

# Supporting Documents.

## 4 Supporting Documents.

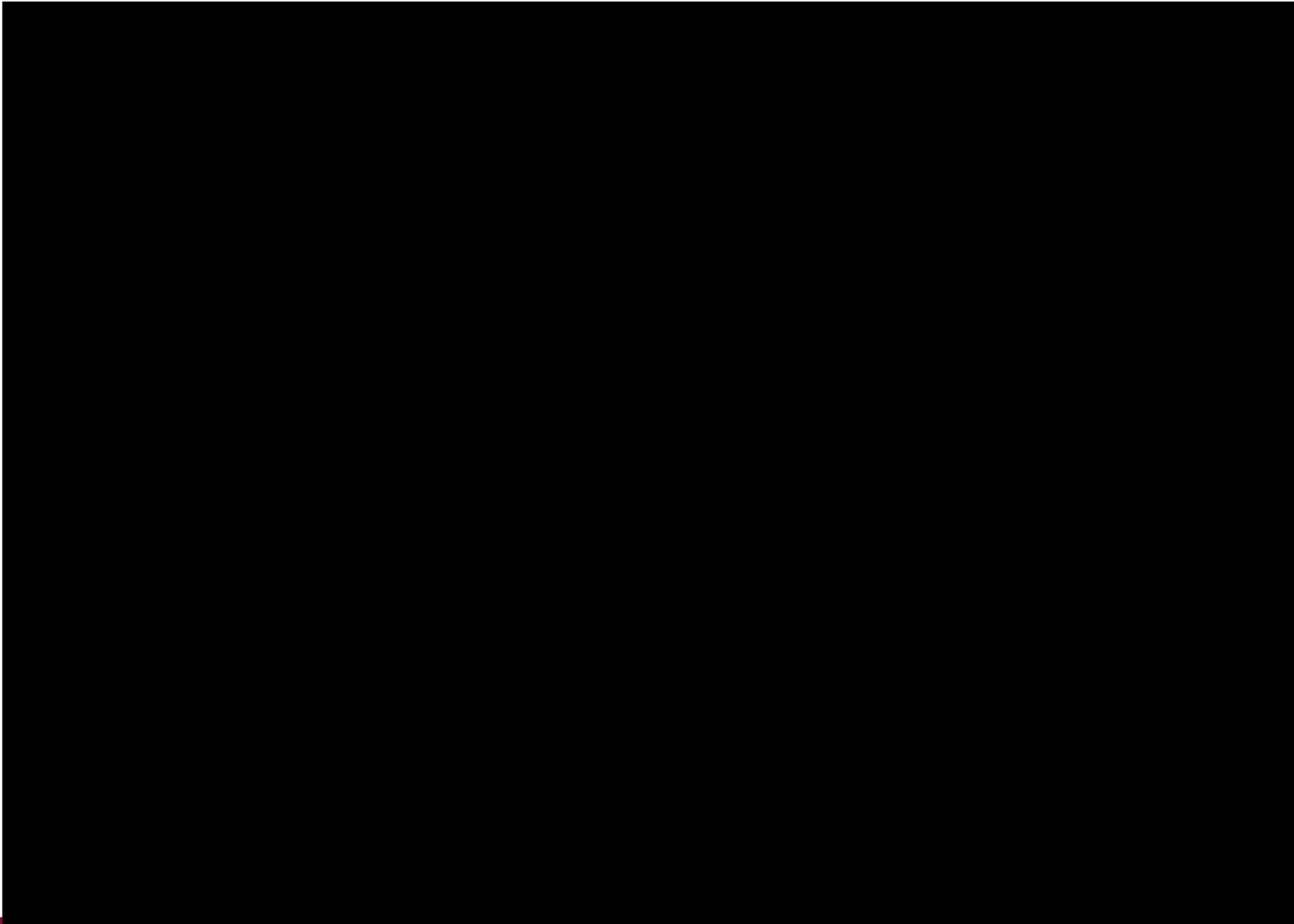
- 4.25 Our client took a photo of Cristian undertaking leaf clearing works across the home on the 8<sup>th</sup> April 2021. The photo shows a machine being used to transport the leaves across the property.



# Supporting Documents.

## 4 Supporting Documents.

4.26 On the 24<sup>th</sup> May 2021 our client received an invoice from EDF Energy for their electricity use between the 18<sup>th</sup> February to 20<sup>th</sup> May 2021. The second page shows the Meter Number as “D13B209323”, the same as that shown in photos at point 4.47.



# Supporting Documents.

## 4 Supporting Documents.

- 4.27 Our client received an invoice from EDF Energy on the 20<sup>th</sup> August 2021 for their electricity use within the stables for the period from 21<sup>st</sup> May to 18<sup>th</sup> August 2021. The second page shows the Meter Number as “D13B209323”, matching the photos at page 4.47.



# Supporting Documents.

## 4 Supporting Documents.

4.28 Our client took a number of photos within the property on the 12<sup>th</sup> September 2021. These pictures included images of the bathroom, bedroom, kitchen and lounge area. The images demonstrate that the Stables had been used for residential purposes for 18 months.



# Supporting Documents.

## 4 Supporting Documents.

4.29 With our client moving into the stables on 18th/19th September 2021 as Cristian moved out, our client took further photos inside the stables, spending more time there. On the 15<sup>th</sup> September 2021 our client took pictures of the Kitchen inside the stables. One of the photos included below shows the end of the kitchen with a red arrow pointing toward a Fridge Freezer. This Fridge Freezer is the same one purchased at 4.10 on the 20<sup>th</sup> April 2020.

This point is only a few days prior the commencement of our clients occupation of Tollgate Stables, which continues to this day.



# Supporting Documents.

## 4 Supporting Documents.

4.30

Our client received a further invoice from EDF Energy on the 18<sup>th</sup> November 2021 for their electricity usage from the 19<sup>th</sup> August to the 16<sup>th</sup> November 2021. The second page shows the Meter Number as “D13B209323”, matching the photos at 4.47.



# Supporting Documents.

## 4 Supporting Documents.

- 4.31 Our client took some internal pictures of the property on the 23<sup>rd</sup> December 2021, showing the residential use of the lounge area and the use of a Wood burner within the dwelling.



# Supporting Documents.

## 4 Supporting Documents.

4.32 Our client took a number of photos of the internal arrangement of the home on the 2<sup>nd</sup> January 2022. The images show the lounge and kitchen areas in detail, showing their residential nature of their use.





# Supporting Documents.

## 4 Supporting Documents.

- 4.33 Our client took another photo inside the residential dwelling on the 18<sup>th</sup> January 2022. The image shows the Woodburner within the lounge area of the Stables.



# Supporting Documents.

## 4 Supporting Documents.

4.34

Our client took a photo inside the property on the 5<sup>th</sup> February 2022 while watching the Six Nations Rugby match between Ireland and Wales. The image contains Jake Kemp, a friend of our clients who came round to watch the game. Mr Kemp has also provided a Supporting Statement which accompanies this planning submission.



# Supporting Documents.

## 4 Supporting Documents.

- 4.35 Our client received an invoice from EDF Energy on the 21<sup>st</sup> February 2022 for the period from 17<sup>th</sup> November 2021 to 17<sup>th</sup> February 2022. The second page shows the Meter Number as “D13B209323”, matching the Meter Number present within the photos at **4.47**.



# Supporting Documents.

## 4 Supporting Documents.

- 4.36 On the 20<sup>th</sup> March 2022 our client fitted a Television Mount to the wall of the lounge area with the help of Cristian. The television was subsequently fixed to the television to the mount. This further demonstrates the domestic use of the property.

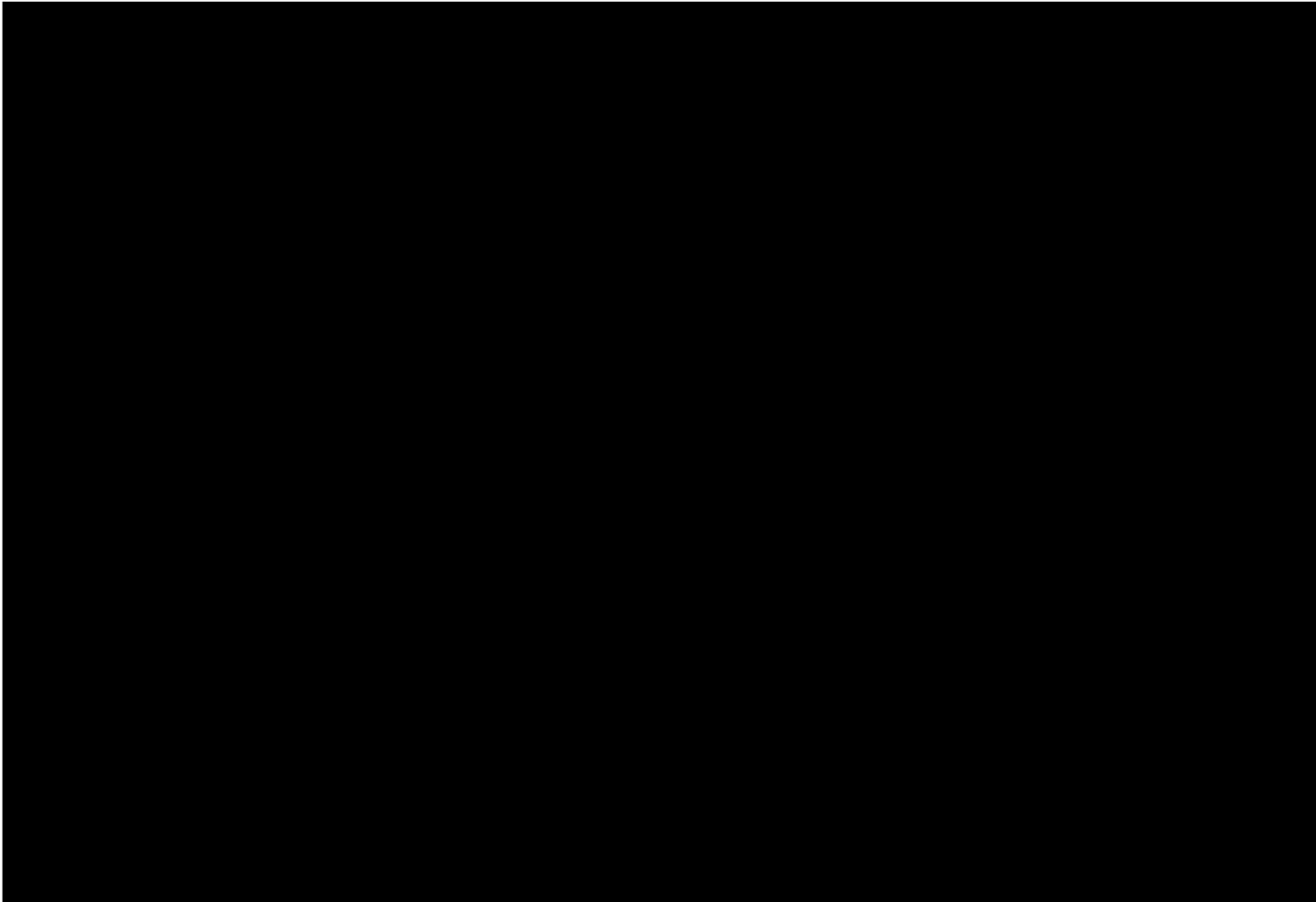


# Supporting Documents.

## 4 Supporting Documents.

4.37

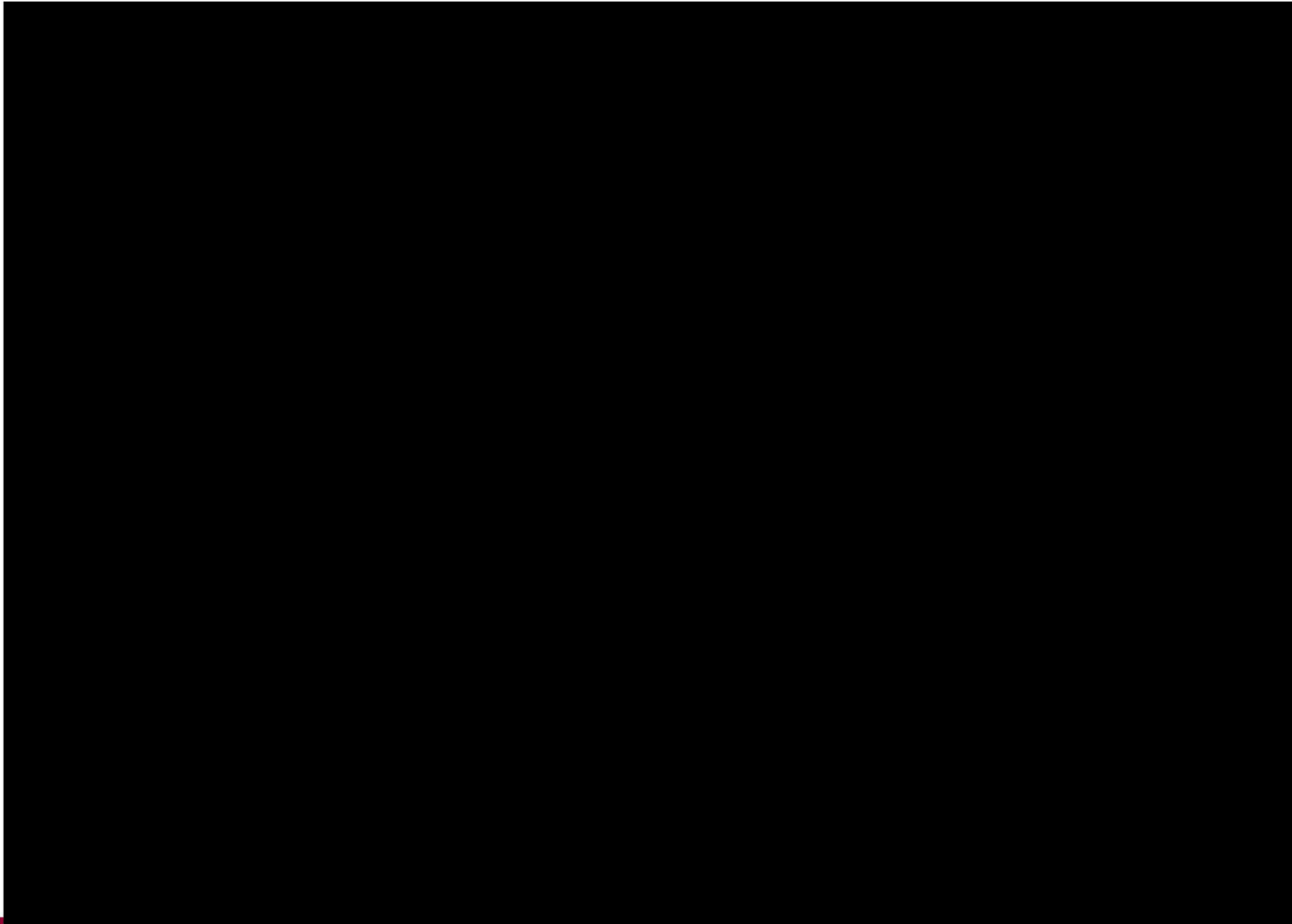
Our client received an invoice from EDF Energy on the 24<sup>th</sup> May 2022 for their electric usage for the period from the 18<sup>th</sup> February to the 20<sup>th</sup> May 2022. The second page shows the Meter Number as “D13B209323”, matching the EDF Meter which serves the stables dwelling shown in images at 4.47.



# Supporting Documents.

## 4 Supporting Documents.

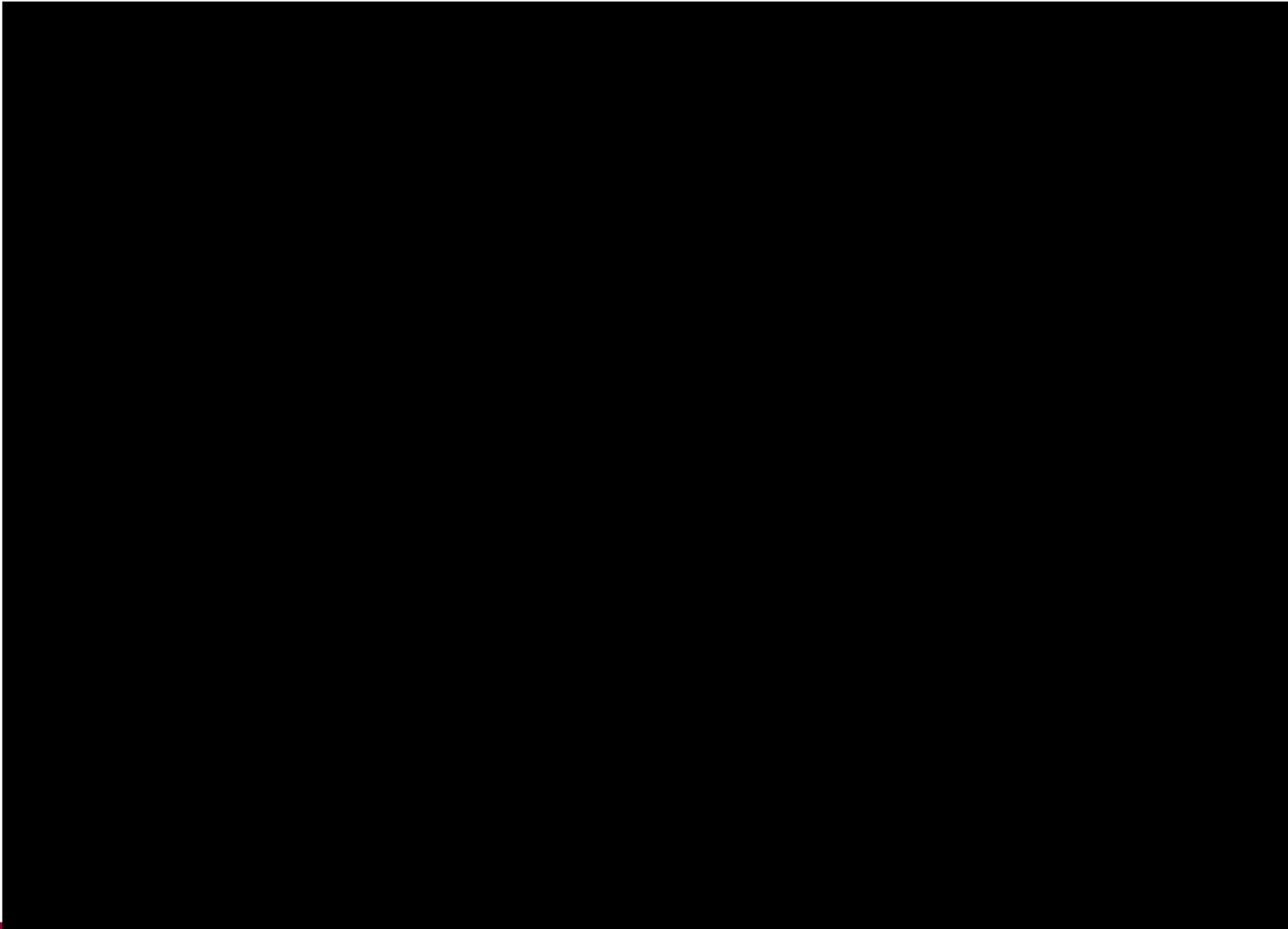
- 4.38** Our client received an invoice from EDF Energy on the 22<sup>nd</sup> August 2022 for their electric usage for the period from 21<sup>st</sup> May to 18<sup>th</sup> August 2022. The second page shows the Meter Number as “D13B209323”, matching the photos of the meter at **4.47**, showing that these letters relate to the separate energy supply of the residential stables.



# Supporting Documents.

## 4 Supporting Documents.

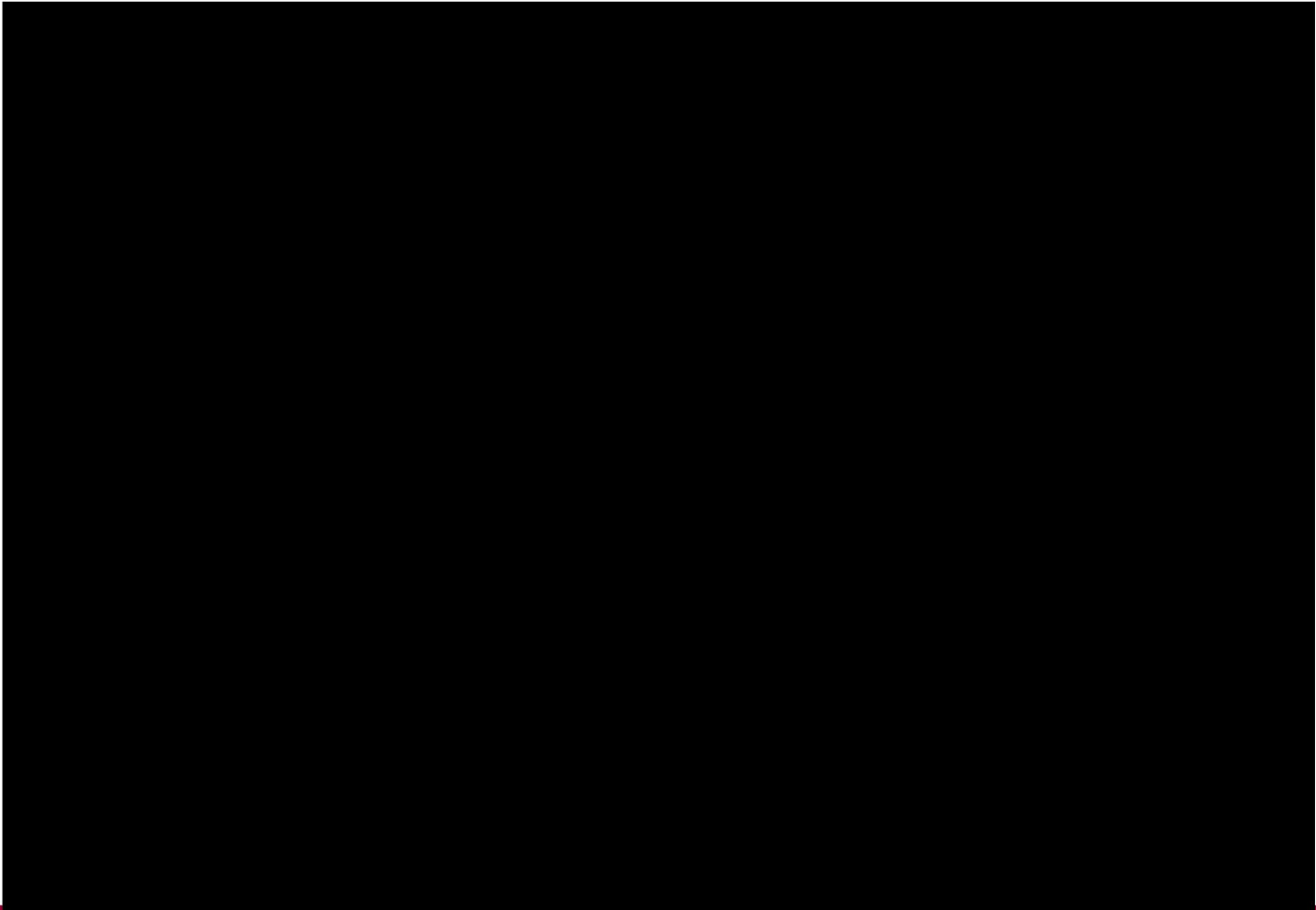
- 4.39** Our client received an invoice from EDF Energy on the 18<sup>th</sup> November 2022 for their electric usage for the period from 19<sup>th</sup> August to 16<sup>th</sup> November 2022. The second page notes the Meter Number as “D13B209323”, matching the images of the meter serving the stable property at **4.47**.



# Supporting Documents.

## 4 Supporting Documents.

- 4.40** Our client received an invoice from EDF Energy on the 20<sup>th</sup> February 2023 for their electric usage for the period between the 17<sup>th</sup> November 2022 to 16<sup>th</sup> February 2023. The second page includes the Meter Number, noted as “D13B209323”, which matches the photographs taken of the meter serving the stables at **4.47**.

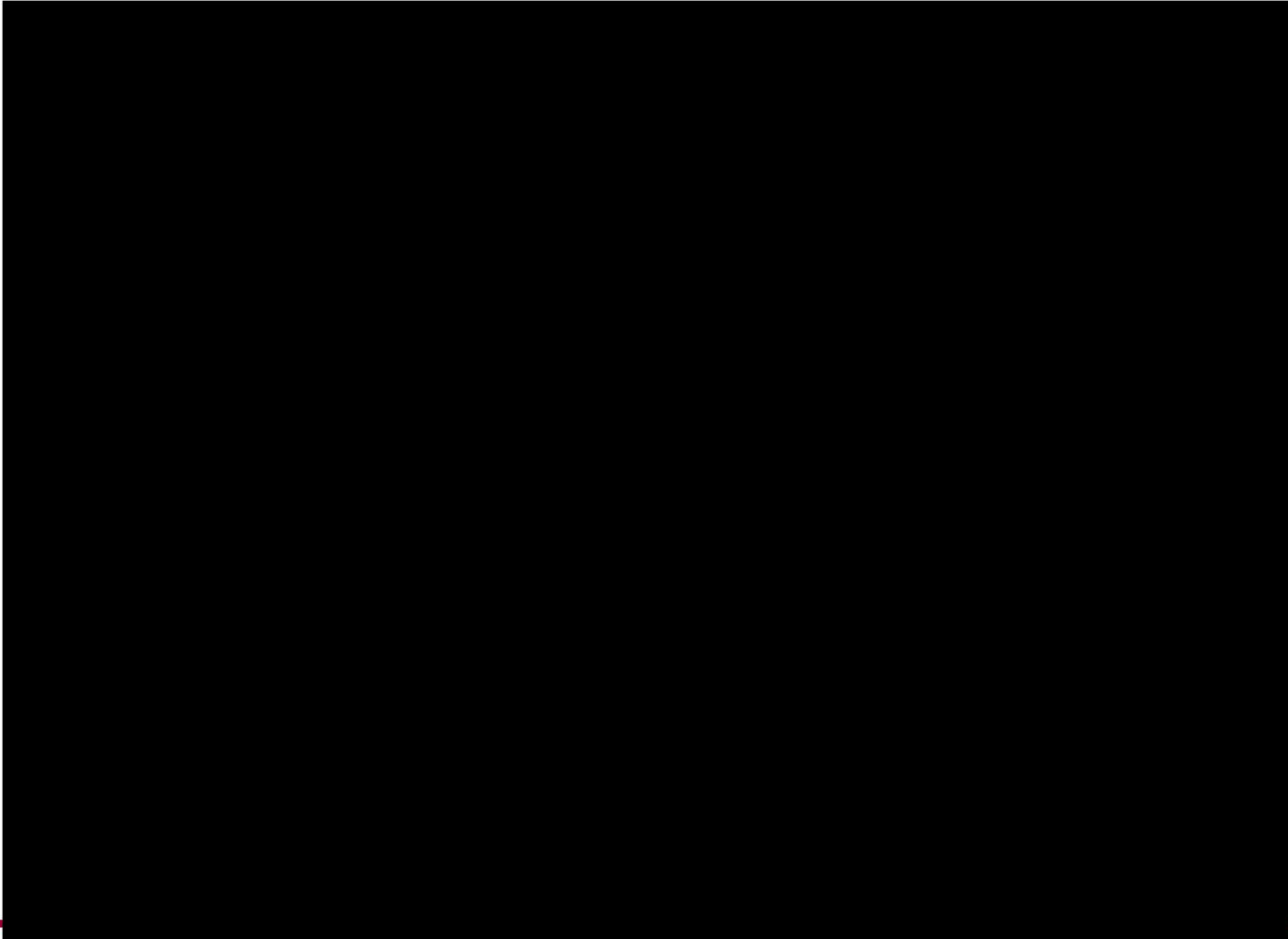




# Supporting Documents.

## 4 Supporting Documents.

- 4.41 Our client received a letter from EDF Energy on the 25<sup>th</sup> May 2023 relating to their energy usage between 11<sup>th</sup> December 2020 to the 21<sup>st</sup> May 2023. The second page shows the Meter Number as “D13B290323”, matching the meter photos taken in January 2024 at 4.47.



# Supporting Documents.

## 4 Supporting Documents.

4.42 Our client took internal pictures of the stables home on the 10<sup>th</sup> June 2023. The pictures show the lounge area of the home, which continued to be used for residential purposes by our client.



# Supporting Documents.

## 4 Supporting Documents.

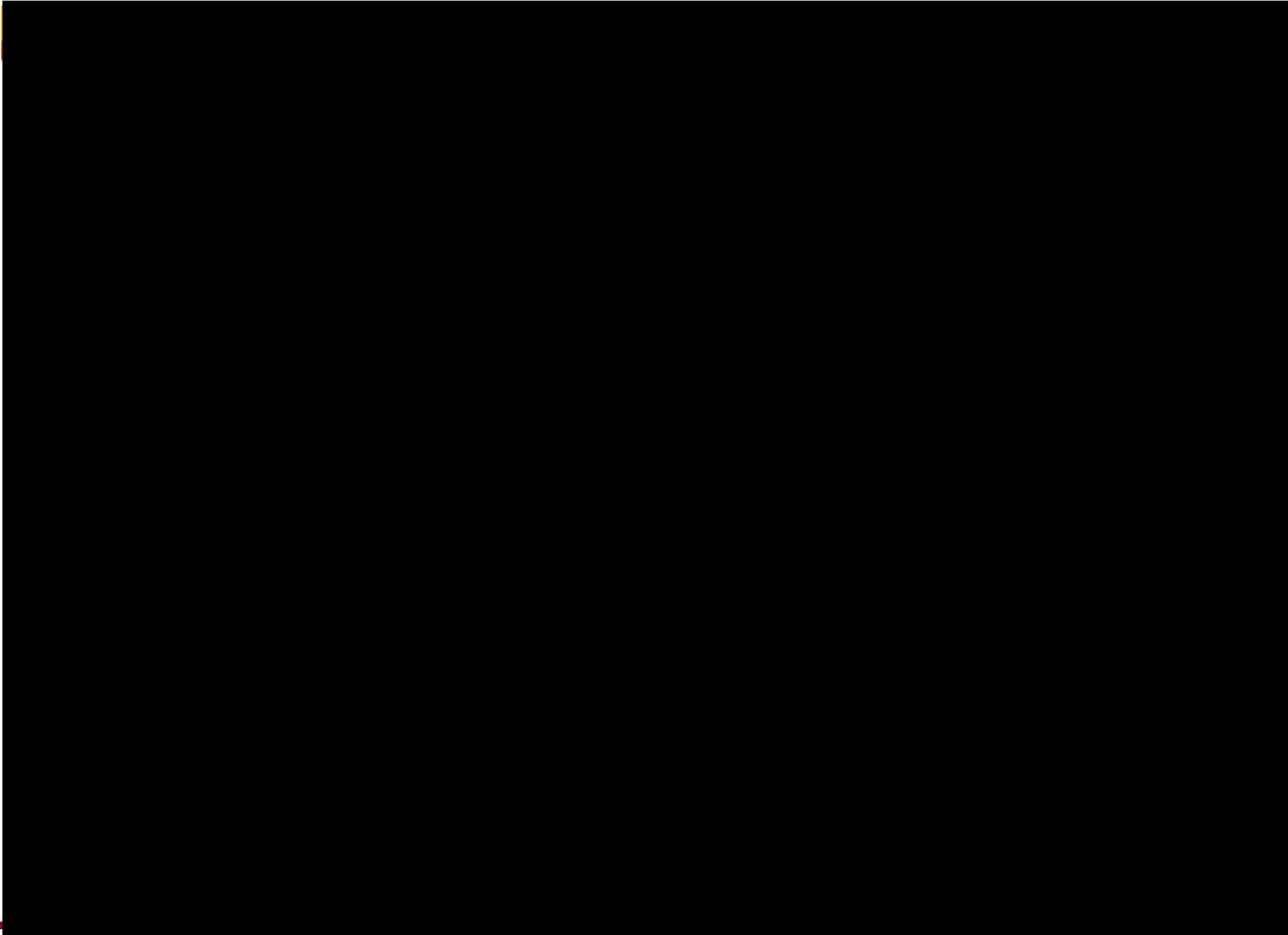
- 4.43 Our client received an invoice from EDF Energy on the 20<sup>th</sup> July 2023 for their energy usage for periods between 22<sup>nd</sup> May to 30<sup>th</sup> June 2023 and between 1<sup>st</sup> July to 17<sup>th</sup> July 2023. The second page shows the Meter Number as “D13B209323”, matching the images taken at 4.47.



# Supporting Documents.

## 4 Supporting Documents.

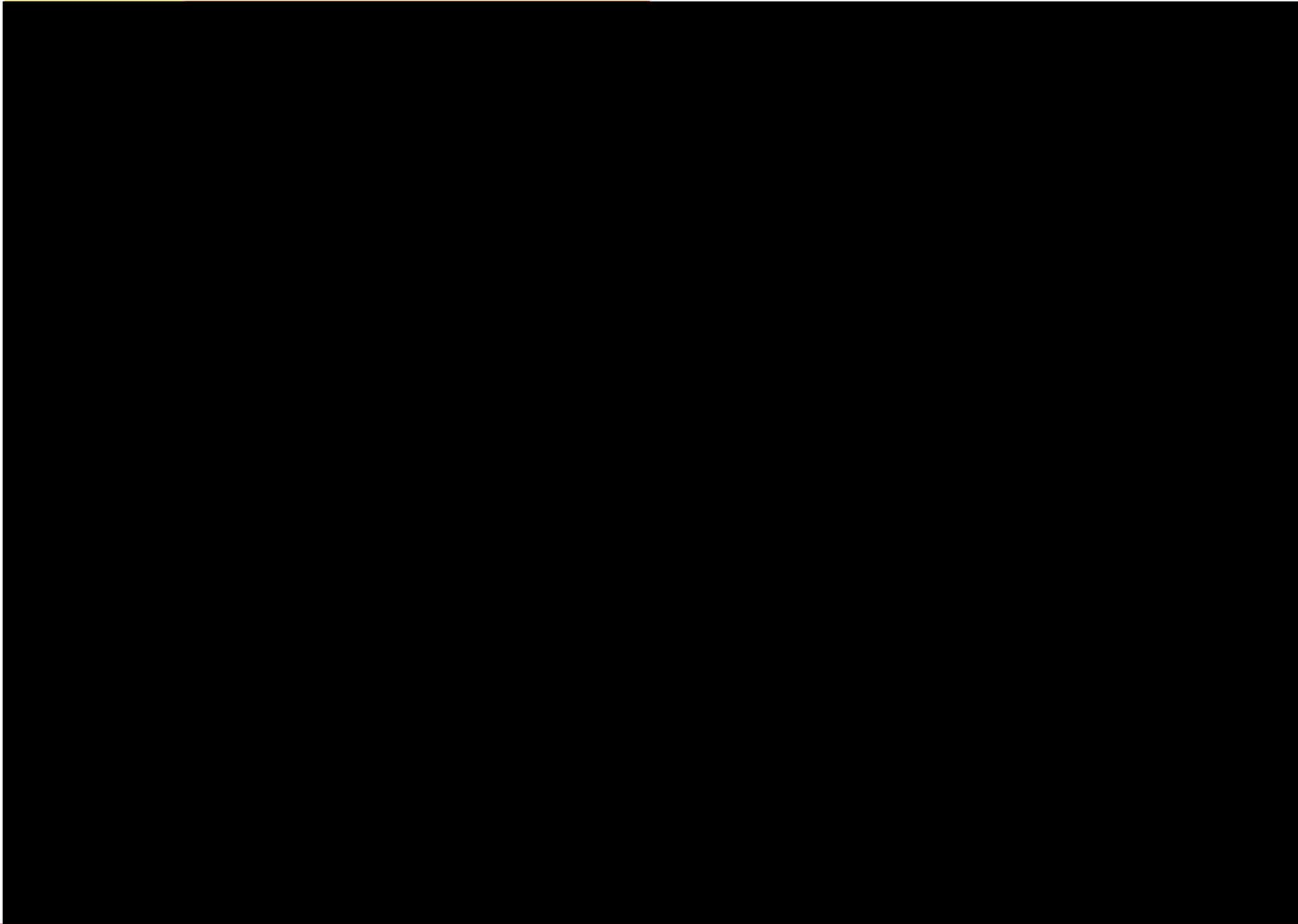
- 4.44 Our client received an invoice from EDF Energy on the 20<sup>th</sup> August 2023 for their energy usage for the period from 18<sup>th</sup> July to 17<sup>th</sup> August 2023. This invoice shows the Meter Number as “D13B209323”, matching the photos at point 4.47.



# Supporting Documents.

## 4 Supporting Documents.

- 4.45 Our client received an invoice from EDF Energy on the 21<sup>st</sup> September 2023 for their energy usage between the 18<sup>th</sup> August to 17<sup>th</sup> September 2023. The second page notes the Meter Number as “D13B209323”, the same as the meter number within the photos at 4.47.



# Supporting Documents.

## 4 Supporting Documents.

- 4.46 On the 4<sup>th</sup> November 2023 our client took some photos around the property, showing the stables to the rear of the log pile, showing the stables with a small solar panel erected to its frontage and showing the Kraftwerk Battery the Solar Panel is connected to within the Stables.



# Supporting Documents.

## 4 Supporting Documents.

4.47

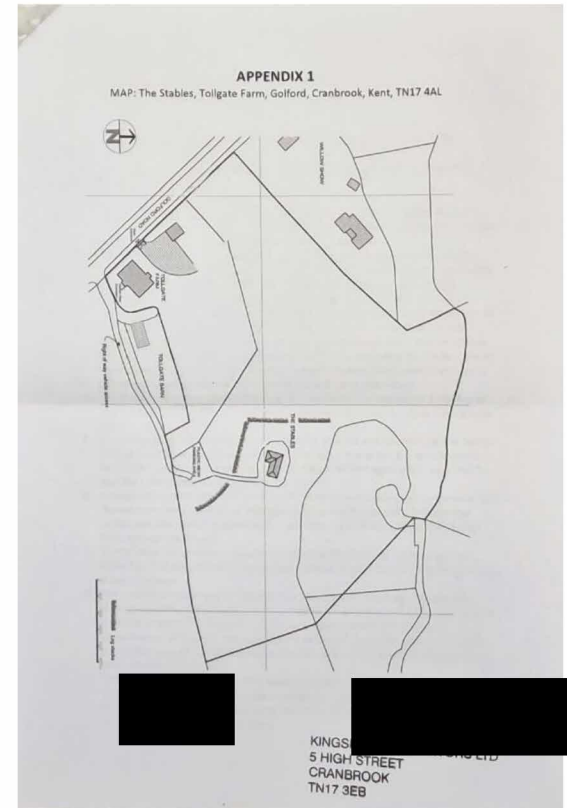
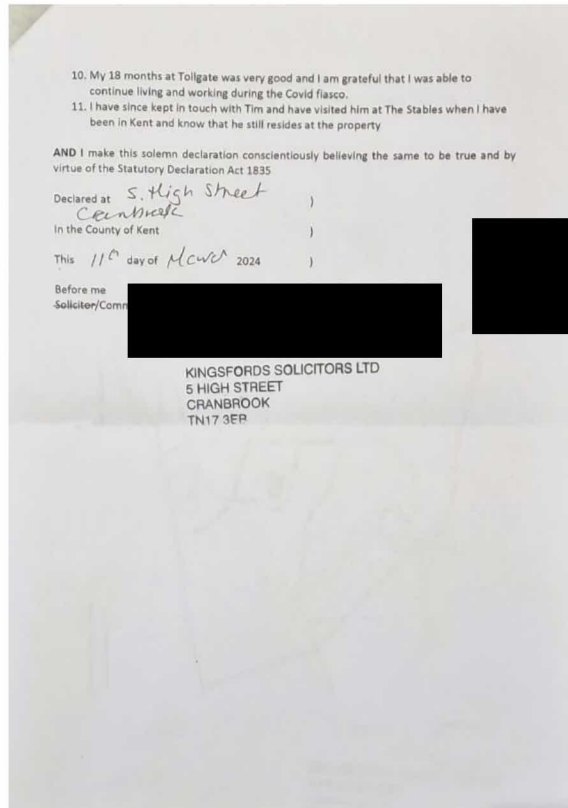
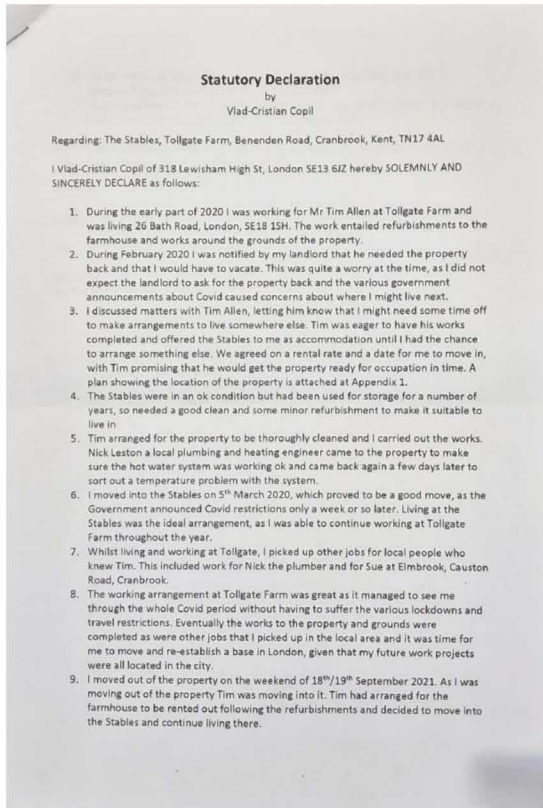
On the 15<sup>th</sup> and 29<sup>th</sup> January 2024 our client took photos of their Electricity Meter which serves the stable dwelling, which can be seen in the background of the photos. The bottom right photo shows the Meter, noting “EDF Energy” and “D13B209323” Meter Number.



# Supporting Documents

## 5 Supporting Statements

5.1 Supporting this application are a number of Statutory Declarations and Supporting Letters which confirm Cristian and our clients use of the property for a period in excess of 4 years. Shown below is a statutory declaration from Mr Vlad-Cristian Copil. Cristian Copil confirms that the Stables were used for residential purposes by themselves for the period from the 5<sup>th</sup> March 2020 until the 18/19<sup>th</sup> September 2021. Mr Copil also confirms that our client took occupation of the home on Cristian's leaving the property and that the home has since been used for residential purposes by our Client.





# Supporting Documents

## 5 Supporting Statements

5.3 Below is a Statutory Declaration from Mr Nick Leston. Mr Leston is a Boiler and Heating engineer who lives in the local area and has worked on the property for over ten years. The declaration confirms Cristian's residential use of the structure and our clients use of the property since Cristian left in September 2021. The declaration also confirms that Nick Leston has carried out a number of works relating to the residential use of the property over the last four years.

### STATUTORY DECLARATION

Mr Nick Leston

In relation to: The Stables, Tollgate Farm, Benenden Road, Cranbrook, Kent, TN17 4AL

I, Nick Leston, of Swattenden Barn Stables, Swattenden Lane, Cranbrook, TN17 3PR, do SOLEMNLY AND SINCERELY DECLARE the following:

1. I am a local boiler and heating engineer and have carried out work for Tim Allen at Tollgate Farm for over 10 years.
2. I received a call from Tim on Sunday 1<sup>st</sup> March 2020 asking me for assistance with the Stable building located to the rear of Tollgate Farm, identified by the Location Plan attached at Appendix 1. Tim explained that he and his builder, Vlad-Cristian Copil "hereafter referred to as Cristian" were seeking to use the Stables for Cristian to live in while he was working on the property in order to overcome the worsening Covid restrictions and that Tim would like the immersion and hot water cylinder checked to make sure that it was fully working and compliant before Cristian moved in.
3. Given the urgency, further impending Covid restrictions and full diary on the following days, I agreed to pop round that afternoon and check everything over for him.
4. Whilst checking the installation Tim informed me that Cristian was carrying out some refurbishment works to the farmhouse and landscape works in the grounds that he was keen to get completed as soon as possible and was worrying that the Covid restrictions would force Cristian to cease work on the property. To overcome the Covid restrictions Tim planned to rent the Stables to Cristian, and that rent for the Stables constituted part of his pay for work carried out at Tollgate Farm. I was quite pleased at hearing this, as Cristian is an extremely good tradesman and having him live nearby would be a help to me and the few renovation projects, I have permission for at home.
5. I completed the checks to the immersion heater and cylinder, without finding any problems and issued my invoice the following day.
6. On 5<sup>th</sup> March 2020 I received a call from Cristian, asking for my guidance on how to adjust the temperature on the immersion heating as the hot water was not as hot as he would like it. These fittings are quite fiddly to adjust so I popped in to see him on my way home from work to re-set the temperature. On visiting the property, I discussed some work at my home that I needed carrying out, which Cristian agreed to take a look at for me. We also discussed the Covid issues that were surrounding us at that time, with the Government announcements of travel bans and how his living at the Stables would be a great solution for all concerned to overcome any greater restrictions that might drop on us.
7. Of course, restrictions on travel and lockdown happened only a couple of weeks later and Cristian continued living at the Stables. Once it was safe to do so, Cristian came over to my home to take a look at the building and tree works I needed at home and he carried out those works during August 2020, all while he was still living at Tollgate Stables.

8. During the following year I visited Tollgate on three occasions in response to calls from Tim to take a look at items that needed attention. During these visits Cristian was working on the property and living at the Stables.
9. In September 2021, Tim informed me that Cristian was moving out of the Stables to take up residence in Lewisham, London, and that on his departure Tim would move into the Stables so that he could rent out the main dwelling on an extended basis. Tim's moving into the property required the need for some changes to the taps and shower fittings, which I duly carried out.
10. Following Tim moving into the Stables I have continued to provide plumbing and heating services to him and since that time have always called at the Stables first, given that is Tim's main residence, and that Tollgate Farm is a holiday let.
11. Having visited the property again only recently, I can confirm that Tim Allen continues to live at the Stables.

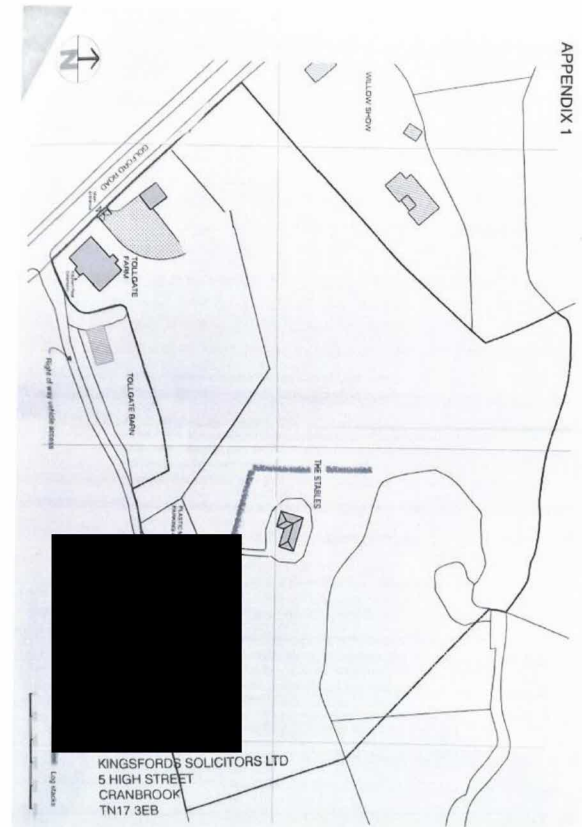
AND I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declaration Act 1835

Declared at *5, High Street, Cranbrook*  
In the County of Kent

This *5<sup>th</sup>* day of *March* 2024

Before me *Nick Leston*  
Solicitor/Commissioner

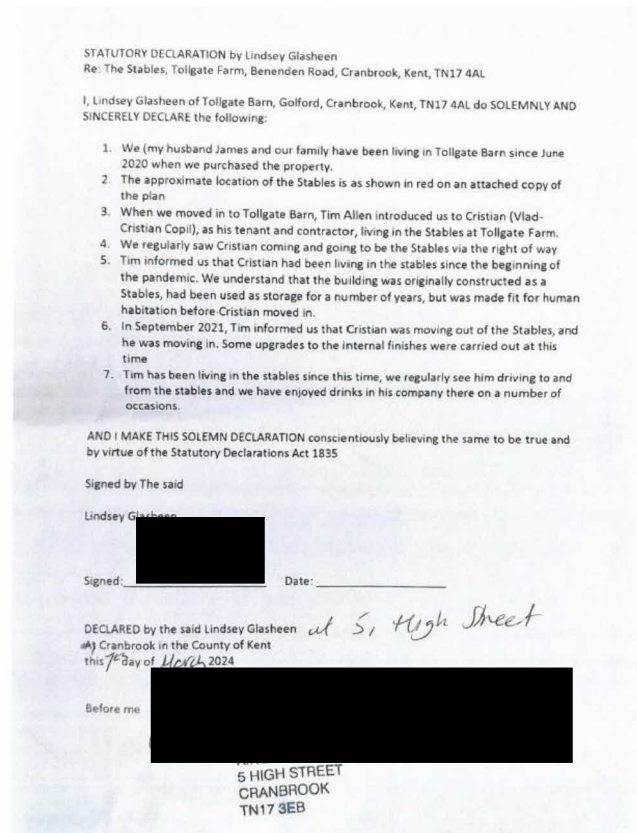
KINGSFORDS SOLICITORS LTD  
5 HIGH STREET  
CRANBROOK  
TN17 3ER



# Supporting Documents

## 5 Supporting Statements

- 5.4 Below is a Statutory Declaration from Lindsey Glasheen. Mrs Glasheen lives at Tollgate Barn and is a neighbour to Tollgate Farm and Tollgate Stables, the property subject of this Lawful Development Certificate.
- 5.5 The declaration confirms that our client introduced Mrs Glasheen to Cristian who was in residence at the Tollgate Stables on the date that Mrs Glasheen and her husband took occupation of Tollgate Barn in June 2020.



# Supporting Documents

## 5 Supporting Statements

5.6 Below is a Statutory Declaration from Mr Tim Allen, our client and the applicant for this Lawful Development Certificate. The declaration confirms the historical use of the property, Cristian's use of the property from the 5<sup>th</sup> March 2020 and their use of the property since Cristian moved out in September of 2021. Appendix 2 to this Statutory Declaration is on the next page.

### STATUTORY DECLARATION

by  
Mr Tim Allen

In relation to: The Stables, Tollgate Farm, Benenden Road, Cranbrook, Kent, TN17 4AL

I, Tim Allen of Tollgate Farm Stables, Golford, Cranbrook, Kent, TN17 4AL do SOLEMNLY AND SINCERELY DECLARE the following:

1. I am the owner of Tollgate Farm, which includes the farmhouse and the Stables, which is the property subject to this Declaration, as identified by the Location Plan attached at Appendix 1.
2. My family have owned Tollgate Farm for over 32 years and before the property was purchased by me in 2018 from my mother.
3. During the period when my family owned the property, my mother lived in the Stables for a period of 18 months whilst her new home was renovated. Following the completion of this work, the property was once again used as a storage building, even though it was fitted out as a fully functioning home.
4. In February 2020 I had a builder working on the property carrying out refurbishments to the farmhouse and landscape works to the Grounds. The Builder, Vlad-Cristian Copil "hereafter referred to as Cristian" had been given notice on his property rental in Bath Road, London, and was in desperate need of accommodation.
5. Given that the Stables was not being used and that I was very keen for Cristian to remain at the property to finish off all of the works that were underway at the time, I offered to him the opportunity to live in and rent the Stables for use as his independent dwelling.
6. Cristian was very pleased with the arrangement and asked if he could move in on 5<sup>th</sup> March 2020. A copy of the tenancy agreement is attached at Appendix 2.
7. The Stables were in good condition but needed cleaning, a few jobs done and the hot water needed sorting out. Therefore, I contacted the local trades that help me with these things and asked them to come over asap in order to make the property ready for Cristian to move in.
8. Cristian continued living at the property for the following eighteen months. The arrangement worked well for both of us, particularly during the Covid lockdown period, which would have delayed the building and landscape works considerably.
9. In September 2021 Cristian informed me that he wished to move on, which was fine. All of the works had been completed sometime before that, Cristian had been doing jobs for local people and this had all come to an end.
10. It actually suited me that Cristian was moving out, as it enabled me to have a dedicated space of my own, having previously split my time between the farm house, which has also been in use as a holiday let, and my mother's house at Causton Road, Cranbrook. Therefore, I planned to move into the Stables once Cristian moved out and arranged for some works to be carried out in the Stables in preparation of occupying it.

11. Cristian moved out on the weekend of the 18<sup>th</sup>/19<sup>th</sup> September 2021 and I moved in on the same weekend.
12. Since that time, I have continuously lived at the Stables and treat this as my permanent residence.
13. During my period of occupation at the Stables, I have had gatherings and friends over for parties/dinner and have forged good friendships with my new neighbours who have moved into the locality.
14. I have also had various works carried out by local tradesmen, all of whom arrive at the Stables via the access way to meet me and discuss what is needed.
15. When taking Cristian's period of occupation and my period of occupation at the property, it has now been in continuous use as an independent dwellinghouse for a period in excess of 4 years, which is supported by confirmation statements from friends, family, tradesmen and the former tenant of the property.

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

Declared at *5, High Street,*  
*Cranbrook* )  
In the County of Kent )

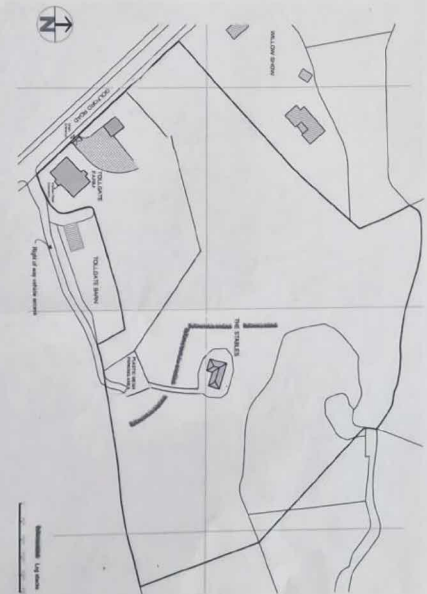
This *11<sup>th</sup>* day of *March* 2024 )

Before me )  
~~Solicitor~~/Commissioner for Oaths )

KINGSFORDS SOLICITORS  
5 HIGH STREET  
CRANBROOK  
TN17 3EB

### APPENDIX 1

MAP: The Stables, Tollgate Farm, Golford, Cranbrook, Kent, TN17 4AL

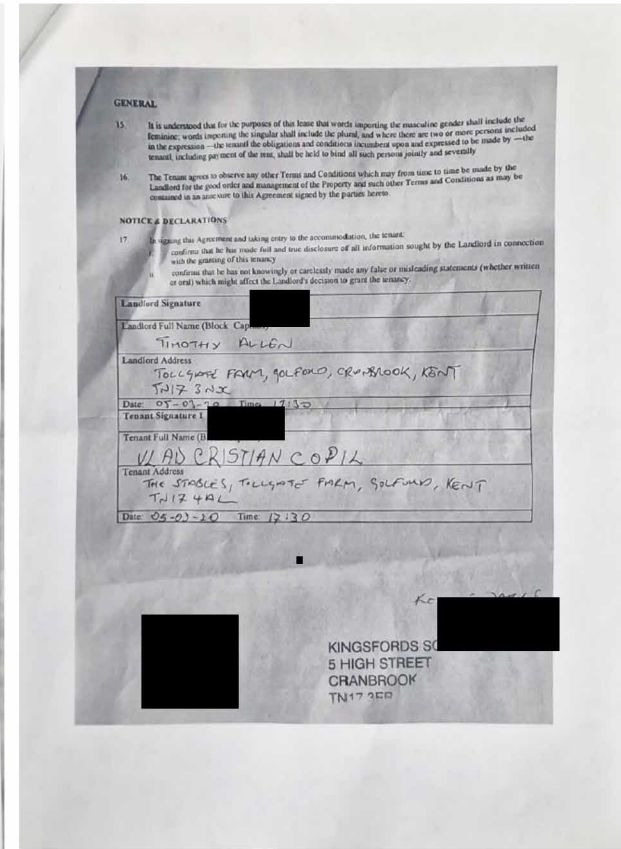
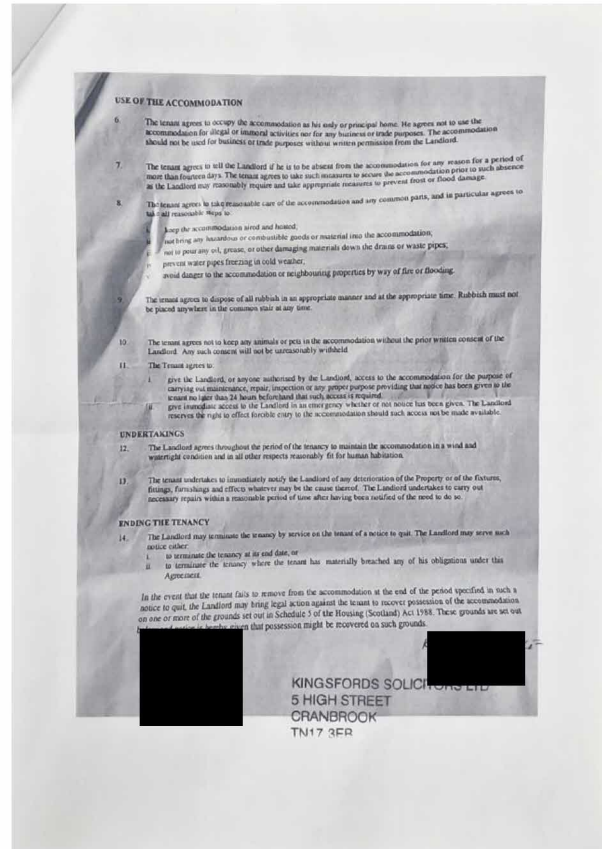
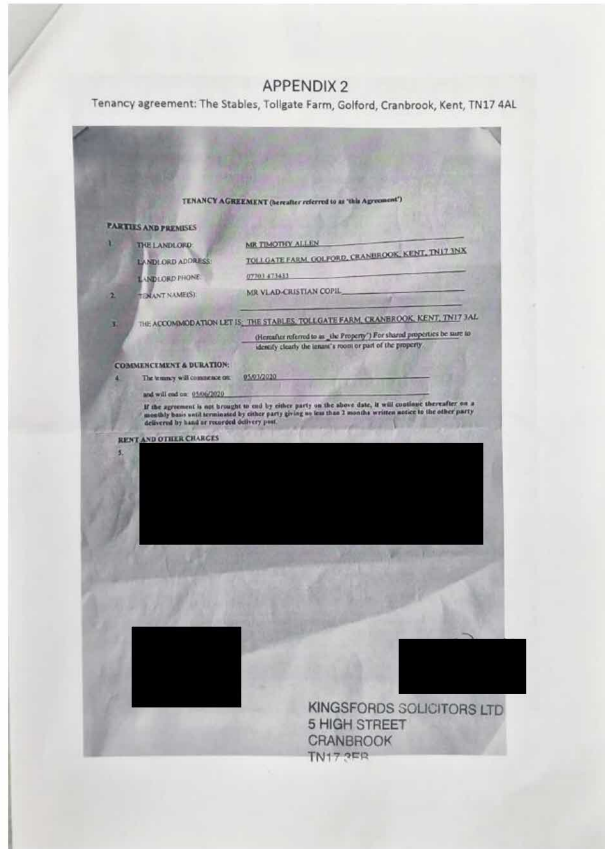


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CRANBROOK  
TN17 3EB

# Supporting Documents

## 5 Supporting Statements

5.7 Below is Appendix 2 to Tim Allen's Statutory Declaration on the previous page. This documentation sets out the tenancy agreement with Cristian Copil and evidences Cristian's occupation of Tollgate Stables prior to our client taking occupation on 19<sup>th</sup> September 2021, the same weekend that Cristian vacated the property.



# Supporting Documents

## 5 Supporting Statements

5.8 Below is a supporting statement from Mr Jake Kemp. Mr Kemp is a good friend of our clients and confirms that our client has resided in the property since September 2021 after a local contractor stayed in the property. The statement confirms that Mr Kemp has visited the property on multiple occasions during our clients occupation, one of which was during the Six Nations Rugby in 2022, of which we have photographic evidence, noted at Para 4.34 of this document.

### SUPPORTING STATEMENT

In Relation to; The Stables, Tollgate Farm, Golford Road, Cranbrook, Kent, TN17 3NX

I, Jason Kemp, of 20, Welland Mews, London E1W 2JW hereby state the following:

1. I have visited Tim at The Stables on several occasions including the six nations rugby in February 2022 and his birthday in May 2022.
2. Each time that I have visited the property Tim has been in occupation of it and I am aware that he moved into the property during September 2021, following a 18month to 2 year period during which a builder was renting the Stables from him.
3. I keep in regular contact with Tim and I can confirm that Tim still resides at the Stables and that this property is his primary residence.

I believe that the facts and matters contained in this statement are true

Signed by  
Jason Kemp

Date: 5th March 2024

Signed: 

# Supporting Documents

## 5 Supporting Statements

5.9 Below is a supporting statement from Mr Simon Greenwood. Mr Greenwood is a good friend of our clients and their statement confirms that our client has taken residence in the Stable property since September 2021. The statement confirms that Mr Greenwood has visited our client multiple times over the course of their occupation.

### SUPPORTING STATEMENT

RE: The Stables, Tollgate Farm, Golford Road, Cranbrook, Kent, TN17 3NX

I, Simon Greenwood of 6 Castle Mount, Tisbury, SP3 6PP hereby state the following:

1. I visited Tim at The Stables on several occasions, notably 6<sup>th</sup> December 2021, 16-18<sup>th</sup> December 2022 and 6<sup>th</sup> August 2023. On each of these occasions we had dinner and drinks at the Stables along with another friend, Alex Brian.
2. I can confirm that Tim has been in residence in the Stables on every occasion of visiting. Tim has been living in the Stables since he started to rent out the farmhouse in September 2021.
3. The Stables property is a very comfortable home, containing all of the things one needs to service everyday life.
4. I am aware that Tim continues to live at the property and that the Stables is treated as his permanent residence.
5. I am also aware that Tim had a tenant living at the Stables before he moved into the property and that the tenant has resided at the home since early March 2020.

I believe that the facts and matters contained in this statement are true

Signed by the said  
Simon Greenwood

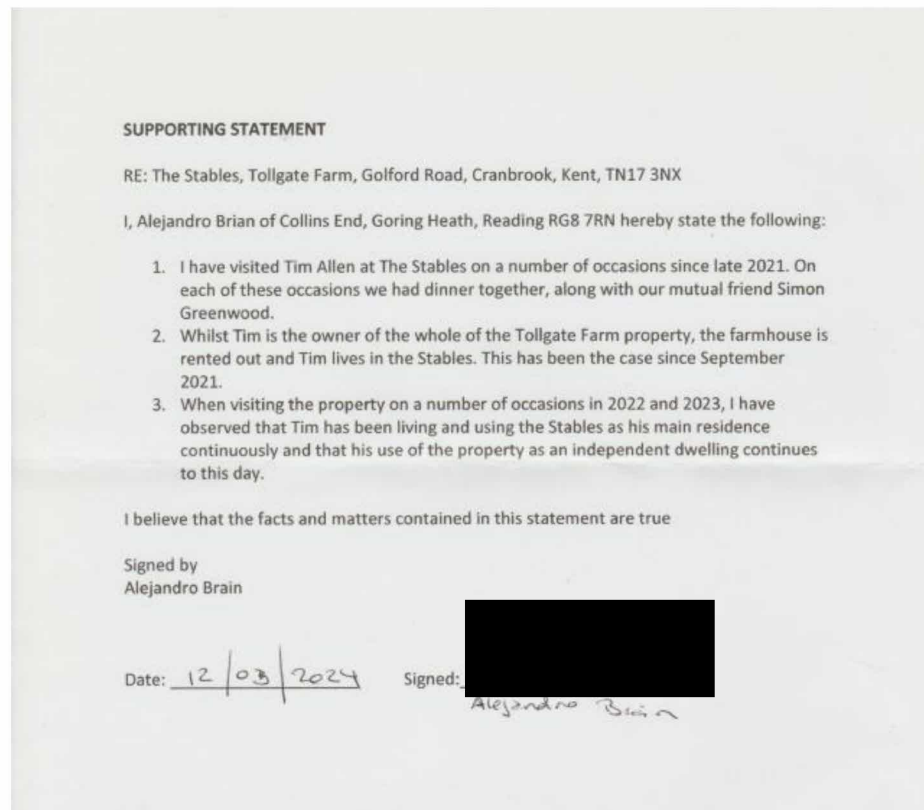
Date: 7<sup>th</sup> March 2024

Signed: 

# Supporting Documents

## 5 Supporting Statements

- 5.10 Below is a supporting statement from Mr Alejandro Brian. Mr Brian confirms that he has visited our client on a number of different times since their occupation of the property in September 2021. The statement also confirms that our client continues to use the structure for residential purposes.



# Timeline

## 6 Development Timeline.

- 6.1 4<sup>th</sup> October 2005 – The Stable Block was approved under Planning Reference 05/02229/FUL with works on the foundations commencing afterwards. (See 4.1)
- 6.2 Late 2013 – Construction works above the foundations commenced on the stables.
- 6.3 Early 2014 – The stables was completed and provided with water and electricity. The Stables structure was subsequently used for storage purposes.
- 6.4 28<sup>th</sup> February 2014 – Elizabeth Mazzola sent a letter to Jo Smith, the Planning Compliance Officer, outlining the use of Tollgate Farm at this point and providing some clarification on the Stable Outbuilding. (See 4.2)
- 6.5 19<sup>th</sup> December 2016 – Our client submitted an application for the Stables to be an Ancillary Annex serving the residential dwelling of Tollgate Farm. (See 4.3)
- 6.6 6<sup>th</sup> June 2017 – Our clients application for annex accommodation was refused by Tunbridge Wells Borough Council. (See 4.4)
- 6.7 25<sup>th</sup> February 2020 – a number of photos were taken by our client of the inside of the stables structure. Photos show the structure being used for storage purposes. (See 4.5)
- 6.8 5<sup>th</sup> March 2020 – Cristian who had been undertaking works across the property, began living inside the stable structure due to the introduction of covid travel constraints and the large amount of time he was spending at the property undertaking work. Our client paid Cristian and allowed him to live in the structure, with accommodation being part of Cristian’s pay.
- 6.9 25<sup>th</sup> March 2020 – Our client took a picture of the bathroom tap installed within the property, evidencing the residential use which commenced in early March. (See 4.6)
- 6.10 27<sup>th</sup> March 2020 – Our client took a picture identifying the cooker switch within the kitchen. A hob is present within the kitchen, further showing the residential use having commenced. (See 4.7)
- 6.11 6<sup>th</sup> April 2020 – Tree felling works were undertaken on the property by Cristian Copil following a fallen willow on the land. (See 4.8)
- 6.12 11<sup>th</sup> April 2020 – Landscaping works were undertaken by Cristian using a Digger on the land. (See 4.9)
- 6.13 20<sup>th</sup> April 2020 – Our client purchased a Fridge Freezer for the stables property. (See 4.10)



# Timeline

## 6 Development Timeline.

- 6.14 25<sup>th</sup> April 2020 – Further tree works were undertaken by Cristian on trees which needed to be cleared, resulting in a log pile on the land. (See 4.11)
- 6.15 27<sup>th</sup> April 2020 – A piano was taken out of the Stables using a JCB and was moved to the home of Tollgate Farm. (See 4.12)
- 6.16 17<sup>th</sup> May 2020 – An image was taken outside of the Stables home showing a table to the rear of the structure where a meal was taking place, which was made in the Stables’ Kitchen. (See 4.13)
- 6.17 4<sup>th</sup> June 2020 – Following necessary tree works on the land, log piles were created either side of the driveway track on approach to the stables. (See 4.14)
- 6.18 6<sup>th</sup> June 2020 – A further photo was taken showing the log piles created adjacent to the access track on the property. The stables can be seen in the rear of the image and the wood was taken from the fallen willow and other felled trees. (See 4.15)
- 6.19 10<sup>th</sup> June 2020 – Our client was sent a receipt following the purchase of a Microwave for the residential use of the stables. (See 4.16)
- 6.20 13<sup>th</sup> June 2020 – Our client took another photo of the log piles either side of the Access Track. A vehicle can be seen on the track and the stables can be seen to the rear. (See 4.17)
- 6.21 11<sup>th</sup> July 2020 – Image showing the Kitchen of the Stable structure, having been in use for residential purposes since March 2020. (See 4.18)
- 6.22 2<sup>nd</sup> September 2020 – Following the use of the stables for residential purposes and the lack of storage space within the stables, our client needed storage space for the winter period. To provide this Fill was spread evenly across a Tarpaulin on the property. (See 4.19)
- 6.23 3<sup>rd</sup> September 2020 – After spreading fill across the Tarpaulin the day prior, Storage Containers are placed atop the fill. (See 4.20)
- 6.24 15<sup>th</sup> December 2020 – Our client received an invoice from EDF Energy for the period from 1<sup>st</sup> January to 10<sup>th</sup> December 2020. (See 4.21)
- 6.25 19<sup>th</sup> February 2021 – Our client received an invoice from EDF Energy for the period from 11<sup>th</sup> December 2020 to 17<sup>th</sup> February 2021. (See 4.22)
- 6.26 10<sup>th</sup> March 2021 – Image showing further Tree works by Cristian to the front of the Tollgate Farm home, Cristian was still living in the Stables during this period. (See 4.23)

# Timeline

## 6 Development Timeline.

- 6.27 15<sup>th</sup> March 2021 – Following tree works earlier in the week a Machine was used to transport the logs. (See 4.24)
- 6.28 8<sup>th</sup> April 2021 – Image showing Cristian undertaking leaf clearing works on the property. (See 4.25)
- 6.29 24<sup>th</sup> May 2021 – Our client received an invoice from EDF Energy for the period from 18<sup>th</sup> February to 20<sup>th</sup> May 2021. (See 4.26)
- 6.30 20<sup>th</sup> August 2021 – Our client received an invoice from EDF Energy for the period from 21<sup>st</sup> May to 18<sup>th</sup> August 2021. (See 4.27)
- 6.31 12<sup>th</sup> September 2021 – A large number of photos were taken inside the home, showing Cristian’s residential use of the stables for the last 18 months. Photos include view of the lounge, bedroom, kitchen and bathroom. (See 4.28)
- 6.32 15<sup>th</sup> September 2021 – Image showing Kitchen area of the home and its residential use. (See 4.29)
- 6.33 18/19<sup>th</sup> September 2021 – Cristian moved out of the stables after living there for 18 months since 5<sup>th</sup> March 2020. Afterwards, our client decided to take residence within the stables and planned alterations to interior decoration and furnishings.
- 6.34 18<sup>th</sup> November 2021 – Our client received a bill from EDF Energy for the period from 19<sup>th</sup> August to 16<sup>th</sup> November 2021. (See 4.30)
- 6.35 23<sup>rd</sup> December 2021 – Image showing the lounge area of the home, following the removal of the desk within the area. The image shows the woodburning stove which exits vertically via a flue. (See 4.31)
- 6.36 2<sup>nd</sup> January 2022 – Further images were taken showing the kitchen and lounge areas of the home, the fridge freezer purchased on the 20<sup>th</sup> April 2020 can be seen in the background of the photo. (See 4.32)
- 6.37 18<sup>th</sup> January 2022 – Image showing the wood burning stove within the lounge. (See 4.33)
- 6.38 5<sup>th</sup> February 2022 – An image was taken inside the property, showing our client and their friend Jake Kemp in the lounge of the stables, watching a Six Nations Rugby game between Ireland and Wales. (See 4.34)
- 6.39 21<sup>st</sup> February 2022 – Our client received an invoice from EDF Energy for the period from 17<sup>th</sup> November 2021 to 17<sup>th</sup> February 2022. (See 4.35)
- 6.40 20<sup>th</sup> March 2022 – Image showing Cristian back at the Stables helping in fitting a wall mount for a television and a subsequent image showing the television fitted to the wall. (See 4.36)

# Timeline

## 6 Development Timeline.

- 6.41 24<sup>th</sup> May 2022 – Our client received an invoice from EDF Energy for the period from 18<sup>th</sup> February to 20<sup>th</sup> May 2022. (See 4.37)
- 6.42 22<sup>nd</sup> August 2022 – EDF Energy Bill for the Stables structure, which benefits from a separate supply. (See 4.38)
- 6.43 18<sup>th</sup> November 2022 – EDF Energy Bill for the stables Dwelling. (See 4.39)
- 6.44 20<sup>th</sup> February 2022 – EDF Energy Bill for the stables Dwelling. (See 4.40)
- 6.45 25<sup>th</sup> May 2022 – EDF Energy Bill for the stables Dwelling. (See 4.41)
- 6.46 10<sup>th</sup> June 2023 – Images showing the lounge area of the stables structure. (See 4.42)
- 6.47 20<sup>th</sup> July 2023 – EDF Energy Bill for the stables dwelling. (See 4.43)
- 6.48 20<sup>th</sup> August 2023 – EDF Energy Bill for the stables dwelling. (See 4.44)
- 6.49 21<sup>st</sup> September 2023 – EDF Energy Bill for the stables dwelling. (See 4.45)
- 6.50 4<sup>th</sup> November 2023 – A number of photos were taken within and outside the stables home. Photos show the stables residential use having continued and shows the battery linked to the solar panels of the stables property. (See 4.46)
- 6.51 15<sup>th</sup> January & 29<sup>th</sup> January 2024 – Our client took photos of their Electric Meter box to confirm that the communication from EDF Energy related to their residential use of the Stables, which the meter serves. (See 4.47)

# Summary

- 7.1** This planning application seeks to demonstrate that in the balance of probability the approved stable building and its associated curtilage has been converted to a residential dwellinghouse and has been in residential use for a period in excess of four years.
- 7.2** This application is supported by Statutory Declarations and Supporting Statements confirming Mr Copil and Mr Allen’s residential use of the property from the 5<sup>th</sup> March 2020 until the present date.
- 7.3** We have shown within this statement through OS Mapping, Aerial Images, Site Images and supporting documentation that the building has been converted to a habitable dwelling and used as such since 5<sup>th</sup> March 2020.
- 7.4** Given the robustness of the evidence provided in this application, including that contained within the supporting statutory declarations and documentation, there can be no doubt that the approved stable building was converted to dwellinghouse and that the Use of the building as an Independent Residential Dwelling commenced on the 5<sup>th</sup> March 2020 and has been in continuous residential use for a period in excess of four years.
- 7.5** When contemplating the various tests of certainty, the balance of probability and whether the suite of evidence contained within the application meets those tests, we are of the view that the weight of evidence is such that one can only conclude that Tollgate Stables has been subject of residential conversion and that it has been within an Independent Residential Use for a period in excess of 4 years, that the property is therefore immune from enforcement action and that the property should now be treated as an Independent Dwelling within the C3 Residential Use Class Order.

15<sup>th</sup> March 2024

**Country House Homes Ltd**

