



8th September 2026

Application: **PL/2026/02969**

By email to: Isabel.Gatier@wiltshire.gov.uk

URGENT: For your urgent consideration. Please acknowledge this as my **objection** to the above application at The Mount, Upper Seagry, SN15 5EX.

Dear Ms Gatier,

I understand that this application is for a Certificate of Lawfulness and therefore my representation hereby submitted strictly focuses on the legal test of lawfulness. I believe that I have some **credible evidence, to prove that the applicant has misled in the Statutory Declaration (sworn statement)**, which I anticipate will add weight to the decision for refusal of this application. I attach my Letter of Representation which summarises that evidence.

Please can you confirm receipt of this letter.

The sworn statement by the applicant claiming that the stables have always been used for Residential purposes is untrue. I have evidence that the building has been used for a number of years for non-residential use. The applicant has made a false statement which is deceit.

I would like to inform you of the false statements (shown below) made in this application, which should assist you in making the decision against this request for a certificate of lawfulness.

There has not been 3 years of 'residential use' on the non-residential stable block because:

1. Exhibit 5 below: I attach a couple of photos where you can see the Metadata for the image and the exact date when the photo was taken. *The applicant has created* manure heaps with mulch and animal waste from the non-residential stables in 2021 and 2022. I also attach a photo of the Cameroon sheep in 2023 with Metadata
2. Cameroon sheep were housed inside the non-residential stables and their manure was spread along my boundary as shown by Exhibit 1 & 2, which is my complaint to Helen Hill (Animal Health Officer – Public Protection North) and Andy Mullins at Wiltshire Council on 6th December 2023. Andy Mullins visited to see the evidence for himself and agreed it was a total breach of the consents outlined in his previous planning application for a designated area of manure and waste to be within the garden curtilage of the house, The Mount. The applicant deliberately spread this manure

along my boundary to be a nuisance and additionally stored dangerous building materials on the same boundary line. There were several noise complaints made by other neighbours for the noise of kennelled dogs barking inside the non-residential stables.

3. Exhibit 2 shows that Helen Hill visited the site and discussed the findings with Andy Mullins
4. The new barn in the field, which was not constructed as specified in the application, commenced construction in August 2023. It was outlined by the applicant that it would be used for breeding rare breed Cameroon sheep. The number of sheep on this site has not increased, in fact it has decreased! Once the barn was completed, the sheep were then moved from the non-residential stables into the barn and consequently were being kept inside the non-residential stables prior to completion of the barn, which proves that the stables were used agriculturally until completion of the barn. This is contrary to what the applicant is outlining in this application and I am conscious deceit is being played by the applicant to achieve a certificate of lawfulness.
5. The applicant converted part of the old stables to an art studio in May 2025, which is non-residential use. In addition, it can be clearly seen in the pictures (exhibit 3), taken from the public Facebook profile page of the Applicants wife, where Art was being produced for sale. Thus, the applicant was using the stables for non-residential purposes in May 2025 as an Art Studio for a business. Exhibit 3 shows the applicant inside the stables, converting it into an art studio in May 2025, which is a non-residential use of the stables, which contradicts the applicants claim that they have been in residential use for 3 years.
6. Exhibit 4, shows Andy Mullins of Wiltshire Council revisiting site on 6th February 2024

To Conclude, the request for a Certificate of Lawfulness should be refused on the grounds of deception

Exhibit 1:

On 12 Dec 2023, at 12:08, Hill, Helen <Helen.Hill@wiltshire.gov.uk> wrote:

Good afternoon Mr Newman,

I have received an email from yourself regarding possible welfare concerns, namely hazards to sheep at The Mount, Upper Seagry.

I have discussed with Mr Mullins as to his findings and received photos.
Are you able to tell me whom owns the field in question and whom owns the sheep?
I look forward to hearing from you

Kind regards

Helen Hill
Public Protection (Animal Health Officer)
Wiltshire Council
01249 706311
07785 409784

Exhibit 2:

Email to myself from Helen Hill dated 29/01/24

Good afternoon Jack,
Thank you for getting back to me and supplying the landowners names.
I can only investigate the animal welfare concerns although you appear to have many more issues.
I will be in contact with the sheep owners.
Kind regards
Helen

Helen Hill
Public Protection (Animal Health Officer)
Wiltshire Council
01249 706311
07785 409784

Exhibit 3 (publically obtainable screenshot images from Facebook below):

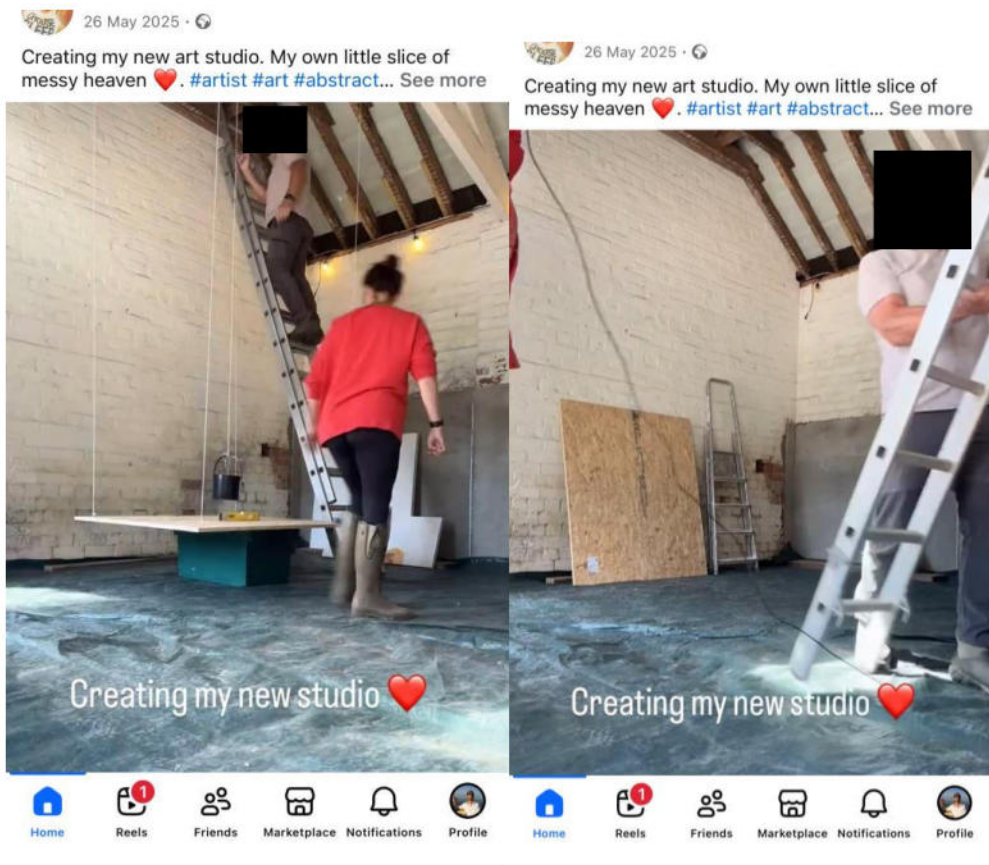


Exhibit 4 – Email from myself to Public Protection North and Helen Hill dated 6th February 2024

To whom it may concern,

Please note that Andy Mullins' colleague has again been to visit site today to see if there has been any progress on the matters in my email below and I have advised her that nothing has been done by the offender to rectify matters and that in fact more manure has been dumped maliciously on my boundary leading to further degradation of this agricultural land. I informed her that Helen Hill of animal welfare has contacted me to say that she is acting to contact the offender and I feel that a full site inspection is required. Lambs were expected in December but a violent ram attack on the ewes has since negated this due to lack of care and management by the owners. This clearly demonstrates the lack of concern from the offender towards agricultural management on this site and consequently the breaches of planning currently being discussed by Samantha Stockley and Nick MCCamphill (Wiltshire Council Planning team) should consider this in their decision process. Furthermore I am also aware that a cctv camera on private land nearby to one area of dumped hazardous bags, photographed by Mr Mullins, has mysteriously been destroyed and removed into thin air overnight at some point recently!! Thank you very much to Andy Mullins and his colleague for acting to support our interests in this matter, it means a lot to us as a community and I hope you can all continue your investigations to enforce the necessary for this disgraceful behaviour.

Kind regards,

Jack H.W. Newman

Exhibit 5: Photos of sheep, photos of new barn (totally different to specification), manure dumped on boundary (not in accordance with the waste disposal specification for the new barn), curtilage spoil and hazardous objects dumped on field boundary from the new barn, old spa building demolished to erect a new building linked to the non-residential stable block, unspecified electrical cabling and drainage / sewerage pipework installed to new barn





Info

DSC_0064_5 (1)

11 September 2021

16 56

Add a description

Chippenham

Size Info
3264 x 2448 4.3 MB 72 dpi 24 bit

Device Info
Sony F5321 4.23 mm f/2 1/100 sec ISO 40
EXP 0 Flash compulsory

Source
This PC



Info

DSC_0006_11 (1)

23 May 2022

11 05

Add a description

Chippenham

Size Info
3264 x 2448 3.1 MB 72 dpi 24 bit

Device Info
Sony F5321 4.23 mm f/2 1/160 sec
ISO 40 EXP 0 No flash compulsory

Source
This PC



The picture above shows the new agricultural barn footings constructed in July 2023. The building visible behind are the stables building referred to as building no.2.