

J Pearse
4 Woodrow Drive, RG40 1RS

Ref: PA 251221 – Cert Lawfulness – land rear 302 and rear 304 London Road, RG40 1RD

OBJECTION NUMBER 1: Application contains relevant inaccurate and/or misleading and/or incomplete information.

❖ **Application PP-140399994 – submitted online**

Page 5: Question: “Information in support of a lawful Development Certificate

Answer given is incorrect. The land to rear of 302 London Road within the red line of the application was **purchased** by the Applicant in **July 2006 NOT 31-12-1998**. The building garage/workshop on the land rear 302 London Road was constructed sometime between 2006 and 2008.

Page 5: Question “in case of an existing use of land, has there been any material change of use of the land since the start of the use for which a certificate is sought?

Answer given is incorrect. Box ‘no’ has been ticked. The application is for **VERY SIGNIFICANT MATERIAL CHANGE OF USE** from entirely **Residential to B2 General Industrial** in a residential area without any General Industrial use in the vicinity. Prior to purchase by the Applicant in July 2006 the land subject of this application was entirely **RESIDENTIAL** garden to the house number 302 London Road which was sold in 2017 and became Mulberry Veterinary Practice. Construction of the garage/workshop was done after the purchase in 2006.

❖ **Davis Planning Ltd – Planning Statement. Page 5 : Site history**

None of the numerous **Planning Enforcements have been listed**.

Additional to PA222556 there are 3 further relevant Planning Applications for discharge of Conditions – PA232529, PA240706 and PA242269

❖ **My Objection Number 2.** (lodged separately)

Access and vehicle turning for all Planning Units 1, 2 and 3 which must be kept clear at all times. Area has been included in Application 251221

❖ **My Objection Number 3.** (lodged separately)

Area fenced for sole use by Mulberry Veterinary Practice from at least July 2021 to March 2022. This was **known to both Applicant and Planning Agent** but the land was still included within the area of Application 251221 as being “10-year continuous use” which cannot be true.

❖ **My Objection Number 4.** (lodged separately)

Sworn letters (Applicant Appendices 1-10) are vague and misleading – no reference to specific areas within whole site, no dates of work claimed to have been done, no supporting evidence.

❖ **My Objection Number 5.** (lodged separately)

Photographs submitted by Applicant against his Appendix 12 are **misleading and/or incorrect and a lack evidence that could be expected** e.g. Environ Agency card number on public record, Hazardous Waste consignment certificates, invoices, receipts. Photographs showing vehicles are not all taken on the site to rear of 304 and/or rear of 302 London Road. All “site” photographs are undated.

❖ **My Objection 6.** (lodged separately)

2025 Aerial view is incorrectly labelled. This has to be between February 2023 and 4 October 2023.

❖ **My Objection 7.** (lodged separately). Areas that should be excluded from this application as 10-year continuous sole use for car-repairs cannot be proven.