

Statement of:



Age of Witness (If over 18 enter 'Over 18'):

Over 18

Occupation of Witness:



WITNESS STATEMENT OF



2. I am very familiar with the site of Knights Place Farmhouse, Cobham, North Rochester, ME2 3UB.

3. I first had contact with Mr Mark Lucas in 2011 in my capacity



I first visited Knights Place Farmhouse on 12 July 2013.

4. I have visited Knights Place Farmhouse on various other occasions since my first visit, sometimes with work colleagues. On each occasion I walked around and viewed the farmhouse and its surrounding gardens. I (or my accompanying colleagues from Smart Planning Limited) have taken photographs in the course of our work at the site visits.

5. I now have produced to me a site plan marked **JRF1** 21.7461/P203 that depicts Knights Place Farmhouse edged red and the land that is the subject of this application hatched red.

6. I confirm that from when I first visited Knights Place Farmhouse, and from my subsequent visits, the area hatched red on the above plan has formed and been used as part of the gardens and domestic gardens incidental to the enjoyment of Knights Place Farmhouse for the Lucas family.

7. The land hatched red on the plan was closely mowed lawn on my visits. There was a mature and clipped laurel hedge to the western boundary and also post and rail fencing to the western, southern and eastern boundaries of the land hatched red.

8. There was a dovecot positioned on the southern part of the land hatched red. There was a greenhouse, a shed and vegetable plots positioned adjacent to the eastern boundary of the land hatched red.

9. On my first visit, a trampoline was positioned to the north east of the land hatched red.

10. I have presented to me a Google Earth Pro Image of Knights Place Farmhouse marked **JRF2** taken no later than 9 July 2013. All of the above listed garden features can be identified in this image and are labelled on the image accordingly including: the post and rail fencing and the hedging; the dovecot; the greenhouse; the shed; vegetable plots and the trampoline.
11. On 12 July 2013 when I first visited the site, a number of photographs were taken as part of my site visit (marked **JRF3-JRF6**).
12. I have presented to me a photograph marked **JRF3** taken 12 July 2013. This shows the greenhouse, shed and vegetable plots, hedge and post and rail fence marked on the Google Earth Pro Image. The lawn area is also closely mowed.
13. I have presented to me a photograph marked **JRF4** taken 12 July 2013. This shows the dovecot marked on the Google Earth Pro Image. The lawn area is also closely mowed.
14. I have presented to me a photograph marked **JRF5** taken 12 July 2013. This shows the trampoline marked on the Google Earth Pro Image. The lawn area is also closely mowed and the sit on lawnmower can be seen parked to the side.
15. I have presented to me a photograph marked **JRF6** taken 12 July 2013. This shows the hedge and post and rail fencing and greenhouse to the left marked on the Google Earth Pro Image. The lawn area is also closely mowed, and Mr Lucas' dog can be seen sitting in the garden.
16. On another occasion when I visited Knights Place Farmhouse on 19 September 2013 a number of photographs were taken as part of my site visit (marked **JRF7-JRF8**).
17. I have presented to me a photograph marked **JRF7** taken 19 September 2013 which shows the greenhouse also marked on the Google Earth Pro Image.
18. I have a photograph presented to me marked **JRF8** taken 19 September 2013 which shows the dovecot marked also on the Google Earth Pro Image.
19. During my visits to Knights Place Farmhouse from 2013 I can confirm that the land hatched red was used as domestic gardens incidental to the enjoyment of Knights Place Farmhouse for the Lucas family. This is due to the above features described and shown in the Google Earth Pro Image and photographs **JRF2-8**. The entire area was closely mowed and maintained.

20. During my visits to the farmhouse, I also saw the area hatched red being actively used as garden by Mr Lucas and his family.

This statement consisting of 11 page(s) (including **JRF1-8**) and signed by me is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signed

A black rectangular box redacting the signature of the person who signed the statement.

Dated this day the 25 day of July 2023

Subject of LDC
"Land used for purposes incidental
to the enjoyment of the dwelling"

Undisputed Curtilage

JRF1

Client Name : Mr M Lucas

Project Title : Knights Place Farm, Cobham, North Rochester, ME2 3UB

Drawing Name : Site Plan

Scale : 1:1250 @ A3

Drawn/Checked: ZAH/AQ

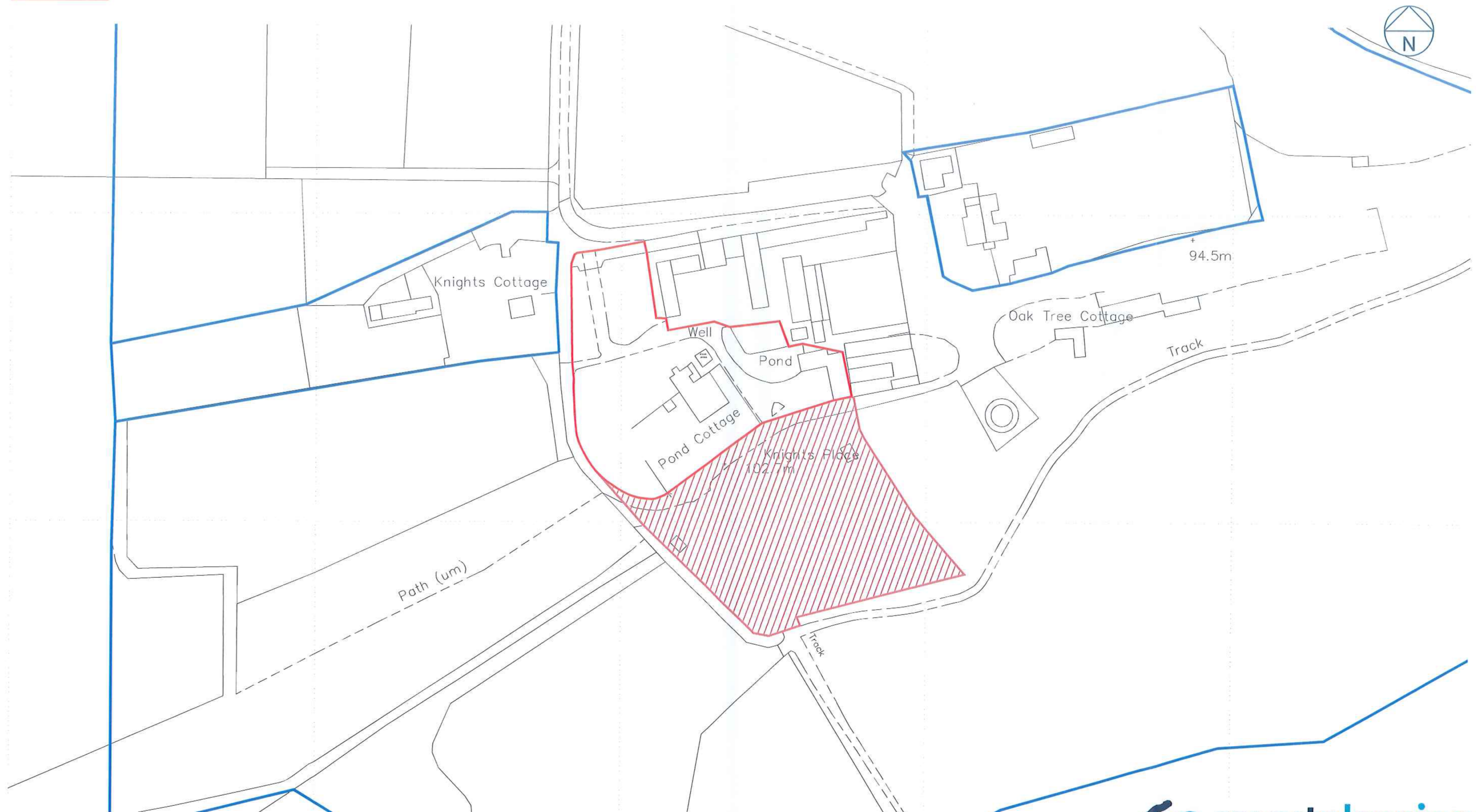
Status : Application

Rev : A

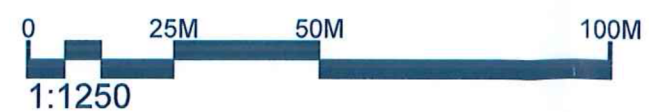
Date : 21 August 2021

Plot Date : 07 September 2022 16:16:58

Dwg No : 21.7461/P203



Note:
This drawing is provided for planning application purposes only and should not be
used or relied upon for Building Regulations applications or in the use of Construction.
All dimensions should be checked on site before the commencement of any works or
ordering of materials. Any discrepancies should be reported to Smart Planning Ltd.



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A	07.09.22	Boundary line revised	ZAH
No.	Date	Amendment	Initials

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Client Name : Mr M Lucas			
Project Title : Knights Place Farm, Cobham, North Rochester, ME2 3UB			
Drawing Name : Aerial Plan dated by Google Maps 2013			
Scale : NTS @ A3	Drawn/Checked: GF/AQ	Status : Application	Rev: -
Date : 24 May 2023	Plot Date : 18 July 2023 11:09:41	Dwg No : 21.7461/M003	



Note:
This plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. Any discrepancies should be reported to Smart Planning Ltd.

JRF3



JRF4



JRF5



JRF6



JRF7



JRF8

