Appeal Decision

Inquiry held on 8, 9, 10 and 14, 15, 16 May 2024 Site visit made on 15 May 2024

by Mr M Brooker DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 1st October 2024

Appeal Ref: APP/N1920/W/23/3335284 Bell Lane, London Colney, St Albans, AL2 1BZ

- 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 Watford Football Club against the decision of Hertsmere Borough Council.
- The application Ref is 21/0811/FUL.
- The development proposed is a pitch cover/inflatable dome.

Decision

1. The appeal is allowed and planning permission is granted for a pitch cover/inflatable dome at Bell Lane, St Albans, AL2 1BZ in accordance with the terms of the application, Ref 21/0811/FUL, and the plans submitted with it, subject to the conditions in the attached schedule.

Preliminary Matters and Main Issues

- 2. This appeal seeks planning permission for the retention of the inflatable dome (the Dome). The description of the development detailed on the submitted forms includes the phrase "retention". As retention is not an act of development it is not appropriate to use this in a description of the development. I have therefore amended the description accordingly.
- 3. The Dome is currently erected on site and previously benefited from a temporary planning permission¹ for 5 years subject to a condition that allowed for the inflation of the dome between 1 April and 1 October every year.
- 4. A new version of the National Planning Policy Framework (the Framework) was published on 19 December 2023. The parts of the Framework most relevant to the appeal have not substantively changed from the previous iteration and while the appeal was submitted just before the new version of the Framework was published, the parties' proofs of evidence were submitted sometime later. Consequently, this update to national policy does not fundamentally alter the main parties' cases or prejudice their position at appeal, and it is not necessary to seek further comments. References hereafter in the decision to the Framework are to the December 2023 version.
- 5. Furthermore, on 30 July 2024 the Government published a consultation on proposed reforms to the NPPF and other changes to the planning system. The proposed reforms are draft and therefore may be subject to change.

¹ Core Document C5 Decision Notice for planning permission 172417FUL issued 27 November 2018

- Consequently I consider that they carry limited weight and it is not necessary to seek further comments from the parties.
- 6. The appeal site is located within the Green Belt. It was agreed that in the context of the Framework that the scheme would present inappropriate development within the Green Belt, a matter that must attract substantial weight against the proposals. I concur with this view.
- 7. Therefore, I consider that the main issues are:
 - a) the effect of the proposal on the openness of the Green Belt and its purposes.
 - b) Whether the proposal would preserve the setting of the nearby grade II* listed building Salisbury Hall.
 - c) 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 (VSC) required to justify the proposal.

Reasons

Green Belt Purposes and Openness

- 8. The courts² have confirmed that the openness of the Green Belt has a spatial aspect as well as a visual aspect. The Framework states³ that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." The extent and degree of the impact of the appeal scheme on the openness of the Green Belt is at dispute between the parties.
- 9. Excluding the Dome, the wider sports complex that incorporates the appeal site is viewed as a scattered and limited presence in the Green Belt as a result of the low height and scale of built development on it in combination with the screening afforded by existing tree planting and surrounding topography.
- 10. The Dome sits within the existing sports complex, identifiable as being distinct from the adjacent countryside by use and the presence of features such as car parking, access roads, a variety of permanent structures and associated paraphernalia. In this regard the site, without the Dome, would not be an open field free of built development.
- 11. The appeal scheme would allow for the Dome to remain permanently on site. This would introduce an additional structure onto the site and increase the amount of development present. As such it would lead to a reduction in openness of the site over and above the existing situation.
- 12. The spatial impact of the Dome would be derived from its height (agreed as being 22m), volume and mass. The overall result would be a large structure⁴ that inescapably has a spatial impact on the openness of the Green Belt. This would not be reduced by the fact that it covers an existing artificial football pitch and is located within a wider sports complex.

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² Turner v SSCLG & East Dorset Council [2016] EWCA Civ 466

³ Paragraph 142 The National Planning Policy Framework

⁴ Paragraph 7.15 Nick Green Proof of Evidence

- 13. In addition to this it can be seen as a prominent feature from a number of sensitive receptors, including residential properties and Public Rights of Way (PRoW). Indeed, the appellant accepts that there would be some impact from views to the south⁵. Nonetheless, when considered from many of the PRoW to the south of the appeal site, the Dome is viewed against a backdrop and within the context of, urban development. This serves to lessen the impact.
- 14. The scheme includes mitigation measures. Additional tree planting and other landscaping works would reduce the visual prominence of the Dome to some extent. However, they would by no means screen it substantially or in its entirety.
- 15. Overall, if kept permanently as proposed, the Dome would appear as a prominent and distinctive feature in a range of local views. As such it has a clear detrimental impact on the openness of the Green Belt in visual terms. Due to its location within an existing complex the scheme would not lead to further encroachment into the countryside. As such, I am satisfied that the proposal would not conflict with the other purposes of including land within the Green Belt as detailed in paragraph 143 of the Framework.
- 16. In conclusion, this area is less open with the Dome erected than it would be without it and there would be significant harm to openness arising from the appeal scheme. This, harm, in addition to the harm by inappropriateness, carries substantial weight against the proposals.
- 17. In this regard the appeal scheme is contrary to Policies SP1 and CS13 of the Core Strategy and SADM26 of the Site Allocations and Development Management Policies Plan in so far as it relates to the openness of the Green Belt.

The setting of the grade II* listed building, Salisbury Hall.

- 18. The significance of Salisbury Hall (the Hall), listed at Grade II*, is derived from its architectural interest as an example of late seventeenth century architecture and from its historic interest as an early example of a moated brick-built house and as a modest scale country estate comprising landowner and occupier.
- 19. The immediate setting of the Hall consists of a small cluster of designated heritage assets described by the parties⁶ as being in an estate complex. This includes Nell Gwynn Cottage, Bridge, Gateposts, and Revetment to Moat, The Old Coach House, Granary some 80 Metres North West Of Salisbury Hall and Barns located about 70 Metres North West Of Salisbury Hall are all Grade II, ancillary structures and listed for their 'group value'.
- 20. The parties agree⁷ that the setting of these Grade II assets is within the estate complex and therefore that the appeal scheme does not harm the setting of these assets. Based on the evidence before me and my observations at the site visit, I find no substantive reason to conclude otherwise.
- 21. Turning to the wider setting of the Hall, this principally comprises the surrounding arable farmland, albeit eroded by urban development and

⁵ Paragraph 7.20 Nick Green Proof of Evidence

⁶ Addendum Statement of Common Ground

⁷ Addendum Statement of Common Ground

- motorway infrastructure, and to a limited extent by the respective training facilities of Watford and Arsenal Football Clubs situated some 700m away.
- 22. The surrounding arable farmland contributes to the significance of the Hall through its open character and agricultural use which form an intrinsic part of the Hall's historic context. Furthermore, the adjacent De Havilland Aircraft Museum has influenced the Hall's setting through the construction of large Hangars and the siting of aircraft and relates to the history of the Hall.
- 23. Paragraph 205 of the Framework advises that when considering the impact of development on the significance of a designated heritage asset, great weight should be given to its conservation. Paragraph 206 goes on to advise that significance can be harmed or lost through the alteration or destruction of the asset and that any such harm should have a clear and convincing justification.
- 24. The appeal site forms part of a larger sports complex and, being located some 700m away, is physically and visually removed from the Hall. Views across the agricultural fields to the appeal site or the Hall are often fleeting and opportunistic rather than formally designed and laid out and generally take place within the context of the M25 and urban development beyond. As noted in evidence, "The existence of the dome does not hinder any specific views of the Hall due to the distance between them (c. 700m) and the intervening planting and vegetation."
- 25. Landscaping, principally in the form of screen planting, proposed by the appellant would mitigate the visual impact of the Dome on the setting of the Hall and the surrounding area, albeit some of the Dome will remain visible above the proposed trees.
- 26. The Council's evidence largely relies upon the consultation responses from English Heritage that referred to "concerns" but did not explicitly identify a level of harm. In contrast the appellant has produced a detailed Heritage Impact Assessment and a detailed proof of evidence that articulates and justifies their conclusion of the lowest level of less than substantial harm.
- 27. The proposed development is seen from a number of viewpoints within the setting of the Hall, such as PRoW, and as a result of the scale and visibility of the Dome would erode the open agricultural character of the setting, albeit to a moderate extent only.
- 28. The parties agree that the appeal scheme would result in less than substantial harm to the significance of the Hall in terms of paragraph 208 of the Framework. The extent of harm remains at dispute between the parties, the level of harm identified by the Appellant being the lowest level of less than substantial and the Council being low-medium.
- 29. Consequently, I find limited harm to the significance of the Hall via its effect on setting, this being less than substantial but nevertheless of considerable importance and weight.
- 30. There would therefore be conflict with Policies SP1 and CS14 of the Core Strategy 2013, Policy 29 of the Site Allocations and Development Management Policies Plan, Policies ENV 11 and ENV 12 of the Local Plan as a result.

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⁸ Peter Handforth Proof of Evidence para 5.9

⁹ CD.B16 Historic England

However, because these policies do not include the public benefits balance of the Framework¹⁰, the resulting conflict with Policies SP1 and CS14 of the Core Strategy and Policy 29 of the Site Allocations and Development Management Policies Plan carries limited weight only.

31. In accordance with the Framework, I am required to balance the heritage harm against any public benefits, which I consider in my 'Heritage Balance'.

Other Considerations

32. Paragraph 152 of the Framework sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 144 goes on to state that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. I consider the other considerations in turn.

Community group use

- 33. The appellant has submitted details of the use of the Dome by various community groups and proposes to secure the continued use of the Dome by condition.
- 34. The social value and community benefits offered by the Dome are summarised by the evidence of the appellant's witness¹¹. This identifies a total of 80,717 participant visits and 1,204 sessions between 2019 and 2024¹². The compliance with a number of Council strategy documents¹³ was identified in evidence, in addition to the compliance with policies of the Core Strategy and Site Allocations and Development Management Policies Plan relating to community facilities.
- 35. The use of the Dome is provided without charge, and this potentially saves groups a cost of £150 per hour¹⁴. The provision of cost-free access removes barriers to access.
- 36. The Dome is used by the Frank Soo Foundation which supports people of the local East and South East Asian community. The group has 60-70 participants (boys and girls from 2 years old) who attend monthly training sessions in the Dome. There are also volunteering opportunities for coaches, holding tournaments and events guiding children into joining local grass roots teams.
- 37. These sessions are of particular importance for these minority groups and the Dome is the only available venue to allow access for the Frank Soo Foundation to provide these sessions free of charge. This statement was not challenged by the Council. I attach significant weight to this public benefit.
- 38. Fighting Fit Football Club (FFFC) is run for people with Parkinson's. FFFC are based at the Dome and have played every week for over 4 years. There are specific characteristics of the Dome that benefit those with Parkinson's Disease

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¹⁰ Paragraph 207 of the National Planning Policy Framework

¹¹ CD.K8a Proof of Evidence of Wesley Ankrah

¹² Mr Wesley Ankrah Proof of Evidence, paragraph 2.5

¹³ Hertsmere Borough Council physical activity and well-being strategy; Hertsmere together community strategy; and Hertsmere Borough Council leisure facilities strategy

¹⁴ Mr Walker Proof of Evidence, Paragraph 3.8

including the "flat, safe and non-slippery surface"¹⁵. In addition, it is sheltered from the weather and provides a softer surface in comparison to other indoor facilities that have hard wooden floors presenting a risk to players who are at greater risk of falls. It is clear that there are significant health and social benefits that the use of the Dome gives to the participants. If the groups use of the Dome was lost this would be of significant detriment to the group members. This statement was not challenged by the Council. I attach significant weight to this public benefit.

- 39. I also heard about the use of the Dome by various other groups, including the deaf and visually impaired community. The Dome is used on a weekly, monthly and ad-hoc basis for groups, including children, ranging in size from 15-20 and over 100 people. The benefits of the specific characteristics of the Dome were referred to. These include very good wheelchair access and the open space inside, without dividing walls or noise reflective surfaces. This is of particular benefit to the individuals and their families as a result of the impairments that they have and that this use could not be easily replicated elsewhere. This evidence was not challenged by the Council. I attach significant weight to this public benefit.
- 40. Herts Youth Inclusive Football is a community group run by volunteers supporting players with a disability and/or additional needs to play football. They use the Dome for tournaments and consider that the space is "safe and inclusive". They also identify that there were fewer participants when events were held elsewhere. The evidence detailed that the internal space of the dome resulted in better emotional control of many of the players in comparison to outside events. Furthermore, many of the players attending were from low-income families and that the Dome being provided for no charge was an important factor for these families.
- 41. Watford Football Club Community Sports and Education Trust is a self-financing registered charity. They described how the Dome had been designed for the purposes of elite football and in their opinion had now become an "essential community facility". The scale of community use of the Dome was described as "transformational". This includes use by local schools, youth associations, football development programmes, women's football and FA coaching workshops and courses. This provided a for a "packed" schedule while allowing for regular booking by groups.
- 42. Many of the participants of the aforementioned community group organised activities have long term health conditions such as Parkinson's, are from minority communities or are disabled. It is evident that the activities have had significant life improving benefits for the participants and their families and I have attached significant weight to the public benefit of access to the Dome. If this appeal were to be dismissed, the benefits to these individuals would be lost, the effect of which is described as "catastrophic".
- 43. I attach significant weight to the harm to these individuals that would result from the dismissal of the appeal, and I have had due regard to the Public Sector Equality Duty (PSED) set out under s149 of the Equality Act 2010.

Watford Football Club Academy

¹⁵ Representation dated 27th November 2023

- 44. Turning to the Watford Football Club Academy, I have been referred to the Elite Player Performance Plan (EPPP) and the "mandatory"¹⁶ requirement for indoor training space. I understand that Watford FC aspires to achieving category 1 and are currently category 2. The loss of the Dome and therefore the academies indoor training facility, would result in the category 2 status being rescinded and as a category 3 status the academy would be at the mercy of category 1 and 2 clubs being able to recruit players from the Academy to the detriment of the finances and competitiveness of the Academy and the Club as a whole.
- 45. Watford Football Club is a private company, albeit one with a significant community following. I am of the opinion that while the economic success of the Club will inevitably have some beneficial effect on the economy and community of the area, it is nonetheless primarily of private benefit to the owners, and I am satisfied that the primary public benefit of the Dome is through community use of the Dome. I therefore afford the economic benefits of the us of the Dome by the Academy only moderate weight.

Biodiversity

- 46. The scheme would include improvements to the biodiversity of the site. There would be the incorporation of a 2.75km nature trail, landscape enhancements and environmental considerations, including the "embodied carbon emission investment" already incurred in the creation of the Dome.
- 47. Biodiversity and landscape enhancements are detailed in evidence as including "planting 95 additional hedgerow trees and 0.75ha of woodland scrub as well as allowing approximately 2,814 linear metres of existing hedgerow to increase in height"18.
- 48. Also referred to is a report titled 'Watford Football Club Biodiversity Strategy'¹⁹. The report acknowledges that it comprises only a "Preliminary Strategy and draft ecological assessment" and is very basic. Nonetheless, the report identifies a number of opportunities including establishing meadows to the boundaries, improving hedges and trees, reinstating ponds, ditches and "Create specific wildlife features along the proposed Wildlife Trail, including a butterfly meadow, a wild orchard using local fruit varieties, and an enlarged woodland"²⁰.
- 49. Specific details of the implementation of these proposed improvements are scant and to secure such details it would be necessary to impose a suitably worded condition to any permission resulting from this appeal. Nonetheless, the measures proposed by the appellant would result in an improvement in the biodiversity of the site and the landscaping works are of benefit in themselves, in addition to any screening effect of the Dome.
- 50. Consequently, biodiversity and landscape enhancements referred to here are material considerations that weigh in favour of the appeal scheme, and I afford them limited weight.

Effect on landscape

¹⁶ Mr Walker Proof of Evidence, paragraph 4.8

¹⁷ Mr Nick Green Proof of Evidence, paragraph 5.7

¹⁸ Ms Ruth Bishop Proof of Evidence, paragraph 7.4.1

¹⁹ CD K6c

²⁰ CD K6c

- 51. The effect of the appeal scheme on 'landscape character' is not recorded as a reason for refusal on the decision notice issued by the Council. Nonetheless, it is an issue for which considerable evidence has been submitted by the parties.
- 52. The appeal site, incorporating built development and areas of open playing fields, sits within an area described by the Council as being the Vale of St Albans, lying to the north of Shenley Ridge and comprising a shallow basin of the River Colne²¹.
- 53. When viewed from nearby PRoWs the appeal site appears as a distinct insertion into the open arable farmland that is the predominant land use inside the partial ring formed by the M25 motorway, Shenley Ridge and the urban development beyond. The area is typical of the urban fridge in character and appearance.
- 54. The resident of The Farmhouse in the Salisbury Hall estate, appeared at the Inquiry and confirmed that the Dome could be viewed from the front door, hall and first floor bedroom windows of his home. Furthermore, it was explained that the Dome dominates and thus harms many views in the area.
- 55. A Local Councillor referred to many of the same points as the resident and also refers to the dome as "a landmark for all the wrong reasons"²², providing evidence demonstrating that the Dome is visible from some nearby residential properties.
- 56. I note that there is the potential for a substantial new urban development, referred to as Bowman Cross, to be allocated in the emerging Local Plan. Such a development would inevitably have a significant urbanising effect on the area. Nonetheless, the emerging local plan is still at an early stage and although the draft allocation was included in an earlier iteration of the plan, I afford this potential allocation limited weight only.
- 57. The landscape around the appeal site is heavily influenced by urbanising development. However, by virtue of arable farmland and woodland, it retains areas that are clearly characteristic of the countryside. Consequently, as a result of the colour, size, scale and height of the Dome being visible between and above many of the existing trees, the appeal scheme creates a prominent and pervasive visual obstruction in this landscape.
- 58. In mitigation, additional tree planting and hedgerow enhancement will reduce the visual prominence of the Dome but will not screen the Dome in its entirety and when viewed would generally be seen against a backdrop of existing urban development. Consequently, the Dome will cause some erosion of the open and rural characteristics of the landscape of the area resulting in some limited harm to the landscape character.
- 59. In this regard the appeal scheme is contrary to Policy SP1 of the Core Strategy and in particular criterion (v).

Heritage Balance

60. In respect of the heritage balance, for the reasons set out in my decision, I concluded that there would be less than substantial harm to the heritage asset,

²¹ Peter Radmall Proof of Evidence Appendix A - Hertsmere Landscape Sensitivity Study relating to Character Area 19: Vale of St. Albans

²² Cllr Susman Statement

- but I accord this harm considerable importance and weight because of the national importance and exceptional interest of this heritage asset. Under such circumstances, paragraph 208 of the framework advises that this harm should be weighed against the public benefits of the proposal.
- 61. In this instance those public benefits are in the form of extensive and free of charge public access to the Dome which is of considerable benefit to the participants and their families. I consider that these benefits are collectively sufficient to outweigh the identified less than substantial harm to the significance of Salisbury Hall.

If the development is inappropriate, whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify the development within the Green Belt

- 62. The government attaches great importance to the Green Belt as set out in the Framework. Substantial weight is attached to any harm to the Green Belt by reason of inappropriateness and any other harm arising from the proposal.
- 63. The appeal scheme is inappropriate development and there would be harm to openness. The development would also cause less than substantial harm to the heritage asset, albeit I have found that the public benefits of the scheme outweigh the identified harm to heritage asset.
- 64. I have found some limited landscape harm resulting from the appeal scheme, despite mitigation proposed by the appellant.
- 65. The determination of whether very special circumstances exist is a matter of planning judgement based on a consideration of all relevant matters. However, very special circumstances cannot exist unless the harm to the Green Belt, and any other harm, is clearly outweighed by other considerations. Therefore, in this case, it is whether the other considerations, specifically the community use, biodiversity and the academy, taken together would outweigh the Green Belt and landscape character harms not just marginally, but decisively.
- 66. Overall, I have considered the totality of the other considerations of community use, biodiversity and the academy. In this case the totality of the other considerations do clearly outweigh the combined weight of the harm to the Green belt and any other harm, including harm to the landscape character. Consequently, the very special circumstances necessary to justify the development do exist.

Conditions

- 67. I have considered the conditions agreed between the parties against the relevant guidance contained within the Planning Practice Guidance (the PPG). Where necessary, I have amended them because the consent is sought retrospectively, in the interests of precision and so that they meet the relevant tests as set out in paragraph 56 of the Framework.
- 68. It is necessary to secure the extensive public access to the Dome via a scheme of community use as this is fundamental to the acceptability of the appeal proposal [1i].

- 69. I have reduced the time for the submission of such a scheme from 6 to 3 months because this is an essential public benefit of the Dome. I have removed reference to Watford Football Club Community Sports and Education Trust because it is not relevant to planning whether or not access is provided directly or through a charitable trust. Furthermore, I have removed reference to 'local voluntary and community groups' because this specificity is not necessary and may be taken to exclude some groups currently using the Dome.
- 70. The requirement for schemes relating to a landscape scheme [1ii] including a management plan and timetable for implementation is necessary in the interests of the character of the area and the environment [1ii]. Also, in the interests of the environment I have included condition relating to biodiversity enhancements [1iii].
- 71. I have included the suggested condition controlling the use of the Dome, restricting it to recreation and sport uses [2] in the interests of clarity and to define the permission.

Conclusion

- 72. I have concluded above that, for this appeal, very special circumstances exist to justify inappropriate development in the Green Belt. I have found that the less than substantial harm to the significance of Salisbury Hall is outweighed by the public benefits of the appeal scheme. My finding of some limited harm to landscape character in my consideration of other matters, is also outweighed by the public benefits of the appeal scheme.
- 73. Consequently, for the reasons given above, and having considered all other matters raised, I conclude that the appeal should be allowed subject to the attached schedule of conditions.

Mr M Brooker

INSPECTOR

Schedule of Conditions

- 1) The building hereby permitted shall be removed and all equipment and all the materials resulting from the demolition shall be removed within 30 days of the date of failure to meet any one of the requirements set out in i) to vi) below:
 - i) Within 3 months of the date of this decision a scheme for community use of the Dome shall have been submitted for the written approval of the local planning authority and the scheme shall include a timetable for its implementation.
 - ii) Within 3 months of the date of this decision a scheme of landscaping, including a landscape management plan, shall have been submitted for the written approval of the local planning authority and the scheme shall include a timetable for its implementation.
 - iii) Within 3 months of the date of this decision a scheme of biodiversity enhancements, outlined in the 'Watford Football Club Biodiversity Strategy' and including a management plan, shall have been submitted for the written approval of the local planning authority and the scheme shall include a timetable for its implementation.
 - iv) If within 11 months of the date of this decision the local planning authority refuse to approve the schemes or fail to give a decision within the prescribed period, an appeal shall have been made to, and accepted as validly made by, the Secretary of State.
 - v) If an appeal is made in pursuance of v) above, that appeal shall have been finally determined and the submitted scheme shall have been approved by the Secretary of State.
 - vi) The approved scheme shall have been carried out and completed in accordance with the approved timetable.

Upon implementation of the approved schemes specified in this condition, those schemes shall thereafter remain in use.

In the event of a legal challenge to this decision, or to a decision made pursuant to the procedure set out in this condition, the operation of the time limits specified in this condition will be suspended until that legal challenge has been finally determined.

The premises shall be used for recreation and sport uses and for no other purpose (including any other purpose in Class Sui Generis of Part 3 of the Schedule to the Town and Country Planning (Use Classes) Order 2015, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification)

End of schedule

APPEARANCES

FOR THE APPELLANT:

Mr Hashi Mohamed of Counsel instructed by James Callaway for Watford Football Club

He called:

Ms Ruth Bishop BSc (Hons) MA CMLI

Mr Richard Walker, Head of Communications & Media Relations, Watford Football Club

Mr Steven Handforth BA (Hons) MSc, IHBC

Mr Wesley Ankrah, Social Value Director, Savills (UK) Ltd

Mr Nick Green BA (Hons) MRTPI

FOR THE LOCAL PLANNING AUTHORITY:

Mr Josef Cannon KC, instructed by Harvey Patterson, solicitor to the Council Dr Lois Lane

He called:

Mr Peter Radmall Ms Emily Stafford

INTERESTED PARTIES:

Mr David Hyman Ms Becca Citroen Councillor Susman Mr Alan Lau Mr Nick Light Mr Lincoln Tapper

DOCUMENTS

- ID1 Opening Statement for the Council
- ID2 Opening Statement for the appellant
- ID3 Statement by Nick Light
- ID4 Statement by Cllr Susman
- ID5 Brentford FC Planning Documents ID3 Closing Statement for the Council
- ID6 Closing Statement for the Council
- ID7 Closing Statement for the appellant

PHOTOGRAPHS

ID8 Photographs from Cllr Susman

CORE DOCUMENTS

https://savillsglobal.app.box.com/s/l35vjg7t6dbgd2jcn99a72cbb4cmwte3