APPLICATION FOR A LAWFUL DEVELOPMENT CERTIFICATE FOR THE PROPOSED REPLACEMENT OF A CARAVAN FOR ANCILLARY RESIDENTIAL USE, LAND AT WILD THORN FARM, ASHBOURNE ROAD, BOTTOMHOUSE, LEEK, ST13 7EY

SUPPORTING STATEMENT

Submitted on behalf of Cara Tissandier by

MH Planning Associates

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SUPPORTING STATEMENT

1. Introduction:

1.1 This application is submitted under the provisions of Section 192 of the Town and Country Planning Act 1990 (as amended by Section 10 of the Planning and Compensation Act 1991) which states that if any person wishes to ascertain whether:

(a) any **proposed use** of buildings or other land, or
(b) any operations proposed to be carried out in, on, over or under land,

would be lawful, they may make an application for the purpose to the Planning Authority specifying the land and describing the use or operations in question. If, on an application under this section, the Planning Authority are provided with information satisfying them that the use or operations described in the application would be lawful if instituted, or begun at the time of the application, they should issue a **Lawful Development Certificate** to that effect.

1.2 The application is being submitted in order to seek Staffordshire Moorlands District Council's confirmation that the **proposed siting of a replacement caravan**, within the garden grounds of Wild Thorn Farmhouse, **for ancillary residential use**, would be lawful having regard to the provisions of the 1990 Act. The new caravan will replace an older caravan that had been on the site for 18+ years, and was used by the previous owners as a residential 'annex' to the main dwelling.

2. Site Description:

2.1 Wild Thorn Farm is located on the A523, south east of Bradnop and north west of Bottomhouse. The land and buildings that comprise the farm are approximatly 9 acres in total area. The application site comprises Wild Thorn Farmhouse, and its garden grounds, as outlined in red on the submitted location and site plans.

3. Relevant Planning History

3.1 There is a current application for the proposed demolition of an existing

barn and store, and the erection of a multi-purpose agricultural building, pending consideration (LPA reference SMD/2017/0123).

4. Supporting Statement and Evidence:

4.1 As the current application falls to be determined having regard solely to matters of evidential fact and law, with the onus of proof on the applicant, there is no requirement for it to be publicised under the provisions of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Similarly, as the policies of the Development Plan (or the National Planning Policy Framework) are not relevant to the determination of an application submitted under the provisions of Section 192, any concerns regarding potential impact on the character or appearance of the area are not matters that the Council can attach any weight to.

4.2 Furthermore, in appeals which raise legal issues where the onus of proof is on the appellant, the Courts have held that the relevant test of the evidence on such matters is the "balance of probability". As this test will accordingly be applied in any appeal against their decisions, planning authorities should therefore not refuse a Certificate because the applicant has failed to discharge the stricter, criminal burden of proof beyond reasonable doubt. Moreover, the applicant's own evidence does not need to be corroborated by independent evidence in order to be accepted. If the planning authority has no evidence to contradict or otherwise make the applicant's version of events less than probable, this is not in itself a valid reason to refuse the application.

4.3 Planning permission can only be required where **development** takes place, and development is defined in Section 55(1) of the Town and Country Planning Act 1990 as being:

> "the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land."

4.4 This definition has two 'legs'; one involving permanent **physical alterations** to land, and the other **material changes of use** of buildings or land.

4.5 The **caravan** to be **sited** on the land the subject of the current application will comply with the statutory definition of a caravan in every respect. **No operational development** as defined by Section 55(1) will take place.

4.6 Having regard to the above, the central questions to be asked when deciding whether or not to issue the Certificate of Lawful Use applied for will therefore be:

a) Has there been a caravan sited on the land for more than 10 years?
b) Will the replacement 'unit' also be a caravan as defined in the Caravan Sites and Control of Development Act 1960 (as amended)?
c) Will the replacement caravan be sited within a defined residential planning unit? and
d) Will the replacement caravan continue to be used solely for purposes ancillary to the use of that defined residential planning unit?

Taking each of the questions in turn:

Has there been a Caravan sited on the Land for more than 10 years?

4.7 Attached in **Appendix 1** are three aerial photographs of the application site, taken in 2003, 2006 and 2016 respectively. In each of these a caravan can clearly be seen to the north-west of the farmhouse (circled in red).

Photograph 1: Photograph from Sales Particulars (http://photos.mouseprice.com/Media/propertyadd/342/62_/157/95_/IMG/_01/34262_15795_IMG_01.jpg

4.8 The same caravan is clearly shown on the OS location plan submitted with the current application, and can be seen to the left of the farmhouse in Photograph 1 above, which has been taken from the recent sales particulars. This caravan was already in-situ when the previous owners of Wild Thorn Farm purchased the property in 1999. They used it throughout their ownership as a residential 'annex' to the main dwelling.

Will the Replacement 'Unit' also be a Caravan?

4.9 Section 29 (1) of the **Caravan Sites and Control of Development Act 1960** ("The 1960 Act") defines a caravan as "… 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) and any motor vehicle so designed or adapted but does not include:

a) Any railway rolling stock which is for the time being on rails forming part of a railway system, or
b) Any tent."

4.10 This definition was modified by Section 13(1) of the **Caravan Sites Act 1968** ("The 1968 Act"), which deals with **twin-unit caravans**. Section 13 (1) permits with the definition:

"A structure designed or adapted for human habitation which:

a) 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
b) 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), shall not be treated as not being (or not having been) a caravan within the meaning of Part 1 of the Caravan Sites and Control of Development Act 1960 by reason only that it cannot lawfully be moved on a highway when assembled."

4.11 Section 13(2) of the 1968 Act further prescribes the following maximum dimensions for twin-unit caravans:

a) length (exclusive of any drawbar); 60 feet (18.288 metres);
b) width: 20 feet (6.096 metres);
c) overall height of living accommodation (measured internally from

the floor at the lowest level to the ceiling at the highest level): 10 feet (3.048 metres).

4.12 The **Caravan Sites Act 1968 and Social Landlords (Permissible Additional Purposes) (England) Order 2006 (Definition of Caravan) (Amendment) (England) Order 2006** has now amended Section 13(2) of the 1968 Act to increase the maximum dimensions of a caravan to:

a) length (exclusive of any drawbar) - 65.616 feet (20 metres);
b) width - 22.309 feet (6.8 metres);
c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level) - 10.006 feet (3.05 metres).

4.13 To be a caravan as so defined three tests must therefore be passed; the 'size test', the 'construction test' and the 'mobility test'. The proposed caravan will pass these tests, and will thus fulfil the statutory definition in every way.

Will the Replacement Caravan be sited within a defined Residential Planning Unit?

4.14 The residential planning unit within which the proposed caravan would be sited comprises Wild Thorn Farmhouse, and its immediate garden grounds, as outlined in red on the submitted plan.

4.15 The leading case of **Burdle v Secretary of State for the Environment [1972] 3 All ER 240** sets the test for determining the extent of the planning unit. Three broad categories of planning unit were identified by Bridge J, who stated:

> "First, whenever it is possible to recognise a single main purpose of the occupier's use of his land to which secondary activities are incidental or ancillary, the whole unit of occupation should be considered. That proposition emerges clearly from **G Percy Trentham Ltd v Gloucestershire County Council [1966] 1 WLR 506**, where Diplock LJ said, at p 513:
>
> > *"What is the unit which the local authority are entitled to look at and deal with in an enforcement notice for the purpose of determining whether or not there has been a 'material change in the use of any buildings or other land'? As I suggested in the course of the argument, I think for that purpose what the local authority are entitled to look at is the*

whole of the area which was used for a particular purpose, including any part of that area whose use was incidental to or ancillary to the achievement of that purpose."

However, secondly, it may equally be apt to consider the entire unit of occupation even though the occupier carries on a variety of activities and it is not possible to say that one is incidental or ancillary to another. This is well settled in the case of a composite use where the component activities fluctuate in their intensity from time to time, but the different activities are not confined within separate and physically distinct areas of land.

Thirdly, however, it may frequently occur that within a single unit of occupation two or more physically separate and distinct areas are occupied for substantially different and unrelated purposes. In such a case each area used for a different main purpose (together with its incidental and ancillary activities) ought to be considered as a separate planning unit."

4.16 In summary, it should therefore always be assumed that the unit of occupation is the appropriate planning unit unless and until some small unit can be recognised as the site of activities which amount in some substance to a separate use both physically and functionally. The ***Planning Encyclopaedia*** similarly points out that both physical and functional separation are required before a smaller unit can be identified, since without physical separation there is no smaller physical area which can be identified as a separate unit, and without functional separation the ancillary link remains.

4.17 In the current case however, having regard to Burdle, it is considered that the extent of the applicant's ownership extends beyond what could reasonably be regarded to be the 'curtilage' of the dwelling. In **Dyer v Dorset County Council [1988] 3 W.L.R. 213** it was held that "in the absence of any definition, curtilage bore its restricted and established meaning connoting a small area forming part or parcel with the house or building which it contained or to which it was attached". This will be a matter of fact and degree in each case. The definition contained in the ***Oxford English Dictionary*** is also often used; this states that curtilage is "a small courtyard, garth or piece of ground attached to a dwellinghouse and forming one enclosure with it or so regarded by the law the area attached to and containing a dwellinghouse and its outbuildings".

4.18 Similarly, in the case of **The Hon David McAlpine v Secretary of State [1995]**

LGR 249 it was held that a curtilage is constrained to a small area about a building, and that although the land in question need not be physically enclosed, it at least needs to be regarded in law as part of one enclosure with the house. It was also held, however, that there must be an 'intimate association' with land which is undoubtedly within the curtilage in order to make the land under consideration part and parcel of that undoubted curtilage. This intimate association 'test' stems from the requirement in **Sinclair-Lockhart's Trustees v Central Land Board (1950) 1 P&CR 195** that curtilage should be the "ground which is used for the comfortable enjoyment of a house or building, and that the land must serve the purpose of the house or building in some necessary or useful way".

4.19 As can be seen from the aerial photograph below, the land outlined in red on the submitted plan is that which is clearly being used for the "comfortable enjoyment" of the owners of Wild Thorn Farmhouse. This contains the dwelling, outbuildings, driveways, parking areas and lawns. All of this land has an intimate association with the dwelling, and is used by its occupiers in a beneficial way for purposes incidental to the enjoyment of their dwellinghouse.

Photograph 2: Aerial Photograph © Google Earth

Will the Replacement Caravan be used for Ancillary Purposes?

4.20 With respect to the proposed **use of the land**, the application property (Wild Thorn Farmhouse) is occupied by the applicant, Cara Tissandier, her brother Ryan Tissandier and her partner, Christopher Smith. The replacement caravan will be for the use of Ryan Tissandier, who will use it to sleep in, and as an office. All three of the residents (the applicant, her

partner and her brother) are co-owners and workers in the farming enterprise, and will occupy the site as a single 'family unit'.

4.21 There is absolutely no intention that the caravan will be made available for separate, independent, residential use; the water, gas and electricity supplies will all be shared with the main property, as will the existing drainage system. The caravan will not have its own utility metres or postal address and all bills will be sent to Wild Thorn Farm. The provision of all meals will be shared, as will laundry facilities, storage of domestic items, housekeeping etc. The caravan will also not be registered a separate unit of occupation, with respect to the payment of Council Tax.

4.22 Whilst the caravan might therefore be seen as being *capable* of independent occupation, this is not the basis upon which a Certificate is being sought. There will be no physical or functional separation of land, and no separate planning unit will be created.

4.23 On the basis that:

a) There has been an ancillary residential caravan sited within the curtilage of Wild Thorn Farmhouse for 18+ years; and
b) At all times the occupation of the proposed replacement caravan will remain ancillary to the primary residential use of the land;

no **material change of use** of land requiring planning permission will take place.

Submitted Evidence

4.25 In order to support this line of argument the following documents are submitted alongside the current application:

Document 1 – Transcript of House of Commons Debate (22 November 2005)

4.26 This debate, in part, concerned the stationing of caravans belonging to gypsies and travellers within the curtilages of the residential properties that they had purchased. Reference (on page 3) is made to paragraph 29 of former Circular 01/94 (subsequently replaced by Circular 01/06) which stated:

> *"Some kinds of activity will not fall within the definition of 'development' in Section 55 of the 1990 Act, and will not therefore*

require planning permission. Any gypsy living in a dwellinghouse will not require planning permission to use a caravan within the curtilage of the dwellinghouse, provided that the purpose is incidental to the enjoyment of the dwellinghouse as such. A caravan within the curtilage of a dwellinghouse may have a number of ancillary uses for which planning permission would not be required. For example, it could be used for ***additional living accommodation****, provided that it remained part of the same planning unit as the dwellinghouse and the unit remained in single family occupation*."

4.27 On page 6 of the transcript, in response to the question, "to what extent would the usage of a caravan fall outside the definition of being incidental to enjoyment of the dwelling house", it was stated that:

> "*A caravan is not a building. Stationing one on land is not itself 'operational development' that requires planning permission, although associated works such as the provision of infrastructure and hygiene facilities may well be. Under planning law, householders can park caravans in their gardens or driveways indefinitely, provided that no material change of use of land occurs. However, in certain circumstances, the placing of a caravan on land may change the principal use of that land, which would amount to development in the form of a material change of use of land. It is for that reason that the use of land for an occupied caravan generally requires planning permission. The hon. Lady asked whether adding extra caravans would still be incidental.* ***A householder is entitled to use caravans as extra accommodation without planning permission****, provided that the occupants continue to use the house, for example, the kitchen or bathroom. If, on the other hand, a caravan is there for another purpose not incidental to the enjoyment of the main dwelling, known as the dwelling house - for example, it is inhabited quite separately from, and independently of, the dwelling house - planning permission for change of use of the land would, generally speaking, be required. As it would result in the creation of a new planning unit, such permission may well not be granted in a residential area*."

4.28 At a later point in the transcript (on page 8) it is confirmed that examples of ancillary uses could include uses such as storage, home office, **additional sleeping accommodation** and a garden shed. The original transcript can be found at:

http://www.publications.parliament.uk/pa/cm200506/cmhansrd/vo051122/debtext/51122-39.htm

Documents 2 and 3 – Homefield Appeal Decision and Costs Decision (12 November 2009)

4.29 This appeal concerned a Lawful Development Certificate application to site two caravans on land within a residential curtilage, for use as ancillary accommodation incidental and subordinate to the residential occupation of the main dwellinghouse. In allowing an appeal against the refusal, by West Lancashire Council, to issue a Certificate, the appointed Inspector concluded that:

> "*The evidence for the appellants is that the caravans would be used by the two sons to provide their sleeping accommodation, "and for social purposes and entertaining friends". The supporting statement goes on to say that "the sons will, as now, take all meals in the main house, use laundry facilities and generally inter-react with their parents in the normal manner associated with family occupancy." As such, I consider the proposal is to use the caravans solely as living accommodation additional to that which exists at Homefield. The stated intention is that the caravans will not be used as independent units of accommodation, but will remain very much part and parcel of the main dwelling. If the caravans were to be used as self-contained living accommodation, then it is likely that would amount to a material change of use of the land. But, so long as the caravans are sited within the residential planning unit, and so long as use of the caravans remains ancillary to the main dwelling, I am satisfied their siting does not result in any material change of use of the land*."

4.30 In parallel to submitting their appeal against the refusal to issue a Lawful Development Certificate, the appellants made an application for an award or costs on the grounds that the Council had acted unreasonably. In making a full award in favour of the appellants the appointed Inspector found that by considering the proposal primarily in the context set by the 2008 [General Permitted Development] Order the Council failed to first address whether or not the siting of 2 caravans amounted to development.

Document 4 – 80 Buckingham Road Appeal Decision (19 February 2016)

4.31 In this decision the appointed Inspector noted that whilst the proposed

caravan would have contained all the facilities for independent living it would not have been used in that way. There would have been a functional link with the main dwelling. The use of the caravan in the manner described in the application would have been a use comprised part and parcel within the primary dwellinghouse use which was already taking place within the planning unit, as a matter of fact and degree. For this (and other) reasons it was found that, had the caravan been sited and its use instigated at the time of the LDC application, there would not have been a breach of planning control. The siting and use of the caravan for the purpose of providing additional living accommodation as described in the application would have been lawful as a matter of fact and degree.

Document 5 – Woodfords, Shipley Road Appeal Decision (20 Sept 2016)

4.32 In this very recent decision, which also concerned the siting of a caravan for occupation by elderly parents, within the garden grounds of a dwelling, the appointed Inspector concluded:

> "*Use of the caravan in the way set out in the supporting statement would not, in my view, result in a separate unit of occupation, in planning terms, and the use of the existing planning unit comprising the house at Woodfords and its grounds would remain in domestic residential use as a single dwellinghouse. The character of the use would not change.*
>
> *Whilst I can appreciate the concerns of the Council, the size of the caravan and the facilities provided, which would be found in most large caravans, do not cast substantial doubt on the applicant's explanation of the use that is proposed. On the balance of probabilities I consider that that use proposed would be subordinate and ancillary to the use of the property as a single dwellinghouse. It would not result in a material change of use. For that reason I conclude, on the evidence now available, that the Council's refusal to grant an LDC in respect of the siting of a caravan for ancillary residential use within the residential curtilage of Woodfords was not well-founded and that the appeal should succeed. I will exercise accordingly the powers transferred to me under s195(2) of the Act*."

Document 6 – Sandy Holt Appeal Decision (8 April 2013)

4.33 This decision concerned the siting of staff accommodation with the

curtilage of a dwellinghouse. The 'mobile home' in question was to provide staff accommodation for persons employed on the site as a chauffeur/ handyman and or housekeeper with duties which require the staff to be available at various times of the day and evening. Duties would include chauffeuring, maintaining the family vehicles, maintaining the property itself, overseeing other staff, looking after the pool, providing day-to-day domestic support including cleaning and laundry and assistance in the kitchen. The occupiers of the mobile home would continue with their duties in the house when the family were away and would provide an on-site presence for security purposes.

4.34 Here, the appointed Inspector noted that the whole of the appeal site would remain under one ownership and control, and that there would be no functional separation of the main dwelling house use from the mobile home use. The siting of the mobile home would not, therefore, lead to the creation of a new planning unit. Given the clear functional link between the mobile home and the dwelling, and the ancillary and subordinate nature of the accommodation to be provided, she therefore concluded that the siting of a mobile home for the purposes described would not amount to a material change of use.

Document 7 - Waterworks Cottage Appeal Decision (23 November 2011)

4.35 This final case concerned the 'permanence' of a 'mobile home', which was to be placed on padstones and would have been likely to have been attached to services such as water, drainage and electricity (although the precise services were not specified in the application). The appointed Inspector was of the opinion that attachment to services was not the same as physical attachment to the land, as they could easily be disconnected in the event that the mobile home needed to be moved. The placing of the mobile home on padstones, or any other sound and firm surface, was also not, in itself, a building operation as suggested by the Council, notwithstanding that a degree of skill is required in such placement. The Inspector found no support in legislation or case law for such a proposition and concluded that the Council were incorrect in their interpretation of the permanence of the mobile home as an indication of operational development rather than a use of the land.

4.36 All of the above appeal decisions conclusively demonstrate that the siting of a caravan, to be used for ancillary purposes, is not to be regarded as operational development, and does not bring about a **material change of use** of the land. Whether or not the caravan is capable of independent occupation is of no relevance; the assessment of whether

development is involved can only be made on the basis of how the caravan in question will actually be used.

4.37 In order provide further support for the current application reference is also made to the following two appeal decisions, each of which relates to the siting of caravans with the grounds of hotels, for use as ancillary accommodation.

4.38 In the first of these the Yorkshire Dales National Park Authority refused to issue a Lawful Development Certificate for the use of a walled garden, within the grounds of a hotel, for the siting of four guest caravans (PINS reference APP/C9499/X/08/2084644). Each caravan was to be used as overnight sleeping accommodation for guests of the hotel. In allowing the appeal the appointed Inspector found that:

> "*The use of the walled garden in the manner proposed would not, of itself, create a new planning unit;* ***there would be no material change of use of the land****. For the reasons given above, and having regard to all other matters raised, I conclude that the Authority's refusal to grant a Certificate of Lawful Use or Development was not well founded and that the appeal should succeed*."

4.39 In the second, the Lake District National Park Authority refused to issue a Lawful Development Certificate for the siting of an additional staff caravan within the grounds of an established hotel (PINS reference APP/Q9495/X/08/2090411). In an almost identical decision to the above the appointed inspector concluded that:

> "*The provision within the planning unit of a hotel in a rural location of facilities for accommodating staff employed in the running of the hotel is capable of being ancillary to the main use. Their provision in the form of a caravan at the site, as a use of land rather than operational development,* ***could fall within the principle of one ancillary to the hotel use where not providing independent living units****. This was established by the* Restormel *judgement*."

4.40 **Restormel Borough Council v Secretary of State for the Environment and Rabey [1992]** concerned the siting of a staff caravan within the grounds of the Norbury Sands Hotel in Newquay. An Enforcement Notice had been served alleging that there had been a material change of use of land, to a use for the purpose of stationing a caravan. The caravan in question was being used as ancillary dormitory accommodation for two waitresses.

In his judgement Forbes J came quite firmly to the view that:

> "… *you had to look at the planning unit; you had to look at the use to which that planning unit was being put, and if there was a caravan stationed there, then the Inspector was right in saying that if the use to which the caravan was being put was in fact a use which did not amount to a material change of use, then there was no breach of planning control. It was inappropriate when a caravan was stationed on land for a particular purpose, to look at the stationing of the caravan separately and say that that was something which was development requiring planning permission because it made a material change of use*."

4.41 He thus did not believe you could decide whether the material change of use had been made until you knew the purpose for which the caravan was to be used, and **whether that purpose fitted in with the existing use of the land**".

4.42 Finally, whilst not in respect of the siting of a caravan, reference is also made to **Uttlesford District Council v Secretary of State for the Environment & White [1991]**, one of the leading cases in respect of the use of an existing building within the curtilage of a dwellinghouse, for the provision of ancillary residential accommodation. Here it was concluded by Mr Lionel Read QC (sitting as a deputy judge of the Queen's Bench Division) that a building within the garden of a property could similarly be used as an integral part of the main residential use, without this representing a breach of planning control (i.e. a material change of use). As he noted in his judgement:

> "… *the Department's present view is that the use of an existing building in the garden of a dwelling-house for the* ***provision of additional bedroom accommodation*** *… merely constitutes an integral part of the main use of the planning unit as a single dwelling-house and, provided that the planning unit remains in single family occupation,* ***does not therefore involve any material change of use of the land***."

4.43 Although the proposed caravan could contain the facilities required for independent living, there will be sufficient linkage between its occupant, and the occupants of the main dwelling, for the two to remain a single planning unit. As was observed in *Uttlesford*:

"*… the elderly relative to be accommodated would have her own bedroom, bathroom and, I assume, lavatory, small kitchen, somewhere to sit and her own front door. To that extent she will be independent from the rest of the family*. ***I find no reason in law why such accommodation should consequently become a separate planning unit from the main dwelling***."

c) Conclusion

4.1 To summarise, the key elements of the current submission are as follows:

- There has been an ancillary residential caravan sited within the curtilage of Wild Thorn Farmhouse for 18+ years;
- The additional accommodation to be provided would be within a **caravan** as defined in the 1960 Caravan Sites Act (as amended);
- The replacement caravan would be sited within the residential curtilage of the existing dwelling;
- It would be when sited, and will thereafter remain, a **movable structure**;
- It would not be permanently affixed to the ground and no operational development would take place; only services would be connected;
- The use of the caravan would at all times be **ancillary** to the use of the planning unit that is Wild Thorn Farmhouse;
- The occupier of the caravan has a close family link with the occupiers of the main dwelling, and the provision of main meals, laundry facilities, domestic storage etc. would be shared with the occupiers of the main dwelling;
- The caravan will not be provided with a separate curtilage; and
- The caravan would not have a separate postal address, it would share the existing dwelling's utility services, and it will not be registered a separate unit of occupation with respect to the payment of Council Tax.

For these reasons, and having regard to the submitted evidence, it is clear that there would be **no material change in the use** of the planning unit, and thus **no development** as defined by Section 55(1) of the Town and Country Planning Act 1990 would take place. A **Certificate of Lawfulness of Proposed Use or Development**, under the provisions of Section 192 of the 1990 Act, should therefore be able to be timeously issued.

APPENDIX 1

Aerial Photographs of Wild Thorn Farm

Photograph 3: Photograph taken in 2003

Photograph 4: Photograph taken in 2006

Photograph 5: Photograph taken in 2016