WS1

[redacted] **Witness Statement**

In opposition to claims made in Lawful Development Certificate AVA/2026/0061

My name is [redacted] and together with my wife [redacted] and children [redacted] have continuously lived at the address known as [redacted] since I bought it with my wife on 6 January 2016, to the present day. (The property also has an address of [redacted])

I am compelled to write this statement in order to counter inaccurate assertions made in witness statements and in planning documents and architects drawings associated with application AVA-2026-0061, made in the name of Mr James Hollis.

The layout of the site constituting Tudor Lodge and [redacted] is that the stone outbuildings referred to in the application directly overlooks the residential property of [redacted]

This building directly abuts [redacted] property in that it shares a party wall with my own outbuilding, directly abuts a large elliptical flower bed belonging to [redacted] planted with heather and jasmine, is 8m squarely opposite my driveway, and is 12.5m squarely opposite the residential part of my property.

Since my first son was born, I have generally worked a four-day week meaning that I am around home for at least three days a week, and particularly since the Covid-19 outbreak and the rise of working from home, I am often around [redacted] during the day. Therefore I am ideally placed to have observed anybody making use of the stone outbuildings in any way and would have certainly observed if the areas were being used as described. Living here for over ten years, I have been present at the site many orders of magnitude more frequently than Mr James Holli[redacted]s. I had never observed Mr James Hollis present at the site of Tudor Lodge whatsoever until after the death o[redacted]s, and in fact had only ever met him once before [redacted]s' death (on the occasion of a party for [redacted]ds' 50th Birthday, held offsite at a restaurant). I never observed Mr Hollis to be present when repairs or maintenance was required, when general domestic help was required, when general 'DIY' jobs were required, or when the driveway or other areas of Tudor Lodge required repair. I never witnessed him being present at all[redacted] was only occasionally present at Tudor Lodge, and that was in the last few years of [redacted]s life.

Therefore witness statements as to the usage of the buildings made by my wife and myself, living directly opposite the arched buildings for over ten years, (for a large proportion of which we have been able to work from home, and therefore be around during the daytime), and statements made by regular visitors to our property, are a significantly more reliable source than those of Mr James Holli[redacted]s or the gardener to Tudor Lodge. Furthermore our witness statements are signed and dated, carrying more legal weight than those of James Hol[redacted]s which are not.

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I will now individually address claims made directly by the applicant in the Planning Document and those buried within the unsigned witness statements and architects plans of the site.

1. **Claim that the shallow blind arch behind the elliptical heather garden and jasmine hedge was used by [redacted] as an "informal seating and gathering area".**
   a. The area referred to above lies directly opposite the driveway of [redacted] and can be seen directly from our house. At no time during my ownership of [redacted] have I ever observed anybody from Tudor Lodge [redacted] or anybody else, enter this area whatsoever, for any purpose until after the death of [redacted] when [redacted] James Hollis and surveyors acting on their behalf began exploring the site, traversing our land without our permission.
   b. In Summer 2015, when purchasing our house, our vendors [redacted] showed us this arch area and a bench belonging to them, situated therein. They explained that it was their bench and that it was there with [redacted] permission, but that it was never used, and certainly never by [redacted] as this faced directly onto an elliptical portion of land belonging to [redacted] and onto the dwellinghouse of [redacted] itself. It is not possible to enter this arch any other way apart from by crossing the elliptical land belonging to [redacted] Upon our purchase of [redacted] in 2016, that bench became ours.
   c. I will state that at no time between January 2016 and September 2019 did I or anybody from my house or family ever use this bench, (which was by then in our possession), nor did we see it used by [redacted] or anybody else whatsoever.
   d. In 2019, a large beech tree belonging to [redacted] sadly had to be cut down due to disease. Knowing that we planned to install a log-burner in the near future, we decided to save some of the wood from this tree and identified this central arch as a potentially suitable storage space. We asked [redacted] if we could use it for log storage, and she immediately agreed unconditionally, which was kind of her. By means of a thank-you, we gifted her the bench that was in there at that stage, moving it to her garden
   e. After we read this claim on AVA/2026/0061 I messaged the previous owner of our house [redacted] to ask if he ever saw [redacted] sitting on the bench which had belonged to him.
      By response, [redacted] wrote *"... The bench was mine put there with her [redacted] permission, she never sat on it, and to the best of my knowledge never crossed the garden (my land) to gain access and sit under the arch area."*
   f. [redacted] further stated *"For example, I can confirm that no one ever sat on the bench. It was not a very pleasant place!"*
   g. As [redacted] lived at [redacted] from 1987 - 2016, and my family and I from 2016 - present, we therefore collectively have no evidence whatsoever that [redacted] ever used or even accessed this space whatsoever, during the span of her 1993-2025 tenure.

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h. As a previous owner and full-time resident living directly opposite this area, and immediately adjacent to a garden area belonging to him since 1991, [redacted] would have far better recollections of the usage of this bench and this arch, than an occasional visitor such as [redacted] or an exceptionally rare visitor [redacted] such as James Hollis.

i. As the current owner and full-time resident living directly opposite this area, and immediately adjacent to a garden area belonging to me, I would have far better recollections of the usage of this bench and this arch, than an occasional visitor such as [redacted] or an exceptionally rare visitor (prior to [redacted] death) such as James Hollis.

j. [redacted], who lived at Tudor Lodge from 1993-2025, does not state in his witness statement that he used, or saw to be used, the central arch for seating or informal gathering purposes, or indeed any purposes, 'recreational' or otherwise, nor does he state that they crossed my (previously [redacted]) elliptical land.

k. [redacted] the gardner, does not state in his witness statement that he used, or saw to be used, the central arch for seating or informal gathering purposes, or indeed any purposes, 'recreational' or otherwise, nor does he state that they crossed my (previously [redacted] elliptical land.

l. Therefore there is no precedent of usage of this arch as a seating or informal gathering space prior to 2019, and it was of course impossible to use the space this way between 2019 and 2025 as it was full of logs belonging to [redacted]. Usage cannot therefore be claimed to be uninterrupted.

2. **Claim that the applicant has a right of way across the elliptical land. (as is claimed in an architect's plan of the site submitted by the Applicant)**

   a. It is written in our property deeds, was explained at the point of purchase, and has been acted upon in practice, that the owners of Tudor Lodge do not have a general right of way over the elliptical land for general residential purposes. A right of way is reserved solely for the maintenance, upkeep and repair of the wall constituting the northern boundary of the elliptical land, as conveyed in the 1991 Deed of gift. At no time during my time in [redacted] did I ever observe [redacted] or anybody acting on their behalf enter onto the elliptical land. I am alarmed and distressed that this right is falsely claimed.

   b. It is extremely relevant to this claim that my wife and I are currently undertaking legal action against the applicant Mr Hollis, [redacted] in relation to multiple trespasses by agents acting for executors and trustees of Tudor Lodge onto this land in the period between May and December 2025, despite multiple letters from ourselves and our Solicitor asking for this activity to cease. The claim reference at Derby Crown Court is N00DE121.

   c. [redacted] was elderly whenever we knew her. In our earlier years at [redacted] when she was more mobile, she would sit on the raised patio around the cottage of Tudor Lodge and we would often see her and wave or pause for a chat when entering or leaving our home. There is no other way to

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leave our property other than past Tudor Lodge, and we would see her frequently. The shape and overhanging eaves of Tudor Lodge meant that there were many seating options in both sun and shade close to her home. [redacted] therefore had plenty of seating options at her disposal around the cottage and in her large and spacious gardens, and it would have been very unusual for her to leave that space, to come and sit in a small damp arch to directly overlook our house and our elliptical heather garden. Therefore, there would have been no call for her to use this land or to attempt to establish a right of way.

d. At no time since 2016 was any attempt or approach made by [redacted] to establish a general right of way or to broaden the limitations of access across this land as reserved in the Deed of Gift dating from 1991.
e. No repairs, maintenance or upkeep of the northern boundary of the land of my elliptical garden area has taken place during my tenure of [redacted] by anybody from Tudor Lodge or acting on their behalf.

3. Claim that the roof of the arched outbuilding is a "seating area".

a. It is stated in submitted plans that the roof of the arches is used as a "rooftop seating area". Again, living directly opposite these arches since 2016 and having done so throughout long periods of 'working from home' during the Covid 19 pandemic, and since, I can categorically state that I have never witnessed [redacted] or indeed anybody else for that matter using the roof of the arches in this way. I have never witnessed either of them on the roof of the arched building at all.
b. I can substantiate this by stating that there is no way onto the lower roof without scrambling, which [redacted] would not have been able to do, and there was no way from the lower to the higher roof of the arches without the use of a ladder prior to the installation of the maintenance steps in 2023.
c. I note that the submitted plan view of the roof does not indicate the significant change in level between lower and upper roofs.
d. The roof is an unfenced area with unprotected edges and is around 5.2m above ground level with nothing to prevent a fall.
e. A small maintenance access staircase was added during roof repairs around May 2023 (less than three years ago) to allow for maintenance access between the lower and upper of the roof arches. Even after the installation of these stairs, access to the lower arch roof still requires scrambling up stones from a garden border, or by ladder from ground level, and no formalised general access route exists.
f. Being almost 90 years of age by this time [redacted] of course never accessed the roof or used these newly-constructed stairs. We show images to show that these stairs were not present prior to 2023 in our central rebuttal document. It is therefore inconceivable that [redacted] or indeed anybody else for that matter used the roof of the arches as a seating area. This therefore cannot be claimed in any way whatsoever.
g. There was, and remains, no edging to the roof, so it would have constituted a very unsafe place to sit or to otherwise use recreationally or residentially. [redacted]

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[redacted] in particular was very concerned for [redacted] safety and would not have permitted him to be in such a dangerous position.

h. Sharing a party roof of this structure with my own property, with no delineated boundaries, I would have observed any garden furniture or other evidence of usage of this area for seating from my own property. At no time have I ever witnessed any garden furniture or any other indication of usage of the rooftop of the arches from anywhere on my property and it is not possible that this could have happened without me noticing it.

i. I witnessed that the repairs carried out to the roof in 2023 included the installation of a rubber waterproofing sheet, weighted and protected from UV with large gravel. It would be completely unsuitable to use this surface as a seating area due to the risk of perforating this rubber sheet due to point loads from the feet of any garden furniture.

j. Neither [redacted] nor the gardener [redacted] state in their witness statements that they used, or saw to be used, the roof of the arches for seating or leisure purposes.

k. The plan showing the roof of the arches neglects to show a large change in level and inaccurately portrays this to be one continuous area, and it further contends 'Access to roof' by a small arrow which neglects to show that there is no formalised access route to the roof without scrambling up stone walls or by ladder.

l. The main, upper roof area of the stone arched building lies directly opposite and overlooks from slightly above, my property's
   i. main bathroom window,
   ii. a downstairs study/ bedroom,
   iii. a glass door into a dining area,
   iv. my hallway
   v. my stairs
   vi. my first-floor landing,
   vii. my son's bedroom,
   viii. my entrance porch
   ix. A first-floor bedroom window in an imminent first-floor extension over the existing downstairs study/ bedroom, for which planning permission has been granted (AVA/2025/0813).

Direct overlooking of these windows from the rooftop would be from distances of between as little as 12.5m to 18m, which are well below the 21m separation distance required by planners.

These windows feature clear, unobscured glass, and are all directly within the line of sight of the rooftop. Any use of the roof of the arch for leisure purposes would have created unacceptable overlooking of private areas of our house which we would not have tolerated and would have been forced to deal with accordingly. There is no record of us having mentioned or complained about this activity simply because it never happened.

4. **Claim that there is a general access route up from the lower garden of Tudor Lodge to the "rooftop seating area".**

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a. **I note that access to the rooftop area is limited as is described in various subsections of Section 3 above.**
b. There is no safe pedestrian route to the upper arch level from ground level, or from the gardens of Tudor Lodge (where it is erroneously marked 'Access to Rooftop' in the architect's drawings), other than by scrambling up some stones in a corner of a garden border. These stones were obscured by branches of a large fig tree which [redacted] cherished and which was cut back by Mr James Hollis in May 2025, after [redacted] death.
c. It would certainly not be possible, for example, to carry a chair or a tray of drinks up onto the roof via this route.
d. There is no formalised pathway, no steps and no handrail on this route to the garage roof; it is an adventurous scramble up large and uneven stones far larger than ordinary steps, as stated in Section 3 of this statement.

5. Claim that the garage arch is a functioning utility space.

5.1. Use of the Garage arch as a Garage

a. The primary purpose of the "garage/ utility" arch was always as a private garage.
b. When [redacted] was alive, I will state unequivocally that she always referred to the outbuilding as 'the garage', as that was its primary purpose.
c. Between us moving to [redacted] in January 2016 and [redacted] giving up driving in 2022, she owned the same pale-blue BMW 1-Series car.
d. [redacted] always parked this car in the garage outbuilding overnight, and the car always remained in this garage arch whenever it was not in use. This is captured in the background of photos taken on my property.
e. The only occasions on which the car was left parked outside on the driveway was when [redacted] had two journeys to make in quick succession, and only if on the same day.
f. When [redacted] was out in the car, the garage door would frequently be left open so that she could drive straight back into the garage arch upon her return.
g. [redacted] usual route 'out' was to reverse out of the garage and reverse all the way down the gravelled driveway to turn in her turning-circle, (which has subsequently been fenced off by James Hollis on 15th December 2025).
h. When arriving back at the garage she would always drive into the garage in a forwards direction with the car boot at the open garage door end.
i. I can be certain about the end-date o[redacted] use of the car as we helped to sell it for her when she was no longer able to drive.
j. In two separate text messages to me, [redacted] herself refers to the space as a garage -
    i. 12/02/2025, *"Just wonder if you know where the water meter is, I need to take a reading [redacted] seems to think it in garage"*
    ii. 18/06/2025 *"...a friend..., Is picking up the freezer from in the garage as hers has just broken down"*

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5.2 Use of the garage arch as a Utility space

k. It is asserted that the arch remains a functional Utility space which I dispute on the basis that a Utility space requires a foulwater drain, which I know not to be present anywhere in the arched building.

l. Upon purchasing [redacted] (and forming a good relationship with our Vendors [redacted] related to my wife and myself an anecdote about when [redacted] briefly trialled the installation of a washing machine in the garage arch on a bygone occasion, which we now know to be in the year 2012. We were told that a representative from the Environment Agency appeared on site shortly afterwards, investigating a watercourse pollution complaint from a nearby property (which we now know to be [redacted] The occupant of [redacted], noted that the freshwater stream running through his property would periodically turn soapy and foam up, contaminating drinking water for sheep and water retained for watering vegetables, which had genuinely upset the owner, and prompted an EA investigation. The washing machine was found to be the culprit for the contamination, and we were informed by [redacted] that the washing machine was formally mandated to be moved back inside the residence of Tudor Lodge to be connected to a proper foulwater drain. Therefore, claims made in the Witness statement of [redacted] that the garage was used as the 'only' washing space available to Tudor Lodge are entirely false.

m. I am informed that the Environment Agency specifically required that plumbing in the garage area be removed within a week to prevent re-installation of the washing machine at a future date, as per the Witness Statement of [redacted]

n. I am in a position to unequivocally dismantle the claim that no washing facilities existed within Tudor Lodge and *'still isn't'*, as claimed by [redacted] I personally remember seeing the washing machine within the kitchen area of the residence of Tudor Lodge during many visits to the property. This was located under the draining board to the left of the kitchen sink. I noticed this during many visits to Tudor Lodge over the years. However, I do have a very specific memory which further cements this. In October 2023 [redacted] informed me that she had a leaking kitchen tap. This being well within my capabilities to repair, I said that I would take a look for her and diagnosed a failed quarter-turn ceramic tap gland. I specifically noted the washing machine because, having seen its location, I contemplated whether we would have to lift the machine out to access the stop-tap, although thankfully this turned out not to be the case. I repaired the kitchen tap temporarily on the first visit with a tap-gland from my stock of plumbing parts, but I ordered a new one and returned a few days later to fit the brand-new version. My purchase records indicate that this was ordered on 7th October 2023.

o. Whilst a tumble-dryer may be present within the garage, (a tumble-dryer not requiring a drain, of course), we have no evidence as to the date when this was installed. Furthermore this was infrequently used because of the unreliability of the electrical system within the arch and the fact that the

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tumble-dryer would frequently trip the electrical fuse, on one memorable occasion around 2021, leading to the freezer defrosting, and all its contents having to be discarded.

p. In fact, [redacted] preferred to line-dry clothes and would frequently dry clothes on a clothesline over Tudor Lodge's herb garden (visible from the right of way to and from [redacted] and would primarily have clothes drying at this location.

q. After the incident where the freezer was defrosted, with food being wasted, [redacted] ceased using the tumble dryer, fearing a repeat incident. I have no recollections of [redacted] using the tumble dryer at all in recent years, since around 2021 or 2022. I do however remember seeing that the washing line was frequently used instead, in all weathers.

r. I believe that in her latter years [redacted] also outsourced laundry work due to her advancing years and ill health.

s. There has been no use of appliances within the garage whatsoever since [redacted] died in January 2025.

t. Therefore, any historical use of a Tumble Dryer within the 'garage arch' cannot claim to be uninterrupted.

u. The freezer was removed from the garage arch on 18/6/2025, the date of which I can be certain about as I have a text message from [redacted] confirming this (see above). Therefore there has been an interruption in the period of use as a freezer location.

v. The roof of the arches was in poor condition due to failure of previous repairs, and regularly leaked a significant amount of rainwater into the garage in poor weather. A leak was present directly over the main electrical installation, which I saw to be to the left of the up-and-over garage door, when viewed from the inside. This frequently caused electrical problems and also led to pooling of water on the floor of the garage. I witnessed that attempts had been made to shield the electrical installations with plastic sheeting. This remained the case until the roof was repaired in 2023.

w. As the garage door was often left open when [redacted] car was out, or during gardening activities (thereby offering a direct view into the garage from my property and my Right of Way), I would have observed and heard if there was any washing machine present.

x. In addition to water ingress, I have witnessed the garage floor to usually be damp from underneath during the winter months with large damp patches usually visible, even remote from the leaking areas, meaning that this cannot be considered to be suitable residential accommodation.

y. Such was the degree of water ingress into the arch that wooden items left inside would regularly rot; I helped remove and dispose of a set of white drawers which were completely rotten, and there is a history of placing anything on wooden pallets and on shelves within the garage to keep it off the wet garage floor.

6. **Claim that [redacted] saw the garage arch as being "part of the house"**

a. When [redacted] was alive, I will state unequivocally that she always referred to the outbuilding as 'the garage', as that was its primary purpose.

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b. As stated above [redacted] always used the garage for overnight parking of her car, and as she began to drive less frequently the car would often spend prolonged periods in the garage without going out.
c. Even after the sale of her car in 2022, [redacted] continued to refer to the arch as '*the garage*'.
d. As mentioned above [redacted] also continued to refer to the space as '*the garage*' after [redacted] death.

7. Claim that the Applicant James Hollis is the owner

a. I have observed the Land Registry documents for Tudor Lodge which state that the owner is still recorded as being [redacted] As deceased persons cannot hold Title, ownership passes to the executors of her estate, being [redacted] as per the Probate documents. I note that James Hollis is not an executor of Tudor Lodge and cannot claim to be its owner in title.

8. Claim of continuity of use in the past 10 years

a. Living opposite the arches in question, my wife and I are in a unique position to observe who is using them and for what purpose. I can unequivocally state that in the duration of living at [redacted] being over ten years, I have ON NO OCCASION ever witnessed anybody from Tudor Lodge using the shallow, central archway adjacent to my elliptical land as an informal seating or gathering area. In fact I never witnessed [redacted] in this area on any occasion whatsoever. Therefore the arch cannot be claimed to have been used for this purpose with any continuity, or indeed, at all.
b. In the period from September 2019 until May 2025 it would not have been physically possible for anybody to sit within the arch due to the presence of a large volume of beech logs belonging to my wife and I, stored there with [redacted] express permission. At no time did [redacted] ask us to move them or withdraw her permission. The logs were gradually used up from 2021 onwards, but a large volume remained present until May 2025 when we were asked by [redacted] to remove them, which we did within a few days. Again, this proves that the continuity cannot be claimed, and that claims by the applicant that this usage was Uninterrupted are demonstrably false.
c. Usage of the central arch in the period September 2019 - May 2025 has been for storage only.
d. The logs manifestly did not belong to Tudor Lodge - the beech tree from which they originated was in the garden of [redacted] and furthermore, there is no open-fire or log-burner at Tudor Lodge (I know this from personal experience of visiting on many occasions. There is electrical heating only, including two electric fires and night-storage heaters. Being a thatched property, I specifically recall that [redacted] was extremely cautious regarding fire and would not even have a gas boiler in the house).

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e. The lack of any usage of the roof of the arches whatsoever by either [redacted] or any other visitor to Tudor Lodge for seating or leisure purposes at any time from 2016 to present demonstrates that there is no continuity of use of this area for this purpose.

f. Electrical faults (potentially due to the damp conditions within the garage arch) meant that use of the tumble dryer ceased after an instance of the electrical trip switch causing the freezer to defrost and a large amount of food to be wasted, in or around 2021. I have not observed any use of the tumble dryer since then.

g. I have a text message from [redacted] confirming the removal of the freezer from the garage arch on 18/6/2025 meaning that continuity of use for this purpose cannot be claimed

9. Claim that Tudor Lodge has access across the private tarmacked parking area belonging to [redacted]

a. I note that the applicant claims some sort of rights over a private, tarmacked parking area outside of the curtilage of their own property, on land belonging to [redacted] also known as [redacted] and South of the access route. This is shown in hatched red lines on plans submitted by the applicants. I cannot enter or leave my property without traversing the straight, direct driveway outside [redacted] as is my right, so I pass this tarmacked parking area several times a day. I categorically state that at no time have I ever witnessed any person associated with Tudor Lodge on this land either in person or by parking or otherwise using a vehicle.

b. Throughout my time living in [redacted] I have observed that this parking area is almost always occupied by vehicles belonging to [redacted] Specifically, a black Renault Clio has used this parking area almost continuously since I have lived here, and I frequently observe that a red Audi, a grey VW Passat and a blue Ford Fiesta all belonging to [redacted] use this as their primary parking area.

c. On 15th October 2025, my wife and I spent several hours with [redacted]

d. During our conversation, [redacted] explained that he had been a Greengrocer in Belper for many years, and he had owned a large vehicle (a Bedford O-Series truck) associated with his business, which he used to collect produce from wholesalers and also from which to sell fruits and vegetables in the outlying villages around Belper.

e. [redacted] stated that, as manoeuvring and parking this large vehicle was difficult at [redacted], he had organised for the aforementioned tarmacked parking area to be constructed on his lower garden area to provide parking for the truck, and that it was then used in this fashion.

f. If this parking area was constructed at some stage in the period 1971-2009, which I hold to be true, then it cannot have existed during the 1948 deed granting access for Tudor Lodge towards Belper Lane, which was later to become known as Lodge Drive. Indeed, the parking area is not shown in either the 1965 or 1972 Ordnance Survey excerpts shown in the Planning

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Statement. Therefore there can be no assertion that Tudor Lodge has a right of way or any other privileges over this tarmacked parking area.

10. Claim that the entire arched outbuilding is in the curtilage of, and belongs to Tudor Lodge

a. I note that it is incorrectly claimed in Sections 4.5 and 4.6 of the Planning Statement that outbuildings (the arched buildings) originally associated with the original 1792 [redacted] have been "subsumed into the curtilage of Tudor Lodge and remain so to this date". The only evidence submitted in support of this are two Ordnance Survey maps dated 1965 and 1972. Ordnance survey maps do not indicate ownership. The westernmost arches of the outbuildings belong to [redacted] as follows:

   i. An open-fronted arch perpendicular to the main run of the buildings has been part of the curtilage of [redacted] since the construction of [redacted] in 1965. This is indicated in the Land Registry (DY156746) and I keep my classic car and caravan in this open fronted arch.

   ii. The Westernmost arch of the main run of buildings is part of [redacted] property since the deed of gift dated 1993 (and prior to the purchase of Tudor Lodge by [redacted] from [redacted] then of [redacted] I keep my lawnmower, garden tools, DIY equipment, my family's bicycles and other items in storage in this arch and have done since purchasing the property in 2016. [redacted] ownership of this area is also indicated in the Land Registry for my property (DY156746). I utterly refute and can demonstrate that this is not owned by Tudor Lodge and is absolutely owned by [redacted]

11. Claim that James Hollis was a frequent visitor to Tudor Lodge

a. I dispute that Mr Hollis was a regular visitor to Tudor Lodge. As mentioned, the only way in or out of my property is to traverse my right of way over Tudor Lodge land, passing by the principal door and parking areas of this property. Knowing that [redacted] and her son were vulnerable, we always kept an eye out for them and we would routinely stop to converse. We would routinely see the late [redacted] and latterly [redacted] and other visitors who we came to know, or at least be able to identify, over many years. Never once did we observe Mr James Hollis at Tudor Lodge in the nine years between us moving in, and [redacted] death in 2025.

b. The one occasion when we did see Mr Hollis prior to [redacted] death was at the Bluebell pub, Farnah Green, Belper, on the occasion of [redacted] 50th Birthday party in 2017/2018, although I did not observe Mr Hollis at Tudor Lodge itself.

c. After having been introduced to Mr James Hollis for the first time at this 50th Birthday event, I would of course have recognised him if I had even seen him subsequently at Tudor Lodge, and I state that I categorically never saw Mr James Hollis at Tudor Lodge or anywhere between this one event and until after the death of [redacted]

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d. The witness statement provided by Mr James Hollis cannot therefore be considered either accurate or reliable.

12. Claim that although the site is located within the Derwent Valley Mills World Heritage Site it does not feature any other designations

a. The building also is listed as a Locally Listed Asset in The Belper History and Character Assessment 2016.
b. It is frequently included in history walks around Belper organised by the Derwent Valley Mills World Heritage Zone team whereby walking tours are brought to see these assets as part of the setting of the original Strutts' Bridgehill House complex.
c. The building is a non-designated Heritage Asset which was recently considered for Listing by Historic England.

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed,

[redacted] 3/3/'26.

[redacted]