

**IN THE MATTER OF AN APPLICATION FOR CERTIFICATE OF LAWFULNESS UNDER SECTION
191 TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

**WITNESS STATEMENT OF
CHRISTOPHER SNELL**

I, **CHRISTOPHER SNELL**, of 198 Sea Front, Hayling Island, Hampshire, PO11 9HR **WILL SAY** as follows:

A. INTRODUCTION

1. I am the joint owner with my wife Alice Snell of The Tournerbury Woods Estate ("the **Estate**") which comprises 300 acres, which divide into four geographical areas:

- A: Woods Cottage and its environs.
- B: Tournerbury Wood (also known as Tournier Bury or Tournier Bury Wood or Tournerbury Woods or Tournier Bury Hill Fort).
- C: Tournerbury Plantation.
- D: Tournerbury foreshore and mud lands.

2. I have exhibited a map at **EB0878** showing the four areas and historical maps at **EB 0932 - 0935** evidencing the existence of these different areas. The Estate is situated off Tournerbury Lane, Hayling Island, PO11 9DL and is registered at HM Land Registry under title numbers SH14945 and HP584230. Copies of the Land Registry Official Copies and Title Plans are exhibited at **EB0879-0885**.

3. I make this witness statement in support of our application to Havant Borough Council ("the **Council**") pursuant to s.191 Town and Country Planning Act 1990 for a Certificate of Lawful Use or Development ("**CLEUDs**"). The application has four elements, although the evidence-base is common to all of them:

- Element 1, based on 10 years' user: change of use of Woods Cottage and its environs (as A above) into leisure / tourism use for the purposes of holiday lettings and camping and as a commercial event venue for the purposes of both holidays and the holding of weddings and events and the utilisation of any ancillary buildings and structures that may be required as necessary for such uses.
- Element 2, based on more than four years having elapsed since they were substantially completed: a log cabin ("**the Log Cabin**") and adjoining deck ("**the Deck**").

- Element 3, based on more than four years having elapsed since it was substantially completed: a Victorian-style gazebo structure ("**the Gazebo**").
- Element 4, based on more than four years having elapsed since it was substantially completed: a marquee ("**the Marquee**").

4. To assist the Council in considering this application:

4.1 Save where I have expressly indicated, the contents of this witness statement are within my direct knowledge.

4.2 In preparing the application, I have sought legal, not just planning, advice and assistance, as I understand that it is an evidential exercise against the correct statutory background, rather than a request to the Council to exercise its planning judgement.

4.3 I have produced as comprehensive a bundle of supporting documents, by way of the evidence base for the application, as I have been able to do, going back over 20 or more years. Please see section B below.

4.4 I have sought below to provide numbers to try to assist the Council. As to the basis of calculating those numbers, my approach has been (in the context of Element 1) to try to identify each and every activity at Woods Cottage which could be considered a distinct activity and relevant to the change of use, and the numbers of days on which those activities took place. I had not before taking advice appreciated that some of those activities were or might be of relevance in this context.

4.5 Also, that calculation is more complicated than it would first appear, not least as the activities range from Woods Cottage being a venue for a dinner party on an evening or simply for shelter for those shooting on a wet shoot day, to its use as a "holiday let" for accommodation, to its use as the base of operations for a 350-person wedding, including for overnight accommodation for the bride and groom. Is, for example, the use of Woods Cottage as the base for a 350-person wedding including for overnight accommodation one "event" or two?

B. DOCUMENTS

5. I have exhibited to this witness statement three lever-arch files of contemporaneous documents, comprising the Evidence Base to support this application for four CLEUDs. Their contents are subdivided as follows:

5.1 **Photographs (EB0001 – EB0093):**

- **EB0001 - 0003** **First Wedding at Woods Cottage – 18th May 2002.**

- **EB0004** First marquee owned by the Estate being erected at Woods Cottage- 2006.
- **EB0005 - 0006** Log cabin being erected at London home – 2008.
- **EB0007 - 0010** Woods Cottage gut and refurbishment – 2008.
- **EB0011 - 0012 -** Public marketing of the Estate for Corporate, Hospitality, Event / Party or holiday use RIBEX 2008.
- **EB0013** Corporate helicopter landing at Woods Cottage – 2008.
- **EB0014 - 0016** Marquee at Woods Cottage for corporate Christmas & shooting parties – 2008/2010.
- **EB0017** Taking apart log cabin from London home – 2010.
- **EB0018 - 0019** Re-build of above-mentioned log cabin at Woods Cottage – 2010.
- **EB0020 - 0023** Build of deck adjoining log cabin – 2011.
- **EB0024 - 0025** Winter commercial shoot parties at Woods Cottage – 2011.
- **EB0026 - 0027** Press coverage of Woods Cottage – Sunday Times Article - 2012.
- **EB0028 – 0030** Assorted event photos at Woods Cottage – 2012.
- **EB0031** Public marketing of Woods Cottage as a wedding venue at the National Wedding Fair, Olympia, London – 2013.
- **EB0032 - 0038** New marquee build & assorted event photos at Woods Cottage - 2013.
- **EB0039** Public marketing of Woods Cottage as a wedding venue at The Gay Wedding Fair, Brighton – 2013.

- **EB0040 - 0052** **Assorted event photos at Woods Cottage – 2014.**
- **EB0053** **Press coverage of Woods Cottage for parties and events - Portsmouth Evening News – 2014.**
- **EB0054** **Press coverage of Woods Cottage for holidays, weddings and events – Sunday Express - 2015.**
- **EB0055** **Build of concrete base for Victorian Gazebo – May 2015.**
- **EB0056 - 0066** **Assorted event photos at Woods Cottage – 2015.**
- **EB0067 - 0080** **Assorted event photos at Woods Cottage – 2016.**
- **EB0081 - 0086** **Assorted event photos at Woods Cottage – 2017.**
- **EB0087 - 0093** **Assorted event photos at Woods Cottage – 2018.**

5.2 Documents (EB0094 - 0931)

- **EB0094 - 0095** **Evidence of accessibility and openness of commercial activity at Woods Cottage since 1998 from local residents in their objections to planning application APP/18/00943.**
- **EB0096 - 0117** **Commercial Holiday Cottage Insurance documents 1998 / 1999 / 2000 / 2001 / 2002 / 2003 / 2004 / 2005 / 2006 / 2007 / 2008 / 2009 / 2010 / 2011 / 2012 / 2013 / 2014 / 2015 / 2016 / 2017 / 2018 / 2019. (22 years continuous).**
- **EB0118 - 0121** **Purchase receipts & invoices for domain names 'tournerbury.co.uk' & 'tournerbury.com' on 29/11/2004 for publicly marketing Woods Cottage on the internet. Purchase receipts & invoices for domain names 'woodsweddings.co.uk' & 'woodsweddings.com' on 20/02/2006 for publicly marketing Woods Cottage on the internet.**

- **EB0122 - 0125** **Email correspondence with an early customer of Woods Cottage showing commercial holiday letting in 2000 / 2001 & 2002.**
- **EB0126 - 0127** **Letter from Lloyds bank (10/03/1998) showing set up of bank account "Woods Account" specifically for commercial running of Woods Cottage & cheque book stub for same account showing a payment on 04/02/2000.**
- **EB0128** **Early marketing letter to a filming location company offering the Estate for film location work on 04/04/1996.**
- **EB0129** **Public marketing of Woods Cottage – email confirmation of joining the world's largest holiday home internet marketing platform 'Owners Direct' on 07/11/2008.**
- **EB0130 - 0131** **Public marketing of Woods Cottage – email confirmation of joining the holiday home internet marketing platform 'BabyFriendlyBoltholes' on 20/03/2009.**
- **EB0132 - 0135** **Public marketing of Woods Cottage – email exchanges and confirmation of joining the holiday home internet marketing platform 'Premier Cottages' on 24/11/2010 & 08/07/2011.**
- **EB0136 - 0137** **Public marketing of Woods Cottage – email and booking from St. Mary's Church, Hayling Island, Wedding Fayre on 19/02/2011.**
- **EB0138** **Public marketing of Woods Cottage – email regarding marketing on the internet marketing platform 'Wedding Venues.com' on 20/11/2012.**
- **EB0139** **Public marketing of Woods Cottage – email regarding renewing (second year) marketing on the internet marketing platform 'Hitched.com' on 12/11/2013.**

- **EB0140** **Tournerbury Holdings Ltd incorporated on 15/09/2005 to formally oversee growing corporate hospitality operations at Woods Cottage.**

- **EB0141** **Monkey Puzzle Ribs Ltd incorporated on 05/01/2006 to formally oversee the marine (boating) side of the corporate hospitality business at Woods Cottage.**

- **EB0142-0197** **Tournerbury Holdings Ltd booking calendar for holidays and events from 1st January 2009 to 31st December 2019 (11 years continuous).**

- **EB0198 - 0876** **Various Tournerbury Holding Ltd invoices predominantly covering 2008 to 2019 (12 years continuous).**

- **EB0877 - 0878** **Tournerbury Woods Estate boundary map (red line) & annotated site plan, cross-referenced to the application listed at para.1 above.**

- **EB0879 - 0885** **Official Copies and Title Plan, and other copy title documents.**

- **EB0890 - 0894** **Assorted emails with Natural England confirming meetings at the Estate.**

- **EB 0895 - 0913** **Assorted photographs from 1998 refurbishment of Woods Cottage.**

- **EB 0914 - 0929** **Assorted bank statements from 2009 to 2019 showing active trading of Tournerbury Holdings Ltd.**

- **EB0930 – 0931** **Original 1990 flyer for our first party & original 1996 flyer for one of our many parties between 1990 and 1998.**

- **EB0932 – 0935** **Historic maps detailing Tourner Bury (Tourner Bury Wood), Tournerbury Plantation, Brick works.**

C. BACKGROUND, USE OF WOODS COTTAGE AND TIMELINE

1987

6. My father, the late Francis Snell, farmed Tournembury Farm ("the **Farm**") for most of his working life and in 1987 decided to sell the whole farm and estate due to serious ill health. My father asked me if I would like to keep any parts of the estate and I asked him not to sell Woods Cottage and the area around it, Tournembury Wood, Tournembury Plantation and the adjoining mudflats. I promised my father that I would look after them. The Farm was sold in November 1987 to AG Phillips and Sons Ltd, a developer / building company. When the Farm was sold, my father also sold all farm machinery and equipment. I realised that having taken on the responsibility of looking after a substantial area of land and a house in poor repair, coupled with my parents lack of interest due to their focus on my father's ill health and recovery, that I would need to make the Estate pay for itself in order to sustain its management, habitat, sea wall defences and arboriculture.

7. Woods Cottage is located at point "1" on the plan at **EB0878**. It is a brick and flint tile detached house consisting of four bedrooms, kitchen and dining room, two sitting rooms, utility room, entrance/ boot room, bathroom, upstairs toilet and shower, balcony and garage. It was constructed in the late 1800s and is believed to have been built as the house of the foreman of Tournembury brick works as, in the late 1800s and through to my grandfather's ownership of the Estate in the early 1930s, Woods Cottage and its environs was a commercial brickworks site: see the historic maps exhibited at **EB0932 - 0935**).

8. I have used the word "environs" in this witness statement as synonymous with the "curtilage" of Woods Cottage, as shown shaded within the red line of our boundary on the plan at **EB0878**. To assist in understanding the nature and extent:

8.1 The Estate comprises four distinct areas: see para.1 above. The environs or curtilage of Woods Cottage are distinct from Tournembury Wood, Tournembury Plantation and the mudflats. The environs/curtilage of Woods Cottage comprise large lawns and rougher grass areas both stretching in all directions from Woods Cottage. It is important to note that Woods Cottage is not surrounded by the lawns with the rougher grass areas beyond the lawns, as you might get with traditional parkland: both types surround the Cottage itself. The tree cover and ground flora is much thinner and more akin to a domestic garden in the curtilage/environs of Woods Cottage than it is in Tournembury Wood and Tournembury Plantation.

8.2 The curtilage is demarked by the edge of Chichester Harbour itself to the south; boundary fences and hedges with the neighbouring title to the east and north; Tournembury Wood to the north-west; and the more densely planted Tournembury Plantation broadly to the west. Those are more or less clear delineations on the ground, but there are no fences, hedges or walls intersecting and dividing the curtilage of Woods Cottage itself.

8.3 My family and I have viewed and used the environs/curtilage as I have described it above and as shown shaded on the plan at **EB0878** as our "garden" or, as I saw it as a teenager and as our children have seen it, area to play in as an adjunct to Woods Cottage. Although Woods Cottage is a relatively small house (it only has four bedrooms), it does not, in its landscape context, have a small "garden" or curtilage. To put it another way, the curtilage and, indeed, the wider Tournembury Woods Estate, could accommodate a much larger house at its heart without being overshadowed by that house.

8.4 In terms of buildings, the area in question is centred on Woods Cottage. There is a garage ancillary to it; likewise, the Decking, Log Cabin and Marquee are ancillary to it, and an outbuilding.

1990-1991

9. Our long-term tenants of Woods Cottage moved to Devon and I took over the use of Woods Cottage. Having left school in July 1990, I used Woods Cottage as a weekend and holiday home, bringing friends back for weekend stays and numerous parties. Some of these parties were private residential parties and others were organised on a commercial basis. I held my first party in August 1990 on the Estate. This was a school leavers' party for our school year group. Throughout the 1990s I held a number of parties every year at Woods Cottage. Examples of flyers for two of these events dated from 1990 and 1996 are exhibited at **EB0930-0931**.

1998

10. Woods Cottage was fully refurbished so that it could be used more extensively by my family and me (privately) and let commercially for holidays, camping, parties and events. Photographs of these refurbishments are exhibited at **EB0895-0913**. (Please note that no photographic date and time metadata is available for these photographs as they were taken on film roll.) Woods Cottage was let commercially from the conclusion of these refurbishments (September 1998) and camping in the environs of Woods Cottage also began at this time. I have kept few records from this time, but see the email exchanges exhibited at **EB0122-0125** from September 2001 and June 2002 with a Mr Steven Leigh who rented Woods Cottage in 2000 / 2001 and 2002 and used the environs of Woods Cottage for camping.

11. I also took out specific holiday cottage insurance cover at this time beginning in September 1998 and this has been maintained continuously to date, to provide cover for holiday lettings at Woods Cottage all year round: i.e. for 365 days per year. The relevant insurance documents are exhibited at **EB0096-0117**.

2000

12. My wife Alice and I decided in 2000 that the next logical step to expand our business from camping and holiday lets was to turn the whole site into a year-round venue destination for a range of uses where people come together. I, therefore, began to market it as such, initially by word of mouth.

The first corporate hospitality event took place at Woods Cottage in December 2000 for a London based recruitment business (Heyman Woodworth Ltd). Following this event, hospitality uses increased and were predominantly focussed on corporate hospitality. From this point Woods Cottage and its environs were made available throughout the year for private events and corporate hospitality and the Woods Cottage holiday lettings and camping also continued throughout the year.

2002

13. The first wedding took place at Woods Cottage in 2002: my wife Alice's and my wedding. 180 guests attended: photographs are exhibited at **EB0001-0003**.

2003

14. The first wedding took place at the Estate on a commercial/paying basis. This was the marriage of Mr Brett Jeffery & Mrs Lesley Jeffery on Saturday 17 May 2003.

2005

15. Tournembury Holdings Ltd was formed as a legal entity through which to run the expanding holiday and event operation at Woods Cottage. I was the sole Director. A screenshot from the relevant Companies House web page is exhibited at **EB0140**. Tournembury Holdings Ltd was set up to run the commercial operations of the Tournembury Woods Estate.

2006

16. Tournembury Holdings Limited purchased its first marquee for use for hospitality events at Woods Cottage. I have exhibited photographs of the marquee being erected at **EB0004** and photographs of it being used for corporate Christmas and shooting parties at **EB0014-0016**.

2007

17. I launched 'Club Monkey Puzzle' corporate hospitality through Monkey Puzzle Ribs Limited, offering use of Woods Cottage for client entertaining, off-site staff meetings and corporate hospitality events including boating and other sporting activities in a pre-paid package. I was the sole Director and Monkey Puzzle Ribs Ltd was owned by Tournembury Holdings Ltd. A screenshot from the relevant Companies House web page is exhibited at **EB0141**. Marketing material and invoices are exhibited at **EB0886 - 0891**.

2008

18. Woods Cottage was totally gutted and refurbished to a very high standard before its letting as a commercial holiday cottage continued. Photographs of the refurbishment (before and after) are exhibited at **EB0007-0010**. Photographs of the marquee in use for a corporate Christmas event in December 2008 are exhibited at **EB0014-0015**.

2009

19. Over the course of the year Woods Cottage was commercially let for 157 days with 55 events. A copy of the bookings calendar for this year is exhibited at **EB0142-0146**.

2010

20. A new larger marquee was purchased. Over the course of the year Woods Cottage was commercially let for 174 days with 40 events. A copy of the bookings calendar for this year is exhibited at **EB0147-0151** and photographs of the marquee used for a shooting event in January 2010 are exhibited at **EB0016**.

2011

21. In 2011, my wife Alice and I decided to focus business on the Estate towards wedding events to pick up weekend business and complement the existing successful corporate hospitality business centred on Woods Cottage. Over the course of the year Woods Cottage was commercially let for 179 days with 50 events. A copy of the bookings calendar for this year is exhibited at **EB0152-0156** and photographs of a commercial shoot party from December 2011 are exhibited at **EB0024-0025**. In June/July 2011, the decking adjoining the log cabin was installed, as shown in the photographs exhibited at **EB0020-0023**.

2012

22. Over the course of the year Woods Cottage was commercially let for 195 days with 49 events. A copy of the bookings calendar for this year is exhibited at **EB0157-0161** and assorted event photographs are exhibited at **EB0028-0030**.

2013

23. The current Marquee was purchased and erected as marked on the plan at point 4, on **EB0878**. **This location is where the marquee still stands today.** Over the course of the year Woods Cottage was commercially let for 234 days with 51 events. A copy of the bookings calendar for this year is exhibited at **EB0162-0165** and assorted event photographs are exhibited at **EB0032-0038**.

2014

24. Over the course of the year Woods Cottage was commercially let for 186 days with 51 events. A copy of the bookings calendar for this year is exhibited at **EB0166-0169** and assorted event photographs are exhibited at **EB0040-0052**.

2015

25. Over the course of the year Woods Cottage was commercially let for 203 days with 53 events. A copy of the bookings calendar for this year is exhibited at **EB0170-0173** and assorted event photographs are exhibited at **EB0056-0066**.

2016

26. Over the course of the year Woods Cottage was commercially let for 183 days with 77 events. A copy of the bookings calendar for this year is exhibited at **EB0174-0177** and assorted event photographs are exhibited at **EB0067-0080**.

2017

27. Over the course of the year Woods Cottage was commercially let for 112 days with 73 events. A copy of the bookings calendar for this year is exhibited at **EB0179-0184** and assorted event photographs are exhibited at **EB0081-0086**.

2018

28. Over the course of the year Woods Cottage was commercially let for 108 days with 92 events. A copy of the bookings calendar for this year is exhibited at **EB0185-0190** and assorted event photos are exhibited at **EB0087-0093**.

2019

29. As at today's date, Woods Cottage has been commercially let for 73 days with 64 events. A copy of the bookings calendar for this year appears at **EB0185-0190** which demonstrates both the events which have taken place so far and those currently booked for the remainder of the year.

30. Exhibit pages **EB0198-0876** comprise various invoices issued by Tournerbury Holdings Ltd during the period 2008 - 2019 (12 years continuous) in respect of the commercial activities taking place at Woods Cottage including the holiday letting of Woods Cottage, camping use, hospitality, corporate, shooting and entertainment events, and wedding event hire.

31. By way of a summary, Woods Cottage and its environs have been used for all of the following activities since 1998:

- Corporate hospitality / client entertaining.
- Corporate staff away days and management meetings.
- Corporate Christmas parties.
- Birthday parties.
- Wedding anniversary parties.
- Christening parties.
- Wakes.
- Weddings.
- Retirement celebrations.
- Commercially let shooting parties.
- Charity fund raising balls.
- Charity fund raising picnics and activity days.

- Political social events.
- Social club BBQs.
- Charity fund raising dinners.
- Forest school and outward-bound activity centre.
- Scouts camping.
- Holiday lettings.
- Holiday camping.
- Family parties.

32. The occurrence of the above-mentioned uses has taken place at a frequency above and beyond that allowed by permitted development rights during the entirety of the 22-year period of use.

33. All photographic Evidence Base (Meta data showing the date and time of photos taken is available on request if required. The only **Evidence Base** photographs that do not hold this data are those showing the original 1998 refurbishment of Woods Cottage (**EB0895 - EB0913**) as these were taken on camera film roll and photocopied for the purpose of this statement. These original photographs are available if required.

D. OPENNESS OF USE

34. The commercial activities at Woods Cottage have always been carried out with openness and a substantial amount of information about them has been accessible to the public: without such openness, there would have been no commercial activities. I have set out salient examples of the degree of openness immediately below on a chronological basis.

2004

35. The domains Tournurbury.co.uk and Tournurbury.com were purchased in order to market Woods Cottage and Tournurbury Woods online (29 November 2004) as shown at **EB0118 – 0121**.

2005 to present

36. Tournurbury Holdings Ltd was formed as an operating company **EB0140**. Its ownership and directors have been a matter of public record.

2006 and following

37. Monkey Puzzle Ribs Ltd was formed as an operating company **EB0141**. Again, its shareholding and directors have been a matter of public record.

38. Woodsweddings.co.uk and woodsweddings.com were purchased to direct wedding traffic to the Tournurbury website (20 February 2006) as shown by **EB0118 – 0121**.

39. The first "Tournerbury-owned" marquee was erected on Woods Cottage West lawn, in clear view of Chichester Harbour water users and local residents on the other side of Mengham Rythe as shown in **EB0004**.

2008

40. The 'Club Monkey Puzzle' concept was marketed at "RIBEX 2008": an exhibition for powerboats and rigid inflatable boats ("RIB"), organised by Powerboat and Rib Magazine. The exhibition in 2008 was held at Cowes Yacht Haven Marina in the Isle of Wight and, I believe, attracted c.10,000 visitors. This was public marketing of Woods Cottage as a corporate hospitality venue (11 May 2008) as shown in **EB0011 – 0012**.

41. We joined the world's largest holiday home listing website 'Owners direct' on 7 November 2008 to market Woods Cottage: please see the copy email at **EB0129**.

2009

42. We joined the holiday listing website 'Babyfriendlyboltholes.com' on 20 March 2009 to market Woods Cottage. Please see the copy emails at **EB0130-131**.

2011

43. We joined the holiday listing website 'Premier Cottages' on 8 July 2011 to market Woods Cottage, as demonstrated by the emails at **EB0132-135**.

44. We advertised Woods Cottage as a wedding venue locally by attending and exhibiting at St Mary's Church Wedding Fayre on Hayling Island as demonstrated by the emails and booking form at **EB0136 – 0137**.

2012

45. We joined 'hitched.co.uk' (the UK's largest wedding venue listing website) to list Woods Cottage as a wedding venue, as demonstrated by the email at **EB0139**.

46. The Sunday Times included Woods Cottage in their "*100 Best holidays in the world this year*" on 29 January 2012 as shown in **EB0026 – 0027**. I believe that its national circulation was then 939,000.

2013

47. We exhibited Woods Cottage as a wedding venue at 'The National Wedding Show' at Olympia, Central London as shown in **EB0031** and at 'The Gay Wedding Show' in Brighton for the LGBTQ community as shown in **EB0039**.

2014

48. We hosted the wedding of the son of Jackie Branson, a member of Chichester Harbour Conservancy and a long-standing Havant Borough Councillor in July 2014 as can be seen on the bookings calendar at **EB0167**.

2015

49. On 8 February 2015, the Sunday Express published a nearly full-page article on Woods Cottage as a place to stay or get married: see **EB0054**. I believe that its then national circulation was 397,000.

50. We hosted a 'Thank you' lunch for Havant Conservative Association for Havant's new Member of Parliament on 28 June 2015 to thank Councillors and workers and volunteers who contributed towards the General Election campaign. The event was attended by a large number of sitting Councillors of both the Council and Hampshire County Council as can be seen on the bookings calendar at **EB0171**.

2004-2018

51. Natural England has carried out site visits for unit condition surveys (all of which were "favourable – no identified threats"), for discussions about the SSSI and the proposed coastal path, and for habitat checks. Representatives of Natural England or its predecessor came to Tournbury on all of the following dates:

- 26 April 2004.
- 9 July 2010.
- 10 November 2012.
- 26 July 2013.
- 17 December 2013.
- 18 March 2014.
- 1 June 2014.
- 29 April 2015.
- 19 May 2016.
- 16 June 2016.
- 13 December 2018.

51. I have exhibited at **EB0890 – 0894** such copy email correspondence as I have been able readily to identify, confirming some of the dates above.

2017

52. We held another 'Thank you' lunch for Havant Conservative Association hosted by Havant Borough's MP, Alan Mak, on 6 August 2017 to thank Councillors and workers and volunteers who contributed towards the General Election campaign. Again, the event was attended by a considerable

number of sitting Councillors of both the Council and Hampshire County Council, as can be seen on the bookings calendar at **EB0182**.

2019

53. Comments were made in response to our planning application APP/18/00943 by way of objection to Woods Cottage being used for leisure and tourism and wedding / event venue purposes. Those comments demonstrate that members of the public have been aware of the commercial event business at Woods Cottage for over two decades – albeit that they had not previously made objections to such use to the Council. Extracts from these comments appear at **EB0094 – 0095**.

E. LOG CABIN & ADJOINING DECK

54. The Log Cabin and Deck are at point "2" on the plan at **EB0878**. The Log Cabin is 3.8 metres by 4.2 metres and the central part of the decking around it ("the Deck" for the purposes of this application) is 6.5 metres by 14 metres. The Log Cabin and Deck are of timber construction.

55. The Log Cabin was originally purchased as a home office and erected in the garden of our then home in London in January 2008. In April 2010 it was taken apart and moved to Woods Cottage. It was rebuilt at Woods Cottage in the autumn of 2010. Photographs showing the erection and moving of the cabin are exhibited at **EB0005 – 0006** and **EB0017-0019**. It was under construction at Tournurbury by mid-October 2010 and completed by 2 December 2010.

56. Decking measuring 6.5 metres by 14 metres was then built round the log cabin during June/July 2011: ie, the Deck. The presence of the Deck is shown in the photographs at **EB0020 – EB0023**. It was under construction by 11 June 2011 and completed by 22 July 2011.

57. For clarity's sake, an extension was made to the Deck in 2017 which extended the decking to a total of 11.24 metres by 22 metres. Although the area of land beneath the extended area of decking is the subject of the application for Certificate 1 (i.e. on the basis of change of use), the extension is not the subject of the application for Certificate 2.

F. VICTORIAN-STYLE GAZEBO

58. The Gazebo is at point "3" on the plan at **EB0878**. The Gazebo is a small iron open structure consisting of six pillars, a filigree open roof and iron bench seating. It was erected in May 2015 as shown at **EB0055** and is shown clearly in **EB0062**.

59. The Gazebo is shown in various photos at **EB0055 - EB0078** which demonstrate its presence since May 2015 to present and, therefore, for over four years.

G. MARQUEE

60. The Marquee is at point "4" on the plan at **EB0878**. The Marquee is a clear span aluminium and PVC marquee, 33 metres in length and 12 metres wide with a 3 metre x 3 metre entrance porch.

It consists of a solid wooden floor. It has two 'Chinese cocked hat' roof pots as opposed to a straight line roof apex profile. Its highest points are just over 9 metres.

61. The Marquee was purchased on 6 June 2013. Its construction at point "4" was completed in July 2013 on a gravel base.

62. At the end of November 2015, the marquee was taken down for deep-cleaning and re-erected in the same position at the end of March 2016, but also so that more gravel could be added to the gravel base on which it sits, so as to stop moisture coming up through the floor boards if there was heavy rain. It is not possible to achieve that standard of cleaning of a marquee whilst the structure is intact and so we arranged for the cleaning to take place during the low season: that is the nature of the structure.

63. The presence of the Marquee since July 2013 is shown in various photos exhibited at EB0032 – EB0092.

Dated this 9th day of December 2019

I believe the facts stated in this witness statement are true


CHRISTOPHER SNELL