

## STATEMENT OF TRYSTAN WILLIAMS

I, TRYSTAN WILLIAMS, of [REDACTED] will state as follows:

1. I am the son of Williams Parry Williams, who served as the Headteacher of Ysgol Treborth (Treborth Hall) from 1973 to 1995. I was raised on the school grounds throughout this period, living there continuously from 1973 until 1990, and then during university holidays until 1995 while I attended university in Cardiff.
2. I write this statement in strong support of the residents residing in the immediate vicinity of Treborth Hall and the wider local community who are currently hampered in their daily activities due to issues of access surrounding the roadway linking Treborth Hall, the independent houses, and other local communities.
3. Having grown up on the school grounds, I have intimate, first-hand knowledge of the access arrangements, community use, and established practices regarding the roadway in question. The thoroughfare through the grounds has been used by the public without obstruction for decades and forms an integral part of local community life.
4. During my father's tenure as Headteacher, he actively encouraged community integration with the school. He firmly believed that the school, despite being a special educational needs facility for vulnerable children, should maintain positive relationships with the local community. This philosophy was a cornerstone of the school's ethos and contributed significantly to the positive development of the pupils.
5. The roadway in question served as an important thoroughfare linking Treborth Road (the A487) to the University's Botanical Gardens and has been used by the public continuously since at least the early 1970s, and based on the testimonies of others, for many decades before that.
6. Throughout my childhood and youth (1973-1995), I personally witnessed the daily use of this roadway by:
  - Penrhos Football Club (various age groups from mini to first team)
  - Menai Bridge Rugby Club (all age groups)
  - Local residents walking to and from Treborth
  - Families accessing the Botanical Gardens
  - School groups from local primary and secondary schools on educational visits
  - Members of the community collecting firewood from the school
  - Riding for the Disabled Association (RDA) participants and volunteers
  - Gateway Club members
  - Local walkers and dog walkers
  - Parents with prams and pushchairs
  - Various community support groups
7. This constant flow of community members through the grounds created a positive atmosphere of mutual respect. The children at the school, who had emotional and behavioural difficulties, benefited immensely from these normalised community interactions. Far from being detrimental to the school, this access arrangement was considered beneficial to the pupils' social development and understanding of community. My father specifically structured the school's

approach to include community interaction as a therapeutic element for the pupils, recognising that isolation could worsen their social and emotional challenges.

8. My father specifically installed clear signage to facilitate this public access. There were green signs with white lettering that directed visitors either to the main school entrance or to the thoroughfare which ran in a different direction, away from the main manor house and residential houses. This purposeful signposting demonstrated the school's official accommodation of public access.
9. I can confirm that during my father's 22-year tenure as Headteacher, and throughout my time living on the grounds, there were never any permanent gates obstructing the roadway between Treborth Road and the Botanical Gardens. The only occasions when temporary measures were put in place was during specific school activities on the front lawn, and these were promptly removed afterward. These temporary measures were understood by all to be exceptional and short-term.
10. It is my understanding that the roadway has been in continuous use by the public without substantial interruption for well over 20 years, which would satisfy the criteria for establishment of a public right of way by prescription.
11. The Riding for the Disabled Association (RDA) facility at Treborth was not merely a recreational amenity but a transformative service that profoundly improved the lives of countless families across North Wales. From 1981 until 2018, as confirmed in Rachel Mary Axford's statement, this nationally recognised facility provided essential therapeutic support to children and adults with physical and learning disabilities.
12. I personally witnessed how the RDA activities built confidence, improved physical abilities, and provided joy to participants who often had limited access to outdoor activities. The unrestricted access along the roadway was crucial to this operation, allowing specially adapted vehicles, horse trailers, and support workers to reach the facility safely. Many participants had severe mobility challenges, making the direct route essential rather than a convenience.
13. The Gateway Club, which regularly used the school facilities as mentioned in Sion Jones' statement, provided vital respite care for families with special needs children and adults. This evening club offered structured social activities in the school's dinner hall and gymnasium, creating a safe space for participants while giving family caregivers essential respite time – often their only break in an otherwise constant caregiving schedule.
14. My father actively encouraged this use, understanding that community integration benefited both the club members and the school pupils, who learned valuable lessons about inclusion and community service. The Gateway Club's ability to use the direct access route was essential to its operation, particularly for members with mobility issues or who required specialised transport.
15. The thoroughfare's connection to the Botanical Gardens supported extraordinary educational opportunities for local children. I personally participated in educational walks from both my primary and secondary schools to the gardens via this route. For many children from economically disadvantaged backgrounds in Bangor and surrounding areas, these trips provided their first meaningful connection with nature and science education outside a classroom.

16. The direct pedestrian access was particularly valuable for schools without transport budgets and for children from families experiencing poverty who could not afford field trip costs but could manage a walking trip. The proximity of several schools to this route meant children with special educational needs could access the sensory experiences of the gardens – experiences that were otherwise unavailable to them due to transport limitations.
17. I have reviewed the statements of Andreas Huws, Tudur Anwyl Williams, Sion Owain Jones, and Rachel Mary Axford, and can confirm that their recollections align with my own experiences of the access arrangements at Treborth Hall during the relevant periods.
18. I understand from these statements that gates began to appear around 2015-2018, after the Defendants purchased Treborth Hall. This represents a significant departure from the established practice of open access that had existed for decades previously.
19. The installation of locked gates with chains and warnings about guard dogs, as described by Andreas Huws, creates an unnecessarily antagonistic atmosphere that is detrimental to community relations. This stands in stark contrast to the philosophy of community integration that was fostered during my father's headship.
20. My father believed strongly that access to the natural environment and historic parkland of the Davies family estate (the original owners of Treborth) was beneficial for all local residents. The promotion of community contact was deliberately integrated into the school's vision and educational philosophy.
21. The current obstruction of this well-established access route has significant negative implications for the local community, particularly for vulnerable populations:
  - Residents of Ty'r Ysgol must now navigate multiple locked gates
  - The route floods at the gate locations during inclement weather
  - The historically open access to the Botanical Gardens from Treborth Road is severed
  - Children from economically disadvantaged backgrounds can no longer walk to the gardens
  - Disabled individuals who previously used this route now face significant detours
  - Schools are forced to use expensive transport or cancel educational trips altogether
  - Essential community services like the RDA have been disrupted or displaced
  - The harmonious relationship between the property and the local community is damaged
  - Local children are deprived of environmental education opportunities
  - Families with special needs children have lost accessible recreational spaces
22. The impact extends beyond mere convenience. For families with disabled members, the closure represents the loss of one of the few accessible nature routes in the area. For schools in economically deprived areas of Bangor, it means children no longer experience the educational benefits of the gardens. The

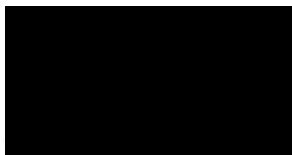
financial burden of arranging alternative transportation is prohibitive for many local schools already operating on restricted budgets.

23. The community cohesion that was fostered through this access point created mutual respect between property residents and the public. During my years living on site, I observed that this openness actually reduced vandalism and trespassing issues, as the community felt a sense of shared ownership and responsibility for the space. The current hostile approach with locked gates and guard dog warnings creates division rather than cooperation.
24. Throughout the documented history of the school since 1950, and certainly throughout my lifetime and my father's headship, the principle of public access through the grounds was respected and maintained. The current restrictions represent an unprecedented departure from this long-standing tradition that has served the community's most vulnerable members for generations.

### **Statement of Truth**

I believe that the facts stated in this Statement of Truth 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:

A black rectangular box redacting the signature.

Trystan Parry Williams

Date: 29.04.2025