
Appeal Decisions

Inquiry held on 11 - 13 November 2014

Site visit made on 13 November 2014

by David Prentis BA BPI MRTPI

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

Decision date: 9 December 2014

Appeal A: APP/R0660/A/14/2215188

Appeal B: APP/R0660/E/14/2215195

Appeal C: APP/R0660/A/14/2223126

Appeal D: APP/R0660/E/14/2223127

Dingle Farm, Dingle Lane, Sandbach, Cheshire CW11 1FY

- The appeals are made by the beneficiaries of the estate of J M Goodwin Deceased against decisions of Cheshire East Council.
 - **Appeals A and C** are made under section 78 of the Town and Country Planning Act 1990 against refusals to grant planning permission.
 - **Appeals B and D** are made under section 20 of the Planning (Listed Buildings and Conservation Areas) Act 1990 against refusals to grant listed building consent.
 - **Appeal A** relates to an application Ref 12/2551C, dated 18 June 2012, which was refused by notice dated 18 October 2013.
 - The development proposed is alterations to an existing Grade II listed farmhouse, demolition of two outbuildings, conversion of barn into one dwelling, construction of 11 dwellings together with associated garaging, car parking and landscaping works.
 - **Appeal B** relates to an application Ref 12/2552C, dated 18 June 2012, which was refused by notice dated 18 October 2013.
 - The works proposed are alterations to an existing Grade II listed farmhouse, demolition of two outbuildings, conversion of barn into one dwelling, construction of 11 dwellings together with associated garaging, car parking and landscaping works.
 - **Appeal C** relates to an application Ref 14/0710C, dated 5 February 2014, which was refused by notice dated 11 June 2014.
 - The development proposed is alterations to an existing Grade II listed farmhouse, demolition of two outbuildings, conversion of barn into one dwelling, construction of 6 dwellings together with associated garaging, car parking and landscaping works.
 - **Appeal D** relates to an application Ref 14/0711C, dated 5 February 2014, which was refused by notice dated 11 June 2014.
 - The works proposed are alterations to an existing Grade II listed farmhouse, demolition of two outbuildings, conversion of barn into one dwelling, construction of 6 dwellings together with associated garaging, car parking and landscaping works.
-

Decision

1. The appeals are dismissed.

Application for costs

2. At the Inquiry an application for costs was made by the beneficiaries of the estate of J M Goodwin Deceased against Cheshire East Council. This application is the subject of a separate decision.

Preliminary matters

3. The Inquiry sat for 3 days from 11 to 13 November 2014. I carried out an unaccompanied visit to the site and its surroundings on 10 November 2014 and there was an accompanied site visit on 13 November 2014.
4. The Council and the appellants disagreed on the question of whether the Council can demonstrate a 5 year supply of housing land. Proofs of evidence had been prepared on this matter. Following a discussion at the beginning of the Inquiry the parties agreed that, in the particular circumstances of these appeals, consideration of the housing land supply issue would not have a material bearing on the outcome. This agreement was subsequently recorded in a Statement of Common Ground (SoCG) dated 12 November 2014. As a result of this agreement it was not necessary to hear evidence on housing land supply and the witnesses who would have dealt with this matter were not called¹.
5. Two unilateral undertakings (UU) under s106 of the Town and Country Planning Act 1990 were submitted at the Inquiry. The UU relating to Appeals A and B would provide for contributions to amenity open space, play facilities and highways works. As Appeals C and D relate to a smaller scheme, the Council's policies do not require contributions for open space and play facilities. Accordingly, the second UU would only make provision for a contribution to highways works. The Council submitted evidence² explaining how the contributions would meet the relevant tests. I am satisfied that the contributions would be necessary, reasonable and directly related to the proposed development and I have taken them into account in my decisions.

Main issue

6. Appeals A and B include 5 houses which are proposed on land to the north west of Dingle Lane. Appeals C and D do not include these 5 houses but in all other respects are the same. The proposed works to listed buildings are the same in all of the appeals. The single main issue for all of the appeals is the effect of the proposals on the special interest of the listed buildings and their settings within the Sandbach (Market Place, High Town and Chapel Street) Conservation Area.

Reasons

Site context and planning policy

7. The appeal relates to two parcels of land located on either side of Dingle Lane. The south eastern parcel comprises a farmhouse, a two storey barn, outbuildings and a paddock. The north western parcel is a paddock which slopes down to the lane. The site as a whole extends to around 0.67ha and is located close to the eastern edge of the town centre, the farmhouse being within 200m of the principal shopping area. There is housing to the west and south of the site. To the north is the open space of Sandbach Park and to the east is further open space at Dingle Lake.

¹ On day 2 of the Inquiry I was advised, as a matter of fact, that an interim report by the Inspector who was examining the Cheshire East Local Plan had been published. However, in view of the agreement reached, this report was not put before the Inquiry.

² Document 7 – The Community Infrastructure Levy Regulations 2010 Compliance Statement

8. Dingle Lane leads from the town centre to these areas of open space. It is a made-up road as far as its junction with Dingle Bank, at the western corner of the appeal site. Beyond that point the lane has the appearance of a farm track. Although not formally designated as a public right of way it is used as such. The historic maps from 1841 onwards show a track in this location. The written representations indicate that the lane is well used by pedestrians.
9. The development plan comprises the saved policies of the Congleton Borough Local Plan 2005 (LP). The site is within the settlement boundary of Sandbach where LP Policy PS4 states that there is a general presumption in favour of development provided it is in keeping with the town's scale and character and does not conflict with the other policies of the plan. The farmhouse and barn are within the Sandbach (Market Place, High Town and Chapel Street) Conservation Area (CA).
10. The examination of the Cheshire East Local Plan was taking place at the time of the Inquiry. Shortly before the Inquiry a decision had been made that a neighbourhood plan should be prepared for the parish of Sandbach. Neither the Council nor the appellants sought to rely on these plans.
11. The CA was designated in 1970 and has subsequently been extended. The original designation covered the area around St Mary's Church and the Market Square and there is a conservation area appraisal document (CAA) which dates from this time. There is also a draft Sandbach Conservation Area Character Appraisal and Management Plan (draft CAMP) which amongst other matters recommends that the CA boundary be extended to include part of the open land within the appeal site adjacent to the farmhouse and barn.

The heritage assets

12. Dingle Farmhouse is a Grade II listed timber framed building dating originally from the 17th century. It was subsequently extended to the north west (towards Dingle Lane) in stages, the most recent extension being in the 19th century. It was also extended to the north east in the 18th century and again in the 19th century. Dormer windows were added in the 19th century. There are also small 19th - 20th century lean-to extensions on the north eastern side of the building. The principal elevation faces south west towards the town centre. Dingle Farmhouse has considerable architectural interest as a well-preserved timber framed building, the plan form of which is still evident. The extensions show how the use of the building has evolved over time, in response to the needs of the occupiers. In general, and subject to my comments below in relation to the 19th - 20th century lean-to extensions, these extensions add to its interest and to its significance as a designated heritage asset. Internally, there are surviving fixtures which also contribute to the special interest and significance of the building.
13. The barn, or shippon, is a 19th century agricultural building erected for dairy farming. It is not listed in its own right but is a listed building by virtue of falling within the curtilage of the farmhouse. The boar pen is a small structure which is also listed by virtue of being within the curtilage of the principal listed building. These buildings add to the historic interest of the farmhouse in that, together with the farmhouse, they form a coherent farm group and they provide evidence about previous agricultural activities. There is also a cattle

shed and a further outbuilding to the east of the farmhouse and barn. These are modern buildings of no heritage significance.

14. The CA covers the historic core of the town including the Market Square and St Mary's Church. The CAA notes that this area has a pleasant country town atmosphere with narrow cobbled streets and black and white timbered buildings. It also notes that St Mary's Church stands on a spur boldly projecting into the valley of a little stream. Although this description was written several years ago I consider that it remains pertinent. The draft CAMP identifies the church as a key landmark within the CA. The view of the church from Dingle Lane is identified as an important view into the CA. The draft CAMP has yet to be adopted and so attracts limited weight as a statement of policy. Nevertheless, based on my observations on site, I agree with its assessment that the view from Dingle Lane is important in terms of the setting of the CA.

The effect of works to the listed buildings

15. The Council raised no objection to the conversion of the barn to a dwelling. I agree that the proposed works of conversion would be sympathetic to the character and appearance of the barn. They would not result in any loss of significance of the barn itself, nor would they harm the setting of the farmhouse. The proposals include retention of the boar pen but no specific works are proposed. The Council's objection was to the demolition of the north western gable end of the farmhouse, adjacent to Dingle Lane. Other proposed works to the farmhouse include the demolition of the 19th - 20th century lean-to extensions, some new windows, the replacement of some UPVC windows with new timber windows and internal works. The Council raised no objection to these other works and I see no reason to disagree.
16. The north western gable is within one of the 19th century extensions to the farmhouse³. It contains an enclosed timber staircase which appears to be contemporaneous with the extension. The Council and the appellants agree that this indicates that the house may well have been divided into two dwellings at this time. The extension is in brickwork and the south west elevation has been 'sham painted' black and white to match the striking black and white appearance of the older timber framed parts of the building.
17. The appellants considered that the north western extension is of low significance on the basis that it was an ad-hoc addition without aesthetic appeal. In my view this understates the value of the extension. Aesthetically, whilst it is not an example of polite architecture it has blended into the street scene and does not appear out of place. The appeal proposals would result in the loss of historic (19th century) fabric both externally, through the removal of a significant proportion of the brickwork forming the external walls, and internally through the removal of the staircase. Moreover, the extension shows how different building techniques were used at different times and also illustrates how the use of the building has evolved. The proposals would therefore result in a loss of evidential value.
18. It was suggested at the Inquiry that similar arguments could be used to justify the retention of any addition to a historic building, however inappropriate, thereby stifling change. However, such decisions are matters of judgement

³ No precise date has been suggested although the appellants describe it as a "late 19th century" addition.

depending on particular circumstances. In this case I would differentiate between the north western extension, which I consider has value for the reasons given above, and the 19th - 20th century lean-to extensions. To my mind these are obviously poor quality additions which clutter the north east elevation.

19. I conclude that the demolition of the north western gable would result in harm to the special interest of the listed building and a loss of its significance as a designated heritage asset. The proposals would also result in some heritage benefits, and other benefits, which are to be weighed against the harm. I return to that balance later in my decision.

The effect on the setting of listed buildings

20. The National Planning Policy Framework (the Framework) defines the setting of a heritage asset as the surroundings in which it is experienced. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. I consider that the appeal site, particularly that part of it to the south east of Dingle Lane, makes a positive contribution to the significance of the listed buildings at Dingle Farm and makes an important contribution to the ability to appreciate that significance. The open nature of the site allows the farmhouse, barn and boar pen to be seen together as a farm group. Moreover, the openness of the paddock recalls the agricultural fields which once extended to the north east from Dingle Farm. These features of the site enable the significance of the farm buildings to be fully appreciated.
21. The principal elevation faces south west over land which remained undeveloped until the 20th century. Modern housing development in this area has harmed the setting of the listed buildings on this side. However, this does not provide a sound reason for permitting further harm. The appellants pointed out that the site is no longer in the countryside and that the character of the area includes urban influences such as housing and an urban park. They also argued that the setting of the listed buildings has not always been as open as it is now. I agree that there are urban influences in the locality, including the house at No 7 Dingle Lane which is set prominently on a bank well above the level of Dingle Lane. Nevertheless, the view of the appeal site from Dingle Lane is, in the main, characterised by the openness of the land, the presence of former agricultural buildings and a backdrop of trees within adjoining open space at Dingle Lake. Although the site is within the urban area of Sandbach it retains a distinctly rural feel.
22. The historic maps show that the character of the site has changed over time. In the 1840s there were additional buildings attached to the north east side of the farmhouse. Later in the 19th century there was a sand pit extending to the north east of the listed buildings and in the 20th century there was a farmyard with rather more buildings than there are today. However, the Framework states that the extent of a setting is not fixed and may change as the asset and its surroundings evolve. The fact that the setting of these listed buildings has evolved does not, in my view, detract from the fact that the appeal site as it is today makes a positive contribution to the significance of the heritage asset.
23. The appeal schemes would introduce a terrace of houses spanning the width of the site which, together with garaging, would combine with the farmhouse and

barn to form a courtyard. The design intention is to create a sense of enclosure which is said to be characteristic of farmsteads seen elsewhere in Cheshire. It would still be possible to see the farmhouse and barn together in views from a short section of Dingle Lane. However, the experience of seeing the farm group in relative isolation across an open paddock would be lost. Moreover, the range of views experienced by people walking along the lane would be much reduced.

24. Seen in isolation, the proposed terrace would be attractively designed with projecting gabled bays and gabled dormers creating a lively and interesting appearance. Although it draws on design features found in the locality, the design does not seek to create the impression of converted farm buildings. The height of the terrace would be a little greater than that of the farmhouse. Due to its scale and design it would become the dominant feature in the immediate locality. As seen from Dingle Lane, the farmhouse and barn would be perceived as elements subsumed within a modern housing development comprising houses, garages, turning areas and garden boundaries. The boar pen would be left isolated from the other listed buildings because it would be out of sight behind the proposed garage blocks. The ability to experience the former farm buildings as a coherent group would be substantially diminished.
25. I understand that the concept of creating a courtyard with the feel of traditional farm complex was supported by the Council's officers. Nevertheless, I have come to my own view on the appropriateness of this approach.
26. The other new houses proposed on either side of Dingle Lane would be set further from the listed buildings and would therefore have less of an impact on their settings. Nevertheless, they would reinforce the sense of the listed buildings being contained within a modern housing layout and, to this extent, would add to the harm caused by the terrace and garage blocks. My overall assessment is that the proposals would be harmful to the setting of the listed buildings and would thereby detract from their significance as heritage assets.

The effect on the setting of the conservation area

27. As noted above, I agree with the assessment in the draft CAMP that the view of St Mary's Church from Dingle Lane is an important view into the CA. However, this is not merely a static view from a single viewpoint, it is a view which changes as one moves along the lane towards the town centre. Moreover, although the church is the focal point, it is by no means the only feature of visual importance. The skyline trees around the church, Dingle Lane itself, the paddocks, the farmhouse and the barn are all important components in the view. Taken together, these components form a particularly attractive composition. Moreover, I have commented above that the scene has a rural feel despite the fact that it is within the wider urban area. To my mind this view illustrates the close connection between the historic core of Sandbach and the agricultural land which once surrounded and supported it.
28. As seen from the viewpoint identified in the draft CAMP, the proposed terrace would obscure views of part of the church, part of the treed skyline, part of Dingle Farmhouse and the whole of the barn. The appellants argued that the proposed development would frame views of the church tower. However, the church tower is a focal point, not the whole view. The important view of the CA from Dingle Lane is a broader view which would not benefit from being framed in the way that is proposed. On the contrary, I consider that the loss of the

open view of the components referred to above would be harmful to the setting of the conservation area.

29. An additional consideration is the proposed works to Dingle Lane itself. I note that final details of paving materials could be subject to approval under a condition. Even so, it is clear that it would be necessary for the full width of the existing grassy track to be paved to provide access to the proposed houses. This would further erode the rural feel of this approach to the CA.
30. I conclude that the proposals would be harmful to the setting of the CA. The heritage benefits, and other benefits, discussed below are to be weighed against that harm.

Heritage benefits

31. Planning Practice Guidance (the Guidance) states that heritage benefits may include reducing or removing risks to a heritage asset and/or securing its optimum use in support of its long term conservation. The draft CAMP states that Dingle Farmhouse is at risk because it is an unoccupied timber framed building on the edge of the CA which is vulnerable to heritage crime incidents. Dingle Farm is currently unoccupied and the appellants argued that bringing it back into use would be an important public benefit. At the Inquiry it was explained that the farmhouse has been vacant since the death of the former occupier in December 2009. Although the building is not in a poor condition some works would be needed before it could be let. Consequently the building has remained vacant during the process of seeking planning permission⁴.
32. During my site visit I saw that the farmhouse and barn are in reasonable condition. Whilst any new occupier would no doubt seek to carry out some improvements, there is no evidence to suggest that the buildings are vacant because of their condition. The reason the buildings are empty is that their future is currently being determined through the planning process. Whilst bringing them back into use would be a benefit, in the particular circumstances of this case I regard this as a minor benefit.
33. I attach some weight to the proposed removal of the 19th - 20th century lean-to extensions. This would be beneficial because it would enable the timber framing on the north eastern elevation to be better appreciated. Some UPVC windows would be replaced with more sympathetic timber framed windows. Whilst this would be of benefit aesthetically, a relatively small number of windows would be involved and these are not in particularly sensitive locations. Consequently this would be a minor benefit. The appellants argued that the removal of the modern outbuildings would be a heritage benefit. These buildings are located close to the site boundary and do not impinge on the setting of the listed buildings to any great extent. In my view the proposed removal of these buildings would be a neutral factor.
34. Finally, the appellants argued that the potential for refurbishment and restoration of the listed buildings should be regarded as a positive factor. However, there were no specific proposals before the Inquiry and it was suggested that a schedule of repairs could be agreed under a condition. In the

⁴ This information was given orally by Mr De Figueiredo, for the appellants, during evidence in chief.

absence of any evidence of the extent and nature of works of repair very little weight can be attached to this suggested benefit.

35. In summary, the proposed removal of the 19th - 20th century lean-to extensions would be a benefit to which some weight should be attached. Whilst there would be some other heritage benefits these would be minor and attract only limited weight. Given that the listed buildings are within the CA, these benefits should also be weighed against the harm to the setting of the CA identified above.

Other benefits

36. Both appeal schemes would provide new housing in an accessible location close to the town centre of Sandbach. Bearing in mind the objective of the Framework to boost significantly the supply of housing this is an important consideration. Moreover, both schemes would contribute to employment and economic development during construction and, once occupied, through greater use of local services. Both schemes would attract a New Homes Bonus. The social and economic benefits associated with Appeals A and B would be proportionately greater because more houses would be delivered.

Other matters

37. There were several written representations objecting to the appeals. Many of these raised issues already covered above. Other matters of concern were highway safety, the loss of an oak tree which is subject to a Tree Preservation Order (TPO), impacts on wildlife and potential overlooking. There were also some representations of support, drawing attention to the need for new housing in the town centre.
38. The proposals for Dingle Lane have been subject to a safety audit, the results of which have been accepted by the highway authority. The UUs would make provision for a contribution to cover traffic regulation orders and road marking. This would include the creation of a priority junction such that vehicles emerging from the appeal site would be brought to a halt in a position where they would have a clear view of any vehicles negotiating the steeply sloping section of Dingle Bank. Final details of the highway layout could be secured by a condition. Subject to such a condition, the proposals would not be harmful to highway safety.
39. The canopy of the oak tree, which is covered by a TPO, has been severely reduced no doubt as a consequence of its proximity to No 5 Dingle Lane. As a result the tree has limited amenity value and, subject to a suitable replacement being secured by condition, its loss would not be harmful to the character and appearance of the area.
40. Ecological surveys were submitted with the applications which identified potential impacts on breeding birds and the presence of bats within the barn. All UK species of bats are protected species. The ecological surveys included mitigation measures for ecological impacts which could be secured by a condition. The Council has no objection to this approach and I see no reason to take a different view.
41. The design and layout of the scheme has taken account of the need to protect the living conditions of nearby residents. There would be sufficient separation

between the proposed houses and existing properties to avoid any harmful overlooking.

42. For Appeals A and B the UU would provide mitigation for any additional demands on open space and play facilities arising from the development in accordance with the Council's policies.
43. As noted above, the social and economic benefits of providing additional housing are important matters to be weighed in the balance. The other matters discussed in this section of my decision do not attract significant weight either for or against the appeals.

Conclusions

44. The proposals would result in harm to the significance of Dingle Farmhouse, a designated heritage asset⁵. The direct effects on the farmhouse would not harm the most sensitive parts of the building nor would they result in the loss of its most important features. Nevertheless, there would be a loss of historic fabric and a loss of evidential value in relation to the evolution of the building. I consider that the degree of impact on the significance of the heritage asset as a whole would be towards the lower end of the spectrum of less than substantial harm. Nevertheless there would still be an appreciable loss of significance.
45. I consider that the harm to the setting of the farm group would have a greater impact on its significance. In the terms of the Framework, the degree of harm, including direct effects and effects on setting, would still be less than substantial. However, this does not mean that the harm would be minor or unimportant. The Framework states that heritage assets are an irreplaceable resource and emphasises the desirability of sustaining and enhancing their significance.
46. The proposals would also cause harm to the setting of the CA. The degree of harm to the CA as a whole would also be less than substantial but there would nevertheless be a significant adverse effect on an important view into the CA.
47. Where there is less than substantial harm to the significance of a designated heritage asset, paragraph 134 of the Framework requires the harm to be balanced against the public benefits of the proposal, including securing its optimum viable use. Whilst bringing the buildings back into use would be a benefit, I have concluded that, in the particular circumstances of this case, this would be a minor benefit. The removal of the 19th - 20th century lean-to extensions would be a benefit to which some weight should be attached. There would be some other heritage benefits but these would be relatively minor and attract only limited weight. I attach greater weight to the social and economic benefits of providing new housing in an accessible location. Having regard to the objective of the Framework to boost significantly the supply of housing these are important considerations. The social and economic benefits associated with Appeals A and B would be greater because more housing would be delivered.

⁵ In this context the designated heritage asset is the listed building which includes its associated curtilage listed buildings

48. My overall assessment, in respect of all four appeals, is that the public benefits would be insufficient to outweigh the loss of significance that would be caused to the designated heritage assets. The conclusion is the same whether the listed building⁶ and the CA are considered individually or together. The proposals are therefore contrary to the policies in the Framework dealing with the conservation of the historic environment.
49. I have had regard to the presumption in favour of sustainable development set out in paragraph 14 of the Framework. In this case, as I have concluded that the proposal would not accord with policies in the Framework relating to heritage assets, that presumption does not apply⁷.
50. My conclusion in relation to the LP is that Appeals A and C would conflict with Policies GR1 and GR2, which seek to protect the character and appearance of the area, and with Policy BH4 which seeks to protect listed buildings. Appeals B and D would conflict with Policies BH4 and BH5. Policy BH5 also seeks to protect listed buildings. The presumption in favour of development in Policy PS4 is conditional on compliance with the other policies in the plan so does not apply in this case.
51. In relation to the statutory duties which require me to have special regard to the desirability of preserving a listed building and its setting⁸, I conclude that any heritage benefits would be insufficient to outweigh the harm I have identified. The proposals would be harmful to the special interest of Dingle Farmhouse and would fail to preserve its setting.
52. I have considered all other matters raised but have found nothing that alters my conclusions on the main issue. For the reasons given above, the appeals should not be allowed.

David Prentis

Inspector

⁶ The listed building includes its associated curtilage listed buildings

⁷ See footnote 9

⁸ The Planning (Listed Buildings and Conservation Areas) Act 1990 - s66 in respect of Appeals A and C and s16 in respect of Appeals B and D

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

John Hunter	of Counsel, instructed by Emery Planning
He called	
Peter De Figueiredo	Heritage consultant
DipArch MA(Urban Design) RIBA IHBC	
Rawdon Gascoigne	Director, Emery Planning
BA(Hons) MRTPI	

FOR THE APPELLANTS:

Scott Lyness	of Counsel, instructed by the Solicitor to the Council
He called	
Emma Fairhurst	Conservation and Design Officer, Cheshire East Council
BSc MA MSc	
Ben Haywood	Major Applications Team Leader, Cheshire East Council
BA(Hons) MA MBA	
MRTPI MCMi	

INTERESTED PERSONS:

Cllr Barry Moran	Cheshire East Councillor and Sandbach Town Councillor
Cllr Michael Benson	Sandbach Town Councillor
<i>Local residents:</i>	
Richard Stanford	
Fiona Byrne	
Jean Hood	
Abbie Selby	
Dr Tony Bastock	

DOCUMENTS SUBMITTED DURING THE INQUIRY

- 1 List of appearances for the appellants
- 2 List of appearances for interested parties opposing the appeal
- 3 Opening submissions for the appellants
- 4 Opening submissions for the Council
- 5 Draft s106 undertaking (Appeals A and B)
- 6 Draft s106 undertaking (Appeals C and D)
- 7 Community Infrastructure Levy Regulations Compliance Statement
- 8 Statement of Common Ground (SoCG)
- 9 Email from Mr Hallam of 7 October 2013
- 10 Revised list of appearances for interested parties opposing the appeal
- 11 Cllr Moran's statement
- 12 Cllr Benson's statement
- 13 Fiona Byrne's statement
- 14 Richard Stanford's statement

- 15 Abbie Selby's statement
- 16 Tony Bastock's statement
- 17 Jean Hood's statement
- 18 Photograph submitted by Peter De Figueiredo
- 19 English Heritage document *The Setting of Heritage Assets*
- 20 Draft Sandbach Conservation Area Character Appraisal and
Management Plan
- 21 Sandbach Conservation Area Appraisal
- 22 Unilateral Undertaking dated 12 November 2014 (Appeals A and B)
- 23 Unilateral Undertaking dated 12 November 2014 (Appeals C and D)
- 24 Letter from Glynn Robinson
- 25 List of suggested conditions
- 26 Chronology of discussions on SoCG submitted by the appellants
- 27 Bundle of emails relating to SoCG submitted by the Council
- 28 Closing submissions for the Council
- 29 Closing submissions for the appellants
- 30 *Nicholas Perry v London Borough of Hackney* [2014] EWHC 3499
- 31 Submission on costs for the appellants
- 32 Submission on costs for the Council
- 33 Note on building heights agreed by the Council and the appellants

Richborough Estates