

Dorset Council – Complaint Nos. COM 8299 & COM 8319

Investigation in respect of alleged breaches of the Shaftesbury Town Council Code of Conduct

Investigation undertaken by Mary Dolley Legal Services Dorset Council

Background

Section 27 of the Localism Act 2011 (the 2011 Act) requires relevant authorities to promote and maintain high standards of conduct by members of the authority and, under section 28 of the Act, to have mechanisms in place to investigate allegations that a member has not complied with the Code of Conduct.

Following an initial review by the Complaints Team and having been reviewed by the Monitoring Officer and Dorset Council's Independent Person, complaint numbers COM 8299 and COM 8319 were referred for investigation on 4 February 2025 and 25 April 2025 respectively.

Introduction

In order to be able to carry out an investigation of the complaints raised I viewed and listened to the following:

- The Councillor Code of Conduct ('the Code') adopted by Shaftesbury Town Council ('the Town Council') on 14 May 2024 (Appendix B.1)
- The Standing Orders of the Town Council ('the Standing Orders') adopted by it on 14 May 2024 (Appendix B.2)
- The agenda for the Full Council meeting of the Town Council held on 17 December 2024 (the 17 December meeting) and the minutes of that meeting (Appendix B.3)
- The agenda for the Extraordinary Full Council meeting of the Town Council held on 11 March 2025 (the 11 March meeting) and the minutes of that meeting. (Appendix B.4)
- Audio/video recordings of the 17 December meeting and the 11 March meeting obtained from the Town Council
- The notice given by Cllr Peter Yeo to Dorset Council's Monitoring Officer pursuant to s.30 of the Localism Act 2011 on 4 June 2024. (Appendix B.5)
- Various emails as listed in the table in Appendix B.6

To supplement the information provided to me and available in the public domain on the Town Council's website, I also met virtually with the following people in order to seek their comments on a number of issues:

- Cllr Andy Hollingshead (the complainant) – 19 August 2025 (virtual meeting on Teams) (record of interview at Appendix C)

- Cllr Peter Yeo (the subject member) – 11 September 2025 (virtual meeting on Teams) (record of interview at Appendix D)

Cllr Hollingshead has agreed the record of my interview with him. Cllr Yeo has not agreed the record of my interview with him. He has submitted a written statement which is at Appendix E. I remain of the view that the interview record at Appendix D is an accurate record of the interview. I have read Cllr Yeo's statement and to the extent that its contents are relevant to the investigation this report is concerned with I have applied paragraph numbers to its text and commented on it in the section of this report headed 'Further Findings'.

Complaint No. COM 8299

A complaint was received from Cllr Andy Hollingshead a member of the Town Council alleging that Cllr Yeo has a disclosable pecuniary interest in a project being promoted by The Mampitts Lane Community Land Trust CIO for the development of a community centre as an alternative to and in competition with the development project being promoted by the Town Council and that Cllr Yeo did not obtain a dispensation in accordance with Shaftesbury Town Council's Standing Orders, to speak to and vote on the matter at the meeting on 17 December 2024. The complaint alleges breaches of paragraphs 5 (Disrepute), 6 (Use of position) and 9 (registration and declaration of interests) of the Code

The complaint is set out verbatim at Appendix A.1.

Complaint No. COM 8319

A further complaint was received from Cllr Hollingshead alleging that at an Extraordinary Full Council meeting of the Town Council held on 11 March 2025 Councillor Yeo failed to declare a pecuniary interest in the Mampitts Lane community centre project referred to in the above complaint and did not seek a dispensation to speak to the agenda item relating to it notwithstanding having been acquainted by the Town Clerk with advice received from Dorset Council's Monitoring Officer. The complaint alleges breaches of the same provisions of the Code mentioned above.

The complaint is set out verbatim at Appendix A.2.

Additional possible breach

Following an initial perusal of the Code, the Standing Orders and the agendas and minutes of the meetings mentioned in the complaints and in consultation with the Monitoring Officer and the Independent Person in accordance with section 6.G of the Arrangements for dealing with Code of Conduct complaints against Councillors [Councillor Code of Conduct complaint process February 2025.pdf](#), the scope of the investigation I have carried out has been amended and the subject matter of the part of this report that relates to Paragraph 9 of the Code is an alleged failure to declare and seek a dispensation in relation to a registerable other interest. In light of s.34 of

the Localism Act 2011 the allegation of a failure to declare a pecuniary interest is not being investigated by Dorset Council.

Undisputed facts

The undisputed facts relating to the complaints are:

1. On 4 June 2024 and in accordance with s.30 of the Localism Act 2011 (the 2011 Act) Cllr Yeo gave notice to Dorset Council's Monitoring Officer of:-
 - 1.1. disclosable pecuniary interests that existed (1) by reason of his employment, office, trade, profession or vocation as a Consultant Project Manager and Business Analyst and (2) by reason of his interest in 24 Mampitts Lane Shaftesbury SP7 8GR which is his home; and
 - 1.2. an other registerable interest that existed by reason of his being a trustee of The Mampitts Lane Community Land Trust CIO ('the CIO') and such interests were duly recorded in the register maintained by the Monitoring Officer pursuant to s.29(1) of the 2011 Act. (Appendix B.5)
2. Paragraph 9 and Appendix B of the Code contain provisions for the registration of interests (disclosable pecuniary interests and other registerable interests), the declaration of interests at meetings and the obtaining of dispensations to enable councillors in certain circumstances to participate in the discussion of and to vote on matters in which they have an interest.
3. Paragraph 13 of the Standing Orders sets out detailed provisions relating to the seeking and granting of dispensations.
4. A Full Council meeting of the Town Council was held on 17 December 2024. Notice of the meeting was circulated in advance in accordance with SO3 of the Standing Orders (Appendix B.3) and:-
 - 4.1. item no 2 on the agenda (notice) was 'to receive any Declarations of Interests and Requests for Dispensation'; and
 - 4.2. item no 7 on the agenda was 'to receive an update on the Mampitts Hub Architect Tender process'.
5. The minutes of the 17 December meeting were duly adopted at the meeting of the Town Council held on 21 January 2025 (Appendix B.3). Minute no FC93 (Declarations of Interest) recorded that Cllr Yeo declared an interest in agenda item no 7 as 'Chairman of the Mampitts CIO'. The minutes show that Cllr Yeo had not sought a dispensation in accordance with the section of the Code headed 'Protecting your reputation and the reputation of the local authority' (paragraph 9 and Appendix B), to enable him to take part in the discussion of agenda item no 7 or vote on it and to remain in the room.
6. An Extraordinary Full Council meeting of the Town Council was held on 11 March 2025. Notice of the meeting was circulated in advance in accordance with SO3 of the Standing Orders (see Appendix B.4) and:-
 - 6.1. item no 2 on the agenda (notice) was 'to receive any Declarations of Interests and Requests for Dispensation'; and

6.2.item no 4 on the agenda was 'to consider the appointment of the Mampitts Architect'.

7. The minutes of the 11 March meeting were duly adopted at the meeting of the Town Council held on 18 March 2025. Minute no FC132 (Declarations of Interest) states that 'Cllr Yeo declared that he is an unpaid Trustee of the Mampitts Community Land Trust and a Director of Mampitts CLT, however does not have an interest to declare'. The minutes show that Cllr Yeo had not sought a dispensation in accordance with the section of the Code headed 'Protecting your reputation and the reputation of the local authority' (paragraph 9 and Appendix B), to enable him to take part in the discussion of agenda item no 4 or vote on it and to remain in the room.

Facts/statements not agreed

Cllr Yeo denies that he has acted in breach of the Code.

Findings

1. The underlying situation that gave rise to the complaints is the proposed development of a parcel of land at Mampitts Lane Shaftesbury for community purposes. The land is owned by a third-party developer and is the subject of an agreement under s.106 of the Town and Country Planning Act 1990. Discussions about the proposed development ('the Mampitts Hub project') have been ongoing for some years and:
 - 1.1. The Town Council and the CIO are both promoting proposals for the Mampitts Hub project. Their proposals are different and are referred to in this report as 'the Town Council proposal' and 'the CIO proposal' respectively.
 - 1.2. Cllr Yeo is a trustee of the CIO, which is a charitable incorporated organisation registered with the Charity Commission with registration number 1201203. The CIO came into existence on 1 December 2022, having converted its status from that of a community interest company registered under the Companies Act 2006 on 1 July 2020 as a private company limited by guarantee and then known as The Mampitts Lane Community Land Trust CIC. Cllr Yeo was a director of that company and its registered office was at his home address (24 Mampitts Lane Shaftesbury). The register at the Charity Commission indicates that there are five trustees of the CIO and that Cllr Yeo is the Chair of the trustees, and that its contact address is 24 Mampitts Lane Shaftesbury.
 - 1.3. Planning permission has been obtained for both sets of proposals. Planning permission was granted to the CIO on 8 March 2024 under reference P/FUL/2023/05314, for 'the erection of a community centre with associated parking and landscaping' and planning permission was granted to the Town Council on 2 October 2024 under reference P/FUL/2024/01856, for 'the erection of a community hub/café building with offices over, associated car parking and associated public amenity park'.
 - 1.4. At its Cabinet meeting on 15 October 2024 Dorset Council as planning authority awarded the developer contribution funding (the money committed under the s.106 Agreement) to the Town Council for the Town Council

proposal. The next steps to take forward work on the Town Council proposal included putting out to tender the design work with a view to appointing a firm of architects and setting up an advisory committee in accordance with the Town Council's Scheme of Delegation.

2. The paragraphs of the Code referred to in the complaints are those numbered 5 (Disrepute) and 6 (Use of Position) in the section headed 'General Conduct' and 9 (Interests) in the section headed 'Protecting your reputation and the reputation of the local authority'.
3. Paragraph 5 of the Code requires councillors not to bring their role or local authority into disrepute and explains that councillors are trusted to make decisions on behalf of their community and their actions and behaviour are subject to greater scrutiny than those of ordinary members of the public. The paragraph states that councillors should be aware that their actions might have an adverse impact on themselves, other councillors and/or their local authority and may lower the public's confidence in councillors' and/or their local authority's ability to discharge its functions, and that whilst councillors may hold their local authority and fellow councillors to account and may constructively challenge and express concern about decisions and processes, they must continue to adhere to other aspects of the Code.
4. Paragraph 6 of the Code requires councillors not to use or attempt to use their position improperly to the advantage or disadvantage of themselves or anyone else. It explains that councillors' position as members of a local authority provide them with certain opportunities etc., such opportunities must not be taken advantage of to further councillors' own private interests or those of others.
5. Paragraph 9 of the Code is headed 'Interests' and requires councillors both to register and to declare their interests. It explains that interests must be registered so that the public, local authority employees and fellow councillors know which of a councillor's interests might give rise to a conflict of interest. It states also that a councillor is personally responsible for deciding whether to declare an interest at a meeting but that it can be helpful for that councillor to know early on if others think that a potential conflict might arise. The paragraph states that Appendix B of the Code sets out the detailed provisions on registering and declaring interests and suggests that if a councillor is in doubt they should seek advice from the Monitoring Officer.
6. The Code was adopted by the Town Council on 14 May 2024. Amongst other things, under S.28(2) of the 2011 Act the Town Council is required to ensure that the Code includes appropriate provision for the registration in its register and disclosure of:
 - 6.1. pecuniary interests, and
 - 6.2. interests other than pecuniary interests.
7. In accordance with s.29(1) and s.29(4) of the 2011 Act the register referred to in paragraph 6 above has been established and is maintained by Dorset Council's Monitoring Officer. S.29 (2) of the Act allows the local authority to determine what is to be entered in the register of interests, subject to the specific requirement under

s.30 of the Act and the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 (SI 2012/1464) relating to the registration of disclosable pecuniary interests.

8. Appendix B of the Code and the Tables in it set out in detail the provisions relating to registering and declaring interests. In accordance with s.28(2) of the Act registerable interests are stated to fall into two categories – disclosable pecuniary interests and other registerable interests. Paragraphs 1 to 4 of Appendix B of the Code set out the requirements for registration of interests.
9. Under s.30 of the 2011 Act Cllr Yeo was required on taking office to notify the Monitoring Officer of any disclosable pecuniary interests and duly did so on 4 June 2024 (see para.1 in the section above headed 'Undisputed facts' and Appendix B.5). The disclosable pecuniary interests so notified and with which this investigation is not concerned, were ones that exist (1) by reason of his employment, office, trade, profession or vocation as a Consultant Project Manager and Business Analyst and (2) by reason of his interest in 24 Mampitts Lane Shaftesbury SP7 8GR which is his home. On that date and in accordance with the Code he also notified the Monitoring Officer of an other registerable interest namely that which existed by reason of his being a trustee of the CIO.
10. Paragraphs 5 to 9 of Appendix B of the Code speak to the declaration of interests where a matter arises at a meeting which directly relates to a relevant interest. Paragraph 6 states that in the case of a matter which directly relates to an other registerable interest the councillor must declare the interest, speak on the matter only if members of the public are also allowed to speak at the meeting, but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless a dispensation has been granted.
11. Paragraph 3(u) of the Standing Orders states that a councillor who has a disclosable pecuniary interest or an other interest as described in the Code in a matter being considered at a meeting is subject to statutory limitations or restrictions under the Code, on their right to participate and vote on that matter.
12. Paragraph 13 of the Standing Orders sets out in detail the limitations and restrictions including the obligation to withdraw from a meeting in the circumstances described in paragraph 10 above. Paragraph 13(c) states that unless they have been granted a dispensation a councillor shall withdraw from a meeting when it is considering a matter in which they have an other interest, if so required by the Code. Sub-paragraphs (d) to (h) of Paragraph 13 describe the process that enables a councillor to make a request for a dispensation to enable them to participate in discussion and/or vote. Requests must be in writing and submitted to the Proper Officer (the Town Clerk) as soon as possible before the meeting in question, or at the start of the meeting. A request must identify and describe the nature of the disclosable interest for which the dispensation is sought and explain why it is being sought. The decision as to whether a dispensation is to be granted is made by the Proper Officer and SO13(h) states that a dispensation may be granted if having regard to all relevant circumstances any of the three criteria described in that sub-paragraph apply. The criteria include consideration of whether without the dispensation the number of councillors prohibited from participating would be so large as to impede transaction of the business in

question, consideration of whether granting the dispensation is in the interests of persons living in the area, or whether it is otherwise appropriate to grant a dispensation. The system for declaring interests and seeking dispensations is born of the Nolan Principles of Public Life that speak to integrity and openness. The principle of integrity requires holders of public office to declare and resolve any interests and relationships, and the principle of openness requires them to act and take decisions in an open and transparent manner.

13. Cllr Hollingshead's complaints relate to the conduct of Cllr Yeo at the two Town Council meetings referred to above namely the 17 December meeting and the 11 March meeting and in order to investigate the complaints and as well as meeting with Cllrs Hollingshead and Yeo as described above and reading the agendas and minutes of the meetings (Appendices B.3 and B.4), I listened to the recordings of the meetings. I also obtained from the Clerk to the Town Council and the Monitoring Officer the items of email correspondence particularised in Appendix B.6.

14. As to the 17 December meeting:-

- 14.1. Agenda Item no. 2 consisted of a reminder to councillors and officers, of their obligations to declare interests in accordance with the Code. It stated also that the Clerk would report any dispensation requests received, and reminded councillors that where a matter arises at a meeting that relates to a councillor's interest it is their responsibility to declare that interest in accordance with the Code.
- 14.2. The minutes of the 17 December meeting show that whilst Cllr Yeo as chairman of the CIO declared an interest in agenda item no.7 which related to the Mampitts Hub project, he had not prior to the meeting sought a dispensation to permit him to take part in any discussion of it, vote on it or remain in the room, nor did he do so during the course of the meeting.
- 14.3. During the discussion of the previous item (agenda item no 6 – to approve payments and receive financial reports) Cllr Yeo had objected vociferously to payment being made to the firm of architects instructed by the Town Council to deal with certain preliminary aspects of the Mampitts Hub project.
- 14.4. There was extensive and detailed discussion about agenda item no 7, including the suggestion that an advisory committee be set up to oversee aspects of the Mampitts Hub project. Cllr Yeo requested permission to speak. He stated that the planning application made by the Town Council was wrongfully made because it hadn't been approved by the Full Council. Cllr Chase, who was in the chair, corrected him and stated that it had been properly approved and that the Town Clerk had been authorised to sign the application form. Cllr Yeo voiced his opposition to the establishment of an advisory committee notwithstanding that both Cllr Chase and the Town Clerk stated that the committee would have an advisory role only and would not take decisions. Cllr Yeo referred to the existence of the CIO proposal for the Mampitts Hub project. He made accusations of a personal nature about councillors who had sat on the previous Mampitts advisory committee and said that they had set out to frustrate the CIO proposal. Cllr Yeo continued to interrupt Cllr Chase who was endeavouring to progress the discussion of agenda item no 7 and stated that he did not have the integrity to be Mayor. Cllr Chase warned Cllr

Yeo that if he did not moderate his behaviour, he would move to have him excluded from the meeting. The discussion continued in a fractious and ill-humoured way as Cllr Yeo continued to interrupt, making accusations of a lack of integrity on the part of some of his fellow councillors and saying that they had turned the Town Council into a joke. He described the procedure by which the advisory committee was to be constituted as shocking and a disgrace.

- 14.5. The discussion of agenda item no. 7 lasted for approximately 35 minutes, and I find that by reason of Cllr Yeo's conduct parts of it were conducted in a manner that did not maintain public confidence in the role of councillor and local government. I noted also that throughout the discussion although Cllr Yeo repeatedly interrupted the Chair and other councillors who were speaking with the Chair's permission, he complained vociferously when he considered that others were interrupting him.

15. As to the 11 March meeting:-

- 15.1. The meeting was convened with one main agenda item namely to consider the appointment of an architect for the Mampitts Hub project.
- 15.2. A number of members of the public were in attendance and the period for public speaking at the beginning of the meeting was extended by the direction of Cllr Edwyn-Jones who was chairing the meeting, beyond the period allowed by SO3(f) and lasted for approximately 37 minutes. At points during the public participation the discussion became fractious and when Cllr Edwyn-Jones brought the period to a close Cllr Yeo attempted to prevent her from moving to the formal part of the meeting.
- 15.3. Agenda Item no. 2 for the meeting consisted of a reminder to councillors and officers, of their obligations to declare interests in accordance with the Code. It stated also that the Clerk would report any dispensation requests received, and reminded councillors that where a matter arises at a meeting that relates to a councillor's interest it is their responsibility to declare that interest in accordance with the Code.
- 15.4. The minutes of the 11 March meeting state that 'Cllr Yeo declared that he is an unpaid Trustee of the Mampitts Community Land Trust and a Director of Mampitts CLT, however does not have an interest to declare'. The minutes also state that the Town Clerk read out the extract from an email sent by Dorset Council's Monitoring Officer referred to in paragraph 15.6 below. The minutes show that Cllr Yeo had not sought a dispensation to permit him to take part in any discussion of it, vote on it or remain in the room.
- 15.5. When Cllr Edwyn-Jones enquired whether any of the councillors wished to declare an interest or seek a dispensation Cllr Yeo said that he was a resident of Mampitts Lane and a director of the CIO but he did not seek a dispensation in accordance with the Standing Orders and stated that he did not need to do so.
- 15.6. With Cllr Edwyn-Jones' permission the Clerk read out information and advice that had been given previously to Cllr Yeo by Dorset Council's Monitoring Officer about the circumstances in which it is necessary for interests to be declared and dispensations obtained. Cllr Yeo interrupted the Town Clerk and stated that the advice was not relevant and talked over Cllr Edwyn-Jones when she tried to move on to the next agenda item.
- 15.7. Agenda item no. 3 sought approval of the minutes of the Mampitts Advisory Committee that had been held on 3 March 2025. Cllr Yeo said that

minutes were not correct; one of the corrections he sought related to the inclusion as an attendee of a child under the age of 18. The corrections he requested were duly made.

- 15.8. Cllr Yeo remained standing as Cllr Edwyn-Jones introduced agenda item no. 4 headed 'To consider the appointment of the Mampitts Architect' and tried to take forward discussion of it. Cllr Williams gave a report on the work done by the advisory committee and other councillors spoke to the matter. Cllr Yeo remained standing throughout and when it was his turn to speak he said that other councillors were seeking to frustrate a scheme that the residents wanted and that it was a disgrace. He continued to urge the adoption of the CIO proposal.
- 15.9. During the 11 March meeting Cllr Yeo repeatedly interrupted Cllr Edwyn-Jones and other councillors while they were speaking, and he refused to sit down when asked to do so. The tone in which he spoke was confrontational and aggressive and his manner was disrespectful and belligerent. I find that by reason of Cllr Yeo's conduct the meeting became fractious and degenerated to the point where it could not be said that its business was being conducted in a manner such as to maintain public confidence in the role of councillor and local government.
16. I have read the Standing Orders and I find that they do not bear an interpretation that gives a person (whether a councillor or a member of the public), an absolute right to speak for three minutes. SO1(o) states that unless permitted by the chairman of the meeting a councillor may (subject to limited exceptions), speak once in the debate on a motion and SO1(p) provides that during the debate on a motion a councillor may interrupt only on a point of order or a personal explanation. SO1(t) states that contributions or speeches by a councillor shall relate only to the motion under discussion and shall not exceed three minutes without the consent of the chairman of the meeting. Nor do the Standing Orders confer on a councillor the right to speak for three minutes if they are doing so in a manner that obstructs the transaction of business or is offensive or improper and thus contravenes SO2.
17. One of the matters complained of by Cllr Yeo during the 11 March meeting was that minutes of previous Town Council meetings did not contain a verbatim record of everything that was said by those who spoke to the agenda items that were being debated. Having read SO3(t) of the Standing Orders, which sets out in detail the matters that must be accurately recorded, I find that there is no provision for the minutes to contain a transcript or summary of discussion and debate at meetings.
18. I have made enquiries to ascertain whether Cllr Yeo has undertaken the training he is required to undertake pursuant to paragraph 8.1 of the Code and I have been advised that the Town Council's records show that he has not.
19. I have considered the Guidance issued by the Charity Commission to persons who are considering setting up a charity [The essential trustee: what you need to know, what you need to do - GOV.UK](https://www.gov.uk/guidance/the-essential-trustee-what-you-need-to-know-what-you-need-to-do) Section 6 of the Guidance states that a charity trustee must avoid putting themselves in a position where their duty to the charity conflicts with their personal interests or loyalty to any other person or body. The Guidance goes on to state that acting in the charity's best interests means always

doing what the trustees decide will best enable the charity to carry out its purposes. The Charity Overview page for the CIO on the Charity Commission website states that 'The charity is acting to become the nominated body to deliver, own, manage and operate a Community Hall and Nature Park on the s106 land at Mampitts Lane Shaftesbury, activities will be anything that complies with our charitable objects that benefit the residents of Shaftesbury and the nearby areas with regards to social, educational, health and wellbeing.' I therefore find that at all material times there was a potential conflict between Cllr Yeo's duties as a trustee of the CIO and as a councillor.

20. Cllr Yeo has previously received detailed and comprehensive advice from the Town Clerk and Dorset Council's Monitoring Officer about the declaration of interests:

20.1. At 10.04 on 19 June 2024 the Town Clerk emailed Cllr Yeo (Appendix B.6.1) reminding him of an email she had sent the previous December and reminding him of the need to observe the provisions relating to the declaration of interests and advising him also of the desirability of undertaking training about the Code (Standards in Public Life). Cllr Yeo replied little more than an hour later on the same day (Appendix B.6.1) and his email criticised the conduct of the Town Clerk and made veiled allegations of improper conduct on the part of some of his fellow councillors but did not address what the Town Clerk had said about the need for him to declare interests. The Town Clerk sent a further email to Cllr Yeo at 12.50 on 19 June, rejecting the allegations he had made about her conduct, referring him to his obligations under the Code and suggesting that he might wish to meet with her to discuss how productive ways of working might be established. There having subsequently been some doubt as to whether Cllr Yeo had received that email, the Town Clerk re-sent it on 3 July 2024.

20.2. The Monitoring Officer also emailed Cllr Yeo on 19 June 2024 (Appendix B.6.2) and reminded him of paragraphs 5 and 6 in Appendix B of the Code, which relate to the disclosure of pecuniary and other interests at meetings and the need for a dispensation to be obtained if the councillor who has a relevant interest wishes to take part in a discussion or vote or to remain in the room while matter in question is being debated. The email also advised Cllr Yeo that a change of circumstances might mean that the nature of his interest would change and become a disclosable pecuniary interest rather than an other interest, and the consequences of this. On 10 July the Town Clerk emailed Cllr Yeo again (Appendix B.6.2) and (1) acquainted him with advice she had received from the National Association of Local Councils in relation to pecuniary and other registerable interests and the provisions of s.31 of the Localism Act 2011 and (2) reminded him of the provisions relating to the seeking of dispensations.

20.3. On 18 December 2024 the Town Clerk emailed all councillors on the Town Council including Cllr Yeo (Appendix B.6.3) in response to an email she had received from one of the other councillors who had enquired about the provisions of the Code relating to the disclosure of interests. The Town Clerk's email attached the LGA Guidance referred to throughout this report and urged all councillors to familiarise themselves with the provisions relating to the declaration of interests and reminded them of their individual personal responsibilities. The Town Clerk explained that the rules governing the

declaration of interests exist to give the public confidence in the Town Council's decision making.

- 20.4. On 19 December 2024 Cllr Yeo emailed the Town Clerk at 10.41 (Appendix B.6.4) in response to the email that had been sent to all councillors in connection with the formation of the Mampitts Advisory Committee in accordance with the decision taken at the 17 December meeting. Cllr Yeo's email, which he copied to all Town Council councillors, contained allegations of impropriety on the part of the Town Clerk and some of his fellow councillors and was belligerent and offensive in tone. The Town Clerk responded by email sent at 13.55 the same day (Appendix B.6.4) to all councillors in which she set out again the provisions relating to the declaration of interests.
- 20.5. On 31 December 2024 the Monitoring Officer emailed Cllr Yeo (Appendix B.6.5), having been given the email referred to in paragraph 20.4 and having reminded himself of the registerable interest Cllr Yeo had disclosed to him relating to his position as a trustee of the CIO. The email reminded Cllr Yeo that mere disclosure of his interest was not sufficient, that his first duty was to the CIO, and reiterated the provisions contained in paragraph 6 of Appendix B of the Code. The Monitoring Officer stated that he supported as reasonable the Town Clerk's advice to Cllr Yeo in relation to the conflict of interest.

Further Findings

21. To the extent that they are relevant to the complaints I have investigated I comment below on the first part of Cllr Yeo's statement (Appendix E); the paragraphs numbered 31 to 46 are dealt with in the report relating to the complaint numbered COM 8830.
22. I do not accept Cllr Yeo's contention set out in paragraphs 1 to 7 and 10 of his statement, that because the agenda items numbered 7 and 4 on the agendas for the 17 December meeting and the 11 March meeting respectively related to an aspect of the process for progressing the Town Council proposal for the Mampitts Hub project and did not mention the CIO proposal, he was absolved from the obligation to comply with the provisions of the Code relating to disrepute (Paragraph 5 of the Code) and the declaration of interests and related requirement to seek a dispensation if he wished to remain in the room, speak and vote (Paragraph 9 of the Code).
23. As explained in paragraph 1 above, the Town Council proposal and the CIO proposal are in opposition to one another; there is only one site for the Mampitts Hub project and one developer contribution funding payment – if one proposal goes ahead the other will not. Having listened to the recordings of the meetings and read Cllr Yeo's statement it is clear to me that he expects that if the Town Council proposal was to fall by the wayside the CIO proposal would be brought forward and awarded the developer contribution funding payment, and that this outcome was being actively pursued by him. On more than one of the occasions during the 17 December meeting and the 11 March meeting when Cllr Yeo was seeking to discredit the Town Council proposal, he referred to the CIO proposal and his desire to see it progressed. Even when he did not refer specifically to it but mentioned

the existence of another proposal it was clear that he was referring to the CIO proposal; no other person or body has obtained planning permission for development of the land. Moreover it is clear from the language used by Cllr Yeo in his statement, that he is opposed to the Town Council proposal. The extent of his dislike of the Town Council proposal is clear from the use of the word 'unpopular' in paragraph 8 and his reference in paragraph 11 to local residents being 'strongly against' it, it being 'poorly designed' and the car parking arrangement being 'dangerous'. I therefore find that the matters relating to the Mampitts Hub project that arose at the 17 December meeting and the 11 March meeting did directly relate to the interest that Cllr Yeo had registered as an other interest within the meaning of paragraph 6 of Appendix B of the Code, that he was not correct in his assertion that he did not have to declare it, and that if he had wished to remain in the room and participate in the discussion and vote he ought to have obtained a dispensation in accordance with the Code.

24. Having listened to the recordings of the 17 December and 11 March meetings and interviewed the complainant Cllr Hollingshead I have found no evidence to support Cllr Yeo's assertions that the Town Clerk sought to mislead and negatively influence councillors (paragraphs 8, 28 and 29 of his statement). Nor have I found any evidence to support his assertion that the complainant's action in seeking to raise a point of order in relation to SO13 was malicious, or that the complainant's intention was to mislead and misinform his fellow councillors, or that the complainant's actions amount to harassment of Cllr Yeo, or that the Town Council proposal has been unlawfully progressed (paragraphs 9, 11, 15 to 17, 25 and 30 of his statement).

25. As regards paragraphs 12 to 14 of the statement, the complaints were assessed by the Monitoring Officer in accordance with paragraph 6.B of Dorset Council's Arrangements for dealing with Code of Conduct complaints against Councillors [Councillor Code of Conduct complaint process February 2025.pdf](#) and the views of the Independent Person were sought in accordance with s.28(7) of the Localism Act 2011, before they were referred to me for investigation.

Conclusion

On concluding my investigation, I am of the view that Cllr Yeo is in breach of the Code as follows:

1. As regards the allegation that Cllr Yeo's conduct breached paragraph 5 of the Code:

Conclusion: In my opinion Councillor Yeo's conduct breached this provision of the Code.

The preamble to the General Principles of councillor conduct (page 4 of the Code) states that everyone in public office should uphold the Seven Principles of Public Life (the Nolan Principles) and sets out how councillors should act on all occasions. One of the Principles is a requirement to lead by example and act in a way that secures public confidence in the role of councillor. Paragraph 5 of the Code requires councillors not to bring their role or local authority into disrepute. The accompanying

text explains that councillors are trusted to make decisions on behalf of their communities and that their actions and behaviours are subject to greater scrutiny than that of ordinary members of the public, and that they should be aware that their actions might have an adverse impact on them, other councillors and/or their local authority and may lower the public's confidence in their or their local authority's ability to discharge their or its functions.

The LGA Guidance about its Model Councillor Code of Conduct (the Code is in the LGA form and the Guidance is here [Guidance on Local Government Association Model Councillor Code of Conduct | Local Government Association](#)) reminds councillors that although Article 10 of the European Convention on Human Rights protects their right to freedom of expression and political speech made as a councillor is given enhanced protection, this right is not unrestricted. The LGA Guidance defines disrepute as a lack of good reputation or respectability, and explains that in the context of the Code a councillor's behaviour in office will bring their role into disrepute if the conduct could reasonably be regarded as either reducing the public's confidence in them being able to fulfil their role or adversely affecting the reputation of their authority's councillors in being able to fulfil their role. The LGA Guidance goes on to state that conduct by a councillor which could reasonably be regarded as reducing public confidence in their local authority being able to fulfil its functions and duties will bring the authority into disrepute. An example offered by the LGA Guidance of conduct that could bring the role of councillor into disrepute, is the use of abusive and threatening behaviour, and an example of behaviour that might be regarded as bring the local authority into disrepute, is the making of grossly unfair or patently untrue or unreasonable criticism of the local authority in a public arena.

From watching and listening to the video/audio recordings of the 17 December and 11 March meetings it is clear to me that whilst the proposals for the Mampitts Hub project have been a matter of discussion for some few years and arguably for longer than necessary or desirable in the circumstances, the decision to proceed with the Town Council proposal was lawful and the steps needed to progress it that were to be discussed as the relevant agenda items were necessary ones. By persisting with his attempts to thwart progress of the Town Council proposal and doing so in a manner that involved behaviour of the nature described in paragraphs 14 and 15 of the section of this report headed 'Findings' I conclude that Cllr Yeo's conduct went beyond holding the Town Council and his fellow councillors to account, that the way in which he expressed his concern about decisions and processes undertaken by the Town Council did not adhere to the provisions of the Code that required him to treat his fellow councillors and employees of the Town Council (specifically the Town Clerk) with respect and that his conduct thus breached Paragraph 5 of the Code.

2. As regards the allegation that Cllr Yeo's conduct breached paragraph 6 of the Code:

Conclusion: In my opinion Cllr Yeo's conduct did not breach this provision of the Code.

Paragraph 6 of the Code provides that a councillor must not use their position improperly to the advantage or disadvantage of themselves or anyone else. The supplemental text reminds councillors that their position as a member of the local authority provides them with opportunities, responsibilities and privileges, that they will

be making choices that impact others, and that they should not take advantage of opportunities to further their own or others' private interests or to disadvantage anyone unfairly.

The supplemental text is based on the LGA Guidance, which goes on to state that guidance for councillors on how to conduct themselves when they have an interest and how to balance their rights as an individual and their responsibilities as a public decision maker is offered in the chapter on the registration of interests.

Although Cllr Yeo has vociferously and repeatedly urged his opinion that the Town Council proposal is not appropriate and that the CIO proposal would better serve the needs of the residents of Shaftesbury, and has seemingly failed to consider how his obligations as a trustee of the CIO may conflict with his responsibilities as a councillor, I have found no evidence that he did so in order to further his own private interests and I have therefore concluded that Cllr Yeo's conduct did not breach Paragraph 6 of the Code.

3. As regards the allegation that Cllr Yeo's conduct breached paragraph 9 of the Code:

Conclusion: In my opinion Cllr Yeo's conduct breached this provision of the Code.

The preamble referred to in paragraph 1 above refers to the Nolan Principle that requires councillors to avoid conflicts of interest. Paragraph 9 of the Code is headed 'Protecting your reputation and the reputation of the local authority' and requires councillors to register and declare their interests. The explanatory text states that it is necessary for councillors to register their interests so that the public, local authority employees and fellow councillors know which of a councillor's interests might give rise to a conflict of interest. The text goes on to explain that councillors are personally responsible for deciding whether or not to declare an interest at a meeting but that it can be helpful for them to know early on if others think that a potential conflict might arise, and points out that it is also important that the public know about any interest that might have to be declared during the decision taking process so that decision making is seen by the public as open and honest. Appendix B of the Code sets out the detailed provisions for registering and declaring interests and reminds councillors that if in doubt they should always seek advice from the Monitoring Officer.

The LGA Guidance referred to above explains that a councillor who has an other registerable interest should not participate in relevant business in two circumstances, namely when a matter directly relates to the finances or wellbeing of that interest or when a matter affects the finances or wellbeing of that interest to a greater extent than it affects the majority of inhabitants, and a reasonable member of the public would thereby believe that the councillor's view of the public interest would be affected. The Code and the LGA Guidance refer to the procedure for obtaining a dispensation to enable councillors to participate in the discussion of a matter in respect of which they have an interest that they have disclosed. SO13 sets out the steps required for a dispensation to be obtained. Amongst other things a councillor who makes a request for a dispensation must explain why the dispensation is being sought. It is in the interests both of the councillor requesting the dispensation and the other councillors that the existence of the conflict of interest is openly acknowledged and understood.

Paragraph 9 of the section of this report headed 'Findings' confirms that Cllr Yeo duly registered his interest as a trustee of the CIO, in accordance with paragraph 1 in Appendix B of the Code and declared that interest at or in advance of the 17 December meeting and the 11 March meeting. Paragraph 10 of that section refers to the provisions that apply where a councillor wishes to speak on a matter which directly relates to an other registerable interest that they have declared. For the reasons given in paragraph 23 of the 'Findings' section of this report I do not consider that the fact that agenda items 7 at the December meeting and 4 at the 11 March meeting related to aspects of the Town Council proposal, rendered it unnecessary for Cllr Yeo to consider how his duty as a trustee of the CIO might conflict with his role as a councillor and to be aware of the potential for a perception that he had a conflict of interest. Every decision taken by the Town Council to progress the Town Council proposal will inevitably relate to Cllr Yeo's other registerable interest (his being a trustee of the CIO) within the meaning of paragraph 6 of Appendix B of the Code, because constructing the community facility in accordance with the Town Council proposal will mean that the CIO proposal will not be brought to fruition.

Cllr Yeo was at liberty to vote against the Town Council proposal if he believed that the CIO proposal would better meet the needs of the residents of Shaftesbury, and to vote against motions relating to its progress. It is however essential that his fellow councillors are given the information about his role as a trustee of the CIO and his legal obligations as such, so that they are fully aware of his conflict of interest and its implications. This should be achieved by Cllr Yeo both disclosing the interest and seeking a dispensation in accordance with the Code and the Standing Orders to enable him to remain in the room, participate in the discussion about the Mampitts Hub project and vote.

I therefore conclude that as Cllr Yeo had not obtained a dispensation in accordance with SO13, by remaining in the room during the relevant periods at the 17 December and 11 March meetings, participating in the discussion of agenda items 7 and 4 respectively and voting on them, he was in breach of Paragraph 9 of the Code.

In reaching my conclusion I have also noted that the matter of Cllr Yeo's position as a trustee of the CIO and its predecessor organisation and the potential conflict with his role as a member of the Town Council has been aired on a number of occasions. The email correspondence referred to in paragraph 20 of the section of this report headed 'Findings' speaks to the extent to which the matter of a potential breach of the Code and conflict with the Nolan Principles, has been identified to Cllr Yeo and advice offered to him over a not inconsiderable period by both the Town Clerk and Dorset Council's Monitoring Officer.

I have also noted that when reminded of his need to comply with the Code and the Standing Orders (the Town Clerk's email of 19 June 2024 – Appendix B.6.1), the second, third, fourth and fifth paragraphs of Cllr Yeo's response of the same date indicated a clear desire on his part to advance the CIO proposal in preference to the Town Council proposal. Likewise, I conclude that the comments made in Cllr Yeo's email of 19 December 2024 (Appendix B.6.4) go beyond expressing his dislike of the Town Council proposal and demonstrate his desire to promote the CIO proposal. Having considered the contents of the emails listed in Appendix B.6 and his statement (Appendix E) as well as what he said and the manner in which he spoke at the 17 December meeting and the 11 March meeting, I have concluded that Cllr Yeo has not

demonstrated an understanding and acceptance of the need to be seen to be acting in an open and transparent manner and in a way that ensures that public confidence in the integrity of local governance is maintained, as required by paragraph 9 of the Code.

Further conclusions

1. It is a matter for regret that dissent about the way forward for the Mampitts Hub project has seemingly hindered its progress, and it would be all the more unfortunate if continuing disagreement and attempts to thwart the Town Council proposal were further to delay the provision of the facilities needed by the residents of Shaftesbury.
2. Watching and listening to aspects of the conduct of the 17 December and 11 March meetings as part of my investigation was a sometimes unedifying experience. It was clear to me that it was at times an unnecessarily difficult and unpleasant task for the chair of the meetings to manage their orderly and dignified progress in a manner that ensured public confidence in the Town Council, and indeed on occasions even to retain control of them. I have observed that many of the councillors and the previous Town Clerk have shown considerable fortitude and resilience in accommodating the conduct of the minority, balancing the need for all councillors to be allowed to 'have their say' even when doing so more frequently than most other councillors and in an aggressive and intemperate manner and in a way that breaches provisions of the Code and the Standing Orders, with the need to progress Town Council business in a timely and lawful way for the benefit of the residents of Shaftesbury. The patience of some councillors, who have listened to personally offensive remarks being made about them and in some instances their integrity being impugned but without responding in kind, is in my view commendable. It must also be a matter of some concern that the unpleasant atmosphere at the Town Council meetings may have an adverse effect on the staff who carry not inconsiderable responsibility for the effective day-to-day running of the Town Council, to the extent that its ability to attract and retain suitable staff and in particular a Town Clerk with the necessary skills and commitment, may be in jeopardy.
3. When listening to the recording of the 17 December meeting it was also a source of some concern to me that at the beginning of the meeting the chairman had to report that material had been posted on social media that contained libellous accusations and falsehoods relating to the conduct of officers of the Town Council, and had to remind those present of the Nolan principles and the need to observe the civility and respect principles in particular. Although not within the scope of my investigation I am aware of other instances where meetings of the Town Council have descended to a level that did not secure public confidence in the role of councillor and local government in accordance with the stated fundamental aim of the Code.

Mary Dolley
Legal Services

Appendix A

A.1 - COMPLAINT No. CCF671466018

Cllr Yeo is the Chair of the Mampitts Lane Community Land Trust CIO. In one form or another this organisation has been seeking to secure s106 money (£880k) to develop a community centre in competition with Shaftesbury Town Council. Funding has now been awarded to STC. However Cllr Yeo continues to advocate in public and in writing for his scheme and, although he declares his membership of the CIO, continues to speak and vote against STC on matters relating to the Community Centre. This was last evidenced at Full Council 17/12/24 and, when challenged, claimed not to have a disclosable pecuniary interest. This is clearly incorrect. Furthermore, he has not applied to the Clerk for dispensation.

A.2 - COMPLAINT No. CCF697750919

At an EFC on the 11th March 2025 which was called to resolve on the choice of an architect for the next stage of the Mampitts Hub project Cllr Yeo failed to declare a pecuniary interest or to seek a dispensation despite the Clerk reading out the legal requirements and Cllr Hollingshead raising a Point of Order breach of SO 13 (Code of Conduct and Dispensations). Cllr Yeo continued to speak in support of the Mampitts Lane CIO of which he is Chair. In the end the resolution was changed by Members to include discussions with the architect who had designed the Mampitts Lane CIO's building plan even though that architect had not met the tendering selection criteria. This is a clear disclosable pecuniary interest and, taken together with previous failures to declare a pecuniary interest and the outcome of the meeting and the resolutions voted through, is sufficiently serious that there may be prima facie evidence of a criminal offence under S34 of the Localism Act, 2011

Appendix B

1. The Town Council's Code of Conduct [Model Councillor Code of Conduct 2020](#)
2. The Town Council's Standing Orders [Standing-Orders-2025-05-20.pdf](#)
3. The Agenda and Minutes of the Full Council meeting of the Town Council held on 17 December 2024 [2024-12-17-Full-Council-Agenda-1.pdf](#) and [2024-12-17-Full-Council-Minutes-Approved.pdf](#)
4. The Agenda and Minutes of the Extraordinary Meeting of the Town Council held on 11 March 2025 [2025-03-11-EFC-Agenda.pdf](#) and [2025-03-11-EFC-Minutes-Approved.pdf](#)
5. The notice given by Cllr Yeo pursuant to s.30 of the Localism Act 2011 as it appears in the register of interests maintained by Dorset Council's Monitoring Officer

pursuant to s.29 of the 2011 Act in relation to his interests [Councillor Peter Yeo, Shaftesbury Town Council - Dorset Council](#)

6. Email correspondence between Cllr Yeo, the Town Clerk and others as per the table below:

B.6.1	Chain of emails dated 8 December 2023, 19 June 2024 and 3 July 2024 – the Town Clerk and Cllr Yeo
B.6.2	Further chain of emails incorporating B.6.1 above and including email dated 19 June 2024 from Dorset Council's Monitoring Officer (J Mair) to Cllr Yeo and email dated 10 July 2024 from the Town Clerk to Cllr Yeo
B.6.3	Chain of emails culminating in that dated 18 December 2024 from the Town Clerk to all members of the Town Council
B.6.4	Chain of emails including that dated 19 December 2024 from Cllr Yeo to the Town Clerk and the Town Clerk's reply (sent to all councillors) of the same date
B.6.5	Email dated 31 December 2024 from Dorset Council's Monitoring Officer (J Mair) to Cllr Yeo

Appendix C

Interview with Cllr Andy Hollingshead (Complainant)

1. I explained to Cllr Hollingshead that the purpose of the interview was to gather information to enable me fully to understand the background to the complaints I had been asked to investigate, so that I could formulate my report and any conclusions for consideration by the Monitoring Officer and the Independent Person and if necessary, by the Audit and Governance (Hearing) Sub-Committee. I explained that the investigation is being undertaken in accordance with Dorset Council's Arrangements for dealing with Councillor Code of Conduct complaints and I advised him that the Arrangements could be accessed on Dorset Council's website. I advised Cllr Hollingshead that our interview was to remain confidential.
2. I reminded Cllr Hollingshead that as explained in my email of 30 July my investigation is now proceeding on the basis that there may have been failures to disclose and seek dispensations in relation to other registerable interests rather than disclosable pecuniary interests.
3. At the Full Council meeting on 17 December 2024 and during the discussion of Agenda item no 7 (to receive an update on the Mampitts Hub Architect Tender process) Cllr Hollingshead asked Cllr Yeo whether he was still the Chairman of the Mampitts Lane Community Land Trust CIO and he confirmed that he is. The ensuing discussion about the nature of Cllr Yeo's interest in agenda item no 7 became fractious.
4. At the Extraordinary Full Council meeting on 11 March 2025 and during the discussion of Agenda item no 2 (To receive and Declarations of Interests and Requests for Dispensation) the Town Clerk read out an extract from an email sent by the Monitoring Officer to Cllr Yeo on 31 December 2024. The Monitoring Officer's email reminded Cllr Yeo that as a trustee of Mampitts Lane Community Land Trust CIO his first duty was towards that body and that if a matter relating to

it arises at a Council meeting he must consider whether it relates directly to the financial interest or wellbeing of the CIO, and if it does he must disclose the interest at the meeting, speak only to the same extent as a member of the public is allowed to speak but must not otherwise take part in any discussion or vote and must not remain in the room without a dispensation. Cllr Yeo stated that the fact that he is a trustee of the Mampitts Community Land Trust CIO was not relevant and that he did not have a disclosable other interest such as to prevent him from participating in the discussion.

5. Cllr Hollingshead felt that the members of the public who were in attendance and asked questions during the public participation session at the beginning of the meeting had been encouraged to do so by Cllr Yeo. Cllr Yeo repeatedly interrupted the Chairman when she was trying to answer questions from members of the public. The discussion about what was a straightforward matter, namely the appointment of an architect to take forward work on the Mampitts community hub project for which the Town Council had obtained s.106 funding from Dorset Council, became fractious and indeed disorderly to the point where Cllr Hollingshead felt that by reason of Cllr Yeo's behaviour it was difficult for the Chairman to retain effective control of the meeting.

Appendix D

Interview with Cllr Peter Yeo (Subject member)

1. I introduced myself to Cllr Yeo and explained to him that the purpose of the interview was to gather information to enable me fully to understand the background to the complaints I had been asked to investigate, so that I could formulate my reports and any conclusions for consideration by the Monitoring Officer and the Independent Person and if necessary, by the Audit and Governance (Hearing) Sub-Committee. I reminded him that the investigation is being undertaken in accordance with Dorset Council's Arrangements for dealing with Councillor Code of Conduct complaints details of which had been notified to him previously. I advised Cllr Yeo that our interview was to remain confidential.
2. I explained to Cllr Yeo that my request that he permit me to record the interview had been made in order to assist in the preparation of a written summary of it and that the recording would be destroyed as soon as the summary had been agreed by both of us as an accurate record of what was said, in accordance with guidance issued by the Local Government Association. I confirmed that the recording would not be shared with any third party. Cllr Yeo remained unwilling for a recording to be made, and I confirmed that I would not make one. I also confirmed that he did not have my permission to make a recording either.
3. Cllr Yeo expressed concern that the required procedure for dealing with Code of Conduct complaints had not been followed. He said that he understood that the procedure had been altered earlier in the year and I confirmed that it had, and that he had been given details of the updated procedure. He said that he had not been provided with details of the Independent Person. I reminded him that he had received correspondence from me and others, most recently my email to him of 28

August 2025, advising him of the identity of the Independent Person and telling him that he was at liberty to contact them. I said that I would arrange for him to be sent Mr Powell's contact details, which I subsequently did by email dated 11 September 2025.

4. I advised Cllr Yeo that I had looked at his training record posted on Shaftesbury Town Council's website and noted that it indicated that he had not undertaken the Code of Conduct (Standards) training, and that I had obtained confirmation from the Town Clerk that according to her records this information is correct. I asked Cllr Yeo why he had not undertaken the training, and he said that he was not aware that he was required to do so. I reminded him that by signing the declaration of acceptance of office in the aftermath of having been elected to Shaftesbury Town Council, he became bound by Shaftesbury Town Council's Code of Conduct, and I directed him to the opening sentence in the section of it headed 'Application of the Code of Conduct'. Cllr Yeo asked me whether training about the Code of Conduct is compulsory, and I stated that it is; I directed him to paragraphs 8.1 and 8.2 of the section of the Code headed 'Complying with the Code of Conduct' and I advised him that I had seen emails sent to him by the Town Clerk reminding him of his obligations under the Code. Cllr Yeo said that he is a single parent and works full time, that he was unaware that he is obliged to undertake training about the Code and that he considers that his conduct has been entirely proper.
5. As a preliminary point I referred Cllr Yeo to the letter dated 23 July 2025 that he had received from [REDACTED] and my email of 9 September 2025. I confirmed that to the extent that the complaints referenced a breach of the Code in relation to non-declaration of a disclosable pecuniary interest, that aspect of the matter had been referred to the Police and no longer forms part of the scope of my investigation. I said that he is aware from the letter and the email that the investigation is now proceeding on the basis of a possible breach of the Code provisions relating to the disclosure of an other registerable interest and the seeking of dispensations in relation to that interest.
6. I referred Cllr Yeo to the paragraph of the Code of Conduct numbered 9 and headed 'Interests' and the provisions of Appendix B, and to paragraph 13 (headed Code of Conduct and Dispensations) of Shaftesbury Town Council's Standing Orders. I reminded him that he had received correspondence from the Town Clerk and Dorset Council's Monitoring Officer about his obligations under the Code of Conduct in relation to the disclosure of other registerable interests and the seeking of dispensations.
7. I advised Cllr Yeo that I had noted that the minutes of the Town Council meetings held on 17 December 2024 and 11 March 2025 stated that he had declared an interest in the agenda items relating to the Mampitts Lane project, as Chairman of the Mampitts Lane Community Land Trust CIO. I asked him why he had not sought a dispensation to enable him to remain in the room, take part in the discussion and vote on the items numbered 7 on the agenda for the Town Council meeting held on 17 December 2024 and 4 on the agenda for the Town Council meeting held on 11 March 2025. Cllr Yeo stated that he did not need a dispensation, and I asked him why he considered this to be the case. He said that the basis for his belief is that neither agenda item related to The Mampitts Lane Community Land Trust CIO, but rather to the process for procuring the services of an architect to advise in

connection with the development scheme that the Town Council is promoting – the discussion did not focus on the CIO or any application or proposals made by it. The CIO is not involved with and has no contractual or financial relationship with the Town Council in relation to the Mampitts Lane site. Neither Cllr Yeo nor the CIO stands to benefit financially or otherwise from the architect selection process mentioned in the agenda items and Cllr Yeo considers that his participation in the discussion is not related to the other registerable interest (his position as a trustee of the CIO) that he has notified under the Code. He has received advice to this effect and he will forward a written summary of that advice to me on 15 September.

8. Cllr Yeo stated that he regards the complaints as malicious and vexatious and said that he could talk all day about Shaftesbury Town Council's unlawful actions in relation to the proposed development of the Mampitts Lane site and the improper actions of the Town Clerk in relation to the submission of the planning application for the Town Council's preferred development scheme. Cllr Yeo stated that he has every right to speak out and that the complainant's action in making the complaints is vexatious and born of malice as the complainant is one of those behind the making of the rival bid for the funds for the development of the Mampitts Lane site, that bid having been submitted in competition with the bid made by the CIO.
9. I asked Cllr Yeo whether there was anything he wanted to add before the interview was concluded. He reiterated that he believed that the complainant's motive in making the complaints was malicious and that he had an axe to grind, going back to events at a committee meeting in 2020 that he (Cllr Yeo) considered was being held unlawfully.
10. I explained that the next step is for me to prepare a note of the interview, which I will aim to forward to him by the end of the coming week (19 September). I stated that I will aim to complete work on my draft report within the next four weeks after which it will go initially to the Monitoring Officer and the Independent Person, then to Cllr Yeo and the complainant before being finalised and submitted to the Monitoring Officer for a decision to be made, in accordance with paragraphs 6.H and 6.I of the Arrangements for dealing with Code of Conduct complaints against Councillors.

Appendix E

Written Statement submitted by Cllr Peter Yeo attached

Appendix F

**Comments on draft report submitted on behalf of Cllr Peter Yeo with
comments on them made by Investigating Officer in red ink**

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