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**Fwd: I hope this is okay.**

1 message

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**Eric Cox** <ericcoxplanning@gmail.com>  
To: JLiebtrau@winchester.gov.uk  
Cc: HEATHER WOODS [REDACTED]

19 September 2019 at 09:54

Dear Mr. Liebtrau

Further to my earlier e mail today, I set out below my Client's response to the objections submitted by Mr. Stone and Mrs. Foster

PA No - 19/01683/LDC - The Greenhouse, Gravel Hill, Shirrell Heath, Hants SO32 2JG

Further to my email dated 28th August 2019, I have now had an opportunity to taking my Client's instructions on objections submitted by Mr. Stone and Ms. Foster.

I turn to Mr. Stone's objection.

Firstly, and fundamentally and I quote from his objection - " A caravan was brought onto the land in December 2010, owned by Heather Woods and her partner, Graham Snape and **THEY OCCUPIED IT FROM 1ST JANUARY 2011**" (NB.- my highlighting in capital letters).

That is correct and confirms the information contained in Mr. Snape's statutory declaration - please see paragraphs 1 and 9 of that document.

Under the heading in his objection entitled "Concealment", Mr. Stone accuses me of deception to a meeting I had with Mr. Rob Riding of WCC, then according to him I was acting as the agent for Ms. Woods.

Mr. Stone is correct that I had a meeting with Mr. Riding but what he has written in his objection is completely untrue.

The true facts are that the meeting took place on 3rd of August 2010 and I was representing Mr. Stone NOT Ms. Woods. Please note this meeting took place almost 5 months BEFORE Ms. Woods and Mr. Snape commenced occupation there.

I attach a serious of emails I had with Ms. Longley of WCC in March and April 2018 culminating in her providing me with a copy of Mr. Riding's file note of the meeting of 3rd August 2010. Please note that, at the time, I sent copies of these emails to Mr. Stone - his email address is JaneFoster45@hotmail.com. His partner is Ms. Foster. Therefore Mr. Stone was fully aware of the true facts.

Mr. Riding's note records he had attended a pre-arranged site meeting with me "to discuss alleged breaches of planning control". The file note records the use of an extension which was part of a wooden building within the curtilage of "Sunnybank" which was the subject of an enforcement appeal. At the time that building was occupied by Mr. Stone's daughter and her children - as it is today. No connection whatsoever with my client.

The second point related to the use of a mobile home which was also sited within the curtilage of "Sunnybank" and his note records its usage and states - " There was no evidence to suggest

it is being used as a separate unit of residential accommodation"

Mr. Stone states - " I understand he (ie Mr. Riding) met Mr. Cox acting as agent for Ms Woods. Mr. Cox told Mr. Riding the caravan was ancillary to the adjacent dwelling Sunnybank, and shared facilities within. (This will be in the Council records). That simply was not true"

I have produced the Council record provided to me by them. At that time I was not acting for Ms. Woods.

I was acting for Mr. Stone.

Mr. Stone is correct when he states " Ms Woods paid rent".

Yes - commencing 1st January 2011 - almost 5 months AFTER that meeting with Mr. Riding

Further in his objection he refers to "A couple of years on a PCN was issued relating to a further caravan sited within the greenhouse..." He then questions concealment again.

I have attached Ms. Longley's email to me dated 21st March 2018 where she refers to this under ref 16/00294/CARAVN in December 2016 and records – The case was closed".

I have referred to this in my reply to her dated 21st March 2018 as follows - Ms. Woods has advised me of the 2016 event you refer to "

I have now re-checked that with her and she clearly recalls the case officer was Gareth Ball and once he saw the caravan had been removed he advised her there was no need for her to complete and return the PCN. I'm sure the Council's records will confirm this.

Again, where is the "concealment" Mr. Stone refers to?

Later in his objection Mr. Stone refers to works taking place on 26th May 2018. That is totally consistent with Mr. Snape's statutory declaration - paragraph 16 refers.

Mr. Snape has stated in his statutory declaration that the original works took place in early 2013.

Mr. Stone states - " This work was not carried out in 2013 as stated"

With respect, what "evidence" is Mr. Stone putting forward to support this ?

He later adds that he challenges the competence of Clark's Caravan and Boat Haulage Ltd. and South Coast Body Repairs Ltd and adds -" I contest the opinion that new metal could not be welded in to make it sound enough to be moved".

Again with respect, that is his opinion not "evidence".

In any event , what grounds does he have to disagree with the expert views of the 2 professional companies ?

Great play has been made that both Mr. Snape and I admitted - and again, I quote Mr. Stone - "the caravan was moveable in 2016".

That is correct. I have already dealt with this in detail in my earlier comments in my Client's response dated 15th August to Ms Foster's objection. It is also explained in Mr. Snape's statutory declaration.

Why, in 2018, would my Client apply to retain the structure as a mobile home if she believed, since 2013, it was in fact a dwelling ?

I repeat it was only in response to a question in the PCN issued on 13th March 2019 that alerted both Mr. Snape and myself of the reality of the changed planning circumstances.

Various other points are made by Mr. Stone in his objection, These are not accepted by my Client, but in any event she believes are not material to the determination of her LDC application.

As a matter of courtesy I am copying this to both Mr. Stone and Ms Foster.

I very much hope, in the light of the contents of this e mail, they will withdraw their objections to this application.

Eric Cox ( on behalf of Heather Woods)

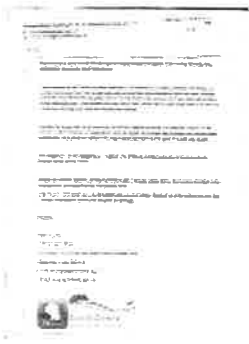
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**5 attachments**



**1.jpg**  
790K



**2.jpg**  
992K



**3.jpg**  
444K



**4.jpg**  
571K