

The Head of Planning Management
Winchester City Council
City Offices
Colebrook Street
Winchester
Hampshire
SO23 9LJ

13 July 2022

Dear Madam,

Application for Certificate of Lawful Use or Development.
Plot 12 'The Old Piggery', Firgrove Lane, North Boarhunt, Winchester, PO17 6JU.
Retention of building as a single dwellinghouse (Class C3).

We have been instructed by Joe Keet to invite your Council to issue a Certificate of Lawful Use or Development which recognises that, as the dwellinghouse that stands on Plot 12 at 'The Old Piggery' was completed in **February 2012** (ie over four years ago), has been continuously occupied in C3 residential use since **February 2017** (ie for over four years) and there is no pre-existing Enforcement Notice, it is now lawful.

The applicant, Joe Keet was invited to compile a short list of witnesses to the creation and use of Plot 12; each witness drafted their own Declaration and completed it before a Solicitor of their choice. The six completed Declarations are reproduced as attachments to this application but a summary of their consistent, robust and reliable evidence is presented here.

Joe Keet has declared that construction of the subject building commenced in November 2011, it was completed in February 2012 and his nephew Edward Henry Keet has resided in the building since February 2017. John Richards has confirmed that he worked on the subject building as a casual labourer with David Keet and Philip Jenkins and the converted building was completed in October 2014. David Keet worked as a carpenter on the subject building, alongside David Keet and Philip Jenkins, which was completed in October 2014. Philip Jenkins' confirmed that he worked with David Keet and John Richards on the subject building, that was completed in October 2014. Jane Mary Keet confirmed that she witnessed Joe Keet and Philip Jenkins constructing the subject building in November 2011 and recalls that it was substantially completed by February 2012. Edward Henry Keet has declared that he moved into the subject building on 12th February 2017 and continues to reside there today.



The subject building, viewed from the north.

It is submitted that the Declarations of these witnesses comprises robust and reliable evidence that the conversion works to Plot 12 at 'The Old Piggery' were substantially completed by October 2014 and that it has been continuously occupied as a dwellinghouse since February 2017. As over four years have passed and there is no pre-existing Enforcement Notice in place, the building on Plot 12 should be recognised as being a lawful dwellinghouse and a Certificate of Lawful Development should be issued to that effect. Please do not hesitate to contact our office, however, if there are any matters of concern.

Yours faithfully,



Niall Tutton
Director