
Appeal Decision

Inquiry Held on 28, 29 and 30 September 2021

Site visit made on 30 September 2021

by D Boffin BSc (Hons) DipTP MRTPI Dip Bldg Cons (RICS) IHBC

an Inspector appointed by the Secretary of State

Decision date: 30 November 2021

Appeal Ref: APP/C1435/C/18/3218015

Land at Ironside, Flitterbrook Lane, Rushlake Green, Warbleton, East Sussex TN21 9QH

- 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 "1990 Act").
- The appeal is made by Mr Andy Long against an enforcement notice issued by Wealden District Council.
- The enforcement notice was issued on 12 November 2018.
- The breach of planning control as alleged in the notice is without planning permission, the erection of a building for use as a dwelling in the approximate position shown coloured green on the plan attached to the enforcement notice.
- The requirements of the notice are:
 - (i) Demolish, dismantle, break up and remove the Building from the Land including any base or foundations upon which the Building is sited.
 - (ii) Remove from the Land all domestic and residential furniture, fixtures and fittings, including all personal effects associated with the occupation of the Building.
 - (iii) Remove from the Land all materials, rubble, rubbish, debris, tools and equipment arising from compliance with the above requirements.
- The period for compliance with the requirements is six months after the notice takes effect.
- The appeal is proceeding on the grounds set out in section 174(2) (b), (d) and (f) of the 1990 Act.

Summary Decision: The appeal succeeds in part and the enforcement notice is upheld as corrected and varied in the terms set out below in the Formal Decision.

Procedural Matters

1. The Inquiry sat for 3 days and all oral evidence was affirmed at the Inquiry.
2. The appellant originally included a ground (c) appeal (that planning permission is not required for the matters alleged). However, the appellant sought to demonstrate that the alleged building is in fact a caravan. As such, the evidence is seeking to demonstrate that what is alleged in the notice has not occurred as a matter of fact, a ground (b) appeal. The case for the appellant was set out on this from the outset and the Council has been able to consider and respond to this evidence including within its oral evidence at the Inquiry. The appellant confirmed at the Inquiry that he wanted that part of his case to be dealt with under section 174(2)(b) of the 1990 Act. I will assess these arguments on that basis.

3. Most of the appellant's evidence in relation to the ground (d) appeal relates to the residential use of the land. Consequently, this part of the ground (d) appeal was withdrawn, at the Inquiry, after the Council confirmed that the alleged breach related to operational development only. The appellant also confirmed that the parts of his ground (f) appeal relating to the use of the original red line area were withdrawn. The ground (d) and (f) appeals relating to the hardstanding were retained by the appellant.
4. Since there is no ground (a) appeal, and hence no deemed planning application, I cannot consider matters of planning merit. My decision rests on the facts of the case, on relevant planning law and judicial authority.

The Notice

5. On an appeal any defect, error, or misdescription in an enforcement notice may be corrected using the powers available in section 176(1)(a) of the 1990 Act, or the terms may be varied, where the correction or variation will not cause injustice to the appellant or local planning authority.
6. At the Inquiry the Council confirmed that the alleged breach of planning control relates to the operational development of constructing the alleged building and not a material change of use of the land. Nevertheless, the red line shown on the plan attached to the enforcement notice encompasses a much larger area of land than that occupied by the alleged building. Even though, the Council disputed whether the alteration was necessary both parties agreed that the plan could be altered, so the red line only relates to the land occupied by the alleged building, without injustice to either party.
7. I consider that to ensure that there is clarity that the alleged breach relates to operational development that the red line should be corrected to that shown on the amended plan¹ submitted at the Inquiry. As such, I intend to delete the plan attached to the enforcement notice and replace it with the amended plan. I can carry out these corrections without injustice to the parties.

Applications for costs

8. At the Inquiry applications for costs were made by Mr Andy Long against the Council and by the Council against Mr Andy Long. These applications are the subject of separate decisions.

The ground (b) appeal

9. To succeed on ground (b) the appellant would be expected to show on the balance of probability that the erection of a building has not in fact occurred. The basis of the appellant's case is that the alleged building has been designed and constructed to ensure that it complies with the Caravan Sites and Control of Development Act 1960 (CSCDA 1960) and the Caravan Sites Act 1968 (CSA 1968) in respect of a twin-unit caravan and is therefore a caravan, not a building.
10. Pursuant to section 55 of the 1990 Act "development" means the carrying out of building, engineering, mining or other operations in, on, over or under land. "Building operations" includes operations normally undertaken by a person

¹ Drawing No: WD/DC/MISC/ENF/3800a

carrying on business as a builder. A “building” is defined within section 336(1) of the 1990 Act to include any structure or erection.

11. The term ‘caravan’ is defined in section 29(1) in the CSCDA 1960 as meaning *“any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer)...”*.² Sections 13(1)(a) and (b) of the CSA 1968 provide that a twin-unit caravan designed or adapted for human habitation *“is composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices; and is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer)...”*. The structure as whole must be transportable – but the legality of such transportation on the public highway is irrelevant.
12. These prerequisites are usually referred to as ‘*the construction test*’ and ‘*the mobility test*’. There is also a ‘*size test*’, but it is undisputed that the size test is met. There is also no dispute that it has been designed or adapted for human habitation.
13. For there to be a caravan or a building there would need to be a ‘*structure*’. Therefore, I shall utilise this word to describe the alleged building as it is a neutral term for both a building and a caravan.
14. The structure completed on the site is single storey with an attic level and a pitched roof. It is a timber framed structure with timber clad walls and Onduline roofing sheets covering the pitched roof. The structure has no windows and there is a door in the one short end and a covered area/porch is next to that end.

Construction test

15. In *Byrne v SSE & Arun DC* [1997] 74 P&CR 420 (*Byrne*) the judgment confirms that there is nothing in section 13 of CSA 68 to indicate that the separately constructed sections must be each identifiable as caravans. The judgment also states that *‘The requirement is that the structure should be composed of not more than two sections “separately constructed”. That means, in my judgment, that it was an essential part of the construction process in order to bring a structure which would not otherwise be a caravan, within the definition of that which is to be deemed a caravan, that there should be two sections separately constructed which are then designed to be assembled on a site by means of bolts, clamps or other devices. If the process of construction was not by the creation of two separately constructed sections then joined together, the terms of the paragraph are not satisfied.’*
16. In *Brightlingsea Haven Limited v Morris* [2009] 2 P&CR 11 (*Brightlingsea*) the judgment considered whether items such as roof ridges, guttering, flues and floor coverings are to be treated as separate sections for the purposes of the construction test. It states that *‘it is but common sense that there will be small pieces that are required to be added to the assembled sections to complete the structure as a home. They are not ‘sections’ and do not prevent the structure falling within the definition given by section 13.1. I consider that this covers items such as the roof ridges, guttering, flues and also the floors. By floors I do*

² It goes on to list exclusions which are not relevant in this appeal

not refer to the underlying floor structure which is constructed in the factory which sits on the chassis. I refer to the floor which is designed to lie on top of that and to bridge the join between the two halves, which is fitted in the factory, removed and refitted on site.'

17. Section 13(1) of the CSA 68 requires that the structure '*is composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices ...*'. The Council considers that the steel beams form a third section to the structure and that the 2 timber sections of the structure cannot be treated as being separately constructed due to their proximity to each other. I accept that section 13(1) does not specify where the two sections should be constructed/made and/or that they need to be moved/lifted together to be assembled. No case law was put to me that addresses specifically those matters.
18. The appellant has endeavoured to ensure that the construction and assembly of the structure would meet the definition within Section 13(1) of the CSA 68. This was the main reason for constructing the structure in the manner undertaken. I can see no other obvious practical reason why a timber framed structure with a pitched roof would be constructed in the manner described below. At the Inquiry Mr Sheppard conceded that his submitted reports, in support of the Council's case, contained assumptions based on some inaccurate information regarding the structure's method of construction. Nonetheless, the appellant confirmed in detail the method he used to construct it.
19. Two floor sections that have separate ring beams or frames were put together from timber that the appellant chain sawed to size. These ring beams/frames have joists within them and oriented strand board (OSB) panels covering most of the top and bottom surfaces of the floor sections. The OSB panels do not extend to the edges of the timber frame therefore there are gaps left around the edges of the floor sections.
20. Beneath these 2 floor sections are 3 longitudinal steel beams that have been formed from bolting shorter sections together. Two additional shorter sections were joined, by welding, to the 3 longitudinal sections to create a rectangular 'table' for the appellant to work from. The 2 timber floor sections were flipped over, using a crane, when the OSB panels had been fixed to, what would be, the bottom side of each floor section. The gap between the edges of the OSB panels and those of the frames (on the bottom of the flipped floor sections) correlates approximately to the position of the steel beams. The 2 timber floor sections were then positioned side by side with a very slight gap (a piece of paper wide) on top of the steel 'table'.
21. The wall sections also have timber frames with vertical and horizontal studs within the frames. The long wall and 2 short walls relating to the one floor section were constructed, lifted and fixed into place. Then the ceiling/attic floor support columns and beams followed by its ridge beam and rafters were put in place on that section. After that the other section's walls, ceiling/attic floor support columns and beams were constructed and put in place. The roof on the first section was then completed and then the process repeated on the second section.
22. The drawings submitted by the appellant of the structure were drawn by Mr Sasha Long, the appellant's brother, some considerable time after the completion of the structure. These appear to indicate that the 2 timber sections

of the structure were constructed some distance apart. However, the photographs³ submitted by the appellant in conjunction with the oral evidence, at the Inquiry, indicate that these 2 sections of the structure were side by side with the very slight gap remaining between them until the final assembly of bolting them together.

23. The internal parts of the sections were independently studded out and services inserted. The evidence before me indicates that the one section of the structure houses all the pipework, drainage and major electrical items. I observed on site that these services are to the one side of the structure and could be disconnected. The floor and wall sections were filled with insulation and the wall sections were covered with plasterboard. At that point the appellant states that the 2 timber sections of the structure that stood side by side were bolted together. The internal wall and floor finishes were applied, and parts of the bathroom fittings and the freestanding metal kitchen units were put in place after the bolting together. Later the covered area/porch was constructed next to the one short end of the structure. It has a metal frame; open sides and the base of the metal frame is connected to the steel beams that are below the structure.
24. In my view, taking into account *Brightlingsea*, to form a 'section' of the structure, for the purposes of the construction test the elements in consideration should form an integral part of that structure and not be small pieces added to complete the structure as a home. The internal wall and floor finishes are small pieces that cannot reasonably be treated as separate sections. The covered area/porch could be disconnected and removed from the structure relatively easily and without damaging the structure. As such, it reasonably cannot be treated as a separate section of the structure in relation to the construction test.
25. The steel 'table' was constructed by the appellant from universal columns he had previously obtained. The steel beams are not physically fixed to the timber floor sections. Static caravans, mobile homes and park homes (all of which are designed to fall within the definition of a caravan) have to sit on the ground in some way. If they sit flat on the ground there are issues with damp and with future mobility, so they usually are raised off the ground in various different ways such as on legs, pads or blocks.
26. However, in this case the steel beams provided a stable platform or 'table' which aided and supported the construction of the 2 timber sections of the structure above it. One short end of the steel 'table' has been removed and there is no dispute that the short ends of the 'table' are not required now to provide overall structural support. Nonetheless, the longitudinal beams provide elements of structural support.
27. In addition, the appellant's appeal statement⁴ indicates that at that point in time he considered that the method of construction allowed for either the 3 longitudinal beams themselves to be used for lifting or for other forms of cradling to be used. At the Inquiry there was no dispute that additional and/or replacement steel beams would be required to lift and move the structure as assembled.

³ Ref Nos C1-C6 within Core Document 3.

⁴ Point (f) on page 3 of A2 within Core Document 3

28. Nevertheless, taking into account all of the above, the steel beams can reasonably be considered to form an integral section/s of the structure. As such, in this case the structure is composed of more than 2 sections separately constructed.
29. In any case, even if I am wrong in this respect, it does not strictly follow that the 2 timber sections have been separately constructed. Even though, the one section was constructed up to its rafters before the other section's walls and other parts were constructed the appellant's personal statement⁵ states that '*to aid in the construction the long wall and two short wall end panels of Section 2 were constructed and erected*'. It is apparent that even though there was a very slight gap between the 2 timber sections and each section had corner bracing to ensure it was strengthened the construction of the one section in proximity to the other one assisted in the construction process of the other section and vice versa.
30. Moreover, the appellant's personal statement⁶ also states that once the second section had its Onduline roofing sheets on the '*twin unit caravan was now effectively water and weather tight*'. In my judgment, the minimal gap between them means that, even before they were bolted together, they effectively formed one whole structure. On a fact and degree basis, that supports the Council's position. Taking into account all of the above the construction test has, on the balance of probability, not been met in this case.

Mobility test

31. In *Carter v SSE* [1994] 1 WLR 1212 (*Carter*) the Court of Appeal clarified that, to be a caravan for the purpose of section 29(1) of the CSCDA, the assembled unit must be capable of being towed or transported as a whole by a single vehicle. The wording of section 13(1) of the CSA 1968 defines a twin unit caravan as one that is, "*when assembled*", physically capable of being moved by road from one place to another.
32. The structure is not on wheels and it could not be towed. However, it is whether the structure is physically capable of being transported on a motor vehicle or trailer once lifted which is the test. The test is not concerned with whether the structure was ever intended to be moved or the adequacy of the access or other roads leading to the site to accommodate transportation, as long as it is physically capable of being moved by road.
33. At the site visit the one short end of the structure was lifted a few centimetres off the ground utilising a metal beam, that was bolted to the longitudinal beams, straps and a crane. It is apparent that the appellant has extensive knowledge and experience of organising and facilitating the lifting and movement of large items such as bridges, railway components and mobile homes through running his recovery business.
34. The oral evidence at the Inquiry confirmed that the structure would need to be jacked up to allow several additional steel beams to be manoeuvred into place beneath it. These beams would be used as a lifting cradle and would replace the existing beams that are under the structure. The submitted lifting plans include 2 differing arrangements of steel cradles to lift the whole structure. Mr

⁵ Page 2 of 3 of A3 within Core Document 3

⁶ Page 2 of 3 of A3 within Core Document 3

Miller confirmed in his oral evidence that the 4-point lifting plan⁷ indicated that the 2 beams connected to the lifting strops would be above the existing longitudinal beams.

35. However, Mr Woods stated that in his calculations for a 4-point lifting plan those 2 beams would be beneath 3 additional beams that would replace the existing longitudinal beams, and in this respect, he indicated that he differed from Mr Miller. He went on to confirm that, he considered, that without the 3 additional beams the structure could not be lifted without structural damage.
36. Nevertheless, Mr Woods agreed that the 6-point lifting plan⁸ could be utilised to lift and carefully manoeuvre the structure onto a low loader vehicle in his opinion. Mr Sheppard did not dispute that the whole structure could be lifted and moved with a steel cradle to support it. Yet, the lifting plans do not include any details relating to the method of jacking up the structure to allow the additional beams to be moved into place. At the Inquiry Mr Miller stated that jacking up was a small part of the lifting process and he considered that it is routinely carried out. The appellant, as stated above, is experienced in facilitating the lifting and movement of large structures. Nonetheless, there is little specific evidence before me to indicate that the structure is physically capable of being jacked up without structural damage occurring to it.
37. Furthermore, the additional steel beams/cradle are clearly not part of the structure itself but would be utilised to distribute loads and provide structural support during lifting and moving. The need for the addition of the steel cradle suggests to me that the structure when assembled in its unmodified form is not, in fact, capable of being moved without significant risk of damage or collapse.
38. Overall, therefore, I conclude that it has not been demonstrated, on the balance of probabilities, that the structure is when assembled, physically capable of being moved as a whole without structural damage and the mobility test is not met.

Other matters

39. In this case the various materials were brought to the site, cut to size and put together to create the sections of the structure. The appellant with the aid of his family and friends constructed most of the structure. However, the type of works involved in the formation and erection of the sections of the structure can reasonably be treated as operations normally undertaken by a person carrying on business as a builder.
40. Consequently, there was an act of development which took place on the appeal site of building the two timber sections; anyone passing the site or looking at what was taking place on site would have concluded that the structure was being built on site, albeit in sections. Given the extent of works undertaken on site, I fail to see any significant difference to that which would have been involved in the construction of a conventional timber frame structure.
41. In *Cardiff Rating Authority v Guest Keen Baldwins Iron and Steel Co Ltd* [1949] 1KB 385, *Barvis v SSE* [1971] 22 P&CR 710 and endorsed by the Court of Appeal in *Skerritts of Nottingham Ltd v SSETR & Harrow LBC* (No. 2) [2000]

⁷ Ref No: PL2 in Appellant's Statement of Case

⁸ Ref No: PL1 in Appellant's Statement of Case

EWCA Civ 5569; [2000] JPL 1025 three primary factors were identified as decisive of what was a building – size; permanence; and physical attachment.

42. The structure was built/constructed on site. It is of a relatively significant size being around 12.3 metres in length and 6.2 metres in width. It has a living room, kitchen, closet/utility room, 2 bedrooms and 2 bathrooms. It has been lifted at one end but there is no evidence before me to indicate that it has moved position. It is mainly of wooden construction, as are many buildings. In my view it appears substantial and could be expected to stand for many years. Thus, it has a significant degree of permanence. As with any structure it may be removed if circumstances change, but that does not make it impermanent.
43. The structure is not physically attached to the ground, but it is held in place through its own weight. There is dispute between the parties regarding the actual weight of the structure. It rests on the steel beams which support it and hold it off the ground. The fact that caravans are also held in place by their weight alone does not mean that a structure must be anchored by some additional means for it to be a building. Additionally, there is nothing that makes me consider that the weight of such a sizable structure would not be considerable and that it would not achieve the necessary affixation to the ground through its inherent weight.
44. The structure was constructed utilising building operations and the nature and scale of those building operations were significant. Moreover, even though no one factor is decisive, due to its size, permanence and physical fixation, as a matter of fact and degree, a reasonable conclusion to reach would be that the structure, on the balance of probability, can be regarded as a building.

Conclusion – the ground (b) appeal

45. I therefore consider that the structure meets all of the tests for being a building but does not meet all of the tests for being a caravan. For the reasons given above I conclude, on the balance of probability, that the structure is a building and is not a caravan. Consequently, those matters as alleged have occurred. The ground (b) appeal fails.

The ground (d) appeal

46. The ground of appeal is that at the time the notice was issued it was too late to take enforcement action. The appellant does not contend that the operational development involved in the construction of the structure is immune from enforcement action. The appellant's case on ground (d) is limited to the hardstanding that is beneath the structure. Accordingly, there is no basis on which the notice could be quashed under ground (d), but there is scope for argument over whether the notice can require removal of the hardstanding. It is reasonable to consider that the hardstanding is the '*base or foundations*' as cited in requirement (i).
47. The hardstanding is in a different position to the hardstanding cited within the enforcement notice issued on 6 March 2000 and the appeal decision⁹ submitted within the evidence before me. As such, both parties confirmed that that enforcement notice is not relevant to this appeal.

⁹ APP/C1435/C/00/1040219

48. The parties agree that the hardstanding was formed prior to 12 November 2014. An area of hardstanding was refreshed with new material in 2012 and invoices for the material that was laid at that time have been submitted. However, the Council's case is that the refreshment of the hardstanding was an integral part of the operational development associated with the construction of the structure. The appellant conceded, during cross-examination, that his written evidence provided within his personal statement and photograph C7 do not totally correlate. He confirmed that the part of the site that was being worked on in that photograph was unlikely to be under the structure given the location of the steel container that is also shown in the photograph.
49. Nevertheless, there is no dispute that the photograph was taken at the time that the hardstanding was refreshed in 2012. Vehicles are shown parked on an area of hardstanding that is, more likely than not, now partly below the structure. Furthermore, the appellant stated affirmed there was previously a building on part of the appeal site that housed a pig.
50. The area of hardstanding is close to the storage container, the adjacent buildings and parts of the appellant's land used for his recovery business. The evidence before me indicates that there was likely to have been some form of hardstanding on or adjacent to the appeal site prior to it being refreshed with new material in 2012. In addition, the area of overall hardstanding was greater in area than required purely for the construction of the structure. Therefore, it is reasonable to consider that the refreshed hardstanding was intended for a purpose associated with the appellant's recovery business prior to the accumulation of materials associated with and the construction of the structure.
51. In conclusion, on the balance of probability, the hardstanding was substantially complete prior to 12 November 2014 and the hardstanding beneath the building existed on or before that date. The ground (d) appeal succeeds to that extent.

The ground (f) appeal

52. An appeal on ground (f) is made on the basis that the steps required by the notice to be taken, or the activities required by the notice to cease, exceed what is necessary to remedy any breach of planning control which may be constituted by those matters or, as the case may be, to remedy any injury to amenity which has been caused by any such breach.
53. The purpose of the notice (as corrected) is clearly to remedy the breach of planning control since the operational development referred to is to be removed in its entirety and the land is to be restored to its previous condition.
54. I have found in favour of the appellant in respect of the ground (d) appeal and I intend to vary requirement (i) by the deletion of the wording '*including any base or foundations upon which the Building is sited*'. The requirements, as varied, of the corrected notice are necessary and sufficient to remedy the breach by returning the land to its former condition prior the breach taking place. Given that the corrected and varied notice does no more than seek to achieve the purposes of section 173(4)(a) of the 1990 Act, it is not excessive. While the steps required are not excessive, the appeal on ground (f) succeeds as I am varying the steps required by the notice.

Other Matters

55. The appellant has referred to a number of appeal decisions¹⁰. Whilst text from an appeal decision is quoted within section CL2 of the appellant's appeal statement¹¹ no further details or even a copy of the full decision has been submitted. As such, I cannot be certain that the circumstances of that case are similar to the case before me.
56. The Inspectors in each of the 3 other cases were considering whether the Councils' decisions to refuse to grant certificates of lawful development for the proposals were well founded. These appeal decisions are fact sensitive, and I do not have the full details that were before those Inspectors. Whilst there is a need for consistency in the planning process, I am not bound to reach the same conclusions. As far as material to my decision, the principles applied by those Inspectors in each case has been applied to this appeal having regard to the evidence presented.

Overall Conclusion

57. For the reasons given above I conclude that the ground (b) appeal should not succeed but the ground (d) and (f) appeals succeed in respect of the hardstanding. I shall uphold the enforcement notice with corrections and variations.

Formal Decision

58. The appeal is allowed in part, on grounds (d) and (f), and it is directed that the enforcement notice be corrected by:

- Deleting the plan attached to the enforcement notice and substituting it with the amended plan appended to this decision.

and varied by:

- Deletion of the wording '*including any base or foundations upon which the Building is sited*' within requirement (i).

Subject to these corrections and variations the enforcement notice is upheld.

D. Boffin

INSPECTOR

¹⁰ CL2 in appeal statement – Brentnall 2002; APP/B1930/X/14/2216233; APP/L5810/X/15/3140569; APP/Q1255/X/16/3142534

¹¹ Core Document 3



Amended Plan

This is the plan referred to in my decision dated: 30 November 2021

by **D Boffin BSc (Hons) DipTP MRTPI Dip Bldg Cons (RICS) IHBC**

**Land at: Ironside, Flitterbrook Lane, Rushlake Green, Warbleton, East Sussex
TN21 9QH**

Reference: APP/C1435/C/18/3218015

Scale: Not to Scale



APPEARANCES

FOR THE APPELLANT:

Monica Adams-Acton

She called

Andy Long	Appellant
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John Miller	Plant Movements Ltd
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David Wood	Civil Engineer
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Sasha Long

Hugo Robbins

FOR THE LOCAL PLANNING AUTHORITY:

Saira Kabir Sheikh QC	Instructed by B Boakes, Legal Officer
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She called

Richard Sheppard	Structural Engineer
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Craig Moon	Enforcement Officer
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DOCUMENTS

8. Photograph of base of structure
9. Amended Plan
10. Page of appellant's proof of evidence
11. Package of information relating to The Lifting Operations and Lifting Equipment Regulations 1998
12. Appeal Decision – APP/B1930/X/14/2216233
13. Appeal Decision – APP/L5810/X/15/3140569
14. Appeal Decision – APP/Q1255/X/16/3142534
15. Outline Costs Application on behalf of the Council
16. Costs Application of behalf of appellant
17. *Brightlingsea Haven Limited v Morris* [2009] 2 P&CR 11
18. *Byrne v SSE & Arun DC* [1997] 74 P&CR 420
19. *Carter v SSE* [1994] 1 WLR 1212
20. Closing Submissions on behalf of the Council
21. Closing Statement of Appellant

(numbering follows on from documents in the Core Document List)