

DATED

21<sup>st</sup> May 2021

2021

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**STATUTORY DECLARATION TO SUPPORT AN APPLICATION FOR A  
CERTIFICATE OF LAWFULNESS OF EXISTING USE OR DEVELOPMENT  
(CLEUD) PURSUANT TO S191 TOWN AND COUNTRY PLANNING ACT 1990**

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**MICHAEL PAUL WELLS**

**COED Y CEFN HOUSE, RHYD Y GWERN LANE, MACHEN**

**Geldards**  
law firm

I, Michael Paul Wells, of Mackworth House 60 Llwybr Y Coetir, Caerphilly CF83 3SS do solemnly and sincerely declare that:

1. This statutory declaration is given in support of an application for a certificate of lawfulness for the use of land at Coed Y Cefn House, Rhyd Y Gwern Lane, Machen as shown edged red on the plan produced and shown to me marked "**MPW1**" ("the Site").
2. I am a Contracts Manager for Bond Demolition Ltd which provides demolition and construction services. I have been employed by the company for over fourteen years, and I have recently become involved with overseeing the residential development side of the business. I am directly involved in obtaining planning permission for projects through to construction and the sale/rental thereof. Bond Demolition Ltd is part of a group of companies which operate in the construction industry. My Father, Paul Wells, is a group director and has an integral role in the running of Bond Demolition Ltd.
3. In April 2009 my Father, Paul Wells, purchased the Site together with the adjacent dwelling known as Coed Y Cefn House. I am aware that prior to my Father purchasing the property, the dwelling was owned and occupied by Mr Elton who was a builder. Mr Elton passed away in or around 2008. Shortly after my Father bought the dwelling, I visited the dwelling and I can recall seeing many of Mr Elton's belongings such as his clothes inside the dwelling. Following Mr Elton's death in 2008, the property remained unoccupied for a period of time (approximately one year) whilst it was advertised for sale. During the period it remained unoccupied, the dwelling was vandalised by criminals who damaged the property by smashing some of the windows and removed fixtures such as the snooker table.
4. Mr Elton also owned and occupied the Site, on which there were two workshops. There is now produced and shown to me marked "**MPW2**" which are a series of aerial photographs of the Site dated 1973, 1979, 1984 and 1989 that I obtained from the Welsh Government Historic Aerial Photography archive and I have annotated to point out the workshops. When my Father bought the property in 2009, I can recall that the most southernly workshop was physically intact and contained an array of woodworking tools and plant and machinery such as table saws, chisels, lathes, and pillar drives and also contained raw timber. The workshop also contained a toilet area which was connected to a foul sewer within the Site. The workshop to the north was in a poorer condition; the roof had been removed, although there were still some internal and external walls in place. There were also piles of roof tiles, window frames, window glass and general building materials (such as building sand) near to the workshops on the Site. There was also remaining on the Site a flatbed truck near to the entrance to the adjacent forestry.
5. I am aware, from discussions with the neighbour, Mr Alan Whittingham, and the owner of Rhyd Y Gwern Farm, that Mr Elton operated a construction and woodworking business from these workshops known as A J Building Services. Mr Elton's woodworking tools and equipment were still remaining in the workshops when my Father acquired the property, and it was evident to me that Mr Elton must have operated a substantial woodworking enterprise from the Site. I am also aware that the workshops were previously used as poultry houses in connection with an egg production business that Mr Elton had previously operated from the Site. There is now produced and shown to me marked "**MPW3**" a copy of the planning permission for the poultry houses dated

- c.1970, together with an extract from the application for permission which confirms that the use prior to use as a poultry house was grassland. Mr Elton also described himself on the application as a Building General Foreman.
6. In December 2009, my Father obtained planning permission to demolish the former Coed Y Cefn House and construct a new dwelling on the footprint of the previous dwelling. The decision was made to demolish the former dwelling due to concerns over its structural integrity. The demolition was undertaken by Bond Demolition Ltd in early 2010. The workshops were also demolished in early 2011 due to health and safety concerns associated with their respective structures and the asbestos roof which remained on one of the workshops. There is now produced and shown to me photographs marked "**MPW4**" showing the top slab of the foundations upon which the workshops were erected, and also shows the remnants of the walls of one of the workshops which still remains on the Site today.
  7. There is now produced and shown to me marked "**MPW5**" a photograph dated c.1989 which shows the former Coed Y Cefn House prior to its demolition. Part of one of the workshops, as described in paragraph 4 above, is also visible on that photograph as are the piles of building materials near to the workshop. The double garage forming part of the Site which can be seen on the photograph remains on the Site (albeit that part of the garage is now bricked up). When my Father bought the property in April 2009, I recall that the double garage contained tools, timber and building materials. There is now produced and shown to me a photograph marked "**MPW6**" which I took recently and shows the garage as it stands on the Site today.
  8. In 2009 my Father arranged for Mr Jeffrey Casey, who was employed as a machine operative by Bond Demolition Ltd and owned a touring caravan, to bring his touring caravan on to the property to live there as a security guard to ensure that the property remained occupied whilst the new dwelling was being constructed. Mr Casey originally sited his caravan alongside the dwelling but later moved his caravan on to the Site alongside the double garage. Mr Casey lived in the touring caravan until 2011 when he ceased working for Bond Demolition Ltd.
  9. Following Mr Casey's departure, my Father remained concerned about the security of the property and subsequently purchased a static caravan and erected it on the part of the Site that the workshops once stood. I moved into the static caravan in 2011 and I took over the responsibility of occupying the property and helping to keep it secure whilst the construction works were ongoing in respect of the new dwelling. I lived at the caravan on a full-time basis. Although my Father completed the replacement dwelling and subsequently moved in in 2015, I continued to live in the caravan until 2017 because I was waiting for my new-build dwelling to be constructed in Caerphilly (in which I currently reside). There is now produced and shown to me marked "**MPW7**" photographs of the static caravan which remain on the Site in the same location, although since I moved out in 2017 the caravan has not been used in any permanent residential capacity.
  10. Since my Father acquired the property in April 2009, the Site has also been used as a storage and salvage yard for purposes in connection with the running of Bond Demolition Ltd. For example, we will use the Site to store salvaged material from demolition projects (for example, dressed stone, slate, timber etc) which Bond Demolition Ltd employees will sort through and reuse for other

construction projects or re-sale. I can confirm that this use remains ongoing. There is now produced and shown to me marked "MPW8" photographs of materials stored on the Site in connection with the running of Bond Demolition Ltd. We also use the Site to store commercial plant and machinery such as diggers and trailers as can be seen from the photograph at "MPW9", and a cement mixer as can be seen in one of the photographs at MP7. There is also stored on the Site, since 2010 two metal containers, which are visible from the photographs at "MPW10" in which we store salvaged materials from building projects. The Site is a very convenient location for the storage of building materials and commercial equipment in connection with the running of Bond Demolition Ltd because it is such a large area.

11. Employees of Bond Demolition Ltd will sometimes use the static caravan on the Site for shelter and welfare services when sorting through materials stored on Site. The Site was also used to store building materials whilst the demolition and the construction of the replacement dwelling was ongoing between 2010 and 2014.
12. I regularly attend the Site, both to visit my Father at Coed Y Cefn House and also to collect and check materials in connection with my employment. I can confirm that building materials, plant and machinery used in connection with the running of Bond Demolition continue to be stored on the Site.

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

Declared by Michael Paul Wells

at *S PICCOLLI SQUARE, CNERPHILLY*

on *21<sup>st</sup> May 2021*

before me

Signed.....

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**EXHIBIT MPW1**

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This is Exhibit MPW1 referred to in the Statutory Declaration of Michael Paul Wells  
relating to Cefn Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated...*21<sup>st</sup> May 2021*.....

Before me.

[REDACTED]

Solicitor/Commissioner for Oaths

1) Site Plan  
Scale: 1:1250 @ A3



Casphilly County Borough Council  
17 DEC 2019  
Planning Services

19/1007

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REV	DESCRIPTION	DATE
001	MIKE WELLS	
	JOB TITLE	
	MACHEN, COED-Y-CEFN HOUSE	
	DRAWING TITLE	
	SITE LOCATION PLAN	

SCALE	DATE	DRAWN BY
1:1250	dec 19	elh
1948	SL 01	

to Cold Taps  
Newport  
NP23 5PH  
[www.hammond-ld.co.uk](http://www.hammond-ld.co.uk)  
01633 44396  
info@hammond-ld.co.uk

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Witness Statement: M. P. Wells  
Exhibit: MPW2

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**EXHIBIT MPW2**

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This is Exhibit MPW2 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated...*21<sup>st</sup> May 2021*.....

Before me....

[REDACTED]

Solicitor/Commissioner for Oaths



Welsh Government Ordnance Survey 73/063 frame 036 enlarged 3 April 1973 ©Crown copyright

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or used in the compilation of topographic maps without the previous written consent of the Ordnance Survey

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**EXHIBIT MPW3**

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This is Exhibit MPW3 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated *21<sup>st</sup> May 2021*

Before me. [REDACTED]

Solicitor/Commissioner for Oaths

PLANNING AND DEVELOPMENT DEPARTMENT  
PERMISSION FOR DEVELOPMENT

RECEIVED  
PLANNING  
DEPARTMENT  
CITY OF  
MONTGOMERY, ALA.

Application for permission to develop land at [Address] [City, State]

Name of Applicant: [Name] [Address]

Description of Proposed Development: [Description]

THE MONTGOMERY COUNTY COUNCIL, as the Local Planning Authority, for the Administration County of Montgomery, hereby PERMITS the proposed development to be carried out in accordance with the plans of any kind submitted with the said Application, subject to compliance with the conditions (if any) specified below:

- conditions
1. The buildings shall be first used by [Name] [Address] for [purpose] or for their maintenance of egg production.
  2. Building operations shall be commenced within one year of the date of the planning permission.

This permission is granted subject to the provisions of the proposed development, subject to compliance with the conditions (if any) specified above.

in conformity with the requirements of the Ministry of Technology.

RECEIVED  
24 FEB 1967  
CRDC  
WASHINGTON, D.C.

1. All forms must be prepared in ink and the applicant's name in the application and on the plans must be the same.  
2. Plans to be made in duplicate.  
3. Plans to be made in duplicate.  
4. Plans to be made in duplicate.  
5. Plans to be made in duplicate.  
6. Plans to be made in duplicate.  
7. Plans to be made in duplicate.  
8. Plans to be made in duplicate.  
9. Plans to be made in duplicate.  
10. Plans to be made in duplicate.

To: Mr. NICHOLSON 122  
COMBUSTION ENGINEERING

Part 3 - General

1. Full Name: ANTHONY JAMES ELTON  
Occupation: BUILDING GENERAL FOREMAN / AGENT  
2. Present Address: CORD-Y-CEAN COTTAGE, KHYDTWERN LANE, MACHEN, NEWPORT.

3. Position of the applicant's interest in the land (e.g., owner, leaseholder, etc.): OWNER

4. Address of location on the land to be developed or used and to which it is to be used: Paddock to the rear of CORD-Y-CEAN COTTAGE

5. State briefly the proposed development, including the purpose and the nature of the buildings to be erected, if they are to be used for other than the purpose stated: Poultry House

6. State in general the extent of the land to be developed or used and the nature of the proposed development: Inland

7. State whether the proposed development is to be carried out in one or more stages: 1/2

Part 4 - Additional information required only if the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.

8. State whether the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.  
9. State whether the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.  
10. State whether the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.  
11. State whether the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.  
12. State whether the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.  
13. State whether the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.  
14. State whether the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.  
15. State whether the applicant is the proprietor of a business or is carrying on a business, and, where applicable, the name of the business.

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**EXHIBIT MPW4**

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This is Exhibit MPW4 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated. *21<sup>st</sup> May 2021*.....

Before me..

[REDACTED]

Solicitor/Commissioner for Oaths





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**EXHIBIT MPW5**

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This is Exhibit MPW5 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated. *21<sup>st</sup> May 2021*.....

Before me. [REDACTED]

Solicitor/Commissioner for Oaths




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**EXHIBIT MPW6**

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This is Exhibit MPW6 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

Declared.....  


Dated...*21<sup>st</sup> May 2021*...

Before me...  


Solicitor/Commissioner for Oaths



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**EXHIBIT MPW7**

---

This is Exhibit MPW7 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated *21<sup>st</sup> May 2021*.....

Before me....

[REDACTED]

Solicitor/Commissioner for Oaths



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**EXHIBIT MPW8**

---

This is Exhibit MPW8 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated *21<sup>st</sup> May 2021*.....

Before me..

[REDACTED]

Solicitor/Commissioner for Oaths









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**EXHIBIT MPW9**

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This is Exhibit MPW9 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated... *21<sup>st</sup> May 2021* ...

Before me..

[REDACTED]

Solicitor/Commissioner for Oaths



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**EXHIBIT MPW10**

---

This is Exhibit MPW10 referred to in the Statutory Declaration of Michael Paul Wells relating to Coed Y Cefn House, Rhyd Y Gwern Lane, Machen dated [            ]

[REDACTED]

Declared.....

Dated *21<sup>st</sup> May 2021*.....

Before me.. [REDACTED]

Solicitor/Commissioner for Oaths



PANORAMIC VIEW FROM THE SOUTH WEST BOUNDARY ACROSS THE VALLEY

