

**Town and Country Planning Act 1990  
(As Amended)**

Planning Statement

Retention of Use of Outbuilding for Purposes  
Incidental to the Main Dwelling

Site: Little Blythe Farm, Leek Road,  
Weston Coyney, Staffordshire, ST3 5BD

Document date: July 2015

Applicant: Mr S Perkins

**Ref:** PER162/4

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### **Appendix 1 – Statutory Declaration by Mr. S. Perkins**

## 1. INTRODUCTION

- 1.1 This planning statement has been submitted by Knights on behalf of Mr. S. Perkins and Mr. A. Perkins to accompany a planning application to retain the use of an existing two storey outbuilding to provide accommodation that would be wholly incidental to the enjoyment of the occupants of the host dwelling, Little Blythe Farm. (Note: the use of the word 'accommodation' in this report does not strictly refer to residential accommodation as the outbuilding could be used to provide office or leisure accommodation).
- 1.2 The submission of this planning application follows pre-application engagement with Christopher Thorpe on 21 July 2015 (pre-application reference number PAD/2015/0050).
- 1.3 This planning application is supported by a statutory declaration from Steve Perkins (contained within Appendix 1) and indicative layout plans shown on Plan 4043-01-098 REV B.
- 1.4 A recent aerial photograph of the application site is shown below. The outbuilding in question is shown at the north of the site (orientated in this image to be shown on the left-hand side).



**Figure 1 - Current aerial photograph**

- 1.5 The outbuilding was constructed around 1975 following the receipt of planning permission SM 2967. It has been used for purposes incidental to the host dwelling since then, including for garaging, workshop, storage and as sleeping accommodation. In 1981 it was primarily used by the occupants of the host dwelling to run their office or their business (Perkins Plasterers), but the office depended up[on the host dwelling for bathroom/WC facilities. The outbuilding has always fallen in the curtilage of the host dwelling and shares access and parking areas.

- 1.6 Following the death of their father, Mr Leslie Perkins in 2013, Steve and Andrew Perkins carried out some refurbishment works and internal decoration at the outbuilding. They now proposes to sell Little Blythe Farm (main house and outbuilding). However, before doing so, and as discussed at the pre-application stage, they would like to regularise the use of the outbuilding through obtaining planning permission.
- 1.7 It is proposed that the outbuilding remains perpetually incidental to the host dwelling and planning conditions are suggested to prevent the outbuilding from being severed from the host dwelling and to control its use to one being incidental.

## **2. SITE AND SURROUNDINGS**

- 2.1 The existing dwelling at Little Blythe Farm comprises of a detached bungalow located centrally within the plot with a single vehicular access point positioned in the northeast corner accessing Leek Road. This outbuilding was erected in 1975 and replaced an earlier cottage in its place. There is also a large elongated single storey outbuilding at the rear of the property.
- 2.2 The outbuilding (the subject of this pre-application enquiry) is two-storey in height, of brick and tile construction and is positioned centrally along the front boundary of the site, readily visible from Leek Road. It has a ridged roof with a gable fronting Leek Road. The Local Planning Authority will be aware that planning permission was granted on 12 November 1976 which related to this building in respect of 'Alterations to existing building to form cattle shed, tractor shed, garage and store' (at Little Blythe, Leek Road, Weston Coyney).
- 2.3 The outbuilding is still being utilised as an office from where Perkins Plasters continue to run their plastering business from (continuing the business that was previously run by their father). The office use was begun as far back as 1981. Before this, the upper floors were utilised as bedroom accommodation for members of the family between 1976-1979. Therefore this building has in any event always been physically and functionally linked to the main house. The building sits within the curtilage of the main dwelling sharing the same access to Leek Road, and is readily accessible from the main property.
- 2.4 The space between this building and the main domestic bungalow provides the main driveway and parking area for the property's vehicles. The property is surrounded by a number of mature trees with a low level wall surrounding the domestic curtilage. The property also includes a field which extends to the east and south of the domestic curtilage and is bounded by mature hedgerow with sporadically sited trees positioned throughout the site.
- 2.5 In its wider context, the property is immediately surrounded by a number of other domestic properties and agricultural holdings, located in a semi-rural setting. To the west of the site is Roughcote Lane, which leads towards Caverswall Common in the southeast. The site is located within the Staffordshire Green Belt a short distance to the north of the settlement of Weston Coyney (which forms part of the wider Stoke-on-Trent conurbation), with the village of Hulme located to the north and the towns of Werrington and Cellarhead located beyond.

### **3. RELEVANT PLANNING HISTORY**

- 3.1 SM 2967 - Alterations to existing building to form cattle shed, tractor shed, garage and store - approved 12 November 1976.

This included a condition stating *“The use of the premises shall be confined to that described in this permission and shown on the submitted plan and shall not be extended to any other use within the meaning of the Town and Country Planning (Use Classes) Order 1972”*.

- 3.2 12/00990/FUL - Alterations and change of use of existing outbuilding to residential dwelling - Refused 7 December 2012. Appeal dismissed on (APP/B3438/A/13/2193210) 18 June 2013.

In reaching his decision, the Planning Inspector concluded that the proposed development did not function as a separate employment use.

#### **4. THE PROPOSAL**

- 4.1 The planning application seeks to obtain planning consent for this outbuilding to be used for domestic purposes wholly incidental for the enjoyments of occupants of the main dwellinghouse. No external alterations to the building are proposed.
- 4.2 The purpose of this planning application is to provide clarity on the lawful uses that this outbuilding can be used for in order to facilitate the sale of this property. In seeking planning approval for this scheme it is our view that this building could be used for a variety of uses provided that they are connected to the residential operations of the main dwelling. As such the accompanying layout plan sets out an indicative scheme (Plan ref: 4043-01-098 REV B) to demonstrate how this building might reasonably be used. The layout plan shows that the rooms could be utilised as; a home office, gymnasium, kitchen facilities, bedroom accommodation, living accommodation, bathroom and storage. However these uses do not set out an exhaustive list of uses as these rooms and the quantum, sub-divisions and location of these various uses within the outbuilding could be rearranged over time provided that they continued to form purposes wholly incidental to the main dwellinghouse, and controlled as such by condition.
- 4.3 The building exists and is lawful. Notwithstanding its substantial size, it must be put to some use and the previous Inspector concluded that it was not a 'free standing employment building'. Hence it make sense for its use to be perpetually controlled through a planning permission being as incidental to the host dwelling, which also provides certainty for future occupiers and the LPA.
- 4.4 This Planning Statement seeks to justify that this use is fully in accordance with the Council's planning policies and National Government guidance. The report also recommends suitable planning conditions that would ensure the proposed use would to be reasonably enforced moving forward.

## **5. THE DEVELOPMENT PLAN AND OTHER MATERIAL CONSIDERATIONS**

- 5.1 Section 38(6) of the 2004 Planning and Compulsory Purchase Act requires that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise. The most important material consideration at this stage is the National Planning Policy Framework (the Framework), which was published on 27 March 2012. This represents the most up to date Government planning policy and replaces all of the former Planning Policy Guidance notes (PPGs) and Statements (PPSs) of which are listed at Annexe 3 of the Framework.
- 5.2 At the time of writing, the development for Staffordshire Moorlands District Council comprises the Core Strategy which was adopted on 26 March 2014 as well as the Peak District National Park Core Strategy which was adopted in October 2011. The latter document relates to areas within the District Council which fall within the Peak District National Park boundaries and are therefore not relevant to the application site.
- 5.3 The Council are now in the process of reviewing their Core Strategy through the production of a new Local Plan which when adopted will guide new development during the period of 2016 to 2031. This plan incorporates work that had already been undertaken in the production of Site Allocations development plan document whose findings will now be included within the production of this new Local Plan. The draft version of the Local Plan is currently undergoing a public consultation between 6 July and 14 September 2015.

### **Core Strategy**

- 5.4 The Core Strategy was adopted in March 2014 and provides both the strategic management planning policies which will inform the determination of planning applications through to the year 2026.
- 5.5 The relevant policies to this application are as follows:
- Policy SS1 - Development Principles
  - Policy SS4 - Managing the Release of Housing Land
  - Policy E2 - Existing Employment Areas
  - Policy DC1 - Design Considerations
  - Policy R1 - Rural Diversification
  - Policy R2 - Rural Housing
  - Policy T1 - Development and Sustainable Transport



- 5.6 Policy SS1 sets out a number of policies which seek to positively deliver social, economic and environmental benefits to the District. This policy sets out a number of objectives, those relevant to this planning application are summarised below:
- Provide a mixture of types of housing to meet the needs and aspirations of existing and future communities.
  - Insist that new development maintains the distinctive character of the District's towns and villages.
  - Seeks new development to secure high quality and sustainable environments which make efficient and effective use of resources.
- 5.7 Policy SS4 seeks to restrict the levels of new housebuilding within the Green Belt through the careful phasing in the release of unidentified windfall sites so not to undermine the renaissance of the North Staffordshire conurbation.
- 5.8 Policy E2 supports the provision of employment premises (falling within use classes B1, B2 and B8) only supporting their redevelopment for housing, retail and other non-employment uses where they are either identified within the Site Allocations DPD (now to be brought forward through the emerging Local Plan), it can be demonstrated that employment use on the site is no longer viable or suitable, and that there are substantial planning benefits of the scheme which would outweigh the loss of employment use.
- 5.9 Policy DC1 requires all new development to be well designed in order the complement the special character of the area.
- 5.10 Policy R1 requires all new development outside settlement boundaries to be assessed to ensure that it enhances the character, appearance and biodiversity of the countryside, promote sustainable diversity of the rural economy, facilitate economic activity and meet the needs of the rural community. The policy goes on to say that *"wherever possible development should be within suitably located buildings which are appropriate for conversion"* and that *"priority will be given to the re-use of rural buildings for commercial enterprise, including tourism uses, where the location is sustainable and the proposed use does not harm the building's character and/or the character of its surroundings"*.
- 5.11 Policy R2 sets out a number of instances where new housing (aside from those otherwise specifically allocated) can be supported within rural areas. These instances include the provision of extensions to existing dwellings which are of an appropriate scale and design, and the conversion of non-residential rural buildings where the building is of suitable construction to facilitate its conversion and where it can be demonstrated that an agricultural or commercial use is neither viable or suitable.

- 5.12 Policy T1 requires all new development to be located where the highway network can satisfactorily accommodate the predicted traffic generation as well as provide sufficient on-site car parking.

### **Other Material Considerations**

#### The National Planning Policy Framework (The Framework)

- 5.13 The Framework supersedes all previous planning policy guidance notes and statements upon which the policies of the extant Local Plan are based. The Framework carries with it a presumption in favour of sustainable development which is defined as having a social, economic and environmental role.
- 5.14 The Framework at paragraph 14 states that for decision taking, development proposals that accord with the development plan should be approved without delay. Where the development plan is absent, silent, or relevant policies are out of date, permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or specific policies in the Framework indicate that development should be restricted.
- 5.15 Paragraph 9 of the Framework relates to achieving sustainable development and identifies the benefits of improving the conditions by which people live, work and travel.
- 5.16 Paragraph 28 seeks to support economic growth in rural areas and in doing so seeks to support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through the conversion of existing buildings and well-designed new buildings.
- 5.17 Paragraph 50 seeks to deliver a wide choice of high quality homes in order to widen opportunities for home ownership.
- 5.18 Section 9 of the Framework entitled 'Protecting Green Belt land' sets out a list of exceptions where the construction of new buildings are not considered to be inappropriate. These exceptions which are considered to be appropriate development include the extension and alteration to buildings which do not represent disproportionate additions over and above the size of the original, and the replacement of buildings provided that the replacement building is not materially larger than the one that it replaces.

## 6. ASSESSMENT

### Principle of Development

- 6.1 The application building was first granted planning permission in 1976 to provide a building to be used for storage in connection with both the main dwelling and the adjoining small holding. The building is sited within the domestic curtilage of the main dwelling, sharing the same site access and internal driveway and appears physically associated with the main dwelling on account of its absence of boundary treatment between the two properties.
- 6.2 An aerial photograph that was taken of the site shortly after the construction of the outbuilding ( the subject of this application) is shown below and demonstrates that the building that is currently in place comprises the original building:



**Figure 2 - Historic Aerial Photograph**

- 6.3 Appendix 1 contains a Statutory Declaration from Steve Perkins who has confirmed the nature of use of this building since its construction. The building has been utilised for a wide variety of uses since its construction, largely in connection with the applicant's father (now deceased) who lived at the application site and ran his plastering business from an office in the first floor of the outbuilding whilst using the ground floor to provide storage, and also domestic garaging. When the business was in operation, the office was used by the applicant's father and other family members as well as one additional administrative member of staff who did not reside at Little Blythe Farm. At the time, there was no bathroom within this building and therefore it was necessary to use the facilities within the main dwelling. Furthermore, with

regards to the storage contained within the building, the vast majority of materials (i.e. the bulkier items) were stored off-site at a separate premises.

- 6.4 In an effort to facilitate the sale of Little Blythe Farm, the interior of the building was refurbished in late 20014 / early 2015 and this included the installation of a bathroom as well as general aesthetics improvements to the shell of the building.
- 6.5 In light of the above, given the building's previous use in connection with employment, consideration needs to be taken to Core Strategy Policy E2 'Existing Employment Areas' requires the loss of employment uses to be fully justified, only supporting alternative uses if they are considered to be no longer viable or suitable. As set out elsewhere, the office use that has existing in this building since 1981 relates to Perkins Plasterers, who until recently have resided at the host dwelling, which is currently vacant. The alternative employment options for this site are therefore minimal given that any independent business proposals would evidently result in potential amenity issues to the residents of the main dwelling as well as potentially resulting in a significant increase in vehicular movements, potentially incorporating an increase in commercial vehicles arriving and departing from the site which may also result in adverse highway safety issues, especially given the shared access. Such levels of uncontrollable disturbance would not be considered appropriate given the outbuilding's close proximity to the main residence.
- 6.6 This view was also held by the Planning Inspector in reaching his decision (in dismissing the appeal of 12/00990/FUL) who formed the view that he was "*not persuaded that the site would be suitable for a free standing commercial unit*" and as a result considered that the change of use would not conflict with the policies that were designed to prevent the loss of employment sites. With this taken into account it is considered that there is no realistic possibility for this building to be utilised for an alternative business use and therefore the requirements of Policy E2 have been satisfied.
- 6.7 The previous refusal of planning application 12/00990/FUL (which was subsequently dismissed at appeal) established that the use of this building as an independent dwellinghouse was considered to represent an unsustainable development within the countryside which would in turn conflict with Green Belt policies. The Planning Inspector noted at the time that the building appeared to form a function that was ancillary to the residential use of the site or that the whole site operated as a mixed commercial and residential use.
- 6.8 This planning application proposes to utilise the building for purposes wholly incidental to the enjoyment of the residents of the main dwellinghouse and as a consequence would not result in a net increase in the number of dwellings within the application site. As a result this scheme would not represent an unsustainable development. The conversion of the building would also result in no material enlargement of the building or changes to its appearance, and as a consequence would adhere to Green Belt and rural policies which supports the conversion of rural

buildings provided that they are capable of conversion and do not result in a material enlargement or alteration of the building. Therefore the scheme is considered to be compliant with Core Strategy Policies SS4, R1 and R2.

- 6.9 It is therefore considered that the use of this building to provide uses wholly ancillary to the enjoyment of the residents at the main dwelling at Little Blythe Farm overcomes the objections in principle that were raised in the refusal of 12/00990/FUL (which sought to convert the building to provide an independent dwellinghouse) and the principle of development now adheres to the policies contained within the Core Strategy and the guidance within the Framework.

### **Design**

- 6.10 Policy DC1 of the Core Strategy requires new development to be of a high quality design in order to respect the character of the area. Furthermore, Policy R1 states that all efforts should be made to ensure that new development proposals are undertaken within suitably constructed rural buildings within the rural area. In this instance, the building is in place and has been since 1975 providing a variety of functions to serve the occupants of the main dwelling. The conversion to provide incidental accommodation requires no further external alterations to the building and as such would have a neutral impact on the character of the surrounding area. The scheme is therefore compliant with these policies and results in an efficient use in natural resources and existing brownfield land. The proposed development would therefore be in accordance with Policies SS1 and DC1 of the Core Strategy.

### **Transport**

- 6.11 The utilisation of this outbuilding to provide ancillary accommodation would not result in a net increase of vehicular movements as the number of households would remain the same. Furthermore, given the property's uses in connection with the family run business utilising the outbuilding to provide their offices (including one member of staff who did not reside within the main dwelling) as well as providing an element of storage for that business means that the new use would effectively result in a reduction of vehicular movements to and from the site.
- 6.12 The level of on-site car parking would not be required to be increased to incorporate this incidental use. Furthermore, the site contains adequate hardstanding and manoeuvring space within the plot to incorporate sufficient car parking and as a result would not result in undue pressure for private vehicles to be parked on the public highway.
- 6.13 The proposal is therefore considered to adhere to Policy T1 of the Core Strategy.

## Ecology

- 6.14 The outbuilding has been in continued use since its erection in 1976 and subject to various refurbishments over the course of time. The change of use to provide ancillary residential accommodation would not facilitate the material alteration of the external or internal elements of the building. As a consequence, it is considered that no bat survey is required to accompany this planning submission as it is evident that the change of use will affect the potential habitat for bats or other protected species.

## Suggested Conditions

- 6.15 In order to ensure that the outbuilding remains ancillary to the main dwellinghouse for perpetuity and cannot be severed it is recommended that the following conditions be included on the decision notice:

- Condition 1:

The annexe building hereby approved shall only be occupied in connection with the residential use of the dwellinghouse on site and shall not be used as a separate unit of accommodation to the dwellinghouse on site.

Reason:

In the interests of protecting the open and rural character of the Green Belt.

- Condition 2:

The annex building hereby approved shall not be severed in ownership from the main dwellinghouse on site in perpetuity.

Reason:

In the interests of protecting the open and rural character of the Green Belt.

- 6.16 The first condition was taken from a previous approval to 'convert existing stable/barn into granny annexe' at Wolf Lowe Farm, Beat Lane in Rushton Spencer which Staffordshire Moorlands District Council approved under planning application number 12/01359/FUL. The second condition is suggested as this would clearly stipulate to future occupiers of Little Blythe Farm that the outbuilding could not be used as a separate dwellinghouse, in line with the previous appeal decision relating to the property which dismissed the refusal of planning permission 12/00990/FUL on the basis that it would create a new dwellinghouse in what was considered by the Planning Inspector to be an unsustainable location.

## **7. CONCLUSION**

- 7.1 This planning statement has been submitted by Knights on behalf of Mr. S. Perkins and Mr. A. Perkins to accompany a full planning application seeking to retain the use of the outbuilding at the front of the property to allow uses incidental to the enjoyment of the residents of Little Blythe Farm. The granting of planning permission will enable the applicant to market the property and in turn providing prospective purchasers with certainty with regards to the lawful use of this building.
- 7.2 The proposed use is fully in compliance with the Green Belt and rural planning policies which support the re-use of existing rural buildings to facilitate sustainable development and would not introduce a new independent dwelling within the site. The scheme would represent an appropriate form of development within the Green Belt and would result in a net improvement in highway safety whilst not materially altering the appearance and scale of the application building. This statement also fully justifies that a non-employment use for this outbuilding is considered to be acceptable. This statement therefore demonstrates that the proposed scheme is fully in accordance with Staffordshire Moorlands District Council's Core Strategy as well as the guidance contained within the National Planning Policy Framework.
- 7.3 In accordance with paragraph 14 of the National Planning Policy Framework, the benefits of the proposal listed above are considered to significantly and demonstrably outweigh any harm that may arise as a result of the loss of a quasi-employment use of the site. The proposal would comprise sustainable development, and as such, in accordance with Section 38(6) of the 2004 Planning and Compulsory Purchase Act, that planning permission ought to be granted.

**Carl Copestake BA (Hons), Dip. UPI, MRTPI**  
**Partner**  
**Knights**

**Michael Askew Dip T&CP, MRTPI**  
**Senior Planner**  
**Knights**

## APPENDIX 1 – Statutory Declaration by Mr. S. Perkins [DRAFT]

### STATUTORY DECLARATION

I, Stephen Leslie Perkins of Swift Barn, Lower Heamies Farm, Chebsey, Stafford ST21 6JU, do solemnly and sincerely declare that:

1. I was born in 1954.
2. My mother and father purchased Little Blythe Farm, shown edged red on the plan now produced to me and marked “SLP1” in September 1975 (**Little Blythe Farm**). SLP1 is the filed plan at the Land Registry and it can be seen that all the buildings which form Little Blythe Farm are contained within the area registered and which my mother and father purchased in 1975.
3. When my mother and father purchased Little Blythe Farm there was an old cottage and outbuilding situate on it. There is now produced to me and marked “SLP2” a plan from and a note of a Conveyance of adjoining land in 1968 which shows that there were buildings on the land which forms Little Blythe Farm at this time. My father replaced the old cottage and outbuilding with the buildings identified on SLP1 as “Farmhouse” (**Farmhouse**) and “Annex” (**Annex**). There is now produced to me and marked “SLP3” a copy of an aerial photograph showing the Farmhouse and Annex as constructed by my father. From the height and growth of the planting I believe this photograph was taken in or around the late 1970’s. I had no record of a planning permission for this construction but my solicitors have made renewed enquiries with Staffordshire Moorlands District Council (**Council**) following the disclosure by them of the information referred to in paragraph 5 below. Those enquiries produced an approval of reserved matters reference SM.2725 dated 11 October 1976 (**1976 Approval**), which is now produced to me and marked “SLP4”. This refers to the building of “ a detached bungalow and garage at Little Blythe Leek Road Weston Coyney for Mr L Perkins” . I recollect that these works were completed during 1976.
4. There is now produced to me and marked “SLP3” a copy of a planning permission reference SM/2967 dated 12 November 1976 ( **1976 Planning Permission**). The description of the development on the Planning Permission is, “ Alteration to existing building to form cattle shed, tractor shed, garage and store at Little Blythe Leek Road Weston Coyney for Mr L Perkins”.
5. I was not aware of the 1976 Planning Permission before it was referred to in a letter sent to me by Mr Ben Hurst of Staffordshire Moorlands District Council dated 23 December 2014 although my planning consultants had previously undertaken a planning history search at Staffordshire Moorlands District Council (**Council**) and the Council had stated in reports and evidence in connection with a planning application and appeal for the Annex that there was no planning history for the Annex. My solicitors then obtained a copy of the Planning Permission and subsequently



requested a copy of the plans to accompany the Planning Permission but Staffordshire Moorlands District Council have not supplied these.[However, I believe that the 1976 Planning Permission relates to the Annex. ]

6. I lived with my family at Little Blythe Farm from completion of its construction in late 1976 until 1979, when I married and moved out to my own home. Whilst I lived at Little Blythe Farm I did not live in the Farmhouse, but rather my brother and I used the first floor of the Annex as sleeping accommodation. There were no bathroom facilities in the Annex and my brother and I used those in the Farmhouse. There were also no kitchen or cooking facilities in the Annex at this time and we had many of our meals with the family in the Farmhouse.
7. At this time the ground floor was used as my father's workshop in connection with the house and farm, a garage for the family car and as a cattleshed. After I moved out in 1979, I worked in the family plastering business at weekends and was in regular contact with my family. I recollect that my brother continued to sleep in the Annex.
8. In 1981 my grandfather died and my father moved the offices of the family plastering business, which my grandfather had run and my father took over, to the Annex. At this time I moved to the Middle East to work. My brother moved out of the Annex. A small kitchenette was installed around this time.
9. Since 1981 the family plastering business has occupied the first floor of the Annex. I returned to England in 1988 and re-joined the family business at this time. The first floor was still used as offices and has been since this time. There were usually 3 people in the office in the Annex; two family members (including my father) and an administrator who was not.
10. The ground floor continued to be used as a cattle shed, workshop and garage as stated above. The family plastering business also had a separate "depot" and items relating to the plastering business were stored there. There was , though, also some storage of items for the family plastering business in the ground floor of the Annex.
11. My father continued his involvement in the family business and worked in the Annex until he died in 2013. My father lived in the Farmhouse until his death.
12. Until 2015 there were no bathroom facilities in the Annex and the Farmhouse was always used for that purpose. From May 2014 until March 2015 refurbishment works have been undertaken to both the Farmhouse and the Annex to enable their sale following their purchase from my father's estate by my brother myself. By way of clarification, my mother died some years before in 2009. Very little improvement work had been undertaken to either building over a number of years; except for decoration no improvement works were carried out following completion of construction and the finishing of internal works in 1976/7.
13. My brother and I are now the registered proprietors of Little Blythe Farm including the Farmhouse and the Annex. During the refurbishment works both the Farmhouse and

the Annex have been used together for storage of domestic items from the house and for the family business. A portacabin has also been used which has been stationed in front of the Farmhouse.

14. I do recall that my father installed a fence between the points marked "A" "B" on SLP1 and the purpose of this was to prevent his dog from escaping on to the road. Pedestrian access to the Annex is from a doorway in the side elevation in front of the Farmhouse. This fence has now been removed.
15. My family has always used the Farmhouse and the Annex as if one building since their construction and the use of the Annex has been as additional accommodation to the Farmhouse.

**AND I MAKE THIS SOLEMN DECLARATION** conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835

**DECLARED** at

this                                      day of                                      2015

Before me

Solicitor/Commissioner for Oaths