The Planning Inspectorate

Appeal Decision

Inquiry held on 14 September 2021
Site visit made on 14 September 2021

by Jessica Graham BA(Hons) PgDipL

an Inspector appointed by the Secretary of State

Decision date: 21/10/2021

Appeal Ref: APP/D0840/C/21/3268530
Land known as Higher Hawks Tor, Bodmin, Cornwall PL30 4BB

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
- The appeal is made by Mr David Barriball against an enforcement notice issued by Cornwall Council.
- The enforcement notice, numbered EN18/00633, was issued on 18 January 2021.
- The breach of planning control as alleged in the notice is without planning permission, the material change of use of:
  - the building known as Higher Hawks Tor (Building A on the attached plan) from a single dwellinghouse to a mixed use comprising a large scale (sui generis) Home in Multiple Occupation (HMO) and a self-contained flat;
  - Lower Hawks Tor (Building B on the attached plan) from a single dwellinghouse to three dwellinghouses;
  - the land for the stationing of residential caravans (and associated engineering operations to facilitate their stationing on the land)

  And the
  - change of use of an outbuilding (Building C on the attached plan) to form a single dwellinghouse.
- The requirements of the notice are to
  1. Cease the use of the building known as Higher Hawks Tor marked with an A on the Land outlined in red on the attached plan for use as a (Sui Generis) large scale HMO and separate self-contained flat.
  2. Revert the building known as Higher Hawks Tor marked with an A on the Land outlined in red on the attached plan to a single dwellinghouse by undoing the works that facilitated the material change of use.
  3. Remove any resultant materials arising from compliance with requirement (2) from the Land.
  4. Cease the use of the building known as Lower Hawks Tor marked with a B on the Land outlined in red on the attached plan for use as three separate self-contained dwellinghouses.
  5. Revert the building known as Lower Hawks Tor marked with a B on the Land outlined in red on the attached plan to a single dwellinghouse by undoing the works (internal and external) that facilitated the material change of use.
  6. Remove any resultant materials from compliance with requirement (5) from the Land.
  7. Cease the use of the building marked with a black arrow and C on the Land outlined in red on the attached plan for use as a single dwellinghouse.
  8. Revert the building marked with a black arrow and C on the Land outlined in red on the attached plan to its former condition as an outbuilding by undoing the works (internal and external) that facilitated the change of use.
  9. Remove any resultant materials arising from compliance with requirement (8) from the Land.

10. Cease the use of the caravans, in the approximate locations marked with a black X on the Land outlined in red on the attached plan, for residential occupation.
11. Remove all caravans from the Land outlined in red on the attached plan.
12. Remove all services attached to the caravans in the approximate locations marked with a black X from the Land (electricity cables, gas bottles, waste pipes, septic tanks) outlined in red on the attached plan.
13. Remove all domestic paraphernalia, outbuildings and works associated with the residential use of the caravans in the approximate locations marked with a black X from the Land outlined in red on the attached plan.
14. Restore the Land outlined in red on the attached plan, as a result of compliance with the requirements of (11), (12) and (13) above, to its former condition.

- The period for compliance with the requirements is:
  - for requirements (1), (4), (7) and (10): six months
  - for requirements (11), (12) and (13): nine months
  - for requirements (2), (3), (5), (6), (8), (9) and (14): twelve months.
- The appeal is proceeding on the grounds set out in section 174(2)(c),(d) and (g) of the Town and Country Planning Act 1990 as amended.

Summary Decision: The appeal is dismissed and the enforcement notice is upheld with corrections in the terms set out in the Formal Decision below.

Procedural matters

1. The Enforcement Notice that is the subject of this appeal is the second issued by the Council in respect of the alleged breaches of planning control at the appeal site. An earlier Enforcement Notice, issued on 20 August 2019 ("the 2019 Notice"), was subsequently withdrawn.

2. In support of an appeal against the 2019 Notice, a document ("the 2019 Grounds of Appeal") was prepared by legal advisers acting, at that time, for the Appellant. The Appellant submitted a copy of the 2019 Grounds of Appeal, alongside his Statement of Case, in the course of the current appeal. The Planning Inspectorate wrote to the Appellant on 22 July 2021 to query his reasons for doing so, but received no response. At the Inquiry, the Appellant stated that he wished the arguments set out in the 2019 Grounds of Appeal to be applied to the current appeal, so far as they were still relevant. It was agreed that the arguments made in respect of grounds (b) and (e) were not still relevant, since they related to the specific wording and service of the 2019 Notice. I invited the Council to address, in its evidence and submissions to the inquiry, the remaining arguments in respect of grounds (c) and (g) and have proceeded on the basis that the current appeal is brought on grounds (c), (d) and (g).

3. All evidence to the Inquiry was given under oath or affirmation.

4. An application for costs was made by the Council against Mr Barriball. That application is the subject of a separate Decision Letter of even date.

The wording of the notice

5. As discussed at the inquiry, I shall correct the description of the breach to make it clearer that all four of the matters described in the notice are alleged by the Council to be *material* changes of use. I shall also correct requirement (11), in accordance with requirements (10) and (12), to refer to the caravans identified on the plan. These are both minor changes of a technical nature, and I am satisfied that they can be made without prejudice to either party.

The appeal on ground (c)

6. The ground of appeal is that the matters alleged do not constitute a breach of planning control. In simple terms, a breach of planning control is where development requiring planning permission has been carried out, without obtaining the required planning permission. The statutory definition[1] of "development" has two strands. The first is operational development (that is, the carrying out of building, engineering, mining or other operations in, on, over or under any land); the second is the making of any material change in the use of any buildings or other land.

7. The 2019 Grounds of Appeal contended that such change of use of Buildings A, B and C (that is Higher Hawks Tor, Lower Hawks Tor, and the outbuilding) as has taken place is not material.

8. The land and buildings at Higher Hawks Tor, outlined in red on the plan attached to the enforcement notice, were purchased by the Appellant on 3 March 2015. The sales particulars prepared by the estate agent (Inquiry Document 4) described Building A as an "imposing family residence" and Building B as a "detached 3 bedroom bungalow… currently uninhabitable." In his evidence to the inquiry, the Appellant confirmed that Building A had been presented in immaculate condition, but disputed the description of Building B as uninhabitable, because by the time of his purchase its renovation was well underway. He explained that Building C was an office, which had been used in connection with the former operation of the kiln on the land. While Building A was originally erected as an agricultural worker's dwelling, the Appellant stated that any agricultural activity had ceased by the date of his purchase; indeed, the Council confirmed at the inquiry that the condition restricting its occupancy to agricultural workers was lifted in 2014.

9. As I saw at my site visit, a number of changes have subsequently been made to these buildings. Building A originally had four bedrooms and a bathroom on the top floor; an ensuite master bedroom, with two further bedrooms and a bathroom on the lowest floor; and the middle floor provided the shared family spaces (there was a sitting room, dining room, kitchen, utility room, bathroom and games room). While the Appellant continues to occupy the ensuite master bedroom, the other bedrooms are rented out to tenants. The dining room is also now used as a bedroom, and the Appellant and his tenants share the use of the kitchen on the middle floor. In addition, the former games room has been converted to a self-contained flat which has two bedrooms, a living room, a bathroom and a kitchen all for the own private use of its occupiers.

10. Building A, then, has gone from being a single (albeit large) family dwelling to a building which houses many separate households, including one which is entirely self-contained. It is now a House in Multiple Occupation, licensed for a maximum of 12 persons forming 10 separate households. While I appreciate that the occupiers of the bedrooms outside the self-contained flat share some communal facilities, the distinction between the use of the building by a single family and its use by a large number of separate households is a significant one. The latter is, for example, likely to result in a much higher number of comings and goings than the former, involving pedestrian and vehicular movements, with increased potential for noise and disturbance.

[1] S.55 of the Town and Country Planning 1990 Act

11. Building B has been sub-divided so that rather than forming a single three-bedroom dwelling, it is now a building housing three separate, self-contained dwellings. Again, the difference in character between the former use of this fairly small building as one single dwelling, and its current use by three independent households, is marked. The intensification of its residential use has resulted in the occupiers constructing external additions to the structure, to provide themselves with additional space.

12. Building C has been fitted out with the facilities necessary for day to day living, such that it now constitutes a dwellinghouse. This is a clear and material change from its former use as an office.

13. In my judgment, the character of the use of each of these three buildings has undergone a material change. There is no dispute that the siting on the land of caravans for residential occupation by individual households is also a material change of use, irrespective of whether that land forms part of the curtilage of Buildings A or B, or is part of the wider holding. Looking at the land and the buildings as a whole, it is clear that the creation of a significant number of residential units, for let on a commercial basis to off-site workers, has brought about a material change in the character of the use of a planning unit where residential provision was previously made only for the private benefit of those occupying or working on the associated land.

14. At the Inquiry, the Appellant set out his understanding that works to the interior of a building do not require planning permission. In my experience, that is a fairly common misconception. While it is true that works which affect only the interior of a building, or do not materially affect its external appearance, are excluded from the statutory definition of development[2] (and consequently from the requirement to obtain planning permission) it remains the case that any material change in the use of a building *does* amount to development, and so (except in certain specified circumstances) requires planning permission.[3]

15. The Appellant pointed out that representatives of the Council had visited and inspected his premises on several occasions, in connection with the HMO use of Building A, and ordered him to undertake various works in order to obtain the necessary HMO licence. At one such visit, in March 2018, a number of officers from the Planning Department had been present. The Appellant holds the very strong view that the Council had plenty of opportunity to tell him that he needed to obtain planning permission, but failed to do so.

16. I have some sympathy with the view that in cases such as this, where the (separate) systems of HMO licensing and planning control are both applicable, the relevant departments within the Council should take a joined-up approach. But be that as it may, it does not absolve the Appellant from the requirement, and the responsibility, to obtain the necessary planning permission for development carried out on his land.

17. In summary, I find that the matters alleged by the notice amount to material changes of use for which planning permission was required, but not obtained. The appeal on ground (c) therefore fails.

[2] S.55(2)(a) of the 1990 Act
[3] Ss.55(1) and 57 of the 1990 Act

The appeal on ground (d)

18. The ground of appeal is that, at the date when the notice was issued, it was too late to take enforcement action against the breach of planning control.

The relevant statutory provisions

19. The time limits for taking enforcement action are set out in s.171B of the 1990 Act. Where the breach of planning control consists in the change of use of any building to use as a single dwellinghouse, no enforcement action may be taken after the end of the period of four years beginning with the date of the breach. Where the breach consists of any other material change of use, no enforcement action may be taken after the end of the period of ten years beginning with the date of the breach. The definition of "building" includes "any part of a building", and while self-contained flats are "dwellinghouses" for the purposes of the 1990 Act, HMOs are not.

20. S.171B(4)(b) provides for the taking of "further" enforcement action in respect of any breach of planning control within four years of previous enforcement action (or purported action) in respect of the same breach. It may be deemed that a Council "purported" to take action where, for example, it issued a defective notice which had to be withdrawn: the Council then has four years in which to take further enforcement action, even though the normal time-limit for such action may by then have expired. The implication of this for the current case is that when assessing the time limits for taking enforcement action, the date to consider is not the date of the current notice but the date of the 2019 notice; that is, 20 August 2019.

Building A: Higher Hawk's Tor

21. The oral evidence the Appellant gave to the inquiry was that he purchased, and moved into, the appeal site in March 2015. He chose the en-suite bedroom on the lower floor of Building A for his own use. Initially, various friends would come and stay in the other bedrooms but by around early May 2015, he began renting these bedrooms out. There was a lot of interest from migrant workers, such that he had only needed to advertise for tenants once in 2015; after that, word spread and new occupiers kept coming. He explained that not much work had been needed on his part to make the rooms suitable for letting. Later on, in order to comply with requests from HMO licensing officers, he had spent a lot of money on works such as fitting fire doors. The games room on the middle floor was converted to a self-contained two-bedroom flat, and people began living in it, in mid-2016. Further alterations were later made at the insistence of the Council, such as the installation of a £5,000 fire alarm system.

22. The Council contends that the breach of planning control occurred in January 2019. This is the date the Appellant had earlier provided in response to the question "When were the works to convert the dwellinghouse known as Hawks Tor into a house of multiple occupation substantially completed?" asked by the Council's Planning Contravention Notices (PCNs). [4]

23. In my view, the focus of the PCNs on the date of commencement, and substantial completion, of "works" is not particularly helpful here because the breach attacked by the notice is a material change of use, not operational development. As Mr Cooper-Young fairly acknowledged at the inquiry, it is

[4] PCN reference EN18/00176, response dated 1 February 2019

possible for a material change of use to take place before any associated operational development has been completed. In this case, there is no other evidence to contradict the Appellant's claim that he was letting out rooms to paying tenants by May 2015. In my judgment, that is when the change of use to a HMO took place. This falls within the ten-year time limit available for taking enforcement action against such material changes of use.

24. As regards the creation of the self-contained flat within building A, there is a year's discrepancy between the dates given by the Appellant in his PCN response (June 2017) and his oral evidence (mid-2016). I accept the Appellant's evidence that this flat was converted and occupied within a month, and conclude that the material change of use to a single dwellinghouse had occurred by the end of that month. In the absence of any other relevant evidence at all, it remains unclear whether the month in question was June 2016 or June 2017. But which ever it was, it is clear that the material change of use took place after 20 August 2015, and so fell within the four-year time limit available for taking enforcement action.

25. In summary, I find that the evidence shows the change of use of Building A to a HMO took place in May 2015, and the change of use of part of this building to a self-contained flat took place by June 2016 or June 2017. It follows that the earliest date on which the material change of use of the building to a mixed use comprising a HMO and a self-contained flat (the breach alleged by the notice) can have taken place is June 2016. That also fell within the time limit for taking enforcement action.

Building B: the bungalow known as Lower Hawk's Tor

26. The PCNs issued by the Council queried when works to convert the bungalow to residential flats commenced, and when they were "substantially completed". The answer the Appellant gave to both questions was July 2015. In the letter he submitted in support of the current appeal, the Appellant stated that he had made no alterations to the outside of the house, only "essential interior alterations", and that it had been occupied since June 2015.

27. The Appellant's oral evidence to the inquiry was that he had made a deal with a guy to live in the bungalow (Building B) while doing it up. A week after his purchase of the appeal site, the Appellant bought a caravan and placed it on the land next to the bungalow, for this guy to live in during the early stages of the renovation work. He lived in the caravan for about two months, until the Appellant caught him growing cannabis, and kicked him out. This was in May-June 2015. No further work was carried out on the bungalow for a week or so, but then some of the Bulgarian migrant workers, who were at that time living in Building A, got to work on it. They built two walls, knocked through one end to make a front door, put in an additional shower and toilet, and blocked up some of the internal doors, to create three separate living units. They had finished the work, and moved in, by August 2015.

28. The Council has consistently maintained that the breach of planning control did not take place until well after that date. The evidence of Mr Cooper-Young was that he first visited the appeal site on 19 April 2016, and saw building works being carried out at the bungalow and the outbuilding (Building C). He spoke to the Appellant's "handyman" working on them, who advised that they would be bringing the bungalow back into use at some point in the future, and that the outbuilding was being made weatherproof. Mr Cooper-Young confirmed in his

oral evidence that at the time of his 2016 visit, the outbuilding was not habitable; there was no indication that the part-renovated bungalow was sub-divided; and no signs that any residents were living in either building.

29. Mr Cooper-Young said that at a subsequent site visit on 8 March 2018, the building works to Building B were still not completed, and referred to the photographs (provided in his proof of evidence) taken of the exterior of the building on that date. He also referred to Improvement Notices issued by the Council's Private Sector Housing Team in April 2018, regarding the lack of adequate insulation at the three dwellings created from the bungalow, and the identification of the bungalow as "long-term empty" by the Council's Empty Property Section in 2015.

30. It is important to bear in mind that in appeals such as this, the burden of proof rests with the Appellant. If there is no evidence to contradict the Appellant's version of events, or make it less than probable, and their evidence is sufficiently precise and unambiguous, it should be accepted.

31. In this case, the evidence provided by the Council in respect of Building B contradicts that provided by the Appellant.

32. I have no doubt that in giving his oral evidence to the inquiry, the Appellant was doing his best to provide accurate and truthful information as to the sequence of events at the appeal site. He came across as a fundamentally decent and honourable man. However, it was notable that he did not appear to have – and has not at any stage provided – any written record or notes to prompt or confirm his recollection of the dates and events at issue. In contrast, Mr Cooper-Young was able to refer to contemporaneous photographs, letters and notes to support his evidence. He came across as a diligent and compassionate professional, with a clear understanding of the complexities of his official remit.

33. I am not persuaded that the photographs taken in 2018 necessarily demonstrate that the breach of planning control could not have taken place by that time. Even if the roof and windows were not complete (which the Appellant disputes), it is possible that the subdivision had by then been effected, and the three new units occupied. Similarly, the Improvement Notices do not assist in establishing when, and how, the newly created units were either capable of being occupied or first occupied. Of far more relevance is Mr Cooper-Young's oral evidence, which withstood cross-examination, that at his inspection on 19 April 2016 the bungalow had not been sub-divided and was not occupied.

34. In my judgment, a critical consideration here is the lack of any supporting evidence, at all, to corroborate the Appellant's version of events. He has not, for example, provided any statutory declarations or letters from current or former tenants or occupiers; any copies of Tenancy Agreements, Licences or Rent Book entries; any photographs of the works undertaken, or contractor's invoices; any evidence of rental income received; or any utility bills, council tax statements, or other documents that might assist with establishing how and when the accommodation was occupied. In response to my questions at the Inquiry the Appellant confirmed that he does require his tenants to sign a written agreement, but did not explain why he had not provided any copies of such agreements.

35. Taking all of this into account, I conclude that the Appellant has not discharged the evidential burden of demonstrating that, on the balance of probabilities, the material change of use of Building B took place before 19 August 2015. On the basis of the evidence before me, I consider it more likely than not that it did not occur until some point after Mr Cooper-Young's April 2016 site visit. This means that it fell within the four-year period available to the Council for taking enforcement action.

Building C: the outbuilding that was formerly an office

36. The Appellant's oral evidence to the inquiry was that work on the residential conversion of the outbuilding began in August 2015, after the conversion of the bungalow was finished; it was ready for occupation, and occupied, by Christmas 2015. In contrast the Council's evidence, as set out above, is that the outbuilding was still being worked on, and was neither habitable nor inhabited, at Mr Cooper-Young's site visit on 19 April 2016.

37. It is not necessary for me to resolve this discrepancy, because the earliest that the material change of use of the building could have taken place is when it was first capable of being occupied as a dwelling. On the Appellant's own evidence, that was not until December 2015. This fell within the four-year time limit available for taking enforcement action.

The caravans

38. The Appellant's oral evidence to the Inquiry, which was not disputed by the Council, was that the first caravan placed on the land was the one he got in March 2015, for occupation by the person who was supposed to be renovating the bungalow. After that, he acquired more caravans in stages, to provide additional accommodation for more migrant workers. He explained that he knew he wouldn't get planning permission for the siting of the caravans, but was waiting to find out when and how a drainage scheme would be implemented to resolve the problem of water from the valley crossing the appeal site and flooding the railway line below.

39. The Appellant stated that the occupiers of the caravans helped him out on his land, but their full-time employment was elsewhere. After some trees on the appeal site were cut down at the request of the Railway Company, the Appellant realised that the caravans were very visible, and were spoiling the appearance of the valley. He has since got rid of most of them, even though this meant he had to find new homes for the occupiers during lockdown, and now only a few remain.

40. On the Appellant's own evidence, then, the material change of use of the land to the siting of caravans for independent residential use took place, at the earliest, in March 2015. This was within the ten-year time limit for taking enforcement action against such development.

Conclusion on ground (d)

41. I have found that for each of the breaches of planning control alleged by the notice, enforcement action was taken within the relevant statutory time period. It follows that the appeal on ground (d) must fail.

The appeal on ground (g)

42. The 2019 Grounds of Appeal argued that the four month compliance period provided by the 2019 Notice was insufficient for the occupiers of the premises to find alternative accommodation. The notice that is the subject of the current appeal provides a compliance period of six months for the residential use of the buildings and caravans to cease.

43. The Appellant did not provide any reasons to substantiate the 12 month compliance period requested in the 2019 Grounds of Appeal, or to explain why six months would not be a sufficient period of time for the current occupiers to look for alternative places to live. There is not, for example, any apparent requirement under the terms of any tenancy agreement to provide occupiers with more than six months' notice to leave their accommodation; the Appellant did not dispute the Council's contention, at the inquiry, that a two month notice period would be usual.

44. In response to my questions at the Inquiry, the Appellant confirmed that there are currently two children (aged 8 and 10) and a baby living in the accommodation at the appeal site. His evidence was that the children do not currently attend any local schools. The Appellant also stated that his tenants are migrant workers, who speak little if any English, and this makes it difficult for them to find places to live.

45. I appreciate that communication difficulties can hamper the search for accommodation, and that workers from another country are unlikely to have much of a support network in terms of family and friends who may be able to assist. However, the Appellant spoke of his tenants' "taskmaster" having visited him to discuss the accommodation and services he provided, so it may be that help could be found from that quarter. In any event, I have not been provided with any evidence to indicate that there is a shortage of suitable alternative accommodation in the area, or that six months would be too short a period in which to identify it. The Appellant gave evidence that he was able to re-home, within two months, all of the occupiers of such caravans as he has already removed from the land (per paragraph above).

46. When weighing all of these matters in the balance, a primary consideration is the best interests of the children who live at the appeal site. The evidence indicates that the requirement to cease living there within 6 months would not interrupt their education, or affect any existing access to healthcare or other services, and I consider their best interests to be aligned with those of their primary caregivers, who also currently live at the appeal site. I am satisfied that the six month compliance period is reasonable.

47. The notice specifies a nine month compliance period for the removal of the caravans (together with their attached services and all domestic paraphernalia), and twelve months for undoing the works which facilitated the unauthorised changes of use of Buildings A, B and C; removing the resultant materials; and for restoring the land where the caravans were stationed to its former condition. The Appellant accepted that the works involved would not be substantial, and advanced no argument as to why these compliance periods would not be sufficient. I am satisfied that they are reasonable.

48. For the reasons set out above, the appeal on ground (g) fails.

Conclusions

49. In circumstances where anyone stands to lose their home as the result of an appeal decision, as is the case here, there is likely to be a serious interference with their rights under Article 8 of the European Convention on Human Rights (ECHR) as enacted through the Human Rights Act 1998 (HRA). However, it does not necessarily follow that this would be a violation of their human rights.

50. I am also mindful that the nationality of the existing occupiers constitutes a "relevant protected characteristic" for the purposes of s.149(1)(b) and (c) of the Equality Act 2010. 27. I have therefore had due regard to the Public Sector Equality Duty (PSED) contained in that section of the Equality Act, which sets out the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it.

51. Subject to the corrections described at paragraph 5 above I am satisfied that the requirements of the notice are not excessive, and the amount of time given to comply with them is adequate. In terms of the HRA I find that the requirements of the notice are not a disproportionate remedy when balanced against the need to regulate land use through the operation of development control measures, which are recognised as an important function of Government; this objective could not, in the circumstances of the current case, be achieved in any way which would cause less interference with the rights of the existing occupiers. In terms of the PSED, I have taken into account the possibility that the occupiers may, as a consequence of their relevant protected characteristic, find it harder than others (who do not share that characteristic) to seek alternative accommodation and am satisfied that the provision of a six month compliance period adequately addresses that disadvantage.

52. Weighing all of the relevant considerations in the balance, I consider that upholding the notice is proportionate.

53. I conclude that the appeal should not succeed. I shall uphold the enforcement notice with corrections.

Formal Decision

54. It is directed that the enforcement notice is corrected by:

- at the fourth bullet point of paragraph 3, inserting the word "Material" immediately before the words "Change of use; and
- at requirement no. 11 within paragraph 5, deleting the words "all caravans" and replacing them with "the caravans in the approximate locations marked with a black X"

Subject to those corrections, the appeal is dismissed and the enforcement notice is upheld.

Jessica Graham

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Mr D Barriball appeared in person and represented himself.

FOR THE LOCAL PLANNING AUTHORITY:

Mr B Curnow	Solicitor for the Council
He called:	
Mr C Cooper-Young Assoc RTPI	Principal Development Officer (Enforcement and Appeals)

Mr J Holman MRICS MRTPI FAAV (Principal Planning Officer, Planning and Enterprise Service) also appeared for the Council, but was not called to give evidence.

DOCUMENTS SUBMITTED AT THE INQUIRY

1 Opening statement on behalf of the Council
2 Clearer Copy of the document (prepared by Stephens & Scown LLP) submitted by the Appellant in support of his Statement of Case
3 Current floorplans of Buildings A and B, provided by the Council
4 Copy of Stags' updated sales particulars for Building A, provided by the Council
5 Closing statement on behalf of the Council
6 Costs application from the Council