


**From:**   
**To:**  
**Subject:** Fw: Statement of Case on Appeal  
**Date:** 09 January 2018 15:52:19

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## Statement of Case On Appeal

ENFORCEMENT NOTICE CAMDEN COUNCIL REF EN17/1284

1. There has been no breach of planning control under Section A (1) (a) as the work effected was refurbishment of an existing structure built in 2005 which had been occupied CONTINUOUSLY as a residence. This structure is now immune from enforcement under both the ten year and four year time bar. See Time Limit. **First Secretary of State v Arun District Council and another [2006] EWCA Civ 1172** DATE: 10 Aug 2006. Town and country planning – Enforcement notice – Time limit – Change of use to single dwelling – Condition in planning permission prohibiting change of use to single dwelling – Whether time limit for enforcement action ten years or four years – Town and Country Planning Act 1990, ss 55(1), 171(B)(2), 171B(3).

2. I append as exhibits copies of correspondence with and documents conveyed to Camden Council and also a copy of Statutory Declaration of Robert. A. Litvoi dated 31 March 2017 which refers inter alia to the extant structure at paragraph 9.

Signed Jita Lukka  
Date.....