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| **Order Decision** |
| Inquiry opened on 30 January 2024Site visit made on 31 January 2024 |
| **by A Spencer-Peet BSc(Hons) PGDip.LP Solicitor (Non Practicing)** |
| **an Inspector appointed by the Secretary of State for Environment, Food and Rural Affairs** |
| **Decision date: 28 March 2024** |

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| **Order Ref: ROW/3320453** |
| * This Order is made under Sections 257 and 261 of the Town and Country Planning Act 1990 (the 1990 Act) and is known as The Surrey County Council Public Footpath 53 Sunbury Temporary Diversion Order 2023.
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| * The Order is dated 14 February 2023 and proposes to divert the public right of way shown on the Order plan and described in the Order Schedule.
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| * There were 45 objections outstanding at the commencement of the Inquiry.
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| **Summary of Decision: The Order is confirmed subject to the modifications set out below in the Formal Decision.** |
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Procedural Matters

1. I made an unaccompanied visit to Public Footpath 53 Sunbury (Footpath 53) and to the surrounding area on 29 January 2024. A public Inquiry into the Order was held on 30 and 31 January 2024 at the 1st Chertsey Scout HQ, Staines Lane, Chertsey. On 31 January 2024, I made a visit to the development site at Watersplash Farm where I was accompanied by a number of Objectors to the Order, representatives of Surrey County Council and representatives of the Applicant for the Order.

**Background and the Main Issues**

1. The definitive line of Footpath 53 is recorded as running from Gaston Bridge Road, then through a gap in fencing via a small wooded area, then in an easterly direction around a field margin before turning in a south-southeast direction, across the field to the pedestrian footway on Fordbridge Road.
2. It is proposed that a section of Footpath 53, as shown between points A-B-C on the plan that accompanies the Order, be diverted for a stated period of time to enable mineral extraction to be carried out.
3. On 12 March 2020, Surrey County Council granted full planning permission, subject to planning conditions, for the proposed extraction of concreting aggregate from land at Watersplash Farm, together with the erection of infrastructure and provision of new access. The planning permission requires that the development be commenced no later than 5 years from the date of permission, that the extraction and transport of materials shall cease within 5 years, and that restoration of the development site be completed within 6 years from the date of commencement. Amongst other matters, the planning permission further requires that safeguards shall be maintained to protect persons using Footpath 53, and that the footpath will be reinstated to its original line within 3 months of the restoration of the development site.
4. The Order provides the diversion of a section of Footpath 53, as shown on the Order plan between points A-B-C (the existing footpath), onto a different alignment depicted by a pecked line shown on the Order plan between points A-C (the diversion route). Consequently, the section of Footpath 53 between point C on the Order plan and the termination point on Gaston Bridge Road, is unaffected by the proposed diversion.
5. The diversion route would run from the pedestrian footway on Fordbridge Road at point A on the Order plan in an east-northeast direction, before turning northeast around the buildings at Watersplash Farm. The diversion route would then run in a northwest direction and adjacent to the River Ash, crossing over a maintenance road which provides access to the eastern areas of the development site via a bailey bridge, before turning in a westerly direction and connecting with the unaffected section of Footpath 53 at point C on the Order plan.
6. Since the Order is made under section 257 of the 1990 Act, if I am to confirm the Order, I must be satisfied that it is necessary to divert the section of the footpath in question onto the alternative line to enable development to be carried out in accordance with the planning permission already approved. The procedure is only available if the consented works have not been substantially completed.
7. Furthermore, if I am to confirm the Order, section 261 of the 1990 Act requires that I must be satisfied that the diversion is required for the purpose of enabling minerals to be worked by surface working and that, after the minerals have been worked, the footpath can be reinstated to a condition not substantially less convenient to the public. The Order may provide for the diversion of the footpath during such period as may be prescribed by or under the Order and for its restoration at the expiration of that period.
8. In determining an Order of this kind, the merits of the development are not at issue when considering whether to confirm an Order. However, the grant of planning permission does not mean that a public right of way will automatically be diverted. When considering whether or not to confirm the Order, the disadvantages or loss likely to arise as a result of the diversion of the way to members of the public generally, or to persons whose properties adjoin or are near the existing highway, should be weighed against the advantages of the proposed Order. In addition to the above, in reaching my conclusions I have considered the requirements of the Equality Act 2010.

Reasons

***Whether it is necessary to divert Footpath 53 to enable development to be carried out***

1. As noted above, planning permission for the extraction of materials at Watersplash Farm, was granted by Surrey County Council in March 2020. For the purpose of this decision, this is the relevant planning permission, and which directly relates to the land crossed by the recorded alignment of Footpath 53.
2. On its definitive line, Footpath 53 runs directly across an area for where permission to extract the aggregate material has been granted. If the recorded alignment of Footpath 53 was to be preserved, then the material underneath the footpath, and under any buffer zone either side of the footpath that would be required in order to keep users and site operations separate, could not be excavated as envisaged by the planning permission.
3. From the evidence before me at the Inquiry, by not diverting the footpath in question, the amount of material that could not be excavated would be approximately 75,000 tonnes, representing approximately 6% of the total amount of minerals for which planning permission for extraction has been granted. Furthermore, the relevant planning permission includes provision of a haul road which will be frequently used by heavy goods vehicles, and which would cross over the definitive line of Footpath 53, giving rise to significant health and safety concerns for users in the event that this section of footpath is not diverted.
4. Orders cannot be made under the 1990 Act where the development that is to be accommodated by the diversion, is substantially complete. From observations made on my site visits, it was apparent that certain phases of the development had commenced as evidenced by the presence of fenced off areas, site cabins, heavy plant machinery and vehicles, and the construction of earth bunds. However, at the dates of my site visits, it appeared that no works had been started within the area of the site which is crossed by the definitive line of Footpath 53, and which remained open for public use.
5. For the above reasons, I am satisfied that the approved development has not yet been substantially completed and that the planning permission, under which the development would take place, could not be fully implemented if the footpath were to be retained on its existing definitive line. I am satisfied that the diversion is required for the purpose of enabling minerals to be worked by surface working. Consequently, I conclude that it is necessary to divert the footpath to enable the approved development to be carried out in full.

***The disadvantages or advantages of the proposed Order***

1. In a number of objections to the Order, concerns focused on the dissatisfaction with the change in the open nature of the area, the consequent change in the character of the footpath and the loss of views of open land obtained from it. Further objections have been raised which maintain that the historic alignment of the footpath would be lost, that the proposed diversion of the footpath would have an adverse effect on ecology and biodiversity, and that there would be a loss of connectivity to adjacent land that is open for public use.
2. I acknowledge the desire of many Objectors to retain the affected section of the existing footpath on what is maintained to be a long-standing alignment. However, there is no substantive evidence before me to suggest that there is any historical significance attached to the line of the existing footpath. As a temporary diversion, there would be no loss of recorded public rights of way. Furthermore, there would be no loss of connectivity given that there are no recorded public rights of way which provide connections, from the affected section of the existing footpath, to the adjacent land that is open for public use. In terms of the concerns raised in respect of the impact on ecology and biodiversity, those would have been matters considered by the Local Planning Authority (The LPA), in consultation with relevant organisations, at the planning application stage for the development.
3. I do not doubt that a footpath leading through a mineral extraction development site will not afford the same experience for users, when compared to a route through previously undeveloped land of more open character. However, concerns regarding the change in character and the loss of views would be as a result of the approved development rather than as a result of the proposed diversion. Whilst the diversion route may not provide the more open views of the surrounding area when compared to the route which has been historically available to the public, the decision to develop the site has already been made by the LPA. As noted above, it is not within my role, or within the scope of this decision, to revisit the approved planning permission.
4. Further to the above, whilst I acknowledge the concerns in respect of the effect on users of the diversion route with regards to dust and noise emanating from the development site, the development has been approved by the LPA. Consequently, even in the event that the alignment of the existing footpath was preserved, such concerns are likely to remain. Nonetheless, the operation of the mineral development site, and any required environmental controls relating to noise and dust, would have been a matter that would have been considered as part of determining the planning application. Again, in respect of this decision, it must be reiterated that the merits of the development are not at issue when considering whether to confirm the Order.
5. The Order as made provides that the affected section of Footpath 53, between points A-B-C, has an overall length of 355 metres, with the diversion route having an overall length of 725 metres. From observations made on my visit, the definitive line of Footpath 53 crosses over a field on an earth surface. Whilst noting that the field includes open unfenced areas of land beyond the line of the path, and that the DMS does not record a width for the affected section of the footpath, the earth surface appeared to provide a path of approximately 2 metres in width on the ground and which was available for use.
6. The diversion route would be more than twice the length when compared to the alignment of the affected section of the existing footpath. As confirmed at the Inquiry, whilst the majority of use of the existing footpath is recreational in nature, the route is also used by persons in order to commute or reach other particular destinations.
7. At the Inquiry, a representative on behalf of the Applicant confirmed that they had conducted an exercise which found that the time taken to walk the diversion route, was approximately five minutes longer when compared to the time taken to walk the affected section of the existing footpath. Whilst noting the objections regarding the additional length of the diversion route, at the Inquiry an Objector to the order as made, confirmed that they use Footpath 53 in order to commute, but that the additional length of the diversion route would not be the reason why they would abandon use of the footpath.
8. In terms of the additional time required to walk the diversion route when compared to the existing affected section of Footpath 53, it is likely that commuters would factor in such considerations when planning their journeys. As such, I do not find that the additional time taken would be a significant disadvantage for those who use the footpath to commute to a particular destination.
9. In consideration of the additional length when compared to the alignment of the existing footpath, I conclude that the increase in overall distance is unlikely to inconvenience some recreational users. In that regard whilst it could be said that other recreational users may find the diversion route advantageous given that it would offer such users a longer walk, there is equally the potential for some users to choose not to use this footpath but rather select another different walk within the area, that meets their particular wishes in terms of duration and length of their recreational walks. Consequently, there may be advantages and disadvantages associated with the additional length of the diversion route. I therefore conclude that the additional length of the diversion route is a matter that attracts neutral weight in the balance of considerations before me.
10. A substantial number of objections have been made regarding the duration of the proposed diversion as included within the Order as made. The Order provides that the affected section of Footpath 53 be temporarily diverted for a period of 25 years. Predominantly, the objections raise concerns that that diversion period is not necessary and does not reflect the length of time for which planning permission had been granted at the site for the excavation of minerals.
11. However, the Applicant for the diversion acknowledges that the proposed diverted route should be for the period necessary for the operational activities at the site to be completed. As such, the Applicant has suggested that a modification be made to the Order, and which would reduce the period of time for the diversion down from 25 years to 7 years.
12. As noted above, the relevant planning permission provides that the extraction and transport of materials, and the restoration of the development site shall be completed within 6 years of the date of commencement. The planning permission further requires that the footpath be reinstated to its original line within 3 months of the restoration of the development site. As such, the minimum period of time required for the proposed diversion, would be 6 years 3 months. At the Inquiry, the Applicant put it to me that the difference between that period of time and the suggested modified duration of 7 years, would allow some flexibility in terms of imponderable factors that may arise, such as extreme weather events, and which could delay the required re-instatement of the footpath to its original alignment.
13. Further to the above, it has been put to me by the Applicant that, given the phasing arrangements for the development site, the operation of the diversion route would not be required until sometime during 2025, at which point excavation of minerals would commence on the area of the development site where the line of the affected section of the existing footpath is currently located. As such, the Applicant is agreeable to securing the affected section of the existing line of Footpath 53 as a permissive path, up until the time at which extraction of minerals needs to commence in the relevant section of the development site. With regards to that proposed permissive path, the Applicant has offered a planning obligation, pursuant to section 106 of the 1990 Act, which it is maintained would secure provision of such a permissive path until such time as operations commence in this area of the development site.
14. Whilst I acknowledge the proposed provision of the permissive path as described above, any order to divert the footpath would take effect immediately upon confirmation. The acceptability or otherwise of the offered planning obligation would be a matter for consideration by Surrey County Council and outside the scope of the Inquiry. Consequently, whilst I have noted the offer of providing the permissive path, I must consider this decision on the basis that, in the event the Order is confirmed, the diversion would take immediate effect.
15. The Order as made provides that the diversion route would have a width of
2 metres. Objectors have put it to me that there is no justification for such a width, maintaining that the Applicant has offered to provide a diversion route with a width of 3 metres. Objectors have further put it to me that a footpath of only 2 metres in width would not allow for users, who may be accompanied by prams or large dogs, to pass each other conveniently or safely, and there are concerns that there would be no maintenance of vegetation adjacent to the diversion route which would be likely to further restrict its width.
16. The Definitive Map and Statement (the DMS) does not record a width for the affected section of the existing footpath. At the Inquiry, it was confirmed that, in respect of the creation of new footpaths, unless there was evidence which supported the recording of a lesser or greater width, the position applied by the Order Making Authority (the OMA) is that footpaths have a width of 2 metres. It was further put to me that, a width of 2 metres for a footpath is reasonable given the nature and predominant type of use of the path.
17. Notwithstanding those submissions, the Applicant suggests that, in the event that the Order was confirmed, whilst the width of the diversion route would be recorded as being 2 metres, it is their intention to provide a diverted route with a width
of 3 metres. It was put to me by the OMA and the Applicant that, for health and safety reasons and given the diversion route would be over land which is outside of the operational area of the development, there is confidence that the intended 3 metre width for the diversion route would be applied on the ground.
18. Apart from in certain specific circumstances which do not apply here, there are no statutory definitions for widths of rights of way. As such, it is necessary for me to consider whether a width would be appropriate in the circumstances. Given that the connecting unaffected section of the existing footpath around the field margin has a recorded width of between 1.5 to 2 metres within the DMS, a diversion route with a width of 2 metres would not be likely to represent a reduction when compared to the width of the affected section of the existing footpath. Furthermore, whilst there is a possibility that users may on occasion have to wait to allow others to pass who have natural accompaniments such as dogs or prams, a width of two metres would be sufficient to allow two people to pass each other conveniently and safely.
19. In this instance and in the event that the Order was confirmed, I also acknowledge that, for operational reasons, the width of the diversion route on the ground is likely to be 3 metres. As I observed on my site visit, it appeared that earth bunds around the operational areas of the site had been constructed and which provided sufficient space to allow for a path of 3 metres width to be constructed around the edge of the site.
20. In terms of maintaining the width of the diversion route, it was confirmed that the Applicant for the Order would keep vegetation from overgrowing onto the path, with the OMA confirming that if users encountered such difficulties, then complaints could be made to them, and which would require they take action calling for the Applicant to remedy that situation.
21. It is proposed that the diversion route is fenced on both sides. Objectors are concerned that such fencing would leave users with a feeling of being ‘hemmed in’ with no alternatives for escape in the event that difficulties are encountered, and that such fencing would restrict peoples’ ability to roam.
22. Whilst I acknowledge those concerns regarding the provision of fencing, it is clear that such structures are necessary in order to prevent users of the diverted path from wandering into operational areas of the development site. Furthermore, given the proposed alignment of the diversion route adjacent to a section of the River Ash, fencing would be necessary in order to prevent users, and potentially accompanying dogs, from entering that river for reasons of health and safety. It must also be noted that in the event the Order is not confirmed, and the alignment of the existing footpath is preserved, the Applicant could fence off the existing footpath in order to prevent users from wandering across the development site and would be likely to do so given the health and safety issues that could arise.
23. As noted above, at the most north-westerly point of the existing footpath, entrance to the footpath is gained from its connection with Gaston Bridge Road. That entry point onto the footpath comprises a sloping section of land, past trees and through a gap within a fenced off area. The evidence before me confirms that the land through the gap in fencing and trees, is not within the ownership of the Applicant. Significant concerns have been raised regarding this section of the existing footpath and in respect of the safety of users traversing down the slope from Gaston Bridge Road, and which it is maintained is slippery and dangerous to use.
24. However, whilst I acknowledge those concerns, the land in question is not within the ownership of the Applicant and, as above, is unaffected by the proposed diversion. As such, the suitability of the surface or gradient of that entry point onto the existing footpath, are matters outside the control of the Applicant and there would be no duty upon them to improve or upgrade that section of footpath as a result of the proposed diversion.
25. In terms of the proposed surface of the diversion route, it has been put to me in objection to the Order that unless action was taken by the Applicant to provide an all-weather surface, the diversion route would become waterlogged. As above, the existing footpath has an earth surface. Whilst the Applicant would be under no duty to provide an upgraded surface on the diversion route for the duration of the diversion, the Applicant has proposed that the diversion route has an earth surface that will be rolled and gravelled. As such, the proposed surface for the diversion route is likely to allow for better drainage and would represent a modest improvement when compared to the surface of the existing footpath.
26. Further objections to the Order have been put to me which concern the potential for conflict between users and vehicles at certain locations. As described above, a section of the diversion route would be located adjacent to the River Ash, and crosses over a maintenance road which provides access to the eastern areas of the development site via a bailey bridge. Furthermore, in the event that a temporary permissive path is provided on the alignment of the affected section of the existing footpath, a haul road would bisect that path at a location between points B-C as shown on the Order plan.
27. Whilst the acceptability, or otherwise, of the planning obligation that seeks to secure the above described proposed permissive path is outside the scope of this decision, the submissions confirm that signs and gates would be installed where the haul road crosses over that proposed permissive path, with vehicles being required to stop to allow safe and unhindered passage by users across that path.
28. In respect of the crossing of the maintenance road which provides access to the eastern areas of the development site via a bailey bridge, the diversion route would provide a ramp at a 1:20 gradient, which would have a slip proof surface, handrails, and a width of 1.5 metres. Warning signs would also be installed. Where the line of the diversion route crosses the roadway, there would be no gates which users would have to negotiate.
29. However, vehicles using that roadway would be required to stop, opening gates placed on the road in advance of the crossing point for the diversion route. Vehicle operators would then need to pass through the gates, stopping again in order to shut those gates before seeking to progress onwards over the bailey bridge. As I observed on my site visit, there would be sufficient clear lines of visibility in both directions for users when crossing over this maintenance road, with vehicle operators having clear lines of sight in both directions along the diversion route.
30. By reason of the above arrangements, and given that gating at the crossing of this road would be against the vehicular traffic which the evidence before me indicates is likely to only involve approximately two or three vehicle movements per day, I am satisfied that there would be no significant disadvantage to users in terms of safety when crossing over the bailey bridge road. It is noted that the proposed ramp on the diversion route where it approaches and crosses the bailey bridge road, would have a width of 1.5 metres, and therefore would constitute a limitation that would need to be recorded within the DMS.
31. In addition to matters described above, in terms of the advantages of the proposed Order, it is also acknowledged that the diversion route would provide users with views of the River Ash that are not achievable from the existing footpath. Furthermore, it must be borne in mind that a significant advantage of the Order is that the approved planning permission can be achieved in full without the potential loss of a significant amount of mineral material.

***Public Sector Equality Duty***

1. Concerns have been raised which maintain that there has been a lack of proper consideration and application of the requirements of the Equality Act 2010. In respect of the above matters, I have had due regard to the Public Sector Equality Duty contained in section 149 of the Equality Act 2010, which sets out the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it.
2. The diversion route would have an earth surface that would be rolled and gravelled which represents an improvement, both in terms of drainage and in terms of accessibility, when compared to the surface of the existing footpath. There would be no reduction in the width of the way when compared to the existing position, and it is likely that a greater width would be provided on the ground. There would be no gates or other obstructions on the diversion route and, where there would be a slight change in ground level, a ramp of suitable gradient with handrails and slip proof surfacing, is to be provided.
3. As noted above, concerns regarding the condition of the entry point onto Footpath 53 from Gaston Bridge Road, are matters that concern land outside the ownership of the Applicant. In light of the above matters, including the additional length of the diversion route, and when taking into account the characteristics of the existing footpath, there would be no disproportionality introduced to persons with protected characteristics. Consequently, I consider that the Public Sector Equality Duty has been discharged in coming to this decision.

***The reinstatement of the Footpath***

1. Given the requirements of section 261(2)(b) of the 1990 Act, consideration must be given to the proposals regarding reinstatement of the footpath after the minerals at the site have been worked in accordance with the planning permission.
2. As noted above, the relevant planning permission includes a planning condition that requires Footpath 53 shall be re-instated to its original line within three months of the completion of the restoration of the development site, with the reinstated footpath being to an appropriate standard and specification.
3. At the Inquiry it was confirmed that Surrey County Council would be responsible for deciding whether or not the reinstated footpath is to the required standard. In that regard, the OMA confirmed that a written description, supported by photographic evidence, of the existing standard and specification of the footpath would be recorded. Such records would then be used as a reference for the Council when deciding whether or not the re-instated footpath was to an appropriate standard and specification.
4. In conclusion of this matter, given the requirements of the planning condition and the assurances provided that officers at a later date would be able to compare the re-instated footpath to the existing condition of Footpath 53, I am satisfied that, on completion of the permitted excavation of materials at the site, the footpath can be reinstated to a condition not substantially less convenient to the public.

***Summary***

1. The diversion route would be more than twice the length of the affected section of the existing footpath and, for the reasons given above, may inconvenience some users whilst being seen as an advantage by others. The diversion would be for a period of seven years. However, subject to Surrey County Council’s decision on the acceptability of the proposed planning obligation described above, the diversion of the footpath may be delayed until such time as excavation commences in that area of the development site, with the likely result being that the diversion of the footpath would be for a period of less than seven years.
2. The advantages of the order are that the planning permission already granted, and which provides for the creation of new permissive paths across the area following restoration of the site, can be achieved in full without the potential loss of 75,000 tonnes of mineral whilst providing a section of footpath with a surface that is likely to provide better drainage. The diversion route would also provide users with views of the River Ash that are not achievable from the existing footpath. As above, whilst the diversion route would have a width of 2 metres, for operational and safety reasons, it is likely that the width of the diversion route would be 3 metres on the ground.
3. In terms of the suggested modifications, it is necessary to amend the period during which the diversion will take effect, and I am satisfied that a period of 7 years from the date of confirmation of the Order would be reasonable in the circumstances. It is further necessary to record the limitation at the bailey bridge road crossing.
4. I found that those parties who spoke at the Inquiry in objection to the Order raised concerns that needed consideration and clarification, and I am grateful for their contributions. I have given substantial weight to those matters as raised in the objections which are relevant to the Order that is before me. Nonetheless, I find overall that, subject to the modifications described above, there would be no disadvantage or loss to the public, or to other parties, which would outweigh the advantages associated with confirming the Order.

**Other Matters**

1. In addition to the above matters, Objectors further put it to me that consideration should be given to other potential alternative diversion routes across the area. However, and notwithstanding that a number of the suggested alternative diversion routes would require crossing other operational areas of the development site, my role is to consider the merits of the proposed diversion and the proposed diverted route as shown in the Order. As such, and given my findings above that any disadvantages or loss likely to arise as a result of the diversion of the way to members of the public would not be of such substance to outweigh the benefits of confirming the Order, it has not been necessary for me to consider further the potential alternative routes as favoured by some Objectors.

Conclusions

1. Having regard to the above and all other matters raised in written representations, I conclude the Order should be confirmed subject to the modifications referred to in paragraph 55 above. Schedule 14 to the 1990 Act provides that where confirmation is proposed subject to modifications to the Order, notice must be given (by further advertisement) in cases where the modification affects land not affected by the Order as made. However, that does not apply here, and I therefore will modify the Order as requested without giving further notice.

**Formal Decision**

1. I confirm the Order subject to the following modifications:
* Delete the text “*The footpath over the land shown by a bold black line on the attached map and described in Part 1 of the schedule of this Order (“the schedule”) shall be temporarily diverted as provided below for a period of 25 years. Before expiration of this period the footpath will be restored to a condition not substantially less convenient to the public.*” at paragraph 1 of the Order, and insert:

“*The footpath over the land shown by a bold black line on the attached map and described in Part 1 of the schedule of this Order (“the schedule”) shall be temporarily diverted as provided below for a period of 7 years. Before expiration of this period the footpath will be restored to a condition not substantially less convenient to the public.”*

* In the Schedule to the Order add:

“*PART 3*

*Limitations and conditions*

*Limitations: Ramp at least 1.5 metres wide with a gradient no more
than 1 in 20 either side of bridge at grid reference: 509512 167644*.”

Mr A Spencer-Peet

INSPECTOR

**Appearances**

**For Surrey County Council:**

Mr T Ward of Counsel *instructed by* Surrey County Council

Mrs C Valiant Countryside Access Officer

**For the Applicant:**

Mr A Fraser-Urquhart KC of Counsel *instructed by* Cemex UK Operations Limited

*who called:*

Mr M Kelly UK Planning and Permitting Manager of Cemex Western Europe Materials

**In Objection to the Order:**

Mr M Robertson

Mr J Douglass

Mrs N Rose

**Documents Submitted at Inquiry:**

1. Opening Submissions on behalf of the Applicant.
2. Opening Submissions by Mr M Robertson.
3. Statement by Mr J Douglass.
4. Site photographs submitted by Mrs N Rose.
5. Suggested Modifications document submitted by Surrey County Council.
6. Copy of signed Unilateral Undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 submitted by the Applicant.
7. Closing Submissions on behalf of the Applicant.
8. Closing Submissions by Mr M Robertson.
9. Closing Submissions on behalf of Surrey County Council.

ORDER MAP - COPY - NOT TO SCALE

