

**Commons Act 2006: Section 15****Application for the registration of land as a Town or Village Green**

Official stamp of registration authority  
indicating valid date of receipt:

Vale of Glamorgan Commons  
Registration Authority

14 December 2021

Application number: 01/2021

Register unit No(s): VG51

VG number allocated at registration:

(CRA to complete only if application is successful)

**Applicants are advised to read the 'Guidance Notes for the completion of an Application for the Registration of land as a Town or Village Green' and to note the following:**

- All applicants should complete questions 1–6 and 10–11.
- Applicants applying for registration under section 15(1) of the 2006 Act should, in addition, complete questions 7–8. Section 15(1) enables any person to apply to register land as a green where the criteria for registration in section 15(2), (3) or (4) apply.
- Applicants applying for voluntary registration under section 15(8) should, in addition, complete question 9.

**1. Registration Authority**

To the

The Vale of Glamorgan Council

**Note 1**

*Insert name of  
registration  
authority.*

**Note 2**

*If there is more than one applicant, list all names. Please use a separate sheet if necessary. State the full title of the organisation if a body corporate or unincorporate.*

*If question 3 is not completed all correspondence and notices will be sent to the first named applicant.*

**Note 3**

*This question should be completed if a solicitor is instructed for the purposes of the application. If so all correspondence and notices will be sent to the person or firm named here.*

**2. Name and address of the applicant**

Name:

**Full postal address:**

Postcode

Telephone number:   
(incl. national dialling code)

Fax number:   
(incl. national dialling code)

E-mail address:

**3. Name and address of solicitor, if any**

Name:

Firm:

**Full postal address:**

Post code

Telephone number:   
(incl. national dialling code)

Fax number:   
(incl. national dialling code)

E-mail address:

**Note 4**

*For further advice on the criteria and qualifying dates for registration please see section 4 of the Guidance Notes.*

*\* Section 15(6) enables any period of statutory closure where access to the land is denied to be disregarded in determining the 20 year period.*

**4. Basis of application for registration and qualifying criteria**

If you are the landowner and are seeking voluntarily to register your land please tick this box and move to question 5.

Application made under section 15(8):

If the application is made under section 15(1) of the Act, please **tick one** of the following boxes to indicate which particular subsection and qualifying criterion applies to the case.

Section 15(2) applies:

Section 15(3) applies:

Section 15(4) applies:

If section 15(3) or (4) applies please indicate the date on which you consider that use as of right ended.

If section 15(6)\* applies please indicate the period of statutory closure (if any) which needs to be disregarded.

**Note 5**

The accompanying map must be at a scale of at least 1:2,500 and show the land by distinctive colouring to enable it to be clearly identified.

\* Only complete if the land is already registered as common land.

**Note 6**

It may be possible to indicate the locality of the green by reference to an administrative area, such as a parish or electoral ward, or other area sufficiently defined by name (such as a village or street). If this is not possible a map should be provided on which a locality or neighbourhood is marked clearly.

**5. Description and particulars of the area of land in respect of which application for registration is made**

Name by which usually known:

Answer Glebe Fields, Sully  
Plan Scale 1 : 2500 edged green Tab 1  
OS Map Reference ST1568SW

Location:

Land adjoining the Church Hall, Hayes Lane, Sully  
Land Registry part of Title Number CYM32218 shown edged green on attached plan  
Ordnance Survey Map Reference ST 1568SW

Shown in colour <sup>(edged green)</sup> on the map which is marked and attached to the statutory declaration.

Common land register unit number (if relevant) \*

**6. Locality or neighbourhood within a locality in respect of which the application is made**

Please show the locality or neighbourhood within the locality to which the claimed green relates, either by writing the administrative area or geographical area by name below, or by attaching a map on which the area is clearly marked:

The Glebe Fields are located within the neighbourhood or village of Sully within the Sully Ward of Sully and Lavernock Community Council  
Neighbourhood map Appendix Tab 2 - edged red  
Locality Map community Council - appendix Tab 3 edged orange

Tick here if map attached:

**7. Justification for application to register the land as a town or village green**

**Note 7**

*Applicants should provide a summary of the case for registration here and enclose a separate full statement and all other evidence including any witness statements in support of the application.*

*This information is not needed if a landowner is applying to register the land as a green under section 15(8).*

*Please See Statement of Stephen Paul Thomas attached hereto*

**Note 8**

*Please use a separate sheet if necessary.*

*Where relevant include reference to title numbers in the register of title held by the Land Registry.*

*If no one has been identified in this section you should write "none"*

*This information is not needed if a landowner is applying to register the land as a green under section 15(8).*

**Note 9**

*List all such declarations that accompany the application. If none is required, write "none".*

*This information is not needed if an application is being made to register the land as a green under section 15(1).*

**Note 10**

*List all supporting documents and maps accompanying the application. If none, write "none"*

*Please use a separate sheet if necessary.*

**8. Name and address of every person whom the applicant believes to be an owner, lessee, tenant or occupier of any part of the land claimed to be a town or village green**

<u>FREEHOLDERS</u>	<u>LESSEES</u>
The Vale of Glamorgan as Trustee for the Welsh Church Fund Civic Office Holton Road Barry CF63 4RH (Owners)  Title Number CYM322218 (part)	Sully Centurions Cricket Club c/o No 3 Simithies Avenue Sully Vale of Glamorgan CF64 5SS (Lessees)  Title Number CYM 444413

**9. Voluntary registration – declarations of consent from ‘relevant leaseholder’, and of the proprietor of any ‘relevant charge’ over the land**

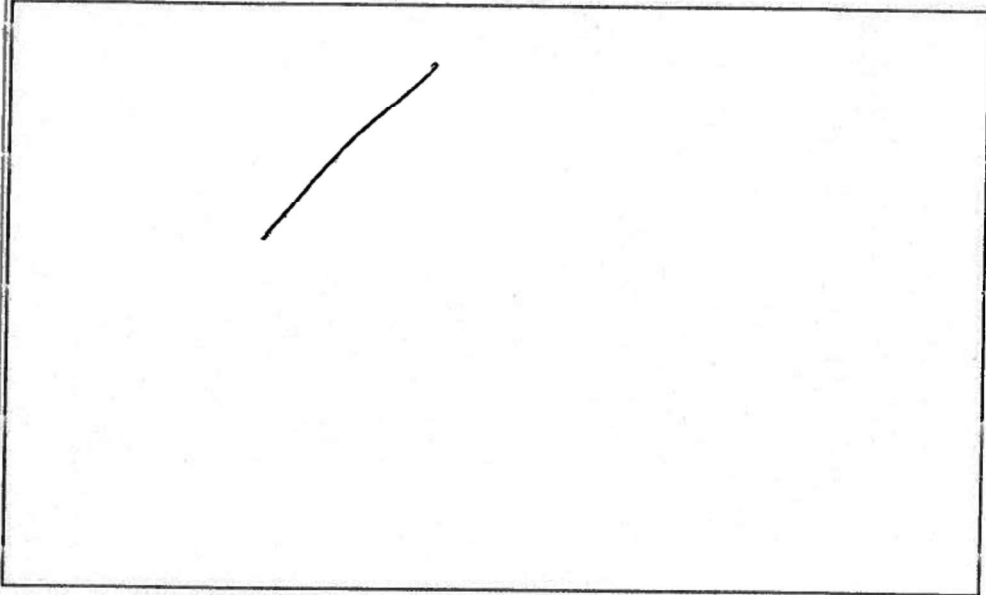
**10. Supporting documentation**

Map showing Application Site Appendix Tab 1  
 Map showing Neighbourhood Appendix Tab 2  
 Map showing locality Appendix Tab 3  
 Map showing Points Appendix Tab 4  
 Copy witness statements numbered S1 - S21 Index Appendix Tab 5  
 Map showing where witnesses come from Appendix 6  
 Further street Map of village of Sully Appendix 7  
 Title Number CYM 444313 Appendix 8

**Note 11**

*If there are any other matters which should be brought to the attention of the registration authority (in particular if a person interested in the land is expected to challenge the application for registration). Full details should be given here or on a separate sheet if necessary.*

**11. Any other information relating to the application**



**Note 12**

*The application must be signed by each individual applicant, or by the authorised officer of an applicant which is a body corporate or unincorporate.*

Date:

16<sup>th</sup> November 2021

Signatures:



**REMINDER TO APPLICANT**

**You are advised to keep a copy of the application and all associated documentation. Applicants should be aware that signature of the statutory declaration is a sworn statement of truth in presenting the application and accompanying evidence. The making of a false statement for the purposes of this application may render the maker liable to prosecution.**

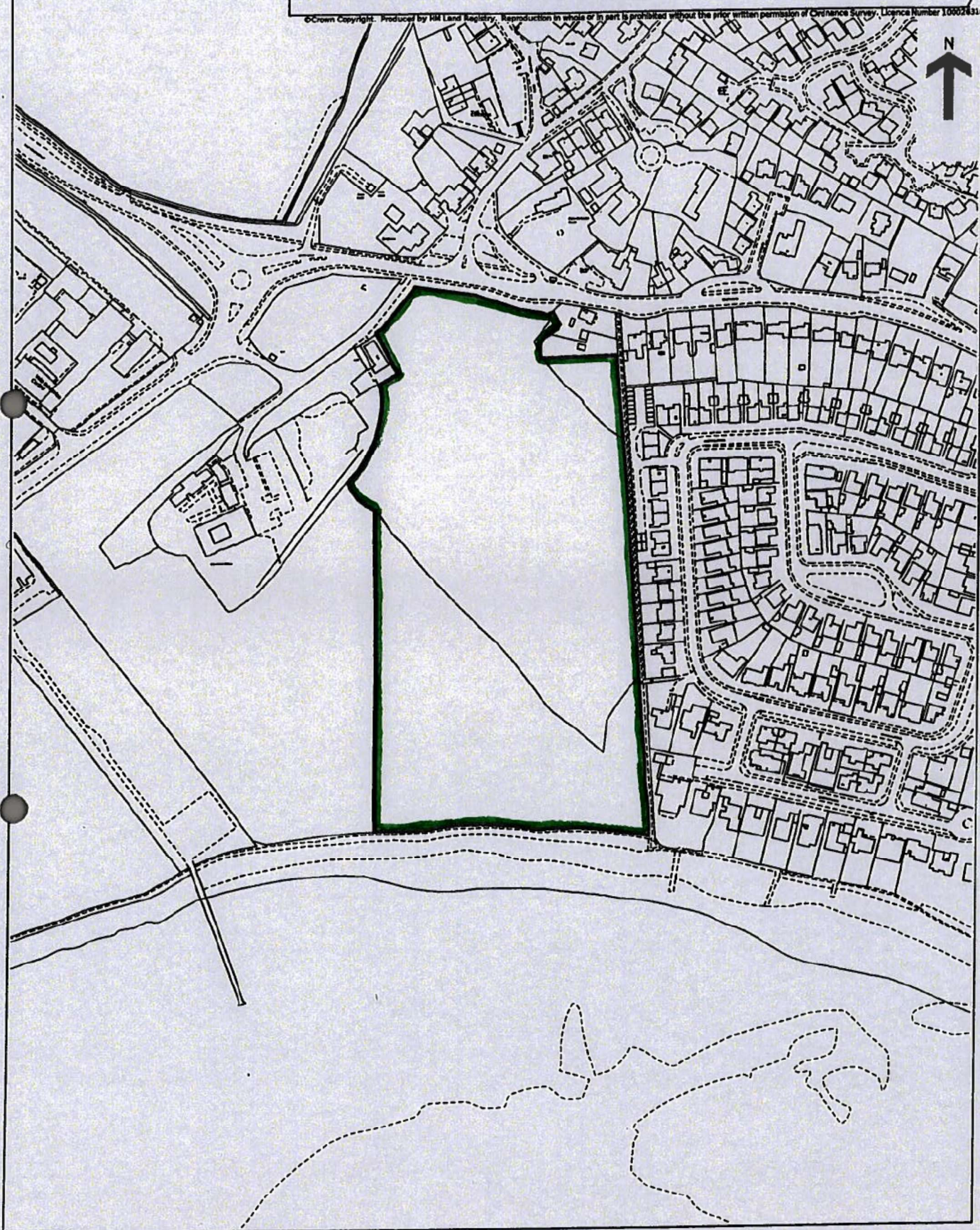
**Data Protection Act 1998**

*The application and any representations made cannot be treated as confidential. To determine the application it will be necessary for the registration authority to disclose information received from you to others, which may include other local authorities, Government Departments, public bodies, other organisations and members of the public.*

HM Land Registry  
Official copy of  
title plan

Ordnance Survey map reference **ST1568SW**  
Scale **1:2500**  
Administrative area **The Vale of Glamorgan**  
**/ Bro Morgannwg**

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## Statutory Declaration In Support

To be made by the applicant, or by one of the applicants, or by his or their solicitor, or, if the applicant is a body corporate or unincorporate, by its solicitor, or by the person who signed the application.

<sup>1</sup> Insert full name (and address if not given in the application form).

I Stephen Paul Thomas .....,<sup>1</sup> solemnly and sincerely declare as follows:—

<sup>2</sup> Delete and adapt as necessary.

1.<sup>2</sup> I am ((the person ~~one of the persons~~) who (has) ~~(have)~~ signed the foregoing application)) ~~((the solicitor to (the applicant) (one of the applicants))~~). RJA

<sup>3</sup> Insert name if Applicable

2. The facts set out in the application form are to the best of my knowledge and belief fully and truly stated and I am not aware of any other fact which should be brought to the attention of the registration authority as likely to affect its decision on this application, nor of any document relating to the matter other than those (if any) mentioned in parts 10 and 11 of the application.

3. The map now produced as part of this declaration is the map referred to in part 5 of the application.

<sup>4</sup> Complete only in the case of voluntary registration (strike through if this is not relevant)

4.<sup>4</sup> I hereby apply under section 15(6) of the Commons Act 2006 to register as a green the land indicated on the map and that is in my ownership. I have provided the following necessary declarations of consent: RJA

(i) a declaration of ownership of the land: RJA  
(ii) a declaration that all necessary consents from the relevant leaseholder or proprietor of any relevant charge over the land have

Cont/

4 Continued

been received and are exhibited with this declaration, or  
(ii) where no such consents are required, a declaration to that effect. RJA

And I make this solemn declaration, conscientiously believing the same to be true, and by virtue of the Statutory Declarations Act 1835.

Declared by the said Stephen Paul THOMAS

at 23, Winsford Road,  
Sully, Vale of Glam.

this 16<sup>th</sup> day of November  
2021



Signature of Declarant

Before me \* LAYLA JANET ATTFIELD

Signature:



Address:

LAYLA ATTFIELD  
SOLICITOR  
23 WINSFORD ROAD  
SULLY CF64 6SA  
02920 530670

Qualification: Solicitor

\* The statutory declaration must be made before a justice of the peace, practising solicitor, commissioner for oaths or notary public.

Signature of the statutory declaration is a sworn statement of truth in presenting the application and accompanying evidence.

**REMINDER TO OFFICER TAKING DECLARATION:**

*Please initial all alterations and mark any map as an exhibit*

**Application for the Registration of Land as Town or Village Green – Form 44**

**Land known as Glebe Fields (the 'Application Lands'), Sully (shown edged green on Plan – Appendix Tab 1)**

**Answers to Question 7 of Form 44**

**Justification for Application to Register land as Town or Village Green**

- 1.1. My full name is Stephen Paul Thomas.
- 1.2. I am Chair of the group called 'Saving Sully and Lavernock Group' which was set up to identify opportunities beneficial to the communities of Sully and Lavernock.
- 1.3. I make the application on behalf of myself, the supporters who have completed Questionnaires as I refer to below and of the Saving Sully and Lavernock Group.
- 1.4. I have lived in Sully for over 21 years, firstly at 9 Dunster Drive, for five years, and then for the last 16 years I have lived at 21 Clevedon Avenue, Sully, CF64 5SX.
- 1.5. I will refer to my own personal use of the lands the subject of the Application later in this statement.
- 1.7. This Application is made on the basis of use by a significant number of the inhabitants of the neighbourhood of Sully within the locality of the Community Council of Sully and Lavernock who have used the lands the subject of this Application, and indulged in lawful sports and pastimes for a period in excess of 20 years. Evidence is also given of use by myself (see below) and by the said inhabitants for lawful sports and pastimes; evidence is given going back as far as 1955 – see Questionnaires numbered S1- S23 at **Tab 5**.
- 2.1. The Application is in respect of the lands edged in green on the map attached to this Application Form 44 and paragraph 3 of the Statutory Declaration and also at **Tab 1** of the Appendix accompanying this Application. This land falls within the title number CYM444313 and is held in the ownership of the Vale of Glamorgan Council, said to be as Trustees for the Welsh Church Fund (see Office Copy Entries of said entry at HM Land Registry) at **Tab 7**. I will refer to the land as the 'Application Land'. It consists of two grass areas divided by a hedge which runs roughly NW to SE, but through which there are wide gaps to allow easy access from one part to the other. The Application Land extends to 6.74 hectares (14.18 acres).
- 2.2. Access to the land has been obtained by inhabitants of the neighbourhood through a variety of entrances and access points.
- 2.3. Along the north side of the Application Land is a low iron railing fence running behind the pavement along South Road – access into the Application Land has been obtained by easily climbing over the fence.
- 2.4. On the east boundary of the Application Land is a public footpath (which I refer to below) – there are remnants of old wire fence and hedge along the east boundary of the Application Land with gaps and access places to access and egress the Application Land from the said public footpath.

- 2.5. On the south side there is an old overgrown hedge or trees and scrub, with many access places/gaps giving access/egress readily and at all times to the coastal path (a public right of footpath) which runs all along the south boundary. I refer to this in greater detail below.
- 2.6. On the north west point of the Application Land is the old entrance gate which I will refer to in further detail below.
- 2.7. On the west are open fields having easy access to public paths – the west fields are open to the Application Land, the fields to the west of the Application Land now form part of Beechwood College lands and are open for public access.
- 2.8.1 As mentioned above at 2.6. at the north west corner of the Application Land alongside the former Church Hall, there is access off the main road sometimes called Hayes Lane, through a gateway. From the first time I started walking on the fields over 20 years ago, that gate or gateway was always open, the gate was never locked. The gate became more and more dilapidated, but whether the gate was open or shut, there were gaps either side of the hanging post and shutting post where one could and did simply walk through.
- 2.8.2 A few years ago, probably something like five years ago, we heard there were a group of travellers parked nearby and it was feared that a similar occupation could be attempted on the Glebe Fields, i.e. the Application Land. I spoke to the then Clerk of the Community Council, and we took it upon ourselves to immediately get in touch with a local builder Richard Patton who contacted a company called 'Grab It' asking them if they could immediately supply stone boulders. They arrived within a matter of hours, and we were able to deposit them on the north west boundary either side of the gate, and indeed there was one placed in the middle of the gate to ensure that no trailers, vehicles or caravans could get on to the site (the Application Land). The builder also supplied some heras fencing which we put across open areas where vehicles could make an access and chained them to trees or to the boulders to make sure that vehicles couldn't enter. However, this didn't stop pedestrians entering because they could simply walk between the rocks as they continued to do, and the inhabitants of the neighbourhood continued to have pedestrian access onto the Application Land and that continues to this day. Sometime thereafter, a new gate was provided at the request of a local Ward Member by the Vale of Glamorgan Council. It was an iron bar which could be locked onto it's closing post but pedestrians, including the inhabitants of the neighbourhood, could simply walk either side of the gates through the gaps between the boulders or duck under the steel arm. Inhabitants of the neighbourhood have never been prevented from having access.
- 2.9. On the east side of the Application Land there is a public footpath (tarmacadamed) and from the west side of that, on at least two if not three places, there was direct access from that path into the Application Land. The path at its north end has access directly onto South Road, and also has an access path or alleyway from the adjoining housing estate to the east, i.e. Minehead Avenue, which allowed, all inhabitants from Minehead Avenue and the housing estate and residential areas beyond to have access through the housing estate onto this alleyway and the eastern public path footpath and then from there onto the Application Land.
- 2.10. All along the south side of the land is the public footpath known as the Coastal Path. Access along the south boundary of the land was obtained at all times by

said inhabitants through the many gaps in the hedge from the public footpath to the south.

- 2.11. Mr Robert Penrose at Questionnaire S10, has prepared a plan showing the access points which I also enclose at **Tab 6**. The gateway adjoining the former Church Hall is at point 1. Access from the path on the east side of the land through the gaps in the hedge/boundary are at points 2 and 3.

Points 4, 5, 6 and 7 are from the coastal path on the south through gaps in the hedge or scrub.

Mr Penrose has also indicated that access could also be obtained into the Application Land on the west side through points 12, 13 and 14, and then access could be obtained onto the Application Land at points 9 and 10 through gaps in the fence.

There are ample gaps for easy access to and from both areas part of the Application Land through the hedge which runs (in a northwest/southeast direction) through the middle of the Application Land.

Access to the land has been as of right for a period in excess of 20 years, ie using the definition of Lord Hoffmann in the House of Lords in the Sunningwell case, the use as being without force, without secrecy and without permission, (nec vi nec clam, nec precario).

- 3.1. The application is supported by 21 Questionnaires numbered S1 to S21, being Questionnaire forms prepared by the Open Spaces Society in support of a claim for registration as a new Town or Village Green under the terms of the Commons Act 2006.
- 3.2. These appear with an index at **Tab 5**. Attached to each Questionnaire is a copy of the plan showing the area of land in question and the rear of each of those plans is signed by the respective witness.
- 4.1. The neighbourhood from which the witnesses (inhabitants of the neighbourhood) come is that of the village of Sully, shown edged red on plan at **Tab 2**. This neighbourhood forms part of the legally recognised locality, namely the area of the Community Council of Sully and Lavernock.
- 4.2. The neighbourhood of the village of Sully is a cohesive neighbourhood and has all the facilities as shown in the Questionnaires. It has natural boundaries in that it is bordered by the sea to the south and surrounded green fields/agricultural field to the east and the north and by Barry Docks and the Hospital/Hayes Point to the west – there is no large residential community in Barry Docks and one would not consider Barry Docks to be part of the neighbourhood of Sully, nor would one consider or include the Hospital/Hayes Point to be part of the neighbourhood of Sully.
5. There have never been any signs indicating that the Application Land was private land or that access was forbidden, or prohibited, or that access was ever allowed by consent or licence.
- 6.1 In 2009, the Vale of Glamorgan Council granted a lease for a term of 25 years from the 1st April 2009 to Sully Centurions Cricket Club. That lease is registered at

HM Land Registry under title number CYM444313 - the lease being dated 1st April 2009. The land in that lease was described as an area referred to as 'the Glebe Fields' and was shown for illustrative purposes only edged red on a plan attached thereto. The permitted use under the lease was for the purpose of playing cricket with ancillary facilities. The Cricket Club were to carry out certain works within two years from the grant of appropriate planning permission in accordance with a Scheme of Works to be agreed in advance with the Council as landlord to establish cricket pitches on the land. The lease also required the tenants to enclose the premises with stock proof fencing and gates in accordance with the specifications to be agreed in writing in advance with the landlord. No such fencing was ever carried out and no such gating was ever carried out by the Cricket Club. I remember the Sully Centurions Cricket Club taking the lease of the field from Vale of Glamorgan Council. They had a grant to carry out works to level parts of the field to make a cricket pitch. They did indeed start levelling works and had earth moving machinery on site. The machinery worked normally from about 8.00/8.30am to about tea time. Sometimes the machines would be taken away in the evening, sometimes they would be left on site. There was never any fencing put up to stop access over the works that they had done or were undertaking. The work carried on intermittently, ie not every day, for a number of weeks. The area that had been set out as a cricket pitch was then sowed with seed (grass) and it was cut on a couple of occasions. No cricket was ever played, and neither the public nor the inhabitants of Sully were ever stopped from walking over the grass or over the earthworks prior to or even after the seeding of grass or over any part of the proposed pitch, or at any time thereafter.

- 6.2. The carrying out of the works did not exclude the inhabitants of Sully who would continue enjoying their right of access and indulging in the walking their dogs and generally enjoying air, exercise, and lawful sports and pastimes, and exercise, even whilst the machinery might have been working. Inhabitants from the neighbourhood of Sully had, and did indeed use, full access at all times to the land
- 6.3. Whilst the lease is still shown as being registered in the name of Sully Centurions Cricket Club at HM Land Registry, the earthworks for making the square or the outfield have never ever really been finished or completed, and no cricket has ever been played on the land and the inhabitants of Sully have never been excluded from the land by virtue of the lease or of any works carried out under that lease.
- 6.4. It is known that the lease has been relinquished by the Cricket Club and that no rent has been paid since the lease was relinquished. It is known that the Cricket Club are no longer in possession physically of the Application Land and no inhabitants have ever been excluded from the Application Land.
- 6.5. The Cricket Club members or committee, or representatives of the Cricket Club, were fully aware that at all times the Application Land was frequented by inhabitants of the neighbourhood for lawful sports and pastimes, ie walking their dog, playing informal games, picking seasonal fruit such as blackberries and other lawful activities, and no steps were ever taken by the Cricket Club to eject such persons or to indicate that they had no right of entry.
- 6.6. No buildings were ever erected by the Cricket Club by way of ground equipment huts, pavilions, changing rooms, nor was any part of any cricket ground or square ever completed, marked off or fenced off.

7. The Application Land has been infested at times, and from time to time, with noxious weeds such as ragwort, and from time to time, the Vale of Glamorgan Council presumably under the Noxious Weeds Act arranged for the ragwort to be cut and baled and taken away. That did not interfere with the access by the inhabitants of the neighbourhood to the said lands.

8. At all times, and from before 2001 (20 years prior to the date of the present application), inhabitants of the neighbourhood walked where they will over and across the Application Land. There is no public footpath recorded on the Definitive Map of Footpaths on or across the Application Land, although as mentioned above, there are registered footpaths on the east and south side from which access was obtained into the land and public roads or highway on the north west and north sides. Routes or areas of perambulation over and across the land might vary or be dependent on weather, long grass or noxious weeds, whether tracks have been trampled. Informal games such as informal ball games, football, cricket (but no wickets or goal posts) etc, were undertaken by inhabitants of Sully but no organised sport was ever undertaken so as to dissuade the inhabitants from wandering onto that pitch, or pitches whilst games were being played.

Informal activities such as picnics and informal community events such as birdwatching or nature watching was undertaken but this was not with any licence, leave or permission of the Vale of Glamorgan Council or their tenants,

9.1. As mentioned above, I have lived in Sully for over 20 years. I am very familiar with the Application Land.

9.2. My wife and I have always had dogs and we would, and still do, walk the dog twice every day; and most mornings with other dog walkers. We take them for different walks each day. A number of times each week, we end up taking them to and across the Application Land. I would walk from our house through the alleyway from Minehead Avenue leading to the public footpath which lies on the east side of the Application Land. There are openings from this public footpath on the east boundary of the Application Lands straight into the Application Land; or if one or more of them become temporarily blocked because of brambles, I then simply turn left to reach onto the coast path and then turn right and in about 20 feet or so there is easy access gap onto the Application Land, and thereafter, there are a number of access points through the hedge/boundary to the Application Land. I would walk across Application Land not necessarily in any set direction or path, but generally perambulating around and across the fields, usually ending up in the top north west corner coming out through the gateway adjoining the former Church Hall and then back home along the pavement of the main road - South Road. I have also enjoyed lawful walks with just my wife.

9.3. I confirm, therefore, that, personally, I have enjoyed lawful sports and pastimes, walking the dog and generally enjoying fresh air over the Application Land for a period in excess of 20 years. I have done this as of right in that have done it without force, without secrecy and without permission. No one has ever tried to stop me or prevent in any way my access. There has never been a person proof boundary around the land.

9.4. I have accessed and enjoyed use of the Application Land openly, at all times of the day and very often I meet other inhabitants of Sully who I know were also enjoying sports and pastimes on the field such as walking, or walking their dog, playing informal pastimes, kicking a ball etc.

- 9.5. No one has ever given me permission to access the land or, no one has ever tried to stop me and there have never been any signs upon or around any land or at the entrance point to the land forbidding access or saying that access was with permission of the landowner. As mentioned in paragraph 2.1, I am aware that the landowner is Vale of Glamorgan Council.
- 9.6. It will have been obvious to the landowner and from 2009, their tenants (the Cricket Club), that the Application Land was being used by persons; and although they may not have known where those persons came from, due to the layout of the Application Land in proximity to the layout of the adjoining neighbourhood of Sully and the fact that there were no other residential areas or no car parking facilities for people to use who might have come from outside the neighbourhood, it must have been obvious that the frequenters of the land were inhabitants from the neighbourhood, ie the local village of Sully and it would have been brought in upon them, ie it was signified to them that their land was being so used - particularly as paths could be seen which could have only been created by human footfall.
10. The Questionnaires S1 to S21 set out the usage that the inhabitants of the neighbourhood have undertaken
- Walking and meeting friends
  - Dog walking
  - Informal playing of ball games (no pitches or goal posts, just kick abouts) by the locals, jogging
  - Picking blackberries and other seasonal fruits
  - Picnicking, bird watching, kite flying, bicycle riding, children playing, drawing and painting, bonfire and other parties – even local children camping, and all as set out in the Questionnaires

all the things that the inhabitants of a neighbourhood do on a Village Green.

11. There is no evidence from the Questionnaires that the period of 20 years has not been achieved, and there has been no interruption or attempt to interrupt such user. It would be clear to the owner of the Application Land that the use by the inhabitants would be the assertion of a public right.
12. All of the Questionnaires have been given by inhabitants from the neighbourhood in the Village of Sully, and at **Tab 6** it is included a map showing where those suppliers of the Questionnaires live.
13. I enclose also for further help a plan with street names of the roads in Sully (**Tab 8**) – with the residential area coloured light mauve – the community buildings and schools are tinted light and dark green with the surrounding fields and agricultural and open lands tinted in light pink and yellow. The Application Land fully adjoining the residential areas and inhabitants of the village can and do obtain easy access to the beach and to the Application Land, and walking on the Application Land is not confined to any particular path or pathway and dogs can have much more freedom of running. People from the village can and do easily make their way to the Application Land and enjoy the openness of its facility. Even inhabitants from the streets to the north side of South Road have no difficulties in using and 'indulging as of right in lawful sports and pastimes' and continue to do so at the time of Application.



14. The Application Land is open, it is not overgrown with scrub or weeds so as to make it inaccessible and when walking, one is free to go and play anywhere, and dogs, again, will run anywhere they like amongst the wonderful open countryside of the Application Land.

Signed as a Statement of Truth  
by Stephen Paul Thomas



Dated

16<sup>th</sup> November 2021