In coming to that view, I have considered the appeal decisions⁶ concerning a site in Kent. However, the backdrop to that site was dominated by a main road and the significant landform disruption of a former quarry/landfill; it is not comparable.

Sustainable location

32. The site is in a location away from any settlements. There is no dispute that it is not easily accessible by public transport and that services and facilities including shops, restaurants, schools, hairdressers and the like. The nearest being Mersham and Caterham. Site occupiers are therefore likely to be reliant on the car as the main mode of transport. Nevertheless, PPTS anticipates the likelihood of rural sites in the countryside and the Framework recognises that opportunities to maximise sustainable transport will vary from urban to rural areas
33. In addition, I recognise as set out in the submitted appeals⁷ that traveller sites are more likely than not in more rural districts to be in the countryside. I also see no reason to disagree with the view that the site is within an enclave of residential development and is not 'isolated' from the settlement as set out by the high court in the case of *Braintree*⁸.
34. There will be a reliance on the private car to access facilities and services, over and above the travelling associated with a nomadic way of life. However, distances of 1.8kms to Mersham and 3 kms to Caterham are undisputed. Travel will therefore be relatively short and given the current use, as one pitch occupied by one family, will not generate a large number of trips.
35. Policy CSP1 of the CS permits development in order to promote sustainable patterns of travel. That is reflected by Policy DP1 of LP which sets out a positive approach in favour of sustainable development. In addition, PPTS requires sites to be economically, socially and environmentally sustainable. The site would provide the appellant and his family with a settled base. The need for continuous travelling associated with living on the roadside would be reduced and it would give the family a safe and secure base for ready access to health and education. These are social and environmental benefits.

⁶ APP/U2235/C/17/3175400 & 3173195

⁷ APP/R0660/W/15/3137298 & APP/U2235/C/17/3175400, APP/U2235/3173195

⁸ *Braintree DC v SSC&LG & Ors* [2017] EWHC 2743 Admin

36. Overall, in the context of gypsy and traveller sites, the appeal site is within a reasonable distance of local services and facilities; it is not isolated in the round in context of a gypsy and traveller site. There is therefore, no conflict with planning policy in that regard.

Other considerations

Need

37. At the Hearing there was some discussion around the issue of need for gypsy and traveller sites within the district. The Gypsy and Traveller Accommodation Assessment (GTAA) was commissioned by the Council and published in 2017 to provide evidence to support the emerging LP. The data therein was gathered through interviews with available site occupiers. The GTAA was carried out to assess the need but such matters may not be exact particularly in the face of a high number of absent occupiers, the needs of households who do not meet the definition, alongside new household formation rates.
38. It can be no surprise therefore that the parties had differing views on need. I do not doubt the appellant's agent, experienced in many gypsy and traveller appeals including within this authority, has access to different information to that of the Council and a stronger view about the lack of available sites within the District. I also accept that seven pitches have been given permission since 2019. Whilst the Council put forward that those pitches satisfied the need between 2016 and 2021, the argument that those pitches did not address the unknowns identified by the GTAA cannot be ignored. Nor can the potential additional need for a further 15 pitches as identified in the GTAA.
39. Furthermore, the Council, whilst suggesting some sites outside of the Green Belt and AONB would be available, accepted there was a need to be addressed going forward. Moreover, I see no reason to disagree with the view, as set out in the Council's *Oaklands* officer report (dated July 2020). Namely, there is an outstanding need for additional traveller pitches as identified by the GTAA and this weighs significantly in favour of this development. There is, in that light, no need for me to forensically assess the GTAA numbers and recent permissions. Detail for the latter not being submitted in any event.
40. Thus, I find the need for additional pitches in the district to be a matter that attracts significant weight.

Lack of Alternative Sites

41. The Emerging Tandridge Local Plan recognises edge of settlement sites will rarely be available for gypsy and travellers because such land is more profitably used for mainstream housing. Whilst there is a recognition that the proposed South Godstone Garden Community could provide an opportunity for such accommodation in a sustainable location, no site allocations have been proposed in the emerging local plan.
42. The Council witness suggested some sites would be available to the appellant but no evidence has been submitted to corroborate that assertion. There is nothing before me to place any certainty on how the immediate needs of those requiring a caravan site are going to be met or any timetable for addressing a longer-term solution.
43. This lack of suitable available alternative sites carries great weight.

Local criteria

44. The appellant points to Policy CSP 9 of the CS and appeal decisions⁹ which take into account how a caravan site near Solihull meets the specific criteria of a local plan policy for gypsy and traveller sites and, in that case, performance against the criteria in the policy as a whole weighed in favour of the development.
45. Policy CSP 9 is not relied upon by the Council but sets out the criteria to meet unexpected proven need, including, amongst other things, that very special circumstances exist (which I address below), that the development does not significantly harm the visual amenities and character of the area and preference will be given to sites that are accessible by non-car modes of transport. I have identified those particular criteria as my deliberations have found the development does not meet them for the reasons set out under the relevant headings.
46. I do not therefore agree that this case, unlike the Solihull appeals, performs well against the policy as a whole. This matter does not therefore weigh in favour of the development as it is at odds with Policy CSP 9 in any event. Indeed, as it is contrary to the policy, it inevitably adds further weight against the development.

Personal Circumstances

47. The site is occupied by the appellant his wife and children. One of the children is home schooled and two are at a nearby primary school, with another pre-school age. It is accepted that the children of school age need a settled base to access full-time education and that is also essential for continuity of health care provision for the family. The family have previously lived at a public site in Green Lane, Outwood within the district and I am informed that when the site was change to private management, a pitch was no longer available to the appellant and his family.
48. Case law¹⁰ establishes that the best interests of the children are a primary consideration. A settled base rather than a predominantly road-side existence is clearly in the best interests of the children. I give the best interests of the children substantial weight.

Balancing exercise

49. Inappropriate development is by definition harmful to the Green Belt. There would be a loss of openness in the Green Belt and the proposed development would encroach into the Green Belt (conflicting with one of the purposes of Green Belt designation). The Framework makes it clear that substantial weight attaches to the totality of such harm.
50. In addition, I have found conflict with the Framework and Policies CSP 20 and 21 of the CS along with Policy DP7 of the LP which seek to protect the character and appearance of the AONB, AGLV and countryside location. The Framework is clear in respect of AONBs, in that great weight should be given to conserving and enhancing landscape and scenic beauty in the AONB. These matters together also attract significant weight.

⁹ APP/Q4625/C/13/2209742; APP/Q4625/C/13/2209777, APP/Q4625/A/13/2209776

¹⁰ Including *AZ v SSCLG & South Gloucestershire DC* [2012] EWHC 3660 (Admin)

51. Policy DP10 of the LP sets out that proposals involving inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations clearly outweigh any potential harm to the Green Belt by reason of inappropriateness and any other harm.
52. Matters weighing in favour include the need for the site both generally and personally, in the face of a recognised lack of supply and uncertainty around the future supply of sites. I recognise the unmet need is not certain to be met in the immediate future. These matters in combination carry considerable weight. The PPTS is also clear in that subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh the harm to Green Belt and any other harm.
53. However, in my judgement, the combination of these factors is not sufficient to clearly outweigh the harm by inappropriateness and other harm. The substantial harm to the Green Belt, and the significant harm to the character and appearance of the countryside location, AONB and AGLV, are cumulatively of greater weight. I therefore find the development at odds with the Framework and Policy DP 10 of the LP in that the other considerations do not clearly outweigh the harm such that very special circumstances may exist. The use of the land and hardstanding is also at odds with those other parts of the Framework and local planning policies as set out in my reasoning.
54. Finally, the land opposite the site includes land designated as SSSI. Neither party has advanced a case as to the effects, or otherwise, of the development upon it. As I have found the appeals on ground (a) fail for other reasons, there is no need for me to address this matter further.
55. Thus, having considered all that I have read and heard, the appeals on ground (a) therefore fail.

Appeals A & B - The appeal on ground (g)

56. For both appeals, the appellant seeks a period of 18 months to obtain alternative lawful accommodation for his caravans if the family is to avoid homelessness. The Council suggest a maximum of 18 months. I recognise that securing a lawful site would take time although there is no detailed justification before me to suggest that a period of 18 months is necessary. Nevertheless, I am mindful that two of the children are at important times in their schooling and extending the compliance period to include the next school year would not be unreasonable.
57. Whilst under normal circumstances the extension of a compliance period beyond 12 months would be exceptional, given the bests interest of the children and possibility of losing their home, I shall extend the compliance period to 14 months to ensure another school year will be covered. This would be a proportionate response.
58. Thus, the appeals on ground (g) succeed in part.

Richard Perrins

Inspector

APPEARANCES

FOR THE APPELLANT:	
--------------------	--

Mr Philip Brown BA(Hons) MRTPI	Planning Agent
Mr Simon Coyle	Appellant
Mr Alan Masters of Counsel	Legal representative
Mr Marshall	Interested party

FOR THE LOCAL PLANNING AUTHORITY:	
-----------------------------------	--

Mr Cliff Thurlow BA(Hons) Dip TP MRTPI	Planning Consultant
--	---------------------

INTERESTED PERSONS:	
---------------------	--

Mr Oliver Byrne	Interested party
-----------------	------------------



Plan

This is the plan referred to in my decision dated: 21 June 2021

by R J Perrins MA

Land at: The Plantation, Springbottom Lane, Bletchingly, Redhill RH1 4QZ

Reference: APP/M3645/C/20/3247456

Scale: Not to Scale

Plan B

