

# HUNTERS

SOLICITORS

9 NEW SQUARE  
LINCOLN'S INN  
LONDON  
WC2A 3QN

Our Reference AMAS.21822-3  
Your Reference PJ/RW/50/1(178)

TELEPHONE: 020 7412 0050

West Sussex County Council  
Rights of Way Officer  
County Secretary's Group  
DX 30330 CHICHESTER

**DIRECT FAX : 020 7404 1226**  
FAX : 020 7412 0049  
DX : 61 London/Chancery Lane  
E-MAIL : amas@hunters-solicitors.co.uk  
WEBSITE : www.hunters-solicitors.co.uk

25th February 2008

Dear Sirs,

**Declaration under the Highways Act 1980 - Section 31(6)**  
**Land in Grove Street, Petworth**  
**Our Client: Mrs Philippa de Pass**

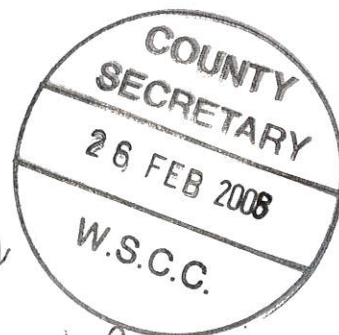
We thank you for your letter of 21st February under cover of which you returned to us the certified copy of the earlier Statutory Declaration dated 21st August 2002. We are therefore returning the earlier certified copy Statutory Declaration as no doubt this should be retained in your records.

Please would you return to us the original of the new Statutory Declaration dated 8th February 2008, retaining the certified copy of the at Declaration for your record purposes.

Yours faithfully,



Enc



*Original deposit  
returned with  
comp slip as requested*

*26/2/08*

JOE RICHARDSON  
ANDREW ALLEN  
PAUL ALMY  
JACQUELINE CLEMENTS  
MARTYN DILDORPH\*  
HETTY GLEAVE\*  
JONATHAN GODWIN-AUSTEN

HENRY HOOD\*  
RICHARD KERSHAW  
CAROLINE MACKENZIE  
EDWARD MARTINEAU  
ANDREW MELVIN  
GERALD MORAN  
MARTIN O'DONOGHUE

GRAHAM OGILVIE  
RICHARD O'HALLORAN  
JOHN OWEN  
PAMELA RICHARDS  
MICHAEL SKRINE  
PATRICIA SYKES  
LUCINDA TITE

**Consultants**  
JOHN KENNEDY  
NICOLAS ROBERTSON  
TIMOTHY SIMON  
MARK TOD

**Associates**  
LARA BARTON  
LOUISE ELLIS  
KATIE MARTIN

\* Also mediator

STATUTORY DECLARATION

SECTION 31(6) OF THE HIGHWAYS ACT 1980

I, **PHILIPPA DE PASS** DO SOLEMNLY AND SINCERELY DECLARE as follows :

1. I am and have been since 3<sup>rd</sup> February 1992 the owner of land in Grove Street, Petworth, West Sussex more particularly delineated on the map accompanying this declaration and thereon edged red.
2. On or about the 23<sup>rd</sup> day of August 1996 a statement accompanied by a plan delineating my property by red edging was deposited with West Sussex County Council, being the appropriate Council, which stated that no ways had been dedicated as highways over my property.
3. No additional ways have been dedicated over the land edged red on the map accompanying this Declaration since the statement dated 23<sup>rd</sup> August 1996 referred to in 2 above and at the present time I have no intention of dedicating any public rights of way over my property.

AND I MAKE this solemn declaration on the 21<sup>st</sup> day of August 2002 conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

Declared at Anderson Longmore & Higham  
Wisteria House, Market Square, West Sussex

Before me,

Carli Caroline Turbin  
Commissioner for Oaths/Solicitor

WE HEREBY CERTIFY THIS TO BE A TRUE  
COPY OF THE ORIGINAL DOCUMENT

*Carli*

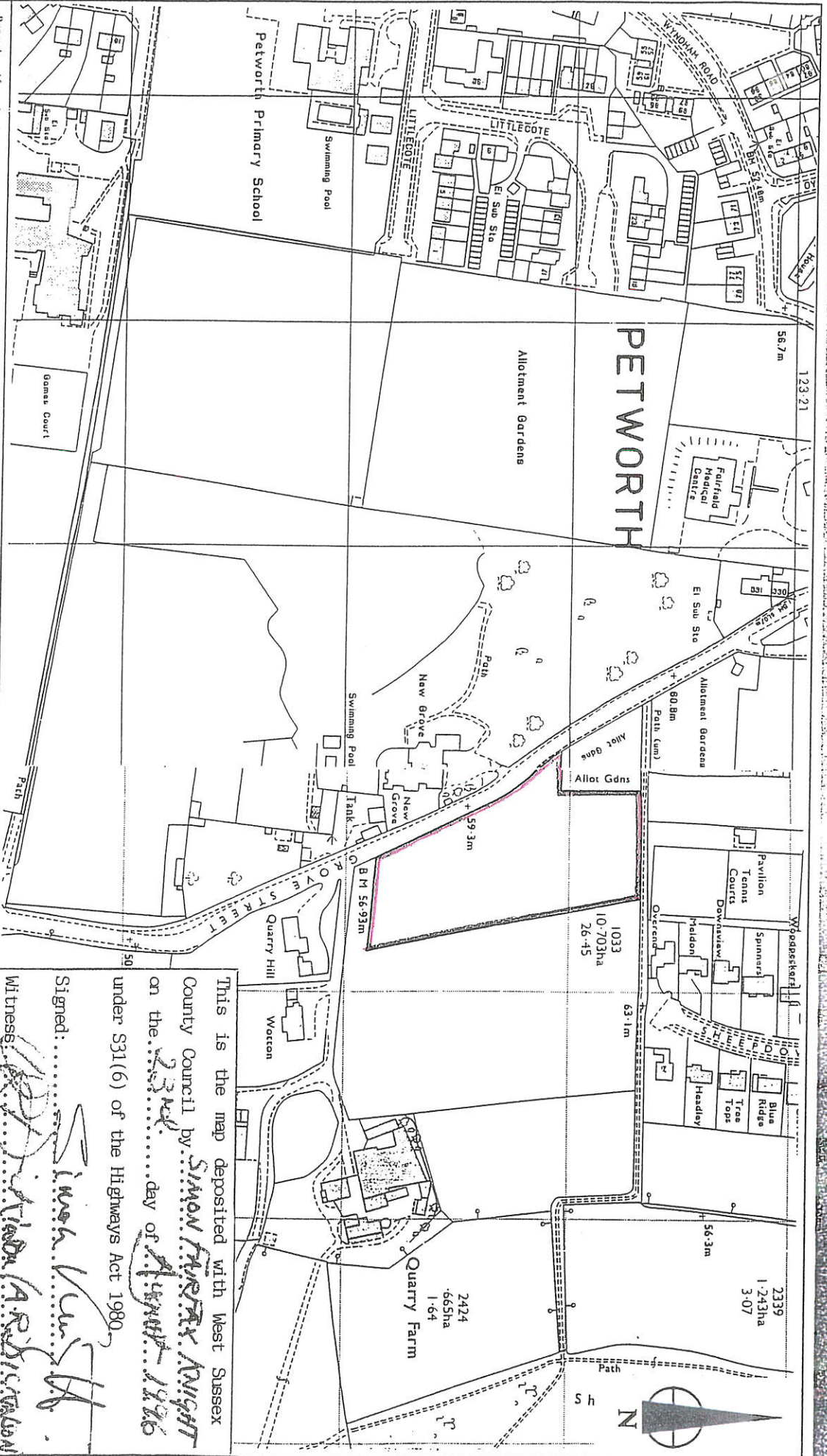
HUNTERS solicitors



# SMITHS GORE

chartered surveyors

# COPY



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sanction of the Controller of H.M. Stationery Office.  
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Smiths Gore Minister Precincts, Peterborough PE1 1XT  
Licence No. E5784834

Scale 1 : 2500

This plan is published for convenience  
only. Although it is thought to be correct  
its accuracy cannot be guaranteed.

MRS PHILIPPA DE PASS  
LAND IN GROVE STREET, PETWORTH

This is the map deposited with West Sussex  
County Council by *SIMON FORESTER KNIGHT*  
on the *23rd* day of *AUGUST 1986*  
under S31(6) of the Highways Act 1980

Signed: *Simon Forester Knight*  
Witness: *Philip de Pass*

**Peter Jupp**  
Rights of Way Officer  
Legal Services  
(01243) 756604 (Direct)  
(01243) 756874 (Fax)  
peter.jupp@westsussex.gov.uk  
www.westsussex.gov.uk

County Hall  
Chichester  
West Sussex  
PO19 1RQ  
DX 30330 Chichester  
(01243) 777100

---

Hunters  
Solicitors  
9 New Square  
Lincoln's Inn  
London  
WC2A 3QN

21 February 2008

Dear Sirs,

Our Ref: PJ/RW/50/1(178)  
Your Ref: AMAS.21822-3

**Land in Grove Street, Petworth  
Declaration under Section 31(6) of the Highways Act 1980.**

Thank you for the Statutory Declaration dated 8 February 2008 in respect of the above property.

I can confirm that the declaration has been placed on file with the original Statement and previous Declaration as requested. Can I remind you that the next renewal date will now be on or before 7 February 2018 (ie. 10 years from the date of this declaration as a result of amendments to S.31 of the Highways Act 1980 by Schedule 6 of Paragraph 3 of the Countryside and Rights of Way Act 2000).

Yours sincerely,



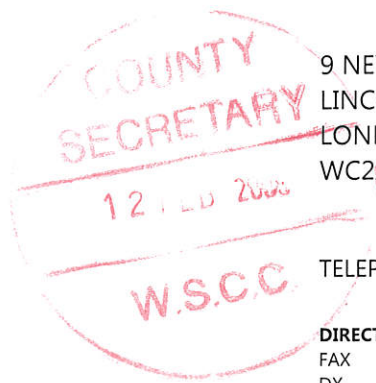
Peter Jupp  
Rights of Way Officer

# HUNTERS

SOLICITORS

Our Reference AMAS.21822-3  
Your Reference PAJ/P/RW/50/1&178

West Sussex County Council  
Rights of Way Officer  
County Secretary's Group  
DX 30330 CHICHESTER



9 NEW SQUARE  
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LONDON  
WC2A 3QN

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WEBSITE : [www.hunters-solicitors.co.uk](http://www.hunters-solicitors.co.uk)

11th February 2008

Dear Sirs,

**Declaration under the Highways Act 1980 - Section 31(6)**  
**Land in Grove Street, Petworth**  
**Our Client: Mrs Philippa de Pass**

---

We refer to your last letter of 4th September 2002, a copy of which is attached for reference purposes, and now enclose the original of a further Statutory Declaration made by Mrs Philippa de Pass on 8th February 2008 together with a certified copy.

Please would you arrange for the Declaration to be deposited with the Statutory Statement and plan lodged with the Council on 23rd August 2002.

We look forward to receiving the original Declaration back, as on previous occasions.

Yours faithfully,

Encs

JOE RICHARDSON  
ANDREW ALLEN  
PAUL ALMY  
JACQUELINE CLEMENTS  
MARTYN DALDORPH\*  
HETTY GLEAVE\*  
JONATHAN GODWIN-AUSTEN

HENRY HOOD\*  
RICHARD KERSHAW  
CAROLINE MACKENZIE  
EDWARD MARTINEAU  
ANDREW MELVIN  
GERALD MORAN  
MARTIN O'DONOGHUE

GRAHAM OGILVIE  
RICHARD O'HALLORAN  
JOHN OWEN  
PAMELA RICHARDS  
MICHAEL SKRINE  
PATRICIA SYKES  
LUCINDA TITE

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NICOLAS ROBERTSON  
TIMOTHY SIMON  
MARK TOD

**Associates**  
LARA BARTON  
LOUISE ELLIS  
KATIE MARTIN

\* Also mediator



Head of Legal Services  
Vivian McPhee

County Hall Chichester  
West Sussex PO19 1RQ

Telephone: (01243) 777196  
Fax: (01243) 777952  
e-mail:



If calling ask for

Our reference

Your reference

Mr. Peter Jupp

PAJ/P/RW/50/1  
& 178

4<sup>th</sup> September, 2002

Dear Sirs,

Declaration Under the Highways Act 1980 - Section 31(6)  
Land in Grove Street, Petworth

Thank you for your letter dated 23<sup>rd</sup> August, 2002, enclosing the Statutory Declaration signed on 21<sup>st</sup> August, 2002 by your Client.

I have deposited this declaration with the Statutory Statement and plan lodged with the County Council on 23<sup>rd</sup> August 2002. I would just mention that in order to be effective against any future claims, the Statement and plan will need to be renewed by another Statutory Declaration on or before 21<sup>st</sup> August, 2008.

I return a copy for your files as requested.

Yours faithfully,

Rights of Way Officer.

Messrs. Hunters.,  
Solicitors,  
9 New Square,  
Lincoln's Inn,  
London.  
WC2A 3QN



INVESTOR IN PEOPLE

Part of the  
County Secretary's Group  
County Secretary  
Mike Kendall

[www.westsussex.gov.uk](http://www.westsussex.gov.uk)



STATUTORY DECLARATION

SECTION 31(6) OF THE HIGHWAYS ACT 1980

I, **PHILIPPA DE PASS** DO SOLEMNLY AND SINCERELY DECLARE as follows :

1. I am and have been since 3rd February 1992 the owner of land in Grove Street, Petworth, West Sussex more particularly delineated on the map accompanying this declaration and thereon edged red.
2. On or about the 23rd day of August 1996 a statement accompanied by a plan delineating my property by red edging was deposited with West Sussex County Council, being the appropriate Council, which stated that no ways had been dedicated as highways over my property.
3. No additional ways have been dedicated over the land edged red on the map accompanying this Declaration since the statement dated 23rd August 1996 referred to in 2 above and at the present time I have no intention of dedicating any public rights of way over my property.

AND I MAKE this solemn declaration on the 8th day of February 2008 conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

*Philippa de Pass*

Declared at

*Market Square  
Petworth West Sussex*

Before me,

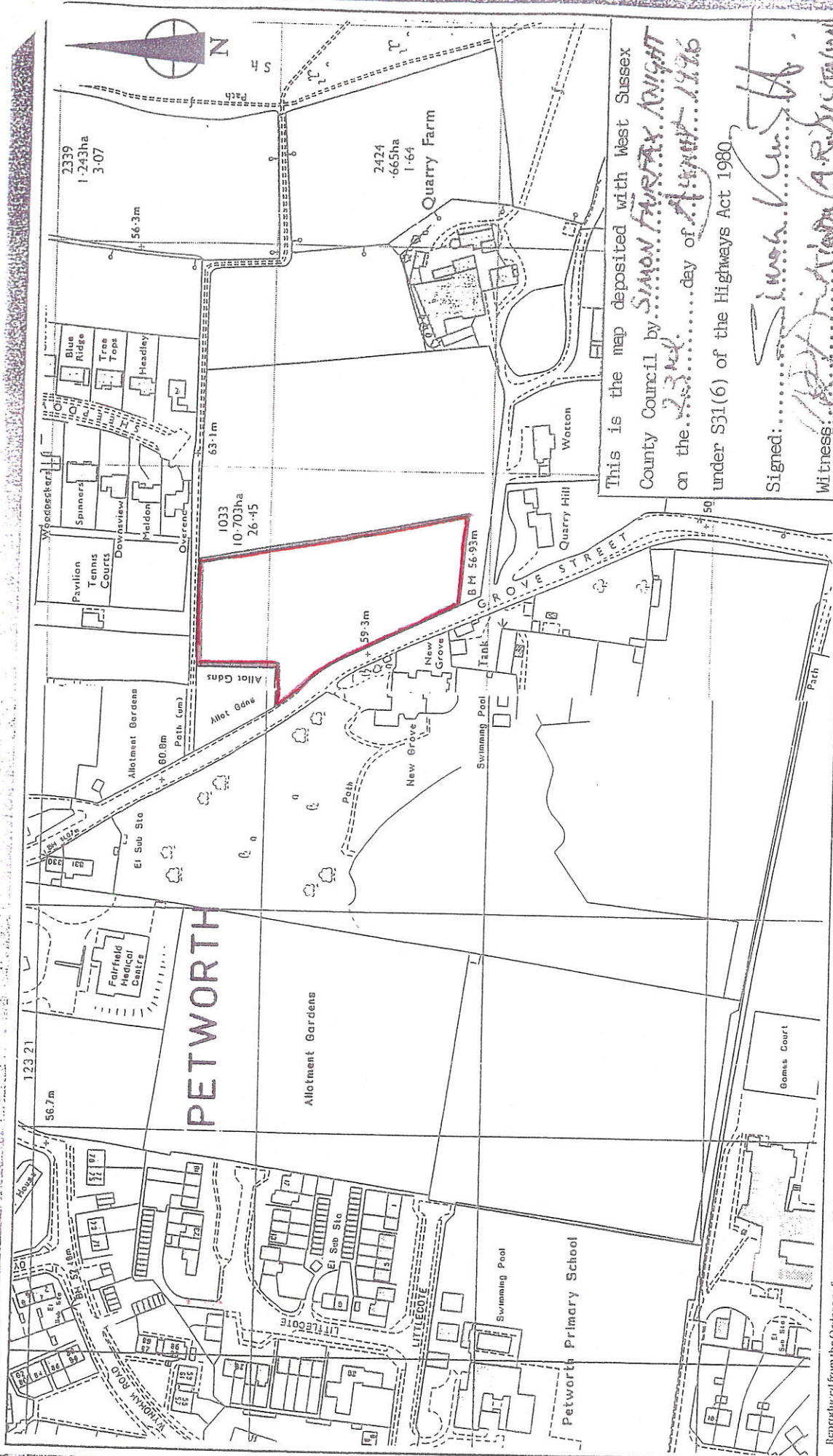
*A.P. Higham*  
Commissioner for Oaths/Solicitor  
*A.P. Higham*

WE HEREBY CERTIFY THIS TO BE A TRUE  
COPY OF THE ORIGINAL DOCUMENT

*Hunters*  
HUNTERS Solicitors

ANDERSON LONGMORE & HIGHAM  
SOLICITORS  
PETWORTH, WEST SUSSEX  
GU28 0AJ





This is the map deposited with West Sussex County Council by SIMON FARFAX KNIGHT on the 23rd day of August 1996 under S31(6) of the Highways Act 1980.

Signed: Simon Farnax Knight  
 Witness: Philip De Pass (A.R.B.S. 100000)

This plan is published for convenience only. Although it is thought to be correct its accuracy cannot be guaranteed.

Scale 1 : 2500

MRS PHILIPPA DE PASS  
 LAND IN GROVE STREET, PETWORTH



# HUNTERS (incorporating ALEXANDERS)

SOLICITORS

Our Reference ams.20424.1  
Your Reference PAJ/P/RW/50/1(178)

West Sussex County Council  
County Hall  
Chichester  
West Sussex PO19 1RQ

9 NEW SQUARE  
LINCOLN'S INN  
LONDON  
WC2A 3QN

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FAX : 020 7412 0049  
DX : 61 London/Chancery Lane  
E-MAIL : ams@hunters-solicitors.co.uk  
WEBSITE : www.hunters-solicitors.co.uk

5 September 2002

Dear Sirs,

**Highways Act 1980 - Section 31**  
**Land in Grove Street, Petworth, West Sussex**

We thank you for your letter of 4<sup>th</sup> September with enclosures and would thank you for your comments in paragraph 2.

Yours faithfully,

Hunters

J M S KENNEDY  
A M A SKRINE  
M N TOD  
M J DALDORPH\*

R D O'HALLORAN  
G D OGILVIE  
P A ALMY  
P A SYKES

H L A HOOD  
J R GODWIN-AUSTEN  
J M CLEMENTS  
H K M HARPER

L J TITE  
P B FENDRICH

Associates  
T H GLEAVE\*  
R C KERSHAW

\* also mediator

Consultants  
H A WOODESON\*  
R B NOWELL  
T D BISHOP

Head of Legal Services  
Vivian McPhee

County Hall Chichester  
West Sussex PO19 1RQ

Telephone: (01243) 777196  
Fax: (01243) 777952  
e-mail:

If calling ask for	Our reference	Your reference
Mr. Peter Jupp	PAJ/P/RW/50/1 & 178	4 <sup>th</sup> September, 2002

Dear Sirs,

Declaration Under the Highways Act 1980 - Section 31(6)  
Land in Grove Street, Petworth

Thank you for your letter dated 23<sup>rd</sup> August, 2002, enclosing the Statutory Declaration signed on 21<sup>st</sup> August, 2002 by your Client.

I have deposited this declaration with the Statutory Statement and plan lodged with the County Council on 23<sup>rd</sup> August 2002. I would just mention that in order to be effective against any future claims, the Statement and plan will need to be renewed by another Statutory Declaration on or before 21<sup>st</sup> August, 2008.

I return a copy for your files as requested.

Yours faithfully,



Rights of Way Officer.

Messrs. Hunters.,  
Solicitors,  
9 New Square,  
Lincoln's Inn,  
London.  
WC2A 3QN



Part of the  
County Secretary's Group  
County Secretary  
Mike Kendall

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No. 178. Deposited 23.8.96

# HUNTERS (incorporating ALEXANDERS)

SOLICITORS

Our Reference ams.20424.1  
Your Reference JK/P/RW/50/1(178)

West Sussex County Council  
County Hall  
Chichester  
West Sussex PO19 1RQ

9 NEW SQUARE  
LINCOLN'S INN  
LONDON  
WC2A 3QN

27 AUG 2002

TELEPHONE: 020 7412 0050

FAX : 020 7412 0049  
DX : 61 London/Chancery Lane  
E-MAIL : ams@hunters-solicitors.co.uk  
WEBSITE : www.hunters-solicitors.co.uk

23 August 2002

Dear Sirs,

**Highways Act 1980 - Section 31**  
**Land in Grove Street, Petworth, West Sussex**

We refer to our correspondence with you in November 1996, copies of which are attached for reference purposes, and now enclose the original and two certified copies of a further statutory declaration made by Mrs de Pass on 21<sup>st</sup> August 2002. The copies are for you to retain. Please would you return the original to us for placing with Mrs de Pass's title deeds.

Yours faithfully,



J M S KENNEDY  
A M A SKRINE  
M N TOD  
M J DALDORPH\*

R D O'HALLORAN  
G D OGILVIE  
P A ALMY  
P A SYKES

H L A HOOD  
J R GODWIN-AUSTEN  
J M CLEMENTS  
H K M HARPER

L J TITE  
P B FENDRICH

Associates  
T H GLEAVE\*  
R C KERSHAW

\* also mediator

Consultants  
H A WOODSON\*  
R B NOWELL  
T D BISHOP



County Secretary  
E M Holdsworth MA LMRTPI  
Solicitor

County Hall  
Chichester  
West Sussex  
PO19 1RQ  
Telephone  
(01243) 777 196

**west  
sussex  
county  
council**

li calling ask for	My reference	Your reference	
Mrs. Kingman	JK/P/RW/50/1(178)	6/10280/11877	11th November, 1996

Dear Sirs,

Highways Act, 1980 - Section 31  
Land in Grove Street, Petworth, West Sussex

Thank you for your letter and enclosures dated 5th November, 1996 on behalf of your client Mrs. Philippa de Pas.

It is not necessary for a statutory declaration until the deposition is renewed on a six yearly basis after it is first deposited. However, I have retained a copy of Mrs. P. de Pas' statutory declaration for our files. I am returning the other two copies to you.

Yours faithfully,

*J Kingman*

County Secretary

Hunters,  
Solicitors,  
DX 61,  
LONDON/CHANCERY LANE.

CS/CS.04

6/10280/11877

JK/P/RW/50/1(178)

5th November 1996

Dear Sirs,

**Mrs.Philippa de Pass**  
**Highways Act 1980 - Section 31**  
**Land in Grove Street, Petworth, West Sussex**

We refer to your recent correspondence with Mr.Dickinson of Smiths Gore concerning the above and in particular to your letter dated 3rd September 1996 to Mr.Dickinson. Further to that correspondence, we are now enclosing the original of a Statutory Declaration dated 1st November 1996 made by Mrs.de Pass together with two further certified copies. We are not certain whether it your practice to retain the original of the Statutory Declaration but if not, please would you return it to us as soon as possible. In the meantime, we are placing a further certified copy of the Declaration with Mrs.de Pass's title deeds.

Please would you in any event acknowledge safe receipt of this letter and the enclosures.

Yours faithfully,

For the attention of Mrs.J.M.Kingman

West Sussex County Council,  
County Hall,  
Chichester,  
WEST SUSSEX PO19 1RQ

**STATUTORY DECLARATION**

**SECTION 31(6) OF THE HIGHWAYS ACT 1980**

I, **PHILIPPA DE PASS** DO SOLEMNLY AND SINCERELY DECLARE as follows :

1. I am and have been since 3<sup>rd</sup> February 1992 the owner of land in Grove Street, Petworth, West Sussex more particularly delineated on the map accompanying this declaration and thereon edged red.
2. On or about the 23<sup>rd</sup> day of August 1996 a statement accompanied by a plan delineating my property by red edging was deposited with West Sussex County Council, being the appropriate Council, which stated that no ways had been dedicated as highways over my property.
3. No additional ways have been dedicated over the land edged red on the map accompanying this Declaration since the statement dated 23<sup>rd</sup> August 1996 referred to in 2 above and at the present time I have no intention of dedicating any public rights of way over my property.

AND I MAKE this solemn declaration on the 21<sup>st</sup> day of August 2002 conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

Declared at Anderson Longmoor & Higham  
Wisteria House, Market Square, West Sussex

Before me,

Caroline Turbin  
Commissioner for Oaths/Solicitor

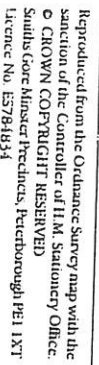
WE HEREBY CERTIFY THIS TO BE A TRUE  
COPY OF THE ORIGINAL DOCUMENT

HUNTERS solicitors



chattered snatches

COPY



Scale 1 : 2500

This plan is published for convenience only. Although it is thought to be correct its accuracy cannot be guaranteed.

MRS PHILIPPA DE PASS  
LAND IN GROVE STREET, PETWORTH

This is the map deposited with West Sussex County Council by SIMON FURLEY KNIGHT on the 23rd day of August 1986 under S31(6) of the Highways Act 1980.

Signed:

Witness

Simha Verma (A.R.D.)

Name of Owner: Mrs Philippa de Pass  
Address of Property: New Grove  
Grove Street  
PETWORTH  
West Sussex GU28 0BD

Date: 23rd August 1996

Reference: PC/145

STATEMENT OF LANDOWNER AS TO ADMITTED HIGHWAYS UNDER THE HIGHWAYS ACT 1980 SECTION 31(6)

TO: County Secretary  
West Sussex County Council  
County Hall  
Chichester  
West Sussex PO19 1RQ

Location of land: Grove Street, Petworth, West Sussex

1. I Philippa de Pass am the freehold owner and occupier of the above-mentioned land which is shown edged red on the attached plan hereby deposited with the County Council of West Sussex.
2. I deny that any ways have been dedicated as public highways over the land shown edged red on the said plan.
3. Furthermore, I deny that any person has any right of access onto any part of the land for any purpose whatsoever without my express permission.

Dated the 23rd day of August 1996

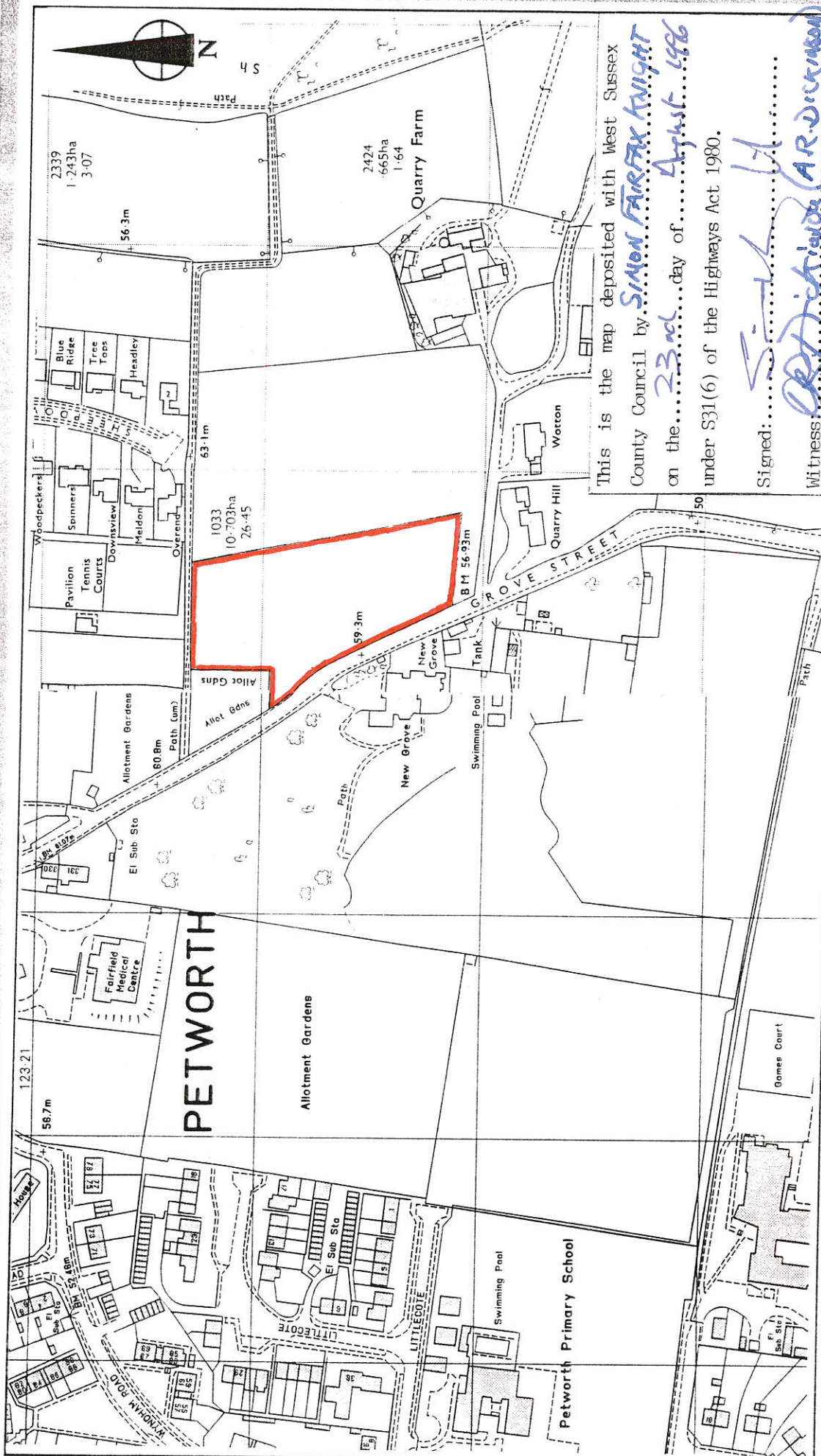
SIGNED BY: Simon Knight  
SIMON FAIRFAX KNIGHT a member of the firm of Smiths Gore, The Estate Office, Petworth, West Sussex GU28 0DU, as Agents for and on behalf of the Owner.

SIGNATURE OF WITNESS: A.R. Dickinson (A.R. Dickinson)

ADDRESS: Riverhill Farmhouse, Riverhill,  
Fittleworth, RH20 1JY.

OCCUPATION: Lead Agent.





This is the map deposited with West Sussex County Council by *SIMON FARFAX KNIGHT* on the *23rd* day of *August 1986* under S31(6) of the Highways Act 1980.

Signed: *S. Farfax*  
 Witness: *AR. Dickinson (AR. Dickinson)*

This plan is published for convenience only. Although it is thought to be correct its accuracy cannot be guaranteed.

Scale 1 : 2500

MRS PHILIPPA DE PASS  
 LAND IN GROVE STREET, PETWORTH



S F Knight FRICS  
D S Gray FRICS  
G N Mainwaring FRICS  
E A Fleming-Smith FRICS  
R W Ireland FRICS  
J B L Hoskyns-Abraham FRICS  
S A Stodart FRICS  
P A Scrope FRICS  
R M Clerk OBE FRICS  
P R Hutton FRICS  
H R A I Milton FRICS  
A C R Brown FRICS  
J J Dickinson FRICS  
P S Coles FRICS  
J P J Speller FRICS  
J MacLachlan FRICS  
R H Gladstone FRICS  
T P Metcalfe FRICS  
A D Neal FRICS  
R A de W Weldon FRICS  
G J Abbott FRICS  
B A F Swayne FRICS  
M W Orde FRICS  
A R Harle FRICS  
D A Gray FRICS  
R W J P Clark ARICS  
P B Everett FRICS  
J Dennis ARICS

*Associates*  
M Andrews ARICS  
T R Bennett ARICS  
J G Blake FRICS  
N J Davis FRICS  
S C W Derby ARICS  
A C Dickson ARICS  
J W T Durant FRICS  
J B Farquhar FRICS  
T C Florey FRICS  
N T H Flynn ARICS  
A M Fogden ARICS  
M J Gleeson FRICS  
C A H Gow FRICS  
T M Hargraves FRICS  
M J Harker FRICS  
A M Hutton MRTPI  
M G Metcalfe FRICS  
H M A Nicholson FRICS  
D W Nicol FRICS  
C R Orr-Ewing ARICS  
P W Scarborough FRICS  
J A Stiff ARICS  
R W Thompson ARICS

*Consultants*  
E J F Cameron FRICS  
D J Dunlop FRICS  
D L Laird FRICS  
Mrs M D Laverack OBE MSc  
J A W Leech FRICS  
H A R Long FRICS  
R A Windle FRICS

# SMITHS GORE

*chartered surveyors*

**Estate Office, Petworth,  
West Sussex GU28 0DU  
Telephone: 01798 342502  
Fax: 01798 343844  
DX: 49256 Petworth**

**Our Ref:** PC/145/ARD/LG  
**Your Ref:** JK/P/RW/50/1

23rd August 1996

The County Secretary  
West Sussex County Council  
County Hall  
CHICHESTER  
West Sussex PO19 1RQ

Dear Sir,

**Commander and Mrs R E F de Pass**

**Land in Grove Street, Petworth - Declaration under Section 31(6) of  
Highways Act 1980**

On behalf of our above-mentioned Clients, we are writing to acknowledge with thanks the receipt of your letter of 13th August, 1996, with its enclosures.

We have now prepared and enclose herewith a statement and a map for deposit with your Council. As indicated in the statement, you will note that the freehold owner of the land is, in fact, Mrs P de Pass.

We should explain that our Clients purchased the land, together with the adjoining property known as New Grove, from the Leconfield Estate in 1976. Until then, the land had formed part of a Leconfield Estate field included in a farm tenancy, that of Quarry Farm.

The use of the land was, of course, agricultural and there was no question of the public having had access thereto. Indeed, Public Footpath No.663 anyway immediately adjoins the northern boundary. This runs West to East, from Grove Street to the Sheepdowns, along a well defined and well used route, over land remaining in Leconfield Estate ownership.

Following their purchase of the land, our Clients planted trees thereon and otherwise converted the land to an area of parkland. Once the parkland was established, from about 1980 our Clients have, on an informal basis, kindly permitted access on foot only to local inhabitants.

.../.. 2

-2-

The County Secretary

23rd August 1996

In depositing the enclosed statement and plan, our Clients are anxious to reassure the Petworth Parish Council that, for the time being at any rate, there is no intention to rescind the informal permission granted. Mrs de Pass is pleased for local inhabitants to continue enjoying walking in the parkland. This action has been taken simply to protect our Clients' interests in the longer term.

When notifying Petworth Parish Council of this deposit, we should be grateful, therefore, if you would also kindly send them a copy of this letter.

Yours faithfully,



for Smiths Gore