

Litigation Activation — Human Action & Pre-Action Plan (8 October 2026)

Version 1.0.0 · 2026-10-23

Editors of the Great House Farm Legal Wiki

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Page 1653 of the Great House Farm Legal Wiki, carried over from the version last modified on 2026-10-21. The same page is published at research.bucklerfamily.estate, and this version is also a [PDF](#) in the wayback archive.

1 Release notes

1.1 This release (version 1.0.0)

- **2026-Oct-23** - Carried over to the docs library from Legal Wiki page 1653 (last modified 2026-10-21 19:45:55 UTC). The page text, dates and references are as on the wiki. Links to wiki pages lead to the same page on research.bucklerfamily.estate; images are links to their files on the wiki.

1.2 Older versions

None yet.

2 Record

This material now lives at <https://projects.bucklerfamily.estate/litigation-activation-human-action-pre-action-plan-8-october-2026/>.

Page ID: 1653 · **Title:** Litigation Activation — Human Action & Pre-Action Plan (8 October 2026) · **Evidence status:** Not yet labelled — see the Editing Protocol · **Version:** 1.0.0 · [Editing Protocol](#)

2.1 Litigation Activation — Parcel A Loss (9 October 2026)

Status: ACTIVE. This is the execution entry point for the established Parcel-A loss case. The 1939 agreement/plan is already held and its Parcel-B-only scope is closed; it is not a new acquisition task.

2.2 1. Case objective

The substantive loss concerns two areas of the **full Parcel-A house/quarrying estate**: the forest north of the house and the ground south-east of the house/garden that later became **VG41**. Parcel A also included the farmhouse, garden and associated house group, including the barn, stable and yard west of the house. Mary remained in occupation of that central group after resisting removal; that was the part she could practically defend, not the whole geographical extent she claimed.

The family’s established title chronology is that the 1877 arrangement took effect in 1928 when quarrying and rent to Thomas ended, carrying Parcel A—including forest and green ground—into the Williams family’s freehold. The 1939 WGR–John Williams agreement/plan is already obtained and shows Parcel B only. WGR’s later possession of Parcel B did not itself confer title or possession rights over the forest and green.

2.3 2. The 1955 control point

The family’s established account is that Western Ground Rents obtained an order worded for the “whole farm” and, on 4 July 1955, seized the Parcel-A forest north of the house and south-eastern green ground while enforcing possession of Parcel B. The farmhouse/buildings/garden group remained occupied because Mary fiercely resisted removal after a leg amputation and while caring for seven children. The physical fact that she held onto the central house group must not be conflated with a narrower claim to title or used to imply that Parcel A’s forest and green were left with her.

This now creates the key litigation question:

What documentary and legal route was used to extend enforcement of Parcel B over the Parcel-A forest and green—and how did the “whole farm” wording later make Mary’s occupation appear permissive from 1955 rather than recognising the family’s 1928 title case?

The answer cannot be obtained from the phrase “whole farm” alone. It requires the actual claim, order, warrant/writ, return of execution, plan/boundary description and contemporaneous evidence of physical possession.

2.4 3. Three separate legal tests

Control	Question	Why it matters
Judicial scope	What land did the 1955 claim/order actually adjudicate?	A possession order derives its authority from the judgment/order and identified premises.
Execution scope	What land did the writ/warrant and officer’s execution actually reach?	Taking land outside the lawful execution scope can create a distinct wrong even where an order existed.
Underlying entitlement	What title/right to possession did WGR have over that exact woodland /green land?	A “whole farm” description does not itself create title to a parcel which the claimant did not own or have a right to possess.

The modern procedural principle is reflected in current High Court enforcement rules: enforcement of a possession judgment operates through the writ/order for the identified land. Historical counsel must determine the law in force in 1955 and the precise effect of the actual process documents.

2.5 4. Why the 1962 case matters

The 1962 farmhouse-and-garden possession action is not a reason to reopen the 1939 document. It is evidence about **what WGR claimed had happened after 1955**.

Its key questions are:

- Did WGR say the farmhouse/garden were still outside its possession after the 1955 enforcement?
- Did WGR describe any other Parcel-A land as already taken?
- Did the claim seek mesne profits from 1955 on the basis that possession of the house/garden had already become WGR's?
- What plan or property description did the 1962 court use?

This creates a contemporaneous bridge between the physical taking in 1955 and the later “whole farm” title narrative.

2.6 5. Woodland: the real downstream title chain

The woodland must now be traced **backwards from the present title to the 1955 physical land**, rather than forwards from a general farm description.

Stage	Required primary evidence
1955	Execution footprint, plan and physical possession evidence.
1975	23 May 1975 conveyance and exact plan.
1982–83	WA231076 / WA240304 plans, applications, register class and requisitions.
1993–94	Ideal Homes acquisition and 10 Nov 1994 Forest of Cardiff transfer, plan and consideration.
2005	2 Dec 2005 Forest of Cardiff → Goldsworthy Homes transfer and plan; CYM265133/CYM349627 extent.
2026	Current WA735527 and successor titles, plans, proprietor and proposed disposition.

The critical outcome is one physical polygon followed through every stage. Every title name must be tested against that polygon.

2.7 6. VG41: the strongest new independent lead

The Wiki records VG41 as registered on 16 June 1970. Vale of Glamorgan Council states that its statutory common-land and town/village-green registers were compiled between 1967 and 1970 and that the registers record **details of claims to ownership**. The registers and maps can be inspected by appointment and copies can be obtained. Official Council source: [Search and view the Commons Register](#).

This makes the original VG41 registration file a high-value historical ownership record. It could answer who claimed the green in 1967–70, what land was claimed, what map was used, whether there were objections, and what evidence supported the claim.

That is more probative to the present case than another search through general rent records.

2.8 7. Current legal routes

2.8.1 7.1 Historical 1955 wrong / excess execution

Counsel must identify the cause of action that arose from the 1955 physical taking, the proper defendant, the law governing limitation in 1955 and thereafter, and whether later title/registration/purchaser events changed the present remedy. The project must not assume that a wrongful taking in 1955 automatically creates a recoverable present title in 2026.

2.8.2 7.2 Current woodland register

HM Land Registry's current guidance provides alteration/rectification mechanisms for qualifying register mistakes and expressly recognises wrongly included land as a potential alteration issue. Rectification and indemnity are separate questions. Official sources: [PG39](#) and [PG19](#).

2.8.3 7.3 Protective step before a possible 2027 woodland sale

Forest of Cardiff has indicated that the remaining woodland may go to the open market in early 2027. PG19 explains the unilateral-notice mechanism for qualifying third-party interests and the need to identify the affected part of a title. The family should **not** file a notice simply because it has a historic claim; counsel must first decide whether a presently protectable proprietary interest exists and define the exact polygon.

2.8.4 7.4 VG41 correction

Welsh Government publishes a procedure for correcting historical errors in common-land and green registers where statutory criteria are met. This does not imply that VG41 is wrong. It creates an additional legal/administrative test once the original registration record is obtained. Official source: [CA13 W](#).

2.9 8. Current human execution board

Priority	Deliverable	HubSpot
P0	1955 execution map and legal-authority reconstruction	P0-1955/1962-01
P0	Family first-hand statement + annotated Parcel-A woodland/VG41 map	P0-1955/1962-02
P0	Complete VG41 1967–70 registration file	P0-VG41-01
P0	Current title of VG41	P0-GREEN-02
P0	1955 woodland → 1994 → 2005 → current title chain	P0-WOOD-02
P0	Schedule 4 / Schedule 8 legal strategy	P0-LIT-02 / P0-LIT-03
P0	Protective notice / standstill decision	P0-WOOD-03 / P0-WOOD-04
P1	Historic court-file recovery	P1-COURT-01
P1	BP/Linklaters preservation and disclosure	P1-24 / P1-LNK-01

2.10 Chronology of the disputed conflation

1928: the 1877 arrangement took effect when quarrying and rent to Thomas ended; on Mary (Nancy) Williams's c.1974 witness statement ([Mary \(Nancy\) Williams testimony](#)), this established the family's Parcel-A freehold; its extent to include north forest and south-east green is SOURCE PENDING. **1949:** the first later effort to make the family's occupation appear permissive preceded the report that the title deed was missing in 1950–52; [SOURCE PENDING] this effort failed. **1955:** the "whole farm" wording blurred Parcel A and Frederick's Parcel-B agricultural tenancy, and enforcement physically took the north forest and south-east green along with Parcel B. Mary defended the occupied house/buildings/garden group, but was not physically able to defend the whole Parcel-A perimeter. **Limitation position:** the family's case is that a twelve-year adverse-possession period from 1928 would have matured by 1940 if the applicable statutory conditions were met; the 1955 recharacterisation instead made 1955 appear to be the operative starting point. The underlying-title argument and the alternative limitation argument must remain distinct. ?

2.11 9. Explicitly parked

1939 WGR agreement/plan: already obtained; Parcel-B-only conclusion closed.

D696 rental books: background corroboration only. They are not a priority work package unless a specific entry concerning Parcel A, woodland, VG41 or the 1955 taking is identified.

2.12 10. Litigation discipline

The current case should be framed as a chain of **physical land → legal authority → execution → downstream title → present remedy**. No party is labelled fraudulent merely because a later title description differs from the evidence on this wiki. Fraud becomes relevant only where a specific actor, conduct, mental element, materiality and causation can be proved.

Project test: every new piece of work must either prove/disprove the 1955 taking, identify the exact post-1955 owner

/claimant, trace the exact woodland/green polygon into the current title, or produce a legally usable current remedy. Anything else is secondary.

2.13 Page version & change log

Current version: 1.0.0

Version	Date (UTC)	Editor (human or agent name)	Change	Source / evidence
1.0.0	2026-10-18T15:31Z	Sion’s Tab agent	Footer standardised; earlier log rows carried into this table; no content change	Editing Protocol, 18 Oct 2026
	2026-10-18 (rollout date; exact time not separately recorded)	OpenAI-assisted maintenance agent (GPT-6)	Installed this page-local append-only change log and agent instructions. Existing page content was not intentionally rewritten.	User-directed site-wide changelog standard. Saved via WordPress API; public rendering of this page not yet independently checked.

Agents and editors: follow the [Editing Protocol](#).