



Appeal Decision

Inquiry held on 16 to 18 April 2024

No site visit made

by M Madge Dip TP MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 30/05/2024

Appeal Ref: APP/F3545/X/23/3334323

**Land at the Former Animal Health Trust Research Centre, Kentford
CB8 7UA**

- The appeal is made under section 195 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant a certificate of lawful use or development (LDC).
 - The appeal is made by Lochailort Kentford Ltd against the decision of West Suffolk Council.
 - The application ref DC/23/1319, dated 10 August 2023, was refused by notice dated 13 October 2023.
 - 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 use of the land for Class E purposes.
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Preliminary Matters

1. The Jockey Club (TJC), acting on behalf of the horse racing industry (HRI), was granted Rule 6 status. While written submissions were made and they had legal representation at the Inquiry, no witnesses were called to further their case. Their written submissions were not tested and will therefore carry less weight.
2. A pre-inquiry site visit took place on Monday 15 April 2024. Representatives for the rule 6 party were unavailable to attend and I was accompanied by representatives for the appellant and the Council. The purpose of the site visit was to familiarise myself with the layout of the site and the buildings with a view to furthering my understanding of how they had been used by the Animal Health Trust (AHT).
3. The inquiry sat for 3 days. Factual evidence was given under affirmation.
4. Lanwades Hall, its associated gate lodges (East Lodge and West Lodge) and its wall garden are Grade II listed buildings. They formed part of the AHT's land holding until 2016 when they were sold. The former visitor's centre is also a Grade II Listed Building. This building was the former stables to Lanwades Hall. There is no statutory requirement for me to have regard to the heritage asset status of these buildings in the formulation of my decision.

Background

5. The appeal site is located at the former Animal Health Trust Research Centre, which is approximately 120 acres in size and located on the western periphery

of the village of Kentford. It is a matter of common ground that there are 32 buildings located within the site¹.

6. The existing buildings have been used for a variety of purposes including laboratories, a Centre for Small Animal Studies (CSAS), a Centre for Equine Studies (CES), Cancer Therapy Centre, MRI and x-ray buildings, a visitors' centre, intern accommodation building, offices, a hydrotherapy unit, and associated stables, kennels and barns. There is an extensive planning history relating to the site², and there is no dispute that the existing buildings are lawful.
7. The AHT ceased its activities on the site in 2020 and the site has subsequently lain vacant. It is a matter of common ground that there has been no intervening use of the land between the AHT's closure and the date the LDC application was made.

Reasons

8. The **main issue** is whether the Council's refusal to grant a lawful development certificate for the existing use of land for Class E purposes was well founded. This turns on whether the appellant can show that the use of the appeal site for Class E purposes was lawful on the date of the application. As the matter relates to a use of land, the relevant period is 10 years, and the material date is therefore 10 August 2013. Any continuous 10-year period is relevant. An LDC appeal must be considered solely based on fact and law, and irrespective of planning merits.
9. The onus of proof is on the appellant to show, on the balance of probability, that the use for Class E purposes began on or before the material date. The use also must have been continued without significant interruption for 10 years. Bearing in mind that AHT did not operate for approximately 3 years preceding the date of the LDC application, it would have to be shown that the AHT had operated from or before 10 August 2010 for the use to have endured for a relevant 10-year period.
10. Section 191(5)(b) of the 1990 Act requires that, if a lawful development certificate is granted, it shall include a description of the use in question and where any use falls within a specified use class, that use class shall be referenced. Further, the planning practice guidance (PPG) clarifies that an application needs to describe precisely what is being applied for and not simply the use class.
11. The application form³ only describes the existing use as falling within Use Class E. The section of the form requiring a full description of each existing use for which the certificate is being requested directs the reader to 'see covering letter'. While the Council's refusal of the certificate describes the existing use as 'a use falling within Use Class E', we know from the PPG that such a description is insufficiently precise. Furthermore, Use Class E (Commercial, Business and Service) is wide ranging.

¹ Statement of Common Ground Addendum March 2024

² CD1.18

³ CD1.2

12. The purpose of the certificate was discussed at the Inquiry. Paragraph 13 of the covering letter⁴ refers to the primary use of the site as being 'a research centre with associated veterinary/clinical practices, and education activities (Use Class E)'. When asked if this provided a sufficiently precise description of the use being applied for, the parties indicated that 'research centre' is too broad a term, therefore requiring further precision. It was also agreed that there is no need for the use for which a certificate is being sought to include associated, ancillary or incidental uses. The parties did not agree a form of wording, instead leaving it to me to decide, based upon the evidence heard. I shall return to this point in due course.

The Planning Unit

13. Where what use land and buildings have been put to is being considered, it is first necessary to determine whether there is a single planning unit or multiple planning units. In *Burdle*⁵ it was held that the planning unit is usually the unit of occupation, unless a smaller area can be identified which, as a matter of fact and degree, is physically separate and distinct, and occupied for different and unrelated purposes. The concept of physical and functional separation is key, and Bridge J suggested 3 broad categories of distinction:

- i. Where it is possible to recognise a single main purpose of the occupier's use of his land to which activities are incidental or ancillary, the whole unit of occupation should be considered the planning unit.
- ii. 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, the entire unit of occupation should be considered the planning unit, in mixed use.
- iii. Where there are 2 or more physically separate and distinct uses, occupied as a single unit but for substantially different and unrelated purposes, each area used for a different main purpose (together with its incidental and ancillary activities) ought to be considered a separate planning unit.

14. The AHT own and occupied all the land and buildings. While there are fences and hedgerows present, they constitute landscaping features within the site rather than providing physical barriers between activities being undertaken. Some buildings were used for specific purposes, but those purposes formed part of a larger overarching purpose. For example, the hydrotherapy building was used amongst other things for the rehabilitation of dogs following treatment in the CSAS, staff employed throughout the site would take meals at the café in the visitor centre, and research findings and practices would be disseminated through the operation of continuing professional development (CPD) lectures and courses held in meeting rooms located in various buildings across the site.

15. We heard from Toni-Ann Hammond and Heather Ewence that while specific types of research, development and clinical activities took place in specific buildings, employees, visitors and animals would move around the site and between buildings. They also told us how research conducted would be put into practice within the CSAS and the CES and other buildings. Demonstrating functional connectivity between the activities undertaken.

⁴ CD1.5

⁵ *Burdle v Secretary of State for the Environment* [1972] 1 WLR 1207 (Div Court)

16. The unit of occupation is therefore the whole appeal site. While the Council initially argued that there was no need to determine the extent of the planning unit, having heard the evidence of the appellant's witnesses, they conceded that there is a single planning unit. For the reasons given above, I concur.
17. The matters in dispute are whether this single planning unit was used for a single primary use or a mixed use comprising of two or more primary uses and whether that single or composite use falls within the definition of Class E of the Town and Country Planning (Use Classes) Order 1987 (as amended) (the UCO).

Case for the appellant

18. It is the appellant's case that all the AHT's activities fell within the single primary use of research and development of products and processes, a use that now falls within Class E (g) (ii) of the UCO. The clinical services and professional education for those working, and interested in, the field of animal health are claimed to be ancillary uses.
19. In the alternative, the appellant argues, if I find that clinical services are also a primary use, then it too falls in Class E. They maintain the professional education activity is an ancillary use.

Case for the Council

20. The Council contends the clinical services do not fall within Class E(e) as the medical and health services were not provided principally to visiting members of the public. They also contend the scientific research was pure research and did not lead to the development of products or processes as required by Class E(g)(ii). Furthermore, they argue the employment of interns and regular provision of CPD courses are a primary education use. It is the Council's case therefore that the activities of the AHT fell into 3 distinct primary uses, clinical activities, scientific research, and education, amounting to a mixed use.

Case for the Rule 6 Party

21. TJC has a long-standing commitment to Newmarket in terms of horse training, racing and breeding. They argue that a strong Newmarket is critical to the sustainability of British horse racing. TJC act as agent for the HRI in certain town planning issues to promote and protect the long-term sustainability of the HRI in and around Newmarket. TJC claim that development pressure in and around Newmarket is slowly eroding the scope to operate this complex industry. Development pressure is not however a matter before me for consideration.
22. TJC claim, since the AHT was established in 1946, it has been intertwined with Newmarket's horse breeding and racing cluster. TJC claim the AHT has benefitted from funding provided by patrons for the betterment of treatment for horses; notably the AHT began due to the gifting of Lady Yule's Newmarket stable in 1946 to serve as the country's first Equine Research Station⁶. Due to the distinctly equine character, function and purpose of the AHT activities, TJC contend that they do not fall within Class E(g), E(c) or E(e). Instead, TJC argue AHT is part of the Newmarket Equine Cluster, a globally unique horse breeding and racing cluster recognised in local planning policy terms.

⁶ CD1.17 A history of the Animal Health Trust by Richard Onslow

Whether this single planning unit was used for a single primary use or a mixed use comprising of two or more uses

23. The AHT's mission statement states "our approach is to develop new technology and knowledge for the better diagnosis, prevention and cure of disease; to provide a clinical referral service for veterinary surgeons in practice; to promote postgraduate education and to communicate our findings to others." Paragraphs 5.11 to 5.22 of the SoCG⁷ set out and provide lists of the research, clinical and educational uses that have occurred on the appeal site since 1942 to 2017. I shall take these as a summary of the activities undertaken by the AHT.

Horse racing industry use/Newmarket Equine Cluster

24. From the list of agreed activities, I see nothing to suggest that the AHT were more closely linked to horse breeding and racing than to any other small animal breeding and associated activities. The AHT may well have received funding and donations from sources actively involved with horse breeding and racing, but funding sources do not necessarily correlate to the primary activities being carried out. I acknowledge the AHT has been directly responsible for the development and production of equine vaccines and equine therapies, amongst other equine matters. However, this does not necessarily mean they are part of the Newmarket Equine Cluster or an integral part of the HRI. Even if it did, referring to the 'Newmarket Equine Cluster' and 'HRI' is no different to referring to the car manufacturing industry or suggesting there is a West Midlands/Birmingham Car Manufacturing Cluster. These are nothing more than labels applied, in this instance, for planning policy purposes. It would have no bearing on the primary activities to which the appeal site is put.

Research and development of products or processes

25. It is a matter of common ground that research and development of products and processes occurred on some level as part of the AHT's activities. This was confirmed by Toni-Anne Hammond, who gave examples of research projects and their outputs; including developing and producing a duck hepatitis vaccine, successive forms of equine herpes virus vaccines and influenza virus vaccines updated to respond to changing mutations of the viruses, a PCR test for strangles, a PCR test to detect viral and bacterial nucleic acid, ELIZA⁸ tests for equine viral arteritis and for antigens to equine influenza, genetic testing (all canine genetic testing currently used worldwide was developed at the AHT facilities), and therapies for sport horses exposed to high humidity. Heather Ewence went on to explain research projects and outputs involving the Welsh mountain ponies for which she was responsible. Further snapshots of the research and development achievements are found in the various Trustees Reports, in particular those found in CD1.60 to 1.62.

26. Research carried out by the AHT resulted in and contributed to the development and refinement of vaccines, drugs, therapies, treatments and new means of animal breeding, handling and husbandry. The appeal parties acknowledge that some research projects resulted in the advancement of knowledge rather than the production of a vaccine, drug, test or new technique in animal welfare. In such cases, research papers would be published in

⁷ Statement of Common Ground February 2024 Pages 10 - 12

⁸ Enzyme-linked immunosorbent assay (ELIZA)

professional journals. The Trustee Reports confirm the volume of research papers and other publications produced. The research set out in these publications would no doubt contribute to the furtherance of understanding in the wider scientific community. I find these research papers therefore to be a product resulting from research undertaken by the AHT.

27. In addition to the outputs identified above, the Trustee Reports and witness evidence confirm that some staff were employed purely for research and development purposes. Furthermore, some of the 32 buildings were also used primarily for research and development purposes, such as the laboratories and the Allen Centre. A significant proportion of the AHT's expenditure and income related to research and development activities.

Clinical Services

28. I heard how the clinical activities were generally carried out by clinicians, scientists and other staff who were engaged in research and development projects being undertaken by the AHT as well as the implementation of those treatments and therapies. Animals treated within the CSAS and CES did so, primarily, on a referral basis from their own veterinarian. The treatment of these animals is identified as an essential element of furthering the AHT's knowledge about disease and injury. The knowledge gleaned was then applied to improving diagnosis, prevention and treatment of infections, non-infectious and inherited diseases.
29. Animals attending and being treated at the CSAS and the CES were not however sought out specifically to take part in research and development projects. While their attendance and treatment did, no doubt, contribute to advancement of the AHT's processes, treatments and therapies, the purpose of their attendance was to be treated to improve their own health and welfare.
30. In addition, the Trustee Reports and witness evidence confirm that some staff were employed purely for veterinary purposes. Furthermore, buildings such as the hydrotherapy building, MRI barn, kennels and some stables were used primarily in connection with clinical services. A greater proportion of the AHT's expenditure and income related to clinical services.

Education

31. There is no suggestion that the appeal site is an educational institution such as a school, college or university. Further, it is agreed between the appellant and Council that educational and training activities take the form of (a) dissemination by AHT staff of research and the outputs of research to other professionals in the animal health field, including dog breeders to a limited extent, continual professional development (CPD), and (b) the placement with AHT of interns and post-graduate students.
32. It is common ground that the CPD sessions amounted to approximately 22 over the course of a year. Sessions were either day or evening events and catered for in-house training, and research and best practice sharing. Dr Mellersh's statutory declaration states that the dissemination of information to dog breeders arising from her genetic research team occurred 3 to 4 times per year. Interns and PHD students amounted to approximately 5% of the total workforce. In addition, it is agreed that AHT staff published 144 papers, e-pubs

and conference abstracts in 2017. This figure is comparative with figures in other years.

33. It is common ground that the lecture theatre, located in the Visitor Centre, was use for educational purposes only. No staff are employed solely for educational purposes. The interns and PHD students had full time jobs with the AHT, which facilitated their on-going education. A small proportion of the AHT's expenditure and income related to education.

Primary and/or Ancillary use(s)

34. The primary use of land or a building is, as the term implies, the main use or activity that is carried out by the occupier. The essential characteristic of an ancillary use is that there should be some ordinarily functional relationship between it and the primary use. The SoCG, at paragraph 5.8, confirms that the appellant and Council's agree with this approach. The courts have also held that size or scale of a use is not necessarily determinative as to whether a use is ancillary.
35. Much was made of the staffing levels, proportion of buildings used and income and expenditure on specific areas of the business. However, these are not determinative in the identification of the primary use of the appeal site.
36. The main purpose of the AHT was the development of technologies and knowledge to better diagnose, prevent, and cure animal diseases. The list of products and processes set out in 5.12 to 5.15 of the SoCG shows that this was a fundamental activity of the AHT. Having regard to Section 191(5)(b) of the 1990 Act, I therefore find that the research and development of animal health and welfare products and processes was a primary use.
37. The evidence shows operational links between the research and development of animal health and welfare products and processes and the clinical services in terms of the staff undertaking the work and the advancement in treatments and therapies. However, animals being treated in the CSAS and the CES were primarily brought to the facility for treatment by their owners, as opposed to taking part in specific research projects. The products and processes developed by the AHT could be administered to animals elsewhere by other animal healthcare professionals. The provision of specialist veterinary services by the AHT does not therefore, in my judgement, have an ordinarily functional relationship with the research and development of animal welfare products and processes. Having regard to Section 191(5)(b) of the 1990 Act, I therefore find that clinical services comprising of animal health and medical services was a primary use.
38. Turning to the educational activities, the agreed activities were carried out as a direct result of the two primary activities. CPD is a fundamental part of any business, particularly in one where a key component is to develop new technology and knowledge for better diagnosis, prevention and cure of disease, and the promotion of treatments and therapies to improve animal health and welfare. The educational activities would not have occurred independently of the two primary activities. Educational activities are therefore, in my judgement, an ancillary use.

39. The Trustee Reports also show that there has been no significant change to the intensity of each of the component uses between 2010 and 2020, which I take to be the relevant 10-year period.
40. For these reasons, I find that the clinical services were not ancillary to the research and development of animal health and welfare products and processes. The education activities were however ancillary to both those primary uses.
41. Having identified there are two primary uses, it is necessary to determine whether they fell within none, one or more defined use Class.

The Town and Country Planning (Use Classes) Order 1987 (as amended) and Use Class E: Commercial, Business and Service

42. The UCO specifies different Classes of use for the purposes of paragraph (f) of s55(2) of the 1990 Act, so that a change of use within the same use Class is not to be taken to involve development of land. Its effect is to specify that a change of use from an old use to a new use, which both fall within the same Class is not development. The concept of the UCO requires that it be applied to a single definable use of land or building and not a composite use, unless there is a single dominant use and others are ancillary uses.
43. Class E is wide ranging and encompasses uses that previously fell into several different Classes such as shops, financial services, business, indoor sports, etc. Class E also provides that "use, or part use" for any of those purposes falls within the Class. The PPG specifies that Class E provides for use, or part use, for all or any of the purposes set out in the Class⁹. Movement from one primary use to another within the same use class is not development.
44. Where primary uses fall out with a use class or comprise more than one primary use falling within different use classes, they are *sui generis* uses. While a mixed use would normally be a *sui generis* use, the introduction of Class E now means that uses that have significantly different characteristics could fall within a single use Class and would no longer form a mixed or *sui generis* use.
45. While some of the research activities carried out by the AHT may not have led to the development of products and/or processes by them, that was not their fundamental aim. Furthermore, the publication of their research would have contributed to others developing products and processes. As a matter of fact and degree, I find that the research and development of animal health and welfare products and processes, including research papers, fall within use Class E(g)(ii).
46. Clinical services comprising of animal health and medical services would generally be considered veterinary services, and this is not specified in any use Class. Use Class E(e) is however 'for the provision of medical or health services, principally to visiting members of the public'. It is not disputed that the AHT provided medical and health services. Key to determining whether the AHT's clinical service fall within Class E(e) is what is meant by 'principally to visiting members of the public'.
47. The Council contend that, 'principally to visiting members of the public', means that the services are provided mainly to members of the public who can and do

⁹ PPG paragraph: 12 Reference ID: 13-012-20140306

walk in off the street without restriction. They directed me to various legal authorities.

48. In *Karla v SSE* (1996) 72 P&CR 423 the Court of Appeal considered whether a solicitors office fell within Class A2 (which included the provision of professional services to visiting members of the public) or Class B1 (which included use as an office other than an A2 use). The Inspector had rejected the appeal partly on the basis that a solicitors' office would not be 'appropriate to provide in a shopping centre'. The court held this was an error in law as the requirement that a service be appropriate in a shopping area only applied to Class A2(c): other services. It did not apply to financial and professional services, where the test was providing services principally to visiting members of the public. It was found that the use of an appointments system did not necessarily mean that services are not provided to visiting members of the public.
49. In *R v Thurrock Borough Council, ex parte Costco* 1993 WL 964266 (1993), planning permission for a 'warehouse club for the sale of goods was challenged on the ground that it was effectively an A1 retail use, which was contrary to policy. The warehouse club was open only to members, who had paid a subscription and were either a 'Business Member' or a 'Private Member'. Schiemann J held this meant it was not an A1 retail use as 'if there is a restriction on those who can come and buy then the premises are not prima facie properly described as being used for the sale of goods to visiting members of the public and in consequence do not fall within Class A1 of the order...'.
50. In *R v LB Kensington and Chelsea, ex p Europa Foods Ltd* 1996 WL 1090308 (1996) a similar question to *Thurrock* arose but this time in relation to whether the use of auction rooms was within Class A1, and whether sales in an auction room were to 'visiting members of the public'. Macpherson J held that they were within Class A1 as there were no restrictions upon visiting members of the public, as in *Thurrock*.
51. The AHT did not provide a general veterinary practice, where people might walk in off the street to have their animals treated. There is no dispute that the services offered by the AHT were specialist services, where people brought their animals to be treated on a referral basis. This is no different than people attending a specialist health clinic following referral by their general practitioner. All it means is that people would attend on an appointment basis, which having regard to *Kalra*, does not necessarily mean that attendees are not 'visiting members of the public'. There was no requirement for people bringing their animals for treatment to pay a subscription or to be a member, as in *Thurrock*. I therefore find that the people bringing their animals for treatment were 'visiting members of the public'.
52. I acknowledge that the clinical services offered by the AHT included commercial diagnostic services. I heard that while most samples were supplied by post, some were delivered by owners. However, Class E(e) requires the provision of services **principally** to visiting members of the public [my emphasis], which means that not all services have to be provided to visiting members of the public. Given the amount of accommodation given over to the physical treatment of animals it would be reasonable to conclude this was a primary element of the clinical services on offer. I therefore find that the AHT's clinical services comprising of animal health and medical services fall within Class E(e)

for the provision of medical and health services, principally to visiting members of the public.

53. The appeal site is a single planning unit and both primary uses fall within Class E. As provided for in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020/757, where a planning unit is used for multiple primary uses falling within Class E, the whole planning unit is in a single use for Class E purposes.

Relevant period

54. The AHT has operated since the late 1940's. The planning history shows that, with the exception of the office staff building and intern accommodation building¹⁰, all buildings were erected before the late 2000's. From this it is reasonable to conclude that the two primary uses have been carried out for at least 20 years, if not longer, without significant interruption.

Conclusion

55. For the reasons given above I conclude, on the evidence now available, that the Council's refusal to grant an LDC in respect of the use of land for the purposes of research and development of animal health and welfare products and processes and for clinical services, comprising of animal health and medical services (Class E) was not well-founded and that the appeal should succeed. I will exercise the powers transferred to me under section 195(2) of the 1990 Act (as amended).

Formal Decision

56. The appeal is allowed and attached to this decision is a certificate of lawful use or development describing the existing use which is found to be lawful.

M Madge

INSPECTOR

¹⁰ DC/16/2361/FUL

Lawful Development Certificate

TOWN AND COUNTRY PLANNING ACT 1990: SECTION 191
(as amended by Section 10 of the Planning and Compensation Act 1991)

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND)
ORDER 2015: ARTICLE 39

IT IS HEREBY CERTIFIED that on 14 August 2023 the use described in the First Schedule hereto in respect of the land specified in the Second Schedule hereto and edged and hatched in black on the plan attached to this certificate, was lawful within the meaning of section 191(2) of the Town and Country Planning Act 1990 (as amended), for the following reason:

The appellant has shown, on the balance of probability, the appeal site has been used for the purposes of research and development of animal health and welfare products and processes and for clinical services, comprising of animal health and medical services (Class E), without significant interruption for more than 10 years. No enforcement action may be taken because the time for taking enforcement action has expired.

Signed

M Madge

Inspector

Date: [30/05/2024]

Reference: APP/F3545/X/23/3334323

First Schedule

The use of land for the purposes of research and development of animal health and welfare products and processes and for animal health and medical services (Class E).

Second Schedule

Land at Land at the Former Animal Health Trust Research Centre, Kentford,
CB8 7UA

IMPORTANT NOTES – SEE OVER

NOTES

This certificate is issued solely for the purpose of Section 191 of the Town and Country Planning Act 1990 (as amended).

It certifies that the use /operations described in the First Schedule taking place on the land specified in the Second Schedule was /were lawful, on the certified date and, thus, was /were not liable to enforcement action, under section 172 of the 1990 Act, on that date.

This certificate applies only to the extent of the use /operations described in the First Schedule and to the land specified in the Second Schedule and identified on the attached plan. Any use /operation which is materially different from that described, or which relates to any other land, may result in a breach of planning control which is liable to enforcement action by the local planning authority.

Plan

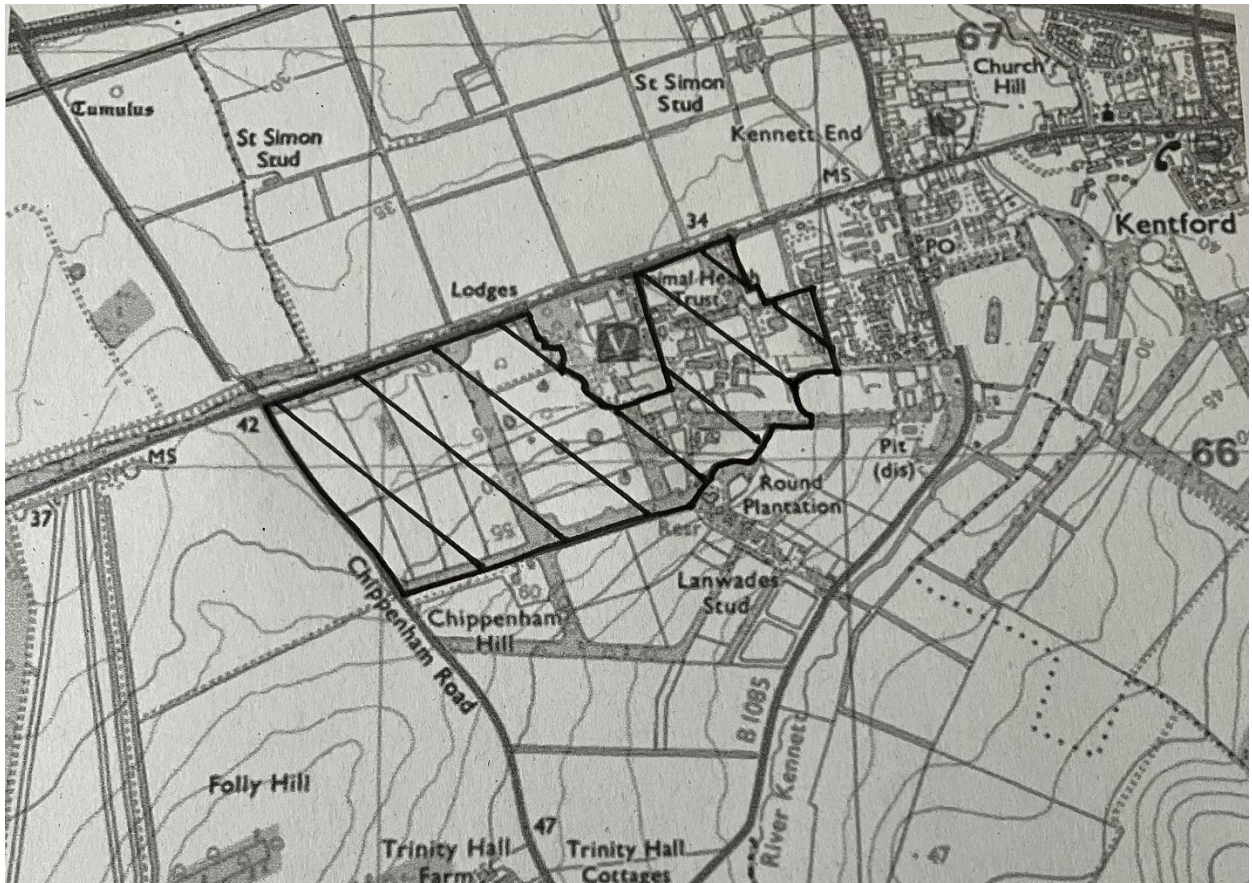
This is the plan referred to in the Lawful Development Certificate dated: [30/05/2024]

by M Madge Dip TP MA MRTPI

Land at: Land at the Former Animal Health Trust Research Centre, Kentford, CB8 7UA

Reference: APP/F3545/X/23/3334323

Scale: Not to Scale



APPEARANCES

FOR THE APPELLANT:

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FOR THE LOCAL PLANNING AUTHORITY:

Robin Green
Counsel for the Council

appointed by West Suffolk Council

He called: Amey Yuill MSc

RULE 6 PARTY:

Celia Reynolds
Counsel for The Jockey Club

appointed by Tom Ashley of
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DOCUMENTS

- IN1 Opening statement for the appellant
- IN2 Opening statement for the Council
- IN3 Opening statement for The Jockey Club
- IN4 Summary of Research Activities 2010 - 2016
- IN5 Authorities Bundle
- IN6 Closing submissions for the Council
- IN7 Closing submissions for The Jockey Club
- IN8 Closing submissions for appellant