



Appeal Decisions

Hearing held on 6 August 2024

Site visit made on 6 August 2024

by Helen O'Connor LLB MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 14 August 2024

Appeal A Ref: APP/Y3615/W/24/3342386

Greyfriars, Hogs Back, Guildford, Surrey GU3 1AD

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
- The appeal is made by Libby Iddles against the decision of Guildford Borough Council.
- The application Ref is 22/P/00935.
- The development proposed is the demolition of existing extensions to Greyfriars and outbuildings and the erection of a detached four bedroom dwelling.

Appeal B Ref: APP/Y3615/Y/24/3342387

Greyfriars, Hogs Back, Guildford, Surrey GU3 1AD

- The appeal is made under section 20 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) against a refusal to grant listed building consent.
- The appeal is made by Libby Iddles against the decision of Guildford Borough Council.
- The application Ref is 22/P/00936.
- The works proposed are the demolition of existing extensions to Greyfriars and outbuildings and the erection of a detached four bedroom dwelling.

Decisions

1. Appeal A is dismissed.
2. Appeal B is allowed and listed building consent is granted for the demolition of existing extensions to Greyfriars and outbuildings at Greyfriars, Hogs Back, Guildford, Surrey GU3 1AD in accordance with the terms of the application Ref 22/P/00936 and the plans submitted with it (excluding drawing 112/177/10a) subject to the following conditions:
 - 1) The works hereby permitted shall begin not later than 3 years from the date of this decision.
 - 2) Prior to the commencement of the demolition of the buildings identified for demolition on drawing number 112/177/8 received 8th June 2022, a detailed methodology for all the works of making good to the retained fabric of the listed building shall be submitted to the local planning authority and approved in writing. Thereafter, the works shall be carried out in accordance with the approved details.

Preliminary Matters

3. Section 7 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) requires authorisation for *'any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest'*. At the

hearing it was agreed that the description of works on the appeal form and decision notice for Appeal B was too wide, and that the reference to the erection of a new dwelling fell outside the remit of works controlled by the Act. Hence, it was agreed that the description of the works for Appeal B should be for 'the demolition of existing extensions to Greyfriars and outbuildings' omitting the reference to the new dwelling. As such, drawing number 112/177/10a (Plans and Elevations of the Proposed House Design) does not form part of Appeal B.

4. As a consequence of this clarification, the Council conceded during the course of the hearing that the refusal reason for Appeal B fell away as they had no objection to the works of demolition proposed.
5. In relation to Appeal A, the appellant provided an updated questionnaire on climate change, energy and sustainable development¹ which the Council confirmed addressed their concerns in those respects. Hence, refusal reason 7 on the Council's decision notice for Appeal A falls away.
6. During the hearing, a draft Unilateral Undertaking (UU) pursuant to section 106 of the Town and Country Planning Act 1990 was submitted and discussed. Following the closure of the hearing, a completed UU dated 7 August 2024 was submitted by the appellant. The document contains obligations to pay financial contributions upon the completion of the deed in relation to mitigation measures for the Thames Basin Heaths Special Protection Area (SPA). These equate to £10,119.42 towards the provision of Suitable Alternative Natural Greenspace (SANG) and £1,347.92 towards Strategic Access Management and Monitoring (SAMM). The Council's views on the completed UU were sought in writing and they did not dispute its contents. On that basis I am satisfied that no one would be prejudiced by my taking the UU into account.

Main Issues

7. The main issues are:

- Whether the proposed development is inappropriate development in the Green Belt, and if so, the effect on openness (Appeal A).
- The effect on the significance and special interest of Greyfriars a Grade II* listed building (Appeals A & B).
- The effect on the character and appearance of the area, including consideration of the Surrey Hills National Landscape (SHNL) and trees (Appeal A).
- The effect on the Monkhatch Site of Nature Conservation Interest (SNCI) and protected species (Appeal A).
- The effect on the SPA (Appeal A), and;
- Whether any harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations, so as to amount to the very special circumstances required to justify the proposals (Appeal A).

¹ Appendix 5, Appellant's Appeal Statement

Reasons

Whether inappropriate development in the Green Belt and openness

8. The main parties agree that the proposal to construct a new dwelling would represent inappropriate development in the Green Belt as defined in the current National Planning Policy Framework (the Framework) and the development plan, and I see no reason to disagree with that analysis.
9. At the hearing, my attention was drawn to proposed changes to national Green Belt policy in the recent consultation on proposed reforms to the Framework. The appellant contends that future government policy would allow greater flexibility for development in the Green Belt, such that the proposed new dwelling may fall within a permitted exception. Nevertheless, the proposed reforms are draft and may be subject to change before the final document is published. Whilst indicative of the likely direction of policy, they do not yet constitute government policy or guidance, and so I have attributed this factor limited weight. As such, it is insufficient to outweigh the strength of current national and local policy which indicate that the erection of the proposed dwelling would be inappropriate development in the Green Belt.
10. The Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of Green Belts are their openness and their permanence. Planning Practice Guidance (PPG) advises that openness is capable of having both spatial and visual aspects.
11. I observed the parcel of land where the new dwelling is proposed to have an open, spacious character where greenery and natural features prevail. It is devoid of built form and reads as part of the generous grounds to Greyfriars. Whilst I noted a nearby small cottage, and larger rural commercial buildings within the wider vicinity, the presence of built form was not a dominant factor, and it did not inhibit the spacious open qualities of the appeal site.
12. The proposed detached, two-storey, four bedroom dwelling would constitute a large house with a commensurate amount of volume and bulk. The introduction of the sizeable structure onto the land would inevitably be a dramatic change in spatial terms that would markedly erode the openness of this part of the Green Belt.
13. In addition, visual harm to openness would result from the presence of the generous area of hardstanding and consequent parked vehicles, likely domestic paraphernalia within the grounds of the dwelling, incidents of lighting and increased activity. Whilst I accept that mature trees, general vegetation and the topography of land around the site would provide some visual containment, it would not negate the presence of the dwelling altogether, and some glimpses of it would be possible from the private lane.
14. The proposals include the demolition of a squash court building, shed, stores, garage and greenhouse at Greyfriars. The reduction of this built form would increase openness at the eastern end of the main dwelling. The appellant contends that there would be a 'transfer' of volume within the Green Belt that would off-set the effect of the new dwelling on the openness of the Green Belt.

15. However, given the unique nature of land, I am not persuaded that such a transactional approach would be successful. The site of the demolition provides a different context to the proposed site of the new dwelling. Greyfriars is an existing substantial building, and the elements to be removed are comparatively minor in scale and in a concentrated area directly adjacent to the large house. Whilst beneficial, their removal would not have as dramatic an impact on openness as the introduction of the substantial house on an area partly characterised by the absence of built form. Moreover, given the distance from Greyfriars, there would be a greater distribution of built volume across the grounds, which would exacerbate the harm to openness.
16. Therefore, notwithstanding the comparative volume, floorspace and footprint figures for the respective demolition and new dwelling, I find that overall, the new dwelling would constitute inappropriate development that would cause a moderate degree of harm to the openness of the Green Belt. Paragraph 153 of the Framework stipulates that this weighs substantially against the proposals.

Listed building

17. Greyfriars is an impressive, detached country house set in generous wider grounds commissioned by Julian Sturgis, a notable novelist. Designed by Charles Voysey at the end of the 19th century, it is considered to be the masterpiece of the renowned Arts and Crafts architect. The house is constructed in whitewashed roughcast with smooth ashlar dressings, hipped slate roof and amongst other things features leaded casement dormers, stone dressed leaded casement fenestration, multiple ridge stacks and large battering buttresses. The distinctive aesthetic form and style of the building have considerable architectural and historical importance, which is reflected in its Grade II* listing.
18. An important part of Voysey's design is the setting of the building and its relationship with the landscape. The linear form of the dwelling broadly corresponds to the shape of the former chalkpit and responds to the ridge of the Hogs Back allowing for panoramic far-reaching views to the south. Moreover, the generous and spacious grounds associated with the main house, together with the entrance lodge, former stable block and cottage contribute towards the country house motif redolent of a rural estate.
19. At the hearing it was explained that former parts of the grounds, such as the kitchen garden, were no longer part of Greyfriars, and that some of the retained grounds have become overgrown. Nevertheless, I observed that various elements are still discernible within the remaining grounds. This includes formal terrace gardens to the west of Greyfriars, designed by Herbert Baker in the early 20th century. Sets of stone steps down the dramatic slopes lead to more informal wooded areas, and a tennis court south-west of the house provides a recreational area.
20. Accordingly, the setting of Greyfriars plays an intrinsic role in its significance. Views to the wider landscape from the house and terraces are particularly important, but the spacious, green qualities of the lower grounds also hold some value. There is a contrast between the respective formal, naturalistic and recreational elements of the grounds that enhances how the aesthetic and architectural qualities of the country house are experienced. In combination, they provide some insight as to the likely social and economic status of the

- historic occupants of the house, and how they used the grounds for pleasure and recreation.
21. Sections 16 and 66 of the Act, require me to have special regard to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess.
 22. Both appeals propose to demolish later additions at the eastern end of Greyfriars. The squash court, garage and outbuildings identified for demolition did not form part of the original Voysey design, and of themselves, possess little architectural merit. Their location means they are the first buildings encountered on approaching the house via the main driveway. Their secondary and ancillary appearance is at odds with this prominent positioning and means that they detract from the architectural consistency and quiet grandeur of the listed building. Moreover, the squash court building partly interrupts the panoramic views. Accordingly, their removal would be beneficial to the architectural quality of the listed building and would facilitate a greater appreciation of aspects of its special interest and significance.
 23. It follows that in respect of the demolition works proposed for Appeal B, there would be no harm in this respect, and consequently there would be no conflict with the expectations of section 16 of the Act.
 24. In relation to Appeal A, the proposed new dwelling would be within the lower grounds of Greyfriars and sufficiently close to form part of the surroundings in which the heritage asset is experienced. Hence, I find that it forms part of the listed building's setting. The proposed site is presently devoid of built form, and has a naturalistic, spacious, and verdant character. Those qualities generally reinforce the rural setting and surrounding verdancy within which the main country house dominates. They further provide a contrast with the more formalised areas of terracing and adjacent tennis court. As an integral part of the wider lower grounds, the site makes a small but positive contribution to the setting of the listed building, which in turn forms part of its significance.
 25. The proposal would subdivide a parcel of land from Greyfriars to create a separate dwelling, ostensibly unconnected with the main house or configuration of the wider estate. The presence of a large, detached house, with a separate domestic curtilage, associated parking and paraphernalia would be detrimental to the spacious and open qualities of the grounds. Although the design concept is broadly vernacular in style, there is very little in the proposed location, scale or appearance of the dwelling that would better reveal or reinforce the historic significance of Greyfriars. As such, it would read as an incongruous incursion that would harmfully erode the country house character of Greyfriars and its grounds. Consequently, it would undermine the significance of the listed building.
 26. The appellant emphasises the lack of intervisibility between Greyfriars and the proposed location of the dwelling, largely owing to differences in levels and the presence of mature trees. Nevertheless, for the reasons outlined above, I consider that the area still forms part of the setting of the listed building, which in turn forms a component of its heritage value. Whilst the lack of intervisibility is a factor that would limit the degree of harm to the overall heritage value of Greyfriars, it would not negate it altogether.

27. In coming to my findings, I have also taken account of the comments from Historic England². The appellants point out the absence of an in principle objection. Be that as it may, they clearly articulate that the proposed dwelling would cause harm to the historic open character to part of the mansion's grounds. Therefore, their comments generally reinforce my findings.
28. Consequently, the proposed new dwelling in Appeal A would run counter to the expectations of section 66 of the Act. Furthermore, in the terms of the Framework, there would be less than substantial harm caused to the significance of a designated heritage asset. In these circumstances, paragraph 208 of the Framework states that this harm should be weighed against the public benefits of the proposal.
29. There would be a heritage benefit arising from the demolition of buildings that detract from Greyfriars. This represents a public benefit, but given the relatively modest nature of the improvement, it attracts a moderate degree of favourable weight. In addition, there would be a small amount of benefit from the provision of an additional dwelling to the overall housing mix and supply, and the associated economic benefits arising from its construction. It was suggested at the hearing that financial benefits accruing from the new dwelling could assist in maintaining Greyfriars. However, in the absence of any mechanism to secure this, this is a matter that attracts little weight. Therefore, cumulatively, I find there are public benefits of moderate weight.
30. Paragraph 205 of the Framework states that great weight should be given to the conservation of designated heritage assets, and that the more important the asset the greater the weight should be. In this case, the harm would be to a Grade II* listed building, which denotes its particular importance. Hence, the sum of public benefits is insufficient to outweigh the identified harm in this respect. As such, the proposals in Appeal A would conflict with national policies contained in the Framework that seek to protect the historic environment.
31. In addition, the development in Appeal A would conflict with policy D3 of the Guildford Borough Local Plan: Strategy and Sites 2015-2034, April 2019 (GBLP) and policies D18 and D19 of the Guildford Borough Local Plan: Development Management Policies, March 2023 (DMP). Amongst other things, these policies seek to conserve and enhance the historic environment, and designated heritage assets in particular.
32. Accordingly, I find that the development in Appeal A would have an unjustifiably harmful effect on the significance and special interest of a Grade II* listed building. This would be contrary to the Act and local and national planning heritage policies. However, the more limited remit of the works under consideration in Appeal B, means that they would not cause harm but would rather be beneficial. Therefore, there is no basis to resist the works proposed in Appeal B.

Character and appearance, SHNL and trees

33. Factors that contribute to the special interest of Greyfriars as a heritage asset are also relevant to the character and appearance of the area. Hence, there is some crossover with the second main issue. In summary, the attributes of the large, architecturally important country house set in verdant grounds below an

² Letter dated 18.5.23

elongated ridge, with vistas reaching into the wider landscape, are all fundamental components. Although there are some other buildings in the vicinity, the settlement pattern is generally dispersed, and in the case of larger structures, they mostly appear as former rural or agricultural buildings. Consequently, there is a distinctive countryside character and appearance to the area, in part derived from a strong association with Greyfriars.

34. The site lies within the designated SHNL. The Surrey Hills AONB Management Plan 2020-2025 describes³ the special qualities of the SHNL as including a landscape mosaic of farmland, woodland, heaths, downs and commons that has inspired some of the country's greatest artists, writers and architects over the centuries. Section 85 of the Countryside and Rights of Way Act 2000 (as amended) sets out a general duty whereby I must seek to further the purpose of conserving and enhancing the natural beauty of the designated landscape. Paragraph 182 of the Framework confirms that great weight should be given to conserving and enhancing landscape and scenic beauty within such national landscapes.
35. Owing to the factors identified above, Greyfriars and its grounds make a valuable positive contribution to the SHNL and provide a fine example of a renowned architect's response to the landscape. The proposed site of the new dwelling has spacious and verdant qualities that reinforce positive aspects of the character and appearance of the area and SHNL. However, the site is largely visually contained by topography and trees such that it is not prominent in the wider landscape. Hence, it makes a minor contribution towards the special qualities of the SHNL.
36. The proposed demolition of unremarkable outbuildings to better reveal the quality of the architecture at Greyfriars would be a small improvement to the character and appearance of the area. Therefore, this aspect of the proposals would broadly accord with the statutory duty mentioned.
37. Even so, the proposals would also introduce a large house onto a parcel of land that presently has no built form and where natural features and vegetation prevail. This would harmfully undermine the spacious and verdant qualities of the site. Moreover, by further subdividing the historic wider grounds to create a separate domestic curtilage and dwelling, the proposal would dilute its distinctive countryside character and appearance.
38. The harm would be exacerbated by the scale and appearance of the dwelling. The design concept is broadly based on generic vernacular Surrey architecture of the early 20th century. However, the height, proportions and detailing of the building would have more in common with sub-urban architecture from that period rather than rural or historic development in the immediate environs. At the hearing, the appellant did not provide a convincing explanation of how the scale, siting and form of the dwelling would be sympathetic to the distinctive historic context. Rather, the approach relied upon avoiding pastiche architecture and taking advantage of an existing clearing in the woodland, topography and access. Consequently, whilst the design is inoffensive taken in the abstract, it would be discordant in this sensitive context and would fail to read as a well-grounded part of the historic Greyfriars estate.

³ Paragraph 2.2

39. Whilst mature trees would lie close to the boundaries of the area proposed for the new dwelling, I did not observe any notable specimens within the red lined area. The Council was unable to identify any specific trees which they considered would be harmed either within or adjacent to the site. The proposed dwelling would be set in from the edges of the site, such that there would be a reasonable separation distance between the structure and existing trees that lie outside of it. Hence, even though a tree survey has not been provided, I am satisfied that harm to tree roots arising from the position of the building would be unlikely. In these circumstances, a condition would be able to secure appropriate tree protection measures.
40. The Council raised general concerns that trees to the south adjacent to the lane would be vulnerable to removal or reduction as future occupiers of the dwelling would wish to increase light levels to the property. However, those trees lie outside of the appeal site and so would be unlikely to be within the direct control of future occupiers. I observed them to be of a moderate height, which when combined with the separation distance between the proposed property and garden would make it unlikely that the relationship would be problematic for light levels. Overall, I do not consider that the proposals would result in harm to trees and so would avoid conflict with the expectation to retain tree canopies contained in policy P7 of the DMP.
41. Even so, that would not surmount the harm that I have found in relation to this main issue. Ultimately, the effect of the development would be harmfully incongruous to the character and appearance of the area and would cause localised harm to the SHNL. As such, the development would be contrary to policies D1 and P1 of the GBLP and policy D4 of the DMP. In combination, and amongst other things, these policies seek a high quality of design that is sympathetic to the local context and conserves the scenic beauty of the SHNL.

SNCI and protected species

42. The site lies close to the SNCI, the ecological importance of which derives from a diversity of woodland, scrub and remnant calcareous grassland habitats as well as the connectivity it has within the landscape. Whilst some ecological information was submitted with Appeal A, the Preliminary Ecological Appraisal Report, Preliminary Roost Assessment, Bat Emergence Surveys and Mitigation Report, and Biodiversity Net Gain Report all state that they remain valid for 12 months. Given the time that has elapsed since they were prepared, they are all out of date.
43. Nevertheless, information contained within those reports indicated that bats were roosting in the main roof of Greyfriars, and that it is likely that the wider area provides suitable habitat for bats, slowworms, grass snakes, common lizards, great crested newts and badgers. Hence, there is a reasonable basis to suppose that the area for the proposed new house is used by a range of protected species.
44. It follows that as a result of the physical encroachment of the development, and its associated lighting and activity there would be a reasonable likelihood of harm to a habitat supporting a range of protected species. However, there is no up-to-date evidence to confirm this, and therefore, the scale of the harm is not identified.

45. It further follows that doubt remains as to whether appropriate safeguards are proposed, or are indeed possible, to adequately mitigate for the likely harm. This is not a matter that can be appropriately made the subject of a condition, as the principle of the development would have already been permitted. To do otherwise would conflict with advice⁴ in Circular 06/2005 Biodiversity and Geological Conservation which states that it is essential that the presence of protected species and the extent that they may be affected is established before any planning permission is granted.
46. PPG⁵ reinforces that planning authorities need to consider the potential impacts of development on protected and priority species, and the scope to avoid or mitigate any impacts when considering planning applications.
47. At the hearing, there was a consensus that mitigation measures in relation to the likely effects on the SNCI itself could be addressed by a planning condition, but this does not address my concerns in relation to protected species.
48. Accordingly, I find the development would be likely to have a harmful effect upon protected species contrary to policy ID4 of the GBLP and policy P7 of the DMP, which amongst other things, seek to maintain, conserve and enhance biodiversity.

SPA

49. The appeal site is located within 5km of the SPA, a habitat recognised under the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitat Regulations) as being of international importance for rare and vulnerable species of birds. In this case, the Woodlark, Dartford Warbler and Nightjar. Caselaw requires the decision maker, when considering the effect that a proposal may have on such a European Site, to consider mitigation within an Appropriate Assessment rather than at screening stage.
50. In the absence of mitigation measures and using a precautionary approach, given the proximity to the SPA it is reasonable to suppose that future residents of the proposed dwelling would potentially visit the SPA for recreational purposes and dog-walking. Intensification of such activities would be likely to cause disturbance to the birds and their habitat. As such, there is a risk of a significant effect on the internationally important interest features of the SPA.
51. The Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document, July 2017 (SPD) sets out the Council's strategic approach to mitigating the adverse effects of new housing development through two main avoidance measures, the provision of SANG and SAMM. These are funded by contributions from new development and secured by a legal agreement, with the proportionate rates set out in the SPD.
52. The submitted UU would provide financial contributions towards the provision of SANG and SAMM at a level required by the SPD. This would align with the requirements of policy P5 of the GBLP and saved policy NRM6 of The South East Plan, Regional Spatial Strategy for the South East, 2009 which seek to avoid adverse effects on the ecological integrity of the SPA. I am satisfied that the obligations meet the 3 tests in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended).

⁴ Paragraph 99

⁵ Paragraph 016 Reference ID: 8-016-20190721

53. In the absence of other significant concerns, it would have been necessary to consult Natural England under Regulation 63(3) of the Habitat Regulations and complete an Appropriate Assessment. However, given the harm found in relation to the other main issues, I consider this would be unnecessary as it is unlikely to be determinative to the outcome of the appeal. In the circumstances, I have treated this matter as a neutral factor in the overall balance for Appeal A.

Other considerations

54. In paragraph 5.13 of their appeal statement, the appellant outlines four factors that she contends would amount to very special circumstances. These are an enhancement of character of the listed building, an enhancement to landscape setting and national landscape, a reduction and transfer of overall built form and a fall-back position in relation to the habitable conversion of the squash court building.

55. It will be seen from my reasoning above that I do not agree that there would be an overall enhancement to the listed building. However, the demolition works would provide some heritage benefits. These works attract a moderate amount of weight in favour of the proposals.

56. Furthermore, I did not find that the proposals would enhance the landscape setting, special qualities of the national landscape or generally improve openness, rather the opposite. Hence, these are not factors that attract positive weight.

57. A certificate of lawfulness has been issued to confirm that the squash court could be used as ancillary residential accommodation to Greyfriars. Be that as it may, I am not convinced that in comparison to the proposed detached dwelling, such a prospect would result in greater harm to the openness of the Green Belt. It follows that the extinguishment of this fall-back position by the demolition of the squash court would not weigh in favour of allowing the proposal.

58. At the hearing, reference was made to the proposed new dwelling improving security at the site. However, there was little evidence that this had been particularly problematic in the past, nor that erecting a dwelling would be the only way to address such concerns. Hence, this factor attracts little weight.

Green Belt balance – Appeal A

59. The Framework states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 of the Framework confirms that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

60. The combined weight of the other considerations attracts moderate favourable weight. Even treating the effect on the SPA as a neutral factor, this is insufficient to outweigh the totality of the harm identified in relation to the Green Belt, the historic environment, the character and appearance of the area and national landscape and protected species.

61. Consequently, I find that the other considerations in this case do not clearly outweigh the harm that I have identified. Therefore, the very special circumstances necessary to justify the development do not exist.
62. Accordingly, the development would be contrary to policy P2 of the GBLP which seeks to protect the Green Belt from inappropriate development in accordance with the Framework.

Conditions – Appeal B

63. In the interests of certainty, a condition setting a time period for the commencement of works is imposed. In addition, as some of the demolition works relate to parts connected to the remainder of the listed building, a condition to require the agreement of details of making good following the demolition works is necessary.

Conclusions

64. For the reasons given above, Appeal A should be dismissed but Appeal B should be allowed.

Helen O'Connor

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Ben Mitchell, Planit Consulting
Janet Long, Planit Consulting
Libby Iddles, Appellant

FOR THE LOCAL PLANNING AUTHORITY:

Lisa Botha, Senior Planning Officer, Guildford Borough Council

INTERESTED PARTIES:

Sean French, Local Resident
Kerry Clark, Local Resident
Veronica Gates, Local Resident

DOCUMENTS SUBMITTED AT THE HEARING

1. Copy of Council's Appeal Statement with paragraph numbers inserted.
2. Draft version of Unilateral Undertaking.