



Appeal Decisions

Inquiry Held on 31 January 2023 to 2 February 2023

Site visit made on 1 February 2023

by Roy Curnow MA BSc(Hons) CMS MRTPI

An Inspector appointed by the Secretary of State

Decision date: 15 May 2023

Appeal A Ref: APP/D1265/C/21/3288800

Land south of Rhode Barton Farm, adjacent to A3052 Charmouth Road, Lyme Regis DT7 3UE

- 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 Andrew Day against an enforcement notice issued by Dorset Council ('the Notice').
 - The enforcement notice, numbered WD/ENF/20/00058, was issued on 26 October 2021.
 - The breach of planning control as alleged in the notice is The unauthorised change of use of the land from agriculture to a mixed use for agriculture and residential by the stationing of mobile homes thereon for residential use (for the avoidance of doubt the mobile homes are identified in photographs attached to this notice).
 - The requirements of the notice are: i. Cease the use of the land for residential purposes; 1. Permanently remove from the land the mobile homes; and 2. Permanently remove from the land any hardstanding, utility pipes, any portalooes and other paraphernalia used in association with the residential use of the land.
 - The period for compliance with the requirements is 6 months.
 - The appeal is proceeding on the grounds set out in section 174(2)(d) (f) and (g) of the Town and Country Planning Act 1990 as amended ('the Act').
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Appeal B Ref: APP/D1265/X/22/3308039

Land south of Rhode Barton Farm, Land Registry Title Number DT205227, adjacent to A3052 Charmouth Road, Lyme Regis DT7 3UE

- The appeal is made under section 195 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991 against a refusal to grant a certificate of lawful use or development (LDC).
 - The appeal is made by Mr Andrew Day against the decision of Dorset Council.
 - The application Ref P/CLE/2022/00634, dated 31 January 2022, was refused by notice dated 4 April 2022.
 - The application was made under section 191(1)(a) of the Town and Country Planning Act 1990 as amended.
 - The use for which a certificate of lawful use or development is sought is From agricultural to a mixed agricultural and residential use.
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Decision

1. In respect of Appeal A.

It is directed that the enforcement notice is varied by:

Adding the words "other than for purposes ancillary to the agricultural use of the land" after the words "...residential purposes" in requirement i. of section 5

of the Notice, 'What you are required to do';

Adding the words "which are used for any residential purpose other than ancillary to the agricultural use of the land" after the words "...the mobile homes" in requirement 1. of section 5 of the Notice, 'What you are required to do';

The deletion of requirement 2. of section 5 of the Notice, 'What you are required to do'; and

The deletion of "6 months" and the substitution of "12 months" as the period for compliance.

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

2. In respect of Appeal B: The appeal is dismissed.

Procedural Matters

3. The subject matter of the two appeals is the same and the issues raised are similar. As such, the two appeals were heard simultaneously. Therefore, they can be the subject of a single decision letter, though the reasoning for each decision is set out separately, where necessary.
4. In his written submissions, the Appellant made the case regarding a lack of clarity, imprecision and ambiguity in the Notice and its attached plan and that it was, therefore, defective. I was told that this case was not to be pursued in the Inquiry.
5. A paginated compendium of the appeal documents was produced by the Appellant, which was, in the main, relied upon when evidence was given. One document was found to be missing from this, the application form for an Agricultural Prior Notification application. A separate copy was circulated at the Inquiry. Where I make reference to documents from the compendium in this decision letter, the relevant page number– a letter followed by a number – is given, eg ['D12'].
6. The plan on which the Council based its decision in Appeal B was clearly incorrect, for example, it included part of the A3052. A replacement plan was agreed between the parties, and formally submitted by the Council at the Inquiry. As I am dismissing the appeal, I need not attach it to my decision.
7. All oral evidence was given under Oath. Proofs of evidence (PoE) were produced by the Council's witnesses, whilst the Appellant and his witnesses provided statutory declarations and a letter, which they spoke to.
8. I undertook a site visit on the second day of the Inquiry, accompanied by representatives of both parties. The Inquiry was kept open during this visit.

Reasons

Appeal A Ground (d) and Appeal B

9. An appeal made under Ground (d) is that, at the date the Notice was issued, no enforcement action could be taken in respect of the breach of planning control alleged in it. The time limit after which enforcement action can no longer be taken in respect of a material change of use ('mco') is set out in s171B(3) of the Act. It is 10 years from the date that the use commenced ('the relevant period'). Therefore, given the date the Notice was issued in Appeal A was 26 October 2021, the relevant period begins on 26 October 2011 ('the relevant date').

10. The application for the certificate of lawfulness, made under s191(a) of the Act, sought to ascertain whether the use of land was lawful. Here, again, the time limit in s171B(3) applies. As the application was dated 31 January 2022, the relevant date in this appeal is 31 January 2012.
11. In both the Ground (d) and s195 appeals, the onus lies with the Appellant to make his case that the breach of planning control and the use of the land, respectively, occurred continuously for the relevant period on the balance of probability.
12. Established case law sets out that evidence should not be rejected simply because it is uncorroborated. If the Council has no evidence to contradict the Appellant's version of events or make it less than probable, and the evidence is sufficiently precise and unambiguous, it should be accepted. For its part, in terms of the enforcement of the breach, the Council's involvement in the site did not commence until 9 August 2017; prior to this it was unable to provide any direct evidence of the use of the land.
13. The Notice concerns a number of fields that are linked to the A3052 by a rough lane. Generally, the land has a fall from north to south and east to west. A public right of way runs diagonally across the land from northeast to southwest. At what might be described as the heart of the land covered by the Notice in Appeal A, is a fairly large open-sided barn. The Appellant's case is that the caravans that are the subject of both appeals have been located in and around this barn for the relevant periods. This, he states, began in 2009 and continued without material breaks to the date that the Notice was issued, and that this use continues today.
14. When I visited the site, the barn was being used for the storage of a variety of materials and equipment. Whilst some of this could have been used for agricultural purposes, much of it was related to building work elsewhere. I also saw a boat and container there. A similar eclectic mix of materials, equipment and vehicles were on the land outside the barn. I saw three static caravans and a touring caravan. One of the statics was lying at a precarious angle and was not in use.
15. The Appellant's case, put briefly, is as follows. The first caravan, a small tourer, came onto the land in 1998. It belonged to a friend of his, Brett Archer. An agricultural storage barn was built in April 2007 and, in 2008, the touring caravan was placed inside this. In early 2009, the Appellant put a static caravan in the barn and John Coward, who was a friend of Mr Archer, lived in it from early 2009 to March 2012.
16. In February 2012, Jodi Canti rented some land from the Appellant for use by her horses and ponies. She moved a horse box onto the land, in which she lived, and when John Coward vacated the static caravan she moved into it. She lived on the land until Spring 2015. In January 2015, Peter Ayre¹ rented land from the Appellant for his horses, ponies and sheep and lived in a touring caravan on the other side of the hedgerow to the east of the barn. When work was undertaken to create a hardstanding around the barn, following an agricultural prior notification application, (Council reference WS/D/14/003016), the static caravan that was therein was moved out against the hedge to the east. Mr Ayres moved into the static caravan, where he lived from July 2015 to March 2016.

¹ He is described as Peter Ayre and Peter Ayres in the Appellant's submissions. Nothing turns on this, and I refer to him as Peter Ayre in this decision.

17. In January 2016, following the work to create the hardstanding, a touring caravan was placed in the barn and in March 2016 Ian Payne moved into this. Following Peter Ayre's vacation of the static caravan by the hedge, and its subsequent clean-up, Ian Payne moved into it.
18. A second static caravan was moved onto the land in April 2017. Ian Payne moved into this and stayed until January 2019, when he moved out before returning in May 2019. During his absence, the Appellant's daughter, Daisy Day, lived in the static caravan. Ian Payne returned to this caravan and Daisy Day moved out.
19. In January 2020, a third static caravan was moved onto the land. Ian Payne and his son, Dylan, moved into this in June 2020. Dylan Payne moved out between May and August 2021, but later moved back. Latterly, there was a relatively short period of residency by Ethan Middleton.
20. I found the evidence given by the Appellant and the other witnesses in respect of Mr Coward's occupation to be compelling. I found this to be particularly the case with Brett Archer, a friend who provided detailed evidence.
21. Jodi Canti's evidence was that she came to the land in February 2012. She rented land from Mr Day for horses and ponies and initially used her horse lorry as accommodation. Following John Coward's vacation of the caravan in the barn, she says she moved into it, where, she says, she stayed for between 2 and 3 years – leaving in Spring 2015.
22. From the evidence before me, on the balance of probabilities I find that she did rent land at the appeal site and that this was from 2012 as claimed. I find similarly in respect of her living in the horse lorry and moving into the static caravan in the barn, shown in a photograph [C80]. I read this photograph as showing the caravan to be reasonably level and would allow for its occupation with few, if any, problems for its occupants. The evidence produced by the Appellant of what he claims to be records of the receipt of rent from Jodi Canti, which fortuitously survived flooding in a barn where they were kept, dates from within the period when I find it probable that she was on the appeal site.
23. The Council produced evidence regarding her purchase of land at Colyton, in May 2014, and her subsequent use of that land. She bought the land through a company based in Warwickshire, though it is clear that she never lived at the address of the company. In September 2014, Ms Canti made an application [D137] for 'Office/Rest Room Equine/Animal-Shelter/Storage' on that land. The applicant's address she used on the application form was that of a friend in Colyton. On the application form, Ms Canti stated that the development had already commenced.
24. In support of the application, she provided information regarding her business which included foaling mares, caring for retired horses and providing holiday and short-term rest for sick or injured horses. She agreed in cross-examination (XX) that the horses required "a little extra looking after" and associated with this care was the provision of an animal shelter on the land for use during inclement weather [D159, D161].
25. Ms Canti set up a petition to 'Change UK Planning Laws', the aim of which was "to allow people to live on a piece of land". Although she could not specify the date of the petition, the first recorded comment was 5 October 2015. Therefore, the petition dated from or before this date.

26. Briefly, the reasoning she gave for the importance of her petition was as follows. Through no fault of her own, she became homeless; luckily, she had a piece of land and moved onto it, because she had nowhere else to go; and for 18 months she suffered harassment from the enforcement officers involved and complaints from third parties. The petition says she was given a bedsit by the Council, but this could have been used by someone else if "I had been allowed to stay on my field. I am not disturbing anyone and my shepherds [sic] hut cannot be seen as it is tucked away behind trees". This goes onto explain how relaxing planning law would benefit people and that she knows of many people who want to live on their own piece of land.
27. In her Examination in Chief, she said that she did not live on the land at Colyton. In her XX, she agreed that becoming homeless meant not having anywhere to live. Then it was put to her that when she said that she moved onto the land in the petition, this must have been meant in terms of living on the land. She did not deny this; Ms Canti's response was "If you want to interpret it that way". Later, in answering questions regarding neighbours at Colyton complaining about her living on the land, she reiterated that she did not live there as they claimed.
28. My interpretation of the evidence as a whole, is that Ms Canti moved onto the land at Colyton and lived there. The Council asserts that this was in May 2014, when she bought the land. I find that this, or quite soon after, was probably the case. She said in the 'Additional Information' supporting her application, that she spent between 35 and 45 hours a week tending the animals. As she said in XX, she worked from home; therefore, this points to the land being both her place of work and her home. Whilst there might have been an element of exaggeration in her petition, as is often the case when a person or organisation seeks to persuade others of their cause, this does not undermine my finding on this point.
29. An important part of my reasoning here is that Ms Canti said that she had been given accommodation by East Devon District Council ('EDDC'). My experience, given the shortage of accommodation for people in housing need, is that such offers are made to people in such need within an authority's administrative area. Ms Canti's assertions that she was given the accommodation "Because [she] asked them" and that she told EDDC that she "had somewhere, not permanent, far away" does not ring true. I find the Council's assertion in its Closing statement that the allocation of social housing, which is a precious resource to Councils, would have arisen from her occupation of the Colyton site.
30. Ms Canti said that the horses she kept on her land at Colyton were also those kept at the appeal site. As she had put it, the horses she kept had health issues that required a "little extra looking after", and she obtained planning permission for a shelter at Colyton. Her assertion that these same horses did not require a shelter on Mr Day's land is contradictory, and is especially difficult to accept as being correct given that she described the winter weather there as "cold, very cold" and "harsh". It seems unlikely that, as someone with such affection for horses, she would have kept the horses and lived on the appeal land throughout the period claimed, when she had more suitable facilities at Colyton. Furthermore, this would have negated the need to drive to and from Colyton to access equipment and materials for her business that she stored there, a location she described to the Inquiry as being "far away".
31. Although not determinative of itself, I found it odd that several of the witnesses, including the Appellant, could not initially recall Ms Canti's surname

in their evidence, given the claim that she had lived on the land for nearly 3 years.

32. In Closings, the Appellant effectively posed the question: what would Ms Canti have to gain from the appeal being allowed, given that she did not live on the land at Colyton? My answer to this is that it would give credence to her aim to change planning law, set out in the petition. I did not see this as necessarily equating to "an animus to proper planning control" as suggested by the Council, but more of a deep desire to see changes made to the planning system. In this regard, I note that she began the petition despite having already being given a Council bedsit. Therefore, she did not need to start the petition to gain accommodation but chose to do so to change the system and help others to live on their own land.
33. The next person that the Appellant stated lived on the land was a Peter Ayre. He was reported to have moved onto the land in January 2015. Therefore, I find that there was a significant interruption in the continuous use of the land for residential purposes; perhaps as much as 8 months. Thus, in or not long after May 2014, the 'ten-year clock' stopped, and re-started in January 2015.
34. Mr Ayre lived on the land until March 2016. Initially, this, according to the Appellant's Statutory Declaration, was "in a small caravan on the Land". At the Inquiry, he stated that the location of the small caravan was over the hedge, to the east of the barn. Jodi Canti refers to him in her evidence, saying she gave him the Appellant's contact details. Terry Barker and Scott Huxter refer to a man living on the land at this time, who kept sheep and horses in a field. Brett Archer says that Peter Ayre lived on the land, as claimed by the Appellant.
35. Following work to create a hardstanding around the barn, the static caravan that had been in the barn was moved close to the hedge to the east of the barn. There is little of what the Council describe as "objective evidence" of Mr Ayre living on the land. I agree with it that the photographs purporting to show the small caravan on the land cannot be read as doing so. However, I find that there was no evidence to make the Appellant's case here, which was precise and unambiguous, to be less than probable. Therefore, given the lack of any substantive evidence to the contrary, I have no reason to find against the assertion that, on the balance of probability, Peter Ayre did live on the land between January 2015 and March 2016.
36. The evidence shows that Ian Payne lived in a touring caravan in the shed from March 2016. After the mess in the static that Peter Ayres had lived in was cleared, Mr Payne moved into this. A second static that was in better condition was moved to the land and he moved into this, in April 2017. This is the version of events given by Messrs Payne, Day, Archer, Barker and Huxter; although Mr Huxter's evidence did not give precise dates for the events involving Mr Payne.
37. Again, given the evidence and the lack of substantive evidence to the contrary from the Council, I find that this was what happened on the balance of probability to the time that the Council began its investigations into the use of land at the appeal site. The first site visits by Council enforcement officers took place on 9 August and 11 October 2017. At the first of these, Adrian Powell says he saw a small touring caravan in the barn, with two statics close to the hedge. One of these was set at an angle, suggesting to him that it was not lived in. The other, he says in his PoE, had no indications of being in use; in this respect, he refers to the lack of waste bins and gas bottles. As a

consequence, he was of the view that they were being stored. He described the same scene at the time of his second visit.

38. In XX, he acknowledged that there were no contemporaneous notes or photographs before the Inquiry of the first site visit. Therefore, he was reliant on his memory. He said that he did not go inside the caravans at this site visit, nor did he see or speak to anyone. He agreed that if there were people living at the site, it was possible that they could be at work. In respect of the possibility that the generator serving the caravans might have been between them and the hedge, he said he felt that he would have looked behind the caravan, though there was not much room as he recalled. He agreed that water could have been drawn from the spring, as claimed, though he felt this was improbable.
39. I find that it was probable that Mr Day was evasive in his answers to Mr Powell in a telephone conversation on 9 April 2018; a call that Mr Day “vaguely” recalled. Mr Powell’s note of that call says that Mr Day said that the caravans are used on occasions when livestock needed to be tended overnight. Mr Day’s explanation that he equated caravans with touring caravans, rather than statics, when he was asked did not seem at all likely. In the note of the call, Mr Powell says he asked about caravans, in the plural. This would have had to have included static caravans, as there was only one tourer. Although Mr Day did not mention people living on the site, I found his approach at that time to be that of a person careful not to acknowledge occupation of the caravans. I did not take it as an admission that the caravans were not occupied.
40. There is nothing in the note of the conversation to suggest that Mr Powell was asking specifically about Mr Day’s personal use of the caravans; the reason for the call regarded the use of the caravans generally. On this point, I do not concur with the suggestion in the Appellant’s Closing Submissions that it was more than likely that this was what Mr Day understood.
41. Notwithstanding this conversation, I find that Mr Powell’s evidence did not cast sufficient doubt on the use of the land claimed by the Appellant at that time. I did not equate the evidence with the caravans being stored on the land.
42. The Council monitored events and received a further complaint in December 2018 [D27] in which “much activity...including an electricity supply being installed” was reported. A site visit was undertaken on 20 March 2019 where groundworks in the barn, an unconnected septic tank lying on the ground and various other works were seen and photographs taken. Again, for similar reasoning, Mr Powell found no evidence of occupation. The Council’s enforcement case was closed in September 2019.
43. A new case was opened, with Christopher Thompson as the case officer. Mr Thompson had direct knowledge of the site from 2020 to the date of the Inquiry. His PoE and oral evidence on the Ground (d) and s195 appeals was in two parts: that relating to his direct experience during this time; and that relating to the use of the site by Jodi Canti – the latter of which I have addressed above.
44. In respect of the former, following a complaint alleging 3 mobile homes on the land, he visited the site on 29 May 2020. Paragraph 15 of his PoE states that he saw two static and one touring caravan; he later clarified that this should have read three statics and a touring caravan, though nothing turns on this.
45. Following this, the Council wrote to Mr Day at his last known address. In response, a Deborah Day emailed to say that he did not live at that address

and gave contact details for him. In early June, Mr Day contacted Mr Thompson and a site visit was arranged, which happened on 9 July 2020. The same caravans were there, but in a different configuration with one on a raised platform. Mr Day told him that Mr Payne lived in that one and had done for about 7 months, having been on the land for about 2 years. He went on to say that there had been caravans on the site being used for residential purposes since about 2007. The ramifications of using caravans for residential purposes were discussed. The meeting was recorded in a contemporaneous note, in which reference to two unused caravans and one abandoned caravan is made.

46. The note says that Mr Day gave his address as being at Kilmington in Devon. A Planning Contravention Notice was sent to that address. This was not returned, though this cannot be held as being evidence that the use was not occurring. However, the Council established in this period of investigation that the site was being put to residential use and this led to the issuing of the Notice.
47. I am told that the complainant continued to monitor the site and found no evidence of the residential use of the caravans. However, I have no direct evidence from that person and as they did not appear this evidence was not able to be challenged by the Appellant. Therefore, I give this relatively little weight in my assessment.
48. From the evidence, I find it probable that Ian Payne stayed in the second static until January 2019, when he worked away. The Inquiry heard from Daisy Day, the Appellant's daughter, who said that she lived in the static vacated by Mr Payne from January to May 2019. She referred to her housing and health problems that had led to her moving about the area, staying in various places for short periods. I found her evidence to be compelling and that she occupied the static during this period.
49. Mr Payne said that as the work commitments that led to his leaving the site did not work out, he returned and resumed occupation of the second static. He would have left sometime after 14 March 2022, as this was the date that he signed his statutory declaration. From July 2020 his son Dylan lived with him. Dylan left the site between May and August 2021, but returned and was still resident there.
50. The Council made the point to Mr Payne that the second static was not level and that there were no signs of gas bottles serving the caravan [D32]. I find no reason to dispute Mr Payne's response that the gas was at the rear, out of site, and that the second static was level - the angle of the photograph gave the illusion that it was not. Overall, I found no reason to doubt the veracity of Mr Payne's evidence.
51. Taken individually and cumulatively, the direct experience of the Council's officers does not undermine the Appellant's case that the use alleged in the Notice and claimed in the certificate was being undertaken. However, this is to a large degree academic, as I have found that residential use on the land was not continuous by reason of the break when Jodi Canti lived at Colyton.
52. For the reasoning given above, I find that the Appellant has failed to demonstrate on the balance of probability that the land was continuously used for a mixture of agriculture and residential purposes for the required ten-year periods. As such, the appeal made under Ground (d) fails, as does that against the Council's decision to issue a certificate of lawfulness.

Appeal A Ground (f)

53. An appeal under Ground (f) is that 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. The purpose of the Notice is clearly to remedy the breach of planning control.
54. There are three areas in the Appellant's case: that the Notice should refer to residential purposes that are not ancillary to the use of the land; that the removal of the mobile homes goes beyond what is necessary to prevent residential use of the caravans that is not ancillary to the use of the land; and that the removal of the hardstanding, utility pipes and portalooos goes beyond what is necessary to remedy the breach of planning control.
55. In his XX, Mr Thompson on behalf of the Council correctly agreed that caravans might be brought onto the land for residential use that was ancillary to the agricultural use of the land. In its Closings, the Council agreed that if I felt it necessary to amend the requirements, I could. Whilst the Appellant understood the terms of the Notice, they might not be so clear to persons with an interest in the land in future. Therefore, the wording of the allegation and requirements should be changed to clarify the nature of the breach and what needs to be done to rectify this.
56. Given the purpose of the Notice, its requirement to remove the caravans from the land is reasonable and does not go beyond what is necessary. The result of my varying the requirements of the Notice would be that the siting of one or more caravans on the land for purposes ancillary to agriculture in future would be allowed. However, I was given scant evidence to show that one or more needed to be retained for that purpose at this time. However, if it were necessary in future, my decision would not preclude this from happening.
57. The evidence, including what I saw at my site visit, shows that the utilities and portaloo were not simply installed to serve the residential caravans. They have also been used in association with the agricultural use of the land. Whilst the hardstanding gives access to the caravans, it also served as a relatively dry and secure means of manoeuvring around, and accessing, the barn in respect of its agricultural use.
58. I will, therefore, omit the third of the Notice's requirements.

Appeal A Ground (g)

59. An appeal made under Ground (g) is that the period for compliance specified in the notice falls short of what should reasonably be allowed. No case is made by the Appellant that it would not be possible to comply with the requirement to remove the caravans. His case is that, due to a combination of the local housing market and their personal circumstances, Daisy Day and Dylan Payne who are living at the site would not have sufficient time to find alternative accommodation. In this regard, he made reference to the terms of the Human Rights Act 1998 ('HRA').
60. As the result of my decision will be that those living at the site would lose their homes, Article 8(1) of the HRA is engaged. In her evidence to the Inquiry, Daisy Day explained her issues and there was an opportunity for the Council to question or counter these. Therefore, I give this evidence greater weight than that I give to evidence given by Ian Payne in respect of his son, Dylan.

61. The question to be addressed is whether, in the circumstances, 6 months is a proportionate time to comply with the requirements of the Notice. Given the health issues, in particular those of Daisy Day, and the unsurprising problems finding accommodation in such an attractive coastal area, I find that 6 months falls short of what should reasonably be allowed.
62. A compliance period of 24 months, as requested by the Appellant, would call into question the expediency of the action in the first place and, as such, is too long. In the circumstances, a compliance period of 12 months would be appropriate, and I will vary the terms of the Notice accordingly.
63. Therefore, for the reasons given above, the Ground (g) appeal succeeds.

Conclusion on Appeal A

64. For the reasons given above, I conclude that Appeal A succeeds to a degree on Grounds (f) and (g). However, the appeal under Ground (d) should not succeed. I shall uphold the enforcement notice with variations.

Conclusion on Appeal B

65. For the reasons given above I conclude that the Council's refusal to grant a certificate of lawful use or development in respect of use of land 'From agricultural to a mixed agricultural and residential use' was well-founded and that the appeal should fail. I will exercise accordingly the powers transferred to me in section 195(3) of the 1990 Act as amended.

Roy Curnow

Inspector

APPEARANCES (in order of appearance)

For the Council:

Brendan Brett	Counsel, for Dorset Council
Adrian Powell	Dorset Council
Christopher Thompson	Dorset Council

For the Appellant:

Dr Ashley Bowers	Barrister, instructed by Battens Solicitors
Iain Cole	Solicitor, Battens Solicitors
Brett Archer	Witness
Daisy Day	Witness
Scott Huxter	Witness
Terry Barker	Witness
Ian Payne	Witness
Jodi Canti	Witness
Andrew Day	Appellant

DOCUMENTS PRODUCED AT THE INQUIRY

Appellant's Opening statement

Council's Opening statement

Paginated Lever Arch File with appeal documentation

Copy of Agricultural Prior Notification application form

Revised Location Plan for certificate of lawful use (Appeal B)

Council's Closing statement

Appellant's Closing statement