

**IN THE MATTER OF THE TOWN AND COUNTRY PLANNING ACT 1990:
SECTION 191 AS AMENDED BY SECTION 10 OF THE PLANNING AND
COMPENSATION ACT 1991 AND THE TOWN AND COUNTRY PLANNING
(GENERAL DEVELOPMENT PROCEDURE) ORDER 2015**

AFFIDAVIT OF STEPHEN ARTHUR FRANK COX-RUSBRIDGE

In respect of property known as
Pennicotts Farm and No.2 Pennicotts Farm, Pagham Road, Pagham, PO20 1LN

I, **Stephen Arthur Frank Cox-Rusbridge** of Copyhold Farm, Lagness, Chichester, West Sussex, PO20 1LN do solemnly and sincerely affirm the following:

1. I make this Affidavit in respect of matters relating to the lawful planning use of the property known as Pennicotts Farm and No.2 Pennicotts Farm, Pagham Road, Pagham, PO20 1LN. The extent of the properties are denoted and outlined on the site plan appended as *Exhibit A*.
2. The internal arrangements of the properties are indicated on the existing plans and elevations set of drawings prepared by my Architect "Building Doctors", appended as *Exhibit B*. I can confirm that they are an accurate representation of the existing layout and use of the rooms within the building.
3. The property is a Listed Building but it is in a poor state of repair, as evidenced in the photo sheet prepared by my Architects, appended as *Exhibit C*.
4. The property is the main farmhouse for Pennicotts Farm and has been in the family for over a hundred years. My grandparents lived in the property whilst they ran the farm, when they also incorporated a small farm shop within the front porch/conservatory.
5. My grandmother, Joan Rusbridge, lived alone in the property following the death of her husband in the late 60's. She rented parts of the property to tenants from the late 1970's, with the tenanted accommodation having its own door and accommodation separate from the rest of the house. Both properties had their own bathroom/WC, kitchen, living and bedroom accommodation which remains today as evidenced in *Exhibits B and C*.

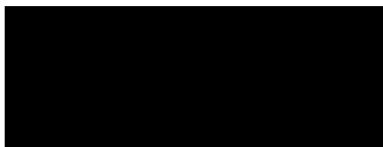
6. The tenanted accommodation became known as No.2 Pennicotts Farm and to all intents and purposes the two properties were used as separate and self-contained properties.
7. My parents lived at nearby Copyhold Farm that I now occupy. My grandmother's health started to deteriorate and in 1981 the decision was made by my parents to move into Pennicotts Farm and for my grandmother to move into No. 2 Pennicotts. The then tenants of No.2 were relocated to Copyhold Farm. The upstairs was blocked off so there were no stairs for my grandmother to cope with.
8. I joined the HM Forces (Army) in 1984 whilst the rest of my family continued living in the main house. My grandmother died in 1987 and so to help in farm finances No.2 was again rented out by my parents to various tenants. My father died in 1989, leaving only my mother, Dorothy, and brother, Alex in the main house, but different tenants continued to occupy No.2. I have provided a list of the previous tenants that I recall on a separate sheet evidenced as *Exhibit D*.
9. The property became known as No.2 Pennicotts Farm and a separate electric meter was installed on 09/12/2006. There is no gas connection to the premises.
10. My mother's health also started to deteriorate over a number of years with early onset dementia and diabetes. My brother Alex, as well as running the farm also had to assist with her care, with help from Social Services. My mother passed away in 2011 after being in a nursing home for 18 months.
11. During these times various tenants occupied No.2 although I have been unable find any records of any formal tenancy agreements. My parents did not register No.2 as a separate entity and relied on cash payments as rent, which was all used to support the running of the farm.
12. When I left the Army in 1999 I moved into Copyhold Farm with my wife and son and have lived there since. My brother is now the only occupant of the main part of the house, with the last tenant in No.2 being a Mr Peter Lamont/Tuck.
13. It is my intention to refurbish the property and for my brother to move into No.2, whilst the main house will be rented out as a self-contained property, so as to assist in the finances of operating the farm and securing its long term viability for my family.

The facts and matters set out in this affidavit are within my knowledge and true.

On 19th August 2020

[SWORN] or [AFFIRMED] BY STEPHEN ARTHUR FRANK COX-RUSBRIDGE

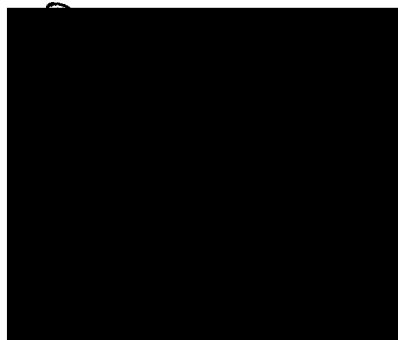
Signature



this 19th August 2020

Before me

[Signature of person before whom affidavit was sworn]



[Name of person before whom affidavit was sworn]

SARAH WILLIAMS
SOLICITOR SRA 507325
Date:

[Solicitor]

[Address of person before whom affidavit was sworn]

Duncan Morris Solicitors Ltd
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EXHIBIT A
SITE PLAN

EXHIBIT B
EXISTING PLANS AND ELEVATIONS DRAWING SET

EXHIBIT C
PHOTO SHEET

EXHIBIT D
LIST OF KNOWN TENANTS