

**MADE IN SUPPORT OF AN APPLICATION FOR
CERTIFICATES OF LAWFULNESS UNDER S191
OF THE TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED)**

**WITNESS STATEMENT OF
CHRISTOPHER SNELL**

I, [REDACTED] Hayling Island, Hampshire, PO11 9HR **WILL SAY** as follows:

A. INTRODUCTION

- 1 I am the joint owner [REDACTED] of Woods Cottage and Tournerbury Woods, Tournerbury Lane, Hayling Island, PO11 9DL ("WC/TW"), which is registered at HM Land Registry under title number [REDACTED]. Copies of the Land Registry title register and plan appear at [REDACTED].
- 2 I make this witness statement in support of our application to Havant Borough Council pursuant to s.191 Town and Country Planning Act 1990 for the following **three** Certificates of Lawful Use or Development:
 - I. Erection of log cabin and adjoining deck;
 - II. Erection of Victorian style gazebo structure; and
 - III. Erection of marquee structure.
- 3 Save where I have expressly indicated, the contents of this witness statement are within my direct knowledge.

B. DOCUMENTS

- 4 Exhibited to this witness statement are the following documents as an Evidence Base (EB):

Photographs (EB0005 – EB0093)

- a) EB0005 - 0006 – Log cabin being erected at London home – 2008.

- b) **EB0017 -** Taking apart log cabin from London home – 2010.
- c) **EB0018 - 0019 -** Build of log cabin at TW – 2010.
- d) **EB0020 - 0023 -** Build of deck adjoining Log cabin – 2011.
- e) **EB0028 - 0030 -** Assorted photos at TW – 2012.
- f) **EB0032 - 0038 -** Marquee build & assorted photos at TW – 2013.
- g) **EB0040 - 0052 -** Assorted photos at TW – 2014.
- h) **EB0053 -** Press coverage of TW showing marquee – Portsmouth Evening News – 2014.
- i) **EB0055 -** Build of concrete base for Victorian Gazebo – May 2015.
- j) **EB0056 - 0066 -** Assorted photos at TW – 2015.
- k) **EB0067 - 0080 -** Assorted photos at TW – 2016.
- l) **EB0081 - 0086 -** Assorted photos at TW – 2017.
- m) **EB0087 - 0093 -** Assorted photos at TW – 2018.

Documents (EB0877 - 0885)

- n) **EB0877 - 0878 -** Tournerbury Woods Estate boundary map (red line) & annotated site plan, cross-referenced to the applications listed at para.2 above.
- o) **EB0879 - 0885 -** Official Copies and Title Plan, and other copy title documents.

C. BACKGROUND

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[REDACTED] farmed Tournerbury Farm (TF) for most of his working life and in 1987 decided to sell to [REDACTED]

[REDACTED]

[REDACTED] From 1987 onwards I started to repair tracks in TW, engage in arboriculture management and actively manage TW, including assisting with the re-forestation after the 1987 October 'Great Storm'.

- 6 During my ownership of WC/TW a log cabin and adjoining deck, a Victorian style gazebo structure and a marquee structure have all been erected as set out more particularly below. All three of these structures have now been present at the Site continuously since their erection to date for periods in excess of 4 years.

E. LOG CABIN & ADJOINING DECK

- 7 The log cabin and deck is at point "2" on the plan at **EB0878**. The log cabin is 3.8M by 4.2 meters and the deck is 11.24 meters by 22 meters. The log cabin and deck are of timber construction.
- 8 The log cabin was originally purchased as a home office and erected in our London garden in January 2008. In April 2010 it was taken apart and moved to WC/TW. It was rebuilt at WC/TW in the autumn of 2010. Photos showing the erection and moving of the cabin appear at **EB0005 – 0006** and **0017-0019**.
- 9 The deck was then built round the log cabin during June/July 2011. The presence of the deck is shown at **EB0020 – EB0023**.
- 10 The above statements and exhibited photos demonstrate that these building works have been present as the Site since October 2010 to present and therefore for 9 years.

F. VICTORIAN GAZEBO

- 11 The Victorian gazebo is at point "3" on the plan at **EB0878**. The Gazebo is a small iron open structure consisting of 6 pillars, a filigree open roof and iron bench seating.
- 12 The Victorian gazebo was erected in May 2015 as shown at **EB0055** and is shown clearly in **EB0062**.
- 13 The presence of the Victorian Gazebo is shown in various photos at **EB0055 - EB0078** which demonstrate that these building works have been present as the Site since May 2015 to present and therefore for over 4 years.

G. MARQUEE

- 14 The marquee is at point "4" on the plan at **EB0878**. The marquee is a clear span aluminium and PVC marquee, 33 meters in length and 12 meters wide with a 3 meter x 3 meter entrance porch. It consists of a solid wooden marquee floor. It has two 'Chinese cocked hat' roof points as opposed to a straight line roof apex profile. Its highest points are just over 9 meters.
- 15 The marquee was purchased on 6th June 2013 and constructed at the Site in July 2013 and has had a continued presence at the Site from this time.
- 16 The presence of the marquee is shown in various photos at **EB0032 - EB0092** which demonstrate that these building works have been present at the Site since 30th July 2013 to present and therefore for 6 years.
- NB –** All photographic Evidence Base (**EB**) Meta data showing date and time of photo taken is available on request if required.

Dated this 6 day of September 2019

I believe the facts stated in this witness statement are true

