

Karim Meraga

Proof of Evidence – regarding Dean Aggett's bundle

In support of Appeal by Dean Aggett

Appeal reference: APP/Y1138/X/26/3378579

Relating to land at 'Meadow Forge', Cadeleigh, Tiverton, EX16 8RZ

- 1 My name is Karim Meraga.
- 2 I am a long-term friend of Dean Aggett, and was an attendee and a witness at the public inquiry at the Hartnoll Hotel on 8th and 9th of September 2026. During those 2 days, I attended the public inquiry from start to finish each day.
- 3 On the date of the 8th September, the inquiry began with housekeeping. It was at this point that the counsel for the local authority asked permission to introduce a new bundle of evidence at the last minute.
- 4 My understanding is that the counsel claimed that no new evidence was included in this new bundle. It was claimed that the new bundle was paginated so would allow documents to be identified more readily.
- 5 Mr Aggett and his counsel were not provided with any reasonable opportunity to read through the new bundle and confirm this. In fact, one of Mr Aggett's team became unnecessarily tied up from this point on, trying to cross check the consistency of items of evidence being referred to while the inquiry was ongoing.
- 6 It quickly became apparent that the different ordering of the evidence in the new bundle was causing some unnecessary confusion and delays. I noticed on several occasions that Mr Aggett's team, and the Inspector struggled to find evidence being referred to, and became dependant on the local authority to get directed to items in the new bundle.
- 7 The local authority appeared to know the bundle off by heart despite it only being presented to Dean's team and the inspectorate on the morning of 8th of September.
- 8 Dean gave his evidence throughout the morning and afternoon of 8th of September. He had brought his own bundle which would have had his evidence in the order with which he was familiar.
- 9 Whilst giving evidence Dean used a mix of both the local authority bundle and his own.
- 10 At no point did I notice any post it notes in Deans own evidence bundle.
- 11 Throughout the cross examination, the counsel for the local authority became insistent that Dean referred only to their late-submitted bundle of evidence, with which he was unfamiliar. Dean clearly was uncomfortable with doing this and wanted to refer to the evidence bundle in the order with which he was familiar.
- 12 Dean stated that he has dyslexia, and that having the information in a different order and numbered differently than what he had prepared and submitted could be confusing and problematic for him. He did comply with the request where possible, sometimes visibly

struggling and attempting to find the referenced evidence in his own bundle as well as in the new bundle.

- 13 I understand Dean has dyslexia. I've noticed symptoms many times over the years. I even noticed on one of the videos which was presented as evidence during the inquiry, Dean had written a caption with the word "Shed" written twice, once spelled correctly and once spelled "Shead".
- 14 I find it highly distasteful and inappropriate that a member of the local authority, namely Stella Radley, would bring into question, or claim to have any knowledge of the struggles Dean lives with due to a disability, as she has done on her witness statement dated 14/09/2026. She has claimed to know how it was easy for Dean to find pages in the unfamiliar late-submitted bundle "When he chose to", but also states how strange she found it that he was often trying to refer to his own evidence bundle. The logic here is highly ableist, and shows either a complete lack of understanding about the disability or a deliberate attempt to mischaracterise a genuine learning difficulty as non-cooperation. It was clear to me that Dean was struggling and would understandably have preferred to use his own evidence bundle that he spent time preparing and submitted in time.
- 15 Dean was examined and cross examined during the morning and the afternoon of 08/09/2026, and had his evidence bundle with him throughout. There were several breaks during this time where members of the local authority who allegedly witnessed post-it-notes in Dean's evidence bundle could have brought it to the attention of their counsel, the inspector, Dean's team, or capture a photograph or some other sort of evidence to back up the claim. They did not.
- 16 On the morning of 09/09/2026, I arrived at the inquiry early and was present in the room while Dean's team were setting up before the inquiry had started. I saw the counsel for the local authority approach Dean's team and request to see Dean's bundle, implying there was some sort of problem but not specifying what. Dean's team looked visibly surprised and confused by the request and the implication. They politely declined at that moment.
- 17 I was sat there watching from that moment until the moment when it was brought up in housekeeping that morning, and the bundles in question were handed to the Inspector. I did not witness the removal of any post it notes from the bundle during that time, or at any other time.
- 18 Based on what I observed over those two days, specifically; the confusion caused by the late bundle, the dismissive attitude toward Dean's dyslexia, the unreasonable expectation that he should dismiss his own evidence bundle and refer only to an unfamiliar one provided at the last minute, and the lack of any timely intervention despite numerous opportunities, it appears to me that the allegations regarding the post-it notes represent a baseless and ambiguous accusation.

And I believe that the contents of the proof of evidence are true to the best of my knowledge and belief.

Signed: _____

Name: _____

Dated: _____

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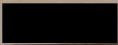
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Signed: 

Name: KARIM MEEAGA

Dated: 20.09.2026