

STATUTORY DECLARATION of DOMINIC CHARLES BATEMAN

I, DOMINIC CHARLES BATEMAN, of [REDACTED]
[REDACTED] DO SOLEMNLY AND SINCERELY DECLARE AS
FOLLOWS:

1. I make this Statutory Declaration in support of the application by Richard Turner and Carol Collins to remove The Hallams from the Register of Common Land.
2. In this statutory declaration I will refer to the application site known as The Hallams, Littleford Lane, Blackheath, Guildford GU4 8QZ as "the Property". This is shown edged in thick line on the plan at Tab 1 of Exhibit "DCB1" (referred to in this Statutory Declaration as "the Plan").

The history of the Property

3. I acted as Property Manager, Property Director and Estates Director with responsibility of all estates matters regarding the subject Property.
4. In around 1979, The GC Bateman Pension Scheme purchased the Property. I had full responsibility of the Property between 1979 and 2006. I handled the sale of the property on behalf of the Pension Scheme in 2006. I therefore have full knowledge of the Property at that time.
5. I have no knowledge prior to the Pension Scheme's ownership in 1979.

The boundaries of and buildings on the Property

6. When the GC Bateman Pension Scheme purchased the Property in around 1979 the boundary locations marked A-B-C-D on the Plan were present. The boundary was marked with a wall to the south of the Property and a post and rail or post and wire fence which ran along the remainder of the boundary. The boundary post and rail and post and wire fence remained in place throughout my management of the Property.
7. The access driveway marked E and shaded yellow on the Plan was the main public point of entry and access during the period which I managed the Property. A second gate for maintenance access only was located a few yards to the west of the main entrance. This second gate was always kept secure with a chain and padlock.

Use of the Property

8. We used the Property as offices with a residential flat for live-in caretakers.
9. I never saw anyone walking around the Property other than staff, guests or visitors to the Property.
10. The building on the Property shown hatched black on the Plan was present and used as offices with caretaker residential flat.
11. That part of the Property shown edged green on the Plan was either grass lawn, which we regularly maintained and kept trimmed or areas of flower beds, shrubs and ornamental trees. We used this area as a garden for staff to enjoy (or have lunch on picnic tables provided). When the GC Bateman Pension Scheme

purchased the Property in 1979 there was an informal swimming pool with changing rooms and an artist's studio to the east of the Property. The changing rooms and studio were still in place at the time the Property was sold. To the west of the green area there were the remains of a metal / iron fence running north from the southern boundary.

12. That part of the Property shown edged brown on the Plan comprised woods. We maintained this area including numerous pathways to enable colleagues to walk around and enjoy the rhododendron and specimen trees.
13. That part of the Property shown edged orange on the Plan comprised the access road and car parking...

Knowledge of Common Land

14. There was never any question raised of any common land when we purchased the Property, when I took on management of the Property and when the Property was placed on the market in 2005.
15. My first knowledge of the common land designation of part of the Property was when a potential purchaser discovered the common land designation on an on-line map in 2006. I had never heard of this previously, including throughout my management of the Property. Nobody had ever told me, for example, that they had a 'right of common' over this land. Neither did anyone ever allege that they had an entitlement to graze their animals over my land.

16. The boundary fencing was always maintained throughout my management of the Property.

AND I MAKE THIS SOLEMN DECLARATION conscientiously believing the same to be true and by virtue of the provisions of the Statutory Declarations Act 1835.

DECLARED by the aforesaid **DOMINIC CHARLES BATEMAN**

this 27TH day of NOVEMBER 2019

at ANDREW & LAW SOLICITORS

BEFORE ME

ANDREW KING

Signed

Solicitor/Commissioner

for

Oaths



Andrew & Law Solicitors
24B Coombe Road
New Malden, Surrey
KT3 4QE, United Kingdom
office@andrewlawsolicitors.com
DX 200904 New Malden

EXHIBIT DCB1

This is the Exhibit "DCB1" to the Statutory Declaration of **Dominic Charles Bateman**

Signed ...  ...

Dominic Charles Bateman

At ANDREW & LAW SOLICITORS

On 27TH NOVEMBER 2019

Before me: ANDREW KING

Signed 

Commissioner for Oaths/Solicitor empowered to administer Oaths



Andrew & Law Solicitors
24B Coombe Road
New Malden, Surrey
KT3 4QE, United Kingdom
office@andrewlawsolicitors.com
DX 200904 New Malden



STATUTORY DECLARATION of Darren Osborne

**I, Darren Osborne, of [REDACTED] DO
SOLEMNLY AND SINCERELY DECLARE AS FOLLOWS:**

1. I make this Statutory Declaration in support of the application by Richard Turner and Carol Collins to remove The Hallams from the Register of Common Land.
2. In this statutory declaration I will refer to the application site known as The Hallams, Littleford Lane, Blackheath, Guildford GU4 8QZ as "the Property". This is shown edged in a thick black line on the plan at Tab 1 of Exhibit "DO1" (referred to in this Statutory Declaration as "the Plan").

The history of the Property

3. I first started working at the Property at the age of 16 for Batemans as a gardener in 1986 working two days a week and have worked at the Property ever since.
4. At the time I started work at the Property it was the head office of Bateman Opticians and a flat where the housekeepers lived.
5. The Batemans sold the Property in 2006 to Tim Merrell who used the Property part of the year. Tim continued to employ me as the gardener.
6. Tim sold the Property in 2013 to Richard Turner and Carol Collins who live at the Property and I continue to maintain the grounds of the Property.

The boundaries of and buildings on the Property

7. The boundary of the Property was and is still a post and wire fence all around the Property. Until the last few years, I used to walk the boundary of the Property when doing maintenance work.
8. The main building known as The Hallams is shown hatched black on the Plan and has been present throughout my knowledge of the Property (since 1986 to present). The area of hardstanding surrounding the main building is shown shaded yellow on the Plan and has been present throughout my knowledge of the Property; it is and has been used as access and parking. The main entrance is shown shaded grey on the Plan; this has been the main entrance throughout my knowledge of the Property.
9. When I worked for the Batemans, my work was split into different areas of the grounds on different days. On Mondays I maintained the ornamental garden around the house that I have edged in green on the Plan. The ornamental garden was and still is made up of extensive flower beds, ornamental lawns and shrubberies. The ornamental garden was bordered on the west side by four foot high ornamental railings running from the steps at the boundary to Hallams Farm to at least the old beech tree on the west side of the front lawn. I have marked the line of the railings and the steps in red on the Plan. A path ran beside the railings and remained until a couple of years when it became overgrown due to our focus on other areas of maintenance.
10. When I started work, the ornamental gardens also included a swimming pool, changing room and art studio that I have marked on the Plan.

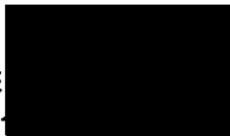
11. There were also two very large water tanks on the north side of the gardens (that I have also marked on the Plan). The tanks were at least 30 feet long, 20 feet wide and 20 feet deep. They had lots of pipework maybe for watering the grounds. There was a large number of standpipes spread around the Property.
12. Over the 33 years I have worked at the Property there have been some changes. I filled in the water tanks in around 2006. The swimming pool was filled in in the late eighties. The changing rooms were knocked down at that time and put into the pool that was grassed over as part of the lawn. The art studio was removed around 2002 and replaced with lawn. I took down the railings around the ornamental garden as they became dangerous. I also replaced the post and wire fence with a post and rail fence at the entrance.
13. When I worked for the Batemans, on Tuesdays I maintained the rhododendron walkways and ornamental woodlands which is the land outside of the green edging and the boundary of the Property as shown on the Plan. I maintained and planted new species of trees and rhododendrons and I walked the boundary checking no trees had fallen on the fence or were in danger of falling.
14. I have marked two extra entrances that we used when I started at the Hallams. The second entrance (marked "2 entrance" on the Plan) has also been used as an entrance throughout my knowledge of the Property; it connects to the area of hardstanding at the front of the main building as shown by a pink line on the Plan. The third entrance (marked "3 entrance" on the Plan) was used when we maintained the rhodo walks (up until the Batemans moved out).

15. The ornamental gardens had about 20 picnic benches used by the Batemans office staff at lunch times. These were dotted around the ornamental gardens surrounding the main building. The Batemans office staff also used the rhodo walks a lot at lunch times to stroll around and admire the rhododendrons and sculptures. During the period of the Batemans use of the Property, there were about ten sheds and three greenhouses on hardstanding bases dotted around the ornamental garden surrounding the main building. Some were used to store logs and the others were used by the painter, the plumber and the decorator, each having about two sheds. I had three sheds to keep my mower and other equipment in. Many of these sheds remained during the period from 2006-2013 but some were removed as they became run down. Only one further shed has been removed since 2013 and one of the three greenhouses has been removed.
16. Twice a year Bateman's would have art exhibitions in the house and grounds. Sculptures were dotted all around the Property – both the ornamental gardens and along the rhodo walks.
17. Some sculptures were left in the grounds all the year and I was inspired to do some chain saw art of my own around the rhodo walks from tree stumps that I turned into seats and sculptures.

Knowledge of Common Land

18. I have never been aware that any part of the Hallams was common land. The common land starts the other side of the Property boundary and people have never used the Property as common land in all the 33 years I have worked at the Property.
19. My first knowledge of the common land designation of part of the Property was when the current owners talked to me a few years ago. I have not known any one to claim this as common land and it has always been fenced in my time at the property.

AND I MAKE THIS SOLEMN DECLARATION conscientiously believing the same to be true and by virtue of the provisions of the Statutory Declarations Act 1835.

DECLARED by the aforesaid DARREN OSBORNE 

this 26 day of NOVEMBER 2019

DMH Stallard LLP
at Womersley House, The Guildway
Old Portsmouth Road
Guildford, Surrey, GU3 1LR

BEFORE ME CATHERYN CULVERHOUSE

Signed 

Solicitor/Commissioner for Oaths

EXHIBIT D01

This is the Exhibit "D01" to the Statutory Declaration of Darren Osborne

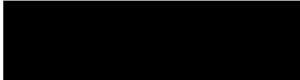
Signed 

[NAME] Darren Osborne ,

At DMH Stallard LLP
Womersley House, The Guildway

On Old Portsmouth Road
Guildford, Surrey, GU3 1LR 26 NOVEMBER 2019

Before me: CATHRYN CULVERHOUSE

Signed 

~~Commissioner for Oaths~~/Solicitor empowered to administer Oaths

Tab 1



STATUTORY DECLARATION of CAROL COLLINS

**I, CAROL COLLINS, of THE HALLAMS, LITTLEFORD LANE, BLACKHEATH, GUILFORD, SURREY, GU4 8QZ DO SOLEMNLY AND SINCERELY
DECLARE AS FOLLOWS:**

1. I make this Statutory Declaration in support of the application by Richard Turner and Carol Collins to remove The Hallams from the Register of Common Land.
2. In this statutory declaration I will refer to the application site known as The Hallams, Littleford Lane, Blackheath, Guildford GU4 8QZ as "the Property". This is shown edged by a thick black line on the plan at Tab 1 of Exhibit "[CC]1" (referred to in this Statutory Declaration as "the Plan").

The history of the Property

3. I have acquired knowledge of the history of the Property from various written documents and by talking with people who lived or worked here previously. The Hallams was built in 1895 as a residence for Charles Durant Hodgson and his family. It was designed by the renowned architect Richard Norman Shaw with input from Lutyens. At that time it formed part of a country estate of around 147 acres, including several cottages. The Hallams was approached by two long carriage drives winding up through the grounds from Littleford Lane and terminating in a wide carriage sweep. I understand that the position of the entrance gates and driveway has changed several times. In 1929 the estate was marketed for sale in 4 lots, the main residence with 36 acres of land. The gardens and grounds were described as well planted with coniferous trees, silver birches and other ornamental trees, with wide-spreading lawns surrounding the house. The Hallams continued to be used as a private residence up to the second world war when it temporarily housed a dance school evacuated from London and then the Canadian army before being returned to the owners. The Hallams went to market again in 1951 and at this point the main residence was sold together with the 12 acres of land it has today. The house was used both as a family home and a guest house by the Merritt family who were in residence until around 1979 when ownership changed to Batemans opticians. We understand it was then used as Batemans headquarters with some staff accommodation. In 2006 the Batemans sold the property and the new owner applied for change of use back to a domestic residence which was approved.

4. Richard Turner and I bought The Hallams in 2013 as a home for three generations of our family and to provide care in the home for our elderly parents. We are the current owners.

The boundaries of and buildings on the Property

5. When I purchased the Property in 2013 the boundary locations denoted by the thick black line on the Plan and marked A-B-C-D were present. The boundary was marked with either brick and stone walling, post and rail, or post and wire fencing. We have not removed any of the boundary markers.
6. The access driveway marked E and shaded yellow on the Plan has been the point of entry and access during the whole period during which I have owned the Property.

Use of the Property

7. We use the Property as a domestic residence.
8. I have never seen anyone walking around the Property other than friends and family and scheduled contractors eg gas, electricity.
9. The building on the Property shown hatched black on the Plan was present and is used as our family home.
10. That part of the Property shown edged green on the Plan is grassed lawn, which we regularly maintain and keep trimmed, with ornamental trees and bushes around. We use this area as a garden. There are garden features such as flower beds, statuary, rockery, greenhouses and some small sheds as well as outdoor play equipment. Some fast-growing plants such as brambles and gorse have sprouted up in the last couple of years in the ornamental garden as our gardener had a back problem and is only now getting to all the jobs and the area immediately around the sewage plant on the east side is rough. The brick and stone steps marked on the Plan are exposed at the edge of the lawn on the west side. We understand that they were once part of a viewing point from the garden.
11. That part of the Property shown edged brown on the Plan is the wooded parkland. We also use this as a garden for walking and playing. There are some quite old feature trees and large ornamental rhododendrons dotted about as well as some garden features such as an old stone bench. There is a metal gate that we understand used to be an entrance driveway and many of the large trees that formed an avenue are still present. When we moved in we drove the car through the avenue as we were considering applying to re-open this driveway.
12. That part of the Property shown edged orange on the Plan comprises the access road, garaging and car parking.

13. We were informed about the issue with the common land designation on purchase as the previous owner had been taking steps to redress the error. However, nobody has ever told me that they had a 'right of common' over my land. Neither did anyone ever allege that they had an entitlement to graze their animals over my land. We briefly met the claimant Mrs Catherine Pike who still lived in the village when we moved in.

AND I MAKE THIS SOLEMN DECLARATION conscientiously believing the same to be true and by virtue of the provisions of the Statutory Declarations Act 1835.

DECLARED by the aforesaid CAROL COLLINS

at DMH Stallard LLP
Wonersh House, The Guildway
Old Portsmouth Road
Guildford, Surrey, GU3 1LR

this 25 day of NOVEMBER 2019

at DMH Stallard LLP
Wonersh House, The Guildway
Old Portsmouth Road
Guildford, Surrey, GU3 1LR

BEFORE ME

Signed 

Solicitor/~~Commissioner for Oaths~~

This is the Exhibit "CC1" to the Statutory Declaration of **CAROL COLLINS**

Signed

CAROL COLLINS

DMH Stallard LLP

At

Womersley House, The Guild

Old Portsmouth Road

On 25 NOVEMBER
2019

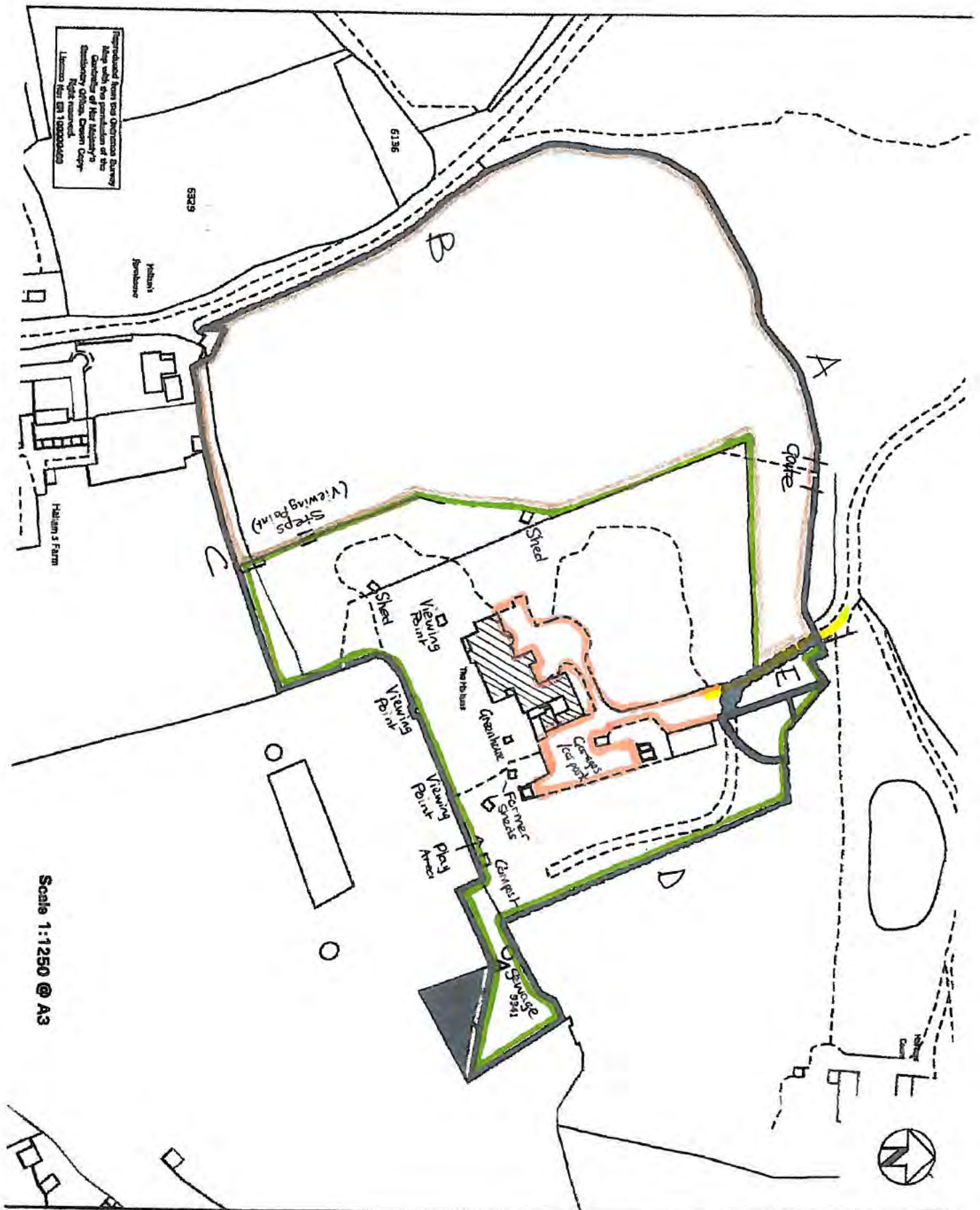
Guildford, Surrey. GU13 1L

Before me: CATHERYN CONVERHOUSE

Signed

~~Commissioner for Oaths~~/Solicitor empowered to administer Oaths

Tab 1



STATUTORY DECLARATION of

Richard TURNER

10

**I, Richard Turner, of The Hallams, GU4 8QZ DO SOLEMNLY AND
SINCERELY DECLARE AS FOLLOWS:**

1. I make this Statutory Declaration in support of the application by myself and Carol Collins to remove The Hallams from the Register of Common Land.
2. In this statutory declaration I will refer to the application site known as The Hallams, Littleford Lane, Blackheath, Guildford GU4 8QZ as "the Property". This is shown by the thick black outer line on the plan at Tab 1 of Exhibit "RPT1" (referred to in this Statutory Declaration as "the Plan").

The history of the Property

3. My first knowledge of the Property was via an estate agent in 2013 despite previously living at Lee Farm, Northcote Lane whose land in one part is within sight of the Property.
4. In 2013 I purchased the Property with Carol Collins. We are joint owners of the Property and have lived here initially with our young daughter, and were joined very soon after by our parents, making a total household of seven. That number rose to eight when we hired a permanent carer for Carol's parents and is now five following the deaths of Carol's parents. I have full knowledge of the Property from mid-2013 to the present time.

The boundaries of and buildings on the Property

6. On my second visit to the Property prior to purchase I was walked by the estate agent around the whole perimeter of the Property that was fenced or walled. The fencing was and is post and wire with some post and rail near the entrance gate. There were three "five bar gates" set into it at points I have marked. A path ran all along the boundary except for the far South East corner that juts out below the cess pit and sewage works to the site of a former spring used by the Property for water. This furthest corner was overgrown beyond the sewage works. The fully fenced or walled perimeter, is shown by the outer broad black line on the Plan
7. The formal gardens were in good upkeep and laid to lawn, flower beds and very mature specimen trees, chiefly oaks that I would estimate are hundreds of years old and had been preserved when the gardens were laid down in the 1890s. One reason for this belief of the age of the trees and that they had been preserved as specimens within the garden is a particular oak that had had the Southern

boundary wall built out around it on three sides suggesting it was of great size when the wall was constructed in 1894. Similarly, the wall was built out in the South West corner to accommodate a stand of four huge trees (two oak, one beech and one cherry). There was also laurel hedging that had grown to a great height to one side of the entrance drive and along the South West boundary of the formal garden behind the huge trees. The driveway was tarmacked and there were a number of areas of car parking with signage that I assumed dated from Bateman's occupation. The first car parking was on the left and marked for Visitors, then through a pair of wrought iron gates parking for Staff and finally at the front of the house the road surface changed from tarmac to ornamental blocks the length of the house at the front (North) and provided further considerable car parking. All of these features are still present today. I have marked the border of the formal gardens in red.

8. On the West side of the formal gardens there was a path running South North directly behind the row of oaks at the edge of the formal garden border. About half way along it widened into a driveway (grassed) that continued to run along the edge of the formal gardens ending in a "five-bar gate" onto the track across the Common. Soon after I arrived at the Property I considered hardening this driveway and using it as our main entrance c. 2014. I asked a contractor to the Property to consider the work, but he made me aware of planning permissions and we had other priorities such as converting the offices into residential accommodation for ourselves and our parents so I never pursued the venture, though for a period I used that gate and driveway to drive to and from the house. The drive is still used by our gardener for access to this part of the gardens and I often walked this way when I took the dog to the Common (prior to dog's back problem in 2017). The pathway section has shallow steps leading down to it from the West lawn about ten feet wide at the top and a similar distance long and done in the style of the house mixing brick and a particular local stone. At the end of the pathway on the South border there were and are a pair of gate posts, short walls and brick pillars and steps leading down to a possible viewing area looking out over the valley. Running away from the viewing area North there was and is a line of buried brickwork that I now believe is the foundations of railings that ran alongside the pathway from at least 1916 (shown by OS maps of that date and later). The railings were not present when we moved in, though two sections are stacked near the steps. I have marked the pathway and driveway in green on the Plan and annotated the steps.
9. At the North West corner of the house there is an area planted with very large ornamental rhododendrons and trees. The area appears to have two purposes – screening the West lawn from the view of callers to the house and hiding a shed from view from those looking out of the house through the huge bay window.
10. The garden had and has a series of garages, sheds and greenhouses. There was and is garaging for seven cars in five

separate buildings, not including the garage integral to the house on its East side that could house two or three further cars. There were three sheds of which two are still standing, whilst the third is now only marked by its concrete base that is used for a raised vegetable bed. There were three separate greenhouses of which two are still standing and in use and the third is only marked by its concrete base that is used for a raised vegetable bed. The garages and greenhouses are on the East side of the house along with the former shed and greenhouse. The other sheds sit on the West side. Finally, there are viewing areas surrounded by walls built in the same style as the South wall. One viewing area is adjacent to the South wall and looks over the valley to the South. The other is away from the South West corner of the house and sits mid-way along the West lawn. It is reputed to have overlooked a grass tennis court that sat on the top half of the West lawn prior to the Bateman's occupation. All structures are marked on the Plan.

11. The garden outside of the formal garden area sits on the West side and is laid over to woodland. The only feature I would call out is the electricity supply to the house that comes over ground on wooden poles through this garden running in a straight line from the North West as far as one can see to a pole I have marked on the map about twenty five metres outside of the formal gardens. At this pole the electricity supply drops from the overhead poles and is buried for about twenty five metres of the wider garden and all through the formal garden to the house. A further overhead line runs away from the pole South West to the gate house (now called Hallams Farm) and Hallams Farm and outbuildings (now split into multiple residential properties). I have drawn this pole and overhead lines in blue ink on the Plan. The line of the overhead lines is an indication of their direction. We have frequent electricity cuts; last year four and this year one. The electricity board park their mobile generator on the hard standing to the North West of the house and run a cable down to the pole in the woods thereby providing us and the properties at Hallams Farm with electricity. The generator is visited by their tankers every few days to top up its diesel. Electricity faults take anything from a couple days to over a month to repair.
12. We have always used the Property as our home and the home of our two sets of parents. All of us use all of the formal gardens. My parents live on the East side of the house and use all of the flowerbeds that existed on that side when we arrived and have dug additional flower beds and two raised vegetable beds on the concrete bases of one of the sheds and one of the greenhouses. My parents are in the gardens throughout the day and every day in the warm months. The gardens are their primary occupation in life and they continue to garden throughout the year, though they stop sitting outside in the cold months. Carol's parents lived on the West side of the house and walked around the formal gardens and the house every day for exercise both before and after they had a full time carer. They had a bench on the West side of the formal gardens where they often sat. My wife, daughter and I use all of the formal gardens for

leisure and entertaining with most memorably birthday parties for my daughter on the front lawn and our wedding reception on the South and West lawns. There have always been at least four sets of garden chairs and tables dotted around the lawns on the South and West lawns which are regularly used for leisure and meals in the warmer months. I have not marked them on the Plan as they have and are moved. My daughter has kept pet chickens on the South lawn for the last four or five years. Once again this is not marked as the coop is regularly moved to give them access to fresh grass. There are also swing ball posts, tyres and ropes hanging from trees and all of the other paraphernalia one would expect to find in a family garden. My daughter is a keen cricketer and in the Summer regularly plays/practices on the West lawn. With regard to the garden outside of the formal garden I regularly walked it with my dog Jack almost every day until about 2017 when at the age of 11 Jack damaged his back and was dragging his back legs. He has gradually recovered and can manage a fast walk, but is uncomfortable on slopes and so since 2017 we have not walked in the woods on the West side of the formal garden as they are too steep for him.

13. I have never seen anyone in the grounds of the Property who was not there by our invitation e.g. family, guests, contractors. On one occasion over the last seven years I have seen a dog chasing a deer across our gardens, but we did not see the owner and the dog and deer were out of sight within seconds.
14. Prior to purchasing the Property on a number of occasions we were given access to the Property by Carole Cooper. Carole lived in the caretakers flat with her husband for most of the time that Bateman's owned the Property. After it was sold to Mr Morel she continued to care for the property whilst not living there. I asked Carole prior to purchase if she had ever seen anyone walking in the grounds other than guests and staff. I'm reminded that she gave an identical answer to mine above. She assured me that had never seen anyone beyond an occasional lost dog in all of the years she lived at the house.

Knowledge of Common Land

14. The Common Land was mentioned in the estate agent's sale particulars. The estate agent also gave us a copy of a document that Catherine Pike signed in 2006 that confirmed that she had released her rights of common over the whole of the Hallams in 1978. Finally, we were shown, but not allowed to copy a document giving legal advice to Mr Morel from a QC, that appeared to say that the matter could be resolved once Surrey County Council brought into force the 2006 Commons Act.
15. I subsequently visited Surrey County Council and met with Helen Gilbert who was familiar with The Hallams and had previously met Mr

Morel. Helen helped me to find the details of Catherine Pike's 1968 registration and this made me aware that Catherine had drawn the line of her application in a haphazard way around The Hallams, scribbling out her original line and redrawing it excluding the printed name "The Hallams" and a building close to the name, that was actually the Hallams stable and coach house rather than the house. I also found that Catherine's line had captured a number of other properties all around the Common and each of these plots outside of the Common had been given separate and sequential numbers CL 431 to 436 and each and every one of them had been successfully dealt with, but over a period of decades. Helen explained that at the time of the Commons registration anyone could claim anything and home owners were not specifically contacted and made aware of these claims. Hence the unwinding of Catherine's work over many decades as home owners discovered Catherine's mistaken claim over their house and gardens and worked with her to rectify her mistake.

16. Finally, I talked to one or two people in Blackheath and was told that Catherine Pike was a lovely lady, that her mistake had split the village for many years, with some not forgiving her, and I was begged not to further upset her. I met with Catherine at a village event and she invited my family to tea. Over tea Catherine explained the matter had been dealt with in the 1970s and she thought we or Surrey County Council must be mistaken. She offered to provide any help she could, but believed we would find her declaration in the 1970s and her confirmation to Mr Morel had already rectified her mistake.

AND I MAKE THIS SOLEMN DECLARATION conscientiously believing the same to be true and by virtue of the provisions of the Statutory Declarations Act 1835.

DECLARED by the aforesaid Richard Turner



At DMH Stallard LLP
Wonersh House, The Guildway
Old Portsmouth Road
Guildford, Surrey, GU3 1LR

this 27 day of NOVEMBER 2019

BEFORE ME

CATHRYN CULVERHOUSE

Signed



Solicitor/Commissioner for Oaths

10 This is the Exhibit "RPT1" to the Statutory Declaration of Richard Turner

Signed ...

Richard Turner DMH Stallard LLP
At Womersley House, The Guildway
Old Portsmouth Road
Guildford, Surrey, GU3 1LR

On 27 NOVEMBER 2019

Before me: CATHRYN CULVERHOUSE

Signed

Commissioner for Oaths/Solicitor empowered to administer Oaths

