



Appeal Decision

Inquiry held on 23-25 June and 2 July 2026

Site visit made on 23 June 2026

by Peter Willows BA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 24 July 2026

Appeal Ref: APP/C3620/C/26/3377551

Land at Oak View, Apple Trees, Wood Lodge, The Maples and Yew Tree, River Lane, Leatherhead KT22 0AY

- The appeal is made under section 174 of the Town and Country Planning Act 1990 (as amended).
- The appeal is made by Ms Rose Doherty against an enforcement notice issued by Mole Valley District Council.
- The notice was issued on 12 December 2025.
- The breach of planning control as alleged in the notice is Without planning permission, the material change in use of the Land to use as a residential caravan site for both 1. Gypsies and travellers and 2. Non-gypsies and travellers ("the unauthorised use")
And all associated works facilitating the material change of use which includes:-
 - i) The erection of fencing, gates and means of enclosure
 - ii) The laying of hard surfaces
 - iii) The erection of brick bases, steps and pillars for caravans
 - iv) The erection of outbuildings and/or structures, and canopies
 - v) The installation of septic/sewage disposal tanks and associated pipework.
- The requirements of the notice are:

EITHER

- (a) Cease the use of the land as a residential caravan site for both gypsies and travellers and non-gypsies and travellers;
- (b) Remove all mobile homes and caravans from the Land;
- (c) Remove the fencing, gates and enclosures, the location of which is shown on the plan attached to this Notice;
- (d) Remove the brick bases for each caravan and associated steps and pillars;
- (e) Remove the areas of hard surfacing, the locations of which are shown on the plan attached to the Notice;
- (f) Remove all septic/sewage disposal tanks and associated pipework;
- (g) Remove all outbuildings and/or structures and canopies; and
- (h) Remove all resulting materials, debris and rubbish from the Land.

OR

- (a) Bring the use of the Land into a use in accordance with the terms and conditions of planning permission with reference MO/2017/1932 (granted on appeal). This includes cessation of the use of the Land by non-gypsies and travellers;
 - (b) Remove all caravans over and above those indicated on plans approved under the planning permission;
 - (c) Remove all hardstanding over and above those indicated on the plans approved under the planning permission;
 - (d) Remove all fences, gates and enclosures over and above those indicated on plans approved under the planning permission;
 - (e) Remove all brick bases over and above those indicated on plans approved under the planning permission; and
 - (f) Remove all outbuildings and/or structures, canopies and septic/sewage disposal tanks and associated pipework over and above those indicated on plans approved under the planning permission.
- The period for compliance with the requirements is 6 months.

- The appeal is proceeding on the grounds set out in section 174(2)(a), (b), (c), (d), (f), (g) of the Town and Country Planning Act 1990 (as amended). Since an appeal has been brought on ground (a), an application for planning permission is deemed to have been made under section 177(5) of the Act.
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Decision

1. The appeal is allowed and the enforcement notice is quashed.

Application for costs

2. An application for costs was made by the appellant against the Council. That application is the subject of a separate Decision.

Preliminary Matters

3. Prior to the inquiry, I was advised that there was a failure on the appellant's part to display a notice of the inquiry on the site for the required period of time. However, since the Council displayed such a notice at the site, no injustice was caused.
4. Additionally, the Council advised that the Fetcham Residents' Association, which had made representations on the appeal, had not been notified of the inquiry. However, written confirmation from the Residents' Association was received on the opening day of the inquiry, confirming that it would not have attended the event anyway. Consequently, it is clear that no injustice was caused as a result of the oversight.
5. All formal evidence at the Inquiry was taken on solemn affirmation.
6. The final day of the inquiry was a virtual rather than in-person session, and included a round-table discussion on the issues of character and appearance and pitch need/supply. All sworn evidence had previously been given at the in-person sessions.

The Requirements of the Enforcement Notice

7. Section 5 of the notice sets out the requirements and is in the form of two distinct options. Thus, there can be compliance with the notice by following either the requirements of section 5.1 or those set out at 5.2.
8. The only reference to the use of the land at section 5.2 is at 5.2(a), which requires the use of the land to be brought into accordance with the terms and conditions of planning permission ref MO/2017/1932. However, that planning permission relates only to the eastern part of the site. The western part of the site (hereafter 'the extension land') falls within the Green Belt and accounts for a significant part of the land targeted by the enforcement notice, although rather less than half of it.
9. Since there can be no breach of the terms and conditions of the existing planning permission as a result of anything taking place on land outside that planning permission, it follows that Requirement 5.2(a) does not require the cessation of the use of the extension land. That, plainly, significantly undermines the effectiveness of the notice.

10. Moreover, section 173(11) of the Act states:

Where—

(a) an enforcement notice in respect of any breach of planning control could have required any buildings or works to be removed or any activity to cease, but does not do so; and

(b) all the requirements of the notice have been complied with, then, so far as the notice did not so require, planning permission shall be treated as having been granted by virtue of section 73A in respect of development consisting of the construction of the buildings or works or, as the case may be, the carrying out of the activities.

11. Thus, by failing to require the use to cease on the extension land, the notice could have the unintended consequence of permitting the very use it seeks to control, albeit with requirements relating to the removal of caravans etc.
12. At the inquiry, the Council acknowledged this situation, but argued that it could be addressed by varying the notice. Section 176(1) of the Act empowers me to (a) correct any defect, error or misdescription in the enforcement notice; or (b) vary the terms of the enforcement notice, provided there would be no injustice to the appellant or the local planning authority. The Council's proposal would replace the 2 sets of alternative requirements in the notice with a single set of requirements, which would, amongst other things, require the cessation of the use across the whole of the site targeted by the enforcement notice.
13. The powers under s176(1) are subject only to the question of injustice. Here the Council argues that there would be no injustice. It is obvious that the Council did not intend to grant planning permission on part of the site via the enforcement notice and, it is said, there could be no expectation of such an outcome on the part of the appellant. The redrafted notice would allow the use of the land to revert to the previous lawful use. There would not (indeed could not¹) be any loss of existing lawful rights.
14. I have a degree of sympathy with the Council's position. In particular, I am not convinced that the loss of a planning permission via s173(11) is, on its own, unjust, since the appellant would not have had a reasonable expectation of such an outcome from a notice evidently intended to control the use of the land.
15. Nevertheless, the redrafted notice would plainly be more onerous than the one issued by the Council, since it would require the use to cease on the whole of the site, rather than just a part of it (albeit the larger part). Even though caravans would need to be removed, the use could continue on the extension land if the notice were upheld as issued. Removing that option means that the amendments proposed by the Council would be a very significant change in my view and would represent a serious worsening of the appellant's position as a result of the appeal. The effect here would be so marked that there would be injustice to the appellant. Consequently, I am unable to accept the changes proposed by the Council and will consider the appeal on the basis of the notice as issued.

¹ Such rights being protected by s57(4) of the Act

Ground (b)

Background and the basis of the ground (b) appeal

16. Ground (b) is concerned with whether or not the matters stated in the notice have occurred. The appellant's case on this ground focuses on the questions of the planning unit and the occupation of the site by people not meeting the Gypsy/Traveller definition. The burden of proof falls on the appellant and the standard of proof is the balance of probability.
17. The appeal site has a long planning history. Most of the site benefits from a planning permission granted at appeal in 2020 for use as a gypsy and traveller site with 4 pitches, without compliance with certain conditions attached to a previous planning permission² (hereafter 'the 2020 permission'). That permission, which included also adjacent land at 'The Glade', remains extant. Condition 1 of that permission limits occupation of the site to Gypsies and Travellers, while Condition 2 places a limit of 11 caravans in total, with a maximum of 6 static caravans. A significant part of the land targeted by the enforcement notice (the extension land) is not covered by that permission.

The planning unit

18. The starting point for assessing a material change of use is to identify the correct planning unit. It is implicit in the drafting of the notice that the Council regards the land targeted as a single planning unit. The appellant argues that there are actually 6 separate planning units, comprised of 5 caravan sites and the access.
19. The law on planning units is well known. The judgement in *Burdle & Williams v SSE & New Forest DC [1972] 1 WLR 1207* identified 3 broad categories:
 - a) A single planning unit where the unit of occupation has one primary use and any other activities are incidental or ancillary to the primary use.
 - b) A single planning unit where the unit of occupation is in a mixed use because the land is put to two or more activities and it is not possible to say that one is incidental to another.
 - c) The unit of occupation comprises two or more physically separate areas that are occupied for different and unrelated purposes. Each such area ought to be considered as a separate planning unit.
20. The judgement adds '*It may be a useful working rule to assume that the unit of occupation is the appropriate planning unit, unless and until some smaller unit can be recognised as the site of activities which amount in substance to a separate use both physically and functionally.*'
21. The starting point, therefore, is to identify the unit(s) of occupation.
22. The enforcement notice site comprises 4 separately owned parcels of land – one being the access and the others containing caravans. However, the appellant says there are actually 6 planning units, based on the different areas occupied by 5 families, with the common access forming the 6th unit. The evidence of the occupiers of the site was that they occupy their own areas and do not make use of

² Appeal Ref: APP/C3620/W/18/3205739

the areas occupied by other families. The communal accessway is not owned by any of the occupiers of the appeal site.

23. However, I am not persuaded that the use of different parts of the site by individual families means that those areas must be treated as separate units of occupation. The land has been developed together as a caravan site. For planning purposes³, 'caravan site' has the meaning given in section 1(4) of the *Caravan Sites and Control of Development Act 1960*, which is 'land on which a caravan is stationed for the purposes of human habitation and land which is used in conjunction with land on which a caravan is so stationed'. That, it seems to me, includes all of the land occupied by caravans and used for living (ie the pitches), together with the access serving it, which the site cannot function without. The site as a whole is used for a common purpose and is served by a common access. Overall, it appears to me that there is a single unit of occupation comprised of the site as a whole.
24. While ownership is a relevant consideration, I do not see that it is critical to defining the occupation of the land or the planning unit in this case. Indeed, the appellant's claim of 6 planning units does not mirror the 4 parcels of land in terms of ownership. Moreover, the access is used by all the occupiers of the site (and, to that extent, could be said to be 'occupied' by them), even though none of them own the land.
25. It is true that different branches of the appellant's extended family are located in different areas of the site. However, those areas are not occupied for different and unrelated purposes; rather, the site as a whole is used as a residential caravan site. Occupation is currently by the same extended family and has predominantly been so in the past, but that is not critical; it is commonly the nature of caravan sites that they are occupied by people who are entirely unrelated. It is natural that individuals should focus on their own part of the site in terms of where they spend their time, store their personal items and so on, but they are still occupants of the caravan site as a whole.
26. Individual pitches are shown on a plan referenced in the 2020 planning permission. Moreover, the areas occupied by individual families are separated by substantial fences, with gates to the access road. However, while this reinforces the individuality of the pitches, it does not alter my view that this is a single planning unit, devoted to a single caravan site use. Thus, I am not persuaded that this situation aligns with *Burdle* category (c).
27. The appellant argues that identifying a single planning unit was a discriminatory and stereotyped approach, but I can see no evidence of that; rather it is a reflection of the nature of what is actually occurring at the site and is consistent with the unremarkable proposition that a single caravan site can be occupied by multiple families, regardless of whether or not those families are related to one another. The fact that houses might be regarded as individual planning units does not mean that the same necessarily applies to caravan pitches, which are clearly very different things.
28. I have been referred to the Court of Appeal decision in *Royale Parks Ltd v Secretary of State for Housing, Communities and Local Government [2021] EWCA Civ 1101*. However, the planning unit appears to have been of limited relevance in that case and it seems in any event that the inspector's conclusion on the planning

³ See s336 of the TCPA 1990

unit turned on the facts of the case, as it does here. The case of *Rawlins v Secretary of State for the Environment; Gregory v Secretary of State for the Environment* also confirms that establishing the planning unit is a matter of fact and degree, which supports the approach I have taken.

29. I conclude that the site targeted by the notice is a single planning unit.

Occupation by non-Gypsies/Travellers

30. The appellant argued that the allegation of occupation by non Gypsies/Travellers had not occurred across the whole site. Given my finding of a single planning unit, it is not necessary for the Council to show such occupation of each of the planning units the appellant claims. By the close of the inquiry the appellant did not dispute that there had been an element of non-Gypsy/Traveller occupation of some pitches. Nevertheless, there were disputes on the facts relating to some individuals, and I address that here. The relevant definition of a Gypsy/Traveller is to be found in Annex 1 of the *Planning Policy for Traveller Sites* (PPTS).
31. The Council has provided significant evidence in support of its claim of non-Gypsy/Traveller occupation prior to issuing the notice. In particular, it has provided notes of a visit by Council officers on 17 July 2025. This identified a number of individuals who stated that they were renting caravans at the site and who, the Council says, do not meet the Gypsy/Traveller definition.
32. Furthermore, the Council has provided copies of 2 Facebook posts advertising mobile homes for rent on the site in September and October 2025, suggesting that the units were marketed to the general public. None of the appellant's witnesses admitted to any knowledge of the posts. However, there is nothing before me to suggest that anyone other than those in control of the site would have any interest in posting such adverts, and it seems inconceivable that anyone would do so. Moreover, the interviews the Council carried out with some occupants of the site suggest that they were paying rent to people living on caravans on the site. I can see no reason to doubt that evidence. The Council has also provided a copy of a tenancy agreement from August 2024 for a caravan on the site.
33. The appellant argues that the Council cannot show clearly that all the individuals they refer to are not Gypsies/Travellers. However, the burden of proof falls on the appellant, not the Council. None of the individuals concerned appeared at the inquiry to confirm their status one way or the other.
34. Jimmy Doherty gave evidence that the person identified by the Council as living at the Oak View pitch was a Romany Gypsy and was not paying rent. That contradicts the Council's report, which indicates that the individual on Oak View, who had two other people in the household, was paying £1,000 a month in rent. The rent is relevant because of the appellant's position that only members of the settled community would be charged any rent at all⁴. Mr Doherty was unable to offer any explanation as to why the individual on Oak View would claim to be paying him rent if that were not the case. Overall, I consider it more likely than not that those on the Oak View pitch did not meet the Gypsy/Traveller definition.
35. There is only limited detail of the man identified as 'Stuart', who was apparently living in a caravan on the Yew Tree pitch at the time of the 2025 site visit. Rose

⁴ Ned Doherty – cross examination

Doherty said in evidence that he is a Traveller, but the evidence was rather vague and lacking in detail. The Council's notes also lack detail, but state that he was living at the site because it was 'cheaper than renting a house', which suggests to me that rent of some amount was being paid. Overall, I consider it more likely than not that this person did not meet the Gypsy/Traveller definition.

36. But regardless of whether I am right regarding the above individuals, there is nothing to cast genuine doubt on the Council's claim of non-Gypsy/Traveller occupation of a total of 4 caravans on the Apple Trees and Wood Lodge plots, one by a family of 4. Thus, it is clear that occupation by non-Gypsy/Travellers has occurred. It is possible that there were more non-Gypsy/Travellers, given the number of caravans on the site at the time, but it is equally possible that some or all of the other caravans were occupied by people meeting the Gypsy/Traveller definition. Indeed, judging by the number of members of the appellant's extended family now occupying the site, it appears likely to me that this was the case.
37. I conclude that the enforcement notice identified the correct planning unit and that there was occupation by people who did not meet the Gypsy/Traveller definition. Accordingly, the appeal on ground (b) fails.

Ground (c)

38. Ground (c) is concerned with whether or not the matters stated in the notice constitute a breach of planning control. There is a degree of overlap with ground (b) in this instance, inasmuch as the allegation concerns a material change of use and the appellant's case on ground (c) focuses on the materiality of the change concerning the land subject to the 2020 planning permission. The burden of proof falls on the appellant and the standard of proof is the balance of probability.
39. The appellant relies on the 2020 permission to argue that there has been no breach of planning control in respect of most of the site. It is said that there is no material difference between a caravan site occupied by Gypsies and Travellers, as permitted in 2020, and one occupied by individuals not meeting the relevant definition. The discussion below relates only to the land subject to the 2020 permission – there has clearly been a material change of use concerning the extension land.
40. The starting point is that the land has planning permission for 'use of land as a gypsy and traveller site with 4 pitches'. Is the matter alleged in the notice – 'use of the Land to use as a residential caravan site for both 1. Gypsies and travellers and 2. Non-gypsies and travellers' – a materially different use? In order for there to be a material change of use, there would need to be a change in the character of the use of the land. That could include on-site or off-site impacts, but wider planning purposes may also be relevant.
41. It is clear that the permission granted in 2020 was for a caravan site, albeit of the particular type specified in the planning permission, read as a whole. As previously noted, the relevant definition of a caravan site is 'land on which a caravan is stationed for the purposes of human habitation and land which is used in conjunction with land on which a caravan is so stationed'. The use permitted was plainly consistent with the definition of a caravan site. The very nature of a Gypsy/Traveller site is indicative of the use of caravans for human habitation. The planning permission does not allow commercial activities, which are prohibited by a planning condition.

42. It is clear that there have been (and still are) more caravans on the site than referred to in the planning permission, but the Council has made it clear that it does not claim that there has been a material change of use due to intensification⁵. While the notice makes reference to physical works, none of the structures I saw on the site were indicative of a different use and there is agreement that the hardstanding within the 2020 permission area is now lawful. Thus, the key difference between the use described in the planning permission and the matter alleged in the enforcement notice is the reference to use by 'Non-gypsies and travellers'.
43. There is nothing before me to suggest any material on-site or off-site impacts arising from the occupation of the site by people not meeting the definition. Indeed, Mr Whittaker confirmed during cross examination that he was unable to identify any way in which non-Gypsy/Travellers would occupy the site differently to those meeting the definition. Having studied the photographs of the 2025 site inspection, it appears to me that it would have been impossible to tell that the site was not in wholly Gypsy/Traveller occupation without interviewing the occupants. Nor does it appear to me that the increase in the number of caravans, their layout or any operational developments have changed the essential character of the use.
44. It is evident that local residents have noticed significant changes at the site and impacts arising from it – increased traffic movements being just one example. Such changes may well be the result of the breaches of planning control that have plainly taken place at the site as a whole, including the material change of use of the extension land and the increase in the number of caravans, in breach of Condition 2 of the planning permission. It does not, however, show that there has been a material change of use of the land with planning permission.
45. As the Council points out, there are specific policies that address the question of Traveller sites, and thus the identity of the occupiers of a site is often a relevant planning matter. Relevant policies include Policy H5 of the Mole Valley Local Plan 2020-2039, The Framework and the PPTS. In my view, the ability of the Council to meet its obligations in terms of Traveller pitches is a relevant consideration in deciding whether there has been a material change of use in this instance. The Council draws the distinction between Gypsy and Traveller caravan sites – which are subject to the policies of the PPTS – and residential park home sites.
46. However, I must consider the specific matter before me. The notice is not concerned with a generic park home site but rather use as a residential caravan site for both Gypsies/Travellers and Non-Gypsies/Travellers. On the face of that wording it is clear that the use includes Gypsy and Traveller accommodation. The record of the 2025 site inspection indicates that the site continued to be occupied by the appellant and her extended family and contained day rooms and touring caravans – all indicative of continuing Gypsy use. There is nothing before me to suggest that the provision of Gypsy/Traveller pitches at the site has been reduced at any relevant time below the number contemplated by the planning permission.
47. On the contrary, it appears that the site has primarily been acquired and used throughout for providing accommodation for the extended Doherty family, who are Gypsies. Thus, the objective of meeting the needs of Gypsies and Travellers in the

⁵ Neill Whittaker – evidence in chief

locality has not been compromised and the renting of some caravans to non-Gypsy/Traveller occupants, which has clearly been at a much lesser scale than occupation by the appellant and her extended family, has not materially altered the character of the site. I have not been made aware of any policy objective of prohibiting the sharing of sites between those who do and do not meet the definition. Indeed, the PPTS warns against developing Traveller sites in a way that isolates the occupants from the rest of the community (Paragraph 27).

48. The Council refers to the requirements of Local Plan Policy H7, which seeks to restrict park homes to residential park home sites. However, the supporting text makes clear that the policy applies only to existing and proposed residential park home sites, and the policy appears to me to be of limited relevance to the particular circumstances of this case. It is not of such significance as to suggest that a material change of use has occurred here.
49. There has clearly been a substantial increase in the number of caravans and occupiers; that was the case when I inspected the site and it seems that numbers were higher still in the period leading up to the issuing of the notice. However, the essential character of the site remains indistinguishable from that of a Gypsy caravan site. Although the Council argues that the changes on the appeal site as a whole are such that a new planning chapter has been created, that is not the case in respect of the land subject to the planning permission; the site has been extended and conditions have been breached, but there has been continuity in terms of the use of most of the site targeted by the notice.
50. I conclude that the matters stated in the notice do not amount to a breach of planning control in respect of the land subject to the 2020 planning permission. Planning conditions have been breached, but that is a different thing. In reaching that view I have had regard to the appeal decision concerning a caravan park at Evesham, within the district of Wychavon⁶, in which the inspector concluded that there had been no change of use compared to an extant planning permission for a Gypsy caravan site. However, I do not see that that case establishes any wider principle which is determinative, and I have considered the appeal before me on the specific facts of the case.
51. At the inquiry I sought the Council's view as to what action I should take in the event that I concluded that there was not a material change on the land with planning permission. The Council's view was that the notice could nevertheless be upheld, since it was clear that there had been a material change in respect of the extension land. However, the notice alleges a breach of planning control consisting of a material change of use across the whole site, and my finding above means that that is not the case for the larger part of the site. In my view, the enforcement notice should not remain unchanged in these circumstances; the notice is not a proper reflection of what has taken place – a defect which infects the deemed planning application.
52. Is it possible to correct the notice using my powers under s176(1) of the Act? I can see two potential options; cutting down the site to exclude the land with planning permission or correcting the notice to address the breach of condition(s) rather than the change of use alleged.

⁶ Appeal Ref: APP/H1840/C/25/3375971

53. Cutting down the site would not cause injustice to the appellant, since it would reduce the notice in its scope rather than changing the nature of the allegation. However, the land subject to the planning permission accounts for the majority of the site. Thus, the intentions of the notice would be very much curtailed. Furthermore, as I have already commented, the remaining area targeted by the notice could gain a planning permission for the use - an effect the Council clearly did not intend. Thus, the notice would be rendered so ineffective – perhaps even counter-productive from the Council's perspective – as to negate its purpose. Quashing the notice would allow the Council to assess the prospects of issuing a revised notice under the provisions of s171B(4)(b) of the Act.
54. I have considered the prospect of correcting the notice instead to allege a breach of the condition controlling the occupation of the site (Condition 1) in respect of that land subject to the planning permission. However, the reality is that this would represent a significantly different breach. The Council has not asked me to make such a change and it seems to me that the appellant would be responding to a very different thing if the allegation were to be re-cast to refer to a breach of conditions. This would, in particular, change the nature of the deemed planning application and the arguments relating to the ground (a) appeal. Thus, there would be injustice for the appellant.
55. The same would apply to a breach of Condition 2, which controls the number of caravans. And as before, the problem concerning the requirements of the notice on the extension land would remain. I am also mindful that interested parties would be responding to a different breach of planning control, and that could also affect the case they may wish to put, which raises a further question of natural justice.
56. I therefore conclude that the change of use alleged does not amount to a breach of planning control in respect of most of the site. It is not possible to correct the notice using the powers under s176(1) of the Act, since injustice would be caused were I to do so.

Conclusion

57. For the reasons given above, I conclude that the appeal should succeed on ground (c). The enforcement notice will be quashed.
58. In these circumstances, the appeal on grounds (a), (d), (f) and (g) and the application for planning permission deemed to have been made under section 177(5) of the 1990 Act (as amended) do not fall to be considered.

Peter Willows

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Michael Rudd, Barrister. Instructed by GPS Ltd

Who called:

Jimmy Doherty

Ned Doherty

Charlie Doherty

Sarah Doherty

Rose Doherty

Matthew Green – GPS Ltd

FOR THE LOCAL PLANNING AUTHORITY:

Scott Stemp, Counsel. Instructed by Ivy Legal for MVDC

Who called:

Neill Whittaker – Senior Planning Associate – Ivy Legal Ltd

Andrew Barber* - Planning Policy Officer, MVDC

Duncan Clarke* – Planning Policy Manager, MVDC

Steve Jarman* - Head of Traveller Assessments, ORS Ltd

* Round table session only

INTERESTED PARTIES:

Alice Cuffe

DOCUMENTS ACCEPTED AT THE INQUIRY

1. Statement of Common Ground dated 23 June 2026
2. Opening submissions for the appellant
3. Opening submissions for the Council
4. Email from Richard Bradfield, Fetcham Residents Association
5. Email from Ian Anderson, Fetcham Residents Association
6. Rebuttal Statement of Steve Jarman
7. Witness Statement of Jimmy Doherty dated 23 June 2026
8. Witness Statement of Ned Doherty dated 23 June 2026
9. Witness Statement of Charlie Doherty dated 23 June 2026
10. Witness Statement of Sarah Doherty dated 23 June 2026
11. Witness Statement of Rose Doherty dated 23 June 2026
12. Schedule of pitch requirements
13. Royale Parks Ltd v SoS for Housing, Communities and Local Government
14. Suggested conditions - MVDC
15. Suggested conditions – appellant
16. Drawing No 12_485G_004 – Planning Units
17. Meaning of Gypsies and Travellers for the Purposes of Section 225 of the Housing Act 2004
18. Rawlins v Secretary of State for the Environment; Gregory v Secretary of State for the Environment [1988]
19. Titchfield Festival Theatre Ltd v SSHCLG & Fareham BC (Rev 1) [2026] EWCA Civ 368
20. Council's closing submissions
21. Appellant's closing submissions