

**SUMMARY OF PROOF OF EVIDENCE  
IN REBUTTAL TO THE APPELLANT'S EVIDENCE  
OF MRS S GORDON ON BEHALF OF BRIMPTON COMMON RESIDENTS'  
GROUP**

**In connection with appeals by  
Mr J Slater**

**Appeal A against the refusal of planning application reference 23/02984/FUL  
At land to the south of Brimpton Lane, Brimpton Common RG7 4RS for change  
of use to Gypsy/Traveller site comprising the siting of 1 mobile home and 1  
touring caravan.**

**PINS REFERENCE: APP/W0340/W/24/3346787**

1. I am Sarah Gordon. This is a summary of my proof of evidence, written on behalf of BCRG in rebuttal of the Appellant's evidence and that of Mr Brian Woods on the issues of status, personal circumstances, land ownership and precedent.
2. The BCRG confirm that they will not contest status, now that they have seen the Appellant's proof of evidence (albeit heavily redacted) and given the expanded definition of "Gypsy and Traveller" in the PPTS.
3. Redactions  
The extensive redactions made by the Appellant of his proof of evidence, statement of personal circumstances and three appendices are not justified and highly prejudicial to the BCRG. The BCRG respectfully suggest that large-scale redactions of evidence upon which the Appellant relies as a key part of his case are not fair, reasonable or transparent.
4. Personal Circumstances  
The Appellant's and his wife's public social media (which is limited) appears to paint a different picture from that portrayed in the Appellant's proof of evidence. Other elements of the proof are inaccurate.
5. Land Ownership  
The Appellant's agent (in his email dated 9 January 2024) stated that he had received confirmation from his client that **he** had purchased the site, but it was yet to transfer on Land Registry due to a long backlog. They had requested that he provided the TR1 which would display this on-going transfer. This statement was not true, and the transfer document was not provided.
6. The TP1 confirms that Mr Randolph Black purchased the appeal site from Strat Farm Land Limited on 20 October 2023 for £55,000 (simultaneously with the purchase by Strat Farm Land Limited of the wider field from the previous owner).

7. Following further enquiries of the Land Registry, it now appears that a further transfer was made of the ownership of plot D from Mr Randolph Black to the Appellant on 3 September 2024 and that an application was made to the Land Registry to register the change of ownership on the same date. The TR1 (received on 27 December 2024) showed the transfer which was “not for money or anything that has a monetary value”.

#### Precedent

8. The BCRG do not agree with Mr Woods that there is not “sufficient justification to rely upon precedent” (paragraph 6.75) and contend that there is ample evidence of co-ordination and common interests.
9. Land Registry documents confirm that on 20 October 2023 the entire field (under title number BK8916) was transferred from the previous owner (who had owned it since 1980) to Strat Farm Land Limited for £255,000. Strat Farm Land Limited is listed as a dormant company at Companies House. Its single share is owned by Strategic Land Holdings Limited, a company registered in the Isle of Man, which according to its UK website, invests in land with the intention of achieving an enhancement in value by obtaining planning permission. The ultimate owner(s) are not clear.
10. I was informed by the Land Registry that the only applications for transfers of title are in respect of Plots J and K (purchased by a resident of Brimpton Common), Plot C (purchased by a traveller) and plot E (purchased by a traveller who took part in the IUD in March 2024 and made an application for change of use to “Equestrian”).
11. There have been no applications to the Land Registry for transfers of plots A, B, F, G, H or I, which apparently remain in the name of Strat Farm Land Limited. This is surprising as (i) the BCRG were informed that plots A and B were owned by a man called Dean, who intended to put two mobile homes and ultimately houses on those plots; (ii) Plot F was the subject of planning application for a self-build house (24/01549/FUL), and (iii) An application (24/00594/FUL) for two Gypsy and Traveller pitches was made in relation to approximately half of plots G, H and I, using the same agents as the Appellant. Certificate B signed by the applicant (Mr Fred Ball) does not now appear to be accurate. A resident was told that these plots were owned by Mr Sam Black and Mr Tom Black, and the agent’s plans submitted with the application identify the client as ‘Black & Ball’.
12. This latest information strongly suggests that the entire field (with the exception of plots J and K) has been purchased with the objective of development. It has been clear to the BCRG that the owners have been working together around the whole field, not just the site.