

PROOF OF EVIDENCE OF ASIF CHAUDHERY

(on behalf of Serenity Welfare)

Appeal References: APP/W1905/C/26/3378144 & 3378145

Site: Darcy's Place / Little Broomfield, Church Lane, Wormley

1. Witness Details

1.1 My name is Asif Chaudhery. I am Head of Legal and a member of the Senior Management Team at Serenity Welfare.

1.2 Serenity Welfare operates from premises directly opposite the appeal site on Church Lane, Wormley.

1.3 My responsibilities include oversight of legal compliance, safeguarding frameworks, and operational risk within the organisation.

1.4 The evidence I provide is based on my direct knowledge of the site and its impact on our operations.

2. Introduction and Background

2.1 I provide this evidence on behalf of Serenity Welfare because our premises are located directly opposite the appeal site and our organisation has been directly affected by the activities taking place there. My evidence is not intended to repeat the Council's planning case or to provide expert planning evidence. Rather, it is intended to assist the Inspector by explaining, from the perspective of an immediately affected neighbouring occupier, what has been observed from our premises and the practical impact those activities have had on our organisation.

2.2 Serenity Welfare operates in a sensitive environment. We provide structured support to vulnerable individuals, including children and young people, and our premises are used by staff, professionals, and service users in connection with that work. The nature of our operations means that environmental stability, safety, and the maintenance of a calm and professional setting are important parts of our day-to-day functioning.

2.3 The appeal site is not a distant or abstract location in relation to Serenity Welfare. It sits directly opposite our premises on Church Lane. Activity on the site is therefore visible to us and, when that activity generates smoke, ash, noise, vehicle movements, or other disturbance, the impact is experienced directly by our staff and by the organisation as a whole.

2.4 For that reason, Serenity Welfare's interest in this appeal is not a general objection to development, nor is it based on speculation. It arises from what we have seen and experienced over a sustained period. The evidence below sets out those observations and explains why, from our position, the activity at the site has caused real operational and environmental concern.

2.5 I appreciate that the Planning Inspectorate will already be familiar with the appeal background, the Enforcement Notice, and the Council's formal planning position. I have therefore sought to keep my evidence focused on matters within my own knowledge, namely Serenity Welfare's location, the nature of our operations, our observations of the appeal site, and the practical impact of the activities taking place there.

3. Observations of Activity on Site

3.1 Since approximately late 2024 and throughout 2025–2026, Serenity Welfare has observed consistent and repeated activity taking place at the appeal site. This has included the delivery and movement of materials, the use of plant and machinery, the accumulation and stockpiling of material, and instances of burning. These observations have been made from our premises, which are directly opposite the site, and therefore the activity has been readily visible to staff and management during the ordinary course of our working day.

3.2 The activities have not appeared to be isolated, occasional, or incidental. Rather, they have taken place over an extended period and with notable intensity. The pattern of activity has given the impression of an ongoing operation, with materials being brought onto the site, moved around the site, and retained there. From our perspective as a neighbouring occupier, this has created a continuing presence and level of activity which is materially different from what one would expect from short-term, limited or minor works.

3.3 The scale, duration and nature of what has been observed strongly resemble ongoing operational use of the site rather than limited restoration works. In particular, the repeated movement of materials, the visible use of machinery, the stockpiling of material and the burning activity have all contributed to the impression that the site is being used actively and continuously. This is relevant to Serenity Welfare because the activity is not hidden or remote; it is directly opposite our premises and forms part of the daily environment in which our staff and service users are required to operate.

4. Environmental and Operational Impact

4.1 The activities on site have had direct and tangible effects on Serenity Welfare because of the close proximity of our premises to the appeal site. The impact has not been abstract or limited to visual concern. It has been experienced in the ordinary operation of our organisation, including by staff who work from the premises and who are required to maintain a safe, calm and professional environment for the individuals we support.

4.2 The effects have included smoke, ash deposition, noise, visual disturbance and general disruption to the environment around our premises. On occasions when burning has taken place, smoke and ash have been of particular concern because they affect the immediate surroundings and create an environment which is inconsistent with the setting we are required to provide. The presence of machinery, material movements and stockpiles has also contributed to an unsettled and industrial character directly opposite our premises.

4.3 These impacts have affected day-to-day operations by creating avoidable disturbance and uncertainty in the working environment. Serenity Welfare is not operating in a detached commercial setting where such impacts can simply be ignored. Our premises support sensitive work and our staff are required to manage a professional environment for vulnerable individuals. Where smoke, ash, noise or visible site activity affects that environment, it has a practical operational consequence and increases the burden on staff to maintain normality and reassurance within the premises.

5. Safeguarding Context

5.1 Serenity Welfare provides services to vulnerable individuals, including children and young people. The nature of this work means that our premises are not simply ordinary

office accommodation. They form part of a wider safeguarding environment in which staff are expected to provide structure, reassurance and stability to individuals who may already be experiencing significant vulnerability, distress or uncertainty.

5.2 In that context, environmental stability and safety are fundamental. A calm, predictable and professionally managed setting is an important part of reducing anxiety, maintaining appropriate boundaries and supporting staff to respond effectively to the needs of the individuals in our care. External disruption can therefore have a greater practical impact in our setting than it might have in an ordinary commercial environment.

5.3 The activities described above are incompatible with that environment. Smoke, ash, noise, machinery, vehicle movements and visible stockpiling directly opposite our premises undermine the sense of stability and safety that we are required to maintain. They also create additional pressure on staff, who must manage any concern, disruption or environmental impact while continuing to deliver services to vulnerable individuals in a safe and professional manner.

6. Planning Context

6.1 Based on Council evidence, the site was previously restored and current activity is not justified by historic permissions.

6.2 Observations from our premises support this conclusion.

7. Character of Area

7.1 The scale of activity is out of character with surrounding uses.

8. Overall Position

8.1 Serenity Welfare's overall position is that the activities observed at the appeal site are ongoing, impactful and inconsistent with what would ordinarily be understood as limited restoration activity. The duration, frequency and nature of the activity, including the movement and stockpiling of materials, use of machinery and burning, have created a continuing operational presence directly opposite our premises. From our perspective, this has not appeared to be a short-term or incidental matter, but a sustained use of the site with real consequences for the neighbouring environment.

8.2 Continued activity of this nature would result in ongoing harm to Serenity Welfare. That harm is not limited to inconvenience or disagreement with the use of the land. It arises from the practical impact of smoke, ash, noise, visual disturbance and environmental disruption on an organisation providing services to vulnerable individuals, including children and young people. If the activity were permitted to continue, the disruption and pressure on our staff, premises and safeguarding environment would also continue.

9. Conclusion

9.1 The appeal should be dismissed and the Enforcement Notice upheld.

10. Statement of Truth

I confirm that the evidence I have given is true.

Asif Chaudhery
Head of Legal
Serenity Welfare