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## Appeal Decisions

Hearing Held on 10 October 2019, 4 February 2020

Site visits made on 10 October 2019 and 4 February 2020

**by Katie Peerless Dip Arch RIBA**

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

**Decision date:**

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### **Appeal A: APP/P0240/C/18/3213822**

**Land at Kingswood Nursery, Dunstable Road, Tilsworth, Leighton Buzzard LU7 9PU**

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
  - The appeal is made by Mr Tony Fitzharris against an enforcement notice issued by Central Bedfordshire Council.
  - The enforcement notice, CB/ENC/18/0329/1, was issued on 14 September 2018.
  - The breach of planning control as alleged in the notice is the material change of use of the Land from paddock land to use for the stationing of caravans in connection with a Gypsy and Traveller site.
  - The requirements of the notice are: (i) Cease using the Land as part of a Gypsy and Traveller Site; (ii) Remove from the Land all caravans and other items associated with the use as part of a Gypsy and Traveller Site.
  - The period for compliance with the requirements is four months.
  - The appeal is proceeding on the grounds set out in section 174(2)(a) and (g) of the Town and Country Planning Act 1990 as amended.
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### **Appeal B: APP/P0240/C/18/3213827**

**Land at Kingswood Nursery, Dunstable Road, Tilsworth, Leighton Buzzard LU7 9PU**

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
  - The appeal is made by Mr Tony Fitzharris against an enforcement notice issued by Central Bedfordshire Council.
  - The enforcement notice, CB/ENC/18/0329/2, was issued on 14 September 2018.
  - The breach of planning control as alleged in the notice is the creation of an area of hardstanding on the Land.
  - The requirements of the notice are: Remove the hardstanding from the Land and restore the Land to its former condition.
  - The period for compliance with the requirements is four months.
  - The appeal is proceeding on the grounds set out in section 174(2)(a) and (g) of the Town and Country Planning Act 1990 as amended.
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### **Appeal C: APP/P0240/C/18/3213832**

**Land at Kingswood Nursery, Dunstable Road, Tilsworth, Leighton Buzzard LU7 9PU**

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
- The appeal is made by Mr Tony Fitzharris against an enforcement notice issued by Central Bedfordshire Council.
- The enforcement notice, CB/ENC/18/0329/3, was issued on 14 September 2018.

- The breach of planning control as alleged in the notice is the siting of a portacabin on the Land.
  - The requirements of the notice are: remove the portacabin and any associated services from the Land and restore the Land to its former condition.
  - The period for compliance with the requirements is four months.
  - The appeal is proceeding on the grounds set out in section 174(2)(a) and (g) of the Town and Country Planning Act 1990 as amended.
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### **Appeal D: APP/P0240/C/18/3213829**

#### **Land at Kingswood Nursery, Dunstable Road, Tilsworth, Leighton Buzzard LU7 9PU**

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
  - The appeal is made by Mr Tony Fitzharris against an enforcement notice issued by Central Bedfordshire Council.
  - The enforcement notice, CB/ENC/18/0329/4, was issued on 14 September 2018.
  - The breach of planning control as alleged in the notice is the siting of additional caravans on the Land in excess of the two permitted by way of condition 6 attached to the Appeal Decision dated 17 August 2015, reference APP/P0240/A/12/2181674.
  - The requirements of the notice are: Remove caravans from the Land so that no more than two caravans, of which no more than one shall be a static caravan, are sited on the Land.
  - The period for compliance with the requirements is four months.
  - The appeal is proceeding on the grounds set out in section 174(2)(a) and (g) of the Town and Country Planning Act 1990 as amended.
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## **Decisions**

### **Appeal A: APP/P0240/C/18/3213822**

1. The appeal is allowed on ground (g), and it is directed that the enforcement notice be varied: by the deletion of 4 months and the substitution of 18 months as the period for compliance. Subject to these variations the enforcement notice is upheld.

### **Appeal B: APP/P0240/C/18/3213827**

2. The appeal is allowed on ground (g), and it is directed that the enforcement notice be varied: by the deletion of 4 months and the substitution of 18 months as the period for compliance. Subject to these variations the enforcement notice is upheld.

### **Appeal C: APP/P0240/C/18/3213832**

3. The appeal is allowed on ground (g), and it is directed that the enforcement notice be varied: by the deletion of 4 months and the substitution of 18 months as the period for compliance. Subject to these variations the enforcement notice is upheld.

### **Appeal D: APP/P0240/C/18/3213829**

4. The appeal is allowed on ground (g), and it is directed that the enforcement notice be varied: by the deletion of 4 months and the substitution of 18 months as the period for compliance. Subject to these variations the enforcement notice is upheld.

## **Main Issues**

5. It has been agreed by the parties that, in the case of Appeals A, B and C the development represents inappropriate development within the Green Belt and the main issues in these cases are therefore, on ground (a): (i) the effect of the development on the openness of the Green Belt and the character and appearance of the surrounding area and (ii) whether there are any material considerations that outweigh the harm caused by inappropriate development in the Green Belt, and any other harm, and are sufficient to justify the proposal on the grounds of very special circumstances.
6. On Appeal D, there is disagreement as to whether the failure to comply with the condition is inappropriate development in Green Belt terms and so the main issues on ground (a) are: (i) the effect of the failure to comply with the condition limiting the number of caravans on the site on the openness of the Green Belt and the character and appearance of the surrounding area and (ii) whether the inclusion of the additional caravans on the site subject of the planning permission granted by decision APP/P0240/A/12/2181674 is inappropriate development and if so, whether there are any material considerations that outweigh the harm caused by such development, and any other harm, and are sufficient to justify the proposal on the grounds of very special circumstances.
7. On ground (g) the main issue for all appeals is whether the time for compliance with the notices is reasonable.

## **Site and surroundings**

8. The appeal site includes an authorised gypsy and traveller site and an extension to it to the north west. It stands adjacent to other such authorised sites in Green Belt countryside on the outskirts of the village of Tilsworth, which is some 0.5 miles distant and about 3 miles from the town of Bedford.
9. I saw that, on the date of the first site visit in October 2019, there were 4 caravans (3 static and 1 tourer) on the authorised part of the site and 2 static caravans and 2 tourers on the extended area, which has also been covered with hardstanding. I was also told that there was one touring caravan away from site. In addition, behind the north western boundary fence, but with access through it, was a portacabin used as a ladies' W.C. and a small shed adjacent to one of the unauthorised static caravans. A number of vehicles were parked on both the authorised and unauthorised parts of the site.
10. At my second visit, in February 2020, there was a large tourer and a static caravan occupied by the appellant's family, one other static caravan and an associated tourer on the authorised site and 3 static caravans and 3 tourers on the unauthorised part of the site.
11. There was some confusion at the Hearing because duplicate versions of the statements made by the occupants, each redacted differently, had been posted on the Council's website, which appeared to suggest that there were more people on the site than is actually the case. For clarity, the site is occupied by 6 families in total, which includes the family of the appellant who are those named in the planning permission granted on appeal in 2015.

12. At the time of my second site visit, on the authorised site there was one additional family with 3 members, one of whom is under 18 and 13 occupants on the unauthorised site, 5 of whom are children, mostly teenagers. For the avoidance of doubt this equates to 11 authorised and 16 unauthorised occupants. It does, however, appear from the Council's records of their visit to the site in January 2019 that some of the occupants may have changed since that date.

## **Reasons**

### *Appeal D – inappropriate development?*

13. The appellant argues that the stationing of the additional 2 caravans on the part of the site that is authorised as a gypsy and traveller site is not development as defined in s.55 of the Town and Country Planning Act 1990 (as amended) (TCPA). That definition refers to development as being '*the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land*'. He maintains that the stationing of caravans that meet the definition of such in the Caravan Sites Act is not 'operational development', as they are not classified as buildings. Therefore, the only development that could have taken place through the stationing of additional caravans would be a material change of use and the appellant disputes that this has happened.
14. The enforcement notice does not allege such a change of use although, at the Hearing, the Council submitted that this is what had occurred. What has been enforced against is a breach of the condition imposed on the planning permission granted on appeal in 2015<sup>1</sup>.
15. In such cases, the deemed planning application under s177(5) of the TCPA is a retrospective one seeking to carry out the original development without complying with the particular condition referred to. It is similar to a retrospective application under s73A(2)(c).
16. The deemed planning application that is the subject of the appeal on ground (a) will therefore be for the development already permitted, that is '*the use of land for the stationing of caravans for one gypsy pitch, together with the formation of additional hardstanding and the retention of a utility/day room ancillary to that use*', without complying with condition 6 attached to the permission granted on 17 August 2015. Therefore, it seems to me that the permission sought is still for a material change of use from agriculture, which was found by the previous Inspector to constitute inappropriate development in the Green Belt. I find no reason to disagree with this assessment and the appeal on ground (a) for Appeal D will therefore be considered on that basis.

## **Ground (a)**

### *Green Belt*

17. I have found that all the appeals amount to inappropriate development in the Green Belt. The harm caused by such development should be accorded substantial weight in planning decisions as set out in paragraph 144 of the National Planning Policy Framework (the Framework).

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<sup>1</sup> Ref: APP/P0240/A/12/2181674

18. In addition to the harm through inappropriateness, there is, in my view, also harm to the openness of the Green Belt. Static and touring caravans and a portacabin have been placed on previously open land in an agricultural use and hardstanding has been laid on it. The amount of development on the authorised site has also increased. The physical presence of all this development has reduced the openness of the Green Belt.

#### *Character and appearance*

19. In addition, the Council submits that there is also harm to the character and appearance of the surrounding area. The appeal site includes the authorised gypsy site and the siting of additional caravans on this area has, in my view, little impact beyond the boundaries of that site. Also, the additional development beyond, when viewed from the east, is seen in the context of the authorised site and the other gypsy sites to the south west and reflects the character of those areas. It is partially screened from the road, albeit by brick walls and close boarded fencing, which would be likely to remain even if the unauthorised development were to be reduced to that permitted at the previous appeal.
20. However, the spread of the development into the agricultural land beyond has had a further urbanising influence on the wider landscape through, for instance, the removal of the line of trees that formerly marked the rear boundary of the authorised site, leaving it more open to public views, particularly from the golf club to the north east. I therefore find that there has been an adverse impact on the character of the agricultural landscape on which the extension to the authorised development is located.

#### *Sustainability*

21. The Council also considers that the development represents unsustainable development as defined in the Framework, referring to the findings of the Initial Settlements Capacity Study – July 2017, which was prepared to accompany the emerging Central Bedfordshire Local Plan 2015 – 2035 (LP). This concluded that Tilsworth has a limited capacity for growth, having a lack of easily accessible services and facilities, particularly healthcare and retail. The Council considers that this, and the harm to the environment, are not outweighed by what it considers to be the marginal social and economic benefits the provision of the additional gypsy pitches would represent.
22. On these matters, I consider that there may be some merit in making better use of the authorised site but I am mindful that the Inspector at the original appeal granted a personal planning permission because of the particular circumstances of the family involved. He did not appear to consider that there was merit in allowing an unrestricted use by any gypsy meeting the planning definition and imposed conditions to control this.

#### *Very special circumstances*

23. The appellant has set out a series of considerations that he claims are in favour of granting planning permission for the unauthorised developments and which amount to the 'very special circumstances' required to allow this.

## Need and failure of policy

24. One of these considerations is the claim that the Council cannot demonstrate a 5 year supply of gypsy and traveller sites and has not got a policy framework in place that will allow it to do so. The Council, however, now considers that it has identified a 5 year supply although it agreed that, at the time of the Inquiry, it could not identify any specific sites available to which the unauthorised occupants could move, were they to be required to leave Kingswood Nursery.
25. At the time of the previous appeal, which granted a personal planning permission for the appellant, his wife and resident dependents (who now include 10 children), there was agreement that the Local Planning Authority did not have a 5 year supply of gypsy sites. However, in 2016 it published a Gypsy and Traveller Accommodation Assessment (GTAA) carried out by Opinion Research Services Ltd (ORS) to inform the production of the LP.
26. There has been a long history of dispute at appeal between ORS and Green Planning Studio (GPS), the planning agents for the appellant, over the suitability of the assumptions and methodology used by ORS in the preparation of their GTAAs and consequently the accuracy of their conclusions. Similar detailed arguments are raised by GPS in respect of this appeal and have been addressed by ORS, whose representative attended the Hearing.
27. However, whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.
28. In this particular case, the emerging LP has been to Examination in Public in the summer of 2019 and I am told that there were no further queries raised by the Inspectors on the Council's GTAA and the proposed statement of need following the responses given in Matter 9 of the Council's Hearing Statement and its appendix, which deals with the provision of gypsy and traveller accommodation. Although the Examination in Public is to be re-convened to consider a number of queries that were raised, the relevant policies relating to gypsies and travellers are therefore unlikely to change.
29. Nevertheless, the Appellant makes a criticism of the assumption in the GTAA that the housing needs of ethnic gypsies who do not meet the 'planning' definition of travellers, as set out in PPTS, should be included in an assessment of the wider planning needs of the area. It is claimed that the wording of the Framework, in paragraph 61 and footnote 25, indicates that all travellers, whether meeting the 'planning definition' or not should be included in the GTAA and the consequent calculation of the number of pitches required.
30. The Framework, in paragraph 61, notes that housing needs for different groups, (including travellers) should be assessed and reflected in planning policies. Footnote 25 refers to travellers and states '*Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.*' Annex 1 of PPTS notes that for the purposes of that policy document 'gypsies and travellers' means '*Persons of nomadic habit of life whatever their race or origin, including*



*such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.'*

31. It seems to me that this wording makes clear that it is only those meeting that definition that should be included in an assessment of need for 'planning definition' travellers and that gypsies who have ceased travelling should be counted and provided for elsewhere and this is the approach proposed in the emerging LP. This does not, of course mean that these gypsies should be allocated 'bricks and mortar' type housing. They will also need a suitable supply of caravan sites to meet their needs. At the Hearing, the appellant made the point that, whatever the definition, the appeal site could help to provide accommodation for either group. However, for the purposes of considering whether the Council has a 5 year supply of sites for travellers that meet the PPTS definition in Annex 1, I consider that, for this case, it should be assumed that the numbers for 'non-travelling' gypsies will be provided for in other parts of the LP that the criticism of the GTAA in this respect is unfounded.
32. The GTAA concludes that there is a need for 28 additional pitches over the period 2016-2035 for gypsy and traveller households that meet the 'planning definition' and which includes an allowance for 'unknown' gypsy and traveller households that have not yet been identified. The Council also submits that it has made sufficient provision to facilitate the delivery of sites. The appeal site was not promoted for inclusion in the emerging Plan and has not been identified, or required, to meet that provision. In its response to questions from the LP Inspectors the Council stated, in April 2019, that it had an 18.73 year supply against its objectively assessed need of 28 pitches. I have been given no evidence to indicate that the Inspectors have challenged this information, which is therefore likely to be carried forward into the final version of the LP. Nevertheless, the LP has not yet been adopted and consequently the weight that can be accorded to the policies within it is necessarily limited.
33. In summary, the Council considers that it has identified in excess of a 5 year supply of gypsy and traveller sites for those that meet the 'planning definition' and the appellant calculates that there will be a shortfall of 24 pitches in the LP period 2019 – 2024, based on the alleged errors in the GTAA methodology. However, I am not persuaded that this latter figure can necessarily be taken as an accurate estimate, given the consistent and widespread acceptance, following at Examinations in Public, that the OCS methodology is sound. I therefore find no reason to reject the findings of the GTAA.
34. Nevertheless, given the constantly changing circumstances and the possibility that some gypsy and traveller families might have been overlooked, I accept that the estimates might yet vary. I therefore accord some limited weight to any possible shortfall at this stage in the LP process.
35. However, as noted above, it was agreed that there are no immediately available sites in the local authority's area to which the unauthorised occupants could move and I give this factor considerable weight when reaching my decision. There has also been a lack of sites in the area for some time and this was the case in 2015 when the appeal decision granted planning permission for the appellant and his family to live on the site.

36. The local planning authority intends to rely on grants of planning permission to meet the need for pitches and this means that there is likely to be a further delay in available sites coming forward. Again, I give this factor considerable weight.

#### *Personal circumstances*

37. As noted previously there are a number of children among the unauthorised occupants and their best interests are a primary consideration. It would obviously be undesirable for them to be forced to leave the site with no settled base to go to from where they could access education and medical services. I note that some of the families have already registered with a doctors' surgery locally. However, at present none of the children on the site attend school but are, apparently, home schooled. It could be difficult to continue with this arrangement if the families were to be displaced although I have been provided with no further details on this matter. I also note that I have been given no indication that the parents of the children hope to enrol them in a local school. This somewhat reduces the importance of them being able to remain on this particular site.
38. On that topic, I note that a member of one of the families is related to the appellant but none of the others appear to have ties to the authorised occupants that would indicate that this site is important for maintaining family links or allowing an extended family to live together. One occupant has another relative living in the vicinity, but apart from a natural desire to remain close by, I have been given no specific reason why there is a need for them to live on this particular site.
39. The witness statements submitted by the unauthorised occupants give very little detail about why they have moved to the site, other than that they heard from friends that it might be available. It is reasonable to assume that they had a need to find somewhere permanent to live but there is no detail about whether they were previously living in Central Bedfordshire, where they would have been included in the counts of gypsy families, or whether they are additional families that now need to be provided for.
40. In summary, I give considerable weight to the fact that the families would be likely to be homeless if the enforcement notices were to be upheld, but this is tempered by the fact that there appears to be no imperative need for them to necessarily stay in this locality.

#### *Other matters*

41. Interested parties are very concerned about the impact that the enlargement of the gypsy site has had on the quality of life in the village and they report many instances of anti-social behaviour relating to the traveller sites in Dunstable Road. In the report to committee for planning application CB/18/01747/FULL, which sought planning permission for a total of 4 static and 4 touring caravans on the appeal site and which was refused in 2018, Bedfordshire Police noted that between 1 February 2016 and the date of the Report, they had dealt with 69 incidents relating to those sites, of which 50 could, in their view, be considered to have reasonably increased public fear of crime or to have endangered public safety.



42. Whilst there is no certainty about who has carried out these incidents, they clearly appear to stem from the gypsy sites in the locality. Therefore, from this report and from what I was told at the Hearing and the submitted written statements, I have no doubt that the residents have good reason to object to some of the behaviour that they have experienced and that it has caused concerns and fear of further such incidents in their community. Although, as noted, I have no evidence as to whether it is the unauthorised occupants of the appeal sites that are responsible, the increase in the total number of residents will have exacerbated the public fear of further such incidents.
43. In addition, the advice in PPTS advises that local planning authorities should ensure that, among other things, their policies promote peaceful and integrated co-existence between the site and the local community. It is clear that the relationship between the local settled and travelling communities here do not live up to this aspiration and the increase in the numbers of travellers on the appeal site is a factor contributing to this.
44. I was told that the number of gypsy caravans on the amalgamation of sites that include Kingswood Nursery and its neighbours now amounts to about 25 and the total of houses in the village is about 140. I have not been given documentary evidence of this but, conversely, I have no reason to dispute the figures. Whatever the precise figures, it seems to me that, in this case, the proportion of travelling families to settled occupants is creating tensions between the communities and the perception that the appeal site is being expanded without going through the normal planning process is contributing to this.
45. Whilst there was an application for planning permission made for additional development on the authorised site, this did not include the expansion into the agricultural land and it was, in any event, refused. The Government is concerned about the harm caused where development in the Green Belt is undertaken in advance of obtaining planning permission, such that there is no opportunity to appropriately limit or mitigate any harm that is caused and a Written Ministerial Statement advises that 'intentional unauthorised development' in the Green Belt is a material consideration to be weighed in the determination of planning applications and appeals. I consider that the appeal development falls within this category and this consequently adds some weight to the objections to the development.
46. I also note that pitches on the appeal site appear to have been advertised for rent by the site owner, who does not live on the site, and the development therefore seems to have been for speculative commercial purposes rather than for the specific needs of the family who already had permission to live there.

### ***Balancing exercise***

47. Government advice, as given in PPTS, notes that, 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. This does not, of course, mean that such considerations cannot meet the test.

48. In this case, there is significant harm to the Green Belt and further harm to the character of the area. There is tension between the occupants of the site and the local residents and the fear of crime is real and affecting their sense of well-being. The Council is confident that it will be able to meet the need for sites for sites in the future and I note it has already granted a number of planning permissions to this end. I also consider that the personal circumstances of the unauthorised families are not such that they should carry any significant weight in favour of granting planning permission and that the intentional unauthorised development weighs against the proposal.
49. However, I have found that there are no available sites to which the unauthorised occupants could move at present and to uphold the enforcement notices would be likely to mean that they, and their children, are forced to a roadside existence, to move to another unauthorised site or to 'double up' on another site which could lead to overcrowding and further enforcement action.
50. On balance however, I am not persuaded that, even taking the best interests of the children into account, the harm to the Green Belt and the countryside, together with the other considerations outlined above are clearly outweighed by the benefits of the proposal. I conclude that there are no very special circumstances that warrant allowing a permanent planning permission.
51. I have therefore considered whether to grant a temporary permission but this is normally only acceptable where there is no 5 year supply of sites, which I have found is unlikely to be the case here. I consider that it would be preferable to encourage the occupants of the site to find a permanent location as soon as possible rather than deferring that search to a much later date.

### ***Human rights and the Public Sector Equality Duty***

52. I have considered the rights of the appellants under the Human Rights Act 1998. This affords the right to respect for private and family life, including the traditions and culture associated with the gypsy way of life. This is a qualified right, and interference may be justified where in the public interest. The concept of proportionality is crucial. Dismissing the appeal will interfere with the rights of the unauthorised occupants of the site rights since the consequence would be that they could be rendered homeless. However, the interference would be in accordance with the law and in pursuance of a well-established and legitimate aim: the protection of the Green Belt.
53. I have also had due regard to the Public Sector Equality Duty (PSED) 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. I am satisfied that the current occupiers are Romany Gypsies and Irish Travellers and they are therefore persons who share a protected characteristic for the purposes of the PSED.
54. It does not follow from the PSED that the appeals should necessarily succeed but the current shortage of sites and lack of any development plan policy for travellers may indicate inequality of housing opportunity for them. These equality implications add some weight to my considerations but are not, in my judgement, sufficient, even when taken with the other identified benefits, to amount to the very special circumstances needed to outweigh the identified harm.

### **Ground (g)**

55. Although I have found that planning permission should not be granted for the development enforced against on the appeal site, I am concerned that the unauthorised occupants should have sufficient time to find alternative sites. The Council are using the criteria set out in emerging LP policies H8 and H9 to determine whether a site is suitable for gypsy and traveller accommodation and the occupants will need time to identify available sites that are likely to meet these criteria. They will then need to submit planning applications for the proposals.
56. The enforcement notices allow only four months for compliance and it would be highly unlikely that this would be sufficient time to complete this process. Therefore, taking into account the best interests of the children, I consider that a period of 18 months would be an appropriate timescale to allow the families to make other arrangements. The enforcement notices will be varied accordingly.

### **Conclusions**

57. For the reasons given above I conclude that a reasonable period for compliance would be 18 months, and I am varying the enforcement notices accordingly, prior to upholding it. The appeals under ground (g) succeed to that extent.

*Katie Peerless*

**Inspector**

## **APPEARANCES**

### **FOR THE APPELLANT:**

Matthew Green  
Tony Fitzharris

Green Planning Studio  
Appellant

### **FOR THE LOCAL PLANNING AUTHORITY:**

Phillip Hughes BA(Hons) MRTPI  
Steve Jarman BSc Grad Dip TP

For Central Bedfordshire Council  
Opinion Research Services Ltd.

### **INTERESTED PERSONS:**

L Houston  
B Houston  
Cllr E Sutton  
J Westbury  
M Griffin  
Mrs Dimmock  
S Forsythe

Village Focus Group  
Local resident  
Stanbridge Council  
Local resident  
Local resident  
Local resident  
Local resident

### **DOCUMENTS**

- 1 Draft Statement of Common Ground
- 2 Central Bedfordshire Council's letter to Local Plan Inspectors (EXAM 83) dated 9 January 2020
- 3 Letter from Planning Inspectorate to Central Bedfordshire Council dated 15 January 2020