I PAUL SMITH of 12 Samuel Road, Gawber, Barnsley, DO **SOLEMNLY AND SINCERELY DECLARE** as follows:

1. I was born on 4 November 1968 and lived at Royston Springs from the time my parents bought the site in 1990 until I moved out in 1992. Since 1992 I have visited my parents on a regular basis at Royston Springs. When I moved out in 1992 I was a welder working on sites around Barnsley so I often used to visit my family during the day.

2. My father began work for HPW in early 1986. HPW trained unemployed people. Initially he was based at an office on Eldon Street in Barnsley and then moved to Old Monk Bretton Engineering Training Centre of the Coal Board, which HPW took over. After that they moved to Chesham Road in Barnsley.

3. My father was in charge of all of the staff at HPW and he was responsible for managing the staff and setting targets etc. His work also involved developing projects which would help people to learn new skills for jobs. The horticultural project was just one of the projects which my father was in charge of. For example he also set up a project to repair electrical goods and other projects included running nurseries for pre-school learners, social care for old people in their homes as well as painting and decorating for the elderly. They even did some building work such as building changing rooms at Crane Moor. HPW employed other managers and people who were experts in their particular trades. Therefore, my father spent a lot of time between different projects and managing a lot of different activity.

4. Whilst my father was a director of HPW he also set up Springvale Trust, which was a garden project in Penistone. In 1990 my parents found the site at Royston Springs. The site appealed to my parents because they could build the bungalow for the family to live in and it had a greenhouse which could be used for more training by HPW and Springvale.

5. After purchasing Royston Springs the site began to be used by HPW and Springvale for horticultural training. The people from Springvale started using the site even before the bungalow was built. People who needed training would come from Penistone, which was their main base, to Royston Springs. The numbers would vary each day, ranging from 5 to maybe 15 or 20 people at a time. As the numbers varied they did not appear to work to a tight schedule. People either came on the mini bus or they would walk down the lane after getting off the local bus. They would start arriving at about 9am and would stay for 4 to 6 hours to do some work in the greenhouse.

6. The training in the greenhouse included learning many things such as how to work as a team, how to pot up plants, how to transplant seedlings, how to sort pots into quantities etc. They would leave at different times and were usually collected by the mini bus.

7. HPW and Springvale only used the greenhouse at Royston, although a few cars parked near the greenhouse and delivery vans would visit and the trainers would load and unload them. The mini bus would also be used

to travel to and from Royston and the van would be used to get sandwiches from the village for lunch and breaks.

8. The manager from Springvale was responsible for the workers and the trainees and he also decided they type of plants that would be grown. This would vary depending on the time of year but they were mainly bedding plants for garden borders. This would change to things that flowered late in the year and at Christmas. I recall that at times one of the trainees would act as a Trainee Forman. They would keep big plants over the winter and take cuttings for the next year.

9. As part of his work, my father would meet regularly with the manager from Springvale and talk about what was happening and how people were progressing and how their attendance had been. I confirm that no one in my family was ever involved in the work in the greenhouse and no one was paid any money from the work that took place by Springvale or HPW on the site. All the stock and materials for the horticulture were provided by Springvale and they used the site independently of us living in the bungalow.

10. The same activity continued by Springvale every year from 1990 until 1999 and I confirm that during this time no other organisation was ever involved with the use of the site. The training stopped in 1999 because there were no job vacancies in horticulture. Unemployment in the area became very low and first Springvale closed and then HPW closed in about 2004.

11. Since the closure of HPW and Springvale my parents have continued to live in the house on the site and the greenhouse has remained empty, apart from being used for storage of a few household appliances. The greenhouse also has lots of plastic pots in which have not been used for over ten years and which are deteriorating due to the sun. The plastic bubble on the glass of the greenhouse is also deteriorating.

I MAKE THIS SOLEMN DECLARATION consciously believing the same to be true by virtue of the Statutory Declarations Act 1835.

[redacted]