Evidence to support certificate of lawfulness application for flat at 20 Sea Front Hayling Island PO11 9HL

The evidence to support this application is provided in two forms

The first are the attached statutory declarations witnessed by a solicitor and made by the following people

- [redacted]

These documents show the change of use from the area being used as staff rest sleep and washing areas to becoming a residential flat and also show the time in summer 2013 the Turner family moved into the flat as their family home.

The second form of evidence is provided by family photos of the families children growing up in the flat

Firstly, Mr Turners son and nephews just as the flat was being finished ages 9 , 6 and 3 and now at 21,18 and 15

[redacted]

[redacted]

The second photo set is Mr Turners son age 1-3 in the flat followed by him age 14, where possible we have taken the photos in the same locations around the flat

We believe these pieces of evidence clearly show the flat has been the family home since the summer of 2013.

STATUTORY DECLARATION

I, [redacted] Hayling Island, Hampshire, PO11 9FP, do solemnly and sincerely declare as follows:

1. I was a personal trainer and worked on Hayling Island for a number of years.

2. I have known Carolynn Turner for many years. Through this connection, I became familiar with Henry Turner and his family and their homes at 18–22 Seafront, Hayling Island, Hampshire, PO11 9HL.

3. In the course of my work, I attended Flat 2 at 18–22 Seafront to assist [redacted] Mrs Turner. From approx 2013 I also attended the rear flat at the same premises on multiple occasions.

4. I attended the rear flat to assist Lee Turner following the birth of her children. I was present in the flat during periods when the children were babies and in the years that followed.

5. During my visits, I observed the rear accommodation being used as a residential dwelling. It was laid out and occupied as a family home and was being lived in on a day-to-day basis.

6. My attendance at the rear flat was in a professional capacity and involved entering and working within the living accommodation while it was occupied as a home by the family.

7. My knowledge of the use of the rear flat as a residential dwelling is based on my own direct visits and personal experience.

8. I make this declaration from my own knowledge and recollection, and I believe the facts stated in this declaration to be true.

I understand that this declaration is made for the purposes of supporting an application for a Certificate of Lawfulness of Existing Use relating to the rear flat at 18–22 Seafront, Hayling Island, and I am aware that it is of the same legal effect as if made under oath.

I make this solemn declaration conscientiously, believing the same to be true and by virtue of the provisions of the

Statutory Declarations Act 1835.

SIGNED and DECLARED by }

[redacted] }

}

Hayling Island in Hampshire }

this 2nd day of February 2026 }

Before me

[redacted]

MICHAEL ALEXANDER WILSON
SOLICITOR

A Solicitor/Commissioner for Oaths

Wilson Wakefield Solicitors
5 Sea Grove Avenue
Hayling Island
Hampshire
PO11 9EU

STATUTORY DECLARATION

I, [redacted] Hayling Island, Hampshire PO11 9DH, do solemnly and sincerely declare as follows:

1. I have known the Turner family for many years, both personally and professionally. I grew up on Hayling Island and visited the Turner family's amusement arcade premises at 18–22 Seafront, Hayling Island, Hampshire, PO11 9HL regularly from a young age.

2. My father was a local builder on Hayling Island, responsible for constructing a number of properties on the island. I later became a builder myself and began carrying out work for [Mr Turner / the Turner family] from around [circa 1989–1990] onwards.

3. Through my work and friendship with the family, I became very familiar with the building at 18–22 Seafront, including the rear accommodation now known as the flat. I have worked on the property both internally and externally over many years, including roofing, drainage, plastering, and general building works.

4. I recall that the rear accommodation was in use as staff accommodation long before it was converted into the flat as it exists today. It contained a toilet, shower, sink and sleeping area, and was used regularly by staff.

5. I personally used the facilities in this accommodation, including the shower, and I also stayed overnight there on a number of occasions. I specifically recall [redacted] including after social visits to the neighbouring public house.

6. At one point, due to issues with a leaking patio above, I installed temporary internal drainage to manage water ingress, routing it internally until permanent repairs could be carried out. This work further confirms my detailed knowledge of the internal layout and use of the accommodation at that time.

7. The accommodation was treated as a functional living space, particularly given the nature of the premises as a late-opening amusement arcade adjacent to a busy seafront and public house. It was common for staff and friends to remain on site after closing.

8. When the rear accommodation was later converted and extended to form the flat, I carried out plastering works throughout. This conversion was completed around 2012, to the best of my recollection. But definitely not long after.

9. Due to my long-standing involvement with the property, both as a builder and as a friend of the family, I am very familiar with the history, layout and use of the building and its rear accommodation over several decades.

10. I make this declaration from my own knowledge and recollection, and I believe the facts stated in this declaration to be true.

I understand that this declaration is made for the purposes of supporting a planning and lawful use matter relating to the above property, and I am aware that it is of the same legal effect as if made under oath.

I make this solemn declaration conscientiously, believing the same to be true and by virtue of the provisions of the

Statutory Declarations Act 1835.

SIGNED and DECLARED by } [redacted]

[redacted] }

}

Hayling Island in Hampshire }

this 2nd day of February 2026 }

Before me

[redacted]

MICHAEL ALEXANDER WILSON
SOLICITOR

A Solicitor/Commissioner for Oaths

Wilson Wakefield Solicitors
5 Sea Grove Avenue
Hayling Island
Hampshire
PO11 9EU

STATUTORY DECLARATION

I, [redacted] Hayling Island, Hampshire PO11 0AG, do solemnly and sincerely declare as follows:

1. I have known the Turner family all my life. Our families have been close friends for generations, and my parents were good friends with Mr and Mrs Turner before we were born. We grew up on Hayling Island and have known one another since childhood.

2. My father and Mr Turner were in business together for a number of years, operating a hot dog and burger kiosk near the fairground on Hayling Island. Through this and our long-standing family connections, our families remained in regular contact over many years.

3. I have visited the Turner family in the various homes they have occupied on Hayling Island over the years and have maintained a close personal connection with the family throughout my life.

4. I am familiar with the premises at 18–22 Seafront, Hayling Island, Hampshire, PO11 9HL, including the rear accommodation now known as the flat. I have visited this accommodation on many occasions over a long period of time.

5. From my own knowledge, I am aware that the rear accommodation was originally used as staff accommodation. It contained toilet and washing facilities, which I personally used when visiting the premises, and which were regularly used by those working there.

6. I am aware that Henry Turner and Lee Turner were married and initially lived in a large American-style trailer located at the Turner family home at 186 Seafront, Hayling Island. I personally visited them at this location while they were living in the trailer. This was during the period from 2006 to 2008 I believe.

7. Following the sale of the family home, I am aware that the same trailer was moved to the yard at the rear of the amusement arcade at 18–22 Seafront. I personally visited the trailer at this location while Henry and Lee Turner were living there. This was during the period from 2008 to around 2012.

8. I am aware that Henry and Lee Turner then converted the rear accommodation into a self-contained residential flat. And then moved from trailer to flat. I visited the accommodation following this conversion and observed it being used as a family home.

9. I personally witnessed Henry and Lee Turner's children growing up in the converted flat over a period of years and observed the accommodation being used continuously as a residential dwelling since about 2012 after moving from trailer

10. My knowledge of the use and evolution of the rear accommodation is based on direct personal experience, lifelong family friendship, and regular visits, rather than on assumption or hearsay.

11. I make this declaration from my own knowledge and recollection, and I believe the facts stated in this declaration to be true.

I understand that this declaration is made for the purposes of supporting a planning and lawful use matter relating to the above property, and I am aware that it is of the same legal effect as if made under oath.

I make this solemn declaration conscientiously, believing the same to be true and by virtue of the provisions of the

Statutory Declarations Act 1835.

SIGNED and DECLARED by }

[redacted] }

[redacted] }

Hayling Island in Hampshire }

this 2nd day of February 2026 }

Before me

MICHAEL ALEXANDER WILSON
SOLICITOR

[redacted]

A Solicitor/Commissioner for Oaths

Wilson Wakefield Solicitors
5 Sea Grove Avenue
Hayling Island
Hampshire
PO11 9EU

STATUTORY DECLARATION

I, [redacted] of the rear flat at 18–22 Seafront, Hayling Island, Hampshire, PO11 9HL, do solemnly and sincerely declare as follows:

1. I am the occupier of the rear flat at 18–22 Seafront, Hayling Island, and this property has been my sole and main residence for many years.

2. I married Lee Turner in 2006. Following our marriage, we initially lived in a large American-style trailer located at the Turner family home at 186 Seafront, Hayling Island.

3. After the sale of the family home at 186 Seafront in 2008, the same trailer was moved into the yard at the rear of the amusement arcade at 18–22 Seafront, where my wife and I lived on a full-time basis.

4. We lived in the trailer at the rear of the arcade from 2008 until 2012, during which time it was our sole place of residence.

5. During this period, I began converting the rear accommodation at 18–22 Seafront into a self-contained residential flat. I personally carried out and oversaw the conversion works, with assistance from family members and trades people where required.

6. The conversion works were carried out in stages. Initially, a bedroom and bathroom were completed, which allowed us to move into the building. The trailer was later sold in 2012 in order to raise funds to complete the remainder of the flat, including the installation of the kitchen.

7. From 2012, the rear accommodation became and has remained a self-contained residential flat with the facilities of a dwelling, including kitchen, bathroom, sleeping and living space.

8. Since moving into the converted flat, it has been my sole and main residence. I have not had any other permanent home during this period.

9. My wife and I have two children, born in 2011 and 2016. Our children have lived with us in the rear flat since early childhood and have grown up there as their family home.

10. At no point since occupying the converted flat have we ceased living there. Any short stays elsewhere have been temporary only and did not amount to living at another address.

11. The amusement arcade business operating at the front of the premises closed in 2023. This closure related solely to the business and did not affect our continued residential occupation of the rear flat, which has remained occupied as a dwelling before and after that date.

12. I am aware that council tax arrangements were historically linked to another flat within the building. This administrative arrangement did not reflect our actual occupation, as the rear flat has always been our home and place of residence.

13. My use of the rear flat has been continuous, open, and without interruption, and it has been occupied as a dwelling throughout this period.

14. I make this declaration from my own knowledge and recollection, and I believe the facts stated in this declaration to be true.

I understand that this declaration is made for the purposes of supporting an application for a Certificate of Lawfulness of Existing Use relating to the rear flat at 18–22 Seafront, Hayling Island, and I am aware that it is of the same legal effect as if made under oath.

I make this solemn declaration conscientiously, believing the same to be true and by virtue of the provisions of the

Statutory Declarations Act 1835.

SIGNED and DECLARED by } [redacted]

[redacted] }

}

Hayling Island in Hampshire }

this 2nd day of February 2026 }

Before me [redacted]

MICHAEL ALEXANDER WILSON
SOLICITOR

A Solicitor/Commissioner for Oaths

Wilson Wakefield Solicitors
5 Sea Grove Avenue
Hayling Island
Hampshire
PO11 9EU

STATUTORY DECLARATION

I, [redacted] Hayling Island, Hampshire, PO11 9BT, do solemnly and sincerely declare as follows:

1. I have known Henry Turner and his family for many years through both personal and business connections on
Hayling Island.

2. My family owned the public house adjoining the Turner family's business premises at 18–22 Seafront, Hayling Island, Hampshire, PO11 9HL for a number of years. During that period, I was closely involved with the day-to-day running of the public house as landlord for many years until 2017.

3. During my time as landlord, I was in regular contact with Henry Turner and his family as neighbouring business owners. I frequently visited the amusement arcade and associated areas as part of normal day-to-day activity on the seafront.

4. Through these regular visits, I became familiar with the rear accommodation at 18–22 Seafront. I was aware that this area had long contained toilet and washing facilities and was used by those working at the premises.

5. I personally visited the rear accommodation on numerous occasions and was aware of its use, including periods when it was occupied for residential purposes.

6. I am aware that the rear accommodation was converted into a self-contained residential flat several years before I ceased being landlord of the public house in 2017. I observed the flat being used as a home by HenryTurner and his family following that conversion.

7. My knowledge of the use of the rear accommodation is based on my own direct experience and long-standing familiarity with the premises and the Turner family.

8. I make this declaration from my own knowledge and recollection, and I believe the facts stated in this declaration to be true.

I understand that this declaration is made for the purposes of supporting an application for a Certificate of Lawfulness of Existing Use relating to the rear flat at 18–22 Seafront, Hayling Island, and I am aware that it is of the same legal effect as if made under oath.

I make this solemn declaration conscientiously, believing the same to be true and by virtue of the provisions of the

Statutory Declarations Act 1835.

SIGNED and DECLARED by }

[redacted] }

[redacted] }

Hayling Island in Hampshire }

this 2nd day of February 2026 }

Before me

[redacted]

MICHAEL ALEXANDER WILSON
SOLICITOR

A Solicitor/Commissioner for Oaths

Wilson Wakefield Solicitors
5 Sea Grove Avenue
Hayling Island
Hampshire
PO11 9EU

STATUTORY DECLARATION

I, [redacted]Hayling Island, Hampshire, PO11 9FT, do solemnly and sincerely declare as follows:

1. I have known the Turner family for many years through living and working on Hayling Island. During the 1990s I lived on or near Bembridge Drive, close to the seafront and Eastoke Corner, and I was familiar with the Turner family's businesses at 18–22 Seafront, Hayling Island, Hampshire, PO11 9HL.

2. Throughout the 1990s I regularly visited the amusement arcade and surrounding premises and knew the Turner family well. My children were raised locally and were familiar with the seafront businesses, including the arcade.

3. In the early years of the new millennium, I became the tenant of the gift shop forming part of the premises at 18–22 Seafront. This shop was located directly adjacent to, and in front of, the rear accommodation now known as the flat.

4. During my tenancy of the gift shop, I was in regular contact with the Turner family and used the shared rear areas, including the yard and garage to the rear of the building, which was located close to the entrance to the flat.

5. I frequently accessed the rear yard through the roller shutter and spent time with Mrs Turner and other members of the family while the businesses were operating. The premises were very much a shared working environment between neighbouring businesses.

6. I am aware that the rear accommodation was in residential use during this period. I regularly observed family life associated with the flat, including Henry and William Turner growing up in the flat. I know their oldest child was a baby and he is now 14 years old, and their youngest was in the flat as a new born baby.

7. Through my time as a tenant of the gift shop and my close day-to-day contact with the Turner family, I became very familiar with the use of the rear accommodation as a residential dwelling and its integration into everyday family life.

8. I make this declaration from my own knowledge and recollection, and I believe the facts stated in this declaration to be true.

I understand that this declaration is made for the purposes of supporting a planning and lawful use matter relating

to the above property, and I am aware that it is of the same legal effect as if made under oath.

I make this solemn declaration conscientiously, believing the same to be true and by virtue of the provisions of the

Statutory Declarations Act 1835.

SIGNED and DECLARED by } [redacted]

[redacted] }

}

Hayling Island in Hampshire }

this 2nd day of February 2026 }

Before me

[redacted]

MICHAEL ALEXANDER WILSON
SOLICITOR

A Solicitor/Commissioner for Oaths

Wilson Wakefield Solicitors
5 Sea Grove Avenue
Hayling Island
Hampshire
PO11 9EU

STATUTORY DECLARATION

I, [redacted], do solemnly and sincerely declare as follows:

1. I am a qualified electrician and have worked on Hayling Island for many years. I first became involved with the Turner family's premises at 18–22 Seafront, Hayling Island, Hampshire, PO11 9HL in or around 1990, when Mr Turner took over the building.

2. At that time, I carried out a full rewire of the premises. This work covered the main commercial areas of the building as well as the rear areas.

3. Through carrying out this work, I became very familiar with the layout of the building, including the rear accommodation. At that time, the rear accommodation contained toilet and washing facilities and was used by staff and the owners in connection with the operation of the premises, including being used for rest and for sleeping on occasion.

4. [redacted] I had further involvement with the Turner family from time to time in a professional capacity. Any electrical work I carried out after this point was occasional rather than ongoing.

5. I am aware that the rear accommodation was later converted into a self-contained residential flat around 2012. I did not carry out a full rewire of the flat as part of this conversion.

6. I am aware that a small electrical repair associated with the flat wiring was carried out by my brother after the conversion, which took place in or around 2013. My knowledge of this is based on my familiarity with the building and discussions at the time.

7. My knowledge of the premises and the rear accommodation is based on direct professional involvement over a long period of time, rather than on assumption or hearsay.

8. I make this declaration from my own knowledge and recollection, and I believe the facts stated in this declaration to be true.

I understand that this declaration is made for the purposes of supporting an application for a Certificate of Lawfulness of Existing Use relating to the rear flat at 18–22 Seafront, Hayling Island, and I am aware that it is of the same legal effect as if made under oath.

I make this solemn declaration conscientiously, believing the same to be true and by virtue of the provisions of the

Statutory Declarations Act 1835.

SIGNED and DECLARED by }

[redacted] }

[redacted] }

Hayling Island in Hampshire }

this 2nd day of February 2026 }

Before me

[redacted]

A Solicitor/Commissioner for Oaths

MICHAEL ALEXANDER WILSON
SOLICITOR

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5 Sea Grove Avenue
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PO11 9EU