



Appeal Decisions

Hearing held on 2 November 2021

Site visit made 2 and 3 November 2021

by Thomas Shields MA DipURP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 08 March 2022

Appeal A: APP/Y3615/C/21/3272315

Land between Grafton and The Haven, Polesden Lane, Ripley, Surrey, GU23 6DX

- 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 Act").
- The appeal is made by Mr A James against an enforcement notice issued by the Guildford Borough Council.
- The enforcement notice was issued on 18 February 2021.
- The breach of planning control alleged in the notice is without planning permission;
 - (i) the making of a material change of use of the land from a nil use to use of the land for residential purposes through the stationing of a static caravan/mobile home and for the storage of vehicles;
 - (ii) the erection on the land of a day room, outbuildings, fencing and a children's play structure;
 - (iii) the laying of hardstanding and the construction of a cesspit to facilitate the stationing of the mobile home and the development in (i) and (ii) above.
- The requirements of the enforcement notice are:
 - (iv) Cease the residential use of the Land including the storage of vehicles;
 - (v) Permanently remove from the Land the static mobile home, touring caravan, vehicles, outbuildings, day room, close boarded fencing and play equipment erected on the Land and all domestic and other paraphernalia brought onto the Land to facilitate the residential use;
 - (vi) Dig up and permanently remove the hardstanding from the Land;
 - (vii) Permanently remove from the land the cess pit;
 - (viii) Permanently remove from the Land all materials, rubble, rubbish and debris arising from steps (i-iv);
 - (ix) Reseed the Land with grass;
 - (x) Reinstall the field gate at the entrance to the Land onto Polesden Lane with a gate similar in appearance to the one shown in the photograph attached to this notice.
- The period for compliance with the requirements is 6 months.
- The appeal is proceeding on grounds set out in section 174(2)(a) and (g) of the Act. Since an appeal has been brought on ground (a), an application for planning permission is deemed to have been made under section 177(5) of the Act.

Summary of Decision: The appeal is dismissed and the enforcement notice is upheld with corrections and a variation in the terms set out below in the Formal Decision.

Appeal B: APP/Y3615/W/20/3259889

Land between Grafton and The Haven, Polesden Lane, Ripley, Surrey, GU23 6DX

- The appeal is made under section 78 of the Act against a refusal to grant planning permission.
- The appeal is made by Mr A James against the decision of the Guildford Borough Council

- The application Ref 20/P/00557, dated 27 March 2020, was refused by notice dated 7 August 2020.
- The development proposed is the siting of 1 mobile home and the erection of a day room.

Summary of Decision: The appeal is dismissed.

Appeal C: APP/Y3615/W/20/3259890

Land between Grafton and The Haven, Polesden Lane, Ripley, Surrey, GU23 6DX

- The appeal is made under section 78 of the Act against a refusal to grant outline planning permission.
- The appeal is made by Mr A James against the decision of the Guildford Borough Council.
- The application Ref 20/P/00558, dated 27 March 2020, was refused by notice dated 7 July 2020.
- The development proposed is the erection of a detached dwelling.

Summary of Decision: The appeal is dismissed.

APPEAL A - ground (a), Appeal B, Appeal C

PRELIMINARY MATTERS

1. In Appeal A the alleged breach of planning control at Section 3(i) of the enforcement notice refers to use of the land for residential purposes through the stationing of a "static caravan/mobile home and for the storage of vehicles". It was clarified with the Council that "static caravan/mobile home" relates to the single twin-unit "caravan"¹ on site, and that "storage of vehicles" relates to the appellant's own vehicles kept on site as part of his family's primary residential use, rather than as part of a mix of two primary uses for residential use and for storage unrelated to the residential use.
2. As such, the parties agreed that I should correct the alleged breach, and the related requirements at Section 5(i) and (ii) of the notice, to refer to a single static caravan and to omit references to mobile home and to storage of vehicles. I am satisfied that these corrections would not result in injustice to any party. I will therefore correct the notice accordingly using powers available to me under s176(1) of the Act.
3. The appeal site lies within 5 km of the Thames Basin Heaths Special Protection Area (TBHSPA). Draft Unilateral Undertakings² (UU) were discussed at the hearing and subsequently three completed and executed UUs were submitted, one for each of the 3 appeals. They would provide financial contributions towards Suitable Alternative Natural Greenspace (SANGS) and Strategic Access Management and Monitoring (SAMM) measures as mitigation for the likely significant effects of the proposed development on the TBHSPA. I return to this matter later.
4. Subsequent to the Council's refusal of planning permission and enforcement notice being issued the Lovelace Neighbourhood Plan (LNP) was made in May 2021. It therefore carries full weight and forms part of the Council's statutory Development Plan. Accordingly, I have taken account of the LNP in reaching my decisions.

¹ "Caravan" as defined: S29(1) Caravan Sites and Control of Development Act 1960 and s13(1) and (2) Caravan Sites Act 1968

² Draft Planning Obligations pursuant to s106 Town and Country Planning Act 1990

REASONS

Policy background

5. With regard to Appeals A and B the Council does not have a specific criteria based policy against which the suitability of Gypsy and Traveller sites could be assessed. The Council's approach to provision of sites, including any that may fall within the Green Belt, via Policy S2 of the Guildford Borough Local Plan: Strategy and Sites (2019) (LP), reflects the approach advised in Policy E of PPTS³ by inseting sites through the LP process. However, that approach does not weigh against individual applications for sites in the Green Belt from being granted planning permission on their individual merits where harm to the Green Belt, and any other harm, is clearly outweighed so as to establish very special circumstances.

Main Issues

6. The main issues are:
- (a) Gypsy/Traveller status;
 - (b) whether the development would be inappropriate development in the Green Belt;
 - (c) the effect on the openness of the Green Belt;
 - (d) the effect on character and appearance of the area;
 - (e) the effect on the living conditions of neighbouring occupiers;
 - (f) the effect on TBHSPA;
 - (g) the effect on highway safety; and
 - (h) whether any harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances required to justify the development.

(a) Gypsy/Traveller status

7. This matter relates to appeals A and B. During the hearing I heard that the appellant currently lives at the appeal site with his wife and two children, and with another child expected in January 2022. He was born in Bradford to parents of Romany descent and both he and his wife are ethnic Romany Gypsies. He and his wife have lived in southern England for most of their lives and he has travelled for work as a roofer for about the last 10 years. He mostly works in the southern counties travelling to and from work either daily or for longer periods away, dependent upon on commuting distances and travel times. He and his family also attend traditional Traveller community events and fairs such as those at Appleby and Stow. Due to the Coronavirus pandemic their travelling for cultural and work related purposes has been very limited more recently. However, there was no suggestion that either he or his wife intended to give up travelling permanently. A more detailed description of his family's way of life and his travelling for economic purposes is set out in his submitted written statement.
8. Based on all that I heard and have read I am satisfied that the appellant and his family have a way of life that is nomadic in character and that the appellant's travelling is predominantly for economic purposes. As such, I

³ Planning Policy for Traveller Sites, DCLG, 2019

consider that he has Gypsy status as defined in the PPTS. Accordingly, the PPTS and Framework⁴ are relevant material considerations, in addition to the Council's Development Plan policies against which the development should be assessed.

(b) Whether inappropriate development in the Green Belt

Appeals A and B

9. It is common ground between the main parties, and I agree, that the proposed development, either as a permanent or a temporary traveller site, constitutes 'inappropriate development' within the Green Belt as set out at PPTS paragraph 16. Inappropriate development by definition is harmful to the Green Belt.

Appeal C

10. With reference to case law⁵ the appellant considers that although the appeal site for the proposed detached dwellinghouse is located in countryside beyond the defined Ripley village boundary, it nonetheless lies within the settlement fringe of the village. As such, it is argued, the proposal would constitute 'limited infilling in a village' and thereby an exception to being inappropriate development as set out in Framework paragraph 149(e) and LP Policy P2(2)(c).
11. Whether, in the context of these policies, a site located outside of a defined village boundary should be treated as being within the village is a matter of planning judgment on a case by case basis. The relationship to the defined boundary is only one consideration. Other relevant factors to consider include the number of buildings or properties that are grouped together, their inter-relationship and spacing, the facilities and services available and the juxtaposition of the site with surrounding buildings and any open land beyond. The Council's reasoned justification to LP Policy P2 under the heading of "limited infilling" reflects such an approach.
12. A number of appeal decisions at other locations are referred to by the appellant. While the particular determinative details in these decisions, in respect of location, differ to those in this appeal, they also highlight that a case by case judgement is required.
13. Following on from the above, the area of Polesden Lane around the appeal site is a narrow rural lane lined with mature trees and hedgerow having a small number of residential dwellings occupying generous plots either side of the lane towards its northern end. The appeal site lies between two of these existing residential properties on the western side of the lane, being over 650 metres away from the defined village boundary. The village amenities are also a considerable distance away (by road) including the primary school (1km), and the High Street area retail and other facilities (1.3km).
14. I consider that the rural character of the lane, with the low density layout of ribbon development housing, contrasts markedly with the typically tighter grain and density of development within the village itself. Additionally, the appeal site is physically separated from the village by the length and width of

⁴ National Planning Policy Framework (2021)

⁵ *Julian Wood v SSCLG, Gravesham Borough Council* [2015] EWCA Civ 195

the Papercourt Lake and SSSI to the east of Polesden Lane, with further open countryside beyond it up to the main built up area of the village. To my mind the lake is an intrinsic feature of the open countryside outside of the village settlement, rather than being within an extended fringe of the settlement so as to include the appeal site as suggested by the appellant.

15. Taking account of all these factors I find overall that the appeal site is not within a village and hence does not constitute a Green Belt policy exception as outlined previously. The proposed dwelling would therefore be inappropriate development and harmful to the Green Belt in conflict with LP Policy P2 and LNP Policy LNPH1.

(c) Effect on openness of the Green Belt

16. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and the essential characteristics of Green Belts are their openness and their permanence. The Courts have held (*Turner*⁶) that perceptions of openness can be visual as well as spatial, and that matters relevant to openness in any particular case are a matter of planning judgement, rather than a matter of law (*Samuel Smith*⁷).

Appeals A and B

17. The development comprises the smallest scale (single pitch) of Gypsy and Traveller site accommodation. The site is level and so not prominent in the context of open land beyond, and planning conditions could ensure the planting/retention of natural boundaries to limit its visibility (insofar as affecting openness). Even so, in comparison to what was previously open land the introduction of a twin unit caravan, single touring caravan, and together with the day room and hard surfaced areas on site, I find that there would be a continuing reduction in openness in both visual and spatial terms, albeit resulting in a limited level of harm to the Green Belt.

Appeal C

18. Other than for access details the proposal for the dwellinghouse is in outline form, hence the submitted drawings relating to the development within the site are indicative only. Nonetheless, the proposed dwellinghouse is capable of being restricted in height by planning condition. Additionally, its positioning within the site and other layout and boundary details could be secured at reserved matters stage. However, even a modest single storey dwelling anywhere within the site would likely result in a similar reduction in openness to that described above in respect of Appeals A and B, albeit with a similar limited level of harm to the Green Belt.

(d) Character and appearance of the area

Appeals A and B

19. The nature of the appeal development as a residential Gypsy and Traveller site does not of itself confer an adverse effect on the character and appearance of the area. Indeed, PPTS acknowledges that such sites can be located in the countryside. Additionally, in terms of its scale and finished

⁶ *Turner v SSCLG & East Dorset Council* [2016] EWCA Civ 466

⁷ *R (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant)* [2020] UKSC

appearance the twin unit caravan on site is similar to many brick-built bungalows, and the day room comparable with a typical residential outbuilding. A touring caravan kept on site would also be comparable in visual terms to those commonly kept by house occupiers. Given these factors, together with the location of the site between two existing dwellings, all within a wider cluster of residential properties on this part of Polesden Lane, I find there would be no adverse effect on the prevailing residential character and appearance of this rural area.

Appeal C

20. The Council's reasons for refusal of the application do not include that there would be harm to the character and appearance of the area, although it was raised in some third party submissions.
21. Similar to appeals A and B above, I find that the construction of an appropriately designed and suitably sized dwellinghouse would accord with the residential character and appearance of the street scene and the wider area I have described. As such, there would be no harm in this regard.

(e) Living conditions of neighbouring occupiers

22. The garden play structure subject of the enforcement notice (Appeal A) was said to have resulted in overlooking and loss of privacy to the occupiers of the neighbouring property. However, it had been removed prior to the hearing and the appellant confirmed it does not form part of the deemed application.

(f) Thames Basin Heaths Special Protection Area (TBHSPA)

23. The TBHSPA is designated for its internationally important habitat which supports breeding populations of three rare species of birds (the Nightjar, Woodlark and Dartford Warbler). The birds are vulnerable to disturbance from recreational activities including those associated with new residential development. The conservation objectives for the TBHSPA seek to protect or restore the habitat in order to protect the birds that depend on its integrity.
24. However, notwithstanding the appellant's completed UUs which would provide the mitigating financial contributions required by the Council, I have found the proposed development to be unacceptable for other reasons. Consequently, there is no need for me to consider the implications of the development on the integrity of the TBHSPA or the provisions of the Conservation and Habitats and Species Regulations 2017 (as amended).

(g) Highway safety

Appeals A, B and C

25. The vehicular access at the appeal site is located on Polesden Lane where it is a single carriageway, with no pavements either side, and with other vehicular accesses to properties in close proximity.
26. The lane is subject to a 60mph speed limit for which the Highway Authority (HA) requirement for visibility splays would normally be 2.4m x 225m in both directions. However, visibility splay requirements can be reduced in circumstances where it can be demonstrated that vehicular speeds are lower.

27. The appellant relies on a submitted speed survey which recorded 85th percentile speeds of approximately 30mph in each direction. On the basis of the survey it is argued that a 2m x 40m splay in each direction would be adequate. This is not disputed by the Council. However, the 40m visibility splays can only be achieved in both directions by cutting across land outside of the appeal site. Consequently, there is no guarantee that clear unobstructed visibility splays can be provided or maintained. Without cutting across adjoining land, the maximum visibility splays would be 29m to the north and 21m to the south, both of which the Council argue would fall substantially short of providing a safe access.
28. In support of allowing the appeal I was referred to advice in MFS2⁸ which suggests, dependent upon local circumstances, that a reduction in visibility below recommended levels will not necessarily lead to a significant problem. I accept that may be the case, although the relevant circumstances in each individual case will be critical in making such a judgement. In this regard I undertook observations of traffic behaviour on two occasions. Firstly during the early evening after the hearing had closed when traffic was relatively busy, and secondly during the morning from 10:00am to 10:30am when traffic was light.
29. I saw that in both approaches to the appeal site the usable width of the lane varies slightly at some points due to protruding verge banking and vegetation. Vehicles are only able to pass each other along this part of the lane by making use of existing accesses, or where banking has been eroded, to pull in and give way to opposing vehicles. During the evening observations I noted that this was a frequent necessity, including some drivers having to brake heavily and/or to reverse to a "passing position".
30. During the morning observations when traffic was much lighter I saw that some vehicles travelled at speeds which in my opinion were well in excess of 30mph. In several instances the higher speeds appeared to occur when a vehicle, following some distance behind another in front, used the front vehicle as a 'moving block' against oncoming traffic further ahead. This resulted in the rear vehicle travelling at speed past the access points to properties, including the appeal site. In terms of a vehicle emerging from the appeal site access, to turn in either direction, visibility to the south along the lane is particularly restricted, requiring an emerging vehicle to creep forward. In these circumstances any vehicle travelling towards the appeal site from the south is likely to result in sudden braking from either or both vehicles in order to avoid collision. Moreover, vehicles travelling above 30mph from the south towards the access would result in a significantly greater risk of collision. The addition of any pedestrians into these conditions would further impede visibility and increase the risk to highway safety for all users.
31. I acknowledge that my observations were of relatively limited timescales. However, all of these factors, together with my own observations, lead me to find that a suitable and safe level of visibility in both directions for vehicles emerging from the appeal site access cannot be achieved. I acknowledge that there have been no recorded accidents in over 20 years, and that there are other substandard vehicular accesses nearby. However, adding a further substandard access in close proximity to those others along this part of the

⁸ "Manual for Streets 2", Chartered Institution of Highways & Transportation (2010)

lane would not be neutral in effect, rather I consider it significantly increases the risk of accidents occurring to an unacceptable degree.

32. To conclude on this issue, the proposed development would have a significantly adverse effect on highway safety, in conflict with LP Policy ID3 and paragraph 110 of the Framework.

(h) Other considerations

Appeals A and B

Need and supply of sites

33. The Council considers the current supply of traveller sites in the area meets the identified need for sites over the Local Plan period. In doing so it relies on the findings of the Traveller Accommodation Assessment (2017) which set the need target for 4 permanent pitches to 2022, set out in LP Policy S2(3). Details of expected delivery and timescales over the plan period are set out in Appendix 6 to the Council's Land Availability Assessment (2020).
34. Although no detailed written alternative analysis of need and supply was submitted as part of the appellant's evidence, it was argued that the need for sites is greater than the Council has identified. In particular; that the current need assessment does not adequately take account of need arising from persons whose (PPTS) Traveller status is "unknown"; from other unauthorised sites; from families "doubling-up" on existing authorised sites; and from personal planning permissions lapsing in future. Also, that the current appeal development itself demonstrates additional need.
35. While I acknowledge the parties' differing positions on this matter, and potentially a degree of uncertainty as to accuracy of current and future need, the Council's TAA is nonetheless the most comprehensive and robust assessment before me. It was also examined through the process of adoption of the Local Plan which was found to be sound in 2019. As such, I find on the balance of the evidence before me that there is unlikely to be any significant level of unmet need. That said, in a broader context I the small single-pitch scale of this proposal is unlikely to have any significant detrimental effect on the strategic plan-led approach to site provision via LP Policy S2.
36. Contrary to the argument made on behalf of the appellant, there is no convincing evidence before me which demonstrates there has been a 'policy failure' arising from a persistent Council failure to put policies or other measures in place to meet Travellers' accommodation needs in combination with a long-standing unmet need for sites.
37. I acknowledge that some future allocated sites may also be within the Green Belt, with the same or similar levels of harm to the Green Belt as in this case. However, other Green Belt sites may not have the same combination of factors, and balancing of issues and harms, as those in this appeal. As such, each case needs to be assessed on its individual merits.

Alternative sites

38. In support of allowing the appeal the appellant's undisputed evidence is that there are currently no available and suitable alternative sites which would facilitate him and his family living together. I also find that to be the case.

Personal circumstances

39. The *best interests of the child* are a primary consideration and no other consideration is inherently more important⁹. Allowing the appeal would provide a permanent base for the appellant and his family, thereby delivering the children the best opportunity of a secure and stable family life, safe play and access to education, health and other services. In contrast, dismissing the appeal would result in unpredictable living conditions and would likely be deleterious to the health and social outcomes for the family as a whole, and particularly so to the educational, social and general well-being outcomes of the children.
40. Dismissing the appeals would infringe the family's rights under Article 8 of the Human Rights Act 1998 with regard to respect for family life and the home. However, interference with such rights may be justified in the wider public interest in accordance with other laws. I also take into account the fact that the appellant and his family are Romany Gypsies and hence are persons who share a protected characteristic for the purposes of the Equality Act 2010. As such, I have a duty therefore to eliminate discrimination and to advance equality of opportunity between persons who share a protected characteristic and those who do not.

Appeal C

41. The appellant states he has exhausted his savings and that allowing the appeal would provide him with the funding, from the sale of the site, for the purchase of an alternative pitch elsewhere. However, the appellant took a risk in purchasing the appeal site without first having the necessary planning permission in place. While I have some sympathy for the appellant's situation, this does not attract any significant weight in support of allowing the appeal.

Green Belt Balance

Appeals A and B

42. The Framework, also reflected in LP Policy P2, requires that substantial weight be given to any harm to the Green Belt, and that *very special circumstances* will not exist unless any harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
43. The proposed development is inappropriate development and is therefore harmful by definition. I attach substantial weight to that harm. I have also identified a limited level of harm resulting from some loss of Green Belt openness which attracts a further degree of limited weight. Additionally, I have found harm arising from a significant adverse effect on highway safety, to which I attach very substantial weight.
44. Against the totality of this harm there are factors which weigh in support of allowing the appeals. I attach weight to the site's sustainable location with reasonably good access to a range of facilities and services. The small scale proposal is unlikely to have any significant detrimental effect on the strategic plan-led approach to site provision via LP Policy S2. This, together with an

⁹ Article 3(1) United Nations Convention on the Rights of the Child, and *Collins v SSCLG* [2013] EWCA Civ 1193.

absence of alternative available and suitable sites for the family, attracts further weight.

45. A permanent base would result in significant benefits for the well-being of the family and would facilitate the Gypsy way of life. With regard to health, education and establishing a stable and secure family life, the best interests of the children are a primary consideration. I attach substantial weight to these factors.
46. Although some of the harm I have identified might in comparison be repeated at other Green Belt sites that may come forward in future, each case must be assessed on its individual merit. I attach only limited weight to this matter.
47. Dismissing the appeals and upholding the enforcement notice would infringe the appellants Article 8 rights. However, it would be a proportionate response in the wider public interest of protecting the Green Belt and public safety in accordance with planning policy and law.
48. Having regard to all of the above matters I find on balance that the totality of the harm to the Green Belt and to highway safety is not clearly outweighed by the combined weight I attach to other considerations in support of allowing the appeal. Consequently, very special circumstances necessary to justify the development do not exist.
49. Moreover, even if I had found in support of allowing the appeal with regard to the need for sites and in respect of all other considerations, the combined weight attributed to those matters would nonetheless be outweighed by the significant adverse effect on highway safety alone.
50. Although a temporary and/or a personal planning permission would reduce some harm to the Green Belt, the continuing significant harm to highway safety would not be outweighed. As such, the development (Appeals A and B) conflict with the Development Plan as a whole and the appeals must fail.

Appeal C

51. The proposed dwellinghouse would be inappropriate development in the Green Belt; harmful by definition, and to which I attach substantial weight. It would result in some loss of openness which attracts further limited weight. The risk to highway safety is also harmful as I have previously described, to which I attach very substantial weight.
52. The other considerations advanced for the appellant in support of allowing the appeal do not attract any significant weight. They do not clearly outweigh the harm to the Green Belt and the harm to highway safety. Consequently very special circumstances necessary to justify the development do not exist. The development conflicts with the Development Plan as a whole and the appeal must fail.

APPEAL A, ground (g)

53. The notice requires compliance with its requirements within 6 months. The appellant seeks a period of 12 months.
54. Given my strong concerns regarding highway safety I am disinclined to allow that situation to continue any longer than the notice allows.

55. Against that, however, I am aware that finding and securing an alternative site location which would not disrupt the children's education, family life, and their best interests more generally, or at least a location which would minimise impacts on those, is likely to be difficult and may take longer than 6 months.

56. On balance I consider a period of 8 months would be more reasonable. I will vary the enforcement notice accordingly. The appeal on ground (g) succeeds to this extent.

FORMAL DECISIONS:

Appeal A

57. It is directed that the enforcement notice is corrected and varied by:

- in Section 3 deleting all of paragraph (i) and substituting instead the following words: "the making of a material change of use to use of the land for residential purposes through the stationing of a static caravan";
- in Section 5(i) deleting all of the words after the word "Land";
- in Section 5 (ii) deleting the words "mobile home" and substituting instead the words "static caravan";
- in Section 6 deleting "6 months" and substituting instead "8 months".

58. Subject to the corrections and variation the appeal is dismissed, the enforcement notice is upheld and planning permission is refused on the application deemed to have been made under section 177(5) of the Act.

Appeal B

59. The appeal is dismissed.

Appeal C

60. The appeal is dismissed.

Thomas Shields

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Alan Masters of Counsel	1 Pump Court
Brian Woods BA(TP) MRTPI	WS Planning and Architecture
David McMurtary	Motion.co.uk
Abraham James	Appellant
Christine James	Appellant's wife

FOR THE LOCAL PLANNING AUTHORITY:

Clare Parry of Counsel	Cornerstone Barristers
Katie Williams	Planning Officer
Joanna Searle	Senior Compliance Officer
Kate Lines	Planning Officer
Hossein Amirhosseini	Surrey County Council (Highway Authority)

INTERESTED PERSONS:

Simon Bell	Representing Polesden Lane Residents Association
Graham Simmons	Local resident
Heather Thompson	Local resident
Chris Lee	Local resident

DOCUMENTS SUBMITTED AT THE HEARING:

DOC 1	2 x school reports
DOC 2	Health Authority correspondence
DOC 3	H.M Land Registry Titles: SY721567, SY726208, SY565131
DOC 4	Extract from 'Manual for Streets 2'
DOC 5	Draft unilateral undertaking (Ref 20/P/00557)
DOC 6	Draft unilateral undertaking (Ref 20/P/00558)