

DATED APRIL 2023

STATUTORY DECLARATION
RELATING TO

LAND AT BROADWAY FARM
BROAD OAK
BOTLEY, HAMPSHIRE

SO30 2EU

EXHIBIT 4

I, Anthony Heathfield, Director of G&M Technical Services, St Francis, 66 St Johns Road, Hedge End, Southampton SO30 4AG, do solemnly and sincerely declare that:

1. G&M Technical Services was founded in 1988, a company specialising in surfacing and ground works as well as block paving and tarmac.
2. I started work with G&M Technical Services in 1990 as an electrician's apprentice finally qualifying in 1995. During the early years I spent most of my time refurbishing industrial units by digging trenches and laying cables to increase power to the buildings.
3. In 1996/97 I started to specialise in groundworks as G&M started to diversify its business. I would dig trenches, lay electric cables and then backfill with concrete and tarmacadam.
4. All this time I remained working with my Father, Graham Heathfield.
5. In 2006, Maurice Doe contacted me from CCW Services to instruct G&M Technical Services to undertake some engineering works on an area of land at Broadway Farm, Broad Oak, Botley, Hampshire as illustrated by the red line on **Plan 1** attached.
6. I was informed by Maurice that the purpose of the job was to create a stable parking area for heavy vehicles and trailers because otherwise they were sinking into the mud when the ground was wet. I remember he told me he was fed up using tractors to pull the trucks and trailers out of the muddy field. **Exhibit 2** shows the land in question.
7. After we discussed the job, I advised Maurice that the best way of creating a hard surface was to dig out an area by about 50cm deep, lay a Terram membrane and cover it with a type one crushed concrete before laying the cellular reinforced concrete grasscrete on the top.
8. I undertook the works myself with help from about 8 lads from my Company. The job took about 10 days altogether.
9. We dug out several tonnes of soil and laid most of it on the other fields although we did take some away but I cannot remember exactly how much or where we took it. I do recall we imported most of the crushed concrete from a recycling store at Burrridge.
10. I also remember that Maurice was quite clear where and how much land was to be covered by the grasscrete. He wanted the area to be large

enough to store trailers and trucks and have enough room to turn artic lorries with trailers because he was using the trailers for open storage at the time.

11. Unfortunately after 17 years we do not have any paper records for the job because we do not keep old invoices or payments for more than seven years and all our contracts with Maurice are verbal. He tells us what he wants, we offer some advice and he instructs us to do the work.
12. In 2020, Maurice contacted me again because the 14 year old grasscrete required repair and some maintenance given the heavy loads had damaged the grasscrete in places. We discussed the options and I suggested topping the grasscrete with Tarmacadam which would form a much-improved robust surface to carry the heavy weight of the vehicles and trailers.
13. The Tarmacadam surface solution also ensured the site would be cleaner and vehicles would not leave the site with muddy tyres onto the public highway.
14. In my professional opinion, whilst the function of the grasscrete and the Tarmacadam surfaces was very much the same, the Tarmac solution would provide a cleaner, more supportive, longer lasting surface for parked vehicles and trailers.
15. Maurice instructed me to undertake the work in the Autumn of 2020, so I personally covered the grasscrete with tarmac together with about 6-8 lads in my company.
16. Earlier this year I received a telephone call from Maurice asking if I had any paperwork proving that the original grasscrete work had been done in 2006 but after 17 years we just do not keep records that long.
17. In the absence of any paperwork, I was invited by Maurice at CCW Services Ltd to prove the work was undertaken for which reason I personally created 4 x trial holes in each of the four corners of the site where the engineering operation had taken place. See **Exhibit 2**.
18. On Friday the 24th February 2023, 4 test holes were dug, taken from each corner of the car parking apron site as illustrated on **Plan 2** attached. (**Exhibit 6**)
19. Photograph 1 [**Exhibit 7**] clearly shows the Tarmacadam on the surface with Photograph 2 [**Exhibits 8 & 9**] illustrating the 35cm and 40cm depth of hole with the concrete grasscrete just below the tarmacadam. Beneath the

grasscrete is a layer measuring some 25cm of hard core and rubble which formed the basis for the grasscrete set down in 2006. The Terram membrane is also visible at the bottom of the trial hole. Photographs 3 and 4 [Exhibits 10 & 11] show similar records of the below ground material.

20. I confirm I took the photographs.

21. I have been visiting the site at various times since 2006 and I have undertaken other groundworks around the site including the majority of the tarmacadam work.

22. During those years since 2006 I have seen parked vehicles and trailers on the land located in the northeast corner of the site but I have not kept records of each occasion. Over the last 17 years all I can say is that I have witnessed the parking of lorries, vans and trailers on the site in question through that time.

23. In conclusion, I personally carried out the engineering works in 2006 by the laying of the grasscrete. I repaired the surface in 2020 by laying tarmacadam on the top of the grasscrete and in February 2023 I dug the 4 trial holes and took the photographs which clearly show all the original works carried out in 2006 remain to this day.

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

Signed
Anthony Heathfield

Declared at

on April 2023

before me

Signed.....

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