

DATED APRIL 2023

STATUTORY DECLARATION
RELATING TO

LAND AT BROADWAY FARM
BROAD OAK
BOTLEY, HAMPSHIRE

SO30 2EU

EXHIBIT 16

I, Louisa Jane Doe, Company Secretary and Chief Executive of CCW Services Ltd., at Broadway Farm, Broad Oak, Botley, Southampton SO30 2EU, do solemnly and sincerely declare that:

1. I started working with Maurice Doe in 1995. Since then, we have created several businesses. CCW Services Ltd was incorporated on the 27th August 2003, Registration number 04877852.
2. My role in the Company is principally to ensure the smooth running of the business, dealing with a great deal of detail allowing Maurice the time to work with clients and concentrate on strategy. I am the Head of Finance overseeing invoice payments and the like. I often gather information as part of research required to run the business hence over the years, I have built up a wealth of knowledge having been involved for over 28 years.
3. Broadway Farm at Botley is my main office although we have other sites which I often visit.
4. In 2006, I recall an area of land at Broadway Farm, as illustrated by the red line on **Plan 1 [Exhibit 1]** attached, was laid with cellular grass reinforced concrete paving to provide parking spaces for the Storage of Haulage vehicles and Trailers based at the Broadway Farm site for CCW Services Ltd, operating from Broadway Farm.
5. At that time the business was expanding and storage space was severely limited. The solution was to store goods and materials on trailers which could be recovered, attached to lorries and driven off to customers. The fields were often wet and due to the heavy weight of the vehicles combined with the merchandise, we had to think of something quickly otherwise we were in danger of losing business. I can remember we were parking up to 40 trailers on the land in 2006 which is why we were so desperate for somewhere to park the vehicles. Not all the trailers belonged to CCW Services. Some of the trailers belonged to customers such as the Co-Operative Group, 3663, One-Stop, Johnson and Johnson, Palmer and Harvey and Keystone, for example.
6. Some of the vehicles and trailers were so heavy they were sinking into the ground. Companies such as Polarcap and Estee Lauder brought trailers in with glass on boxed pallets proving very heavy to manoeuvre into the field.
7. Maurice and I discussed the matter following which Maurice then contacted Tony Heathfield at G&M Technical Services. The area and location of land considered the most appropriate for parking was agreed to be in the northeast corner of the site as shown on Plans 1 & 2 [**Exhibits 1 & 2**]. The reason for choosing this area was that the land had been used for parking

for a while before 2006, when it was just grass, and also because it was the most convenient to the yard and away from the road.

8. Tony was instructed to undertake the engineering works on an area of land at Broadway Farm, Broad Oak, Botley, Hampshire as illustrated by the red line on **Plan 2** attached. **Exhibit 2**.
9. During the years 2006 to the present day, and since before when it was just grass, the parking of vehicles and trailers been continuous and varied according to the requirements of the business. Whilst CCW Services have parked our own vehicles on the grasscrete apron, for which we have held Operator's Licences, the business has often been required to temporarily park up to 40 trailers on the land belonging to customers. For this reason, the numbers contained in the operator's Licence offers just a snapshot of the total numbers of vehicles parked.
10. From time to time I walked onto the grasscrete apron to find pallet numbers to establish what trailers needed to be moved to different customers so I have first-hand knowledge of parked vehicles on the land. There was a particularly busy time between 2013-2018 when we had a huge number of lorries and trailers on the site because we had insufficient warehousing space.
11. For a number of years we, the business, have needed Operator's Licences in accordance with the Goods Vehicles (Licencing of Operators) Act 1995 to operate both haulage vehicles including trailers. In order to secure the licences, we have been required to have appropriate and sufficient parking provision. This has been the grasscrete parking apron.
12. An Operator's Licence was first granted personally to Maurice Doe in 1995 but the first paper evidence available of any Licence is dated 2005 Ref: OH0216927 [**Exhibit 12a**]. It should be noted on page 2 of Exhibit 12a, that it was open to the Traffic Commissioner to review the suitability of the approved operating centre at any time. This initial Licence was authorised for 6 motor vehicles and 2 trailers.
13. I applied for all the Operator's Licences and dealt with the paperwork.
14. On the 28th June 2010 an Operator's Licence (**Exhibit 12**) was granted to CCW Services Ltd, to park vehicles (weight 7.5 tonnes) in addition to trailers (length 12 metres). The Licenced Operating Centre was Broadway Farm, Botley.
15. This Operator's Licence has been renewed several times since 2010 on the following dates and remains valid for the parking of vehicles and trailers

which continues to this day. Not all the paperwork is available but the following documents are included for reference.

- a. November 2009 – Notice in the Daily Echo [**Exhibit 13**]
- b. August 2016 – see Public Notice in Southern Daily Echo for 18th June 2016 (**Exhibits 14 and 28**)
- c. June 2017 – See Table below and Operator's Licence [**Exhibit 23**]
- d. December 2018 – see Public Notice in Daily Echo 5th September 2018 and Operator's Licence (**Exhibits 14 and 24**)
- e. June 2019 – see Public Notice in Daily Echo 24th May 2019 and Operator's Licence (**Exhibits 14 and 25**)
- f. November 2019 – see Public Notice in Daily Echo 30th September 2019 and Operator's Licence (**Exhibits 14 and 26**)
- g. March 2020 – see Public Notice in Daily Echo dated 26th February 2020 and Operator's Licence (**Exhibits 14 and 27**)

16. The Table 1 below illustrates the changes to the Operator's Licence from 1995 to the present day.

Table 1.

Year Date	Total Number	7.5tonne	18tonne	44tonne	Trailers	Licence name	Licence type
May-95	6	4			2	MD	Restricted
May-05	6	4			2	MD	Restricted
Mar-05	6	4			2	MD	Standard National
June-10	6	4			2	CCW	Standard National
Aug-16	11	2		5	4	CCW	Standard International
Jun-17	15	1		8	6	CCW	Standard International
Dec-18	26		2	12	12	CCW	Standard International
Jun -19	32			17	15	CCW	Standard International
Nov-19	46			19	27	CCW	Standard International
Feb-20	47			20	27	CCW	Standard International

17. The current Licence provides for the parking of 20 lorries and 27 trailers.
18. The original operator's licence application and all the subsequent renewal applications have been widely advertised within the Press (**Exhibits 13-14 inclusive**) whilst the Central Licensing Office submits details of all applications to organisations including Local Authorities, the Police and Trade Associations who have the right to object to the grant of an application. To the best of my knowledge no objections have been raised since 2010.
19. The land, as illustrated on **Plan 1**, has been used continuously for the parking of the vehicles and trailers since before 2006. Most, if not all the vehicles and trailers have been working daily with parking necessary overnight.
20. In April 2020, for road safety and operational reasons the grasscrete area was capped with a layer of Tarmacadam. This was done to stop grass and soil being transferred onto site access roads and the main public highway. I remember discussing the matter with Maurice and it was agreed he would contact Tony Heathfield to undertake the work.
21. The initial grasscrete surfacing installed in 2006 remains in place beneath the Tarmacadam since 2006 and has not been removed. See photograph 2 – **Exhibits 8 & 9**.
22. On Friday the 24th February 2023, I am aware that 4 test holes were dug taken from each corner of the car parking apron site as illustrated on **Plan 2** attached. (**Exhibit 6**)
23. Photograph 3 [**Exhibit 11**] clearly shows the Tarmacadam on the surface with Photograph 2 [**Exhibit 9**] illustrating the 35cm depth of hole with the concrete grasscrete just below the tarmacadam. Beneath the grasscrete is a further layer measuring some 25cm of hard core and rubble which formed the basis for the grasscrete set down in 2006.
24. Parking for a specified number of vehicles and trailers has been a requirement of the company's Operating licence since the 28 June 2010. The numbers of vehicles and trailers on site is approved and monitored by the Traffic Commissioner authority. The licence is renewable on a regular five yearly basis, or when changes are required, and each renewal requires the parking arrangements to comply with the terms of the Operating licence. It has been continuously approved up to the present day.
25. In summary, I was party to the decision-making process in 2006 when the grasscrete parking apron was laid down by G&M Technical Services and I

arranged payment of the invoice. Since that time, I have seen the parking area used on a regular basis for the parking of vehicles to include heavy haulage lorries and trailers which has continued from 2006 until today.

26. I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

Signed
Louisa Jane Doe

Declared at

on April 2023

before me

Signed.....

~~A commissioner for oaths or~~ a solicitor empowered to administer oaths