



Appeal Decisions

Hearing held on 26 March 2024

Site visit made on 27 March 2024

by N Thomas MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 13th August 2024

Appeal A Ref: APP/P0240/C/23/3331075

Land at the rear of Home Farm, Dunstable Road, Tilsworth, Leighton Buzzard LU7 9PU

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended. The appeal is made by Mr Bernard McDonagh against an enforcement notice issued by Central Bedfordshire Council.
- The notice was issued on 12 September 2023.
- The breach of planning control as alleged in the notice is the unauthorised material change of use to a residential Gypsy and Traveller site with the siting of caravans for residential use.
- The requirements of the notice are to:
 - a) Cease using the Land as a Residential Gypsy and Traveller site.
 - b) Remove from the Land all caravans associated with the residential use.
 - c) Remove all items associated with the unlawful use of the Land,
 - d) Restore the Land to its previous use as agricultural land.
- The period for compliance with the requirements is 4 months.
- The appeal is proceeding on the grounds set out in section 174(2)(a), (g) of the Town and Country Planning Act 1990 as amended. 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.

Appeal B Ref: APP/P0240/C/23/3331077

Land at the rear of Home Farm, Dunstable Road, Tilsworth, Leighton Buzzard LU7 9PU

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended. The appeal is made by Mr Bernard McDonagh against an enforcement notice issued by Central Bedfordshire Council.
- The notice was issued on 12 September 2023.
- The breach of planning control as alleged in the notice is the unauthorised operational development, comprising of the scraping and removing of the soil from the Land and the importation of soil and hardcore onto the Land to create a raised hardstanding for caravans for residential use, construction of the timber sheds and siting of portable buildings, creation of access road, installation of water supply piping and other associated development with the change of use.
- The requirements of the notice are to:
 - a) Remove the raised hardstanding, remove from the Land all imported materials used to create the hardstanding. Restore the ground levels to its former condition.
 - b) Take down the timber buildings and remove them from the Land.
 - c) Remove the portables buildings from the Land.
 - d) Remove the access road, water supply piping and other associated development with the change of use and restore the Land to its former condition.
- The period for compliance with the requirements is 6 months.
- The appeal is proceeding on the grounds set out in section 174(2)(a), (g) of the Town and Country Planning Act 1990 as amended. 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.

Decisions

Appeal A

1. It is directed that the enforcement notice is corrected by:
 - The deletion of requirement d).
2. And varied by
 - Deleting '4' and substituting with '8' in the period for compliance.
3. Subject to the correction and the 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 1990 Act as amended.

Appeal B

4. It is directed that the enforcement notice is corrected by:
 - deleting 'sitting' and substituting with 'siting' in the alleged breach of planning control.
5. And varied by
 - Deleting '6' and substituting with '10' in the period for compliance.
6. Subject to the correction and the 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 1990 Act as amended.

Preliminary Matters

7. The evidence indicates that the occupiers of the site are Gypsies or Travellers and I have dealt with the appeals on that basis. It is therefore likely that they have the protected characteristic of race under s149(7) of the Equality Act 2010. I have a duty to consider the three aims of the Public Sector Equality Duty (PSED) as part of my decision. If I dismiss the appeals this is likely to have negative consequences for the families, in particular in terms of the aim to advance equality of opportunity and foster good relations.
8. The operational development the subject of Appeal B was necessary in order to facilitate the change of use alleged in Appeal A. As the two appeals are closely related to each other I have dealt with them together except where stated.
9. The parties agreed that the site contains five pitches, with each pitch occupied or intended to be occupied by a family group. There are familial connections between the family groups.
10. A planning application¹ for the change of use of the land for the formation of 5 pitches, formation of access road and wildflower meadow, was refused in December 2023. A temporary stop notice (TSN) was served on 15 August 2023 in relation to operational development comprising of the scraping and removing of the soil from the land, create hardstanding for caravans for residential use, and the siting of caravans for residential use. A High Court injunction has been

¹ Ref CB/23/02628/FULL

confirmed to prevent further development or stationing of caravans, the changing of caravans or additional occupiers.

Matters concerning the notices

11. In relation to Appeal A, the requirements of the notice are to restore the site to its previous use as agricultural land. However, in order to remedy the alleged breach of planning control it is sufficient to require the use to cease and all caravans and other items to be removed. It is excessive to require an agricultural use of the land to be resumed. No injustice would be caused to the parties if I delete requirement d).
12. I shall correct the wording in the banner heading for Appeal B as it was agreed that the use of the word 'sitting' is a typographical error and it should be 'siting'. No injustice would be caused.

Appeals A and B on ground (a) and the deemed planning applications

13. The ground of appeal is that planning permission should be granted for the alleged breaches of planning control. Having regard to the reasons for issuing the notices, the main issues are therefore as follows:
 - Whether the development is inappropriate development in the Green Belt.
 - The effect of the development on the openness of the Green Belt and Green Belt purposes.
 - The effect of the development on the character and appearance of the area.
 - The effect of the development on the integrity of the Chiltern Beechwood Special Area of Conservation (SAC) which includes Ashridge Common Site of Special Scientific Interest (SSSI) **(Appeal A only)**.
 - The general need for and supply of gypsy and traveller sites in the area **(Appeal A only)**.
 - The accommodation needs of the occupiers and their personal circumstances **(Appeal A only)**.
 - The weight to be given to other identified considerations.
 - Planning and Green Belt balance.

Whether inappropriate development

14. Having regard to the Planning Policy for Traveller Sites (updated December 2023) (PPTS) Policy E, the parties agree that the use of the land as a residential gypsy and traveller site is inappropriate development in the Green Belt and I have no reason to disagree.
15. The operational development includes the siting of portable buildings and construction of timber sheds, as well as engineering works to create the raised hardstanding, access road and other associated development. Paragraph 154 of the National Planning Policy Framework (NPPF) sets out the circumstances in which new buildings are not inappropriate development in the Green Belt. I have not been advised that any of those circumstances apply and I find that

the timber sheds and portable buildings are inappropriate development in the Green Belt.

16. Engineering operations are not inappropriate, where they preserve openness and do not conflict with the purposes of including land within the Green Belt. Prior to the development taking place, the site was an area of grassland with no buildings. I heard there were some vehicles, hardcore and broken ground on the site but there was no built form and the parties agreed that the land was not previously developed.
17. The engineering operations have changed the levels and created large areas of flat hardstanding on the sloping site and the access road. These elements have introduced new landforms into an area that was previously open with natural ground levels. They have therefore reduced the openness of the Green Belt in spatial terms. This is apparent in close views from the public footpath that crosses Tilsworth Golf Course, and in longer distance views from a public footpath to the south, so that there is a visual aspect to the reduction in openness. They represent an encroachment of development into the countryside and therefore conflict with the associated purpose. The buildings and engineering operations which are the subject of Appeal B are therefore inappropriate development.

Green belt openness and purposes

18. The NPPF states that one of the essential characteristics of the Green Belt is its openness, and its purposes include safeguarding the countryside from encroachment. I have already concluded that the operational development is harmful to openness and conflicts with one of the Green Belt purposes.
19. The change of use has resulted in the stationing of caravans on the site and associated domestic paraphernalia, parked vehicles etc. which have reduced the openness of the Green Belt in spatial terms. The loss of openness also has a visual aspect due to the visibility of the caravans, vehicles and domestic paraphernalia in views from the public right of way network.
20. The site is not on the edge of a settlement and represents an encroachment into the countryside. It therefore conflicts with the related Green Belt purpose.

Character and appearance

21. The appeal site is located in a rural area, separated from the small village of Tilsworth by open fields. It is towards the base of a hill which rises to the northwest with Tilsworth Golf Course. Although the site was previously untidy, it has not been argued that the appearance of the site detracted from the landscape or visual amenity of the area.
22. The site is within a low-lying agricultural landscape providing distant views, bordered by clay hills to the north which give long views to the south. The area is generally an intensive agricultural landscape but with small pockets of pasture, especially near settlements. The site is close to the small village of Tilsworth and being a small area of former pasture, it is consistent with this characterisation. The northwestern part of the site is visible from the golf course, which is crossed by a public footpath. There are long views across the valley from low lying land to the south, from where the upper part of the site is visible from a public footpath.

23. The operational development has resulted in the loss of a large part of the grassland and replaced it with a levelled terrace of land towards the more elevated and visually prominent end of the site. This has been harmful to the appearance of the site. The caravans and associated vehicles, fences and hard surfacing are apparent in views from the surrounding area, particularly from the golf course and in views across the valley to the south. The developments appear as discordant features in the rural area that detract from its distinctive character. While the site is seen within the context of the neighbouring gypsy and traveller sites at Home Farm, the Evergreens and Kingswood Nursery, it appears as a substantial incursion into open countryside, that adds to the effects on the landscape from the adjacent developments.
24. Appropriate planting and alterations to the site layout could mitigate the visual and landscape effects of the developments to some extent and could be secured through conditions, but the residual harm would remain due to the relatively open landscape and visibility of the site. Due to the relatively small scale of the development, I consider the harm to be moderate.

I therefore find that the developments are harmful to the character and appearance of the site and surrounding area. They therefore conflict with Policies H7 and EE5 of the Central Bedfordshire Local Plan 2021 (CBLP), insofar as they seek to ensure that development respects, retains and enhances the character and distinctiveness of the local landscape, and that gypsy and traveller development does not detrimentally affect the character and appearance of the wider landscape.

Chiltern Beechwood SAC

25. The SAC was designated due to the importance of its habitats, namely beech forests, dry grasslands and scrubland on chalk or limestone, and the Stag Beetle. It represents the most extensive area of native beech woodland in England and extends for 1,276.5 hectares. The beech woods vary in composition and character. The grassland interest relates to species-rich chalk grassland. The Stag Beetle is the UK's largest terrestrial beetle and the larvae live in decaying tree stumps and fallen timber where these lie in contact with the ground. Population numbers are generally in decline across Europe.
26. The SAC is made up of nine component parts scattered across the Chilterns, one of which is Ashridge Commons SSSI. This is a very popular site for visitors and is largely accessible to the public free of charge. Natural England's (NE) letter of 14 March 2022 indicates that recreational pressure is causing a range of harmful effects on qualifying features through trampling of vegetation, soil compaction and erosion, contamination including nutrient enrichment through dog fouling and litter, increased incidence and risk of fire, and other impacts such as harvesting and site management.
27. Research carried out on behalf of Dacorum Borough Council² has indicated that increasing residential development is likely to result in additional effects from people using the SAC for recreational. Based on survey data a Zone of Influence (ZOI) was derived, within which new residential development would be expected to result in increased recreational pressure on the SAC. The ZOI

² Visitor survey, recreational impact assessment and mitigation requirements for the Chiltern Beechwoods SAC prepared by Footprint Ecology for Dacorum Borough Council and published in March 2022 referred to in Chilterns Beechwoods Special Area of Conservation Mitigation Strategy for Ashridge Commons and Woods Site of Special Scientific Interest.

includes land within the Council area. Within the ZOI, likely significant effects on the qualifying features from new residential development, whether alone or in combination with other plans or projects, cannot be ruled out, giving rise to the need for an Appropriate Assessment (AA) under the Habitats Regulations³. The AA is necessary to establish whether there would be adverse effects on the integrity of the features of the European site and if there are, whether they could be modified through mitigation.

28. The change of use has resulted in an increase in residential development within the ZOI through the addition of 5 pitches, each accommodating a household. The additional households are likely to give rise to trips to Ashridge Commons SSSI for recreation. In combination with other residential development within the ZOI the development is likely to result in additional recreational pressure which will have harmful effects on the beech woodlands in the SSSI, a qualifying feature of the SAC.
29. A Mitigation Strategy⁴ (MS) has been developed by the councils that are affected by the ZOI and has been adopted by this Council. It sets out mitigation for the harmful effects on the SAC caused by additional residential development. Residential development includes Gypsy and Traveller Pitches, whether temporary or permanent. The MS sets out a scheme of financial contributions towards a Strategic Access Management and Monitoring Strategy (SAMM) which are on-site mitigation measures. and the provision of Suitable Alternative Natural Green Space (SANG). These are strategic mitigation measures to enable it to be ascertained that the development would not adversely affect the integrity of the SAC, so that its conservation status would be maintained.
30. The appellant has submitted a draft Unilateral Undertaking (UU) to seek to secure the financial contributions towards the SAMM and SANG as set out in the MS. However, despite additional time being permitted for the UU to be signed and executed as a deed, it was not submitted within the agreed timescale. Furthermore, there are several parties to the UU but only one of them is listed as the legal owner of the site. The others are listed as occupiers and the nature of their interest in the site is not clear. I am not satisfied therefore that the UU would secure the necessary financial contributions. I cannot therefore conclude that the development, in combination with other plans and projects, would not have adverse effects on the integrity of the European site. I can only grant permission if there are no alternative solutions or if there are imperative reasons of overriding public interests (IROPI) and compensatory measures. I have not been advised that any of these circumstances apply.
31. In the absence of appropriate avoidance or mitigation measures and applying the precautionary principle, adverse effects on the integrity of the SAC cannot be excluded, permission can only be granted if the remaining tests in the Habitats Regulations can be met. As set out above, there is no evidence that there are no alternative solutions or that IROPI applies. The development therefore conflicts with the Habitats Regulations. It is also in conflict with CBLP Policy EE3, insofar as it seeks to ensure that development does not have an adverse effect on European designated sites, and section 15 of the NPPF.

³ Conservation of Habitats and Species Regulations 2017 as amended

⁴ Chilterns Beechwoods Special Area of Conservation Mitigation Strategy for Ashridge Commons and Woods Site of Special Scientific Interest

Supply of sites

32. The PPTS states that local planning authorities should set pitch targets for gypsies and travellers which address the likely permanent and transit site accommodation needs of travellers in their area. A supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets should be identified and updated annually. Policy H of the PPTS states that decision makers should consider the existing level of local provision and need for sites, the availability of alternative accommodation and personal circumstances.
33. The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) which was published in 2016 to support the emerging CBLP. It identified a need for 23 pitches for the period 2015-2035 with a further 48 pitches to be delivered through a criteria-based policy. 74 pitches have now been approved and on that basis the Council is of the view that there is an oversupply of pitches against the locally set target.
34. Since the GTAA 2016 was published, the definition of gypsy and traveller has been amended in the PPTS to include those who have ceased to travel permanently on the grounds of their own or their family's or dependants' educational or health needs or old age. The Council has reviewed the need based on the 2023 definition. On the basis that 13% of the unknown households meet the definition (6 households), and that 13 households that did not meet the 2015 definition meet the new definition and generate a need for 5 pitches, the revised need is estimated at 34 pitches (23 + 6 + 5). In view of the number of pitches that have been approved, there is still an oversupply of pitches. 49 of the 74 pitches that have been permitted were for pitches that meet the 2015 PPTS definition of gypsy and traveller.
35. The appellant has questioned the GTAA methodology, in particular the number of households that were undetermined in 2016, citing a low rate of interviews with those whose status was unknown, indicating that estimates on concealed and emerging households may have been undercounted. However, the methodology was considered acceptable for the local plan examination. Nonetheless, the GTAA is now 8 years old. By the Council's own admission, it is no longer up to date and a review is under way.
36. The appellant's view is that the only reliable indicator of need is to include the need from the unknown householders, the non-traveller households, and the households who met the 2015 definition, as the interview rate was too low and it is therefore not possible to say with any certainty how many households meet the 2023 definition. If this approach were taken and taking into account the 74 pitches that have received planning permission, there would be a residual need of 94 pitches.
37. While this may be an overestimate as it assumes all those households meet the 2023 definition, it is clear that there has been an expansion of need in the area, with the caravan count having risen from 490 in 2016 to 610 in July 2023. Taking into account the age of the GTAA and the large percentage of households who were either unknown or did not meet the 2015 definition, I consider that there is sufficient uncertainty to cast doubt on whether the Council has a 5-year supply of specific deliverable sites. The Council estimates that it is likely to have a replacement local plan in place within the next 5

years. It is therefore unlikely that any additional pitches will be allocated for development for the next few years.

38. The Council has identified a number of vacant pitches in the area, that it considered to be alternatives for the occupiers of the site. In order to be a genuine or realistic alternative they must be suitable, acceptable, affordable, and available sites for the occupiers to move to if their appeal is not successful.
39. The occupiers of the pitches on the appeal site explained with reference to each potentially vacant pitch why none were either available, acceptable, or suitable for them. I have no reason to doubt that the suggested pitches are not realistic alternatives to the appeal site. Furthermore, the occupiers were not in a position to purchase alternative land.
40. It is for the decision-maker to attribute such weight to the unmet need as is considered appropriate in the given circumstances. In this particular case, the absence of a five-year supply warrants significant weight in the light of the appreciable deficit in supply and with the shortfall unlikely to be remedied until the new Local Plan is in place. I also give weight to the lack of alternative sites.

Personal circumstances

41. The site comprises five pitches. Each pitch is occupied by a family group which include children. Some of the children are registered as attending local schools. Others are too young but the evidence indicates that they would be enrolled at local schools when they are old enough. The written evidence was supplemented by oral statements.
42. Some of the households were previously living a roadside existence or were living with other members of their families, or 'doubling up' on other sites. They do not wish to live in 'bricks and mortar' but wish to bring up their children in the traditional gypsy/traveller way. The development allows the five households to provide each other with mutual support and assistance. Several of the occupiers suffer from health issues, which have improved due to the stability and security of having a settled base and the support of other members of their extended family close by. They are enrolled at local doctors' surgeries and are accessing health care as needed.
43. The children are generally enrolled at local schools and are benefitting from having a settled base. If they lose their settled base they risk being unable to maintain their connections to and places within the local schools and facilities which would have a harmful impact on the families, especially the children.
44. It could reasonably be expected that it would be in the best interests of the children to remain on site so that they can continue to access education without interruption. There are also health care benefits for the children and the others in the household. I also accept that the site allows the families to live close to each other, in a way that is conducive to gypsy culture, and provide mutual support. If the appeal is dismissed the likelihood is that the families would lose their homes on the site. There is a probability that this would be disruptive to family life, education of the children and access to healthcare. If no alternative sites have been identified, it may be that the families have to rely on a roadside existence, or 'doubling up' on other sites, resulting in cramped conditions. The families are more likely to be able to access healthcare and education from a settled base. It is also not in the public

interest to have families living on the roadside or in cramped conditions. I give weight to the personal circumstances of the occupiers of the site.

Other considerations

45. A Written Ministerial Statement (WMS) dating from August 2015 establishes that intentional unauthorised development (IUD) is a material consideration to be weighed in the determination of applications and appeals. An application for planning permission was made a short period after moving onto the site. It was therefore clear that the appellants were aware of the need for planning permission but did not intend for the development to be unauthorised. An injunction has been granted, indicating that there was considered to be a significant risk of further breaches taking place. The site has been levelled to create pitches and fenced, with an access road being formed and utilities provided. The works are reversible and I note that no trees have been removed.
46. The appeals on ground (a) provides an opportunity to mitigate the impact of the development through the use of planning conditions. I am also mindful that planning enforcement is remedial rather than punitive. I attach limited weight therefore to the IUD that has taken place.

Planning and Green Belt balance

Appeal A

47. Adverse effects on the integrity of a European Site (the SAC) cannot be excluded, consent can only be granted if the remaining tests in the Habitats Regulations can be met. There is no evidence that the remaining tests can be met in this case. This on its own is sufficient for me to conclude that the development is unacceptable.
48. Paragraph 16 of the PPTS sets out that inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.
49. Paragraph 27 of the PPTS makes clear that if a local planning authority cannot demonstrate an up-to-date five-year supply of deliverable sites, this should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission. The exception is where the proposal is on land designated as Green Belt.
50. The development is inappropriate and is therefore harmful to the Green Belt by definition. There is also moderate harm to openness and the purposes of including land in the Green Belt. I give substantial weight to the Green Belt harm. There is also moderate harm to the character and appearance of the area and the limited weight to the IUD. To be weighed against this is the need for sites, the lack of alternative sites for the occupiers to move onto, their personal circumstances. I give each of these considerations significant weight. However, in view of the conflict with the Habitats Regulations, even if I found that these considerations clearly outweigh the harm to the Green Belt by reason of inappropriateness, and the other harm resulting from the development, I cannot grant planning permission.

51. I have considered whether a temporary permission would make the development acceptable. A five-year temporary permission would allow for a Local Plan to be adopted with allocations for gypsy and traveller sites if needed. However, a temporary permission would allow the adverse effects on the integrity of the SAC to continue and would not therefore overcome the conflict with the Habitats Regulations. A personal permission would not overcome the conflict with the Habitats Regulations.
52. The refusal of permission would be an interference with the rights of the families that occupy the site to respect for their home and family life. The interference would have consequences of sufficient gravity as to engage the operation of Article 8 of the European Convention on Human Rights. The right to respect for home and private life is a qualified right, whereby interference may be justified in the public interest, but the concept of proportionality is crucial. The best interests of the child is a primary consideration but they are not determinative. The interference would be in accordance with the law and in pursuance of a legitimate aim: the protection of the SAC. Given the circumstances overall, I conclude that a refusal of planning permission would be proportionate and necessary. This outcome would not violate the families' rights under Article 8. The protection of the public interest cannot be achieved by means that are less interfering of their rights.
53. In relation to the PSED, due regard has been had to the effects of the decision on the occupiers of the site, insofar as they are different to those without a relevant protected characteristic. Although the appeal is to be dismissed, these considerations have been at the forefront of the decision-making process. The outcome is a proportionate one.

Appeal B

54. The works that are the subject of Appeal B are required to facilitate the change of use. They are inappropriate development that causes harm to the openness of the Green Belt and conflict with a Green Belt purpose. They are also harmful to the character and appearance of the area. If Appeal A does not succeed, it follows that there are no considerations that could clearly outweigh the harm to the Green Belt and any other harm, such that I could allow Appeal B.

The appeals on ground (g)

55. The ground of appeal is that the periods for compliance with the notices fall short of what should reasonably be allowed. The periods for compliance are 4 months for the change of use (Appeal A) and 6 months for the operational development (Appeal B). The appellant has requested a period of 12 months for both of the notices, as there are no alternative sites available, and the occupiers have demonstrable personal needs for accommodation which has no prospect of being met elsewhere in the immediate future.
56. It seems to me that it would be reasonable and proportionate to allow a period of 8 months for the use to cease as this would give the occupiers and the appellant additional time to seek alternative solutions or arrangements. It follows that 10 months is a reasonable period for the operational development to be removed, following the cessation of the residential use. To this limited extent the appeals on ground (g) succeed.

Conclusion

57. For the reasons give above, I conclude that the appeals should not succeed. I shall uphold the enforcement notices with corrections and variations and refuse to grant planning permission on the applications deemed to have been made under section 177(5) of the 1990 Act as amended.

N Thomas

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Mr Alan Masters

Mr Brian Woods – WSP

Interested parties - some of the occupiers of the pitches

FOR THE LOCAL PLANNING AUTHORITY:

Jack Smyth of Counsel instructed by Ed Telepneff (Solicitor for the Council)

Phillip Hughes BA (Hons) MRTPI FRGS Dip Man MCIM Planning Consultant

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David Hale BSc (Hons) Dip TP MRTPI Gypsy and Traveller Planning Manager CBC

Lauren Witherick (Rance) Senior Planning Officer CBC

Carol Newell Landscape Architect BA (Hons) Dip LA CMLI CBC

DOCUMENTS

Submitted to the Hearing by the Appellant

1. Appeal Decisions reference APP/P0240/W/20/3258835 and APP/P0240/C/21/3285140 Land to the north of Eversholt Beeches

Submitted to the Hearing by the local planning authority

2. Email regarding school registrations
3. Summary of ORS figures
4. Schedule of suggested conditions

Submitted after the Hearing by the Appellant

5. Final draft of Unilateral Undertaking