

IMPORTANT - THIS COMMUNICATION AFFECTS YOUR PROPERTY

**TOWN AND COUNTRY PLANNING ACT 1990
(as amended by the Planning and Compensation Act 1991)**

ENFORCEMENT NOTICE

ISSUED BY:

Charnwood Borough Council

**TO: Wealth Property Limited,
153 Norwood Road, Southall, Middlesex UB2 4JB**

1. **THIS NOTICE** is issued by the Council because it appears to them that there has been a breach of planning control, within paragraph (a) of section 171A(1) of the above Act, at the land described below. They consider that it is expedient to issue this notice, having regard to the provisions of the development plan and to other material planning considerations. The Annex at the end of the notice and the enclosures to which it refers contain important additional information.

2. **THE LAND TO WHICH THE NOTICE RELATES**

Land at Syston Mill, Mill Lane, Syston, Leicestershire, LE7 1NS shown edged and shaded red on the attached plan.

3. **THE MATTERS WHICH APPEAR TO CONSTITUTE THE BREACH OF PLANNING CONTROL**

Without planning permission the material change of use of land and buildings, from industrial and agricultural use to sui generis use including industrial, agricultural, residential (building conversion and caravan), vehicle sales, MOT station, vehicle repairs and servicing, vehicle restoration, vehicle body repairs, storage, tyre fitting, siting of caravans and portable structures/buildings, storage, manufacturing and retail; and facilitating development including the installation of fencing, hardstanding, closed circuit television, lighting, and ground works

4. **REASONS FOR ISSUING THIS NOTICE**

1. It appears to the Council that the above breaches of planning control have occurred within the last 10 years, material change of use and other facilitating development.
2. It is established planning policy, at both national and local level, that new development should be permitted outside established settlements in exceptional circumstances only. These circumstances normally relate to an agricultural need. The Land

is within the countryside and there are no exceptional circumstances which justify over-riding the normal planning policies. The development conflicts with Policies CS1 and CS11 of the Charnwood Local Plan 2011-2028 Core Strategy 2015; saved Policies ST/2, CT/1, and CT/2 of the adopted Borough of Charnwood Local Plan 2004; Policies DS1 and C1 of the submitted Charnwood Local Plan 2021- 2037; and the provisions in Paragraph 180 of the National Planning Policy Framework (NPPF), which promote sustainable development in the countryside.

3. The development is prominently located within the countryside. The Local Planning Authority is of the view that the appearance of the development is visually harmful to the character and appearance of its rural surroundings, contrary to Policies CS2 and CS11 of the Charnwood Local Plan 2011-2028 Core Strategy 2015; saved Policies ST/2, CT/1 and CT/2 the Borough of Charnwood Local Plan 2004; the adopted Supplementary Planning Document on Design (2020); policies DS5 and EV1 of the submitted Charnwood Local Plan 2021- 2037, and the provisions in paragraphs 139-141 and 180 of the NPPF which all call for new development to be high quality design and not harm the character and appearance of the countryside.
4. To allow unfettered residential incursions in the countryside, outside the limits to development would likely encourage other similar residential development to take place contrary to Policies CS1 and CS11 of the Charnwood Local Plan 2011-2028 Core Strategy 2015; ST/2 and CT/1 of the Borough of Charnwood Local Plan 2004; and DS1, C1 and EV1 of the submitted Charnwood Local Plan 2021- 2037; and the provisions in paragraphs 88, 89 and 180 of the NPPF.
5. The Local Planning Authority has assessed the development on the Land and considers that there has been a net loss in biodiversity due to the nature of the activity and its continued extension into areas of habitat. There is no evidence from the landowners or their tenants to confirm they have assessed the biodiversity impacts of the development, or to confirm that an assessment has been made and such a report is available. No report has been forwarded to the Local Planning Authority for consideration. Therefore, it is considered that development is contrary to Policy CS13 of the Charnwood Local Plan 2011-2028 Core Strategy 2015; Policy EV6 of the submitted Charnwood Local Plan 2021-2037; and the provisions in paragraphs 186-188 of the NPPF.
6. There is a potential for flooding of the Land due to its location being in Flood Zone 3a and 3b. Without a flood risk assessment for the whole development; supported by a sequential test for

the siting of caravans only; an assessment of the risks of flooding cannot be made. There is no evidence from the landowners or tenants to confirm that such a report is available, and no report has been forwarded to the Local Planning Authority for consideration. Therefore, it is considered, the development is contrary to The Charnwood Strategic Flood Risk Assessment 2014; to Policy CS2, CS16 of the Charnwood Local Plan 2011- 2028 Core Strategy 2015; Policy EV/1 of the Borough of Charnwood Local Plan 2004; and the Environmental Objective 7 and Policies DS5, CC1, CC4, EV6 of the submitted Charnwood Local Plan 2021-2037 and the provisions in paragraphs 165 -175 of the NPPF.

7. There is potential for contamination from the development of the Land due to the nature of the activity involving the storage and parking of vehicles and parts and the burning of waste. Without a Preliminary Risk Assessment report (also known as a Phase 1 Desk Top Study) being undertaken for the activity on the Land, an assessment of the risks to land and Controlled Waters cannot be made. There is no evidence from the landowners or their tenants to confirm that such a report is available, and no report has been forwarded to the Local Planning Authority for consideration. Therefore, it is considered, the development is contrary to Policy CS2 and CS16, of the Charnwood Local Plan 2011- 2028 Core Strategy 2015; the Environmental Objective 7 and Policies DS5, CC4, EV6 of the submitted Charnwood Local Plan 2021-2037; and the provisions in paragraphs 180, 189 -190 of the NPPF.
8. There are potential highway safety issues caused by the current design of the junction of Mill Lane with Fosse Way; and for pedestrians using the underbridge. Without an assessment of the development on the adopted highway, the impact on highway safety, or the residual cumulative impacts on the road network, an assessment of the risks and impacts cannot be made. There is no evidence from the landowners or their tenants to confirm that such an assessment is available, and no report has been forwarded to the Local Planning Authority for consideration. Furthermore, the development does not constitute sustainable development in transport terms and the developer has not provided an assessment of travel to confirm the priority of modes of transport to and from the site which encourages public transport use; address the needs of people with disabilities; reduce conflicts between pedestrians, cyclists and vehicle places; allow efficient delivery of goods and access by service and emergency vehicles; and enable charging of plug-in and other ultra-low emission vehicles. Therefore, development is contrary to Saved Policy TR/18 the adopted Borough of Charnwood Local Plan 2004; Policies CC5, T3 and INF2 of the

submitted Charnwood Local Plan 2021-2037; and the provisions in paragraphs 114 - 117 of the NPPF.

5. WHAT YOU ARE REQUIRED TO DO

- 1) Cease the use of the Land for the parking and storing of vehicles associated with the material change of use to sui generis use including industrial, agricultural, residential (building conversion and caravan), vehicle sales, MOT station, vehicle repairs and servicing, vehicle restoration, vehicle body repairs, tyre fitting, siting of caravans and portable structures/buildings, storage, manufacturing, and retail.
- 2) Cease the use of the Land for the selling of vehicles and any other retail uses.
- 3) Cease the use of the Land for the storage of scrap vehicles.
- 4) Cease the use of the Land for the storage of vehicle parts.
- 5) Cease the use of the Land for the storage and siting of caravans and trailers.
- 6) Cease the use of the Land for the storage and siting of portable buildings, sheds, and containers.
- 7) Cease the use of the Land for vehicle repairs servicing, MOT testing, vehicle restoration, vehicle body repairs and tyre fitting.
- 8) Cease the use of the Land for workshops, offices, storage, manufacturing, retail, and residential purposes.
- 9) Cease depositing waste on the Land.
- 10) Remove from the Land all vehicles associated with the sui generis use including industrial, residential, vehicle sales, MOT station, vehicle repairs, storage and servicing, vehicle restoration, vehicle body repairs, tyre fitting, siting of caravans and portable structures/buildings, storage manufacturing.
- 11) Remove from the Land all vehicle parts.
- 12) Remove from the Land all plant machinery associated with the sui generis use including industrial, residential, vehicle sales, MOT station, vehicle repairs, storage and servicing, vehicle restoration, vehicle body repairs and tyre fitting, siting of caravans and portable structures/buildings, storage manufacturing and retail.
- 13) Remove from the Land all caravans and trailers.
- 14) Remove from the Land all portable buildings, sheds, and containers.
- 15) Remove from the Land all means of enclosure (including fencing, gates etc and their associated foundations). Except for the timber post and rail boundary fencing as shown yellow on the plan attached at Appendix 2.
- 16) Remove from the Land all closed circuit television cameras, lighting, audio equipment and their supports and foundations within the areas used for vehicle sales on the southern side of the dividing watercourse and as shown outlined green on the plan attached to Appendix 3.

- 17) Remove from the Land all other paraphernalia associated with the sui generis use including industrial, residential (building conversion and caravan), vehicle sales, MOT station, vehicle repairs, storage and servicing, vehicle restoration, vehicle body repairs, tyre fitting.
- 18) Remove from the Land, and Buildings all items used in association with residential uses.
- 19) Remove from the Land all imported materials including, hard surfacing, surface dressing, base material, sub-base material, and geotextile/textile matting.
- 20) Remove from the Land all contaminants including but not limited to all vehicle fluids, buried waste, burned waste and general waste.
- 21) Remove from the Land the electricity supply and associated cabling to the vehicle sales area on the southern side of the Land and shown outlined purple on the plan attached to Appendix 3.
- 22) Remove from the Land the water supply and all associated pipework to the land on which the vehicle sales on the southern side of the Land are occurring shown outlined purple on the plan attached to Appendix 3.
- 23) Remove from the Land any sewerage connection and associated pipework to the land on which the vehicle sales to the southern side of the Land are occurring shown outlined purple on the plan attached to Appendix 3.
- 24) Reinststate the Land to its former condition and in accordance with the year 2000 aerial photograph attached at Appendix 1, including the reinstatement of ground levels, boundary means of enclosure, the planting of native species semi mature trees, shrubs, bushes, and grass seed mixes to match those of the adjacent land. The native species semi mature trees shrubs, bushes, and grass, required by this step, shall be planted in accordance with the horticultural industry standards or suppliers' instructions. The landowner shall inform the Local Planning Authority that this step has been completed within 48 hours of its completion.
- 25) Remove from the Land all plant, machinery, tools, debris, waste, and materials arising from undertaking steps 1-25 above.
- 26) All new planting, as required by step 25 shall be maintained, including, but not limited to, watering and weeding, in accordance with the horticultural industry standards or suppliers' instructions for a period of 5 years from the completion of planting.
- 27) The new planting as required by step 25 above, shall be monitored for growth and establishment for period of:
 - A) Trees 30 years
 - B) Bushes and shrubs 10 years
 - C) Grasses 5 years
 from the completion of the planting, to ensure re-establishment of the previously removed vegetation. Any planting that is dead

dying, dangerous or destroyed in the time frames set out above shall be replaced with the same semi mature native species trees, shrubs and bushes, and grass of the same proportions at the time of discovery.

6. TIME FOR COMPLIANCE

Steps 1 to 25 shall be completed within 15 months from the date the notice takes effect.

Step 26 shall be completed within 5 years and 15 months from the date the notice takes effect.

Step 27 shall be completed as follows:

27A) Trees within 30 years and 15 months from the date the notice takes effect.

27B) Bushes and shrubs within 10 years and 15 months from the date the notice takes effect.

27C) Grasses within 5 years and 15 months from the date the notice takes effect.

7. WHEN THIS NOTICE TAKES EFFECT

This notice takes effect on **Tuesday 5th November 2024** unless an appeal is made against it beforehand.

Signed



On behalf of Charnwood Borough Council

Dated: 23 September 2024

ANNEX

YOUR RIGHT TO APPEAL

You can appeal against this Notice in writing to the Secretary of State, but any appeal must be received, or posted in time to be **received** by the Secretary of State **before** the date this notice takes effect as specified in paragraph 7 of the notice. If you decide to appeal, you should follow the guidance provided in the attached note from the Planning Inspectorate.

FEE PAYABLE FOR THE DEEMED APPLICATION

If your ground of appeal includes ground (a) that planning permission should be granted, you must include with your appeal a fee, which is double that payable for a normal planning application. The total fee payable is **£1156** and should be paid to Charnwood Borough Council.

The fee can be sent with your appeal forms to the Council.

WHAT HAPPENS IF YOU DO NOT APPEAL

If you do not appeal against this enforcement notice, it will take effect on the date the notice takes effect which is specified in paragraph 7 of the notice, and you must then ensure that the notice is complied with. Failure to comply with an enforcement notice that has taken effect, is a criminal offence and can result in legal proceedings and/or remedial action by the Council.

PERSONS SERVED WITH A COPY OF THIS NOTICE:

Owners of Development

- 1) Surbeer Singh Nagpal, Director, Wealth Property Limited, 153 Norwood Road, Southall, Middlesex, UB2 4JB
- 2) Asphal Singh Babbar, Director, Wealth Property Limited, 153 Norwood Road, Southall, Middlesex, England, UB2 4JB

Occupiers

- 3) Surbeer Singh Nagpal, Director, Wealth Property Ltd, Unit E, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 4) Asphal Singh Babbar, Director, Wealth Property Ltd, Unit E, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 5) Surbeer Singh Nagpal, Director, Wealth Property Ltd, Unit A & C, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 6) Asphal Singh Babbar, Director, Wealth Property Ltd, Unit A & C, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 7) Surbeer Singh Nagpal, Director, Wealth Property Ltd, Unit B, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 8) Asphal Singh Babbar, Director, Wealth Property Ltd, Unit B, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS

- 9) Ioan-Bogdan Feher, Director, Bogdan Feher Ltd, Unit 7, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 10) Ioan-Bogdan Feher, Director, Bogdan Feher Ltd, Unit 10 Office, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 11) Ioan-Bogdan Feher, Director, Bogdan Feher Ltd, Unit D, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 12) Ioan-Bogdan Feher, Director, Bogdan Feher Ltd, Vehicle Compound, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 13) Ioan-Bogdan Feher, Director, Bogdan Feher Ltd, 6 Wingate Drive, Leicester, United Kingdom, LE3 0US

- 14) Owner/Occupier Unit 7a Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS

- 15) Owner/Occupier, Unit 16, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS

- 16) County Roofing (Leicester) Ltd, Unit 20. Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 17) Vicki Shaw, Company Secretary, County Roofing (Leicester) Ltd, 15 Balliol Avenue, Syston, Leicester, Leicestershire, LE7 2BX
- 18) Scott Shaw, Director, County Roofing (Leicester) Ltd, 15 Balliol Avenue, Syston, Leicester, Leicestershire, LE7 2BX
- 19) County Roofing (Leicester) Ltd, Registered Office, 2 Grange Avenue, Rearsby, Leicester, England, LE7 4FY

- 20) E-Lease Limited Unit 22, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 21) E-Lease Limited, External Parking Area, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 22) Martha Libby Watts, Company Secretary, E-Lease Limited, Park House, 37 Clarence Street, Leicester, United Kingdom, LE1 3RW
- 23) Joanne Watts, Director, E-Lease Limited, Park House, 37 Clarence Street, Leicester, United Kingdom, LE1 3RW

- 24) Green Goblin Garage Limited, Unit A, C & Lean To, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 25) Claudiu Voinescu, Director, Green Goblin Garage Limited, 120 Bradgate Drive, Coalville, England, LE67 4HG

- 26) Mr. Peter Chimanga, Unit B1, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS

- 27) Heritage Bodyworks Ltd Unit B2, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 28) Abdul Imran Sheikh, Director, Heritage Bodyworks Ltd, 14 Montvale Gardens, Leicester, England, LE4 0BL
- 29) Azmei Sheikh, Director, Heritage Bodyworks Ltd, 14 Montvale Gardens, Leicester, England, LE4 0BL

- 30) Nippon Autos Ltd, Land, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 31) Matloob Hussain, Director, Nippon Autos Ltd, Abingdon Business Centre 346, Osmaston Road, Derby, Derbyshire DE24 8AG
- 32) Mr David Leonard, Unit 17a, Syston Mill, Mill Lane, Syston, United Kingdom, LE7 1NS
- 33) Owner/Occupier Unit 17a, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 34) Owner/Occupier Unit 17b, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 35) Owner/Occupier Unit 17c, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 36) Sotiris Thanasis, Director, Angelos Thanasis Ltd, Unit E1, Syston Mill, Mill Lane, Syston, United Kingdom, LE7 1NS
- 37) Auto Motors MK LTD, Unit E2, Syston Mill, Mill Lane, Syston, United Kingdom, LE7 1NS
- 38) Lukasz Cezary Malyszko, Director, Auto Motors MK LTD, 4 Brecon Close, Corby, England, NN18 8GT
- 39) Auto Motors MK LTD, Registered Office, 88 Oakley Hay Lodge, Great Fold Road, Corby NN18 9AS
- 40) Mr Krish Bhakta, Unit 18, Syston Mill, Mill Lane, Syston, United Kingdom, LE7 1NS
- 41) Addicted Vape Limited, Unit 17, Syston Mill, Syston, LE7 1NS
- 42) Charanjit Singh Grover, Director, Addicted Vape Limited, 153 Norwood Road, Southall, Middlesex, England, UB2 4JB
- 43) Miss Claire Watts, Totally Cobs Animal Feeds, Unit 18, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 44) Owner Occupier, Grazing Fields, Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 45) Owner/Occupier, Land at Syston Mill, Mill Lane, Syston, Leicester, England, LE7 1NS
- 45) Copy affixed to the Site



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Reference No: E/24/0010
Location: Land at Syston Mill, Mill Lane, Syston, Leicestershire, LE7 1NS
Scale: 1:2500



Appendix 1



Image from Google Earth Pro
Image date 01/01/2000

Appendix 2



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Reference No: E/24/0010
Location: Land at Syston Mill, Mill Lane, Syston, Leicestershire, LE7 1NS
Scale: 1:2500
Boundary Fence: Yellow Line



Appendix 3



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Reference No:

E/24/0010

Location:

Land at Syston Mill, Mill Lane, Syston, Leicestershire, LE7 1NS

Scale:

1:2500

Vehicle Sales area:

Edged Green





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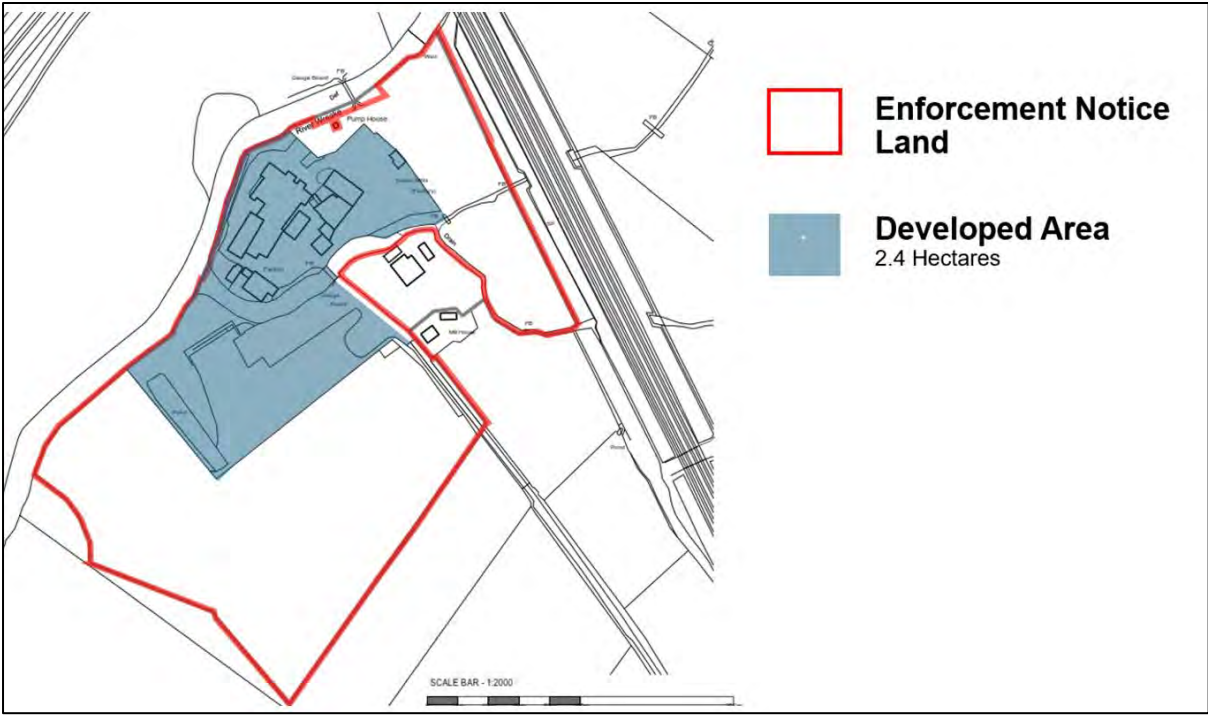
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Reference No: E/24/0010
Location: Land at Syston Mill, Mill Lane, Syston, Leicestershire, LE7 1NS
Scale: 1:2500



APPENDIX 3 – Council’s Map Showing Area of Alleged Breach



APPENDIX 4 – Appellant's Parcel ID Map



Parcel ID Map (1)

APPENDIX 5 – David Knapp Statutory Declaration

DATED

2025

STATUTORY DECLARATION OF

DAVID JOHN KNAPP

**RELATING TO THE APPEAL AGAINST THE ENFORCEMENT NOTICE ISSUED BY
CHARNWOOD BOROUGH COUNCIL (REF. E/21/0183) CONCERNING LAND AT
SYSTON MILL, MILL LANE, SYSTON, LEICESTERSHIRE, LE7 1NS**



1st Floor, One Colton Square
Leicester
LE1 1QH

Ref: 2528532.2.JJM

I, David John Knapp, do solemnly and sincerely declare as follows:

1. I was born on the 2nd October 1953 and I currently reside at 5 The Orchard, Seagrave, Loughborough, Leicestershire, LE12 7LH.
2. I make this declaration of truth in support of an appeal against the Enforcement Notice ref: E/21/0183 issued by Charnwood Borough Council and dated 23 September 2024 ("the Enforcement Notice") in respect of the land at Syston Mills, Mill Lane, Syston, Leicestershire, LE7 1NS ("the Site").
3. The Site is identified edged red on **page 1 of the Exhibit**. I understand this is the relevant map taken from the Enforcement Notice.

Background

4. I am a mechanic and I have worked in the industry for over 40 years. I retired from full-time work in 2020 during the COVID-19 pandemic and am now semi-retired. I am very familiar with the Site and currently support Wealth Property Limited ("the Appellant") in overseeing operations on the Site.
5. I first visited the Site in approximately 1984. I was looking for a location to run a mechanics workshop.
6. In the 1980's, the Site was owned by Bourne End Property Trading Limited. Stamina Components (Syston) Ltd were a shoe sole manufacturer, and they were the main tenant on the Site. Stamina Components (Syston) Ltd sublet their unit (Unit 20) to me from 1984 until 1989. In 1989, I moved into Unit 23 (part of the land to the southeast of the Site and which is outside of the Site boundary edged red on **page 1 of the Exhibit**) as Stamina Components (Syston) Ltd were going through administration. The landowners then became my direct landlord.
7. I subsequently occupied Unit 23 trading as a mechanic. Most of my business was from local recommendations.
8. When I retired in 2020, my tenancy of Unit 23 ended. I no longer have a tenancy of Unit 23 or any other unit/land on the Site.
9. From 1989, I was asked by the landowner at the time to keep readings of electric meters of other Units on the Site, transfer these to a spreadsheet and send them to the landowner. I was also asked to oversee other maintenance tasks on the Site such as managing repairs of the road and arranging for the cesspits to be emptied. I sent invoices to the landowner (with their agreement) for the operations I undertook on the Site which were subsequently paid.
10. Since 2021, I have been attending the Site at least fortnightly to carry out these tasks. I have also carried out viewings of potential tenants on behalf of the landlord/landowner.

Land south of the watercourse

11. **Page 2 of the Exhibit** illustrates the various parcels contained within the Site.
12. The area of land identified as parcels 101 to 106 (inclusive) were tenanted by Stamina Components (Syston) Ltd in the 1980s. Part of this land was used as a by-product waste area. **Pages 3 to 4 of the Exhibit** are Official Copies of the Land Registry title to the Site (registered under title number LT248469) in March 1999. The title plan

(**page 3 of the Exhibit**) illustrates the pits were located to the south of an existing sluice gate and were used for the storage of sludge paper pulp produced as excess from the manufacture of insole boards. The pits were filled in by Stamina Components (Syston) Ltd in the late 1980s.

Parcel 101

13. All of the land identified at parcel 101 (on **page 2 of the Exhibit**) has had planning permission for the parking of motor vehicles since the 1980s. The aerial photographs exhibited at **pages 5 to 9 of the Exhibit** show the land used for the parking of vehicles over the years, and as early as 2006. Ordnance Survey plans from 1986 and 1993 exhibited at **pages 10 to 11 of the Exhibit** also identify parcel 101 as an established area used for parking.
14. The western extent of parcel 101 occasionally greened over with chalk grass and weeds which were regularly cut back or flattened to enable parking to continue. Since the 1980s, the land in parcel 101 was underlaid with hardstanding.
15. All of the land in parcel 101 has been used as a parking area for the Site by tenants or as an overflow for visitors to the units on the Site.

Parcel 102

16. Since the 1st May 2021, parcel 102 has been occupied by Nippon Motors who have used the area for the display and sale of Japanese motor vehicles. The hardstanding in this location was laid after April 2020.

Parcel 103 (103A and 103B)

17. Parcels 103A and 103B formerly formed one parcel (hereafter referred to as 'Parcel 103'). Parcel 103 was occupied by Topps Taxis between 2013 and 2020 for the storage of their vehicle fleet. This area was covered in hardstanding prior to Topps Taxis taking occupation and has therefore been covered in hardstanding for over 12 years. This is illustrated by the aerial photos at **pages 5 to 9 of the Exhibit**.
18. Parcel 103 was subsequently leased to Bogdan Feher in 2021 who then sublet parcel 103A to Syston Autos who continue to use the parcel for the sale and display of vehicles.
19. Since 2021, Bogdan Feher has leased parcels 103B to 106 inclusive (with parcel 103A being sublet to Syston Autos).

Parcels 104-106

20. From 2021 onwards, Bogdan Feher cleared and surfaced the western part of parcel 104. Since then, he also carried out incremental surfacing works on parcels 105 and 106 with gravel (see aerial photo from April 2021 on **page 9 of the Exhibit**). All three parcels have since been used for the storage and parking of motor vehicles for sale.
21. Parcel 105 (now occupied by Bogdan Feher) was the former site of the industrial sludge pit (see **page 3 of the Exhibit** which shows the sludge pits marked up on the Land Registry Title Plan).

The "Mill Site"

22. I recall, during my occupation of Unit 23, Charnwood Borough Council inspecting and assessing the industrial units (situated northeast of parcels 101 to 106 and to the south

of the River Wreake) for the purposes of business rates and determining each to be individual units.

23. **Unit 7** was previously occupied by Imperial Roofing Supplies UK Ltd for storage of slate and felting materials. They vacated in 2020. Recruitment Investments Limited occupied the unit from June 2021 to May 2024 for use as storage. The unit is now vacant.
24. **Unit 7A** is a former B2 use car repair workshop which was occupied by Green Goblin Garage Ltd and is now leased to Bogdan Feher who uses the unit for the repair and maintenance of motor vehicles in association with his use and occupation of parcels 103B to 106.
25. **Unit 20** had been used as a workshop and was occupied by me until 1989. A company called County Roofing (Leicester) Limited (who were, as I understand it, the same business as Imperial Roofing Supplies UK Ltd that were in Unit 7) occupied the unit for storage until 2024. The unit is now vacant.
26. **Units A, C and Lean** have a history of industrial uses, including woodworking, skip repair and the manufacturing of running tracks. Since 15th January 2024, the unit has been occupied by Green Goblin Garage Ltd (formerly of Unit 7A) who repair motor vehicles.
27. **Units B1 and B2** formerly formed one unit (used as car workshop) and were split in 2022. Unit B1 is occupied by Heritage Bodyworks Ltd and used as a car workshop. Unit B2 is vacant.
28. **Units E1 and E2** formerly formed one unit and was leased to Gordon Darby from 2016 to 2020 and used as a car workshop. The unit was then leased to Anthony Dewick until January 2022 and continued to be used as a car workshop. The landowner then undertook some repairs to the unit (e.g. installing a new roof) and split the unit into two. Unit E1 has been occupied by Sotiris Thanasis (trading as Custom Paints Soan) for use as a car paint workshop since 2023. Unit E2 was occupied by Happy Tyres Limited for use as vehicle tyre storage, fitting and sales but is now being occupied by an individual for use as a car workshop.
29. I understand that the current occupant of Unit E2 had failed to keep up to date with rent and electrical payments and the landlord cut off Unit E2's electricity supply and bolted the entrance shut. The entrance has since been reopened and continues to be used by the individual as a car workshop.
30. To the northeast of Units E1 and E2 is an area of parking used in connection with Units E1 and E1.
31. To the immediate north of Units E1 and E2 is a small rectangular area where a single caravan is parked. I understand this to be associated to the occupier of either Unit E1 or E2. To my actual knowledge, it is not used as a residence.
32. **Unit D** has been leased to Bogdan Feher Ltd since the 1st March 2021. The building has been used for the maintenance and repair of motor vehicles.
33. **Unit 10** was in use as offices when I first occupied a unit on the Site in 1984 and has continued as such ever since. From 1st May 2021 until recently, the building was in use as an office and occupied by Bogdan Feher Ltd. The unit is currently vacant.

34. **Unit 16** was occupied by SMC Site Services for over the last ten years for industrial steel fabrication and offices. SMC Site Services vacated the unit in July 2024. The unit is currently vacant.
35. **Units 17 A, B and C** is a building adjoining Unit 22. The first floor (Unit 17B) continues into Unit 22 on the first floor (Unit 22FF). Unit 17 comprises of three internal units providing motor repair facilities. Unit 17A is now vacant but was occupied as motor repair workshop by Highcross Bodywork & Customs Ltd and subsequently by a Mr Singh for a period of three months until he vacated in July 2024. Units 17B and 17C are currently vacant but have previously been used as a car repair workshop, the most recent tenant of which occupied the units from 2016 to 2020.
36. **Unit 18** has been leased to Krish Bhakta since 1st February 2024. The unit is now used by him as a motor garage for car repairs. The unit was formerly used for mechanical plant maintenance until 2018 and then for storage until November 2023.
37. **Unit 22 (GF and FF)** are two separate units. The ground floor unit (22GF) has been occupied by E Lease Ltd (trading as 'wesellanyvans.com') for approximately 13 years and used as a car showroom/sales office and workshop. The first floor unit (22FF) is currently vacant but was previously used as an office, for industrial use and as storage.
38. **Parcel 107** (that being parcels 107A and 107B) is located to the east of Unit 22. The northern half of parcel 107, parcel 107A, is used by E Lease Ltd for the parking, storing and sale of vans and cars in association with their use and occupation of Unit 22GF. The southern half of parcel 107, parcel 107B, is currently unoccupied but was formerly used by E Lease Ltd as an extension of parcel 107A until late 2024.
39. 14 years ago, under the previous landlord, parcel 107 was hardscaped and since then has been used for the display and sale of cars and vans. This is corroborated by aerial photographs, which in January 2010 (see **page 6 of the Exhibit**) show parcel 107 hardscaped and used for the parking of vehicles. Prior to the hardscaping of parcel 107, the area was still used for the parking and storage of vehicles, as illustrated by aerial photographs in March 2006 (see **page 5 of the Exhibit**).
40. Within parcel 107A is **Unit F**. This is a temporary sales office used by E Lease Ltd in association with the use of parcel 107A and Unit 22GF for the selling of motor vehicles.

AND I HEREBY MAKE THIS DECLARATION consciously believing the same to be true and by virtue of the Statutory Declarations Act 1835

Signature of declarant:

DECLARED at (*location*)

on this day of 2025

before me (*name in BLOCK CAPITALS*)

Signed (*signature*)

EXHIBIT

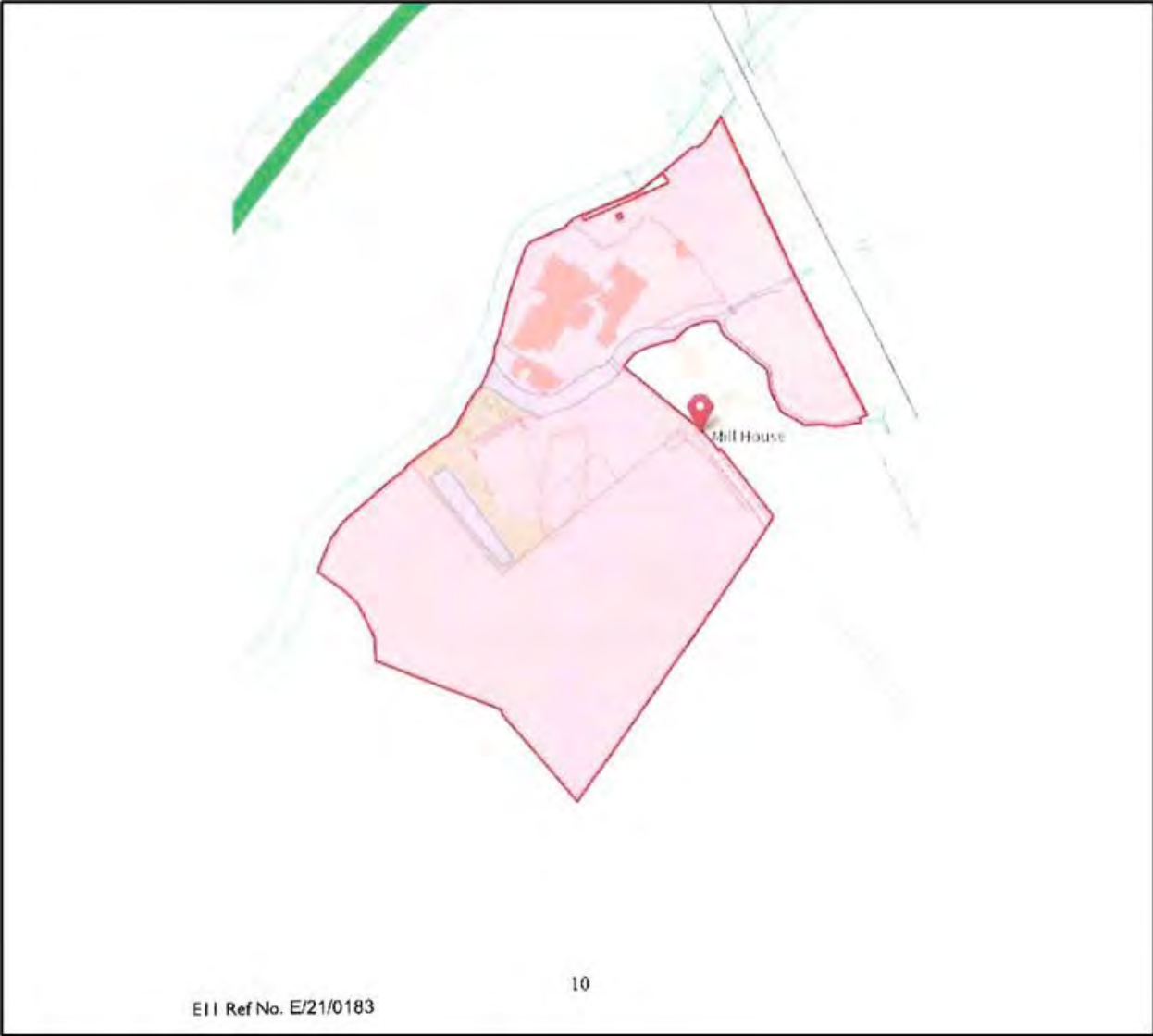
Signature of declarant:

DECLARED at (*location*)

on this day of 2025

before me (*name in BLOCK CAPITALS*)

Signed (*signature*)



EII Ref No. E/21/0183

10



Parcel ID Map (1)

H.M. LAND REGISTRY

LT 248469

ORDNANCE SURVEY
PLAN REFERENCE

SK6111 SK6112

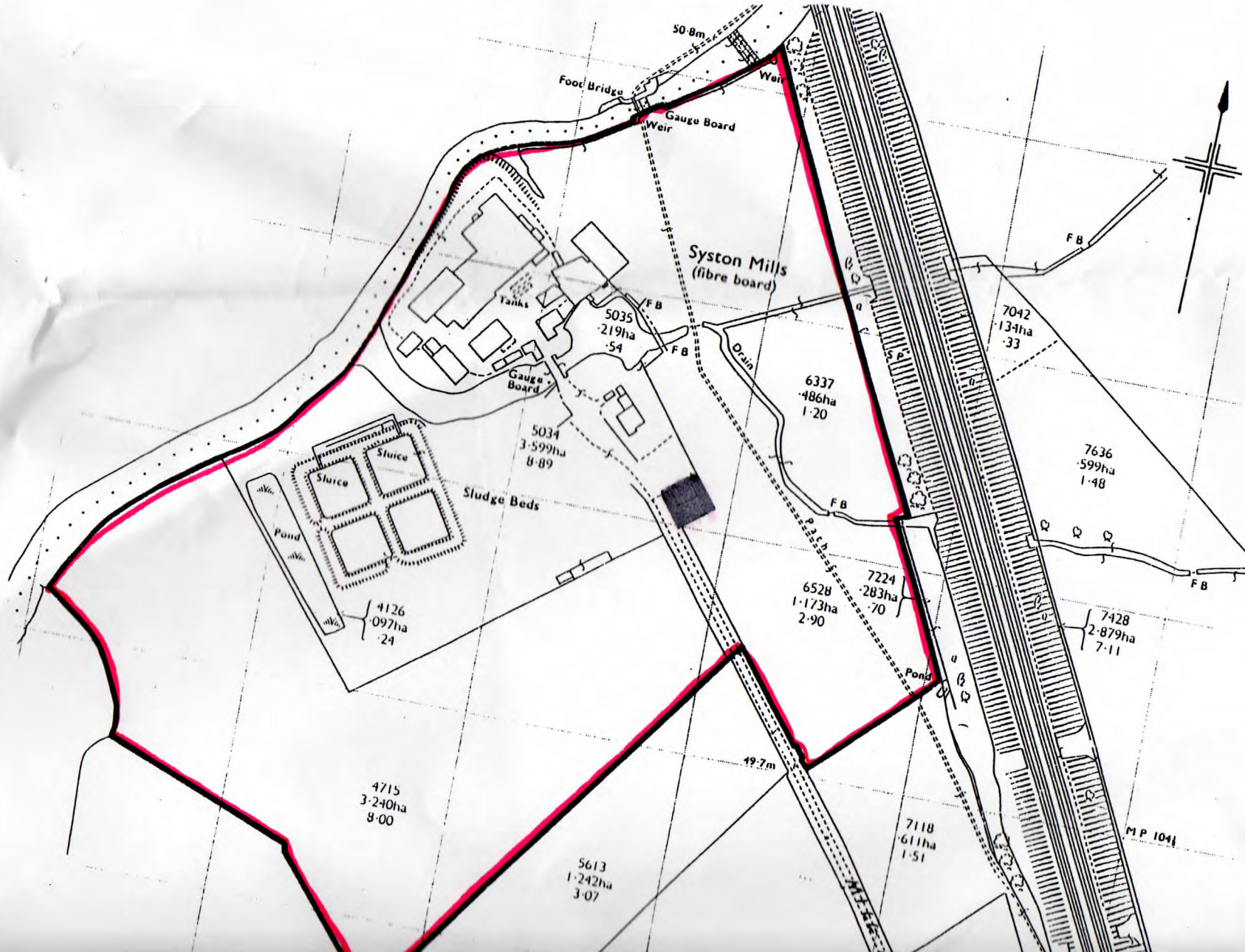
Scale
1/2500

COUNTY LEICESTERSHIRE

DISTRICT

CHARNWOOD

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This OFFICE COPY shows the state of the title plan on ~~30 October~~ 1999 and is admissible in evidence to the same extent as the original. This office copy of the title plan may be subject to minor distortions in scale. Issued on 27 October 1999 by the Leicester District Land Registry. Crown copyright. Produced by HMLR. Further reproduction in whole or part is prohibited without the prior written permission of Ordnance Survey. Licence Number GD272728.

14 MARCH

OFFICE COPY OF REGISTER ENTRIES

This office copy shows the entries subsisting on the register on **4 March 1999**.
This date **must be quoted as the 'search from date'** in any official search application based on this copy.

Under s.113 of the Land Registration Act 1925 this copy is admissible in evidence to the same extent as the original.

Issued on 27 October 1999 by HM Land Registry.

This title is administered by the **Leicester District Land Registry**.

HM Land Registry

Title Number : **LT248469**



Edition Date : 20 January 1998

A: Property Register

containing the description of the registered land and the estate comprised in the Title.

COUNTY	DISTRICT
LEICESTERSHIRE	CHARNWOOD

1. (18 June 1992) The **Freehold** land shown edged with red on the plan of the above Title filed at the Registry and being Syston Mills, Mill Lane, Syston.

B: Proprietorship Register

stating nature of the title, name and address of the proprietor of the land and any entries affecting the right of disposal

Title Absolute

1. (20 January 1998) **PROPRIETOR**: BOURNE END PROPERTY TRADING LIMITED (Co. Regn. No. 02369374) of 5 Wigmore Street, London W1.
2. (20 January 1998) **RESTRICTION**: Except under an order of the registrar no disposition by the proprietor of the land or made in exercise of the power of sale in any Charge subsequent to that dated 23 December 1997 in favour of The Hongkong and Shanghai Banking Corporation Limited referred to in the Charges Register is to be registered or noted without the consent of the proprietor for the time being of the said Charge.







4/2015

River Wreake

Happy Tyres

LE7 1NS

System Autos

The Viking Group Leicester

Motorline Car Sales

Blue Ice Motors

Holywell Cars

Google Earth

1985

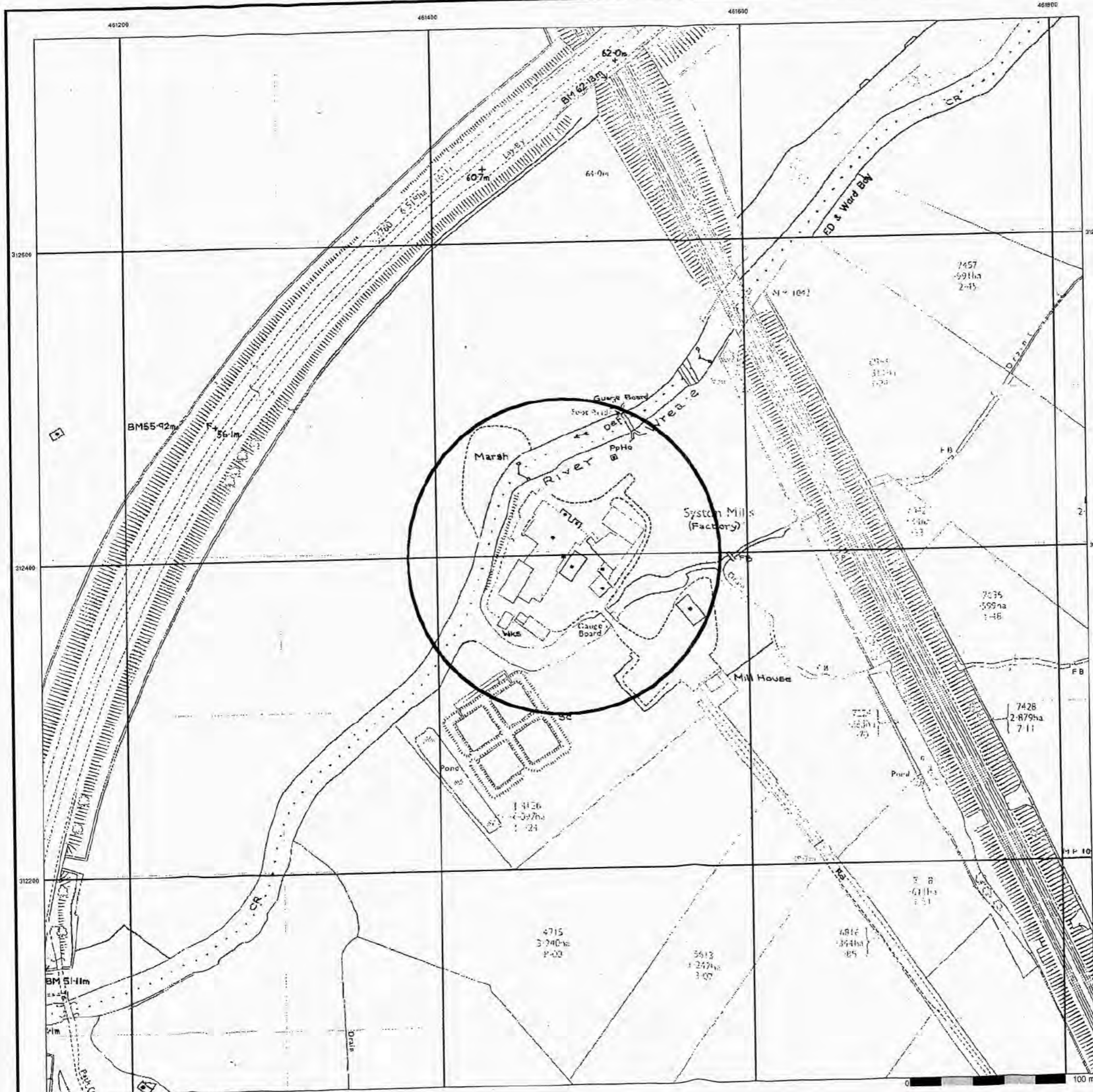
Imagery Date: 4/21/2015 52°42'18.96" N 1°05'26.97" W elev 48 m eye alt 272 m

7



Imagery Date: 4/21/2020 52°42'18.96" N 1°05'26.97" W elev 48 m eye alt 272 m





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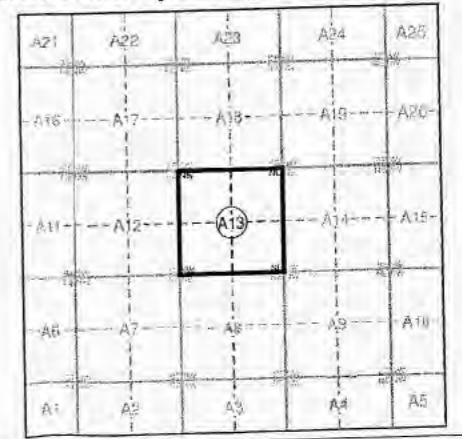
**Additional SIMs
Published 1986**
Source map scale - 1:2,500

The SIM cards (Ordnance Survey's 'Survey of Information on Microfilm') are further, minor editions of mapping which were produced and published in between the main editions as an area was updated. They date from 1947 to 1994, and contain detailed information on buildings, roads and land-use. These maps were produced at both 1:2,500 and 1:1,250 scales.

Map Name(s) and Date(s)



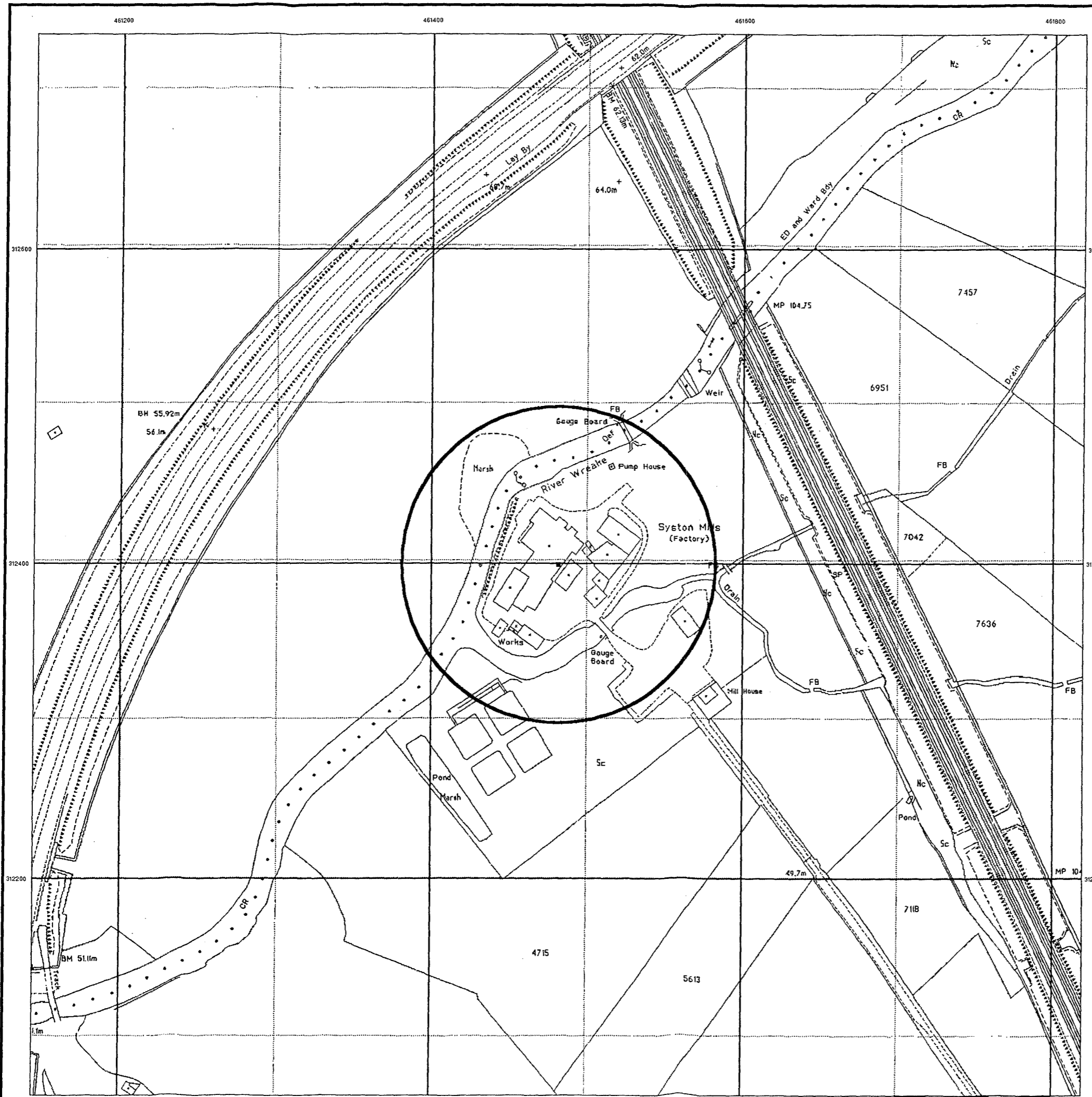
Historical Map - Segment A13



Order Details
 Order Number: 24462492_1_1
 Customer Ref: Gen
 National Grid Reference: 461480, 312400
 Slice: A
 Site Area (Ha): 0.01
 Search Buffer (m): 100

Site Details
 Knapco Motors, Mill Lane, Syston, LEICESTER, LE7 1NS

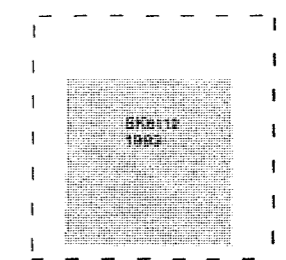
LANDMARK
 Information Group
 Tel: 0870 850 6670
 Fax: 0870 850 6671
 Web: www.envirocheck.co.uk



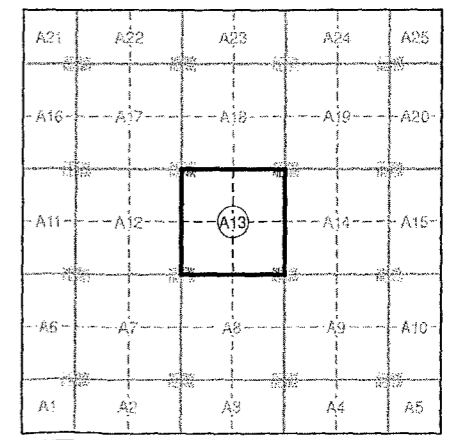
**Large-Scale National Grid Data
Published 1993
Source map scale - 1:2,500**

'Large Scale National Grid Data' superseded SIM cards (Ordnance Survey's 'Survey of Information on Microfilm') in 1992, and continued to be produced until 1999. These maps were the fore-runners of digital mapping and so provide detailed information on houses and roads, but tend to show less topographic features such as vegetation. These maps were produced at both 1:2,500 and 1:1,250 scales.

Map Name(s) and Date(s)



Historical Map - Segment A13



Order Details

Order Number: 24462492_1_1
Customer Ref: Gen
National Grid Reference: 461480, 312400
Slice: A
Site Area (Ha): 0.01
Search Buffer (m): 100

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Knapco Motors, Mill Lane, Syston, LEICESTER, LE7 1NS