

DATED 12<sup>th</sup> December 2022

STATUTORY DECLARATION

OF

MICHELLE COTTRELL

I, MICHELLE COTTRELL of OAKTREE HOUSE, KERSWELL, CULLOMPTON, DEVON, EX15 2ES DO SOLEMNLY AND SINCERELY DECLARE as follows: -

- 1.0 My husband Matthew James Cottrell and I are the owners of Oaktree House and James Barn, Kerswell, EX15 2ES which has the title number DN470390 and which we have owned since 2009. A plan outlining the specific part of the property to which this declaration relates along with is provided as Exhibit "MC1".
- 2.0 My husband and I purchased the land with the specific intention of starting a free range poultry business and which we duly established, securing consent for the majority of the necessary buildings and infrastructure over a number of planning applications in 2009 and 2010 and constructing the main poultry housing shortly thereafter. For the first five years or so of the business we used a portacabin located on the site as an office and crew room but in 2015 around the same time as we were seeking consent for a farm dwelling we decided a purpose built structure would be more appropriate. Therefore, under application reference 15/2590/FUL we applied and secured consent for a replacement crew room and equipment store. As we were investing in other infrastructure on the farm we could not afford to erect the building immediately and it was finally finished in April 2017. From this point until around May 2018 we used the building as a farm office and crew room and provided as Exhibit "MC2" are two letters confirming this.
- 3.0 Whilst we found the crew room and office useful, by early 2018 we were starting to find that it was easier to keep any paperwork and have meetings in the farmhouse and that there was space in the control rooms of the poultry houses for changing etc and that a small timber structure that had been erected was sufficient to provide welfare space for staff. Needing a more effective use for the building and with it already having electricity and water supplies and foul drainage provisions connected we decided to convert it to a dwelling. The work to convert the structure, including making internal and external alterations was carried out in May/June 2018 and as evidence of this provided as Exhibit "MC3" are two invoices relating to this. The unit created provides a single bedroom, open plan kitchen and living space, bathroom and storage area. By early 2018 the building was ready for occupation and a floor plan of the unit and internal photographs showing the accommodation provided, which has not changed since 2018, are provided as Exhibit "MC4".

- 4.0 From July 2018 we have let the unit out to three different parties and provided as Exhibit "MC5" are letters from the different occupiers confirming their use and periods of occupancy and which confirm that the building has continuously been used as a dwelling. As further evidence of the letting of the building provided as Exhibit "MC6" are copies of spreadsheets we keep that confirm rental payments received in respect of the dwelling.
  
- 5.0 I can therefore confirm that the building and land edged red on the plan provided as Exhibit "MC1" has been used for residential occupation for a period exceeding four years.


AND I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

DECLARED by me  )  
)

At *Honiton*  )

In the County of *Devon* this )

*12* Day of *December* 2022 )

BEFORE ME   
*JOANNA KILBERT*

~~A COMMISSIONER FOR OATHS/SOLICITOR~~

**EVERYS**  
Solicitors  
**46 NEW STREET**  
**HONITON, DEVON**  
**EX14 1BY**

This is the Exhibit marked "MC1" referred to in the Statutory Declaration  
of Michelle Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



JOANNA KILGENT

**EVERYS**  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY

Solicitor/~~Commissioner for Oaths~~



**Promap**  
LANDMARK INFORMATION

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Licence number 100022432.  
Plotted Scale - 1:1250. Paper Size - A4

This is the Exhibit marked "MC2" referred to in the Statutory Declaration  
of Michelle Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



- *James Knight*

**EVERYS**  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY

Solicitor/~~Commissioner~~ for Oaths



SOUTH WEST DIVISION  
LLOYD MAUNDER ROAD  
WILLAND, CULLOMPTON  
DEVON, EX15 2PJ  
TEL: 01884 308799  
FAX: 01884 820525

October 2022

To Whom it May Concern

I am Chris Chater and I am a manager for Hook2Sisters, which is part of the 2 sisters food group. I first visited James Barn Poultry in 2011, when started my role at Hook2Sisters, and my last visit was in 2021 when poultry production ceased on site. During this time, I visited the site on frequent basis and at least once per quarter.

From my knowledge of the site I can confirm from the building outlined in red on the attached plan was built by early 2017 and I remember this clearly as prior to this, meetings & audits had been in one end of a poultry shed or the portacabin onsite. From around April 2017 to around June 2018 the building was used as the farm office and crew room and I recall having meetings & audits being carried out in the building on a number of occasions. I recall Mr and Mrs Cottrell telling me in early 2018 that to secure an additional income they wanted to convert the building into a small dwelling to let out and by mid that year the work had been carried out and we went back to having meetings in the poultry shed or in another timber structure, and occasionally in the farmhouse.

During my subsequent visits I was aware of the building being occupied as living accommodation but I am not aware of exactly who has lived in the property.

Yours faithfully

A solid black rectangular box used to redact the signature of Chris Chater.

Chris Chater  
General Manager



N Farley & Sons  
Contractors

October 2022

To Whom it May Concern

I am Neil Farley and I am a partner of N Farley & sons Agricultural contractors. I first visited James Barn Poultry in 2010, when Mr and Mrs Cottrell (the owners) first started running a poultry business from the site and my last visit was in 2021 when poultry production ceased. During this time, I visited the site approximately every 58 days, when the poultry sheds were emptied to remove the bedding & manure.

From my knowledge of the site I can confirm from the building outlined in red on the attached plan was built by early 2017 and I remember this clearly as prior to this, facilities had been in one end of a poultry shed or the portacabin onsite. From around April 2017 to around June 2018 the building was used as the farm office and crew room and I recall myself and my staff used it for their rest breaks and filling in paperwork. I also recall Mr and Mrs Cottrell telling me in early 2018 that to secure an additional income they wanted to convert the building into a small dwelling to let out and by mid that year the work had been carried out and we went back to using the area in the end of the poultry shed or in another timber structure.

During my subsequent visits I was aware of the building being occupied as living accommodation but I am not aware of exactly who has lived in the property.

Yours faithfully

A black rectangular redaction box covering the signature of Neil Farley.



**Tone Valley Services Ltd**  
Newlands House, Greenham, Wellington, Somerset TA21 0LZ  
Tel: 01823674315 Mob: [REDACTED]  
Email: office@tonevalleyservices.com  
www.tonevalleyservices.com  
VAT No: 152 882 300

October 2022

To Whom it May Concern

I am Nigel Howe and I am the owner of Tone Valley Services, a specialist poultry shed cleaning company. I first visited James Barn Poultry in 2010, when Mr and Mrs Cottrell (the owners) first started running a poultry business from the site and my last visit was in 2021 when poultry production ceased. During this time, I visited the site approximately every 58 days, when the poultry sheds were being prepared for a new flock.

From my knowledge of the site I can confirm from the building outlined in red on the attached plan was built by early 2017 and I remember this clearly as prior to this, meetings & facilities had been in one end of a poultry shed or the portacabin onsite. From around April 2017 to around June 2018 the building was used as the farm office and crew room and I recall having meetings in the building on a number of occasions, and my staff used it for their rest breaks & changing. I also recall Mr and Mrs Cottrell telling me in early 2018 that to secure an additional income they wanted to convert the building into a small dwelling to let out and by mid that year the work had been carried out and we went back to using the area in the end of the poultry shed or in another timber structure.

During my subsequent visits I was aware of the building being occupied as living accommodation but I am not aware of exactly who has lived in the property.

Yours faithfully

A large black rectangular redaction box covering the signature of Nigel Howe.

This is the Exhibit marked "MC3" referred to in the Statutory Declaration  
of Michelle Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



JANNA KILGAT

**EVERYS**  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY

Solicitor/Commissioner for Oaths

R W Hammett Electrical Limited  
Layton  
Westleigh, Tiverton  
Devon  
EX16 7EP  
VAT Registration No.: 139784564



## VAT Invoice

**INVOICE TO**  
Mr Matthew Cottrell  
James Barn Poultry  
James Barn  
Kerswell  
Cullompton  
Devon  
EX15 2ES

**INVOICE NO.** 1813  
**DATE** 30/06/2018  
**DUE DATE** 30/06/2018  
**TERMS** Due on receipt

ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
	Electrical works to convert existing poultry office to dwelling.			
<b>Services</b>		1	1,897.00	1,897.00

\*\*\*\*ALL CHEQUES MUST BE MADE PAYABLE TO  
R W HAMMETT ELECTRICAL LIMITED\*\*\*\*\*BACS: R W Hammett  
Electrical Limited 30-90-49, Account number 55018568

SUBTOTAL 1,897.00  
VAT TOTAL 379.40  
TOTAL 2,276.40  
BALANCE DUE **£2,276.40**

### VAT SUMMARY

	RATE	VAT	NET
VAT @ 20%		379.40	1,897.00

T: +44 (0) 1823 672942 | M: +44 (0) [REDACTED] | E: rwhammettelectrical@gmail.com

BACS: R W Hammett Electrical Limited 30-90-49, Account number 55018568

All materials supplied remain the property of R W Hammett Electrical until payment has been received. Payment due with 30 days.

Invoice 01858

## **Stag Construction South West Ltd**

The Toll House  
Rackenford  
Tiverton  
Devon  
EX16 8EH

Tel 01884 881361

30/June/2018

Mr & Mrs Cotterell,  
James Barn  
Kerswell  
Cullompton  
EX15 2ES

**For**

Works to convert existing poultry office to dwelling as per your instructions.

Agreed price £7876.00

VAT           £1575.20

**TOTAL       £9451.20**

**As works now fully completed, payment by return please**

Make all cheques payable to Stag Construction South West Limited  
BACS Barclays sort code 20 85 26 account no 10683302

VAT no: 267 4948 42

This is the Exhibit marked "MC4" referred to in the Statutory Declaration  
of Michelle Cottrell

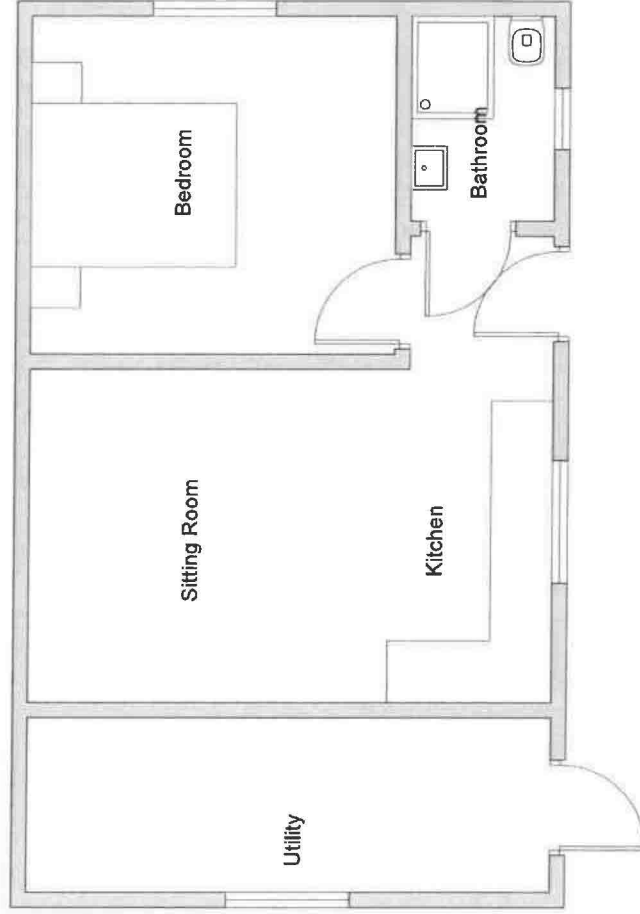
DATED THIS 12<sup>th</sup> day of December 2022



- JANA KNIGHT

**EVERYS  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY**

~~Solicitor/Commissioner for Oaths~~



Ground floor plan

0m 1:50@A3 5M

Client: Mr M Cottrell

Address:

Post Code:

Project no.: Nove

Drawn by: JA

Checked by: AS

Project: New dwelling

Grid Ref:-

Scale: 1:50

Date: November 2022

Title: Block Plan

P01

Dwg No.

Rev.

Dwg Status: Planning

STAGE: PLANNING DESIGN ARCHITECTURAL SERVICES

T 01 01 419045 - Contact: 01462 419045 - Email: info@stags.co.uk



STAGS











This is the Exhibit marked "MC5" referred to in the Statutory Declaration  
of Michelle Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



*Jonathan Knight*

**EVERYS  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY**

Solicitor/~~Commissioner for Oaths~~

Mr P Wasiolek

October 2022

To Whom it May Concern

I am Piotr Wasiolek and I live at The Keepers Cottage Inn, Kentisbeare.

I can confirm that from early July 2018 to late April 2019 I lived in the building outlined in red on the attached plan which is located at Oaktree House, Kerswell, Cullompton EX15 2ES.

The accommodation provided; a single bedroom, open plan kitchen and living space, bathroom and storage area.

I can confirm that I lived in the building on full time basis as my sole residence.

During my occupation my rent was paid directly to Mr and Mrs Cottrell the owners of Oaktree House by my employer Mr A Persey, owner of the Keepers Cottage, Kentisbeare, a pub where I am a chef.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

---

Mrs T Midgley

October 2022

To Whom it May Concern


I am Tracy Midgley and I live at Bullfinch Close, Cullompton

I can confirm that from early May 2019 to mid October 2019 I lived in the building outlined in red on the attached plan which is located at Oaktree House, Kerswell, Cullompton EX15 2ES. The accommodation provided; a single bedroom, open plan kitchen and living space, bathroom and storage area.

I can confirm that I lived in the building on full time basis as my sole residence.

During my occupation I paid rent directly to Mr and Mrs Cottrell the owners of Oaktree House.

Yours faithfully,

A solid black rectangular box redacting the signature of Tracy Midgley.

Mr J Fishwick

October 2022

To Whom it May Concern

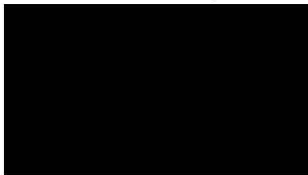
I am Joe Fishwick and I live with my partner Naomi Cottrell at Oaktree House, Kerswell, Cullompton EX15 2ES.

I can confirm that we took occupation of the building outlined in red on the attached plan and which is located at Oaktree House, Kerswell, Cullompton EX15 2ES on 19<sup>th</sup> October 2019. The accommodation provides; a single bedroom, open plan kitchen and living space, bathroom and storage area.

I can confirm that we have lived in the building on full time basis as our sole residence since taking first occupation and we continue to live there at the time of writing.

We pay rent directly to Mr and Mrs Cottrell the owners of Oaktree House and this includes a contribution towards utilities.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

This is the Exhibit marked "MC6" referred to in the Statutory Declaration  
of Michelle Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



JOANNA KNIGHT

Solicitor/~~Commissioner for Oaths~~

**EVERYS**  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY



**Pete £100 per week**  
**Moved in Monday 02/07/18**

w/c	Amount	Payments Rcvd	Date paid
02/07/2018	£100.00		
09/07/2018	£100.00		
16/07/2018	£100.00		
23/07/2018	£100.00		
30/07/2018	£100.00	£500.00	31/08/2018
06/08/2018	£100.00		
13/08/2018	£100.00		
20/08/2018	£100.00		
27/08/2018	£100.00	£400.00	01/10/2018
03/09/2018	£100.00		
10/09/2018	£100.00		
17/09/2018	£100.00		
24/09/2018	£100.00	£400.00	30/10/2018
01/10/2018	£100.00		
08/10/2018	£100.00		
15/10/2018	£100.00		
22/10/2018	£100.00		
29/10/2018	£100.00	£500.00	20/11/2018
05/11/2018	£100.00		
12/11/2018	£100.00		
19/11/2018	£100.00		
26/11/2018	£100.00	£400.00	31/12/2018
03/12/2018	£100.00		
10/12/2018	£100.00		
17/12/2018	£100.00		
24/12/2018	£100.00		
31/12/2018	£100.00		
07/01/2019	£100.00	£600.00	07/02/2019
14/01/2019	£100.00		
21/01/2019	£100.00		
28/01/2019	£100.00		
04/02/2019	£100.00	£400.00	28/02/2019
11/02/2019	£100.00		
18/02/2019	£100.00		
25/02/2019	£100.00		
04/03/2019	£100.00		
11/03/2019	£100.00	£600.00	15/03/2019
18/03/2019	£100.00		
25/03/2019	£100.00		
01/04/2019	£100.00		
08/04/2019	£100.00		
15/04/2019	£100.00		
22/04/2019	£100.00	£400.00	29/04/2019 moved out 29/04/2019
BT (see attached sheet)	£134.62	£134.62	07/02/2019 **total paid 07/02= £789.63
Gas Bottle	£60.00	£55.01	07/02/2019
Gas Bottle	£60.00		
Gas Bottle	£60.00		
BT	£24.99	£249.98	29/04/2019

**Tracy £100 per week**  
**Moved in Monday 4th May 2019**

<b>w/c</b>	<b>Amount</b>	<b>Payments Rcvd</b>	<b>Date paid</b>
04/05/2019	£100.00		
11/05/2019	£100.00		
18/05/2019	£100.00	£300.00	28/05/2019
25/05/2019	£100.00	£100.00	03/06/2019
01/06/2019	£100.00		
08/06/2019	£100.00	£400.00	09/06/2019
15/06/2019	£100.00		
22/06/2019	£100.00		
29/06/2019	£100.00		
06/07/2019	£100.00	£400.00	10/07/2019
13/07/2019	£100.00		
20/07/2019	£100.00		
27/07/2019	£100.00		
03/08/2019	£100.00	£500.00	05/08/2019
10/08/2019	£100.00		
17/08/2019	£100.00		
24/08/2019	£100.00		
31/08/2019	£100.00	£400.00	06/09/2019
07/09/2019	£100.00		
14/09/2019	£100.00		
21/09/2019	£100.00		
28/09/2019	£100.00		
05/10/2019	£100.00	£300.00	05/10/2019
12/10/2019	£100.00		Moved out 19/10/2019
Gas Bottle	£55.00	£55.00	30/06/2019
Gas Bottle	£55.00	£55.00	13/08/2019
BT may	£25.00	£25.00	04/05/2019
BT june	£25.00	£25.00	10/06/2019
BT july	£25.00	£25.00	03/07/2019
BT aug	£25.00	£25.00	05/08/2019
BT sept	£25.00	£25.00	06/09/2019
BT oct	£25.00	£25.00	05/10/2019

**Naomi & Joe £400 per month**  
**Moved in Monday 19th October 2019**

w/c	Amount	Payments Rcvd	Date paid	Gas
Oct'19	£200.00	£200.00	19/10/2019	
Nov'19	£400.00	£400.00	06/11/2019	
Dec'19	£400.00	£400.00	03/12/2019	
Jan'20	£400.00	£400.00	23/12/2019	
Feb'20	£400.00	£400.00	31/01/2020	£50.00 20/02/2020
Mar'20	£400.00	£400.00	01/03/2020	
Apr'20	£400.00	£400.00	09/04/2020	
May'20	£400.00	£400.00	28/05/2020	£50.00 28/05/2020
Jun'20	£400.00	£400.00	12/06/2020	
Jul'20	£400.00	£400.00	02/07/2020	
Aug'20	£400.00	£400.00	02/08/2020	
Sept'20	£400.00	£400.00	03/09/2020	
Oct'20	£400.00	£400.00	01/10/2020	
Nov'20	£400.00	£400.00	04/11/2020	
Dec'20	£400.00	£400.00	05/12/2020	
Jan'21	£400.00	£400.00	09/01/2021	
Feb'21	£400.00	£400.00	02/02/2021	
Mar'21	£400.00	£400.00	12/03/2021	£50.00 12/03/2021
Apr'21	£400.00	£400.00	07/04/2021	
May'21	£400.00	£400.00	05/05/2021	£50.00 28/05/2021
Jun'21	£400.00	£400.00	29/05/2021	
Jul'21	£400.00	£400.00	08/07/2021	
Aug'21	£400.00	£400.00	30/07/2021	
Sept'21	£400.00	£400.00	02/09/2021	
Oct'21	£400.00	£400.00	30/09/2021	£50.00 02/09/2021
Nov'21	£400.00	£400.00	01/11/2021	
Dec'21	£400.00	£400.00	04/12/2021	£50.00 04/12/2021
Jan'22	£400.00	£400.00	02/01/2022	£50.00 02/01/2022
Feb'22	£400.00	£400.00	07/02/2022	
Mar'22	£400.00	£400.00	01/03/2022	£50.00 01/03/2022
Apr'22	£400.00	£400.00	03/04/2022	£50.00 31/03/2022
May'22	£400.00	£400.00	30/04/2022	
Jun'22	£400.00	£400.00	02/06/2022	
Jul'22	£400.00	£400.00	01/07/2022	
Aug'22	£400.00	£400.00	01/08/2022	
Sept'22	£400.00	£400.00	31/08/2022	£50.00 30/09/2022
Oct'22	£400.00	£400.00	01/10/2022	



DATED *12<sup>th</sup> December* 2022

STATUTORY DECLARATION

OF

MATTHEW JAMES COTTRELL

I, MATTHEW JAMES COTTRELL of OAKTREE HOUSE, KERSWELL, CULLOMPTON, DEVON, EX15 2ES DO SOLEMNLY AND SINCERELY DECLARE as follows: -

- 1.0 My wife Michelle Cottrell and I are the owners of Oaktree House and James Barn, Kerswell, EX15 2ES which has the title number DN470390 and which we have owned since 2009. A plan outlining the specific part of the property to which this declaration relates along with is provided as Exhibit "MJC1".
- 2.0 My husband and I purchased the land with the specific intention of starting a free range poultry business and which we duly established, securing consent for the majority of the necessary buildings and infrastructure over a number of planning applications in 2009 and 2010 and constructing the main poultry housing shortly thereafter. For the first five years or so of the business we used a portacabin located on the site as an office and crew room but in 2015 around the same time as we were seeking consent for a farm dwelling we decided a purpose built structure would be more appropriate. Therefore, under application reference 15/2590/FUL we applied and secured consent for a replacement crew room and equipment store. As we were investing in other infrastructure on the farm we could not afford to erect the building immediately and it was finally finished in April 2017. From this point until around May 2018 we used the building as a farm office and crew room and provided as Exhibit "MJC2" are two letters confirming this.
- 3.0 Whilst we found the crew room and office useful, by early 2018 we were starting to find that it was easier to keep any paperwork and have meetings in the farmhouse and that there was space in the control rooms of the poultry houses for changing etc and that a small timber structure that had been erected was sufficient to provide welfare space for staff. Needing a more effective use for the building and with it already having electricity and water supplies and foul drainage provisions connected we decided to convert it to a dwelling. The work to convert the structure, including making internal and external alterations was carried out in May/June 2018 and as evidence of this provided as Exhibit "MJC3" are two invoices relating to this. The unit created provides a single bedroom, open plan kitchen and living space, bathroom and storage area. By early 2018 the building was ready for occupation and a floor plan of the unit and internal photographs showing the accommodation provided, which has not changed since 2018, are provided as Exhibit "MJC4".

- 4.0 From July 2018 we have let the unit out to three different parties and provided as Exhibit "MJC5" are letters from the different occupiers confirming their use and periods of occupancy and which confirm that the building has continuously been used as a dwelling. As further evidence of the letting of the building provided as Exhibit "MJC6" are copies of spreadsheets we keep that confirm rental payments received in respect of the dwelling.
- 5.0 I can therefore confirm that the building and land edged red on the plan provided as Exhibit "MJC1" has been used for residential occupation for a period exceeding four years.

AND I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

DECLARED by me



)  
)

At

*Honiton*

)

In the County of *Devon* this

)

Day of *12 Dec* 2022

)

BEFORE ME



*- Joanna Wright*

A COMMISSIONER FOR OATHS/SOLICITOR

**EVERYS**  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY



This is the Exhibit marked "MJC1" referred to in the Statutory Declaration  
of Matthew James Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



- *Isabella Knight*

Solicitor/~~Commissioner for Oaths~~



**Promap**  
LANDMARK INFORMATION

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Licence number 100022432.  
Plotted Scale - 1:1250. Paper Size - A4

This is the Exhibit marked "MJC2" referred to in the Statutory Declaration  
of Matthew James Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



- JONNA KNIGHT

**EVERYS  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY**

Solicitor/Commissioner for Oaths



**Tone Valley Services Ltd**  
Newlands House, Greenham, Wellington, Somerset TA21 0LZ  
Tel: 01823674315 Mob: [REDACTED]  
Email: office@tonevalleyservices.com  
www.tonevalleyservices.com  
VAT No: 152 882 300

October 2022

To Whom it May Concern

I am Nigel Howe and I am the owner of Tone Valley Services, a specialist poultry shed cleaning company. I first visited James Barn Poultry in 2010, when Mr and Mrs Cottrell (the owners) first started running a poultry business from the site and my last visit was in 2021 when poultry production ceased. During this time, I visited the site approximately every 58 days, when the poultry sheds were being prepared for a new flock.

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Yours faithfully

A solid black rectangular box used to redact the signature of Nigel Howe.



SOUTH WEST DIVISION  
LLOYD MAUNDER ROAD  
WILLAND, CULLOMPTON  
DEVON, EX15 2PJ  
TEL: 01884 308799  
FAX: 01884 820525

October 2022

To Whom it May Concern

I am Chris Chater and I am a manager for Hook2Sisters, which is part of the 2 sisters food group. I first visited James Barn Poultry in 2011, when started my role at Hook2Sisters, and my last visit was in 2021 when poultry production ceased on site. During this time, I visited the site on frequent basis and at least once per quarter.

From my knowledge of the site I can confirm from the building outlined in red on the attached plan was built by early 2017 and I remember this clearly as prior to this, meetings & audits had been in one end of a poultry shed or the portacabin onsite. From around April 2017 to around June 2018 the building was used as the farm office and crew room and I recall having meetings & audits being carried out in the building on a number of occasions. I recall Mr and Mrs Cottrell telling me in early 2018 that to secure an additional income they wanted to convert the building into a small dwelling to let out and by mid that year the work had been carried out and we went back to having meetings in the poultry shed or in another timber structure, and occasionally in the farmhouse.

During my subsequent visits I was aware of the building being occupied as living accommodation but I am not aware of exactly who has lived in the property.

Yours faithfully

[Redacted signature]

Chris Chater  
General Manager

N Farley & Sons  
Contractors

October 2022

To Whom it May Concern

I am Neil Farley and I am a partner of N Farley & sons Agricultural contractors. I first visited James Barn Poultry in 2010, when Mr and Mrs Cottrell (the owners) first started running a poultry business from the site and my last visit was in 2021 when poultry production ceased. During this time, I visited the site approximately every 58 days, when the poultry sheds were emptied to remove the bedding & manure.

From my knowledge of the site I can confirm from the building outlined in red on the attached plan was built by early 2017 and I remember this clearly as prior to this, facilities had been in one end of a poultry shed or the portacabin onsite. From around April 2017 to around June 2018 the building was used as the farm office and crew room and I recall myself and my staff used it for their rest breaks and filling in paperwork. I also recall Mr and Mrs Cottrell telling me in early 2018 that to secure an additional income they wanted to convert the building into a small dwelling to let out and by mid that year the work had been carried out and we went back to using the area in the end of the poultry shed or in another timber structure.

During my subsequent visits I was aware of the building being occupied as living accommodation but I am not aware of exactly who has lived in the property.

Yours faithfully

A solid black rectangular box used to redact the signature of Neil Farley.

This is the Exhibit marked "MJC3" referred to in the Statutory Declaration  
of Matthew James Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



- JOANNA KNIGHT

EVERYS  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY

Solicitor/~~Commissioner for Oaths~~

R W Hammett Electrical Limited  
Layton  
Westleigh, Tiverton  
Devon  
EX16 7EP  
VAT Registration No.: 139784564



## VAT Invoice

**INVOICE TO**  
Mr Matthew Cottrell  
James Barn Poultry  
James Barn  
Kerswell  
Cullompton  
Devon  
EX15 2ES

**INVOICE NO.** 1813  
**DATE** 30/06/2018  
**DUE DATE** 30/06/2018  
**TERMS** Due on receipt

ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
	Electrical works to convert existing poultry office to dwelling.			
<b>Services</b>		1	1,897.00	1,897.00
****ALL CHEQUES MUST BE MADE PAYABLE TO R W HAMMETT ELECTRICAL LIMITED*****BACS: R W Hammett Electrical Limited 30-90-49, Account number 55018568		<b>SUBTOTAL</b>		1,897.00
		<b>VAT TOTAL</b>		379.40
		<b>TOTAL</b>		2,276.40
		<b>BALANCE DUE</b>		<b>£2,276.40</b>

### VAT SUMMARY

	RATE	VAT	NET
VAT @ 20%		379.40	1,897.00

T: +44 (0) 1823 672942 | M: +44 (0) [REDACTED] | E: rwhammettelectrical@gmail.com  
BACS: R W Hammett Electrical Limited 30-90-49, Account number 55018568

All materials supplied remain the property of R W Hammett Electrical until payment has been received. Payment due with 30 days.



Invoice 01858

## **Stag Construction South West Ltd**

The Toll House  
Rackenford  
Tiverton  
Devon  
EX16 8EH

Tel 01884 881361

30/June/2018

Mr & Mrs Cotterell,  
James Barn  
Kerswell  
Cullompton  
EX15 2ES

**For**

Works to convert existing poultry office to dwelling as per your instructions.

Agreed price £7876.00

VAT           £1575.20

**TOTAL       £9451.20**

**As works now fully completed, payment by return please**

Make all cheques payable to Stag Construction South West Limited  
BACS Barclays sort code 20 85 26 account no 10683302

VAT no: 267 4948 42

This is the Exhibit marked "MJC4" referred to in the Statutory Declaration  
of Matthew James Cottrell

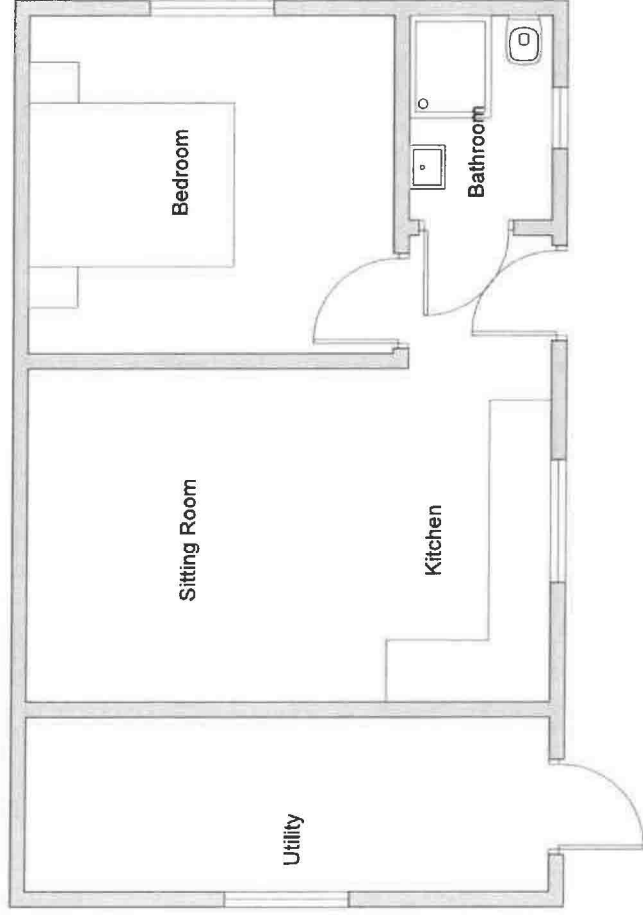
DATED THIS 12<sup>th</sup> day of December, 2022



JANNA KULANT

EVERYS  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY

Solicitor/Commissioner for Oaths



Ground floor plan

0m 1.50m 5M

Client: **Mr M Cottrell**  
 Address: \*  
 Post Code: \*  
 Project no: **Novo**  
 Drawn by: **JA**  
 Checked by: **AS**

Project: **New dwelling**  
 Grid Ref: \*  
 Scale: **1:50**  
 Date: **November 2022**

Title: **Block Plan**  
 Dwg Status: **Planning**

Dwg No. **P01**  
 Rev. **-**











This is the Exhibit marked "MJC5" referred to in the Statutory Declaration  
of Matthew James Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



— JOANNA KILGAT

**EVERYS**  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY

Solicitor/~~Commissioner for Oaths~~



Mr P Wasiolek

October 2022

To Whom it May Concern

I am Piotr Wasiolek and I live at The Keepers Cottage Inn, Kentisbeare.

I can confirm that from early July 2018 to late April 2019 I lived in the building outlined in red on the attached plan which is located at Oaktree House, Kerswell, Cullompton EX15 2ES.

The accommodation provided; a single bedroom, open plan kitchen and living space, bathroom and storage area.

I can confirm that I lived in the building on full time basis as my sole residence.

During my occupation my rent was paid directly to Mr and Mrs Cottrell the owners of Oaktree House by my employer Mr A Persey, owner of the Keepers Cottage, Kentisbeare, a pub where I am a chef.

Yours faithfully

A black rectangular redaction box covering the signature of the sender.

---

Mrs T Midgley

October 2022

To Whom it May Concern

I am Tracy Midgley and I live at Bullfinch Close, Cullompton

I can confirm that from early May 2019 to mid October 2019 I lived in the building outlined in red on the attached plan which is located at Oaktree House, Kerswell, Cullompton EX15 2ES. The accommodation provided; a single bedroom, open plan kitchen and living space, bathroom and storage area.

I can confirm that I lived in the building on full time basis as my sole residence.

During my occupation I paid rent directly to Mr and Mrs Cottrell the owners of Oaktree House.

Yours faithfully

A black rectangular redaction box covering the signature of Tracy Midgley.

Mr J Fishwick

October 2022

To Whom it May Concern

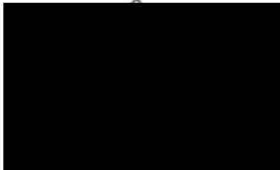
I am Joe Fishwick and I live with my partner Naomi Cottrell at Oaktree House, Kerswell, Cullompton EX15 2ES.

I can confirm that we took occupation of the building outlined in red on the attached plan and which is located at Oaktree House, Kerswell, Cullompton EX15 2ES on 19<sup>th</sup> October 2019. The accommodation provides; a single bedroom, open plan kitchen and living space, bathroom and storage area.

I can confirm that we have lived in the building on full time basis as our sole residence since taking first occupation and we continue to live there at the time of writing.

We pay rent directly to Mr and Mrs Cottrell the owners of Oaktree House and this includes a contribution towards utilities.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

This is the Exhibit marked "MJC6" referred to in the Statutory Declaration  
of Matthew James Cottrell

DATED THIS 12<sup>th</sup> day of December 2022



- JONNA KNIGHT

**EVERYS**  
Solicitors  
46 NEW STREET  
HONITON, DEVON  
EX14 1BY

Solicitor/Commissioner for Oaths

**Pete £100 per week**  
**Moved in Monday 02/07/18**

w/c	Amount	Payments Rcvd	Date paid
02/07/2018	£100.00		
09/07/2018	£100.00		
16/07/2018	£100.00		
23/07/2018	£100.00		
30/07/2018	£100.00	£500.00	31/08/2018
06/08/2018	£100.00		
13/08/2018	£100.00		
20/08/2018	£100.00		
27/08/2018	£100.00	£400.00	01/10/2018
03/09/2018	£100.00		
10/09/2018	£100.00		
17/09/2018	£100.00		
24/09/2018	£100.00	£400.00	30/10/2018
01/10/2018	£100.00		
08/10/2018	£100.00		
15/10/2018	£100.00		
22/10/2018	£100.00		
29/10/2018	£100.00	£500.00	20/11/2018
05/11/2018	£100.00		
12/11/2018	£100.00		
19/11/2018	£100.00		
26/11/2018	£100.00	£400.00	31/12/2018
03/12/2018	£100.00		
10/12/2018	£100.00		
17/12/2018	£100.00		
24/12/2018	£100.00		
31/12/2018	£100.00		
07/01/2019	£100.00	£600.00	07/02/2019
14/01/2019	£100.00		
21/01/2019	£100.00		
28/01/2019	£100.00		
04/02/2019	£100.00	£400.00	28/02/2019
11/02/2019	£100.00		
18/02/2019	£100.00		
25/02/2019	£100.00		
04/03/2019	£100.00		
11/03/2019	£100.00	£600.00	15/03/2019
18/03/2019	£100.00		
25/03/2019	£100.00		
01/04/2019	£100.00		
08/04/2019	£100.00		
15/04/2019	£100.00		
22/04/2019	£100.00	£400.00	29/04/2019 moved out 29/04/2019
BT (see attached sheet)	£134.62	£134.62	07/02/2019 **total paid 07/02=£789.63
Gas Bottle	£60.00	£55.01	07/02/2019
Gas Bottle	£60.00		
Gas Bottle	£60.00		
BT	£24.99	£249.98	29/04/2019

**Tracy £100 per week**  
**Moved in Monday 4th May 2019**

w/c	Amount	Payments Rcvd	Date paid
04/05/2019	£100.00		
11/05/2019	£100.00		
18/05/2019	£100.00	£300.00	28/05/2019
25/05/2019	£100.00	£100.00	03/06/2019
01/06/2019	£100.00		
08/06/2019	£100.00	£400.00	09/06/2019
15/06/2019	£100.00		
22/06/2019	£100.00		
29/06/2019	£100.00		
06/07/2019	£100.00	£400.00	10/07/2019
13/07/2019	£100.00		
20/07/2019	£100.00		
27/07/2019	£100.00		
03/08/2019	£100.00	£500.00	05/08/2019
10/08/2019	£100.00		
17/08/2019	£100.00		
24/08/2019	£100.00		
31/08/2019	£100.00	£400.00	06/09/2019
07/09/2019	£100.00		
14/09/2019	£100.00		
21/09/2019	£100.00		
28/09/2019	£100.00		
05/10/2019	£100.00	£300.00	05/10/2019
12/10/2019	£100.00		Moved out 19/10/2019
Gas Bottle	£55.00	£55.00	30/06/2019
Gas Bottle	£55.00	£55.00	13/08/2019
BT may	£25.00	£25.00	04/05/2019
BT june	£25.00	£25.00	10/06/2019
BT july	£25.00	£25.00	03/07/2019
BT aug	£25.00	£25.00	05/08/2019
BT sept	£25.00	£25.00	06/09/2019
BT oct	£25.00	£25.00	05/10/2019

**Naomi & Joe £400 per month**  
**Moved in Monday 19th October 2019**

w/c	Amount	Payments Rcvd	Date paid	Gas
Oct'19	£200.00	£200.00	19/10/2019	
Nov'19	£400.00	£400.00	06/11/2019	
Dec'19	£400.00	£400.00	03/12/2019	
Jan'20	£400.00	£400.00	23/12/2019	
Feb'20	£400.00	£400.00	31/01/2020	£50.00 20/02/2020
Mar'20	£400.00	£400.00	01/03/2020	
Apr'20	£400.00	£400.00	09/04/2020	
May'20	£400.00	£400.00	28/05/2020	£50.00 28/05/2020
Jun'20	£400.00	£400.00	12/06/2020	
Jul'20	£400.00	£400.00	02/07/2020	
Aug'20	£400.00	£400.00	02/08/2020	
Sept'20	£400.00	£400.00	03/09/2020	
Oct'20	£400.00	£400.00	01/10/2020	
Nov'20	£400.00	£400.00	04/11/2020	
Dec'20	£400.00	£400.00	05/12/2020	
Jan'21	£400.00	£400.00	09/01/2021	
Feb'21	£400.00	£400.00	02/02/2021	
Mar'21	£400.00	£400.00	12/03/2021	£50.00 12/03/2021
Apr'21	£400.00	£400.00	07/04/2021	
May'21	£400.00	£400.00	05/05/2021	£50.00 28/05/2021
Jun'21	£400.00	£400.00	29/05/2021	
Jul'21	£400.00	£400.00	08/07/2021	
Aug'21	£400.00	£400.00	30/07/2021	
Sept'21	£400.00	£400.00	02/09/2021	
Oct'21	£400.00	£400.00	30/09/2021	£50.00 02/09/2021
Nov'21	£400.00	£400.00	01/11/2021	
Dec'21	£400.00	£400.00	04/12/2021	£50.00 04/12/2021
Jan'22	£400.00	£400.00	02/01/2022	£50.00 02/01/2022
Feb'22	£400.00	£400.00	07/02/2022	
Mar'22	£400.00	£400.00	01/03/2022	£50.00 01/03/2022
Apr'22	£400.00	£400.00	03/04/2022	£50.00 31/03/2022
May'22	£400.00	£400.00	30/04/2022	
Jun'22	£400.00	£400.00	02/06/2022	
Jul'22	£400.00	£400.00	01/07/2022	
Aug'22	£400.00	£400.00	01/08/2022	
Sept'22	£400.00	£400.00	31/08/2022	£50.00 30/09/2022
Oct'22	£400.00	£400.00	01/10/2022	