

DATED

21st May 2021

2021

**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**

JEFFERY WHITEFOOT

COED Y CEFN HOUSE, RHYD Y GWERN LANE, MACHEN

Geldards
law firm

I, Jeffery Whitefoot, of 38 Heol Barri, Energlyn, Caerphilly CF83 2LY 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 "JW1" ("the Site").
2. I am an electrical contractor and I have operated as an electrical contractor since November 1987 trading as "J W Electrical". I carry out a range of electrical installation work in commercial and domestic buildings together with fault finding of electrical wiring.
3. In or around 1988 or 1989 I was in the process of constructing a house in my hometown of Bedwas, South Wales. I asked around my contacts in my trade as to whether anyone knew of a tradesperson who could make high quality wooden framed windows for my new house. A contact of mine (I cannot recall who) suggested that I should contact Mr Elton who ran A J Building Services because they had previously purchased some windows from him. I was told that Mr Elton manufactured windows from the Site (which was at the back of his dwelling, Coed Y Cefn House) and I was provided with his address. Accordingly, I attended the Site to meet with Mr Elton to discuss my requirements and to obtain a quote for the work. There is now produced and shown to me an undated photograph marked "JW2". The building shown with the red arrow was Mr Elton's office, in which we discussed my requirements for the windows. I can recall that in that office there was a desk, filing cabinets and lots of paperwork. The building shown with the green arrow was one of Mr Elton's workshops (the other workshop which was also on the Site at the time of my visit appears to be in the process of being constructed from that photograph). At the time of my visit, Mr Elton showed me inside the workshops, and I recall there was a variety of woodworking machinery, tools and timber and it was clear to me that the workshop was very well set up to manufacture timber products and it all seemed very professional. From memory, there may also have been one or two of Mr Elton's employees working in the workshops at the time of my visit. I subsequently asked Mr Elton to proceed in manufacturing and fitting the windows and he subsequently visited my property and took some measurements. After he manufactured the windows from the Site, some of his employees or contractors fitted them for me in my new house in Bedwas. I thereafter returned to the Site and met with Mr Elton again in his office to pay him for manufacturing and installing the windows. I had no further contact with Mr Elton and I understand he passed away in or around 2008.
4. After Mr Elton passed away, Mr Paul Wells bought Coed Y Cefn House and the Site in or around 2009. I have known Mr Wells for most of my life having been at school with him (albeit he was a couple of years younger than me) and I have also undertaken electrical work on behalf of the company that he works for, Bond Demolition Ltd (as it is now known) which is a demolition and construction company. Mr Wells wanted to demolish the existing Coed Y Cefn House and replace it with another dwelling, so he asked me to isolate the power in the dwelling prior to the demolition to make it safe which I did so in or around 2010. Mr Wells also asked me to provide a connection to the double garage on the Site so that the construction workers could have shelter and tea making facilities. I can recall that one of the workshops, as mentioned in paragraph 3 above, was still intact, whereas the other was somewhat dilapidated with the

roof missing. There appeared to be a lot of power tools and machinery stored in the workshop that remained intact.

5. In or around early 2010, Mr Wells arranged for Mr Jeffrey Casey, who was a machine driver and worked for Bond Demolition Ltd, to live in a touring caravan next to Coed Y Cefn House and act as site security. I provided the electricity connection to his caravan which was initially sited near to the electricity substation as shown on the plan at **JW1**, however it was later moved to the Site when the workshops were demolished by Mr Wells. When Mr Casey moved off the Site, Mr Wells installed a static caravan on the footprint of the workshops, and I provided the electricity supply to the caravan. I am aware that Mr Michael Wells, Mr Paul Wells' son, lived in the static caravan for a number of years whilst the new Coed Y Cefn House was being built.

6. I have been back and forth to Coed Y Cefn House over the past ten years doing various electrical work for Mr Paul Wells in his house. During that time, the Site has been consistently used for the siting of a caravan and for storage of material relating to Bond Demolition Ltd. As Bond Demolition Ltd is a construction company, they will usually recover a lot of building materials from construction jobs and Mr Paul Wells has tended to use the Site as a safe space in which to store and sort through recovered materials. Examples of materials I have seen stored on the Site include dressed stone, timber, block paving stones and I have also seen plant and machinery such as a cement mixer and digger stored on the Site over the years. There is now produced and shown to me two undated photographs marked "**JW3**" in which I can see, in the first photograph, Mr Wells' new dwelling together with the static caravan and also the remnants of the old wall from one of the workshops. In the second photograph, I can see the garage which I provided the supply to for tea making and shelter purposes (as set out in paragraph 4 above), together with the static caravan and the storage of materials recovered from construction sites. There is also on the Site, and which can be seen from that photograph, two storage containers but I am not sure what these are used to store.

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 Jeffery Whitefoot

at *5 PICCADILLY SQUARE, LONDON W1A 3AX*

on *21st MAY 2021*

before me

Signed.....

EXHIBIT JW1

This is Exhibit JW1 referred to in the Statutory Declaration of Jeffery Whitefoot relating to Coe [REDACTED] ern Lane, Machen dated []

Declared.....

Dated..... *21st MAY 2021*

Before me...

Solicitor/Commissioner for Oaths



1) Site Plan
Scale 1:1250 @ A3

Caeffrynllwyd County Borough Council
17 DEC 2019
Planning Services

19/1007

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NAME: MIKE WELLS
JOB TITLE: MACHEN, COED-Y-CEFN HOUSE
DRAWING TITLE: SITE LOCATION PLAN

SCALE	DATE	ISSUED BY
1:1250	dec 19	gjh
1948	SL 01	

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EXHIBIT JW2

This is Exhibit JW2 referred to in the Statutory Declaration of Jeffery Whitefoot relating to ~~Good X Cafe House, 1400 X Queen Lane, Machen~~ dated []

[REDACTED]

Declared.....

Dated..... *21st MAY 2021*

Before me [REDACTED] ..

Solicitor/Commissioner for Oaths



EXHIBIT JW3

This is Exhibit JW3 referred to in the Statutory Declaration of Jeffery Whitefoot relating to [REDACTED] ern Lane, Machen dated [REDACTED]

Declared.....

Dated..... *21st MAY 2021*

Before me. [REDACTED]

Solicitor/Commissioner for Oaths



PANORAMIC VIEW FROM THE SOUTH WEST BOUNDARY ACROSS THE VALLEY

