



To: The Planning Inspectorate,
TeamE1@planninginspectorate.gov.uk

Date: 19 March 2026

Appeal Reference: 6005948

Site Address: Riverside Farm, Fairham Brook Lane, Bunny,
Nottingham, NG11 6SQ

Appellant: Riverside Farm JK Limited

**Subject: URGENT: Formal Request to add Ground (b) to
Enforcement Appeal**

Dear Case Officer,

I am writing regarding the enforcement appeal for the above site, which officially commenced on 19 March 2026. I would like to formally request that **Ground (b)**—that the breach of planning control alleged in the enforcement notice has not occurred as a matter of fact—be added to my grounds of appeal.

This ground is fundamental to my case for the following reasons:

- 1. Factual Error in the Notice:** The Council alleges the building was erected "without the benefit of planning permission or prior approval." This is factually incorrect. I secured **deemed consent** via the Prior Notification process (GPDO Schedule 2, Part 6, Class E) after the Council failed to issue a decision within the 28-day statutory period (which expired on 4 January 2024).
- 2. Mischaracterisation of the Structure:** The notice describes a "domestic style conservatory." This is a factual error. The glazed section is a functional **passive solar kiln** used for the drying of medicinal herbs (lavender, mint, chamomile, linden, sage, rosemary and more) and process and is essential for the

on-site processing of herbal extracts. It is a workspace, not a domestic structure.

- 3. No Breach Existed:** Because the building was constructed under a lawful deemed consent for a forestry use, the breach alleged in the notice did not occur as a matter of fact.

Adding Ground (b) at this early stage will not cause any prejudice or delay, as the evidence overlaps entirely with the Statement of Case already provided. It simply ensures the Inspector has the correct legal remit to address the Council's factual errors.

I look forward to your confirmation that Ground (b) has been added to the appeal record.

Yours sincerely,

Dr Julita Geary
Riverside Farm JK Limited