

- We have heard impressive representations from several local residents and those contained much of what WACAG wished to present to the Inquiry so I will not repeat it. However, there are a few other issues we think merit attention so we would like to raise some now.
- By their own admission none of the authors of the RPS proofs knew the site prior to May 2017 so they cannot possibly be fully aware of the changes that have taken place since the transfer of ownership in 2016. In their proofs they claim that the baseline position for their studies and projections is that **following** the tree removal. We maintain that the realistic and proper baseline position must be that which existed in 2016 or earlier, i.e. before any trees were illegally felled by the appellant. Moving that baseline to mid-2017 and beyond means that the site and the surroundings are being appraised **after** substantial works and alterations had taken place, **but** those works could not have happened without the prior removal of the trees. Although the appellant paid a relatively small fine for his criminal actions, should the development be allowed then it can only be concluded that he will have benefited enormously from those criminal actions. That is not natural justice in our opinion.
- We suggest that even now the authors have failed to properly assess the situation faced by local residents. Here are a few examples:
- Mr Copp claims that the site is only **slightly** more visible than before. I suggest that a comparison of the photos on p97 of our SoC does not support that opinion. In the 2010 image we can make out only 7 caravans, wholly or partly visible. If the concrete slabs in the 2020 photo are all occupied we will be able to see about 20 lodges from that viewpoint and all of them considerably larger than the 2010 caravans. We would not regard that as a **slight** difference.
- Further to that, Mr Wilson claims that he has established that the lower part of area A is not visible from houses on Hindersitch Lane, below The Green. I live in one of those houses and I can assure him that from the ground floor windows I can see clearly almost all of area A, most of the 27 concrete slabs and at least parts of all the 9 lodges on site now. To help illustrate that please turn to p57 of our SoC and refer to the top image. The open brown area on the left is the former recreational green, towards the top of the slope as we see it. Before the tree clearances I could see only down to about the second row of slabs, just to the right of the solitary lodge on that area. Now I can see most of the 27 slabs as well as the roof of the lowest lodge adjacent to the track from Middle lodge to the Mill House. If lodges are placed on those vacant slabs I estimate that we will probably be able to see all of them. From upstairs I can see the track that goes down to the river bank, indeed some years ago I could see the river itself at the north west end of the site. Tree growth in a garden below my house has obscured that in recent years.
- There are at least two other houses in this part of Hindersitch Lane that have much the same view, as do 8 houses in Middle Lane, just below my house but they were not mentioned at all by Mr Wilson. Middle Lane is also a footpath connecting Main Rd to Hindersitch La.
- In Appendix A p16 para 3.50 of the L & V proof it is claimed that caravans **may** be visible from Top Lane and Shaws Hill. That is difficult to understand because those already on site are clearly visible now from several houses along those roads.
- In para 3.48 and 3.51 of the same proof there is mention of the “existing” 30 static caravans on site in 2017. This is fantasy. In 2017 there were not, and indeed there never were, 30 statics on the site, according to the statutory declarations of former site users.
- Ref p17 para 3.52 of the L & V proof. It is simply not true that trees on the side of the railway line **completely** screen views of the site from the railway and canal towing path. The site is not obscured along a considerable stretch near the sewage works and station master’s house, directly opposite the park.

- In the L & V proof p10 para 4.9 the statement that there might be a **very slight** increase in the level of year-round occupancy in winter is truly remarkable because there was **no** permanent occupancy in winter in the past. The presence of 60, or even 35, permanently occupied lodges will result in a huge increase in night lighting. The photo on p100 of our SoC shows the significant increase in light from just 3 lodges when viewed from Whatstandwell, and that is without the proposed street lighting.
- In para 4.11, also on p 10 it is stated that in area B there is less understory shrubs and trees than in less disturbed woodland beyond Haytop Park. That is hardly surprising because it is precisely the result of the removal of trees and understory shrubs by the appellant. Prior to 2017 caravans in that area above the river bank were so obscured by vegetation that we did not even know how many there were.
- One of the residents who spoke earlier mentioned the potential effects of establishing a 60 unit residential estate at Haytop Park. To put that into perspective, we would point out that at the last census Whatstandwell had about 270 people living in 127 houses. So 60 additional dwellings is a highly significant number. Furthermore, that would suggest that there would be at least 100 people living in them, again a highly significant increase for a small village.
- In his proof Mr Laister discusses on p34 paras 6.84 to 6.93 some economic considerations. Among these he claims that the local economy will benefit from expenditure by the additional residents, but we note that he does not define “local”. There are no shops in Whatstandwell or Alderwasley. Our village shop on Main Road closed back in the 1980s if memory serves. The pub closed more recently and is now the Family Tree tea rooms, which is the only place in either village where one can spend money. The closest shops to Haytop are in Crich but that is about 1.5 miles, mostly uphill and with poor public transport services. In effect what that means is that one has to use a private car to shop, and if one is going to do that then one would go to Alfreton, Ripley, Belper or Matlock for the weekly groceries, for example, because of the greater choice of supermarkets. That is certainly what we and most neighbours do in normal, non-Covid, times.
- He also suggests that there would be some short-term employment opportunities for local labour but in the 4 years since works began we have not heard of anyone from either village having been employed on the site.
- The National Tramway Museum, attracting thousands of visitors a year, is located in Crich, about 1 mile from Whatstandwell station. We also have what is claimed to be the world’s oldest railway tunnel nearby and the second oldest railway workshops 2 miles away, at High Peak Junction. Holloway was the home of the Nightingale family and Florence spent much time there, making that another tourist attraction for some. The canal path between Ambergate and Cromford is very popular with walkers and cyclists all year round. Many visitors arrive by train and walk up and down Hindersitch and Coddington Lane in the course of their visit to the museum. Many others arrive by car or private coach, via the A6 from both north and south, leaving that road at Whatstandwell bridge to drive through Crich to their destination. You have heard from another resident, and I can confirm, that visitors, delivery drivers, etc., now comment about the “eyesore” across the valley, whereas in the past it was common to hear remarks such as “Here you have a view to die for.”. If, as a consequence of the establishment of a suburban housing estate at Haytop, some of those tourist visitors do not come again or deter others by reporting that the area has been spoilt then the local economy will actually suffer economic disbenefits. Should UNESCO decide that the effects on the WHS merit a de-listing then there could be even more economic damage because of more tourists staying away.

- Such factors would have featured in an analysis had an economic rate of return for this project been made available to us. I am not an economist but I do have many years' experience in all aspects of the Project Cycle and I have no doubt that the financial rate of return analysis would be very favourable, especially when current interest rates for borrowing are so low and likely to remain so. The following crude indication, based on estimates, might give some idea about the likely FRR outcome. The local Press reported when CWPH took over the park that the intention was to spend £750,000 modernising and developing it, in addition to the £1.5m purchase cost. So, let's say that the capital outlay has been about £2.25m. Lodges have been advertised for sale at prices starting from £200,000 to £239,000, so an average of about £230,000. The income stream will consist of commission of, say, 10%, on the sale of 60 lodges at £230,000 each, annual pitch fees charged to owners of, say, £3000 each, plus income from services such as electricity, bottled gas, etc., which must be purchased from the site owner. That suggests a return of £1.38m from sales commission plus an annual income of £180,000 from rents. The owner's staffing and running costs are not likely to exceed £50,000 p.a. so a very basic cash flow projection would indicate that by year 7 the investment costs would be recovered and an income of at least £130,000 p.a. would continue into the future. We submit that that is not a bad result for the payment of an £8500 fine.

Thank you.