

**IN THE MATTER OF S174 TOWN & COUNTRY PLANNING ACT 1990**  
**RE: APPEAL AGAINST THE ENFORCEMENT NOTICE DATED [17 November 2025]**

APPELLANTS: Mr Adam Willis & Mrs Yasemin Leila Willis  
APPEAL REF(S): APP/D3505/C/25/3376611 & APP/D3505/C/25/3376612  
LOCAL PLANNING AUTHORITY: Babergh District Council  
APPEAL SITE: Land at 30 Edies Lane, Leavenheath, Suffolk

PROOF OF EVIDENCE  
OF  
**Chris Heard**

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I, **Chris Heard**, of Dubett, Ivy Lodge Road, Great Horkesley, CO6 4EN, STATE THAT:

- 1 I am a self-employed gardener trading as Insideout.
- 2 I make this statement in support of the appeals against the enforcement notice issued by Babergh District Council dated 17 November 2025 ("the EN").
- 3 I make this statement from matters within my own direct professional knowledge and involvement at the property.
- 4 I have worked at 30 Edies Lane from approximately October 2024 to the present day carrying out domestic garden maintenance

**Background**

- 5 When I first attended the property in 2024, the area forming part of the appeal site was already laid out, established and being used as part of the residential garden associated with the dwelling.
- 6 A photograph taken by me during the course of my maintenance work in October 2024, sent by WhatsApp message to Mr Adam Willis, shows the grassed and maintained condition of the garden area located to the rear of 30a Edies Lane and

- Kinnegar Edies Lane at that time. A copy of that image and accompanying message is produced at **Appendix CH-1**. It is my belief that this area of land is part of the garden and, owing to its condition, has been a part of the garden for many years.
- 7 Since 2024, I have regularly maintained that same area as part of the domestic garden land. My work has included mowing grassed areas, trimming hedges and shrubs, planting and maintaining hedges, and general garden maintenance typical of a residential garden. While some vegetation clearance was carried out within the adjoining woodland areas to manage overgrowth, the mowing and routine garden maintenance I undertook related only to the established garden area, which remained clearly defined and unchanged in extent. As a case in point, there is a clear distinction between land which has been laid to grass for a long time, as opposed to more recent land which has been seeded.
- 8 During the period I have worked at the property, the land I maintained has consistently appeared to be used as part of the residential garden associated with the dwelling.
- 9 The maintained garden area extended only to the point where the woodland began. The woodland area beyond that point was not maintained by me as part of the domestic garden and appeared overgrown and unmanaged.
- 10 The area which I have personally maintained as domestic garden land is shown on the plan attached at **Appendix CH-2**, which I have signed to confirm the area based on my own involvement at the site.

### **Conclusion / Summary**

- 11 Based on my professional involvement at the property, the land shown on the plan at **Appendix CH-2** has consistently functioned as part of the residential garden associated with the dwelling during the entire period I have worked there.



**EXHIBIT CH-1**

Referred to in the Proof of Evidence of  
**Chris Heard**

IN THE MATTER OF S174 TOWN & COUNTRY PLANNING ACT 1990  
RE: Appeal Against the Enforcement Notice dated 17 November 2025

APPEAL REF(S): APP/D3505/C/25/3376611 & APP/D3505/C/25/3376612

APPEAL SITE:  
Land at 30 Edies Lane, Leavenheath, Suffolk

Photograph taken October 2024 showing maintained grassed garden area,  
together with accompanying WhatsApp message

Dated: 24 February 2026

18:11

100%



Chris Gardener  
30/10/2024, 11:28



This over hang stuff shall i take out so when on  
mower will be easier ? Not mowing this bit but while  
i have saw



Reply



**EXHIBIT CH-2**

Referred to in the Proof of Evidence of  
**Chris Heard**

IN THE MATTER OF S174 TOWN & COUNTRY PLANNING ACT 1990  
RE: Appeal Against the Enforcement Notice dated 17 November 2025

APPEAL REF(S): APP/D3505/C/25/3376611 & APP/D3505/C/25/3376612

APPEAL SITE:

Land at 30 Edies Lane, Leavenheath, Suffolk

Plan identifying the maintained residential garden area  
Signed by Chris Heard

Dated:



Legend

 30 Edies Ln

Edies Ln

 30 Edies Ln

**30 EDIES LANE**

NAME Chris Heyerd

SIGNATURE 

DATE 24.2.26

