

DATED APRIL 2023

STATUTORY DECLARATION
RELATING TO

LAND AT BROADWAY FARM
BROAD OAK
BOTLEY, HAMPSHIRE

SO30 2EU

EXHIBIT 15

I, Maurice Doe, Director of CCW Services Ltd., of Broadway Farm, Broad Oak, Botley, Southampton SO30 2EU, do solemnly and sincerely declare that:

1. I started running a pallets recycling and manufacturing company in 1992 from Broadway farm, Broadoak Botley.
2. My main role in 1992 was the Business owner, and I was directly involved in all aspects of the business.
3. I obtained our first Operator's Licence in 1995 in my own name, and the storage and operation was from Broadway Farm Broadoak Botley.
4. Both fields identified on the Plans at **Exhibits 1 & 2** were used for the parking of lorries and trailers from well before 2000, often with pallets and cages. I obtained my first Operators Licence for lorries and trailers in 1995, subsequently renewed it and I have been parking vehicles on the land continuously from about 1998.
5. In 2002 we started welding and fabrication of roll cages and shopping trolleys for companies such as the Co-op, Palmer Harvey Keystone (Macdonalds). They would drop their trailers to us and park them in the field identified on Plan 1. They would be loaded with damaged cages/trolleys and then, we would pull the trailers around to the workshop and unload and park the trailer back into the apron area. Once the cages were repaired, we would pull the trailer around to load with the repaired cage ready for collection, or swap and drop.
6. In 2006, the area identified on Plans 1 and 2 at Broadway Farm, **[Exhibits 1 & 2]** 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 (formally County Crest Welding Ltd), operating from Broadway Farm. I called Anthony Heathfield and instructed him to undertake the work.
7. The reasons for laying the grasscrete was to improve the efficiency and effectiveness of the business because at times, particularly when the ground was very wet, we had to use tractors to pull the heavy trailers out of the field.
8. In 2008 we were fortunate to start working with Estee Lauder, and we were storing goods on trailers for storage and distribution. The trailers would be loaded with glass or drums which were heavy, causing the lorries and trailers to sink into the ground. When the trailers / lorries were moving around the field, they had minimum grip to hold on to and proved difficult to manage.

9. During the years 2006 to the present day, the numbers of vehicles and trailers have varied according to the requirements of the business. Although a number of vehicles and trailers belonged to CCW Services, there were other vehicles belonging to customers also parked on the grasscrete apron either parked, awaiting loading, or collection for onward transportation to destinations around the UK and Europe.
10. On the 28th June 2010 an Operator's Licence (**Exhibit 12**) was granted to CCW Services Ltd, to park heavy commercial vehicles in addition to trailers (length 24 metres).
11. This Operator's Licence has been renewed, increasing vehicle numbers several times since 2010 on the following dates and remains valid for the parking of vehicles and trailers which continues to this day.
 - 11.1 August 2016 – see Public Notice in Southern Daily Echo for 18th June 2016 and the Licence (**Exhibits 14 and 28**)
 - 11.2 June 2017 Operator's Licence – (**Exhibit 23**)
 - 11.3 December 2018 – see Public Notice in Daily Echo 5th September 2018 and Operator's Licence (**Exhibits 14 and 24**)
 - 11.4 June 2019 – see Public Notice in Daily Echo 24th May 2019 and Operator's Licence (**Exhibits 14 and 25**)
 - 11.5 November 2019 – see Public Notice in Daily Echo 30th September 2019 and Operator's Licence (**Exhibits 14 and 26**)
 - 11.6 March 2020 – see Public Notice in Daily Echo dated 26th February 2020 and Operator's Licence (**Exhibits 14 and 27**)
12. The current Licence provides for the parking of 19 lorries and 27 trailers and unlimited vehicles up to 3.5 tonnes.
13. 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 1995 when I first obtained a licence.
14. The land, as illustrated on **Plan 1**, has been used for the parking of the vehicles and trailers since before 2006. During the international pandemic, the NHS has been using parts of the apron for the parking of emergency response vehicles since 2019.
15. It was in 2020 when I contacted Anthony Heathfield for advice about repairing the grasscrete parking apron primarily to improve the surface which was breaking up but incidentally to accommodate the NHS vehicles

to make driving vehicles on and off the land much easier and cleaner.

16. The initial grasscrete surfacing installed in 2006 remains in place beneath the Tarmacadam and has not been removed.
17. In order to verify the material in the ground, I called Anthony Heathfield in February 2023 and asked him to dig four trial holes, one in each corner of the site as per Exhibit 2. On Friday the 24th February 2023, 4 core samples were dug and photographs were taken, all showing the Terram membrane with the hardcore on top followed by the concrete cellular grasscrete. (See Exhibits 7 – 11 inclusive).
18. Each core sample clearly shows the Tarmacadam on the surface with the grasscrete immediately below.
19. Parking for a specified number of vehicles and trailers has been a requirement of the company's Operating license since before 28 June 2010. The numbers of vehicles and trailers on site is approved and monitored by the transport authority. The licence is renewable on a five yearly basis 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 whilst the land has been used continuously for the parking of vehicles and trailers since well before 2006.
20. It is my recollection that the land identified in Plan 1 has been in operation for more than 10 years.
21. I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

Signed.....
Maurice Doe

Declared at

on April 2023

before me

Signed.....

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

