

15/11/2018
09:12:42
5904
DTE05570

WARWICKSHIRE POLICE RESTRICTED

PAGE 1
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Incident Report / WK-20160923-0341 / WK-2016-0116071

23/09/2016 16:59:20 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / INFOS/CLOSE Beat:-N51NUN N+B
Priority:(3) PRIORITY Source:TEL RIAN51L (436740,290233)
Disposal Codes (1-6):-AS23.1/ / / / /
Operator No:-5377 Scenario:-WARKS
Dispatcher No:-5976
Handling Unit:-NC50
Creator Wkst:-13
Owner Wkst:-31
Officer in case:-0940

----- Address Information -----

Approx Location
9999 DONNITHORNE AVE, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:
Address:-/.

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

----- Date/Time Info. -----

INITIAL INPUT	23/09/2016	16:59:20
HELD	23/09/2016	16:59:29
UNACTIONED	23/09/2016	17:02:54
ASSIGNED		
DISPATCHED	23/09/2016	18:25:07
AT SCENE	23/09/2016	19:06:55
CLEARED	25/09/2016	18:41:33
RESULTED		
DISPOSED	25/09/2016	19:48:00

----- Comments -----

INFORMANT IS REPORTING TRAVELLERS THAT HAVE	23/09/2016 17:00:24	5377	13	REMARKS
TURNED UP AFTER 9AM TODAY				
*	23/09/2016 17:00:25	5377	13	REMARKS
THERE ARE 6-8 CARAVANS	23/09/2016 17:00:34	5377	13	REMARKS
*	23/09/2016 17:00:34	5377	13	REMARKS
DIFFICULT TO SEE HOW MANY TRAVELLERS THERE ARE	23/09/2016 17:00:48	5377	13	REMARKS
*	23/09/2016 17:00:49	5377	13	REMARKS
INFORMANT CYCLED THROUGH THE PATCH OF GRASS,	23/09/2016 17:01:45	5377	13	REMARKS
THE TRAVELLERS DOGS WERE OFF THE LEAD AND				
CHASED AND BIKED, DID NOT BITE AND WERE NOT				
AGGRESSIVE				
*	23/09/2016 17:01:45	5377	13	REMARKS
THIS HAPPENED 40 MINS AGO	23/09/2016 17:01:52	5377	13	REMARKS
*	23/09/2016 17:01:53	5377	13	REMARKS
INFORMANT IS CONCERNED AS KIDS COME THIS WAY	23/09/2016 17:02:23	5377	13	REMARKS
AS ITS NEXT TO THE SCHOOL				
*	23/09/2016 17:02:23	5377	13	REMARKS
TRAVELLERS WERE NOT CAUSING PROBS	23/09/2016 17:02:37	5377	13	REMARKS
*	23/09/2016 17:02:38	5377	13	REMARKS
THE DOGS WERE JACK RUSSELLS	23/09/2016 17:02:48	5377	13	REMARKS
*	23/09/2016 17:02:51	5377	13	REMARKS
* PRIORITY - NECESSARY TO PREVENT/REDUCE HARM	23/09/2016 17:02:52	5377	13	REMARKS
Transfer To 01NORTHERN From Workstation 13	23/09/2016 17:02:58	5377	13	SYSTEM
Control				
Transfer Accepted At Workstation 50 For Control	23/09/2016 17:03:18	5976	50	SYSTEM
NS64 MOBILISED BY DRAG/DROP	23/09/2016 18:25:07	5976	50	SYSTEM
Arrival time target not met	23/09/2016 18:25:54	SYSTEM	MASTER	REMARKS
NS64 6 - AT SCENE/DEALING WITH INC.	23/09/2016 19:06:55	4853	31	SYSTEM
NS64 2 - AVAILABLE, RESUMING PATROL	23/09/2016 19:06:56	4853	31	SYSTEM
NS64 - SPOKEN TO THE TRAVELLERS AND THEY WILL	23/09/2016 21:10:02	4853	31	REMARKS
POP THEIR DOGS ON LEADS				
FOR ONGOING CHECKS	23/09/2016 21:10:20	4853	31	REMARKS
SNT INFO TAG ADDED	23/09/2016 21:10:24	4853	31	SYSTEM
FOR E/T TO BE AWARE	23/09/2016 21:10:32	4853	31	REMARKS
CALL CARD SUCCESSFULLY DEFERRED 24/09/2016	23/09/2016 21:10:49	4853	31	SYSTEM
06:00:00 Workstation 31				
FOR E/T TO BE AWARE - ONGOING	23/09/2016 21:10:49	4853	31	DEFER
MAY NEED COUNCIL TO BE CALLED RE THIS	23/09/2016 21:11:29	4853	31	REMARKS
TOMORROW... IT WILL BE OUT OF HOURS HOWEVER				
DONT FEEL THE NEED TO CALL TONIGHT.....				
MAYBE THAT THEY MOVE ON AS THERE IS THE HORSE	23/09/2016 21:11:39	4853	31	REMARKS

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15/11/2018
09:12:42
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WARWICKSHIRE POLICE RESTRICTED

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Incident Report / WK-20160923-0341 / WK-2016-0118071

FAIR IN KENILWORTH THIS WEEKEND FOR UNIT TO CEHCK TOMORROW AND IF STILL THERE BY MIDDAY, FOR COUNCIL TO BE ADVISED CAD093: REACTIVATED AT MASTER Transfer Accepted At Workstation 31 For Information Cross Referenced By Incident WK-20160924-0240 CALL CARD SUCCESSFULLY DEFERRED 25/09/2016 06:00:00 Workstation Group 01NORTHERN CAD093: REACTIVATED AT MASTER Transfer Accepted At Workstation 31 For Information CALL CARD SUCCESSFULLY DEFERRED 25/09/2016 16:00:00 Workstation 31 CAD093: REACTIVATED AT MASTER Transfer Accepted At Workstation 31 For Information NC50 MOBILISED BY DRAG/DROP NC50 6 - AT SCENE/DEALING WITH INC. NC50 2 - AVAILABLE, RESUMING PATROL NC50- WE HAVE SPOKEN TO THE TRAVELLERS THEY ARE ALL PITCHED UP AND READY TO LEAVE CAN WE UPDATE COUNCIL AND TELL THEM THEY ARE LEAVING Transfer To 07.INFOS From Workstation 50 Control Transfer Accepted At Workstation 36 For Control Transfer To 07.INFOS From Workstation HQ131 Control Transfer Accepted At Workstation HQ131 For Control INFOS - HAVE READ THIS JOB, CANT SEE THAT THE COUNCIL WERE EVER INFORMED ? Transfer To 01NORTHERN From Workstation HQ131 Control Transfer Accepted At Workstation 31 For Control # Arrests # Cautions # Reports DISPOSAL CODE-: AS23.1 NSIR Qualifiers: OT1.1 WK-20160923-0341 HAS BEEN DISPOSED OR DEFERRED Reason for Print:HH <th>23/09/2016 21:11:50 4853 24/09/2016 06:00:57 SYSTEM 24/09/2016 06:54:04 4580 24/09/2016 15:13:07 4668 24/09/2016 20:30:23 5289 24/09/2016 20:30:23 5289 25/09/2016 06:01:00 SYSTEM 25/09/2016 06:06:40 5381 25/09/2016 07:38:48 4454 25/09/2016 07:38:48 4454 25/09/2016 16:00:30 SYSTEM 25/09/2016 16:28:36 4668 25/09/2016 18:08:53 5320 25/09/2016 18:09:24 5320 25/09/2016 18:36:42 SYSTEM 25/09/2016 18:41:32 4668 25/09/2016 18:42:25 5320 25/09/2016 18:42:26 5320 25/09/2016 18:42:28 5320 25/09/2016 18:42:49 4652 25/09/2016 19:43:32 4347 25/09/2016 19:43:33 4347 25/09/2016 19:45:59 4347 25/09/2016 19:46:03 4347 25/09/2016 19:46:25 4668 25/09/2016 19:47:59 5320 25/09/2016 19:47:59 5320 25/09/2016 19:47:59 5320 25/09/2016 19:47:59 5320 15/11/2018 09:12:42 5904<th>31 MASTER 31 31 50 50 MASTER 31 31 31 50 50 ARLSERVER 31 50 50 36 HQ131 HQ131 HQ131 HQ131 31 50 50 50 50 50 DTE05570<th>REMARKS SYSTEM SYSTEM SYSTEM SYSTEM DEFER SYSTEM SYSTEM SYSTEM DEFER SYSTEM SYSTEM REMARKS SYSTEM SYSTEM SYSTEM REMARKS SYSTEM SYSTEM SYSTEM REMARKS SYSTEM DISPOSE DISPOSE DISPOSE DISPOSE SYSTEM</th></th></th>	23/09/2016 21:11:50 4853 24/09/2016 06:00:57 SYSTEM 24/09/2016 06:54:04 4580 24/09/2016 15:13:07 4668 24/09/2016 20:30:23 5289 24/09/2016 20:30:23 5289 25/09/2016 06:01:00 SYSTEM 25/09/2016 06:06:40 5381 25/09/2016 07:38:48 4454 25/09/2016 07:38:48 4454 25/09/2016 16:00:30 SYSTEM 25/09/2016 16:28:36 4668 25/09/2016 18:08:53 5320 25/09/2016 18:09:24 5320 25/09/2016 18:36:42 SYSTEM 25/09/2016 18:41:32 4668 25/09/2016 18:42:25 5320 25/09/2016 18:42:26 5320 25/09/2016 18:42:28 5320 25/09/2016 18:42:49 4652 25/09/2016 19:43:32 4347 25/09/2016 19:43:33 4347 25/09/2016 19:45:59 4347 25/09/2016 19:46:03 4347 25/09/2016 19:46:25 4668 25/09/2016 19:47:59 5320 25/09/2016 19:47:59 5320 25/09/2016 19:47:59 5320 25/09/2016 19:47:59 5320 15/11/2018 09:12:42 5904 <th>31 MASTER 31 31 50 50 MASTER 31 31 31 50 50 ARLSERVER 31 50 50 36 HQ131 HQ131 HQ131 HQ131 31 50 50 50 50 50 DTE05570<th>REMARKS SYSTEM SYSTEM SYSTEM SYSTEM DEFER SYSTEM SYSTEM SYSTEM DEFER SYSTEM SYSTEM REMARKS SYSTEM SYSTEM SYSTEM REMARKS SYSTEM SYSTEM SYSTEM REMARKS SYSTEM DISPOSE DISPOSE DISPOSE DISPOSE SYSTEM</th></th>	31 MASTER 31 31 50 50 MASTER 31 31 31 50 50 ARLSERVER 31 50 50 36 HQ131 HQ131 HQ131 HQ131 31 50 50 50 50 50 DTE05570 <th>REMARKS SYSTEM SYSTEM SYSTEM SYSTEM DEFER SYSTEM SYSTEM SYSTEM DEFER SYSTEM SYSTEM REMARKS SYSTEM SYSTEM SYSTEM REMARKS SYSTEM SYSTEM SYSTEM REMARKS SYSTEM DISPOSE DISPOSE DISPOSE DISPOSE SYSTEM</th>	REMARKS SYSTEM SYSTEM SYSTEM SYSTEM DEFER SYSTEM SYSTEM SYSTEM DEFER SYSTEM SYSTEM REMARKS SYSTEM SYSTEM SYSTEM REMARKS SYSTEM SYSTEM SYSTEM REMARKS SYSTEM DISPOSE DISPOSE DISPOSE DISPOSE SYSTEM
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--- Relations ---
CALL CARD - XREF CALL

WK-20160924-0240 (N51H) ASSOCIATED BY OPERATOR 4668

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Incident Report / WK-20160926-0316 / WK-2016-0119496

26/09/2016 18:10:51 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING
Priority: (4) SCHEDULED Source: 999
Disposal Codes (1-6): -AD06.1 / / / / /
Operator No: -5115 Scenario: -WARKS
Dispatcher No: -
Handling Unit: -

Beat: -N51NUN N+B
RIAN51L (436987,290432)

Creator Wkst: -49
Owner Wkst: -49
Officer in case: -4406

----- Address Information -----

██████████
DONNITHORNE AVE, NUNEATON, CV114QJ

Proximity: -
[X] Valid Gazetteer: -

----- Complainant Details -----

Surname/First Name: ██████████
Address: -

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity: - , ,
Email: -

----- Date/Time Info. -----

	Date	Time
INITIAL INPUT	26/09/2016	18:10:08
HELD	26/09/2016	18:10:08
UNACTIONED	26/09/2016	18:10:51
ASSIGNED	26/09/2016	18:11:30
DISPATCHED	26/09/2016	18:12:00
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	26/09/2016	18:38:32

----- Comments -----

Text	Date	Time	Source	Remarks
999: ██████████ 436124 ,290631 ,1871 26/09/2016 18:10:53 5115 49	26/09/2016	18:10:53	5115	SYSTEM
,1871, 90 ,0 ,OSGB36, *MOB* 02				
,99,20160926181003,0 ,DATA AVAILABLE ,20341221				
20160926 181008				
INFT WOULD LIKE TO REPORT TRAVELLERS GOING	26/09/2016	18:12:16	5115	REMARKS
DOWN- SAVED LOCATION.				
	26/09/2016	18:12:16	5115	REMARKS
I BELIEVE THEY ARE GOING TO PARK UP BY THE OLD	26/09/2016	18:12:31	5115	REMARKS
PEOPLE'S COMPLEX				
	26/09/2016	18:12:33	5115	REMARKS
Cross Referenced To Incident WK-20160926-0317	26/09/2016	18:12:35	4689	SYSTEM
FURTHER CALL FROM ██████████ TEL ██████████ TO	26/09/2016	18:13:31	5951	REMARKS
SAY THERE ARE 11 CARAVANS AND MORE ON THEIR WAY				
INFT DID NOT GET ANY VRM'S	26/09/2016	18:13:38	5115	REMARKS
	26/09/2016	18:13:39	5115	REMARKS
* SCHEDULED - POLICE ATTENDANCE REQUIRED BUT	26/09/2016	18:13:55	5115	REMARKS
NOT P OR E				
	26/09/2016	18:13:56	5115	REMARKS
Cross Referenced By Incident WK-20160926-0317	26/09/2016	18:23:31	4437	SYSTEM
Cross Referenced To Incident WK-20160926-0317	26/09/2016	18:38:11	4406	SYSTEM
* Arrests * Cautions * Reports	26/09/2016	18:38:31	4406	DISPOSE
DISPOSAL CODE: - AD06.1	26/09/2016	18:38:31	4406	DISPOSE
BRIGN TAG ADDED	26/09/2016	18:38:32	4406	SYSTEM
NSIR Qualifiers: OTL.1	26/09/2016	18:38:32	4406	DISPOSE
WK-20160926-0316 HAS BEEN DISPOSED OR DEFERRED	26/09/2016	18:38:32	4406	DISPOSE
Reason for Print:HH	15/11/2018	09:13:55	5904	SYSTEM

----- Relations -----

CALL CARD - XREF CALL WK-20160926-0317 (N51L) ASSOCIATED BY OPERATOR 4406
CALL CARD - XREF CALL WK-20160926-0317 (N51L) ASSOCIATED BY OPERATOR 4437
MOBILE - ISR RELATION 436124,290631,1871,1871,90,0
999: ██████████ 436124 ,290631 ,1871 ,1871, 90 ,0
,OSGB36, *MOB* 02 ,99,20160926181003,0 ,DATA AVAILA
BLE ,20341221 20160926 181008
SIMILAR CALLS - ISR RELATI WK-20160926-0317 (N51L): Approx Location,9999 DONNITHORNE AVE
WK:TRESPASS/UNAUTHORISED CAMPING:4689

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WARRICKSRIRE POLICE

Incident Report / WK-20160926-0317 / WK-2016-0119497

1781

26/09/2016 18:10:53 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / NS65
Priority: (3) PRIORITY
Disposal Codes (1-6): -AS22.1/ / / / /
Operator No: -4689
Dispatcher No: -5321
Handling Unit: -NS65

Beat: -NS1NUN N+B
RIAN51L (436740,290233)

Creator Wkst: -48
Owner Wkst: -31
Officer in case: -6211

----- Address Information -----

Approx Location
9999 DONNITHORNE AVE, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name: [REDACTED]
Address: [REDACTED]

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity: -, ,
Email:-

----- Date/Time Info. -----

INITIAL INPUT	26/09/2016	18:10:53
HELD	26/09/2016	18:11:00
UNACTIONED	26/09/2016	18:12:32
ASSIGNED		
DISPATCHED	26/09/2016	18:45:57
AT SCENE	26/09/2016	18:53:38
CLEARED	26/09/2016	19:06:01
RESULTED		
DISPOSED	26/09/2016	20:25:19

----- Comments -----

..	26/09/2016 18:11:22 4689	48	REMARKS
THERE ARE APPROX 12 TRAVELLER CARAVANS PULLING ONTO THE GRASS AREA ON DONNITHORNE AVE	26/09/2016 18:11:44 4689	48	REMARKS
..			
Cross Referenced By Incident WK-20160926-0316	26/09/2016 18:11:45 4689	48	REMARKS
Transfer To OlnORTHERN From Workstation 48	26/09/2016 18:12:35 4689	48	SYSTEM
Control	26/09/2016 18:12:47 4689	48	SYSTEM
THIS IS ON THE LAND OPPOSITE INFS HOUSE, NUMBER 107	26/09/2016 18:14:49 4689	48	REMARKS
..			
INF IS VERY IRATE ABOUT THIS, HE FEELS THE COUNCIL ARE REPEATEDLY DOING NOTHING TO PREVENT THEM COMING BACK EACH TIME	26/09/2016 18:14:50 4689	48	REMARKS
..	26/09/2016 18:15:31 4689	48	REMARKS
..			
* PRIORITY - FORCE POLICY FOR THIS CALL TYPE	26/09/2016 18:15:33 4689	48	REMARKS
..	26/09/2016 18:16:36 4689	48	REMARKS
CH- FURTHER CALL FROM [REDACTED] FROM [REDACTED]	26/09/2016 18:16:37 4689	48	REMARKS
[REDACTED] THERE ARE AROUND 12 PULLED UP ON THE GRASSY AREA WHERE THEY WERE LAST NIGHT. THEY ARE JUST SETTING UP NOW	26/09/2016 18:19:47 5933	47	REMARKS
..			
Cross Referenced To Incident WK-20160926-0316	26/09/2016 18:20:37 5933	47	REMARKS
FURTHER CALL FROM [REDACTED]	26/09/2016 18:21:17 5933	47	REMARKS
I PUT A COMPLAINT IN LAST WEEK	26/09/2016 18:23:31 4437	2	SYSTEM
THIS IS HAPPENING EVERY OTHER WEEK	26/09/2016 18:27:07 5115	49	REMARKS
..	26/09/2016 18:27:14 5115	49	REMARKS
10-12 TRAVELLERS	26/09/2016 18:27:18 5115	49	REMARKS
THEY ARE ON THE GRASS AREA	26/09/2016 18:27:21 5115	49	REMARKS
Transfer Accepted At Workstation 31 For Control	26/09/2016 18:27:36 5115	49	REMARKS
Cross Referenced By Incident WK-20160926-0316	26/09/2016 18:28:19 5115	49	REMARKS
CH- I HAVE HAD TWO FURTHER CALLS ON THIS, RESIDENTS ARE FURIOUS, ONE OF MY CALLERS HAS THREATENED TO GO DOWN THERE AND "GET ATTACKED" SO POLICE WILL DO SOMETHING	26/09/2016 18:29:35 5321	31	SYSTEM
Transfer To OlnORTHERN From Workstation 47	26/09/2016 18:38:11 4406	50	SYSTEM
Control	26/09/2016 18:40:24 5933	47	REMARKS
Transfer Accepted At Workstation 31 For Control			
NS65 MOBILISED BY DRAG/DROP	26/09/2016 18:44:04 5321	31	SYSTEM
NS65 - THERE ARE A FEW TRAVELLERS HERE THEY HAVE BEEN GIVEN WORDS OF ADVICE	26/09/2016 18:45:57 5321	31	SYSTEM
AND ALSO ASKED THAT THEY CHAIN ALL THERE DOGS	26/09/2016 18:53:16 5321	31	REMARKS
	26/09/2016 18:53:34 5321	31	REMARKS

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WARRICKSHIRE POLICE

Incident Report / WK-20160926-0317 / WK-2016-0119497

1782

UP AS THERE ARE A LOT OF DOGS RUNNING AROUND

NS65 6 - AT SCENE/DEALING WITH INC.

NS65 2 - AVAILABLE, RESUMING PATROL

FROM NS65; THIS CAN NOW BE CLOSED.

Arrests # Cautions # Reports

DISPOSAL CODE-: AS22.1

NSIR Qualifiers: OT1.1

WK-20160926-0317 HAS BEEN DISPOSED OR DEFERRED

Cross Referenced By Incident WK-20160927-0033

Reason for Print:HH

26/09/2016 18:53:38 4406
26/09/2016 19:06:01 4406
26/09/2016 20:24:41 4406
26/09/2016 20:25:19 4406
26/09/2016 20:25:19 4406
26/09/2016 20:25:19 4406
26/09/2016 20:25:19 4406
27/09/2016 07:34:20 5459
15/11/2018 09:14:44 5904

50
50
50
50
50
50
50
14

SYSTEM
SYSTEM
REMARKS
DISPOSE
DISPOSE
DISPOSE
DISPOSE
SYSTEM
SYSTEM

---- Relations ----

CALL CARD - XREF CALL

CALL CARD - XREF CALL

CALL CARD - XREF CALL

SIMILAR CALLS - ISR RELATI

WK-20160926-0316 (N51L) ASSOCIATED BY OPERATOR 4406
WK-20160927-0033 (N51L) ASSOCIATED BY OPERATOR 5459
WK-20160926-0316 (N51L) ASSOCIATED BY OPERATOR 4437
WK-20160926-0316(N51L):CALDWELL GRANGE, DONNITHORNE AVE
WK-20160926-0316:TRESPASS/UNAUTHORISED CAMPING:4689.

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WARWICKSHIRE POLICE RESTRICTED

Incident Report / WK-20160927-0033 / WK-2016-0119668

1783

27/09/2016 07:34:11 (ANIMAL) ANIMAL**CONSIDER PCSO**
Priority: (4) SCHEDULED SourceTEL
Disposal Codes (1-6):-AS22.1/ / / / /
Operator No:-5459 Scenario:-WARKS
Dispatcher No:-4290
Handling Unit:-NS63

Beat:-N51NUN N+B
RIAN51L (436740,290233)

Creator Wkst:-14
Owner Wkst:-31
Officer in case:-6142

---- Address Information ----

Approx Location
9999 DONNITHORNE AVE, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

---- Complainant Details ----

Surname/First Name:
Address:

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

---- Date/Time Info. ----

INITIAL INPUT	27/09/2016	07:34:11
HELD	27/09/2016	07:34:11
NACTIONED	27/09/2016	07:37:14
ASSIGNED		
DISPATCHED	27/09/2016	11:06:16
AT SCENE	27/09/2016	11:06:17
CLEARED	27/09/2016	11:06:18
RESULTED		
DISPOSED	27/09/2016	11:06:28

---- Comments ----

PREVIOUS CALLS VIEWED 9999 DONNITHORNE AVE	27/09/2016 07:34:01 5459	14	SYSTEM
Created from Shadow Incident	27/09/2016 07:34:11 5459	14	REMARKS
Cross Referenced To Incident WK-20160926-0317	27/09/2016 07:34:19 5459	14	SYSTEM
PREVIOUS CALLS VIEWED 9999 DONNITHORNE AVE	27/09/2016 07:34:22 5459	14	SYSTEM
TRAVELLERS ARE AT THE LOCATION NEAR TO CALDWELL GRANGE	27/09/2016 07:34:46 5459	14	REMARKS
THEY HAVE ABOUT 6-7 DOGS ROAMING FREE IN THE AREA	27/09/2016 07:34:46 5459	14	REMARKS
A CYCLIST HAS JUST GONE PAST AND THE DOGS HAVE GONE FOR THE CYCLISTS FEET	27/09/2016 07:35:05 5459	14	REMARKS
INF IS CONCERNED AS THIS IS A SCHOOL ROUTE AND DOESN'T WANT THE SCHOOL CHILD TO THE POTENTIALLY ATTACKED BY THE DOGS	27/09/2016 07:35:25 5459	14	REMARKS
# SCHEDULED - POLICE ATTENDANCE REQUIRED BUT NOT P OR E	27/09/2016 07:35:26 5459	14	REMARKS
Comments viewed via auto pop-up, Location 9999 DONNITHORNE AVE	27/09/2016 07:36:08 5459	14	REMARKS
Transfer To 01NORTHERN From Workstation 14 Control	27/09/2016 07:36:10 5459	14	REMARKS
Transfer Accepted At Workstation 31 For Control	27/09/2016 07:37:12 5459	14	REMARKS
Comments viewed via auto pop-up, Location 9999 DONNITHORNE AVE	27/09/2016 07:37:13 5459	14	REMARKS
NS63 THERE IS A PUBLIC FOOTPATH THAT LEADS FROM THIS LOCATION	27/09/2016 07:37:14 5459	14	SYSTEM
NS63 NO DOGS AROUND FROM WHAT WE CAN SEE	27/09/2016 07:37:15 5459	14	SYSTEM
THE TRAVELLERS ARE BACK	27/09/2016 07:40:09 4290	31	SYSTEM
WILL BE LIAISING WITH COUNCIL RE THIS CLOSED	27/09/2016 07:40:11 4290	31	SYSTEM
NS63 MOBILISED BY DRAG/DROP	27/09/2016 08:24:23 4290	31	REMARKS
NS63 6 - AT SCENE/DEALING WITH INC.	27/09/2016 08:24:33 4290	31	REMARKS
NS63 2 - AVAILABLE, RESUMING PATROL	27/09/2016 11:05:46 4290	31	REMARKS
# Arrests # Cautions # Reports	27/09/2016 11:05:57 4290	31	REMARKS
DISPOSAL CODE:- AS22.1	27/09/2016 11:06:05 4290	31	REMARKS
	27/09/2016 11:06:06 4290	31	REMARKS
	27/09/2016 11:06:16 4290	31	SYSTEM
	27/09/2016 11:06:17 4290	31	SYSTEM
	27/09/2016 11:06:18 4290	31	SYSTEM
	27/09/2016 11:06:28 4290	31	DISPOSE
	27/09/2016 11:06:28 4290	31	DISPOSE

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15/11/2018
09:15:37
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DTE05570

WARWICKSHIRE POLICE RESTRICTED

1784

Incident Report / WK-20160927-0033 / WK-2016-0119668

NSIR Qualifiers: OT1.1	27/09/2016 11:06:28 4290	31	DISPOSE
WK-20160927-0033 HAS BEEN DISPOSED OR DEFERRED	27/09/2016 11:06:28 4290	31	DISPOSE
Reason for Print:HH	15/11/2018 09:15:37 5904	DTE05570	SYSTEM

---- Relations ----

CALL CARD - XREF CALL

WK-20160926-0317 (N51L) ASSOCIATED BY OPERATOR 5459

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WARWICKSHIRE POLICE RESTRICTED

1785

Incident Report / WK-20160928-0283 / WK-2016-0120384

28/09/2016 16:17:18 (ASB) ANTI SOCIAL BEHAVIOUR
Priority:(4) SCHEDULED SourceCALLER
Disposal Codes (1-6):-AS21.1 / / / / /
Operator No:-4484 Scenario:-WARKS
Dispatcher No:-
Handling Unit:-

Beat:-N51NUN N+B
RIAN51L (436987,290432)

Creator Wkst:-NUN79
Owner Wkst:-NUN79
Officer in case:-4484

----- Address Information -----

██████████
DONNITHORNE AVE, NUNEATON, ██████████

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name: ██████████
Address:-C / O ██████████

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

----- Date/Time Info. -----

INITIAL INPUT	28/09/2016	16:17:18
HELD	28/09/2016	16:17:43
NACTIONED	28/09/2016	16:19:05
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	28/09/2016	16:28:48

----- Comments -----

PREVIOUS CALLS VIEWED ██████████	C / O	28/09/2016 16:18:51	4484	NUN79	SYSTEM
CALLER ██████████ REPORTING THAT AT 0845HRS TODAY		28/09/2016 16:19:58	4484	NUN79	REMARKS
WHILST WALKING ALONG THE ROAD WITH HER BIKE					
SHE WAS CONFRONTED BY THREE TERRIER TYPE DOGS					
AND AN ALSATION ALL SNARLING AT HER.					
THERE WERE TRAVELLERS VANS (6 APPROX) JUST UP		28/09/2016 16:20:25	4484	NUN79	REMARKS
FROM THE DOGS SO SHE ASKED THEM TO CALL THE					
DOGS OFF.					
THEY SAID THEY ARE ONLY PUPPIES BUT EVENTUALLY		28/09/2016 16:20:42	4484	NUN79	REMARKS
CALLED THEM OFF.					
*****		28/09/2016 16:20:43	4484	NUN79	REMARKS
		28/09/2016 16:21:11	4484	NUN79	REMARKS
A MALE LOOKED ABOUT 60 PUT HIS HEAD THROUGH					
ONE OF THE CARAVAN WINDOWS AND SHOUTED ABUSE					
AT HER.					
***		28/09/2016 16:21:13	4484	NUN79	REMARKS
SHE WENT INTO WORK STILL SHAKING.		28/09/2016 16:21:20	4484	NUN79	REMARKS
*****		28/09/2016 16:21:21	4484	NUN79	REMARKS
		28/09/2016 16:21:34	4484	NUN79	REMARKS
SHE DOES NOT WANT HER FAMILY TO KNOW AS THEY					
MAY RETALIATE.		28/09/2016 16:21:45	4640	50	SYSTEM
ASB TAG ADDED		28/09/2016 16:21:45	4640	50	SYSTEM
SNT INFO TAG ADDED		28/09/2016 16:21:45	4640	50	SYSTEM
ENGAGE TAG ADDED		28/09/2016 16:21:58	4640	50	QUESTION
QUESTION SET HAS BEEN EXITED BEFORE					
COMPLETION: TO BE FINISHED LATER					
PREVIOUS CALLS VIEWED DONNITHORNE AVE		28/09/2016 16:22:12	4640	50	SYSTEM
██████████					
HAVING ASKED HER WHEN SHE WOULD LIKE AN APPT		28/09/2016 16:28:07	4484	NUN79	REMARKS
SHE HAS NOW DECIDED SHE DOES NOT WISH TO GET					
INVOLVED AND JUST WANTS OFFICERS AWARE THAT					
DOG ARE LOOSE DOWN THERE AND VERY CLOSE TO					
CARE HOME		28/09/2016 16:28:09	4484	NUN79	REMARKS
SNT ALREADY TAGGED TO PAY PASSING ATTN.		28/09/2016 16:28:25	4484	NUN79	REMARKS
# Arrests # Cautions # Reports		28/09/2016 16:28:48	4484	NUN79	DISPOSE
DISPOSAL CODE:- AS21.1		28/09/2016 16:28:48	4484	NUN79	DISPOSE
NSIR Qualifiers: OT1.1		28/09/2016 16:28:48	4484	NUN79	DISPOSE
WK-20160928-0283 HAS BEEN DISPOSED OR DEFERRED		28/09/2016 16:28:48	4484	NUN79	DISPOSE
ENGAGE TAG REMOVED		29/09/2016 15:21:57	6251	WAR100327	SYSTEM
SNT INFO TAG REMOVED		29/09/2016 15:22:01	6251	WAR100327	SYSTEM
NS64 / NS52 - ATTENDED WITH THE DOG WARDEN		29/09/2016 15:22:40	6251	WAR100327	REMARKS
STRONG WORDS OF ADVICE GIVEN					

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1786

Incident Report / WK-20160928-0283 / WK-2016-0120384

Reason for Print:HH

15/11/2018 09:17:23 5904

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WARWICKSHIRE POLICE RESTRICTED

1787

Incident Report / WK-20160929-0131 / WK-2016-0120704

29/09/2016 10:50:03 (ANIMAL) ANIMAL**CONSIDER PCSO** / PA306
Priority:(3) PRIORITY SourceCALLER
Disposal Codes (1-6):-CR15.1/ / / / /
Operator No:-4484 Scenario:-WARKS
Dispatcher No:-5381
Handling Unit:-PA306

Beat:-N51NUN N+B
RIAN51L (436740,290233)

Creator Wkst:-NUN79
Owner Wkst:-31
Officer in case:-1206

---- Address Information ----

Approx Location
9999 DONNITHORNE AVE, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

---- Complainant Details ----

Surname/First Name:
Address:

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

---- Date/Time Info. ----

INITIAL INPUT	29/09/2016	10:50:03
HELD	29/09/2016	10:50:29
REACTED	29/09/2016	10:52:17
ASSIGNED		
DISPATCHED	29/09/2016	10:56:28
AT SCENE	29/09/2016	11:27:27
CLEARED	29/09/2016	12:33:43
RESULTED		
DISPOSED	29/09/2016	12:36:16

---- Comments ----

PREVIOUS CALLS VIEWED 9999 DONNITHORNE AVE	29/09/2016 10:51:53 4484	NUN79	SYSTEM
Comments viewed via auto pop-up, Location	29/09/2016 10:52:20 4484	NUN79	SYSTEM
Comments 9999 DONNITHORNE AVE	29/09/2016 10:53:00 4484	NUN79	REMARKS
CALLER HAS BEEN BITTEN BY A TERRIER WHILST	29/09/2016 10:53:10 4484	NUN79	REMARKS
WALKING FRIENDS DOG THIS MORNING.	29/09/2016 10:53:12 4484	NUN79	REMARKS
THIS HAPPENED AT 0900HRS.	29/09/2016 10:53:38 4484	NUN79	REMARKS

HE STATES HE HAS ONLY 10 MINS TO SEE AN	29/09/2016 10:53:52 4484	NUN79	REMARKS
OFFICER - SO WOULD APPRECIATE OFFICER ASAP.	29/09/2016 10:53:53 4484	NUN79	REMARKS
MALE GOING ON HOLIDAY TOMORROW SO CANNOT BE	29/09/2016 10:54:28 4484	NUN79	REMARKS
SEEN AFTER TODAY.			

THIS IS THE SECOND INCIDENT I HAVE TAKEN RE			
THE DOGS FROM THE TRAVELLERS VANS...OTHER			
VICTIM DID NOT WANT TO GET INVOLVED AND WAS			
NOT BITTEN - JUST SURROUNDED BY DOGS.			
CNTRL - WHERE IS INF NOW?	29/09/2016 10:54:31 5381	31	REMARKS
Transfer To 01NORTHERN From Workstation NUN79	29/09/2016 10:54:33 4484	NUN79	SYSTEM
Control			
Transfer Accepted At Workstation 31 For Control	29/09/2016 10:54:41 5381	31	SYSTEM
Comments viewed via auto pop-up, Location	29/09/2016 10:54:42 5381	31	SYSTEM
Comments 9999 DONNITHORNE AVE			
SORRY-----WAITING AT FRONT OFFICE	29/09/2016 10:56:00 4484	NUN79	REMARKS
PA306 MOBILISED BY DRAG/DROP	29/09/2016 10:56:28 5381	31	SYSTEM
PA306 6 - AT SCENE/DEALING WITH INC.	29/09/2016 11:27:27 5381	31	SYSTEM
BASIC OFFENCE OUTLINE:	29/09/2016 12:14:49 5381	31	REMARKS
AT MATERIAL DATE TIME AND LOCATION VICTIM WAS			
WALKING HIS FRIEND'S DOG ON A PUBLIC FOOTPATH			
WHEN HE WAS ATTACKED BY 10-12 DOGS WHO WERE			
NOT ON THEIR LEADS.			
VICTIM FELT A SHARP PAIN ON HIS RIGHT LEG AND	29/09/2016 12:14:49 5381	31	REMARKS
WHEN BACK AT HIS FRIEND'S ADDRESS (ON CLOSER			
INSPECTION HE SAW HE HAD BEEN BITTEN. THIS			
HAS CAUSED TWO SMALL RED TEETH MARKS ON HIS			
OUTER RIGHT CALF. HIS CLOTHING WAS NOT RIPPED.	29/09/2016 12:14:49 5381	31	REMARKS
THE VICTIM STATES THAT THE DOGS RAN OUT OF A	29/09/2016 12:14:49 5381	31	REMARKS
TRAVELLERS SITE NEAR TO CALDWELL GRANGE CARE			
HOME. THERE WAS NO OTHER WITNESSES AROUND AND			
NOBODY CAME OUT OF THE SITE TO CONTROL THE			
DOGS. THE VICTIM DESCRIBES THE DOGS AS ALL	29/09/2016 12:14:49 5381	31	REMARKS

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1788

Incident Report / WK-20160929-0131 / WK-2016-0120704

SMALL TERRIOR LIKE DOGS, DIFFERENT BREEDS.
APPROX 10-12 DOGS IN TOTAL. HE COULD NOT BE
SURE WHICH DOG BIT HIM AND WOULD NOT RECOGNISE
THE DOG AGAIN.
THE VICTIM IS STAYING WITH A FRIEND AND DOES
NOT LIVE LOCALLY. THE INJURY IS SMALL HOWEVER
THE SKIN HAS BROKEN. HE HAS BEEN GIVEN ADVICE
REGARDING HAVING A TETANUS,

..	29/09/2016 12:14:49 5381	31	REMARKS
PA306 2 - AVAILABLE, RESUMING PATROL	29/09/2016 12:14:49 5381	31	REMARKS
SNT INFO TAG ADDED	29/09/2016 12:14:52 5381	31	REMARKS
ENGAGE TAG ADDED	29/09/2016 12:33:43 5381	31	SYSTEM
PA306 - FOR SNT ENGAGEMENT	29/09/2016 12:33:54 5381	31	SYSTEM
# Arrests # Cautions # Reports	29/09/2016 12:34:04 5381	31	SYSTEM
DISPOSAL CODE-: CR15.1	29/09/2016 12:34:25 5381	31	REMARKS
NSIR Qualifiers: OT1.1	29/09/2016 12:36:16 5381	31	DISPOSE
WK-20160929-0131 HAS BEEN DISPOSED OR DEFERRED	29/09/2016 12:36:16 5381	31	DISPOSE
Cross Referenced By Incident WK-20160929-0180	29/09/2016 12:36:16 5381	31	DISPOSE
SNT INFO TAG REMOVED	29/09/2016 12:36:16 5381	31	DISPOSE
ENGAGE TAG REMOVED	29/09/2016 13:50:45 5381	31	SYSTEM
NS64/NS52 - ATTENDED WITH DOG WARDEN STRONG	29/09/2016 15:22:46 6251	WAR100327	SYSTEM
WORDS OF ADVICE GIVEN	29/09/2016 15:22:46 6251	WAR100327	SYSTEM
Reason for Print:HH	29/09/2016 15:23:27 6251	WAR100327	REMARKS
	15/11/2018 09:18:28 5904	DTE05570	SYSTEM

---- Relations ----

CALL CARD - XREF CALL
UNIFI -

WK-20160929-0180 (N51L) ASSOCIATED BY OPERATOR 5381
23N5/343107/16

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WARWICKSHIRE POLICE RESTRICTED

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Incident Report / WK-20160929-0180 / WK-2016-0120753

29/09/2016 13:27:20 (ANIMAL) ANIMAL**CONSIDER PCSO** / PA306 CRIME
Priority:(1) EMERGENCY - URBAN Source999
Disposal Codes (1-6):-CR15.1/ / / /
Operator No:-5358 Scenario:-WARKS
Dispatcher No:-5973
Handling Unit:-PA304

Beat:-N51NUN N+B
RIAN51L (436740,290233)

Creator Wkst:-48
Owner Wkst:-50
Officer in case:-0609

----- Address Information -----

Approx Location
9999 DONNITHORNE AVE, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:
Address:

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

----- Date/Time Info. -----

INITIAL INPUT	29/09/2016	13:27:06
HELD	29/09/2016	13:27:06
UNACTIONED	29/09/2016	13:27:20
ASSIGNED	29/09/2016	13:28:17
DISPATCHED	29/09/2016	13:29:58
AT SCENE	29/09/2016	13:31:15
CLEARED	29/09/2016	13:35:04
RESULTED	29/09/2016	13:57:53
DISPOSED	29/09/2016	16:47:15

----- Comments -----

Alias DONNITHORNE AVE used to find DONNITHORNE AVE	29/09/2016 13:28:17 5358	48	REMARKS
999: 436682 ,290214 ,1871 ,1871, 90 ,0 ,OSGB36, *MOB* 02 ,99,20160929132700,0 ,DATA AVAILABLE ,20346745 20160929 132706	29/09/2016 13:28:27 5358	48	SYSTEM
INF IS REPORTING THAT THERE ARE LOTS OF DOGS RUNNING LOOSE FROM THE TRAVELLERS AND INF HAS BEEN BITTEN ON THE BACK OF THE LEG	29/09/2016 13:28:29 5358	48	REMARKS
THE DOGS ARE STILL LOOSE	29/09/2016 13:29:03 5358	48	REMARKS
PREVIOUS CALLS VIEWED 9999 DONNITHORNE AVE	29/09/2016 13:29:03 5358	48	REMARKS
PREVIOUS CALLS VIEWED 9999 DONNITHORNE AVE	29/09/2016 13:29:11 5358	48	REMARKS
Comments viewed via auto pop-up, Location	29/09/2016 13:29:11 5358	48	REMARKS
Comments 9999 DONNITHORNE AVE	29/09/2016 13:29:38 5358	48	SYSTEM
Priority Transfer To 01NORTHERN From Workstation 48 Priority Control	29/09/2016 13:29:49 5358	48	SYSTEM
Priority Transfer Accepted At Terminal 50 For Control	29/09/2016 13:30:01 5358	48	SYSTEM
Comments viewed via auto pop-up, Location	29/09/2016 13:30:02 5358	48	SYSTEM
Comments 9999 DONNITHORNE AVE	29/09/2016 13:30:06 5358	48	REMARKS
INF DECLINED AMBO - HE HAS BLOOD COMING FROM THE WOUND	29/09/2016 13:30:11 5973	50	SYSTEM
DOG TAG ADDED	29/09/2016 13:30:11 5973	50	SYSTEM
THERE IS ABOUT 6 JACK RUSSELS AND LOTS OF PUPS	29/09/2016 13:30:11 5973	50	SYSTEM
PA304 MOBILISED BY DRAG/DROP	29/09/2016 13:30:28 5358	48	REMARKS
MOBILISATION MESSAGE SENT TO PA304(1634 ROBERTS #2346522), PA304 #2346523): WK-20160929-0180: ANIMAL; Approx Location: 9999	29/09/2016 13:30:29 5358	48	REMARKS
	29/09/2016 13:30:48 5358	48	SYSTEM
	29/09/2016 13:30:51 5358	48	REMARKS
	29/09/2016 13:31:08 5358	48	REMARKS
	29/09/2016 13:31:09 5358	48	REMARKS
	29/09/2016 13:31:15 5973	50	SYSTEM
	29/09/2016 13:31:17 AIRWAVE	AIRWAVE	SYSTEM

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Incident Report / WK-20160929-0180 / WK-2016-0120753

HE IS NOT WANTING TO MAKE ANY FORMAL
COMPLAINT REGARDING THIS BUT WAS MORE
CONCERNED ABOUT YOUNG CHILDREN AND VULNERABLE
ELDERLY PEOPLE IN THE AREA AS THIS IS NEAR TO
A SCHOOL ROUTE AND DIRECTLY OPPOSITE AN ELDERLY
PERSONS' CARE HOME.,

29/09/2016 16:46:31 5975

31

REMARKS

SNT INFO TAG ADDED

Arrests # Cautions # Reports

DISPOSAL CODE:- CR15.1

NSIR Qualifiers: OT1.1

WK-20160929-0180 HAS BEEN DISPOSED OR DEFERRED

Reason for Print:HH

29/09/2016 16:46:31 5975

31

REMARKS

29/09/2016 16:46:31 5975

31

REMARKS

29/09/2016 16:47:05 5975

31

SYSTEM

29/09/2016 16:47:15 5975

31

DISPOSE

29/09/2016 16:47:15 5975

31

DISPOSE

29/09/2016 16:47:15 5975

31

DISPOSE

29/09/2016 16:47:15 5975

31

DISPOSE

15/11/2018 09:19:13 5904

DTE05570

SYSTEM

---- Relations ----

CALL CARD - XREF CALL

CALL CARD - XREF CALL

MOBILE - ISR RELATION

WK-20160929-0131 (N51L) ASSOCIATED BY OPERATOR 5381

WK-20160929-0192 (N51L) ASSOCIATED BY OPERATOR 5381

436882,290214,1871,1871,90,0

999: 436882 ,290214 ,1871 ,1871, 90 ,0

,OSGB36, *MOB* 02 ,99,20160929132700,0 ,DATA AVAILA

BLE ,20346745 20160929 132706

PERSON - CALLER

23N5/34334U/16

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Statement on behalf of the Claimant

Witness: A Scruton

1st Statement

Dated: 6th March 2019

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION
187B TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE
BOROUGH OF NUNEATON AND BEDWORTH

Defendants

Exhibit "AS 54"

15/11/2018
09:05:29
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WARWICKSHIRE POLICE RESTRICTED

Incident Report / WK-20160922-0356 / WK-2016-0117670

1793
ASS4

22/09/2016 20:48:50 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING
Priority:(4) SCHEDULED Source999
Disposal Codes (1-6):--AD06.1/ / / / /
Operator No:-4650 Scenario:-WARKS
Dispatcher No:-
Handling Unit:-

Beat:-N51NUN N+B
RIAN51H (437593,292252)

Creator Wkst:-58
Owner Wkst:-42
Officer in case:-5374

----- Address Information -----

Approx Location
9999 TIVERTON DR, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:-
Address:-

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-
Email:-

----- Date/Time Info. -----

Event	Date	Time
INITIAL INPUT	22/09/2016	20:48:33
HELD	22/09/2016	20:48:33
UNACTIONED	22/09/2016	20:48:50
ASSIGNED	22/09/2016	20:49:21
DISPATCHED	22/09/2016	20:50:10
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	22/09/2016	20:53:23

----- Comments -----

Comment	Date	Time	Ref	System	
899: [REDACTED]	22/09/2016	20:48:50	4650	58	SYSTEM
PREVIOUS CALLS VIEWED [REDACTED]	22/09/2016	20:49:07	4650	58	SYSTEM
Alias TIVERTONDRIVE used to find TIVERTON DR	22/09/2016	20:49:21	4650	58	REMARKS
6 CARAVANS HAS JUST GONE DOWN TIVERTON DRIVE	22/09/2016	20:49:53	4650	58	REMARKS
TOWARDS ETONE SCHOOL PARK	22/09/2016	20:49:54	4650	58	REMARKS
Transfer To OINORTHERN From Workstation 58	22/09/2016	20:50:27	4650	58	SYSTEM
Control					
# SCHEDULED - POLICE ATTENDANCE REQUIRED BUT	22/09/2016	20:50:35	4650	58	REMARKS
NOT P OR E					
Transfer Accepted At Workstation 42 For Control	22/09/2016	20:51:57	4637	42	SYSTEM
Cross Referenced By Incident WK-20160922-0351	22/09/2016	20:52:16	5374	31	SYSTEM
**	22/09/2016	20:53:09	5374	31	REMARKS
PLEASE SEE CROSS REF	22/09/2016	20:53:13	5374	31	REMARKS
**	22/09/2016	20:53:14	5374	31	REMARKS
# Arrests # Cautions # Reports	22/09/2016	20:53:23	5374	31	DISPOSE
DISPOSAL CODE:- AD06.1	22/09/2016	20:53:23	5374	31	DISPOSE
BRIGN TAG ADDED	22/09/2016	20:53:23	5374	31	SYSTEM
NSIR Qualifiers: OT1.1	22/09/2016	20:53:23	5374	31	DISPOSE
WK-20160922-0356 HAS BEEN DISPOSED OR DEFERRED	22/09/2016	20:53:23	5374	31	DISPOSE
Cross Referenced To Incident WK-20160923-0085	23/09/2016	08:51:08	4347	31	SYSTEM
WK-20160922-0356 PRINTED AT	23/09/2016	08:59:46	1747	WAR100328	SYSTEM
WORKSTATION:WAR100328 -> HP LJ P3015 -					
WAR100703 (B&W)	23/09/2016	08:59:46	1747	WAR100328	SYSTEM
Reason for Print:.	23/09/2016	12:01:31	4347	31	SYSTEM
Cross Referenced To Incident WK-20160923-0189	23/09/2016	13:26:50	4069	50	SYSTEM
Cross Referenced To Incident WK-20160923-0229	23/09/2016	13:27:26	4347	31	SYSTEM
Cross Referenced To Incident WK-20160923-0229	15/11/2018	09:05:29	5904	DTE05570	SYSTEM
Reason for Print:HH					

----- Relations -----

Card	Ref	System
CALL CARD - XREF CALL	WK-20160922-0351 (N51H)	ASSOCIATED BY OPERATOR 5374
CALL CARD - XREF CALL	WK-20160923-0085 (N51H)	ASSOCIATED BY OPERATOR 4347
CALL CARD - XREF CALL	WK-20160923-0229 (N51H)	ASSOCIATED BY OPERATOR 4347
CALL CARD - XREF CALL	WK-20160923-0229 (N51H)	ASSOCIATED BY OPERATOR 4069
WK:TRESPASS:4069		

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WARWICKSHIRE POLICE RESTRICTED

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Incident Report / WK-20160922-0356 / WK-2016-0117670

CALL CARD - XREF CALL WK-20160923-0189 (N51H) ASSOCIATED BY OPERATOR 4347

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5904
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WARWICKSHIRE POLICE RESTRICTED

1795

Incident Report / WK-20160923-0229 / WK-2016-0117959

23/09/2016 13:24:25 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / SECTION 61
Priority:(4) SCHEDULED Source:RADIO
Disposal Codes (1-6):-AS22.1/ / / /
Operator No:-4069 Scenario:-WARKS
Dispatcher No:-4069
Handling Unit:-NN50

Beat:-N51NUN N+B
RIAN51H (437593,292252)

Creator Wkst:-50
Owner Wkst:-31
Officer in case:-1747

----- Address Information -----

Approx Location
9999 TIVERTON DR, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:-NN50 1ST_NAME(CONFIRM_SPELLING)
Address:-,

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

----- Date/Time Info. -----

INITIAL INPUT	23/09/2016	13:24:25
HELD	23/09/2016	13:25:03
NACTIONED	23/09/2016	13:25:16
ASSIGNED		
DISPATCHED	23/09/2016	13:25:33
AT SCENE	23/09/2016	13:25:36
CLEARED	23/09/2016	19:15:21
RESULTED		
DISPOSED	23/09/2016	19:15:30

----- Comments -----

SECTION 61 NOTICE TO LEAVE BY 1800 TONIGHT	23/09/2016 13:24:39 4069	50	REMARKS
AUTHORISED BY [REDACTED]	23/09/2016 13:24:48 4069	50	REMARKS
NN50 MOBILISED BY DRAG/DROP	23/09/2016 13:25:33 4069	50	SYSTEM
NN50 6 - AT SCENE/DEALING WITH INC.	23/09/2016 13:25:36 4069	50	SYSTEM
Cross Referenced By Incident WK-20160922-0356	23/09/2016 13:26:50 4069	50	SYSTEM
WK:TRESPASS:4069			
PREVIOUS CALLS VIEWED 9999 TIVERTON DR	23/09/2016 13:26:51 4069	50	SYSTEM
Cross Referenced By Incident WK-20160923-0085	23/09/2016 13:26:59 4347	31	SYSTEM
Cross Referenced By Incident WK-20160922-0358	23/09/2016 13:27:17 4347	31	SYSTEM
Cross Referenced By Incident WK-20160922-0356	23/09/2016 13:27:25 4347	31	SYSTEM
Cross Referenced By Incident WK-20160922-0351	23/09/2016 13:27:33 4347	31	SYSTEM
(0546) MOBILISED VIA GIS	23/09/2016 13:45:24 4069	50	SYSTEM
NC50 MOBILISED VIA GIS	23/09/2016 13:45:33 4069	50	SYSTEM
BE61 MOBILISED VIA GIS	23/09/2016 13:45:41 4069	50	SYSTEM
NN50 6 - AT SCENE/DEALING WITH INC.	23/09/2016 13:48:31 SYSTEM	ARLSERVER	SYSTEM
(0546) 6 - AT SCENE/DEALING WITH INC.	23/09/2016 13:49:35 SYSTEM	ARLSERVER	SYSTEM
CALL FROM [REDACTED] TEL NUMBER [REDACTED] I HAVE	23/09/2016 13:49:59 5115	49	REMARKS
JUST SPOKEN TO THE COUNCIL ABOUT THE			
TRAVELLERS ON SAVED LOCATION.			
I WAS WONDERING IF THE STREET LIGHTS COULD BE	23/09/2016 13:50:51 5115	49	REMARKS
LEFT ON ALL NIGHT.			
I BELIEVE THIS HAPPENED THE OTHER NIGHT.	23/09/2016 13:51:17 5115	49	REMARKS
	23/09/2016 13:51:18 5115	49	REMARKS
	23/09/2016 13:51:21 SYSTEM	ARLSERVER	SYSTEM
BE61 6 - AT SCENE/DEALING WITH INC.	23/09/2016 13:56:22 4069	50	SYSTEM
Vehicle searched: MK60NWG	23/09/2016 13:56:25 4069	50	SYSTEM
Vehicle selected: MK60NWG	23/09/2016 13:56:31 4069	50	REMARKS
OTHER MK60NWG	23/09/2016 13:56:45 4069	50	SYSTEM
Vehicle searched: BK15WDR	23/09/2016 13:56:47 4069	50	SYSTEM
Vehicle selected: BK15WDR	23/09/2016 13:56:51 4069	50	REMARKS
OTHER BK15WDR	23/09/2016 13:57:48 4069	50	SYSTEM
Vehicle searched: NA61OJL	23/09/2016 13:57:50 4069	50	SYSTEM
Vehicle selected: NA61OJL	23/09/2016 13:57:53 4069	50	REMARKS
OTHER NA61OJL	23/09/2016 13:58:15 4069	50	SYSTEM
Vehicle searched: NA07HUY	23/09/2016 13:58:55 4069	50	REMARKS
OTHER NA07HUY	23/09/2016 13:59:07 4069	50	SYSTEM
Vehicle searched: ND62HUY	23/09/2016 13:59:09 4069	50	SYSTEM
Vehicle selected: ND62HUY	23/09/2016 14:00:10 4069	50	REMARKS
OTHER ND62HUY	23/09/2016 14:08:40 4069	50	REMARKS
FROM 546 WE HAVE JUST SERVED THE SEC 61 TO			
NINE CARAVANS			
THOSE WHO WERE PRESENT HAVE BEEN SPOKEN TO	23/09/2016 14:08:54 4069	50	REMARKS

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15/11/2018
09:06:25
5904
DTE05570

WARWICKSHIRE POLICE RESTRICTED

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Incident Report / WK-20160923-0229 / WK-2016-0117959

Text	Date/Time	Code	Value	Remarks
DIRECTION TO LEAVE IS AT 1800	23/09/2016 14:09:00	4069	50	REMARKS
WE WILL MONITOR	23/09/2016 14:09:05	4069	50	REMARKS
IF THEY HAVE NOT LEFT BY THEN	23/09/2016 14:09:14	4069	50	REMARKS
WE WILL HAVE TO REVIEW AND POSSIBLY ATTEND WITH MORE UNITS	23/09/2016 14:09:29	4069	50	REMARKS
***	23/09/2016 14:09:30	4069	50	REMARKS
(0546) 2 - AVAILABLE, RESUMING PATROL	23/09/2016 14:46:48	4069	50	SYSTEM
BE61 2 - AVAILABLE, RESUMING PATROL	23/09/2016 14:46:49	4069	50	SYSTEM
NN50 2 - AVAILABLE, RESUMING PATROL	23/09/2016 14:46:52	4069	50	SYSTEM
NT51 MOBILISED VIA GIS	23/09/2016 14:47:02	4069	50	SYSTEM
NT51 6 - AT SCENE/DEALING WITH INC.	23/09/2016 14:47:04	4069	50	SYSTEM
NS01 MOBILISED BY DRAG/DROP	23/09/2016 14:47:21	4069	50	SYSTEM
NS01 6 - AT SCENE/DEALING WITH INC.	23/09/2016 14:47:22	4069	50	SYSTEM
CH... FURTHER CALL FROM [REDACTED]	23/09/2016 14:59:33	5377	13	REMARKS
[REDACTED] TO SAY HE COLLECTS THE POST AND HE WENT INTO THE HORSETON GRANGE POST OFFICE AND [REDACTED] THERE HAS HAD PEOPLE COME IN				
TODAY ASKING WHATS THEIR POST CODE - THINKS THEY WERE TRAVELLERS, THERE IS NO ONE HERE NOW BUT ITS WAS AT 14:30	23/09/2016 15:00:07	5377	13	REMARKS
Transfer To DINORTHERN From Workstation 13	23/09/2016 15:00:12	5377	13	SYSTEM
Control				
INFORMANT THINKS BY SAT AND SUN THERE WILL BE LOADS OF TRAVELLERS THERE	23/09/2016 15:00:36	5377	13	REMARKS
Transfer Accepted At Workstation 31 For Control	23/09/2016 15:02:00	4347	31	SYSTEM
	23/09/2016 15:02:19	4347	31	REMARKS
CONTROL - NOTED.	23/09/2016 15:02:21	4347	31	REMARKS
NT51 HAVE BEEN AND SEE TRAVELLERS AND ADVISED THEM THAT THEY HAVE A HOUR LEFT AND THEIR REPLY WAS I HOPE YOU HAVE ENOUGH POLICE CELLS AS WE ARE NOT MOVING	23/09/2016 16:55:58	5976	50	REMARKS
**				
PA222 MOBILISED BY DRAG/DROP	23/09/2016 16:56:00	5976	50	REMARKS
PA223 MOBILISED BY DRAG/DROP	23/09/2016 17:57:32	5976	50	SYSTEM
PA222 6 - AT SCENE/DEALING WITH INC.	23/09/2016 17:57:36	5976	50	SYSTEM
PA223 6 - AT SCENE/DEALING WITH INC.	23/09/2016 17:57:38	5976	50	SYSTEM
PA404 MOBILISED BY DRAG/DROP	23/09/2016 17:57:39	5976	50	SYSTEM
PA404 6 - AT SCENE/DEALING WITH INC.	23/09/2016 18:09:55	4853	31	SYSTEM
NC50 MOST ARE HOOKED UP LOOKING LIKE MOVING	23/09/2016 18:09:56	4853	31	SYSTEM
THEY HAVE MOVED OFF FROM THIS LOCATION	23/09/2016 18:27:34	5976	50	REMARKS
NC50 2 - AVAILABLE, RESUMING PATROL	23/09/2016 19:15:18	4853	31	REMARKS
NS01 2 - AVAILABLE, RESUMING PATROL	23/09/2016 19:15:19	4853	31	SYSTEM
NT51 2 - AVAILABLE, RESUMING PATROL	23/09/2016 19:15:20	4853	31	SYSTEM
PA222 2 - AVAILABLE, RESUMING PATROL	23/09/2016 19:15:20	4853	31	SYSTEM
PA223 2 - AVAILABLE, RESUMING PATROL	23/09/2016 19:15:20	4853	31	SYSTEM
PA404 2 - AVAILABLE, RESUMING PATROL	23/09/2016 19:15:21	4853	31	SYSTEM
* Arrests * Cautions * Reports	23/09/2016 19:15:30	4853	31	DISPOSE
DISPOSAL CODE:- AS22.1	23/09/2016 19:15:30	4853	31	DISPOSE
NSIR Qualifiers: OT1.1	23/09/2016 19:15:30	4853	31	DISPOSE
WK-20160923-0229 HAS BEEN DISPOSED OR DEFERRED	23/09/2016 19:15:30	4853	31	DISPOSE
Reason for Print:HH	15/11/2018 09:06:25	5904	DTE05570	SYSTEM

--- Relations ---

Text	Code	Value	Remarks
CALL CARD - XREF CALL	WK-20160922-0358 (N51H)	ASSOCIATED	BY OPERATOR 4347
CALL CARD - XREF CALL	WK-20160922-0356 (N51H)	ASSOCIATED	BY OPERATOR 4347
CALL CARD - XREF CALL	WK-20160922-0356 (N51H)	ASSOCIATED	BY OPERATOR 4069
	WK:TRESPASS:4069		
CALL CARD - XREF CALL	WK-20160922-0351 (N51H)	ASSOCIATED	BY OPERATOR 4347
CALL CARD - XREF CALL	WK-20160923-0085 (N51H)	ASSOCIATED	BY OPERATOR 4347
VEHICLE - OTHER	MK60NWG		
	FORD MONDEO SALOON SILVER		
VEHICLE - OTHER	BK15WDR		
	FORD FOCUS SALOON BLACK		
VEHICLE - OTHER	NA61OJL		
	FORD TRANSIT PANEL VAN WHITE		
VEHICLE - OTHER	ND62HUY		
	FORD TRANSIT PANEL VAN WHITE		
VEHICLE - OTHER	NA07HUY		
	FORD TRANSIT TIPPER WHITE		

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Statement on behalf of the Claimant

Witness: A Scruton

1st Statement

Dated: 6th March 2019

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2014-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION
187B TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE
BOROUGH OF NUNEATON AND BEDWORTH

Defendants

Exhibit "AS 55"

15/11/2018
08:50:09
5904
DTE05570

WARWICKSHIRE POLICE RESTRICTED

Incident Report / WK-20160916-0093 / WK-2016-0114611

AS34 1798

16/09/2016 08:57:50 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING
Priority:(4) SCHEDULED SourceTEL
Disposal Codes (1-6):-AS23.1/ / / / /
Operator No:-5457 Scenario:-WARKS
Dispatcher No:-
Handling Unit:-

Beat:-N51NUN N+B
RIAN51J (437579,290858)

Creator Wkst:-13
Owner Wkst:-50
Officer in case:-5345

---- Address Information ----

UNIT
SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, CV116RP

Proximity:-
[X] Valid Gazetteer:-

---- Complainant Details ----

Surname/First Name:
Address:

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

---- Date/Time Info. ----

INITIAL INPUT	16/09/2016	08:57:50
HELD	16/09/2016	08:57:50
UNACTIONED	16/09/2016	08:58:48
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	16/09/2016	09:05:55

---- Comments ----

Created from Shadow Incident	16/09/2016 08:57:50 5457	13	REMARKS
NPT Priority= Vulnerable=, ETA given=.	16/09/2016 08:57:50 5457	13	SYSTEM
3 TRAVELLERS WERE ON SITE - COUNCIL WONT EVICT THEM	16/09/2016 08:58:09 5457	13	REMARKS
*	16/09/2016 08:58:09 5457	13	REMARKS
4 HAVE TURNED UP OVER NIGHT - IN CARAVANS AND ARE BLOCKING ACCESS TO THE UNITS	16/09/2016 08:58:46 5457	13	REMARKS
*	16/09/2016 08:58:46 5457	13	REMARKS
PREVIOUS CALLS VIEWED	16/09/2016 09:00:16 5457	13	SYSTEM
THEY HAVE NOT ENGAGED WITH THE TRAVELLERS	16/09/2016 09:00:34 5457	13	REMARKS
*	16/09/2016 09:00:34 5457	13	REMARKS
4 "EXPENSIVE LOOKING CARAVANS" ARE NOW BLOCKING ACCESS TO THE OTHER UNITS AND PARKED IN THEIR PARKING AREAS - COUNCIL ADVISED INF TO CALL POLICE	16/09/2016 09:01:20 5457	13	REMARKS
*	16/09/2016 09:01:23 5457	13	REMARKS
Transfer To DlnORTHERN From Workstation 13	16/09/2016 09:01:24 5457	13	SYSTEM
Control			
# SCHEDULED - POLICE ATTENDANCE REQUIRED BUT NOT P OR E	16/09/2016 09:01:47 5457	13	REMARKS
Transfer Accepted At Workstation 50 For Control	16/09/2016 09:01:56 5345	50	SYSTEM
NE50 - WE ARE ALREADY AWARE OF THESE. IM PAYING ATTENTION TO THESE THROUGH THE DAY	16/09/2016 09:04:57 5345	50	REMARKS
SNT INFO TAG ADDED	16/09/2016 09:05:41 5345	50	SYSTEM
# Arrests # Cautions # Reports	16/09/2016 09:05:54 5345	50	DISPOSE
DISPOSAL CODE:- AS23.1	16/09/2016 09:05:54 5345	50	DISPOSE
NSIR Qualifiers: OT1.1	16/09/2016 09:05:54 5345	50	DISPOSE
WK-20160916-0093 HAS BEEN DISPOSED OR DEFERRED	16/09/2016 09:05:55 5345	50	DISPOSE
Reason for Print:HH	15/11/2018 08:50:09 5904	DTE05570	SYSTEM

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15/11/2018
08:52:06
5904
DTE05570

WARWICKSHIRE POLICE RESTRICTED

Incident Report / WK-20160918-0223 / WK-2016-0115759

1799

18/09/2016 14:29:40 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING
Priority: (1) EMERGENCY - URBAN Source: TEL
Disposal Codes (1-6): -AS22.1 / / / /
Operator No: -5438 Scenario: -WARKS
Dispatcher No: -5208
Handling Unit: -PA305

Beat: -N51NUN N+B
RIAN51J (437500,290883)

Creator Wkst: -30
Owner Wkst: -31
Officer in case: -1134

----- Address Information -----

Approx Location
9999 SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON,

Proximity: -
[X] Valid Gazetteer: -

----- Complainant Details -----

Surname/First Name: [REDACTED]
Address: [REDACTED]

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity: -, , -
Email: -

----- Date/Time Info. -----

INITIAL INPUT	18/09/2016	14:29:40
HELD	18/09/2016	14:30:32
UNACTIONED	18/09/2016	14:31:16
ASSIGNED		
DISPATCHED	18/09/2016	14:33:37
AT SCENE	18/09/2016	14:41:01
CLEARED	18/09/2016	14:44:47
RESULTED		
DISPOSED	18/09/2016	14:45:04

----- Comments -----

Alias SLINGY CL used to find SLINGSBY CL	18/09/2016 14:30:32 5438	30	REMARKS
TRAVELLERS HAVE TURNED UP ON THE INDUSTRIAL	18/09/2016 14:30:55 5438	30	REMARKS
ESTATE			
BLOCKING THE UNITS AND THROWING STUFF OUT THE	18/09/2016 14:31:06 5438	30	REMARKS
SKIPS			
	18/09/2016 14:31:07 5438	30	REMARKS
INF CAN'T GET OUT THE UNIT	18/09/2016 14:31:15 5438	30	REMARKS
Priority Transfer To 01NORTHERN From	18/09/2016 14:31:19 5438	30	SYSTEM
Workstation 30 Priority Control			
Priority Transfer Accepted At Terminal 31 For	18/09/2016 14:31:28 5208	31	SYSTEM
Control			
THEY ARE NOW PEELING THE ROOF BACK AND	18/09/2016 14:31:40 5438	30	REMARKS
CLIMBING OVER FENCES			
	18/09/2016 14:31:41 5438	30	REMARKS
	18/09/2016 14:31:47 5438	30	REMARKS
INF IS IN UNIT 13	18/09/2016 14:31:48 5438	30	REMARKS
	18/09/2016 14:31:59 5438	30	REMARKS
CAN HEAR KIDS SHOUTING IN THE BACKGROUND	18/09/2016 14:32:26 5438	30	REMARKS
	18/09/2016 14:32:37 5438	30	REMARKS
THERE WERE 7 CARAVANS THERE BUT NOW 9 IN TOTAL	18/09/2016 14:32:43 5438	30	REMARKS
	18/09/2016 14:32:57 5438	30	REMARKS
THEY ARE CLIMBING ON THE OUTSIDE BIT OF ONE OF			
THE UNITS	18/09/2016 14:33:03 5438	30	REMARKS
	18/09/2016 14:33:07 5438	30	REMARKS
THESE ARE THE TEENAGERS	18/09/2016 14:33:16 5438	30	SYSTEM
PREVIOUS CALLS VIEWED [REDACTED]			
PA305 MOBILISED BY DRAG/DROP	18/09/2016 14:33:37 5208	31	SYSTEM
MOBILISATION MESSAGE SENT TO PA305(1134 [REDACTED])	18/09/2016 14:33:37 AIRWAVE	AIRWAVE	SYSTEM
#2341032): WK-20160918-0223; TRESPASS; Approx			
Location: 9999 SLINGSBY CL, ATTLEBOROUGH			
FIELDS, NUNEATON; [REDACTED]			
INF DOESN'T WANT TO BE INVOLVED AS HE'S	18/09/2016 14:34:15 5438	30	REMARKS
WORRIED ABOUT REPERCUSSIONS			
HE SAID HE WANTS TO LEAVE BEFORE OFFICERS SHOW	18/09/2016 14:34:54 5438	30	REMARKS
UP SO CLEARED THE LINE			
	18/09/2016 14:34:56 5438	30	REMARKS
# EMERGENCY - INJURY/LOSS IN PROGRESS	18/09/2016 14:35:01 5438	30	REMARKS
PA203 - WILL FIND SOME L/T OT BACK THEM UP	18/09/2016 14:35:06 5208	31	REMARKS
PREVIOUS CALLS VIEWED 9999 SLINGSBY CL	18/09/2016 14:35:50 5438	30	SYSTEM
PREVIOUS CALLS VIEWED 9999 SLINGSBY CL	18/09/2016 14:37:08 5267	50	SYSTEM

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08:52:06

Incident Report / WK-20160918-0223 / WK-2016-0115759

5904

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PREVIOUS CALLS VIEWED 9999	18/09/2016 14:37:19 5438	30	SYSTEM
PREVIOUS CALLS VIEWED	18/09/2016 14:37:51 5438	30	SYSTEM
OR31 MOBILISED BY DRAG/DROP	18/09/2016 14:38:00 5208	31	SYSTEM
MOBILISATION MESSAGE SENT TO OR31(0162	18/09/2016 14:38:01 AIRWAVE	AIRWAVE	SYSTEM
ROBERTSON #2341034), OR31(1268 DEAR #2341035),			
OR31(#2341036): WK-20160918-0223: TRESPASS;			
Approx Location: 9999			
	18/09/2016 14:38:01 AIRWAVE	AIRWAVE	SYSTEM
	18/09/2016 14:38:53 5267	50	SYSTEM
PA401 MOBILISED BY DRAG/DROP	18/09/2016 14:39:42 AIRWAVE	AIRWAVE	SYSTEM
MOBILISATION MESSAGE SENT TO PA401(1222			
#2341038), PA401(1211			
#2341039): WK-20160918-0223: TRESPASS; Approx			
Location: 9999			
	18/09/2016 14:39:42 AIRWAVE	AIRWAVE	SYSTEM
PA305 6 - AT SCENE/DEALING WITH INC.	18/09/2016 14:41:01 5208	31	SYSTEM
OR31 2 - AVAILABLE, RESUMING PATROL	18/09/2016 14:42:16 5208	31	SYSTEM
PA305- SEEMS THEY WERE DUMPING STUFF, I HAVE	18/09/2016 14:44:33 5267	50	REMARKS
ASKED THEM TO PICK IT UP AND THEY HAVE GONE ON			
THEIR WAY			
NO OFFENCES	18/09/2016 14:44:35 5267	50	REMARKS
***	18/09/2016 14:44:36 5267	50	REMARKS
PA305 2 - AVAILABLE, RESUMING PATROL	18/09/2016 14:44:39 5267	50	SYSTEM
Transfer To 31 From Workstation 50 Action	18/09/2016 14:44:47 5267	50	SYSTEM
PA401 2 - AVAILABLE, RESUMING PATROL	18/09/2016 14:44:47 5267	50	SYSTEM
TRANSFERS CLEARED ON DISPOSAL: 31(ACTION)	18/09/2016 14:45:04 5267	50	REMARKS
# Arrests # Cautions # Reports	18/09/2016 14:45:04 5267	50	DISPOSE
DISPOSAL CODE-: AS22.1	18/09/2016 14:45:04 5267	50	DISPOSE
NSIR Qualifiers: OT3.4	18/09/2016 14:45:04 5267	50	DISPOSE
WK-20160918-0223 HAS BEEN DISPOSED OR DEFERRED	18/09/2016 14:45:04 5267	50	DISPOSE
WK-20160918-0223 PRINTED AT	21/09/2016 12:51:05 1151	WAR100330	SYSTEM
WORKSTATION:WAR100330 -> HP LJ P3015 -			
WAR100703 (B&W)			
Reason for Print:SNT	21/09/2016 12:51:05 1151	WAR100330	SYSTEM
Reason for Print:HH	15/11/2018 08:52:06 5904	DTE05570	SYSTEM

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08:53:06
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WARWICKSHIRE POLICE RESTRICTED

1801

Incident Report / WK-20160918-0343 / WK-2016-0115879

18/09/2016 19:10:37 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / UPDATE AND CLOSE Beat:-N51NUN N+B
Priority: (4) SCHEDULED SourceTEL RIAN51J (437516,290848)
Disposal Codes (1-6):-AS22.1/ / / / /
Operator No:-5321 Scenario:-MARKS Creator Wkst:-14
Dispatcher No:-4760 Owner Wkst:-37
Handling Unit:-NE50 Officer in case:-1151

--- Address Information ---

NUNEATON AND BEDWORTH BOROUGH COUNCIL, UNIT
SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, CV116RP

Proximity:-
[X] Valid Gazetteer:-

--- Complainant Details ---

Surname/First Name: [REDACTED]
Address:-,
DOB / Sex / Ethnicity:-,
Email:-

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

--- Date/Time Info. ---

INITIAL INPUT	18/09/2016	19:10:37
HELD	18/09/2016	19:10:37
UNACTIONED	18/09/2016	19:11:55
ASSIGNED	19/09/2016	07:45:41
DISPATCHED	19/09/2016	09:07:15
AT SCENE	19/09/2016	09:07:18
CLEARED	19/09/2016	14:55:45
RESULTED		
DISPOSED	19/09/2016	17:38:59

--- Comments ---

Created from Shadow Incident	18/09/2016 19:10:37 5321	14	REMARKS
INF STATES NUMEROUS CARAVANS HAVE TURNED UP AT THIS SITE	18/09/2016 19:11:13 5321	14	REMARKS
THEY ARE BLOCKING ALL THE ENTRANCES TO THE UNITS	18/09/2016 19:11:33 5321	14	REMARKS
INF STATES THEY CANT GET THERE GOODS IN AND OUT	18/09/2016 19:11:41 5321	14	REMARKS
INFS IS A HERMES DELIVERY SERVICE	18/09/2016 19:11:48 5321	14	REMARKS
INF STATES THERE IS BACK 15 CARAVANS HERE	18/09/2016 19:12:19 5321	14	REMARKS
SHE STATES THIS IS GOING TO CAUSE AN ISSUE AT 0330 IN THE MORNING WHEN THE STAFF TURN UP TO START SORTING THE PARCELS	18/09/2016 19:12:43 5321	14	REMARKS
THEY HAVE ASKED THE TRAVELLERS TO MOVE	18/09/2016 19:12:53 5321	14	REMARKS
HOWEVER THEY HAVE REFUSED	18/09/2016 19:12:56 5321	14	REMARKS
* SCHEDULED - POLICE ATTENDANCE REQUIRED BUT NOT P OR E	18/09/2016 19:13:00 5321	14	REMARKS
Transfer To 01NORTHERN From Workstation 14	18/09/2016 19:13:04 5321	14	SYSTEM
Control			
Transfer Accepted At Workstation 31 For Control	18/09/2016 19:13:24 5345	31	SYSTEM
	18/09/2016 20:17:52 5375	30	REMARKS
	18/09/2016 20:18:25 5375	30	REMARKS
FURTHER CALL [REDACTED]			
REPORTING THE ABOVE, ALL UNITS BLOCKED. AROUND 20 CARAVANS ON SITE	18/09/2016 20:18:25 5375	30	REMARKS
	18/09/2016 20:18:27 5375	30	SYSTEM
Transfer To 01NORTHERN From Workstation 30			
Control			
Transfer Accepted At Workstation 31 For Control	18/09/2016 20:18:54 5345	31	SYSTEM
CALL CARD SUCCESSFULLY DEFERRED 18/09/2016	18/09/2016 20:44:32 5345	31	SYSTEM
22:00:00 Workstation Group 01NORTHERN			
	18/09/2016 20:44:32 5345	31	DEFER
CAD093: REACTIVATED AT MASTER	18/09/2016 22:00:42 SYSTEM	MASTER	SYSTEM
Transfer Accepted At Workstation 50 For Information	18/09/2016 22:01:45 4668	50	SYSTEM
**			
	18/09/2016 22:02:50 4668	50	REMARKS
	18/09/2016 22:03:16 4668	50	REMARKS
CNTRL - INFOS CAN YOU CALL INF BACK TO SEE IF THE TRAVELLERS ARE STILL BLOCKING THE ENTRANCES			
Transfer To 07.INFOS From Workstation 50	18/09/2016 22:03:21 4668	50	SYSTEM
Control			
Transfer Accepted At Workstation 37 For Control	18/09/2016 22:04:59 4069	37	SYSTEM
PHONE IS SWITCHED OFF.	18/09/2016 22:05:49 4069	37	REMARKS
NO MESSAGE SERVICE.	18/09/2016 22:05:54 4069	37	REMARKS
IT SAYS TO TRY LATER OR SEND A TEXT...	18/09/2016 22:06:06 4069	37	REMARKS

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1802

Incident Report / WK-20160918-0343 / WK-2016-0115879

Transfer To 01NORTHERN From Workstation 37	18/09/2016 22:06:09 4069	37	SYSTEM
Control			
Transfer Accepted At Workstation 42 For Control	18/09/2016 22:07:55 4405	42	SYSTEM
CNTR NOTED -FOR NIGHT SHIFT - PASSING	18/09/2016 22:08:13 4405	42	REMARKS
ATTENTION PLS+			
** THE SHIFT STARTS AT HERMES AT 0330 HRS	18/09/2016 22:08:44 4405	42	REMARKS

**	18/09/2016 22:16:23 4668	50	REMARKS
	18/09/2016 22:16:28 4668	50	REMARKS
CNTRL - UNITS AWARE	19/09/2016 06:30:24 4668	50	REMARKS
**	19/09/2016 06:30:37 4668	50	REMARKS
CNTRL - NO REPORTS OR CALLS DURING THE EARLY HOURS			
SNT INFO TAG ADDED	19/09/2016 06:30:40 4668	50	SYSTEM
**	19/09/2016 06:30:43 4668	50	REMARKS
	19/09/2016 06:30:53 4668	50	REMARKS
FOR SNT TO ATTEND PLS	19/09/2016 06:30:54 4668	50	REMARKS
**	19/09/2016 07:19:25 5381	50	SYSTEM
ENGAGE TAG ADDED	19/09/2016 07:45:41 4760	31	SYSTEM
NE50 ASSIGNED TO INCIDENT	19/09/2016 07:51:52 1151	WAR70254	SYSTEM
WK-20160918-0343 PRINTED AT			
WORKSTATION:WAR70254 -> HP LJ P3015 -			
WAR100703 (B&W)			
Reason for Print:SNT	19/09/2016 07:51:52 1151	WAR70254	SYSTEM
CH -FURTHER CALL FROM [REDACTED]	19/09/2016 08:01:13 4735	10	REMARKS
[REDACTED] HE HAS SOME OF			
THE TRAVELLERS ON HIS LAND, THEY ARE ALSO ON			
THE ROAD AND NOTHER PREMISES.			
HE STATES THEY ARE PARKED ALL OVER THE PLACE	19/09/2016 08:01:24 4735	10	REMARKS
AND CAUSING CHAOS.			
[REDACTED]	19/09/2016 08:01:38 4735	10	REMARKS
	19/09/2016 08:01:41 4735	10	SYSTEM
Transfer To 01NORTHERN From Workstation 10			
Control			
Transfer Accepted At Workstation 31 For Control	19/09/2016 08:01:52 4760	31	SYSTEM
WK-20160918-0343 PRINTED AT	19/09/2016 08:37:35 1151	WAR70254	SYSTEM
WORKSTATION:WAR70254 -> HP LJ P3015 -			
WAR100703 (B&W)			
Reason for Print:ATT	19/09/2016 08:37:35 1151	WAR70254	SYSTEM
NE50 MOBILISED BY DRAG/DROP	19/09/2016 09:07:15 4760	31	SYSTEM
NE50 6 - AT SCENE/DEALING WITH INC.	19/09/2016 09:07:18 4760	31	SYSTEM
*NE50 I HAVE BEEN TO THE LOCATION. THERE ARE	19/09/2016 09:38:04 1151	WAR70254	REMARKS
MORE VANS CRAMMED IN ROUND BY THE BUSINESSES.			
THEY ARE AFFECTING THE LOCAL BUSINESS A LITTLE			
BUT THEY ARE PARKED ON PRIVATE LAND. THE			
MANNER THAT THEY ARE AFFECTING THEM IS BY	19/09/2016 09:38:04 1151	WAR70254	REMARKS
TAKING UP SPACE. DELIVERIES CAN STILL BE			
FACILITATED.			
THESE NEW ARRIVALS APPEAR SEPARATE FROM THOSE	19/09/2016 09:38:04 1151	WAR70254	REMARKS
THAT WERE ALREADY THERE.			
THERE WAS A PERSON FROM NUNEATON COUNCIL	19/09/2016 09:38:04 1151	WAR70254	REMARKS
PRESENT ALSO. SOME TRAVELLER VEHICLES ARE			
PARKED ON THE PAVEMENT BUT THEN SO WERE SOME			
BUSINESS VEHICLES AND NOT JUST IN THE AFFECTED			
AREA.	19/09/2016 09:38:04 1151	WAR70254	REMARKS
I HAVE SPOKEN WITH [REDACTED] AND I HAVE			
STATED AT THIS STAGE WE DON'T FOR A SEC 61 AS			
MOST OF THE VANS ARE PARKED ON PRIVATE LAND.	19/09/2016 09:40:41 1151	WAR70254	REMARKS
*NE50 THERE IS COMMUNITY TENSION AS TO BE			
EXPECTED FROM LOCAL BUSINESSES. PLEASE LAVE			
LOG OPEN SO I CAN UPDATE ANY PROGRESS.	19/09/2016 09:41:31 1151	WAR70254	REMARKS
*LEAVE LOG OPEN	19/09/2016 09:43:25 1151	WAR70254	REMARKS
*NE50 I HAVE AN APPOINTMENT AT 1000 HRS SO			
WILL HAVE TO PROGRESS THIS AFTER.	19/09/2016 09:45:26 1151	WAR70254	REMARKS
*NE50 I WILL HAVE TO GO BACK TO SITE AND GET			
VEHICLE REG'S TO UPDATE THE LOG	19/09/2016 11:29:21 5378	30	REMARKS
	19/09/2016 11:29:43 5378	30	REMARKS
CH - I HAVE HAD A CALL FROM A [REDACTED]			
[REDACTED]			
HE OWNS 'MNS ACCIDENT REPAIRS'	19/09/2016 11:30:00 5378	30	REMARKS
HE SAID HES HAD A CALL FROM - MIDLANDS TODAY -	19/09/2016 11:30:25 5378	30	REMARKS
SAYING THEY WANT TO GET SOME CAMERA CREWS DOWN			
TO FILM THE TRAVELLERS			
NE50 2 - AVAILABLE,RESUMING PATROL	19/09/2016 11:30:26 4760	31	SYSTEM
HE WANTED TO CALL TO MAKE POLICE AWARE INCASE	19/09/2016 11:30:44 5378	30	REMARKS
OF ANY OTHER TROUBLE			

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Incident Report / WK-20160918-0343 / WK-2016-0115879

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Text	Date/Time	Ref	Page	Remarks
Transfer To 01NORTHERN From Workstation 30	19/09/2016 11:30:44	5378	30	REMARKS
Control	19/09/2016 11:30:49	5378	30	SYSTEM
Transfer Accepted At Workstation 31 For Control	19/09/2016 11:31:14	4760	31	SYSTEM
NE50 VEHICLES NA07HUY MK60NWG NA55EFY BK15WDR	19/09/2016 12:46:58	1151	WAR70254	REMARKS
HN15FXW LY02ZYT MK64LXH				
TRAVELLERS HAVE BEEN GIVEN A NOTICE TO LEAVE	19/09/2016 12:46:58	1151	WAR70254	REMARKS
BY COUNCIL PENDING THEM GOING TO COURT FOR AN ORDER.				
LOG CAN BE CLOSED	19/09/2016 12:46:58	1151	WAR70254	REMARKS
# Arrests # Cautions # Reports	19/09/2016 12:50:19	4760	31	DISPOSE
DISPOSAL CODE:- AS22.1	19/09/2016 12:50:19	4760	31	DISPOSE
NSIR Qualifiers: OT1.1	19/09/2016 12:50:19	4760	31	DISPOSE
WK-20160918-0343 HAS BEEN DISPOSED OR DEFERRED	19/09/2016 12:50:19	4760	31	DISPOSE
Previous Result Codes:-AS22.1	19/09/2016 14:55:44	4735	10	SYSTEM
QUALIFIERS WERE: OT1.1	19/09/2016 14:55:44	4735	10	SYSTEM
ENGAGE TAG REMOVED	19/09/2016 14:55:46	4735	10	SYSTEM
CAD093: REACTIVATED AT 10	19/09/2016 14:55:46	4735	10	SYSTEM
Transfer Accepted At Workstation 10 For Information	19/09/2016 14:55:50	4735	10	SYSTEM
CH - FURTHER CALL FROM [REDACTED] FROM NBBC	19/09/2016 14:56:15	4735	10	REMARKS
[REDACTED]				
THEY HAVE HAD COMPLAINTS FROM [REDACTED]	19/09/2016 14:57:01	4735	10	REMARKS
[REDACTED] COMPLAINING THAT THE TRAVELLER ARE CAUSING OBSTRUCTION CANNOT GET IN AND OUT OF PREMISES, EXCREMENT AND RUBBISH BUILDING UP AND MILK BEING STOLEN FROM LOCAL BUSINESSES.	19/09/2016 14:57:12	4735	10	REMARKS
HE IS ASKING IF THERE IS ANYTHING THE POLICE CAN DO TO ENCOURAGE THEM TO LEAVE.	19/09/2016 14:57:48	4735	10	REMARKS
THE COUNCIL ARE GOING THROUGH THE PROCESS OF GETTING A COURT ORDER BUT THIS WILL TAKE A FEW DAYS.	19/09/2016 14:58:06	4735	10	REMARKS
Transfer To 01NORTHERN From Workstation 10	19/09/2016 14:58:13	4735	10	SYSTEM
Control				
Transfer Accepted At Workstation 31 For Control	19/09/2016 15:09:46	4760	31	SYSTEM
[REDACTED]	19/09/2016 15:32:29	4760	31	REMARKS
NE50 - CURRENTLY COMMITTED BUT CAN [REDACTED]	19/09/2016 15:33:08	4760	31	REMARKS
BE CONTACTED AND ADVISED THAT IF THE LOCAL BUSINESSES ARE HAVING PROBLEMS THEY NEED TO RING IN AT THE TIME TO REPORT IT.				
THAT WAY UNITS CAN ATTEND WHEN THE PROBLEM IS HAPPENING. BELIEVE COURT ORDER IS BEING ARRANGED.	19/09/2016 15:34:00	4760	31	REMARKS
Transfer To 07.INFOS From Workstation 31	19/09/2016 15:34:28	4760	31	SYSTEM
Control				
COULD YOU UPDATE [REDACTED] PLEASE	19/09/2016 15:34:28	4760	31	REMARKS
Transfer Accepted At Workstation 37 For Control	19/09/2016 15:54:44	5459	37	SYSTEM
CTRL - THERE IS NO REPLY FROM THE TEL NO FOR [REDACTED]	19/09/2016 17:36:40	4458	31	REMARKS
[REDACTED]				
FOR SNT TO MAKE CONTACT TOMORROW PLSE	19/09/2016 17:36:46	4458	31	REMARKS
ENGAGE TAG ADDED	19/09/2016 17:36:54	4458	31	SYSTEM
# Arrests # Cautions # Reports	19/09/2016 17:38:59	4458	31	DISPOSE
DISPOSAL CODE:- AS22.1	19/09/2016 17:38:59	4458	31	DISPOSE
NSIR Qualifiers: OT1.1	19/09/2016 17:38:59	4458	31	DISPOSE
WK-20160918-0343 HAS BEEN DISPOSED OR DEFERRED	19/09/2016 17:38:59	4458	31	DISPOSE
SNT INFO TAG REMOVED	20/09/2016 13:43:34	6035	WAR100328	SYSTEM
ENGAGE TAG REMOVED	20/09/2016 13:43:35	6035	WAR100328	SYSTEM
Reason for Print:HH	15/11/2018 08:53:06	5904	DTE05570	SYSTEM

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Incident Report / WK-20160919-0310 / WK-2016-0116268

19/09/2016 17:54:39 (BURGLARY) Z**DO NOT USE** / PA302
Priority:(3) PRIORITY SourceE-MAIL
Disposal Codes (1-6):-CR03.1/ / / / /
Operator No:-5459 Scenario:-WARKS
Dispatcher No:-5267
Handling Unit:-PA302

Beat:-N51NUN N+B
RIAN51J (437452,290875)

Creator Wkst:-37
Owner Wkst:-31
Officer in case:-1825

----- Address Information -----

UNIT
[REDACTED] SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, CV116RP

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:
Address:

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

----- Date/Time Info. -----

INITIAL INPUT	19/09/2016	17:54:39
HELD	19/09/2016	17:54:47
ACTIONED	19/09/2016	18:01:28
ASSIGNED		
DISPATCHED	19/09/2016	19:43:46
AT SCENE	19/09/2016	20:02:04
CLEARED	20/09/2016	13:48:00
RESULTED		
DISPOSED	20/09/2016	14:15:13

----- Comments -----

AN ONLINE CRIME REPORTING FORM HAS BEEN RECEIVED	19/09/2016 17:58:23 5459	37	REMARKS
[REDACTED]	19/09/2016 17:58:24 5459	37	REMARKS
[REDACTED] REPORTED DAMAGE TO ROOF. REQUESTED ASSISTANCE FROM LANDLORD (NBBC) WHO RESPONSIBILITY IT IS TO REPAIR ETC. NBBC ARRANGE CONTRACTOR TO VISIT TO ACSSSESS AND ARRANGE WORK ON INSPECTION DAMAGE TO ROOF SKYLIGHT FOLLOWING WHAT APPEARS TO BE AN ATTEMPT TO BREAK IN TO THE PREMISES.	19/09/2016 17:58:40 5459	37	REMARKS
..	19/09/2016 17:58:46 5459	37	REMARKS
THIS WOULD HAVE HAPPENED BETWEEN 1930 15/09/16 AND 0900 19/09/16	19/09/2016 17:59:11 5459	37	REMARKS
..	19/09/2016 17:59:12 5459	37	REMARKS
WHILST ON SITE CONTRACTOR REPRESENTING NBBC WAS HARRASED AND THREATEND.	19/09/2016 17:59:23 5459	37	REMARKS
DAMAGE TO PROFILED PVCU ROOF SHEET	19/09/2016 17:59:28 5459	37	REMARKS
..	19/09/2016 17:59:46 5459	37	REMARKS
..	19/09/2016 17:59:51 5459	37	REMARKS
INCIDENT WAS REPORTED TO ME THIS MORNING. THE INCIEDENT FOLLOWS INCREASED TRAVELLER ACTIVITY WHICH ARE CURRENTLY CAMPED ON NBBC LAND IN SLINGSBY CLOSE	19/09/2016 18:00:13 5459	37	REMARKS
..	19/09/2016 18:00:17 5459	37	REMARKS
THERE IS NO DETAILS OF THE WORKER AT THE LOCATION	19/09/2016 18:01:14 5459	37	REMARKS
..	19/09/2016 18:01:15 5459	37	REMARKS
Transfer To OlNORTHERN From Workstation 37 Control	19/09/2016 18:01:29 5459	37	SYSTEM
Transfer Accepted At Workstation 31 For Control	19/09/2016 18:07:01 4458	31	SYSTEM
CTRL - ALL UNITS ARE COMMITTED. WILL RESOURCE WHEN ONE COMES FREE	19/09/2016 18:42:12 5208	50	REMARKS
PA405 MOBILISED BY DRAG/DROP	19/09/2016 19:43:46 5267	31	SYSTEM
Arrival time target not met	19/09/2016 19:44:17 SYSTEM	MASTER	REMARKS
WK-20160919-0310 PRINTED AT WORKSTATION:WAR100258 -> HP CLJ M553 - WM81955 (COLOUR)	19/09/2016 19:45:40 1311	WAR100258	SYSTEM
Reason for Print:PA 405	19/09/2016 19:45:40 1311	WAR100258	SYSTEM
PREVIOUS CALLS VIEWED [REDACTED]	19/09/2016 20:01:31 5208	50	SYSTEM
PA405 6 - AT SCENE/DEALING WITH INC.	19/09/2016 20:02:04 5267	31	SYSTEM
PA405- THERE IS NOONE HERE	19/09/2016 20:02:17 5267	31	REMARKS

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Incident Report / WK-20160919-0310 / WK-2016-0116268

AS THIS IS INDUSTRIAL UNITS, NOONE IS HERE TO TAKE DETAILS	19/09/2016 20:02:43 5267	31	REMARKS
***	19/09/2016 20:02:44 5267	31	REMARKS
PA405 2 - AVAILABLE, RESUMING PATROL	19/09/2016 20:04:56 5267	31	SYSTEM
***	19/09/2016 20:05:38 5267	31	REMARKS
CTRL- WILL DEFER FOR E/T TO ATTEND TO TAKE DETAILS	19/09/2016 20:05:49 5267	31	REMARKS
***	19/09/2016 20:05:50 5267	31	REMARKS
CALL CARD SUCCESSFULLY DEFERRED 20/09/2016 06:00:00 Workstation 31	19/09/2016 20:06:12 5267	31	SYSTEM
FOR E/T TO ATTEND	19/09/2016 20:06:12 5267	31	DEFER
CAD093: REACTIVATED AT MASTER	20/09/2016 06:00:34 SYSTEM	MASTER	SYSTEM
Transfer Accepted At Workstation 31 For Information	20/09/2016 06:42:52 4760	31	SYSTEM
Cross Referenced By Incident WK-20160920-0050	20/09/2016 07:51:37 5381	50	SYSTEM
Cross Referenced By Incident WK-20160920-0054	20/09/2016 08:00:19 4650	HQ131	SYSTEM
Cross Referenced By Incident WK-20160920-0074	20/09/2016 09:09:56 4735	10	SYSTEM
PA302 MOBILISED BY DRAG/DROP	20/09/2016 10:10:02 5381	50	SYSTEM
PA302 6 - AT SCENE/DEALING WITH INC.	20/09/2016 10:49:01 SYSTEM	ARLSERVER	SYSTEM
PA302 2 - AVAILABLE, RESUMING PATROL	20/09/2016 13:48:00 4760	31	SYSTEM
BASIC OFFENCE OUTLINE:	20/09/2016 14:14:58 4297	35	REMARKS
UNKNOWN OFFENDERS HAVE CLIMBED ONTO ROOF OF INDUSTRIAL UNIT AND MADE A HOLE IN THE CORRUGATED PLASTIC COVERING THE ROOF. NO ENTRY HAS BEEN MADE TO THE BUILDING AS FAR AS THE IP	20/09/2016 14:14:58 4297	35	REMARKS
S			
AWARE AND NOTHING HAS BEEN STOLEN. DAMAGE HAS BEEN CAUSED TO THE PLASTIC ROOF. ESTIMATED COST OF £500.,	20/09/2016 14:15:13 4297	35	DISPOSE
# Arrests # Cautions # Reports	20/09/2016 14:15:13 4297	35	DISPOSE
DISPOSAL CODE-: CR03.1	20/09/2016 14:15:13 4297	35	SYSTEM
ENGAGE TAG ADDED	20/09/2016 14:15:13 4297	35	DISPOSE
NSIR Qualifiers: OT1.1	20/09/2016 14:15:13 4297	35	DISPOSE
WK-20160919-0310 HAS BEEN DISPOSED OR DEFERRED	20/09/2016 21:37:59 6035	WAR80056	SYSTEM
ENGAGE TAG REMOVED	21/09/2016 12:50:07 1151	WAR100330	SYSTEM
WK-20160919-0310 PRINTED AT WORKSTATION:WAR100330 -> HP LJ P3015 -			
WAR100703 (B&W)	21/09/2016 12:50:07 1151	WAR100330	SYSTEM
Reason for Print:SNT	15/11/2018 08:54:04 5904	DTE05570	SYSTEM
Reason for Print:HH			

--- Relations ---

CALL CARD - XREF CALL	WK-20160920-0050 (N51J)	ASSOCIATED BY OPERATOR 5381
CALL CARD - XREF CALL	WK-20160920-0074 (N51J)	ASSOCIATED BY OPERATOR 4735
CALL CARD - XREF CALL	WK-20160920-0054 (N51J)	ASSOCIATED BY OPERATOR 4650
UNIFI -	23N5/32987E/16	

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Incident Report / WK-20160920-0050 / WK-2016-0116438

1806 1

20/09/2016 07:32:26 (DAMAGE) DAMAGE / PA302
Priority:(4) SCHEDULED SourceTEL
Disposal Codes (1-6):-CR12.1/ / / / /
Operator No:-6296 Scenario:-WARKS
Dispatcher No:-4760
Handling Unit:-PA302

Beat:-N51NUN N+B
RIAN51J (437572,290856)

Creator Wkst:-34
Owner Wkst:-50
Officer in case:-1825

----- Address Information -----

SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, CV116RP

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:
Address:

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

----- Date/Time Info. -----

INITIAL INPUT	20/09/2016	07:32:26
HELD	20/09/2016	07:32:26
NACTIONED	20/09/2016	07:35:29
ASSIGNED	20/09/2016	10:10:12
DISPATCHED	20/09/2016	13:48:04
AT SCENE	20/09/2016	13:48:05
CLEARED	20/09/2016	13:48:06
RESULTED		
DISPOSED	20/09/2016	13:48:24

----- Comments -----

Created from Shadow Incident	20/09/2016 07:32:26 6296	34	REMARKS
NPT Priority=. Vulnerable=. ETA given=.	20/09/2016 07:32:26 6296	34	SYSTEM
GEOBASE TAG ADDED	20/09/2016 07:32:31 6296	34	SYSTEM
NAME OF COMPANY:	20/09/2016 07:32:48 6296	34	REMARKS
**	20/09/2016 07:32:53 6296	34	REMARKS
**	20/09/2016 07:32:56 6296	34	REMARKS
DAMAGE TO SIGNS PULLED THE BANNERS OFF	20/09/2016 07:33:31 6296	34	REMARKS
**	20/09/2016 07:33:32 6296	34	REMARKS
NAILS LEFT IN THE ROAD - INF SWEEPING THEM UP	20/09/2016 07:34:03 6296	34	REMARKS
BELIEVES THIS IS DUE TO THE TRAVELLERS	20/09/2016 07:34:41 6296	34	REMARKS
CCTV.	20/09/2016 07:34:46 6296	34	REMARKS
**	20/09/2016 07:34:49 6296	34	REMARKS
VALUE OF SIGN £100	20/09/2016 07:36:18 6296	34	REMARKS
**	20/09/2016 07:36:19 6296	34	REMARKS
A VAN IS PARKED IN THE MIDDLE OF THE ROAD -	20/09/2016 07:37:28 6296	34	REMARKS
BLOCKING ENTRY TO THE ROAD			
**	20/09/2016 07:37:30 6296	34	REMARKS
SNT INFO TAG ADDED	20/09/2016 07:38:13 6296	34	SYSTEM
CH... CONTROL HAVE WE GOT ANYONE FREE	20/09/2016 07:38:59 6296	34	REMARKS
REGARDING THE VAN BLOCKING THE ROAD ACCESS			
**	20/09/2016 07:39:01 6296	34	REMARKS
Transfer To 01NORTHERN From Workstation 34	20/09/2016 07:39:06 6296	34	SYSTEM
Control			
# SCHEDULED - POLICE ATTENDANCE REQUIRED BUT	20/09/2016 07:39:27 6296	34	REMARKS
NOT P OR E			
**	20/09/2016 07:39:29 6296	34	REMARKS
Priority changed from RES WD to SCHEDULED -	20/09/2016 07:39:30 5381	50	SYSTEM
reason SITUATION UPDATE RCVD			
Person searched:	20/09/2016 07:39:38 6296	34	SYSTEM
CALLER	20/09/2016 07:39:58 6296	34	REMARKS
**	20/09/2016 07:40:01 6296	34	REMARKS
INF COULDN'T SEE THE VRN	20/09/2016 07:40:19 6296	34	REMARKS
**	20/09/2016 07:40:21 6296	34	REMARKS
Transfer Accepted At Workstation 50 For Control	20/09/2016 07:40:50 5381	50	SYSTEM
WK-20160920-0050 PRINT REQUESTED IN WEBSTORM	20/09/2016 07:44:32 5652		WEBSTORM01 SYSTEM
BY:-5652			
Cross Referenced To Incident WK-20160919-0310	20/09/2016 07:51:37 5381	50	SYSTEM
CNTRL - XREF MAY BE LINKED - LOCATION IS CLOSE	20/09/2016 07:52:00 5381	50	REMARKS
AND BOTH HAVE BEEN DAMAGED			
*	20/09/2016 07:52:04 5381	50	REMARKS
PA302 ASSIGNED TO INCIDENT	20/09/2016 10:10:12 5381	50	SYSTEM

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WARWICKSHIRE POLICE RESTRICTED

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Incident Report / WK-20160920-0050 / WK-2016-0116438

GEOBASE TAG REMOVED	20/09/2016 10:33:46 4356	WAR80539	SYSTEM
BASIC OFFENCE OUTLINE:	20/09/2016 13:47:41 4760	31	REMARKS
UNKNOWN OFFENDER(S) HAVE RIPPED A BANNER FROM	20/09/2016 13:47:41 4760	31	REMARKS
A GATE CAUSING IT TO RIP. THE OFFENCE HAPPENED			
BETWEEN MONDAY 19TH SEPTEMBER 1400HS AND			
TUESDAY 20TH AT 0630HRS. COST IS APPROX £200.			
ALSO THERE WAS EVIDENCE OF ANTI SOCIAL	20/09/2016 13:47:41 4760	31	REMARKS
BEHAVIOUR INVOLVING SCRAP TYRES BEING THROWN			
AROUND, A 'DEN' BEING MADE NEXT TO THE UNIT			
AND BOTTLES SMASHED ON THE FLOOR.,			
PA302 MOBILISED BY DRAG/DROP	20/09/2016 13:48:04 4760	31	SYSTEM
PA302 6 - AT SCENE/DEALING WITH INC.	20/09/2016 13:48:05 4760	31	SYSTEM
PA302 2 - AVAILABLE, RESUMING PATROL	20/09/2016 13:48:06 4760	31	SYSTEM
# Arrests # Cautions # Reports	20/09/2016 13:48:24 4760	31	DISPOSE
DISPOSAL CODE:- CR12.1	20/09/2016 13:48:24 4760	31	DISPOSE
ENGAGE TAG ADDED	20/09/2016 13:48:24 4760	31	SYSTEM
NSIR Qualifiers: OT1.1	20/09/2016 13:48:24 4760	31	DISPOSE
WK-20160920-0050 HAS BEEN DISPOSED OR DEFERRED	20/09/2016 13:48:24 4760	31	DISPOSE
SNT INFO TAG REMOVED	20/09/2016 21:39:04 6035	WAR80056	SYSTEM
ENGAGE TAG REMOVED	20/09/2016 21:39:09 6035	WAR80056	SYSTEM
WK-20160920-0050 PRINTED AT	21/09/2016 12:48:40 1151	WAR100330	SYSTEM
WORKSTATION:WAR100330 -> HP LJ P3015 -			
WAR100703 (B&W)			
Reason for Print:SNT	21/09/2016 12:48:40 1151	WAR100330	SYSTEM
Reason for Print:HH	15/11/2018 08:54:59 5904	DTE05570	SYSTEM

--- Relations ---
CALL CARD - XREF CALL
PERSON - CALLER

WK-20160919-0310 (N51J) ASSOCIATED BY OPERATOR 5381

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23N5/32986D/16

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Incident Report / WK-20160920-0054 / WK-2016-0116442

1808

20/09/2016 07:59:24 (SUS CIRCS) SUSPICIOUS CIRCUMSTANCES
Priority: (5) RES WD SourceTEL
Disposal Codes (1-6): PS08.4 / / / /
Operator No: 4650 Scenario: WARKS
Dispatcher No:-
Handling Unit:-

Beat: N51NUN N+B
RIAN51J (437430,290928)

Creator Wkst: HQ131
Owner Wkst: HQ131
Officer in case: 4650

----- Address Information -----

UNIT
SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, CV116RP

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:
Address:-

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-
Email:-

----- Date/Time Info. -----

INITIAL INPUT	20/09/2016	07:59:24
HELD	20/09/2016	07:59:52
UNACTIONED	20/09/2016	08:02:41
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	20/09/2016	08:04:14

----- Comments -----

Cross Referenced To Incident WK-20160919-0310	20/09/2016 08:00:19 4650	HQ131	SYSTEM
PREVIOUS CALLS VIEWED	20/09/2016 08:00:38 4650	HQ131	SYSTEM
INF IS REPORTING AT 2AM THIS MORNING HIS SECURITY CAMERA WAS MOVED - APPEARS IT WAS PUSHED WITH A STICK TO FACE THE WALL	20/09/2016 08:01:25 4650	HQ131	REMARKS
THERE IS NOTHING CAUGHT ON THE CCTV FOOTAGE	20/09/2016 08:01:26 4650	HQ131	REMARKS
NOTHING DAMAGED OR TAKEN - JUST A MOVED CAMERA	20/09/2016 08:01:39 4650	HQ131	REMARKS
Person searched:	20/09/2016 08:01:40 4650	HQ131	REMARKS
CALLER	20/09/2016 08:01:50 4650	HQ131	REMARKS
Comments viewed via auto pop-up, Location	20/09/2016 08:01:51 4650	HQ131	REMARKS
Comments	20/09/2016 08:02:00 4650	HQ131	SYSTEM
RESWD - POLICE ATTENDANCE NOT REQUIRED	20/09/2016 08:02:20 4650	HQ131	REMARKS
SNT INFO TAG ADDED	20/09/2016 08:02:32 4650	HQ131	REMARKS
# Arrests # Cautions # Reports	20/09/2016 08:02:35 4650	HQ131	REMARKS
DISPOSAL CODE: PS08.4	20/09/2016 08:02:43 4650	HQ131	SYSTEM
NSIR Qualifiers: OT1.1	20/09/2016 08:02:52 4650	HQ131	REMARKS
WK-20160920-0054 HAS BEEN DISPOSED OR DEFERRED	20/09/2016 08:04:02 4650	HQ131	REMARKS
WORKSTATION: WAR100330 -> HP LJ P3015 -	20/09/2016 08:04:13 4650	HQ131	SYSTEM
WAR100703 (B&W)	20/09/2016 08:04:13 4650	HQ131	DISPOSE
Reason for Print: SNT	20/09/2016 08:04:14 4650	HQ131	DISPOSE
Reason for Print: HH	20/09/2016 08:04:14 4650	HQ131	DISPOSE
	21/09/2016 12:48:25 1151	WAR100330	SYSTEM
	15/11/2018 08:56:29 5904	DTE05570	SYSTEM

----- Relations -----

CALL CARD - XREF CALL
PERSON - CALLER

WK-20160919-0310 (N51J) ASSOCIATED BY OPERATOR 4650

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Incident Report / WK-20160920-0074 / WK-2016-0116462

1809

20/09/2016 09:02:12 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / PA302
Priority:(4) SCHEDULED SourceTEL
Disposal Codes (1-6):-AS22.1/ / / / /
Operator No:-4735 Scenario:-WARKS
Dispatcher No:-4297
Handling Unit:-PA302

Beat:-N51NUN N+B
RIAN51J (437479,290833)

Creator Wkst:-10
Owner Wkst:-31
Officer in case:-1825

---- Address Information ----

UNIT
SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, CV116RP

Proximity:-
[X] Valid Gazetteer:-

---- Complainant Details ----

Surname/First Name
Address:

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:- ,
Email:-

---- Date/Time Info. ----

INITIAL INPUT	20/09/2016	09:02:12
HELD	20/09/2016	09:03:00
UNACTIONED	20/09/2016	09:09:42
ASSIGNED	20/09/2016	10:10:20
DISPATCHED	20/09/2016	14:30:22
AT SCENE	20/09/2016	14:30:23
CLEARED	20/09/2016	14:30:24
RESULTED		
DISPOSED	20/09/2016	14:31:06

---- Comments ----

INF COMPLAINING ABOUT THE TRAVELLERS IN SLINGSBY CLOSE. [REDACTED] ETONE SERVICE CENTRE AND THEY ARE ALL OVER HIS CAR PARK, CUSTOMERS CANNOT GET IN AND THEY DARENT OPEN UP.	20/09/2016 09:08:44 4735	10	REMARKS
A COUPLE OF OTHER PREMISES ARE THE SAME.	20/09/2016 09:09:04 4735	10	REMARKS
HE APPRECIATES WE CANNOT JUST MOVE THEM ON BUT ASKING IF WE COULD ATT TO JUST PROVIDE A PRESENCE.	20/09/2016 09:09:35 4735	10	REMARKS
Transfer To O1NORTHERN From Workstation 10 Control	20/09/2016 09:09:48 4735	10	SYSTEM
Cross Referenced To Incident WK-20160919-0310	20/09/2016 09:09:56 4735	10	SYSTEM
Transfer Accepted At Workstation 31 For Control	20/09/2016 09:10:13 4760	31	SYSTEM
CH - FURTHER CALL REPORTING A BLACK FORD FOCUS PART VRM BK15 OCCS ARE DRINKING ALCOHOL IN HE VEHICLE AND THEY ARE BLOCKING THREE UNITS PREVENTING STAFF GETTING IN. THIS IS BY ETONE CENTRE. STAFF DO NOT WANT TO APPROACH THEM.	20/09/2016 09:11:27 4735	10	REMARKS
INF IS [REDACTED]	20/09/2016 09:11:33 4735	10	REMARKS
	20/09/2016 09:11:59 4735	10	REMARKS
	20/09/2016 09:12:12 4735	10	REMARKS
Transfer To O1NORTHERN From Workstation 10 Control	20/09/2016 09:12:15 4735	10	SYSTEM
Transfer Accepted At Workstation 31 For Control	20/09/2016 09:12:23 4760	31	SYSTEM
PA302 ASSIGNED TO INCIDENT	20/09/2016 10:10:20 5381	50	SYSTEM
PA302 MOBILISED FROM ASSIGNMENT FORM	20/09/2016 14:30:22 4297	35	SYSTEM
PA302 6 - AT SCENE/DEALING WITH INC.	20/09/2016 14:30:23 4297	35	SYSTEM
PA302 2 - AVAILABLE, RESUMING PATROL	20/09/2016 14:30:24 4297	35	SYSTEM
PA302 - VEHICLE WAS M MOVED LOG CAN BE CLOSED	20/09/2016 14:30:40 4297	35	REMARKS
	20/09/2016 14:30:41 4297	35	REMARKS
# Arrests # Cautions # Reports	20/09/2016 14:31:06 4297	35	DISPOSE
DISPOSAL CODE:- AS22.1	20/09/2016 14:31:06 4297	35	DISPOSE
NSIR Qualifiers: HD2.6	20/09/2016 14:31:06 4297	35	DISPOSE
WK-20160920-0074 HAS BEEN DISPOSED OR DEFERRED	20/09/2016 14:31:06 4297	35	DISPOSE
Cross Referenced By Incident WK-20160921-0131	21/09/2016 11:46:49 4085	31	SYSTEM
WK-20160920-0074 PRINTED AT WORKSTATION:WAR100330 -> HP LJ P3015 - WAR100703 (B&W)	21/09/2016 12:48:08 1151	WAR100330	SYSTEM
Reason for Print:SNT	21/09/2016 12:48:08 1151	WAR100330	SYSTEM
Reason for Print:HH	15/11/2018 08:57:07 5904	DTE05570	SYSTEM

---- Relations ----

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Incident Report / WK-20160920-0074 / WK-2016-0116462

1810

CALL CARD - XREF CALL	WK-20160921-0131 (N51J)	ASSOCIATED BY OPERATOR 4085
CALL CARD - XREF CALL	WK-20160919-0310 (N51J)	ASSOCIATED BY OPERATOR 4735

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Incident Report / WK-20160920-0177 / WK-2016-0116565

PAGE 1
1811

20/09/2016 13:37:22 (DAMAGE) DAMAGE / PA302
Priority: (4) SCHEDULED Source: RADIO
Disposal Codes (1-6): -CR15.1 / / / / /
Operator No: -4297 Scenario: -WARKS
Dispatcher No: -
Handling Unit: -

Beat: -N51NUN N+B
RIAN51J (437578,290857)

Creator Wkst: -35
Owner Wkst: -35
Officer in case: -4760

---- Address Information ----

SLINGSBY CL #UNIT [REDACTED] ATTLEBOROUGH FIELDS, NUNEATON, CV116RP

Proximity: -
[X] Valid Gazetteer: -

---- Complainant Details ----

Surname/First Name: [REDACTED]
Address: -PA302,

DOB / Sex / Ethnicity: -, ,
Email: -

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

---- Date/Time Info. ----

INITIAL INPUT	20/09/2016	13:37:22
HELD	20/09/2016	13:37:53
UNACTIONED	20/09/2016	13:38:32
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	20/09/2016	14:20:06

---- Comments ----

WHILST ATTENDING THE LOCATION [REDACTED] THAT A WINDOW OF HIS VEHICLE THAT WAS PARKED AT THE UNIT WAS SMASHED. VEHICLE HAD REAR OFFSIDE BOOT WINDOW SMASHED IN A HYUNDAI SANTA FE YN04UKH. COST APPROX £200. OFFENCE HAPPENED BETWEEN THURS 15TH SEPT AT 1700HRS AND MON 19TH AT 0800HRS	20/09/2016 13:43:26 1825	WAR90125	REMARKS
BASIC OFFENCE OUTLINE: UNKNOWN OFFENDERS HAVE SMASHED A SMALL BOOT SIDE WINDOW OF A HYUNDAI SANTA FE VRM YN04UKH CAUSING APPROX £200 OF DAMAGE.,	20/09/2016 13:43:26 1825	WAR90125	REMARKS
# Arrests # Cautions # Reports	20/09/2016 13:44:21 1825	WAR90125	REMARKS
DISPOSAL CODE: - CR15.1	20/09/2016 14:19:35 4760	31	REMARKS
NSIR Qualifiers: OT1.1	20/09/2016 14:19:35 4760	31	REMARKS
WK-20160920-0177 HAS BEEN DISPOSED OR DEFERRED	20/09/2016 14:20:06 4760	31	DISPOSE
WK-20160920-0177 PRINTED AT	20/09/2016 14:20:06 4760	31	DISPOSE
WORKSTATION: WAR100330 -> HP LJ P3015 -	20/09/2016 14:20:06 4760	31	DISPOSE
WAR100703 (B&W)	20/09/2016 14:20:06 4760	31	DISPOSE
Reason for Print: SNT	21/09/2016 12:47:48 1151	WAR100330	SYSTEM
WK-20160920-0177 PRINT REQUESTED IN WEBSTORM	21/09/2016 12:47:48 1151	WAR100330	SYSTEM
BY: -5452	24/09/2016 18:30:11 5452	WEBSTORM01	SYSTEM
Reason for Print: HH	15/11/2018 08:57:54 5904	DTE05570	SYSTEM

---- Relations ----

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WARWICKSHIRE POLICE RECORDS

Incident Report / WK-20160920-0183 / WK-2016-0116571

1812

20/09/2016 13:47:28 (ASB) ANTI SOCIAL BEHAVIOUR
Priority:(4) SCHEDULED SourceTEL
Disposal Codes (1-6):-AS22.1/ / / / /
Operator No:-5378 Scenario:-WARKS
Dispatcher No:-
Handling Unit:-

Beat:-N51NUN N+B
RIAN51J (437549,290852)

Creator Wkst:-30
Owner Wkst:-30
Officer in case:-5378

---- Address Information ----

UNIT
SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, CV116RP

Proximity:-ONE STOP BIKES
[X] Valid Gazetteer:-

---- Complainant Details ----

Surname/First Name:
Address:-OWNER,

DOB / Sex / Ethnicity:-, ,
Email:-

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

---- Date/Time Info. ----

INITIAL INPUT	20/09/2016	13:47:28
HELD	20/09/2016	13:48:12
UNACTIONED	20/09/2016	13:52:31
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	20/09/2016	13:55:05

---- Comments ----

SNT INFO TAG ADDED	20/09/2016 13:50:01	5378	30	SYSTEM
INF HAS SAID THAT THERE ARE TRAVELLERS AT THE	20/09/2016 13:50:34	5378	30	REMARKS
BACK OF THE SHOP WHERE SOMEONE HAS GONE FOR A				
POO				
AND HAS BEEN SMASHING BOTTLES ALL OVER THE	20/09/2016 13:50:44	5378	30	REMARKS
PLACE				
	20/09/2016 13:50:44	5378	30	REMARKS
	20/09/2016 13:50:54	5378	30	REMARKS
INC NUMBER GIVEN	20/09/2016 13:50:55	5378	30	REMARKS
	20/09/2016 13:51:09	5378	30	SYSTEM
PREVIOUS CALLS VIEWED				
ASB TAG ADDED	20/09/2016 13:52:31	5378	30	SYSTEM
QUESTION: Q.SET started	20/09/2016 13:52:36	5378	30	QUESTION
ANSWER: YES	20/09/2016 13:52:36	5378	30	ANSWER
QUESTION: Circumstances:	20/09/2016 13:53:11	5378	30	QUESTION
ANSWER: THERE IS HUMAN POO AT THE BACK OF	20/09/2016 13:53:11	5378	30	ANSWER
INFORMANTS SHOP - SHE SAID THIS IS AN ON GOING				
PROBLEM WITH THE TRAVELLERS BEING NEAR THE SHOP				
QUESTION: Have you or your family had problems	20/09/2016 13:53:18	5378	30	QUESTION
like this before?				
ANSWER: YES	20/09/2016 13:53:18	5378	30	ANSWER
ANSWER: ON GOING	20/09/2016 13:53:18	5378	30	ANSWER
QUESTION: How often and are they related to	20/09/2016 13:53:27	5378	30	QUESTION
this incident?				
ANSWER: TRAVELLERS NOT ALWAYS THE SAME PEOPLE	20/09/2016 13:53:27	5378	30	ANSWER
QUESTION: Do you know who is involved, their	20/09/2016 13:53:33	5378	30	QUESTION
names and where they live? If not provide				
numbers and descriptions.				
ANSWER: UNKNOWN	20/09/2016 13:53:33	5378	30	ANSWER
QUESTION: Why is it happening?	20/09/2016 13:53:36	5378	30	QUESTION
ANSWER: UNKNOWN	20/09/2016 13:53:36	5378	30	ANSWER
QUESTION: How have you or your family been	20/09/2016 13:54:09	5378	30	QUESTION
affected by this?				
ANSWER: INF SAID SHES REALLY HAD ENOUGH IT IS	20/09/2016 13:54:09	5378	30	ANSWER
DISCUSTING HAVING TO SEE THIS ALL THE TIME.				
THERE ARE FLIES EVERYWHERE AND ITS REALLY				
FRUSTRATING HER				
QUESTION: Anyone who can support you?	20/09/2016 13:54:11	5378	30	QUESTION
ANSWER: POLICE	20/09/2016 13:54:11	5378	30	ANSWER
QUESTION: Have you been in contact with any	20/09/2016 13:54:40	5378	30	QUESTION
other agencies? If YES who?				

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Incident Report / WK-20160920-0183 / WK-2016-0116571

1813

ANSWER: INF HAS BEEN TRYING TO CONTACT THE ENVIRONMENTAL HEALTH BUT SHE SAID THAT THEY WONT DO ANYTHING ANYWAY SO SHES NOT GOING TO BOTHER.	20/09/2016 13:54:40 5378	30	ANSWER
Final question (Qset finished?) automatically answered	20/09/2016 13:54:40 5378	30	QUESTION
	20/09/2016 13:54:43 5378	30	REMARKS
# SCHEDULED - POLICE ATTENDANCE REQUIRED BUT NOT P OR E	20/09/2016 13:54:46 5378	30	REMARKS
	20/09/2016 13:54:47 5378	30	REMARKS
# Arrests # Cautions # Reports	20/09/2016 13:55:05 5378	30	DISPOSE
DISPOSAL CODE-: AS22.1	20/09/2016 13:55:05 5378	30	DISPOSE
NSIR Qualifiers: OT1.1	20/09/2016 13:55:05 5378	30	DISPOSE
WK-20160920-0183 HAS BEEN DISPOSED OR DEFERRED	20/09/2016 13:55:05 5378	30	DISPOSE
WK-20160920-0183 PRINTED AT	21/09/2016 12:47:31 1151	WAR100330	SYSTEM
WORKSTATION:WAR100330 -> HP LJ P3015 -			
WAR100703 (B&W)			
Reason for Print:SNT	21/09/2016 12:47:31 1151	WAR100330	SYSTEM
Reason for Print:HH	15/11/2018 08:58:58 5904	DTE05570	SYSTEM

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WARWICKSHIRE POLICE RESTRICTED

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Incident Report / WK-20160920-0292 / WK-2016-0116680

20/09/2016 17:22:42 (ASB) ANTI SOCIAL BEHAVIOUR
Priority: (5) RES WD Source: TEL
Disposal Codes (1-6): -AS22.1/ / / / /
Operator No: -5438 Scenario: -WARKS
Dispatcher No: -
Handling Unit: -

Beat: -N51NUN N+B
RIAN51J (437498,290839)

Creator Wkst: -13
Owner Wkst: -13
Officer in case: -5438

----- Address Information -----

COOPERS DIAMOND DRILLING LTD, UNIT
SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, [REDACTED]

Proximity: -
[X] Valid Gazetteer: -

----- Complainant Details -----

Surname/First Name: [REDACTED]
Address: [REDACTED]
OWNER
DOB / Sex / Ethnicity: -, ,
Email: -

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

----- Date/Time Info. -----

INITIAL INPUT	20/09/2016	17:22:42
HELD	20/09/2016	17:22:42
UNACTIONED	20/09/2016	17:22:46
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	20/09/2016	17:26:22

----- Comments -----

Created from Shadow Incident	20/09/2016 17:22:42 5438	13	REMARKS
NPT Priority=. Vulnerable=. ETA given=.	20/09/2016 17:22:42 5438	13	SYSTEM
QUESTION: Q.SET started	20/09/2016 17:22:48 5438	13	QUESTION
ANSWER: YES	20/09/2016 17:22:48 5438	13	ANSWER
QUESTION: Circumstances:	20/09/2016 17:23:07 5438	13	QUESTION
ANSWER: INF CALLING TO REPORT A PROBLEM WITH THE TRAVELLERS CURRENTLY ON SITE HERE	20/09/2016 17:23:07 5438	13	ANSWER
INF [REDACTED] AND WHEN GOING THERE TO PICK UP TOOLS HE WAS GIVEN A LOAD OF ABUSE BY A MALE	20/09/2016 17:23:33 5438	13	REMARKS
*	20/09/2016 17:23:34 5438	13	REMARKS
HE IS UNSURE WHAT HE SAID AND INF JUST WALKED OFF AWAY FROM HIM	20/09/2016 17:23:50 5438	13	REMARKS
*	20/09/2016 17:23:51 5438	13	REMARKS
QUESTION: Have you or your family had problems like this before?	20/09/2016 17:24:05 5438	13	QUESTION
ANSWER: NO	20/09/2016 17:24:05 5438	13	ANSWER
QUESTION: Do you know who is involved, their names and where they live? If not provide numbers and descriptions.	20/09/2016 17:24:19 5438	13	QUESTION
ANSWER: DESC- W/M, STOCKY BUILD, BLACK HAIR, PINK T-SHIRT	20/09/2016 17:24:19 5438	13	ANSWER
QUESTION: Why is it happening?	20/09/2016 17:24:22 5438	13	QUESTION
ANSWER: N/A	20/09/2016 17:24:22 5438	13	ANSWER
QUESTION: How have you or your family been affected by this?	20/09/2016 17:24:39 5438	13	QUESTION
ANSWER: CONCERNED FOR HIS BUSINESS AS THEY ARE SET UP ON THE INDUSTRIAL ESTATE	20/09/2016 17:24:39 5438	13	ANSWER
QUESTION: Anyone who can support you?	20/09/2016 17:24:42 5438	13	QUESTION
ANSWER: POLICE	20/09/2016 17:24:42 5438	13	ANSWER
QUESTION: Have you been in contact with any other agencies? If YES who?	20/09/2016 17:24:44 5438	13	QUESTION
ANSWER: NO	20/09/2016 17:24:44 5438	13	ANSWER
Final question (Qset finished?) automatically answered	20/09/2016 17:24:44 5438	13	QUESTION
*	20/09/2016 17:24:47 5438	13	REMARKS
INF STATES THERE WAS AN OFFICER THERE EARLIER SPEAKING TO THESE MALES BUT HE WAS APPROACHED AFTER THE OFFICER LEFT	20/09/2016 17:25:08 5438	13	REMARKS
*	20/09/2016 17:25:09 5438	13	REMARKS
INF WOULD LIKE TO SPEAK WITH AN OFFICER ABOUT THIS BUT DOES NOT WANT THEM TURNING UP AT HIS	20/09/2016 17:25:47 5438	13	REMARKS

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15/11/2018
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WARWICKSHIRE POLICE RESTRICTED

1815

Incident Report / WK-20160920-0292 / WK-2016-0116680

UNIT AS HE IS WORRIED ABOUT REPURCUSSIONS

20/09/2016 17:25:48 5438

13

REMARKS

CAN SNT GIVE HIM A CALL PLEASE?

20/09/2016 17:25:55 5438

13

REMARKS

20/09/2016 17:25:57 5438

13

REMARKS

20/09/2016 17:26:01 5438

13

SYSTEM

20/09/2016 17:26:04 5438

13

SYSTEM

20/09/2016 17:26:11 5438

13

REMARKS

20/09/2016 17:26:14 5438

13

REMARKS

20/09/2016 17:26:22 5438

13

DISPOSE

20/09/2016 17:26:22 5438

13

DISPOSE

20/09/2016 17:26:22 5438

13

DISPOSE

20/09/2016 21:39:54 6035

13

DISPOSE

20/09/2016 21:39:55 6035

WAR80056

SYSTEM

21/09/2016 12:47:16 1151

WAR80056

SYSTEM

21/09/2016 12:47:16 1151

WAR100330

SYSTEM

21/09/2016 12:47:16 1151

WAR100330

SYSTEM

15/11/2018 08:59:48 5904

DTE05570

SYSTEM

Reason for Print:SNT

Reason for Print:HH

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15/11/2018
09:00:53
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Incident Report / WK-20160921-0131 / WK-2016-0116981

1816

21/09/2016 11:39:18 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / BW50/NE50
Priority:(5) RES WD SourceTEL
Disposal Codes (1-6):-AS22.1/ / / / /
Operator No:-5660 Scenario:-MARKS
Dispatcher No:-5141
Handling Unit:-BW40

Beat:-N51NUN N+B
RIAN51J (437457,290869)

Creator Wkst:-14
Owner Wkst:-50
Officer in case:-4085

---- Address Information ----

M & O'S, UNIT
SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON, [REDACTED]

Proximity:-
[X] Valid Gazetteer:-

---- Complainant Details ----

Surname/First Name:- [REDACTED]
Address:- [REDACTED]

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:- ,
Email:-

---- Date/Time Info. ----

INITIAL INPUT	21/09/2016	11:39:18
HELD	21/09/2016	11:40:34
UNACTIONED	21/09/2016	11:41:45
ASSIGNED		
DISPATCHED	21/09/2016	13:22:06
AT SCENE	21/09/2016	13:22:10
CLEARED	21/09/2016	15:12:12
RESULTED		
DISPOSED	21/09/2016	15:12:12

---- Comments ----

INF SAYS THERE ARE TRAVELLERS HERE IN THE CAR PARK	21/09/2016 11:42:15	5660	14	REMARKS
*	21/09/2016 11:42:17	5660	14	REMARKS
APPROX 14 CARAVANS	21/09/2016 11:42:24	5660	14	REMARKS
*	21/09/2016 11:42:25	5660	14	REMARKS
THEY HAVE BEEN ON THE NEWS AND HAVE NOW BEEN THREATENED BY THE TRAVELLERS ABOUT THIS	21/09/2016 11:42:42	5660	14	REMARKS
*	21/09/2016 11:42:43	5660	14	REMARKS
INF IS A LITTLE WEARY OF HAVING OFFICERS THERE AS THIS MAY MAKE THINGS WORSE	21/09/2016 11:43:02	5660	14	REMARKS
*	21/09/2016 11:43:03	5660	14	REMARKS
Transfer To OlNORTHERN From Workstation 14 Control	21/09/2016 11:44:23	5660	14	SYSTEM
# PRIORITY - FORCE POLICY FOR THIS CALL TYPE	21/09/2016 11:44:28	5660	14	REMARKS
Person searched: [REDACTED]	21/09/2016 11:44:37	5660	14	SYSTEM
[REDACTED]	21/09/2016 11:44:46	5660	14	REMARKS
[REDACTED]	21/09/2016 11:44:54	5660	14	SYSTEM
SNT INFO TAG ADDED	21/09/2016 11:44:59	4085	31	REMARKS
ALREADY AWARE OF THE TRAVELLERS	21/09/2016 11:45:30	5660	14	REMARKS
INF SAYS HE IS ON A PUSHBIKE AND IS MORE CONCERNED ABOUT GETTING TO AND FROM WORK				
*	21/09/2016 11:45:33	5660	14	REMARKS
Transfer Accepted At Workstation 31 For Control	21/09/2016 11:45:53	4085	31	SYSTEM
Transfer To 14 From Workstation 31 Control	21/09/2016 11:46:02	4085	31	SYSTEM
Cross Referenced To Incident WK-20160920-0074	21/09/2016 11:46:49	4085	31	SYSTEM
Priority changed from PRIORITY to RES WD - reason SITUATION UPDATE RCVD	21/09/2016 11:47:10	4085	31	SYSTEM
DUPLICATE	21/09/2016 11:47:10	4085	31	SYSTEM
TRANSFERS CLEARED ON DISPOSAL: 14(CONTROL)	21/09/2016 11:47:19	4085	31	REMARKS
# Arrests # Cautions # Reports	21/09/2016 11:47:19	4085	31	DISPOSE
DISPOSAL CODE:- AD06.1	21/09/2016 11:47:19	4085	31	DISPOSE
BRIGN TAG ADDED	21/09/2016 11:47:19	4085	31	SYSTEM
NSIR Qualifiers: OT1.1	21/09/2016 11:47:19	4085	31	DISPOSE
WK-20160921-0131 HAS BEEN DISPOSED OR DEFERRED	21/09/2016 11:47:19	4085	31	DISPOSE
WK-20160921-0131 PRINTED AT	21/09/2016 12:49:16	1151	WAR100330	SYSTEM
WORKSTATION:WAR100330 -> HP LJ P3015 -				
WAR100703 (B&W)	21/09/2016 12:49:16	1151	WAR100330	SYSTEM
Reason for Print:SNT	21/09/2016 13:20:19	5141	50	SYSTEM
Previous Result Codes:-AD06.1	21/09/2016 13:20:19	5141	50	SYSTEM
QUALIFIERS WERE: OT1.1	21/09/2016 13:20:20	5141	50	SYSTEM
BRIGN TAG REMOVED	21/09/2016 13:20:20	5141	50	SYSTEM
CAD093: REACTIVATED AT 50				

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Incident Report / WK-20160921-0131 / WK-2016-0116981

1817

PREVIOUS CALLS VIEWED	21/09/2016 13:20:36 4290	42	SYSTEM
Transfer Accepted At Workstation 50 For Information	21/09/2016 13:21:51 5141	50	SYSTEM
BW40 MOBILISED BY DRAG/DROP	21/09/2016 13:22:06 5141	50	SYSTEM
BW40 6 - AT SCENE/DEALING WITH INC.	21/09/2016 13:22:10 5141	50	SYSTEM
NE50 MOBILISED BY DRAG/DROP	21/09/2016 13:22:18 5141	50	SYSTEM
NE50 6 - AT SCENE/DEALING WITH INC.	21/09/2016 13:22:20 5141	50	SYSTEM
BW40: ASSISTING COUNCIL SERVE NOTICES	21/09/2016 13:22:36 5141	50	REMARKS
NE50 - NOTICES SERVED	21/09/2016 15:11:56 5141	50	REMARKS
# Arrests # Cautions # Reports	21/09/2016 15:12:12 5141	50	DISPOSE
DISPOSAL CODE-: AS22.1	21/09/2016 15:12:12 5141	50	DISPOSE
NSIR Qualifiers: HD2.6	21/09/2016 15:12:12 5141	50	DISPOSE
WK-20160921-0131 HAS BEEN DISPOSED OR DEFERRED	21/09/2016 15:12:12 5141	50	DISPOSE
Reason for Print:HH	15/11/2018 09:00:53 5904	DTE05570	SYSTEM

---- Relations ----
CALL CARD - XREF CALL
PERSON - CALLER

WK-20160920-0074 (N51J) ASSOCIATED BY OPERATOR 4085

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Incident Report / WK-20160921-0275 / WK-2016-0117125

21/09/2016 16:27:27 (ASB) ANTI SOCIAL BEHAVIOUR / NS63
Priority:(4) SCHEDULED SourceTEL
Disposal Codes (1-6):-AS22.1/ / / / /
Operator No:-5659 Scenario:-WARKS
Dispatcher No:-5141
Handling Unit:-NS63

Beat:-NS1NUN N+B
RIAN51J (437500,290883)

Creator Wkst:-47
Owner Wkst:-50
Officer in case:-6142

----- Address Information -----

Approx Location
9999 SLINGSBY CL, ATTLEBOROUGH FIELDS, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:
Address:-

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:- ,
Email:-

----- Date/Time Info. -----

INITIAL INPUT	21/09/2016	16:27:27
HELD	21/09/2016	16:27:41
NACTIONED	21/09/2016	16:31:52
ASSIGNED		
DISPATCHED	21/09/2016	16:57:41
AT SCENE	21/09/2016	17:31:41
CLEARED	21/09/2016	17:34:21
RESULTED		
DISPOSED	21/09/2016	17:34:21

----- Comments -----

TRAVELLERS ON THE INDUSTRIAL ESTATE	21/09/2016 16:28:11	5659	47	REMARKS
/	21/09/2016 16:28:13	5659	47	REMARKS
ATTLEBOROUGH FIELDS INDUSTRIAL ESTATE	21/09/2016 16:28:33	5659	47	REMARKS
/	21/09/2016 16:28:33	5659	47	REMARKS
TRAVELLERS ARE KICKING FOOTBALLS AT CAMERAS	21/09/2016 16:29:08	5659	47	REMARKS
ON THE INDUSTRIAL ESTATE				
/	21/09/2016 16:30:00	5659	47	REMARKS
4 YOUNG MALES AND FEMALES	21/09/2016 16:30:36	5659	47	REMARKS
/	21/09/2016 16:30:38	5659	47	REMARKS
KICKING BALL AT INFS CAR ASWELL	21/09/2016 16:30:45	5659	47	REMARKS
/	21/09/2016 16:31:20	5659	47	REMARKS
INF HAS CAMERA FOOTAGE OF THEM DOING THIS	21/09/2016 16:31:27	5659	47	REMARKS
/	21/09/2016 16:31:38	5659	47	REMARKS
4 SCHEDULED - POLICE ATTENDANCE REQUIRED BUT	21/09/2016 16:31:41	5659	47	REMARKS
NOT P OR E				
SNT INFO TAG ADDED	21/09/2016 16:31:47	5659	47	SYSTEM
SB TAG ADDED	21/09/2016 16:31:52	5659	47	SYSTEM
Transfer To 01NORTHERN From Workstation 47	21/09/2016 16:31:56	5659	47	SYSTEM
Control				
QUESTION: Q.SET started	21/09/2016 16:32:01	5659	47	QUESTION
ANSWER: NO	21/09/2016 16:32:01	5659	47	ANSWER
Transfer Accepted At Workstation 50 For Control	21/09/2016 16:32:34	5141	50	SYSTEM
QUESTION: Circumstances:	21/09/2016 16:32:42	5659	47	QUESTION
ANSWER: THERE ARE TRAVELLER PARKED AT THE	21/09/2016 16:32:42	5659	47	ANSWER
INDUSTRIAL EST WHICH POLICE ARE ALREADY AWARE				
OF HOWEVER NOW THERE ARE 4 YOUTHS KICKING A				
FOOTBALL AT MY CAR AND AT THE CAMERAS				
QUESTION: Have you or your family had problems	21/09/2016 16:32:48	5659	47	QUESTION
like this before?				
ANSWER: NO	21/09/2016 16:32:48	5659	47	ANSWER
QUESTION: Do you know who is involved, their	21/09/2016 16:32:51	5659	47	QUESTION
names and where they live? If not provide				
numbers and descriptions.				
ANSWER: UNSURE	21/09/2016 16:32:51	5659	47	ANSWER
QUESTION: Why is it happening?	21/09/2016 16:32:56	5659	47	QUESTION
ANSWER: UNSURE	21/09/2016 16:32:56	5659	47	ANSWER
QUESTION: How have you or your family been	21/09/2016 16:33:02	5659	47	QUESTION
affected by this?				
ANSWER: CONCERNED, UPSET	21/09/2016 16:33:02	5659	47	ANSWER
QUESTION: Anyone who can support you?	21/09/2016 16:33:04	5659	47	QUESTION
ANSWER: NO	21/09/2016 16:33:04	5659	47	ANSWER

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Incident Report / WK-20160921-0275 / WK-2016-0117125

QUESTION: Have you been in contact with any other agencies? If YES who?	21/09/2016 16:33:05 5659	47	QUESTION
ANSWER: NO	21/09/2016 16:33:05 5659	47	ANSWER
Final question (Qset finished?) automatically answered	21/09/2016 16:33:05 5659	47	QUESTION
*****	21/09/2016 16:46:30 5321	14	REMARKS
CH - FURTHER CALL REPORTING TRAVLLERS HAVE PARKED THERE VEHS BY UNIT 20 AT THE REAR	21/09/2016 16:46:46 5321	14	REMARKS
THIS IS BLOCKING ACCESS TO THE UNIT	21/09/2016 16:46:51 5321	14	REMARKS
WORKERS CAN NOT GET THEIR MACINERY IN AND OUT	21/09/2016 16:47:01 5321	14	REMARKS
Transfer To 01NORTHERN From Workstation 14 Control	21/09/2016 16:47:24 5321	14	SYSTEM
Transfer Accepted At Workstation 50 For Control	21/09/2016 16:49:17 5141	50	SYSTEM
ALL UNITS CURRENTLY COMMITTED	21/09/2016 16:57:05 5141	50	REMARKS
NS63 MOBILISED BY DRAG/DROP	21/09/2016 16:57:41 5141	50	SYSTEM
NS63 6 - AT SCENE/DEALING WITH INC.	21/09/2016 17:31:41 SYSTEM	ARLSERVER	SYSTEM
NS63 - ALL CLEAR HERE, NO TRAVELLERS	21/09/2016 17:34:08 5141	50	REMARKS
# Arrests # Cautions # Reports	21/09/2016 17:34:20 5141	50	DISPOSE
DISPOSAL CODE:- AS22.1	21/09/2016 17:34:20 5141	50	DISPOSE
NSIR Qualifiers: OT1.1	21/09/2016 17:34:20 5141	50	DISPOSE
WK-20160921-0275 HAS BEEN DISPOSED OR DEFERRED	21/09/2016 17:34:21 5141	50	DISPOSE
Reason for Print:HH	15/11/2018 09:01:46 5904	DTE05570	SYSTEM

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Statement on behalf of the Claimant

Witness: A Scruton

1st Statement

Dated: 6th March 2019

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION
187B TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE
BOROUGH OF NUNEATON AND BEDWORTH

Defendants

Exhibit "AS 56"

15/11/2018
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WARWICKSHIRE POLICE RESTRICTED

Incident Report / WK-20160901-0266 / WK-2016-0107522

ASS6 1821

01/09/2016 17:06:56 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / PNC
Priority: (4) SCHEDULED Source: RADIO
Disposal Codes (1-6): -AS23.1/ / / / /
Operator No: -5374 Scenario: -WARKS
Dispatcher No: -
Handling Unit: -

Beat: -N51NUN N+B
RIAN51L (436740,290233)

Creator Wkst: -50
Owner Wkst: -50
Officer in case: -5975

--- Address Information ---

Approx Location
9999 DONNITHORNE AVE, NUNEATON,

Proximity: -
[X] Valid Gazetteer: -

--- Complainant Details ---

Surname/First Name: -NS63 1ST_NAME(CONFIRM_SPELLING)
Address: -

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity: - , ,
Email: -

--- Date/Time Info. ---

Event	Date	Time
INITIAL INPUT	01/09/2016	17:06:56
HELD	01/09/2016	17:06:56
UNACTIONED	01/09/2016	17:07:03
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	01/09/2016	22:28:40

--- Comments ---

Comment	Date	Time	Ref	System	Remarks
Created from Shadow Incident	01/09/2016	17:06:56	5374	50	REMARKS
NS63 TO UPDATE WHEN BACK AT THE STATION	01/09/2016	17:08:11	5374	50	REMARKS
**	01/09/2016	17:08:12	5374	50	REMARKS
SNT INFO TAG ADDED	01/09/2016	17:08:18	5374	50	SYSTEM
CH- CALL FROM [REDACTED] WHO LIVES AT [REDACTED]	01/09/2016	17:23:47	5379	14	REMARKS
DOES NOT WANT TO GIVE OTHER DETAILS - STATES THAT TRAVELLERS ARE THERE AND MORE CARAVANS ARE COMING HE STATES THAT THIS IS BY CADWELL GRANGE. THEY ALSO HAVE SEVERAL DOGS OFF THE LEADS.. BUSY ROAD...	01/09/2016	17:23:47	5379	14	REMARKS
Transfer To 01NORTHERN From Workstation 14	01/09/2016	17:24:00	5379	14	SYSTEM
Control	01/09/2016	17:33:58	5374	50	SYSTEM
Transfer Accepted At Workstation 50 For Control	01/09/2016	20:22:32	6142	WAR100417	REMARKS
NS63- ATTENDED SPOKEN TO FEMALE WHO SAID MALES WERE OUT AT THE TIME SHE TOLD ME THEY ARRIVED THE NIGHT BEFORE AND THE COUNCIL HAVE BEEN OUT TO SEE THEM	01/09/2016	20:23:44	6142	WAR100417	REMARKS
NS63- FEMALE THINKS THEY MAYBE STAYING UNTIL AT LEAST MONDAY TUESDAY WHICH IS THE 5TH OR 6TH SEPT	01/09/2016	20:24:39	6142	WAR100417	REMARKS
NS63- VRM'S TAKEN OF THE VEHICLES AND CARAVANS PRESENT 5 CARAVANS IN TOTAL BUT ONLY THREE VEHICLES PRESENT	01/09/2016	20:28:30	6142	WAR100417	REMARKS
VRMS TO FOLLOW	01/09/2016	20:28:48	6142	WAR100417	REMARKS
RE61ZRF	01/09/2016	20:28:54	6142	WAR100417	REMARKS
HV15XKU	01/09/2016	20:29:09	6142	WAR100417	REMARKS
YX13XNE	01/09/2016	20:29:19	6142	WAR100417	REMARKS
YR65EFP	01/09/2016	20:29:25	6142	WAR100417	REMARKS
UUI13374	01/09/2016	20:29:35	6142	WAR100417	REMARKS
PN65ZRF	01/09/2016	20:30:25	6142	WAR100417	REMARKS
NS63- ADVISED FEMALE RE DOGS RUNNING LOOSE AS THEY WERE GOING ALL THE WAY ACROSS THE FIELD TO THE MAIN ROAD	01/09/2016	22:23:09	5975	42	SYSTEM
Vehicle searched: RE661XRF	01/09/2016	22:23:09	5975	42	SYSTEM
Vehicle searched: RE661XRF	01/09/2016	22:23:42	5975	42	REMARKS
OTHER RE661XRF	01/09/2016	22:24:10	5975	42	SYSTEM
Vehicle searched: HV15XKU	01/09/2016	22:24:10	5975	42	SYSTEM
Vehicle searched: HV15XKU	01/09/2016	22:24:12	5975	42	SYSTEM
Vehicle selected: HV15XKU	01/09/2016	22:24:42	5975	42	REMARKS
OTHER HV15XKU	01/09/2016	22:25:15	5975	42	SYSTEM
Vehicle searched: YX13XNE					

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Incident Report / WK-20160901-0266 / WK-2016-0107522

Vehicle searched: YX13XNE	01/09/2016 22:25:15 5975	42	SYSTEM
OTHER YX13XNE	01/09/2016 22:25:37 5975	42	REMARKS
Vehicle searched: UUI3374	01/09/2016 22:26:04 5975	42	SYSTEM
Vehicle searched: UUI3374	01/09/2016 22:26:04 5975	42	SYSTEM
OTHER UUI3374	01/09/2016 22:26:32 5975	42	REMARKS
Vehicle searched: PN65ZRF	01/09/2016 22:27:05 5975	42	SYSTEM
Vehicle searched: PN65ZRF	01/09/2016 22:27:05 5975	42	SYSTEM
OTHER PN65ZRF	01/09/2016 22:27:44 5975	42	REMARKS
-	01/09/2016 22:28:03 5975	42	REMARKS
CTRL - UUI3374 IS SHOWING NO INSURANCE	01/09/2016 22:28:13 5975	42	REMARKS
-	01/09/2016 22:28:13 5975	42	REMARKS
* Arrests * Cautions * Reports	01/09/2016 22:28:40 5975	42	DISPOSE
DISPOSAL CODE-: AS23.1	01/09/2016 22:28:40 5975	42	DISPOSE
NSIR Qualifiers: HD2.6	01/09/2016 22:28:40 5975	42	DISPOSE
WK-20160901-0266 HAS BEEN DISPOSED OR DEFERRED	01/09/2016 22:28:40 5975	42	DISPOSE
E-MAIL RECEIVED FROM NBBC - THE TRAVELLERS	01/09/2016 22:28:40 5975	42	DISPOSE
HAVE LEFT. [REDACTED] TASKED TO	02/09/2016 14:12:31 0117	42	DISPOSE
CHECK AND ENSURE THEY HAVEN'T ONTO ANYWHERE			WAR100329 REMARKS
LOCALLY.			
Reason for Print:HH	15/11/2018 08:48:17 5904	DTE05570	SYSTEM

---- Relations ----
VEHICLE - OTHER HV15XKU
RENAULT TRAFIC VAN SILVER
VEHICLE - OTHER RE661XRF
RENAULT TRAFFIC PANEL VAN WHITE
VEHICLE - OTHER PN65ZRF
AUDI A3 SALOON BLACK
VEHICLE - OTHER UUI3374
FORD TRANSIT PANEL VAN WHITE
VEHICLE - OTHER YX13XNE
CITROEN BERLINGO PANEL VAN WHITE

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Incident Report / WK-20160904-0323 / WK-2016-0109066

04/09/2016 18:32:41 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING
Priority: (3) PRIORITY Source999
Disposal Codes (1-6):-AS22.1/ / / / /
Operator No:-5378 Scenario:-WARKS
Dispatcher No:-5289
Handling Unit:-NS63

Beat:-N51NUN N+B
RIAN51L (436740,290233)

Creator Wkst:-HQ131
Owner Wkst:-50
Officer in case:-6142

----- Address Information -----

Approx Location
9999 DONNITHORNE AVE, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:
Address:-PASSER BY,

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:- , ,
Email:-

----- Date/Time Info. -----

	04/09/2016	18:32:32
	04/09/2016	18:32:32
INITIAL INPUT	04/09/2016	18:32:41
HELD	04/09/2016	18:32:51
IN ACTIONED	04/09/2016	18:34:07
ASSIGNED		
DISPATCHED	04/09/2016	19:07:09
AT SCENE	04/09/2016	19:44:15
CLEARED	04/09/2016	19:44:16
RESULTED		
DISPOSED	04/09/2016	23:58:44

----- Comments -----

999: [REDACTED] 7352 ,290070 ,700	04/09/2016 18:32:41 5378	HQ131	SYSTEM
,700, 80 ,90.0 ,OSGB36, *MOB* VODAFONE			
,99,20160904183145,0 ,DATA AVAILABLE ,20292030			
20160904 183232			
Alias DONNITHORN AVE used to find DONNITHORNE	04/09/2016 18:32:51 5378	HQ131	REMARKS
AVE			
	04/09/2016 18:33:01 5378	HQ131	REMARKS
THERE ARE TRAVELLERS THAT HAVE MOVED ONTO A	04/09/2016 18:33:20 5378	HQ131	REMARKS
SMALL PIECE OF LAND HER			
	04/09/2016 18:33:21 5378	HQ131	REMARKS
THIS HAS JUST HAPPENED	04/09/2016 18:33:25 5378	HQ131	REMARKS
	04/09/2016 18:33:26 5378	HQ131	REMARKS
THERE ARE 5 IN TOTAL	04/09/2016 18:33:31 5378	HQ131	REMARKS
	04/09/2016 18:33:32 5378	HQ131	REMARKS
THEY WERE SHOUTING AND SWEARING AT INF	04/09/2016 18:33:39 5378	HQ131	REMARKS
	04/09/2016 18:33:40 5378	HQ131	REMARKS
THEY WERE SHOUTING - ' THE PIKIES ARE BACK IN	04/09/2016 18:33:55 5378	HQ131	REMARKS
TOWN'			
	04/09/2016 18:33:55 5378	HQ131	REMARKS
Transfer To 01NORTHERN From Workstation HQ131	04/09/2016 18:34:08 5378	HQ131	SYSTEM
Control			
* PRIORITY - NECESSARY TO PREVENT/REDUCE HARM	04/09/2016 18:34:22 5378	HQ131	REMARKS
	04/09/2016 18:34:22 5378	HQ131	REMARKS
Transfer Accepted At Workstation 50 For Control	04/09/2016 18:38:38 5370	50	SYSTEM
CTRL - PA222 AWARE	04/09/2016 19:06:43 5289	31	REMARKS
**	04/09/2016 19:06:44 5289	31	REMARKS
NS63 MOBILISED BY DRAG/DROP	04/09/2016 19:07:09 5289	31	SYSTEM
Arrival time target not met	04/09/2016 19:35:39 SYSTEM	MASTER	REMARKS
NS63 6 - AT SCENE/DEALING WITH INC.	04/09/2016 19:44:15 5370	50	SYSTEM
NS63 2 - AVAILABLE,RESUMING PATROL	04/09/2016 19:44:16 5370	50	SYSTEM
NS63 - NOTED THE VRMS	04/09/2016 19:52:21 5289	31	REMARKS
WILL PUT THEM ON THE JOB	04/09/2016 19:52:32 5289	31	REMARKS
**	04/09/2016 19:52:33 5289	31	REMARKS
NS63- ATTENDED SHORTLY AFTER THEIR ARRIVAL AND	04/09/2016 21:08:19 6142	WAR60232	REMARKS
HAD A CHAT WITH ONE OF THE MALES			
HE WAS FINE NO ISSUES STATED THEY WILL MOST	04/09/2016 21:08:37 6142	WAR60232	REMARKS
LIKELY TRY AND STAY AS LONG AS THEY CAN			
ANOTHER MALE STATED HIS SISTER WAS EXPECTING	04/09/2016 21:09:15 6142	WAR60232	REMARKS
SO THEY NEEDED ACCESS TO WALSGRAVE HOSPITAL			

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15/11/2018
08:49:09
5904
DTE05570

WARWICKSHIRE POLICE RESTRICTED

1824

Incident Report / WK-20160904-0323 / WK-2016-0109066

NS63- EXPLAINED WHY I WAS THERE MALES WERE FINE
VRM TO FOLLOW

BD06 MVY
T813LDD
SL56JYE
MT16 KVR
AFZ 7497
BL55TJX
PJ15MYA
NS63- MALE STATED THEY HAVE COME FROM RUGBY
WHEN ASKED WHERE THEY HAD COME FROM
NS63- NC40 HAS NOTIFIED NBBC
NS63- AREA PATROLLED SEVERAL TIMES NO ISSUES
APPARENT
NC40 - DUTY INSP AWARE OF INC
Vehicle searched: BD06MVY
Vehicle selected: BD06MVY
OTHER BD06MVY
Vehicle searched: T813LDD
Vehicle selected: T813LDD
OTHER T813LDD
Vehicle searched: SL56JYE
Vehicle selected: SL56JYE
OTHER SL56JYE
Vehicle searched: MT16KVR
OTHER MT16KVR
Vehicle searched: AFZ7497
Vehicle selected: AFZ7497
OTHER AFZ7497
Vehicle searched: BL55TJX
Vehicle selected: BL55TJX
OTHER BL55TJX
Vehicle searched: PJ15MYA
Vehicle selected: PJ15MYA
OTHER PJ15MYA
* Arrests * Cautions * Reports
DISPOSAL CODE-: AS22.1
NSIR Qualifiers: OT1.1
WK-20160904-0323 HAS BEEN DISPOSED OR DEFERRED
Cross Referenced By Incident WK-20160923-0197
Reason for Print:HH

Date	Time	Page	Remarks
04/09/2016	21:09:38	6142	WAR60232
04/09/2016	21:13:30	6142	WAR60232
04/09/2016	21:13:34	6142	WAR60232
04/09/2016	21:13:45	6142	WAR60232
04/09/2016	21:14:00	6142	WAR60232
04/09/2016	21:14:06	6142	WAR60232
04/09/2016	21:14:16	6142	WAR60232
04/09/2016	21:14:46	6142	WAR60232
04/09/2016	21:14:56	6142	WAR60232
04/09/2016	21:15:12	6142	WAR60232
04/09/2016	21:17:11	6142	WAR60232
04/09/2016	21:17:42	6142	WAR60232
04/09/2016	21:17:59	6142	WAR60232
04/09/2016	21:20:03	6142	WAR60232
04/09/2016	22:09:18	5381	50
04/09/2016	22:09:23	5381	50
04/09/2016	22:09:31	5381	50
04/09/2016	22:10:24	5381	50
04/09/2016	22:10:27	5381	50
04/09/2016	22:10:50	5381	50
04/09/2016	22:11:55	5381	50
04/09/2016	22:11:57	5381	50
04/09/2016	22:12:02	5381	50
04/09/2016	22:12:40	5381	50
04/09/2016	22:13:38	5381	50
04/09/2016	22:14:30	5381	50
04/09/2016	22:14:34	5381	50
04/09/2016	22:14:39	5381	50
04/09/2016	22:15:32	5381	50
04/09/2016	22:15:36	5381	50
04/09/2016	22:15:44	5381	50
04/09/2016	22:17:43	5381	50
04/09/2016	22:17:46	5381	50
04/09/2016	22:17:54	5381	50
04/09/2016	22:18:17	5381	50
04/09/2016	23:58:44	5289	31
04/09/2016	23:58:44	5289	31
04/09/2016	23:58:44	5289	31
04/09/2016	23:58:44	5289	31
23/09/2016	12:03:51	5320	42
15/11/2018	08:49:09	5904	DTE05570

--- Relations ---
CALL CARD - XREF CALL
MOBILE - ISR RELATION

WK-20160923-0197 (N51L) ASSOCIATED BY OPERATOR 5320
437352,290070,700,700,80,90.0
999: [REDACTED] 437352 ,290070 ,700 ,700,80 ,90.0
OSGB36, [REDACTED] ,99,20160904183145,0 ,DATA AVAILAB
LE ,20292030 20160904 183232
T813LDD
PEUGEOT 406 LX 4 DOOR SAL SILVER
BD06MVY
CITROEN BERLINGO CAR-DERIVE WHITE
SL56JYE
TOYOTA HIACE PANEL VAN WHITE
MT16KVR
AUDI A3 SPORT SALOON GREY
AFZ7497
FORD FOCUS SALOON RED
BL55TJX
CITROEN BERLINGO CAR/VAN WHITE
PJ15MYA
VAUXHALL VIVARO PANEL VAN GREY

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Statement on behalf of the Claimant
 Witness: A Scruton
 1st Statement

Dated: 6th March 2019

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2014-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION
 187B TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN:

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS IN
 SCHEDULE 1 OF THE CLAIM FORM

(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE
 BOROUGH OF NUNEATON AND BEDWORTH

Defendants

Exhibit "AS 57"

15/11/2018
08:44:20
5904
DTE05570

WARWICKSHIRE POLICE RESTRICTED

Incident Report / WK-20160809-0411 / WK-2016-0096582

"AS 57" 1826

09/08/2016 21:19:10 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / NC62/NS65
Priority:(3) PRIORITY
Disposal Codes (1-6):-AS23.1/ / / /
Operator No:-4572
Dispatcher No:-4454
Handling Unit:-NC62

Beat:-N51NUN N+B
RIAN51L (437005,290396)
Creator Wkst:-47
Owner Wkst:-50
Officer in case:-6133

---- Address Information ----

■ DONNITHORNE AVE, NUNEATON, CV114QJ

Proximity:-
[X] Valid Gazetteer:-

---- Complainant Details ----

Surname/First Name: ■
Address: ■

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, /
Email:-

---- Date/Time Info. ----

INITIAL INPUT	09/08/2016	21:19:10
ELD	09/08/2016	21:19:10
NACTIONED	09/08/2016	21:20:06
ASSIGNED		
DISPATCHED	09/08/2016	21:23:12
AT SCENE	09/08/2016	21:31:57
CLEARED	09/08/2016	21:44:35
RESULTED		
DISPOSED	09/08/2016	21:44:46

---- Comments ----

Created from Shadow Incident	09/08/2016 21:19:10 4572	47	REMARKS
NPT Priority=. Vulnerable=. ETA given=.	09/08/2016 21:19:10 4572	47	SYSTEM
INFT STATES 3 CARAVANS HAVE JUST TURNED UP ON THE GREEN OUTSIDE HER HOUSE	09/08/2016 21:19:30 4572	47	REMARKS
*	09/08/2016 21:19:30 4572	47	REMARKS
STATES SHE BELEIVE THE REST OF THE TRAVELLERS WILL TURN UP SHORTLY AS LAST TIME THERE WERE LOADS OF THEM AND THEY WOULDNT MOVE OFF	09/08/2016 21:19:58 4572	47	REMARKS
Transfer To OlnORTHERN From Workstation 47 Control	09/08/2016 21:20:11 4572	47	SYSTEM
Transfer Accepted At Workstation 50 For Control	09/08/2016 21:20:23 5345	50	SYSTEM
Cross Referenced To Incident WK-20160809-0405	09/08/2016 21:20:59 5345	50	SYSTEM
NC62 MOBILISED BY DRAG/DROP	09/08/2016 21:23:12 4454	31	SYSTEM
NC62 6 - AT SCENE/DEALING WITH INC.	09/08/2016 21:31:57 4454	31	SYSTEM
NS60 MOBILISED BY DRAG/DROP	09/08/2016 21:34:29 4454	31	SYSTEM
NS60 6 - AT SCENE/DEALING WITH INC.	09/08/2016 21:34:31 4454	31	SYSTEM
NS65 MOBILISED BY DRAG/DROP	09/08/2016 21:34:46 4454	31	SYSTEM
NS65 6 - AT SCENE/DEALING WITH INC.	09/08/2016 21:34:47 4454	31	SYSTEM
NS60 2 - AVAILABLE,RESUMING PATROL	09/08/2016 21:34:48 4454	31	SYSTEM
NC62 - THE WADEBRIDGE INC WAS THE TRAVELLERS MOVING OFF, WE WILL CHECK DONNITHORNE	09/08/2016 21:35:48 4454	31	REMARKS
*	09/08/2016 21:44:06 5345	50	REMARKS
NC62 - THESE ARE THE ONES FROM THE OTHER DAY WE WILL LET SNT SUPV KNOW TO START THE BALL ROLLING WITH THE PAPER WORK	09/08/2016 21:44:16 5345	50	REMARKS
**	09/08/2016 21:44:31 5345	50	REMARKS
NC62 2 - AVAILABLE,RESUMING PATROL	09/08/2016 21:44:33 5345	50	REMARKS
NS65 2 - AVAILABLE,RESUMING PATROL	09/08/2016 21:44:34 5345	50	SYSTEM
# Arrests # Cautions # Reports	09/08/2016 21:44:35 5345	50	SYSTEM
DISPOSAL CODE:- AS23.1	09/08/2016 21:44:46 5345	50	DISPOSE
NSIR Qualifiers: OT1.1	09/08/2016 21:44:46 5345	50	DISPOSE
WK-20160809-0411 HAS BEEN DISPOSED OR DEFERRED	09/08/2016 21:44:46 5345	50	DISPOSE
Cross Referenced To Incident WK-20160810-0008	10/08/2016 00:29:50 5345	50	SYSTEM
Reason for Print:HH	15/11/2018 08:44:20 5904	DTE05570	SYSTEM

---- Relations ----

CALL CARD - XREF CALL	WK-20160810-0008 (N51L)	ASSOCIATED BY OPERATOR 5345
CALL CARD - XREF CALL	WK-20160809-0405 (N51H)	ASSOCIATED BY OPERATOR 5345

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Statement on behalf of the Claimant
 Witness: A Scruton
 1st Statement

Dated: 6th March 2019

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2014-00061 b

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION
 187B TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS IN
 SCHEDULE 1 OF THE CLAIM FORM

(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE
 BOROUGH OF NUNEATON AND BEDWORTH

Defendants

Exhibit "AS 58"

15/11/2016
08:40:09
5904
DTE05570

Incident Report / WK-20160803-0355 / WK-2016-0093833

AD 1828

03/08/2016 20:39:00 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING / **TRAVELLERS** Beat:-N51NUN N+B
Priority:(3) PRIORITY SourceTEL RIAN51H (438165,292290)
Disposal Codes (1-6):-AS22.1/ / / / / Creator Wkst:-38
Operator No:-4267 Scenario:-WARKS Owner Wkst:-50
Dispatcher No:-4735 Officer in case:-1151
Handling Unit:-NE50

----- Address Information -----

Approx Location
9999 CAMBORNE DR, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:

Address:

DOB / Sex / Ethnicity:-, ,

Email:-

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

----- Date/Time Info. -----

Event	Date	Time
INITIAL INPUT	03/08/2016	20:39:00
HELD	03/08/2016	20:39:09
UNACTIONED	03/08/2016	20:40:18
SIGNED		
DISPATCHED	03/08/2016	20:43:32
AT SCENE	03/08/2016	20:48:14
CLEARED	04/08/2016	10:16:12
RESULTED		
DISPOSED	04/08/2016	17:32:54

----- Comments -----

Comments	Date	Time	Ref	System	Remarks
10	03/08/2016	20:39:22	4267	38	REMARKS
10/12 GYPSY CARAVANS HAVE JUST ARRIVED ON THE	03/08/2016	20:39:46	4267	38	REMARKS
ESTATE					
LIKELY HEADING FOR THE GRASSED AREA TIVERTON DR	03/08/2016	20:39:57	4267	38	REMARKS
.	03/08/2016	20:39:58	4267	38	REMARKS
FURTHER CLAL FROM ANOTHER RESIDENT RREPORTING	03/08/2016	20:40:04	4267	38	REMARKS
THIS	03/08/2016	20:40:04	4267	38	REMARKS
.	03/08/2016	20:40:19	4267	38	SYSTEM
Transfer To D1NORTHERN From Workstation 38					
Control					
# PRIORITY - FORCE POLICY FOR THIS CALL TYPE	03/08/2016	20:40:57	4267	38	REMARKS
Cross Referenced By Incident WK-20160803-0356	03/08/2016	20:41:11	4267	38	SYSTEM
NE50 MOBILISED BY DRAG/DROP	03/08/2016	20:43:32	4735	31	SYSTEM
NE62 MOBILISED BY DRAG/DROP	03/08/2016	20:43:57	4735	31	SYSTEM
NE60 MOBILISED BY DRAG/DROP	03/08/2016	20:44:07	4735	31	SYSTEM
Transfer Accepted At Workstation 31 For Control	03/08/2016	20:44:18	4735	31	SYSTEM
NE62 6 - AT SCENE/DEALING WITH INC.	03/08/2016	20:48:14	SYSTEM	ARLSERVER	SYSTEM
NE60 6 - AT SCENE/DEALING WITH INC.	03/08/2016	20:49:59	4735	31	SYSTEM
NE62 CANNOT FIND THEM AT THE MOMENT CAN SEE	03/08/2016	20:50:55	4735	31	REMARKS
WHERE THEY HAVE DRIVEN OVER WADEBRIDGE.					
CHECKING TIVERTON DR					
NE50 6 - AT SCENE/DEALING WITH INC.	03/08/2016	20:53:08	SYSTEM	ARLSERVER	SYSTEM
NE62 THEY ARE AT THE END OF TAVISTOCK WAY.	03/08/2016	20:54:42	4735	31	REMARKS
N62 THERE ARE FIVE VANS, SAY THEY WILL BE HERE	03/08/2016	20:58:36	4735	31	REMARKS
FOR 5-6 DAYS. HAVE SAID THEY WONT LEAVE ANY					
MESS AND WILL KEEP THE NOISE DOWN SO AS NOT TO					
AGGREGATE THE RESIDENTS. THEY DO HAVE ONE					
CARAVAN WITH A TOILET IN IT AS WELL. WE HAVE	03/08/2016	20:58:47	4735	31	REMARKS
OBTAINED ALL THE VRMS.					
NE50 5 VANS AS PREVIOUSLY MENTIONED BY NE62	03/08/2016	21:16:56	1151	WAR100327	REMARKS
THERE ARE 5 VANS SET UP IN AN AREA WHICH					
SHOULD NOT CAUSE TO MANY ISSUES TO PARK USERS.					
I HAVE NO POWER TO MOVE THEM ON.					
NE50 2 - AVAILABLE,RESUMING PATROL	03/08/2016	21:20:20	4735	31	SYSTEM
NE60 2 - AVAILABLE,RESUMING PATROL	03/08/2016	21:20:21	4735	31	SYSTEM
NE62 2 - AVAILABLE,RESUMING PATROL	03/08/2016	21:20:22	4735	31	SYSTEM
VEHICLE DETAILS ARE: WHITE CITROEN VAN BD06	03/08/2016	21:34:31	6205	BED92	REMARKS
MVY, SILVER VAN PJ15 MYA, WHITE FORD SK65 HFY,					
.	03/08/2016	21:36:13	5648	30	REMARKS
WHITE NISSAN NAVARA MT16KYR, WHITE CITROEN VAN	03/08/2016	21:36:37	6205	BED92	REMARKS
BL55 TJX, TOYOTA HIACE SL56 JYE, SILVER					

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15/11/2018
08:40:09
5904
DTE05570

Incident Report / WK-20160803-0355 / WK-2016-0093833

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Text	Date/Time	Page	Remarks
PEUGEOT T813 CDD			
FURTHER CALL FROM CLL [REDACTED]	03/08/2016 21:39:29	5648	30
HE IS NOT HAPPY THAT THE TRAVELLERS ARE NOT	03/08/2016 21:40:03	5648	30
BEING MOVED ON AS WE MOVED THEM WHEN THEY WERE			
ON ABBEY GREEN			
NONE OF THE BOLTS OR LOCKS HAVE BEEN DAMAGED	03/08/2016 21:40:22	5648	30
ON THE GATES AS FAR AS CLLR CAN SEE			
SO THE TRAVELLERS MUST HAVE DRIVE ON THE	03/08/2016 21:40:41	5648	30
FOOTPATHS			
Transfer To 01NORTHERN From Workstation 30	03/08/2016 21:40:47	5648	30
Control			
Transfer Accepted At Workstation 31 For Control	03/08/2016 21:41:32	4735	31
CTRL - NE62 MADE AWARE RE COUNCILLOR RINGING	03/08/2016 21:43:26	4735	31
IN BUT NOW GOING OFF DUTY.			
*NE50 I HAVE SPOKEN TO [REDACTED] ON THE	03/08/2016 22:10:33	1151	WAR100327
PHONE AND EXPLAINED THE SITUATION. HE IS WAS			
CONCERNED AS THEY MUST HAVE DRIVEN ACROSS THE			
FOOTPATH TO GET WHERE THEY HAVE AND BELIEVED			
WE COULD HAVE MOVED THEM ON, ON THIS BASIS. I	03/08/2016 22:10:33	1151	WAR100327
ALSO EXPLAINED IF THAT WAS THE CASE WE DID NOT			
HAVE THE RESOURCES TO DO THIS.			
**			
WK-20160803-0355 PRINTED AT WORKSTATION:50 ->	03/08/2016 22:12:03	4265	42
HP LaserJet 4250 PCL 6	03/08/2016 22:14:19	4207	50
Reason for Print:4207			
WK-20160803-0355 PRINTED AT	03/08/2016 22:14:18	4207	50
WORKSTATION:WAR100327 -> HP LJ P3015 -	03/08/2016 22:27:21	1151	WAR100327
WAR100703 (B&W)			
Reason for Print:SNT	03/08/2016 22:27:21	1151	WAR100327
CALL CARD SUCCESSFULLY DEFERRED 04/08/2016	03/08/2016 22:29:41	4207	50
06:00:00 Workstation 50			
*			
CAD093: REACTIVATED AT MASTER	03/08/2016 22:29:41	4207	50
Transfer Accepted At Workstation 50 For	04/08/2016 06:00:41	SYSTEM	MASTER
Information	04/08/2016 06:48:43	5320	50
SNT INFO TAG ADDED			
CTRL- SNT AWARE OF TRAVELLERS AND HAVE LIASED	04/08/2016 07:51:49	5933	31
WITH THEM	04/08/2016 08:03:22	5933	31
NO NEED FOR INC TO STAY OPEN			
# Arrests # Cautions # Reports	04/08/2016 08:03:28	5933	31
DISPOSAL CODE-: AS23.1	04/08/2016 08:03:38	5933	31
NSIR Qualifiers: OT1.1	04/08/2016 08:03:38	5933	31
WK-20160803-0355 HAS BEEN DISPOSED OR DEFERRED	04/08/2016 08:03:38	5933	31
WK-20160803-0355 PRINTED AT	04/08/2016 08:03:38	5933	31
WORKSTATION:WAR90130 -> H:\Gypsy and Traveller	04/08/2016 09:00:14	0932	WAR90130
Incidents\Inc 355 030816 Wadebridge Rd			
Nuneaton.txt			
Reason for Print:GRT LIAISON	04/08/2016 09:00:14	0932	WAR90130
Cross Referenced To Incident WK-20160804-0078	04/08/2016 09:02:03	5933	31
Previous Result Codes:-AS23.1	04/08/2016 10:16:10	5320	50
UALFIERS WERE: OT1.1	04/08/2016 10:16:10	5320	50
CAD093: REACTIVATED AT 50	04/08/2016 10:16:12	5320	50
Transfer Accepted At Workstation 50 For	04/08/2016 10:16:15	5320	50
Information			
Cross Referenced To Incident WK-20160804-0100	04/08/2016 10:16:34	5320	50
Cross Referenced To Incident WK-20160804-0100	04/08/2016 10:16:54	5320	50
CTRL- PLEASE SEE XR LOG	04/08/2016 10:17:20	5320	50
*	04/08/2016 10:17:21	5320	50
FROM NS51 - WE HAVE ATTENDED THE SITE AND HAVE	04/08/2016 13:00:39	0627	WAR100330
ISSUED SEC 59 PRA WARNINGS TO THE FOLLOWING			
VEHICLES:			
WHITE CITROEN BERLINGO, BD06MVY	04/08/2016 13:00:39	0627	WAR100330
VAUXHALL VAN PJ15MYA	04/08/2016 13:00:39	0627	WAR100330
NISSAN NIVARO MT16KYR	04/08/2016 13:00:39	0627	WAR100330
PEUGEOT 406 T813LDD.	04/08/2016 13:00:39	0627	WAR100330
	04/08/2016 13:00:39	0627	WAR100330
THE RESPECTIVE DRIVERS/OWNERS ARE AWARE AND IT	04/08/2016 13:00:39	0627	WAR100330
HAS BEEN EXPLAINED THAT SHOULD THEY DRIVE ONTO			
THE SITE AGAIN OR CAUSE PROBLEMS WITH THE			
VEHICLES THEN THEY MAY BE SEIZED UNDER SEC			
60 PRA.	04/08/2016 13:00:39	0627	WAR100330
TASKING UPDATED.	04/08/2016 13:00:39	0627	WAR100330
Cross Referenced By Incident WK-20160804-0208	04/08/2016 14:36:21	5320	50

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WARWICKSHIRE POLICE RESTRICTED

1830

Incident Report / WK-20160803-0355 / WK-2016-0093833

# Arrests	# Cautions	# Reports					
			04/08/2016 17:32:53	5976	31		DISPOSE
			04/08/2016 17:32:53	5976	31		DISPOSE
			04/08/2016 17:32:54	5976	31		DISPOSE
			04/08/2016 17:32:54	5976	31		DISPOSE
			15/11/2018 08:40:09	5904	DTE05570		SYSTEM

DISPOSAL CODE=: AS22.1
NSIR Qualifiers: OT1.1
WK-20160803-0355 HAS BEEN DISPOSED OR DEFERRED
Reason for Print:HH

---- Relations ----

CALL CARD - XREF CALL	WK-20160803-0356 (N51H)	ASSOCIATED	BY OPERATOR 4267
CALL CARD - XREF CALL	WK-20160804-0078 (N51H)	ASSOCIATED	BY OPERATOR 5933
CALL CARD - XREF CALL	WK-20160804-0208 (N51H)	ASSOCIATED	BY OPERATOR 5320
CALL CARD - XREF CALL	WK-20160804-0100 (N51H)	ASSOCIATED	BY OPERATOR 5320
CALL CARD - XREF CALL	WK-20160804-0100 (N51H)	ASSOCIATED	BY OPERATOR 5320

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WARWICKSHIRE POLICE RESTRICTED

1831

Incident Report / WK-20160803-0356 / WK-2016-0093834

03/08/2016 20:39:37 (TRESPASS) TRESPASS/UNAUTHORISED CAMPING
Priority: (5) RES WD SourceTEL
Disposal Codes (1-6): -AD06.1 / / / /
Operator No: -4572 Scenario: -WARKS
Dispatcher No:-
Handling Unit:-

Beat: -N51NUN N+B
RIANSIH (437686, 292036)

Creator Wkst: -47
Owner Wkst: -31
Officer in case: -4265

----- Address Information -----

WADEBRIDGE DR, NUNEATON, [REDACTED]

Proximity: -OPPOSITE
[X] Valid Gazetteer: -

----- Complainant Details -----

Surname/First Name: [REDACTED]
Address: [REDACTED]

DOB / Sex / Ethnicity: -, ,
Email: -

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

----- Date/Time Info. -----

INITIAL INPUT	03/08/2016	20:39:37
HELD	03/08/2016	20:39:37
UNACTIONED	03/08/2016	20:40:23
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	03/08/2016	20:44:41

----- Comments -----

Created from Shadow Incident	03/08/2016 20:39:37 4572	47	REMARKS
NPT Priority=. Vulnerable=. ETA given=.	03/08/2016 20:39:37 4572	47	SYSTEM
INFT STATES APPROX 10 CARAVANS HAVE JUST	03/08/2016 20:40:18 4572	47	REMARKS
DRIVEN INTO THE PARK AND LOOKS LIKE THEY ARE			
SETTING UP THERE			
*	03/08/2016 20:40:19 4572	47	REMARKS
NO VRMS	03/08/2016 20:40:21 4572	47	REMARKS
Transfer To OlnORTHERN From Workstation 47	03/08/2016 20:40:25 4572	47	SYSTEM
Control			
INFT INSISTING WE ATTEND AND STOP THEM	03/08/2016 20:40:35 4572	47	REMARKS
Cross Referenced To Incident WK-20160803-0355	03/08/2016 20:41:11 4267	38	SYSTEM
CH... FURTHER CALL FROM [REDACTED]	03/08/2016 20:41:12 4260	36	REMARKS
	03/08/2016 20:41:21 4260	36	REMARKS
	03/08/2016 20:41:44 4260	36	REMARKS
THEY ARE GOING TO THE PARK AREA	03/08/2016 20:42:00 4735	31	SYSTEM
Transfer Accepted At Workstation 31 For Control	03/08/2016 20:42:59 5648	30	REMARKS
*	03/08/2016 20:43:17 5648	30	REMARKS
FURTHER CALL FROM [REDACTED]	03/08/2016 20:43:49 5648	30	REMARKS
REPORTING THE SAME	03/08/2016 20:44:05 5648	30	REMARKS
MORE AND MORE ARE ARRIVING	03/08/2016 20:44:15 5648	30	REMARKS
ON HORSETON GRANGE	03/08/2016 20:44:20 5648	30	SYSTEM
Transfer To OlnORTHERN From Workstation 30			
Control			
*	03/08/2016 20:44:20 4267	38	REMARKS
AND ANOTHER CALL REPORTING THE SAME	03/08/2016 20:44:25 4267	38	REMARKS
Priority changed from PRIORITY to RES WD -	03/08/2016 20:44:29 4265	50	SYSTEM
reason SITUATION UPDATE RCVD			
DUPL INC, SEE XREF FOR FURTHER DETAILS	03/08/2016 20:44:29 4265	50	SYSTEM
TRANSFERS CLEARED ON DISPOSAL:	03/08/2016 20:44:41 4265	50	REMARKS
OlnORTHERN (CONTROL)			
# Arrests # Cautions # Reports	03/08/2016 20:44:41 4265	50	DISPOSE
DISPOSAL CODE: - AD06.1	03/08/2016 20:44:41 4265	50	DISPOSE
BRIGN TAG ADDED	03/08/2016 20:44:41 4265	50	SYSTEM
NSIR Qualifiers: OT1.1	03/08/2016 20:44:41 4265	50	DISPOSE
WK-20160803-0356 HAS BEEN DISPOSED OR DEFERRED	03/08/2016 20:44:41 4265	50	DISPOSE
NE62 HAVE SPOKEN TO TRAVELLERS & EXPLAINED	03/08/2016 21:24:03 6205	BED92	REMARKS
THE PROBLEM RESIDENTS HAVE IS THE MESS THEY			
LEAVE, DRIVING VANS AT SPEED ACROSS THE PARK			
ETC. THEY HAVE STATED THEY WILL RESPECT THE	03/08/2016 21:25:55 6205	BED92	REMARKS
RESIDENTS' VEHICLE TYPES & REGISTRATIONS ARE			
: WHITE NISSAN NAVARA MT16 KYR, W			
WHITE CITROEN VAN BL55 TJX,, TOYOTA HIACE SL56	03/08/2016 21:30:00 6205	BED92	REMARKS

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Incident Report / WK-20160803-0356 / WK-2016-0093934

JYE, SILVER PEUGEOT T813 CDD, WHITE CITREON
VAN BD06 MUY, SILVER VAN PJ15 MYA, & WHITE
FORD SK65 HFY
WK-20160803-0356 PRINTED AT
WORKSTATION:WAR90130 -> H:\Gypsy and Traveller
Incidents\Inc 356 030816 Wadebridge Rd
Nuneaton.txt
Reason for Print:GRT LIAISON
Reason for Print:HH

04/08/2016 08:55:57 0932

WAR90130 SYSTEM

04/08/2016 08:55:57 0932

WAR90130 SYSTEM

15/11/2018 08:41:41 5904

DTE05570 SYSTEM

---- Relations ----

CALL CARD - XREF CALL

WK-20160803-0355 (N51H) ASSOCIATED BY OPERATOR 4267

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WARWICKSHIRE POLICE RESTRICTED

1833

Incident Report / WK-20160804-0100 / WK-2016-0094002

04/08/2016 10:06:30 (ASB) ANTI SOCIAL BEHAVIOUR / PA304 UPDATE
Priority: (1) EMERGENCY - URBAN Source999
Disposal Codes (1-6): AS22.1 / / / /
Operator No: 5951 Scenario: WARKS
Dispatcher No: 5320
Handling Unit: PA303

Beat: N51NUN N+B
RIAN51H (438165,292290)

Creator Wkst: 58
Owner Wkst: 50
Officer in case: 1258

--- Address Information ---

Approx Location
9999 CAMBORNE DR, NUNEATON,

Proximity:-
[X] Valid Gazetteer:-

--- Complainant Details ---

Surname/First Name:-
Address:-

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-, ,
Email:-

--- Date/Time Info. ---

	04/08/2016	10:05:23
	04/08/2016	10:05:23
INITIAL INPUT	04/08/2016	10:06:30
HELD	04/08/2016	10:07:20
UNACTIONED	04/08/2016	10:08:34
ASSIGNED		
DISPATCHED	04/08/2016	10:10:01
AT SCENE	04/08/2016	10:21:57
CLEARED	04/08/2016	10:31:19
RESULTED		
DISPOSED	04/08/2016	13:52:49

--- Comments ---

Alias HORESTON GRANGE used to find HORESTON GRANGE SHOPPING CTR	04/08/2016 10:07:20	5951	58	REMARKS
FEMALE FROM THE TRAVELLERS SITE ARE DRIVING ACROSS THE PARK	04/08/2016 10:07:48	5951	58	REMARKS
999: 437482 ,292147 ,556	04/08/2016 10:08:07	5951	58	SYSTEM
,556, 80 ,0.00 ,OSGB36, *MOB* T MOBILE				
,99,20160804100513,0 ,DATA AVAILABLE ,20224407				
20160804 100523				
THEY ARE THREATENING PEOPLE AND DRIVING ART PEOPLE	04/08/2016 10:08:21	5951	58	REMARKS
**	04/08/2016 10:08:22	5951	58	REMARKS
Priority Transfer To QINORTHERN From Workstation 58 Priority Control	04/08/2016 10:08:41	5951	58	SYSTEM
PA303 MOBILISED BY DRAG/DROP	04/08/2016 10:10:02	5320	50	SYSTEM
MOBILISATION MESSAGE SENT TO PA303 (1258	04/08/2016 10:10:02	AIRWAVE	AIRWAVE	SYSTEM
AGWORTH #2313567,2313569), PA303 (1951 BROWN				
#2313568,2313570): WK-20160804-0100: VIOLENCE:				
Approx Location: 9999 HORESTON GRANGE SHOPPING CTR, NUNEATON; N51H;	04/08/2016 10:10:02	AIRWAVE	AIRWAVE	SYSTEM
1ST NAME (CONFIRM SPELLING):				
LAST NAME (CONFIRM SPELLING):				
Priority Transfer Accepted At Terminal 50 For Control	04/08/2016 10:10:13	5320	50	SYSTEM
CALL FROM	04/08/2016 10:10:23	5951	58	REMARKS
**	04/08/2016 10:11:39	5951	58	REMARKS
THE LOCATION NIS THE PARK WHERE TH TRAVELLERS ARE CURRENTLY AT	04/08/2016 10:13:58	5951	58	REMARKS
Cross Referenced By Incident WK-20160803-0355	04/08/2016 10:16:34	5320	50	SYSTEM
Cross Referenced By Incident WK-20160803-0355	04/08/2016 10:16:54	5320	50	SYSTEM
Arrival time target not met	04/08/2016 10:19:34	SYSTEM	MASTER	REMARKS
MOBILISATION MESSAGE SENT TO PA304 (1684	04/08/2016 10:20:28	AIRWAVE	AIRWAVE	SYSTEM
HAYCOCK #2313576), PA304 (1691 YOUNG #2313577):				
WK-20160804-0100: VIOLENCE: Approx Location:				
9999 CAMBORNE DR, NUNEATON; N51H;	04/08/2016 10:20:28	AIRWAVE	AIRWAVE	SYSTEM
PA304 MOBILISED BY DRAG/DROP	04/08/2016 10:20:30	5320	50	SYSTEM
PA303 6 - AT SCENE/DEALING WITH INC.	04/08/2016 10:21:57	5320	50	SYSTEM
PA304 6 - AT SCENE/DEALING WITH INC.	04/08/2016 10:23:26	SYSTEM	ARLSERVER	SYSTEM
PA304- THERE IS NOBODY HERE THAT HAS HAD A VEH	04/08/2016 10:30:16	5320	50	REMARKS

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Incident Report / WK-20160804-0100 / WK-2016-0094002

DRIVEN AT THEM, IT IS REPORTS OF A VEH BEING
USED IN AN ANTISOCIAL WAY

NODBODY HAS BEEN DRIVEN AT HERE

PA304- WILL UPDATE WITH DETAILS SHORTLY

PA303 2 - AVAILABLE, RESUMING PATROL

PA304 2 - AVAILABLE, RESUMING PATROL

SNT INFO TAG ADDED

1684 - THE INF

HE HAS PHOTOGRAPHS ON HIS PHONE OF VEHICLES
DRIVING OFF ROAD
SHOULD SNT REQUIRE THEM FOR ANY SECTION 59
WARNINGS

Person searched:

QUESTION SET HAS BEEN EXITED BEFORE
COMPLETION: QUESTIONS NOT APPLICABLE

Arrests # Cautions # Reports

DISPOSAL CODE-: AS22.1

IR Qualifiers: OT1.1

WK-20160804-0100 HAS BEEN DISPOSED OR DEFERRED

I HAVE HAD ON THE PHONE. HE SAID
THAT THESE TRAVELLERS ARE STILL ON SITE
DESPITE 48 EVICTION NOTICE BEING ISSUED

HE SAID THAT THEY ARE ALSO STILL DRIVING ALONG
THE PATHS TO THE PARK AND THIS POSES RISK TO
PEDESTRIANS, HE SAID SOMEONE IS GOING TO BE
KILLED AT THIS RATE

Reason for Print:HH

--- Relations ---

CALL CARD - XREF CALL

CALL CARD - XREF CALL

MOBILE - ISR RELATION

WK-20160803-0355 (N51H) ASSOCIATED BY OPERATOR 5320
WK-20160803-0355 (N51H) ASSOCIATED BY OPERATOR 5320
437482,292147,556,556,80,0.00
999

PERSON - WITNESS

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WARWICKSHIRE POLICE RESTRICTED

1835

Incident Report / WK-20160804-0078 / WK-2016-0093980

04/08/2016 08:55:19 (ASB) ANTI SOCIAL BEHAVIOUR / SNT
Priority: (4) SCHEDULED SourceTEL
Disposal Codes (1-6):-AS23.1/ / / /
Operator No:-5377 Scenario:-WARKS
Dispatcher No:-
Handling Unit:-

Beat:-N51NUN N+B
RIAN51H (436858,292166)

Creator Wkst:-14
Owner Wkst:-50
Officer in case:-5320

----- Address Information -----

ETONE SIXTH FORM COLLEGE, ETONE SIXTH FORM COLLEGE
LEICESTER RD, NUNEATON, CV116AA

Proximity:-PLAYING FIELDS
[X] Valid Gazetteer:-

----- Complainant Details -----

Surname/First Name:
Address:

[X] No Contact
[?] Media Consent
[?] NPT Priority
[?] Vulnerable
[?] ETA passed

DOB / Sex / Ethnicity:-
Email:-

----- Date/Time Info. -----

INITIAL INPUT	04/08/2016	08:55:19
HELD	04/08/2016	08:55:40
UNACTIONED	04/08/2016	08:57:14
ASSIGNED		
DISPATCHED		
AT SCENE		
CLEARED		
RESULTED		
DISPOSED	04/08/2016	10:15:59

----- Comments -----

INFORMANT IS REPORTING SHE WAS WALKING HER DOG AND SHE HAS JUST RECEIVED ABUSE FROM THE TRAVELLERS ON THE PLAYING FIELDS AT THE BACK OF ETONE COLLEGE	04/08/2016 08:56:37 5377	14	REMARKS
PREVIOUS CALLS VIEWED	04/08/2016 08:56:38 5377	14	REMARKS
	04/08/2016 08:56:59 5377	14	SYSTEM
QUESTION: Q.SET started	04/08/2016 08:57:14 5377	14	SYSTEM
ANSWER: YES	04/08/2016 08:57:16 5377	14	QUESTION
QUESTION: Circumstances:	04/08/2016 08:57:16 5377	14	ANSWER
ANSWER: HAPPENED 15 MINS AGO. INFORMANT WAS WALKING HER DOG - AND THE TRAVELLERS AT CC LOCATION GAVE ME ABUSE. ONE OF THE TRAVELLERS SAID "GET YOUR F ING DOG" - INFORMANT SAID "YOU UR ILLEGALLY THERE ON OUR LAND" - THEY ARE IRISH CANT UNDERSTAND WHAT THEY ARE SAYING	04/08/2016 08:58:39 5377	14	QUESTION
QUESTION: Have you or your family had problems like this before?	04/08/2016 08:58:39 5377	14	ANSWER
ANSWER: NO	04/08/2016 08:58:45 5377	14	QUESTION
QUESTION: Do you know who is involved, their names and where they live? If not provide numbers and descriptions.	04/08/2016 08:58:45 5377	14	ANSWER
ANSWER: CHILD ONE HAD BROWN HAIR 7/8 YEARS OLD. OLDER MALE QUITE BUILT WITH DARK HAIR, LATE 30'S, TRACKY BOTTOMS OR JEANS AND T SHIRT TYPE TOP	04/08/2016 08:59:30 5377	14	ANSWER
QUESTION: Why is it happening?	04/08/2016 08:59:30 5377	14	QUESTION
ANSWER:	04/08/2016 08:59:31 5377	14	ANSWER
QUESTION: How have you or your family been affected by this?	04/08/2016 08:59:33 5377	14	QUESTION
ANSWER:	04/08/2016 08:59:33 5377	14	ANSWER
QUESTION: Anyone who can support you?	04/08/2016 08:59:33 5377	14	QUESTION
ANSWER:	04/08/2016 08:59:33 5377	14	ANSWER
QUESTION: Have you been in contact with any other agencies? If YES who?	04/08/2016 08:59:33 5377	14	QUESTION
ANSWER:	04/08/2016 08:59:33 5377	14	ANSWER
Final question (Qset finished?) automatically answered	04/08/2016 08:59:33 5377	14	QUESTION
INFORMANT IS STILL OUT WALKING HER DOG - THE BACKTRACK - GOES UP THE BACK AND LEADS YOU	04/08/2016 09:00:01 5377	14	REMARKS

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Incident Report / WK-20160804-0078 / WK-2016-0093980

WHERE THE RUGBY CLUB IS	04/08/2016 09:00:01 5377	14	REMARKS
INFORMANT IS CONCERNED AS SHE HAS TO WALK BACK THAT WAY	04/08/2016 09:00:13 5377	14	REMARKS
* PRIORITY - NECESSARY TO PREVENT/REDUCE HARM	04/08/2016 09:00:13 5377	14	REMARKS
Transfer To OlnORTHERN From Workstation 14	04/08/2016 09:00:15 5377	14	REMARKS
Control	04/08/2016 09:00:17 5377	14	SYSTEM
Person searched:	04/08/2016 09:00:36 5377	14	SYSTEM
Person selected:	04/08/2016 09:00:46 5377	14	SYSTEM
CALLER	04/08/2016 09:01:01 5377	14	REMARKS
Cross Referenced By Incident WK-20160803-0355	04/08/2016 09:02:03 5933	31	SYSTEM
Transfer Accepted At Workstation 50 For Control	04/08/2016 09:02:34 5320	50	SYSTEM
CTRL- SNT ON DUTY LATER TODAY.	04/08/2016 09:12:00 5933	31	REMARKS
Priority changed from PRIORITY to SCHEDULED - reason SITUATION UPDATE RCVD	04/08/2016 09:30:25 5933	31	SYSTEM
SNT ON DUTY THIS AFTERNOON	04/08/2016 09:30:25 5933	31	SYSTEM
* Arrests * Cautions * Reports	04/08/2016 10:15:59 5320	50	DISPOSE
DISPOSAL CODE-: AS23.1	04/08/2016 10:15:59 5320	50	DISPOSE
NSIR Qualifiers: OT1.1	04/08/2016 10:15:59 5320	50	DISPOSE
WK-20160804-0078 HAS BEEN DISPOSED OR DEFERRED	04/08/2016 10:15:59 5320	50	DISPOSE
Reason for Print:HH	15/11/2018 08:47:04 5904	DTE05570	SYSTEM

--- Relations ---
CALL CARD - XREF CALL
PERSON - CALLER

WK-20160803-0355 (N51H) ASSOCIATED BY OPERATOR 5933

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Statement on behalf of the
Claimant
Witness: William Maxwell Hunt
Rose
1st Statement
Dated: 20 November 2020
Exhibits: "WMHR1-2"

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN
AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

**(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS
IN SCHEDULE 1 OF THE CLAIM FORM**

**(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

WITNESS STATEMENT OF WILLIAM MAXWELL HUNT ROSE

I, WILLIAM MAXWELL HUNT ROSE, a Partner at Sharpe Pritchard LLP of Elm Yard, 10-16 Elm Street, London, WC1X 0BJ

WILL SAY as follows:-

1. I make this witness statement on behalf of the Claimant Nuneaton and Bedworth Borough Council (NBBC). I note the Order of Nicklin J dated 3 November 2020 (the “Order”), I make this witness statement in compliance with the Order, in particular paragraph 1 of the Order.

Brief Background Facts to the Claim

2. It should be made clear from the start that the Council has not sought a broad Persons Unknown injunction in the same manner as the London Borough of Bromley in the *Bromley* case. The Council’s claim provided evidence of much greater harm to the environment and the businesses and inhabitants of NBBC, and is more akin to the injunction obtained in *Harlow v Stokes and Others*, and *Harlow v McGinley and Others*, which the Court of Appeal in *Bromley* accepted was appropriate (see paragraphs 39 a and 39 C and 107 of the Judgment). This is apparent from the Judgment which I exhibit at **WMHR 1**.
3. The Claim as far as it is against Persons Unknown does not prevent Persons Unknown encamping in the Borough generally. Further, NBBC has for some time operated a tolerance policy with respect to unauthorised encampments, and following *Bromley* has resolved to operate a negotiated stopping policy, which provides Travellers the ability to enter into stopping arrangements with the Council at suitable sites across the Borough.
4. The Claimants experienced 103 unauthorised encampments within the Borough of Nuneaton and Bedworth between April 2015 and the end of 2018. The encampments caused significant nuisance to businesses and inhabitants of the First Claimant’s administrative area. The Claimants attempted to manage these encampments by issuing a section 77 Criminal Justice and Public Order Act 1994 (CJPOA) direction, requiring the Defendants to leave the land, and through the police exercising their section 61 CJPOA powers directing the Defendants to leave the land. Whether the encampment is removed from a site by the Claimants or the police, on many occasions the encampment simply moved to another site within the First Claimant’s administrative area, necessitating the whole process to start again.

5. The sites targeted by the Defendants have included open green space, business sites, sports and recreation areas, car parks, sites close to schools. A number of these sites were accessed by the Defendants through forced entry, causing damage to land and property. By the time the Claimants or the police managed to move the Defendants from the sites, the sites are frequently found to have been fly-tipped with commercial and household waste. Human excrement and soiled materials will usually be found on the site, these are prejudicial to health. Where the travellers' have been approached by members of the public and officers, there has been at times serious threats of violence and intimidation. The travellers' conduct has also led to school closures and other adverse impacts on schools. An overview of the impacts suffered across the borough prior to the injunction can be found in the witness statement of Philip Richardson at Exhibit **WMHR 2**.

6. Accordingly, the Claimants issued proceeding for an interim and final injunction pursuant to section 222 Local Government Act 1972 and pursuant to section 187B Town and Country Planning Act 1990. The interim injunction was ordered by Timothy Straker QC (sitting as a Deputy Judge of the High Court). The Order sought is only a borough-wide order as far as it relates to named Defendants. In relation to Persons Unknown, it is limited to identified parcels of land within the First Claimant's administrative area that have experienced a significant number of the encampments or are vulnerable to encampments. It is important to note that the Order does not seek to prohibit any Defendant from:
 - (i) Entering Nuneaton and Bedworth Borough or any part of it;

 - (ii) Encamping lawfully in the Borough of Nuneaton and Bedworth on an authorised travellers site, or, in accordance with the Tolerance Policy and now the Negotiated Stopping Policy. It simply seeks to prohibit further unauthorised encampments from forming within the area marked in red on the attached map where no permission to remain on the sites has been granted; and

 - (iii) Encamping within the First Claimant's administrative area whilst their welfare needs are assessed.

7. Welfare checks have been undertaken at all encampments, and none of the named Defendants have come forward with requests for assistance with housing or other needs. Accordingly, there is no evidence that suggests that the Defendants have no option but to encamp on sensitive sites.

8. As stated above the Order sought against Persons Unknown is more limited. The reasons for the more limited prohibitions being as follows:
 - (i) The Claimants recognises that many gypsies and travellers have a nomadic way of life and such an approach in a Borough the size of Nuneaton and Bedworth would be disproportionate;

 - (ii) It is impossible to be certain of the needs of all Persons Unknown who enter the Borough with Gypsy and Traveller status. Accordingly, the Claimants accepts it would not be appropriate to prohibit Persons Unknown from forming unauthorised encampments anywhere within the Borough, which would prevent their welfare issues being assessed and prevent any form of nomadic lifestyle. A balance must be struck between the unknown needs of Persons Unknown, the traveller way of life, and the interests of the wider community;

 - (iii) The approach is in accordance with court orders granted in the similar case of Harlow DC v Stokes and Harlow DC v McGinley & Others [2017] EWHC. These cases were expressly approved by the Court of Appeal in *Bromley*;

 - (iv) The sites which the Claimants seeks to protect from Persons Unknown include sites which have been targeted by the unauthorised encampments complained of in these proceedings, or, are sensitive/vulnerable sites where encampments are not appropriate in any event;

9. A detailed equalities Impact Assessment was undertaken and provided to the Court at the interim stage, and careful consideration was given to the decision to proceed with the application for an injunction.

The Court Order dated 3 November 2020

10. I note the Order of 3 November 2020 of Nicklin J. I can confirm that there has been full compliance with Paragraph 5 of the Order for alternative service of the Claim Form. At the interim hearing boxes containing all certificates of service for both the Land and the named Defendants were taken to hearing, and I understand that the Judge asked Counsel for the Claimants to confirm that all parties had been served and to hand-up a random sample of the certificates of service. Counsel will be in attendance at the CMC in these proceedings and can confirm the same.

11. I can also confirm that the Land was served with the Claim Form and the injunction Order. The documents were contained in clear transparent envelopes and were clearly legible and remain legible. Of course, once the Land is served the Order has been complied with, however, the Council takes the further steps of:

(i) Undertaking regular checks to ensure that these Orders remain in place and replacing them if they are removed/defaced;

(ii) Providing any encampment that stops in breach of the Order a copy of the injunction, the Council (with the police if necessary) attend the encampment and explain carefully to the members of the encampment the terms of this Order and then allow the Defendants time to leave. This has been more difficult since the COVID-19 pandemic, as a result of social distancing requirements and risks posed by coronavirus. During the pandemic there have been three encampments within the Borough – these have been attended to by the Police. No welfare issues were reported to the Council in relation to these encampments and the groups would have been made aware of the Injunction Order by the Police and they left within a day or two.

(iii) Posting copies of the Order on the Council's website is not a requirement under the Order, but the Council undertakes this in addition to the alternative service order;

Why the Claimants have not Progressed the Claim to Final Hearing

12. The Council has been very aware of the need to progress the claim to final hearing, and this matter would have been listed for final hearing this term, but for the current case following the Courts decision in the *Enfield* case and the Courts subsequent orders.

Indeed, the Council wishes to bring the matter back before the Court, but is unsure as to whether it should do so pending these proceedings, as it seems that further relevant guidance is likely to be issued by the Court.

- (i) A period of time was given to allow for representations to come forward from the traveller community either formally through the Court process, or, directly to the Council.
- (ii) We were aware that the *Bromley* case had been appealed to the Court of Appeal, we considered it prudent to await the outcome of the case, as proceeding to final hearing whilst there was a challenge in the Court of Appeal against the Persons Unknown aspect of the *Bromley* injunctions seemed inappropriate.
- (iii) The decision in *Bromley* was handed down towards the middle of February 2020 a telephone conference was arranged with our Counsel. The Claimants decided that the Council ought to proceed, on reviewing the decision in *Bromley* we concluded that we were in line with the Court of Appeal guidance. In particular, because:
 - (a) We provide a transit provision through our tolerance policy and now a negotiated stopping agreements;
 - (b) Persons Unknown are not prohibited from stopping in the majority of the Borough (unlike in Bromley);
 - (c) The Claimants continue to undertake welfare checks regardless of the injunction and liaise with the Traveller community through the welfare check process. I am not aware that the Claimant has failed to respond to any correspondence from those representing the interests of travellers, save that there is an outstanding request from NFGLG asking the Claimants to withdraw the injunction which makes claims of findings in *Bromley* that were not made by the Court of Appeal. That was not addressed as it was something that the Claimants Counsel was considering, which was

overtaken by events set out below. It will of course be addressed as soon as we fix a date for the final hearing;

(d) The Claimants have undertaken a detailed EQIA.

In mid-February this year Counsel became ill with a respiratory condition and by the end of February had been taken into hospital, which meant she was unable to assist further until late March.

(iv) By late March the Country was in lockdown as a result of the current pandemic and it was not possible to proceed with finishing off the evidence. I do not believe that many people are aware of the tasks placed upon most Council officers during lockdown, as they were taken away from their day to day jobs and placed on COVID-19 task forces the relevant officers faced the following additional responsibilities:

(a) the Private Sector Housing, Communities and Car Parking Teams and whose officers were required to assist with finalising the evidence of the final injunction had their resources diverted to deliver activities related to responding to the pandemic. They were deployed to setting up food hubs in the local area supporting residents in care homes and those shielding. Officers were assisting with creating food distribution lists and updating them daily, contacting everyone on the list to determine the help they needed in terms of food, health and well-being, including taking calls from concerned residents and sign-posting them to relevant support agencies such as the NHS, community groups and foodbanks.

(b) Additional activities undertaken by the team have also included advising private sector landlords about infection control measures in houses in multiple occupation and enforcement activities where those landlords have not complied;

(c) supporting local foodbanks and community groups;

(d) Housing everyone who was homeless in temporary accommodation.

(e) The officers on returning to their normal duties have had to clear the backlog of work and this has proved to be more challenging than normal as they are having to undertake many of their duties and site inspections by remote and alternative means all of which is time consuming.

These tasks had to be undertaken by local authority officers in addition to other duties, without the support of an office and no additional staff. Many officers across the Council have been unable to return to normal duties and have had an enhanced role in emergency response and community recovery activities due to the further lockdown.

13. Legal Officers have also been required to advise on a raft of emergency legislation caused by the pandemic. As I state this has not been supported by additional staff, and indeed staff have been further under resourced every time a colleague has had to self-isolate or unable to work.

14. Accordingly, there has certainly been no intention to abuse the Court process, the Claimants would have restored its Claim for final hearing after the Court of Appeal decision in *Bromley*, had it not been for the pandemic. The Claimants had intended to restore the Claim this term, when it received notice of the *Enfield* decision and the Court orders leading to this hearing.

15. Since the pandemic, the Claimants have also considered the *Canada Goose* case. The Claimants, however, brings their claim under Section 187B Town and Country Planning Act 1990 and considers that it is within an exception to the limitations on Persons Unknown, as it has a statutory right to an injunction. This was not expressly considered by Lord Sumption in *Cameron v Liverpool Insurance Co Ltd [2019] UKSC 6*, although as noted in *Canada Goose* Lord Sumption does confirm and approve the Court of appeals decision in *South Buckinghamshire v Gammell [2005] EWCA Civ 1429*, which concerns a statutory right to an injunction under section 187B Town and Country Planning Act 1990 against a newcomer, and the right to enforce the order against a newcomer who breaches the injunction after the order has been made.

16. Accordingly, considering the application is pursuant to section 187B and the claim is in line with the guidance in *Bromley*, the Claimants are of the opinion that they comply with the requirements in both *Bromley* and *Canada Goose*, and that it is appropriate to proceed with its claim at final hearing. The Claimants, are however, hesitant to proceed when the High Court is undertaking such a significant exercise in these proceedings, and considers it appropriate to at least understand further the High Court's intentions in relation to these cases prior to proceeding any further, which it assumes will be become apparent at the CMC.

Statement of Truth

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: 

Printed: William Maxwell Hunt Rose

Dated: 20 November 2020

Statement on behalf of the
Claimant
Witness: William Maxwell Hunt
Rose
1st Statement
Dated: 20 November 2020
Exhibits: "WMHR1-2"

IN THE HIGH COURT OF JUSTICE

Claim No. QB-2019-000616

QUEEN'S BENCH DIVISION

B E T W E E N : -

**(1) NUNEATON & BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL**

Claimants

-and-

**(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS
IN SCHEDULE 1 OF THE CLAIM FORM
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

**THIS IS THE EXHIBIT MARKED "WMHR1" REFERRED TO
IN THE WITNESS STATEMENT OF WILLIAM MAXWELL HUNT ROSE**

Nuneaton and Bedworth Borough Council Warwickshire County Council v Thomas Corcoran & Ors.



Positive/Neutral Judicial Consideration

Court

Queen's Bench Division

Judgment Date

19 March 2019

No. QB-2019-000616

High Court of Justice Queen's Bench Division

[2019] EWHC 917 (QB), 2019 WL 01246661

Before: Mr Timothy Straker QC (Sitting as a High Court Judge)

Tuesday, 19 March 2019

Representation

Ms Bolton appeared on behalf of the Applicants.

The Respondents did not attend and were not represented.

Judgment

Mr Straker QC:

1. This is an application for interim injunctive relief in which the claimants are the Nuneaton and Bedworth Borough Council and the Warwickshire County Council. Both councils are local planning authorities; between them they are authorities for other matters, such as, in the case of Warwickshire County Council being the social services authority and the education authority. The defendants are Thomas Corcoran and 52 other named defendants together with persons unknown. The named defendants are recorded in schedule 1 to the claim form which was issued on 22 February of this year. I should say that Dove J provided on that date for the manner of service and the way in which that was to be achieved by order stamped 22 February 2019.

2. I should also say that of the 53 named defendants, some four have not been able to be served. All the others have been served in accordance with the order of Dove J and I am satisfied of that by virtue of having seen specimen evidence concerning one of those defendants which is representative across the whole number who have been served. I am completely satisfied that service has been effected in the way described by Dove J and the same holds true for the service required in respect of persons unknown.

3. As far as those four who have not been served, it is proposed and I agree with this proposal that the numbering system is not altered in these proceedings but in respect of those four, who are using those numbers, numbers 14, 28, 36, and 37, that

liberty to continue to attempt to serve on those four, but for the moment they will not be subject to the order. However, they can be brought in, subject to service, when the final order comes to be considered.

4. Both councils undoubtedly have power to institute proceedings in the interests of the inhabitants of their areas. Such is given by [section 222 of the Local Government Act 1972](#) and both, as local planning authorities, can institute proceedings under [section 187B of the Town and Country Planning Act 1990](#) .

5. In considering this application, I have reminded myself of the principles in *American Cyanamid v Ethicon* and I have also reminded myself, although it formed part of this case prospectively in terms of the final order, of the approach to [section 187B](#) in *South Bucks District Council & Anor v. Porter [2003] 2 AC 558* . I have also been provided with a helpful bundle of authorities prepared by Ms Bolton, who appears for the councils, which includes a judgment by the late Patterson J dated 3 March 2015, [2015] EWHC 953 (QB), in which she had to consider an application by Harlow District Council and Essex County Council for an interim injunction under [section 222 of the Local Government Act 1972](#) and [187B of the Town and Country Planning Act 1990](#) against 35 known defendants and persons unknown. That statement by itself reveals the similarities between what happened in that case and what is happening in the circumstances which confront me.

6. It is just worthwhile my drawing attention to certain matters Patterson said and certain matters with which she was dealing. She described how, from 8 October 2013, members of certain traveller families had come to Harlow. Predominantly they were members of the McGinley and Stokes family but they were not exclusively from those family groups. The pattern had been for families to establish themselves in one encampment, the local authority and police then take action against them, move them on, the encampment disburses, and then reappears in another part of the district and then the process starts over again. Over the last 17 months, she said numerous attempts had been made through the use of other powers but, in particular, the [Criminal Justice and Public Order Act 1994](#) to move the families on but all attempts had failed. In total, Patterson J was told that there had been 109 encampments to date within the district of Harlow. The encampments had taken place on a mix of public and private land. At times there have been encampments of up to 280 people in 69 caravans with associated vehicles and animals including dogs and horses. None of the encampments had planning permission nor has it been the subject of any application for planning permission.

7. Patterson J recorded the consequences of those particular matters and I do not need to recite those consequences as they existed in the case of *Harlow* . The position as it presented itself before Patterson J was, as she said in para.15 of her judgment, that the defendants were served in accordance with an *ex parte* order obtained from Walker J on 20 February 2015 - here there has been an *ex parte* order from Dove J - and she was satisfied that all had been duly served and appropriate steps had been taken in relation to those persons unknown. I am likewise satisfied, save for the four, who have been drawn to my attention. None attended court in the case of Patterson J and the same is true here.

8. The submission Patterson J recorded as made by the claimants was that in the circumstances, it was expedient to grant a district-wide injunction. She records the size of Harlow and then she went on to say:

"It is, of course, a matter of fact and degree as to whether a district wide order, as is sought, is proportionate."

9. She had no doubt, as a result of the circumstances she set out, that the order sought was both necessary and proportionate. First, there was a clear breach of planning control for some 17 months and it was reasonable to apprehend further breaches. Second, persistent efforts by the public authorities to deal with the problem by other means had failed. Third, the approach of the local authority hitherto had been expensive to the public purse, both in terms of money, but more significantly in terms

of time spent. Fourthly, although it appears in para.17 as "third", the consequences of the unlawful behaviour and breach of planning control were not conducive to the best interests of other law-abiding residents within the district.

10. I should add that that was an interim injunction. It is perfectly plain that Mr Goudie QC, sitting as a High Court Judge on 16 December 2015 granted final injunctive relief. The case then went back to the High Court in front of Jay J who was perfectly satisfied that it was appropriate for the order to be made. It is worthy of note that he drew attention to the fact that it could be argued that an injunction created difficulties for districts, boroughs, and county councils elsewhere. In other words, that one simply moves a problem from one place to another. Jay J recorded at [28] of [2017] EWHC 1851 that there was some force in the argument but only some force. It was open to other county councils or, indeed, to others to take appropriate action on the available evidence. That is the better way forward, Jay J said, rather than to deny the claimants in the case before him, Harlow in particular, the relief that was being sought. In this case, I have been told that the surrounding boroughs and authorities have been informed of and are aware of these proceedings and, in my view, it is perfectly sensible that they have not sought to intervene and also perfectly sensible and proper that they should have been told so that I could have been informed had there been any expected problems from relief being granted in the manner sought.

11. This being an interim application, I do not propose to enter into a detailed recitation either of the law or the facts. However, the starting point is that Nuneaton and Bedworth Borough Council has as its administrative area a part, but proportionally quite a small part, of the area of Warwickshire County Council which plainly embraces a number of other districts or borough councils. Between April 2015 and December 2018, there have been some 103 unauthorised encampments within the area of Nuneaton and Bedworth.

12. The problem is well described within Ms Bolton's skeleton argument for the councils. She records that number of unauthorised encampments within that space of time and then records, and all this is verified by evidence which is before me, that the encampments have caused significant nuisance to businesses and inhabitants of the first claimant's administrative area. The claimants have attempted to manage these encampments by issuing a [section 77 Criminal Justice and Public Order Act](#) direction requiring the defendants to leave the land and through the police exercising their [section 61 Criminal Justice and Public Order Act](#) powers directing defendants to leave the land. Whether the encampment is removed from a site by the claimants or by the police, on many occasions the encampment simply moves to another site within the administrative area of the Nuneaton and Bedworth Borough Council so the whole process starts again. That is precisely paralleled by the circumstance before Patterson J in the *Harlow* case.

13. Ms Bolton records, and once again this is all supported by evidence before me, that the sites have included open green space, business sites, sports, and recreation areas, car parks, and sites close to schools. I pause there to observe that Warwickshire County Council is a claimant before me. Warwickshire County Council is the education authority for Warwickshire and so has to take a particularly close concern for those matters which arise close to schools for, plainly, it is capable of adversely affecting the education of the children for whose education the Warwickshire County Council are responsible.

14. The sites have, in various places, been accessed through forced entry causing damage to land and property. By the time action comes to be taken by the claimants or by the police, sites are frequently found to have been fly tipped with commercial and household waste. Human excrement and soiled materials are usually found on the site and those, of course, are prejudicial to health. Once again, this is all evidenced before me. There have been occasions of threats of violence and intimidation when travellers have been approached by members of the public and officers and, furthermore, such conduct has led to school closures and other adverse impacts on schools. Once again, this is all evidenced before me.

15. Consequently, the position is one whereby the relief that is sought in these proceedings is claimed and that includes interim injunctions pursuant to [section 222 of the Local Government Act](#) and pursuant to [section 187B of the Town and Country Planning Act](#) pending hearing of the claim for a mandatory injunction. [Section 187B of the Town and Country Planning Act](#) is, of course, well-known in that it enables, whether or not other planning steps are being taken, a local planning authority to seek the assistance of the court in dealing with either an actual or apprehended breach of planning control.

16. On the face of it therefore, as it seems to me, the councils are perfectly entitled to seek the assistance of this court and injunctive relief to try and overcome this problem which I have briefly and probably inadequately described. I should add that the claimant seeks a power of arrest to be attached to the prohibition pursuant to [section 91 of the Antisocial Behaviour Act 2003](#).

17. I should note that the order has mainly been carefully drawn bearing in mind the experience which has confronted those who have sought injunctions in this type of process before and, in particular, in the *Harlow* case and, I have been told, subsequent cases to that. It can be noted that provision is made in the terms of the order so as to enable welfare properly to be considered, in particular, welfare of children for in considering these matters, it is incumbent upon the court to bear in mind the impact on children of coercive orders of the court, for the courts, in my judgment, should not seek to visit on children the sins of their parents. However, nonetheless, sometimes one has to take firm steps in order to achieve a clear objective and this is one such case.

18. Accordingly, I am completely satisfied that it is proper for injunctive relief to be given. I should just add to that that I have recorded some of the impacts. These are helpfully identified in the evidence and they include matters to which I have touched already but they also include impact on open green space and damage to land and financial costs. I also repeat the point that I have drawn attention to about the impact on schools with some schools having to close as a direct result of the conduct that I have described.

19. So, in those circumstances, I will make the order sought. I should add that I have already had a discussion with Ms Bolton about the precise terms of that order and ensuring that it is as clear as clear may be, and I shall resume that discussion now.

Crown copyright

Statement on behalf of the
Claimant
Witness: William Maxwell Hunt
Rose
1st Statement
Dated: 20 November 2020
Exhibits: "WMHR1-2"

IN THE HIGH COURT OF JUSTICE

Claim No. QB-2019-000616

QUEEN'S BENCH DIVISION

B E T W E E N : -

**(1) NUNEATON & BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL**

Claimants

-and-

**(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS
IN SCHEDULE 1 OF THE CLAIM FORM
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

**THIS IS THE EXHIBIT MARKED "WMHR2" REFERRED TO
IN THE WITNESS STATEMENT OF WILLIAM MAXWELL HUNT ROSE**

On behalf of: The Claimants
 Witness statement of: Philip Richardson
 No of statement: 2nd
 Dated: 21st February 2019
 Exhibits:

IN THE HIGH COURT OF JUSTICE

Claim No: QB - 2019 - 000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B
 TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & [52] OTHER NAMED DEFENDANTS IN SCHEDULE 1 OF THE
 CLAIM FORM

(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE
 BOROUGH OF NUNEATON AND BEDWORTH

Defendants

WITNESS STATEMENT OF PHILIP RICHARDSON

I, PHILIP RICHARDSON, Director of Arts Leisure and Democracy of Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton CV11 5AA WILL SAY AS FOLLOWS:

1. I make this witness statement in support of the Claimants' application for various service Orders prior to service of the above named proceedings. The Claimants seeks an interim and mandatory injunction pursuant to section 222

Local Government Act 1972 and/or section 187B Town and Country Planning Act 1990, in the terms set out in the draft Order. The Order is sought against 54 herein named Defendants and Persons Unknown, and concerns to date 103 unauthorised encampments over a period of three years, formed by the Defendants within the area marked with the red line on the map attached at Schedule 2 of the draft order for an injunction. These encampments have included adults, children horses, dogs and other associated vehicles and animals. The unauthorised encampments have been formed in public open spaces, near schools and children's play areas, residential estates, industrial sites, car parks and on highways within the area marked in red on the map referred to above. The encampments have caused significant nuisance and community tension for the following reasons:

- (i) Because the settled community believe that the Travellers are being allowed to flout the law;
- (ii) The encampments are causing serious nuisance and annoyance to the settled community, including significant noise, damage to amenity land and fly-tipping; and
- (iii) The encampments leave behind untreated human excrement as the Travellers do not use the toilets within their own caravans. Human excrement has been found on many of the sites the Defendants have formed encampments as referred to in my first witness statement dated 19th February 2019 at paragraph 21 to 25. This has also been identified as a risk to human health in the witness statement of Robert John Watson.

Due to the level of encampments and the time it might take to locate and serve this evidence on the Defendants I am seeking an Order on behalf of the Claimant that the injunction is listed before a Judge on 19 March 2019, to ensure the Council has 3 clear days between service of the proceedings and

the hearing date. I would also respectfully request that the hearing is allocated a 2 hour time estimate.

3. Male Gypsies and Travellers usually leave for work early in the morning and do not return until later in the evening. Accordingly, the Claimants also seek permission to serve the Defendants between 6.30am and 8pm during the week and between 7am and 4pm on a Saturday. With an Order that claim forms and applications served on a Saturday will be deemed served on the next working day and Claim Forms and Applications served after 4pm on a working day shall be deemed served on the next working day.
4. Travellers can be difficult to serve and there is no guarantee that they will open the door to their caravan, mobile home, or, bricks and mortar property if they believe they will be served with court papers. In the event that the Claimants are unable to personally serve any of the 1st to 54th Defendants, the Claimants seeks an order giving them permission pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 to serve any of these Defendants that cannot reasonably be personally served, by leaving a copy of the application notice, claim form, draft order and supporting evidence in a clear transparent envelope and affixing the same to a Caravan or Mobile home, front door, or, other vehicle of which it is reasonably believed is occupied by the Defendant, or, posting the same through the letter box of the Defendants last known address. I would also respectfully request that any claim form and application notice served by this method will be deemed served the next business day after service of the application and Claim Form .
5. There are a number of lever arch files of supporting evidence in this matter. There are 54 named Travellers that each require a copy of the evidence to be served on them and 141 sites that need serving with the supporting evidence to address the part of the evidence that relates to the claim against Persons Unknown. This would be an enormous amount of paper works and expense which no doubt would be difficult for the Travellers to store in their caravans as many of them are living in small touring caravans with their families.

Accordingly, the Claimants proposes that it shall be permitted to serve the evidence in support of the Claim and application for an interim injunction (contained in a number of lever arch files) by USB memory stick and digital link to a webpage on the First Claimant's website and shall provide any Defendant that requests hard copies of the same within 2 workings days of receipt of such request and shall have a copy of all evidence relied upon in these proceedings available for inspection at the Council offices at Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA between the hours of 10am and 4pm Monday to Friday excluding public holidays.

6. The Claimant also seek an Order that the Claim Form and applications shall be deemed served on Persons Unknown by serving a copy of the Claim Form, Application Notice as follows:

(a) Affixing copies of the same in a transparent envelope, or laminated copy, in a prominent position on the land to be protected against Persons Unknown, which includes 141 of sites identified in Schedule 3 of the draft Order for the injunction with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from Legal Services, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA within 2 working days of receipt of such a request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the Council offices at Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA between the hours of 10am and 4pm Monday to Friday, excluding public holidays.

STATEMENT OF TRUTH

I believe that the contents of this statement are true.

Signed 

Philip Richardson – Director of Arts, Leisure and Democracy.

Dated 21/2/2019

Statement on behalf of the Claimant
Witness: Philip Richardson
Dated: 14 June 2021

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN
AND COUNTRY PLANNING ACT 1990

B E T W E E N:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS
IN SCHEDULE 1 OF THE CLAIM FORM

(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

(1) LONDON GYPSIES AND TRAVELLERS
(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIAISON GROUPS

Interveners

WITNESS STATEMENT OF PHILIP RICHARDSON

I, PHILIP RICHARDSON, Director of Democracy, Planning and Public Protection at Nuneaton and
Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA

WILL SAY as follows:-

1. I make this witness statement pursuant to the Order of Nicklin J dated 24 May 2021 (the "Order"), I make this witness statement in compliance with the Order, in particular paragraph 3 of the Order.
2. Having made enquiries of the Officers of the First and Second Claimant, the Claimant confirms that the following steps have been taken in compliance with paragraph 2 of the Order as directed by Nicklin J, namely:-
 - i) The Interim Injunction Order dated 19th March 2019 has been removed from the first Claimant's website;
 - ii) The Order dated 24th May 2021 has been placed on the website with a notice confirming that the Power of Arrest contained in the Interim Injunction Order against persons unknown has been discharged by the Order;
 - iii) All copies of the Injunction Orders at the sites referred to in Schedule 3 of the Injunction Order have been removed.
 - iv) The Second Claimant has emailed all schools covered by the injunction and asked that where any of them display a copy of the interim injunction on their sites that these be removed forthwith.

Statement of Truth

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



Philip Richardson

Dated 14th June 2021

Statement on behalf of the
Claimant

Witness: Philip Richardson

Dated: 19/07/2021

Exhibits:

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE NICKLIN

B E T W E E N:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2) –(53) NAMED DEFENDANTS
(54) PERSONS UNKNOWN

Defendants

-and-

(1) LONDON GYPSIES AND TRAVELLERS
(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIASON GROUPS

Interveners

WITNESS STATEMENT OF PHILIP RICHARDSON

I, PHILIP RICHARDSON, Director of Democracy, Planning and Public Protection at Nuneaton and
Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA

WILL SAY as follows:-

1. I make this witness statement on behalf of the Claimants Nuneaton and Bedworth
Borough Council (NBBC) and Warwickshire County Council (WCC). I note the Order of
Nicklin J dated 2 July 2021 (the "Order"), and make this witness statement in compliance
with paragraph 4 of the Order.

Brief Background Facts to the Claim

2. In February 2019 NBBC applied for an Injunction Order under s.222 of the Local Government Act 1972 and s.187B Town and Country Planning Act 1990 in respect of unauthorised encampment against 53 named defendants and persons unknown following receipt of complaints and evidence that unauthorised encampments were resulting in greater harm to the environment and the businesses and inhabitants of NBBC. A copy of the Application is attached marked 'PR 1'.
3. Based on the evidence presented to the Court, on the 19th March 2019 an Interim Injunction was granted by HHJ Timothy Straker QC preventing unauthorised encampments in the Borough against the 1st to 53rd Defendants (save for the 14th, 28th, 36th and 37th Defendants) forbidding encampments on any land within the administrative area of Borough and against Persons Unknown in respect of the land marked on the map attached to the land identified by the key attached to the map and numbered 1-141. A copy of the Interim Order is attached marked Exhibit 'PR2'
4. The Claimants experienced 103 unauthorised encampments within the Borough of Nuneaton and Bedworth between April 2015 and the end of 2018. The encampments caused significant nuisance to businesses and inhabitants of the First Claimant's administrative area. The Claimants attempted to manage these encampments by issuing a section 77 Criminal Justice and Public Order Act 1994 (CJPOA) direction, requiring the Defendants to leave the land, and through the police exercising their section 61 CJPOA powers directing the Defendants to leave the land. Whether the encampment is removed from a site by the Claimants or the police, on many occasions the encampment simply moved to another site within the First Claimant's administrative area, necessitating the whole process to start again.
5. The sites targeted by the Defendants have included open green space, business sites, sports and recreation areas, car parks, sites close to schools. A number of these sites were accessed by the Defendants through forced entry, causing damage to land and property. By the time the Claimants or the police managed to move the Defendants from the sites, the sites are frequently found to have been fly-tipped with commercial and household

waste. Human excrement and soiled materials will usually be found on the site, these are prejudicial to health. Where the travellers' have been approached by members of the public and officers, there has been at times serious threats of violence and intimidation. The travellers' conduct has also led to school closures and other adverse impacts on schools. An overview of the impacts suffered across the borough prior to the injunction can be found in the witness statements filed in support of the application.

6. The Application or the interim Order did not seek to prohibit any Defendant from:

(i) Entering Nuneaton and Bedworth Borough or any part of it; and

(ii) Encamping lawfully in the Borough of Nuneaton and Bedworth on an authorised site, or, in accordance with the Tolerance Policy and now the Negotiated Stopping Policy. It simply seeks to prohibit further unauthorised encampments from forming within the area marked in red on the attached map where no permission to remain on the sites has been granted; and

(iii) Encamping within the First Claimant's administrative area whilst their welfare needs are assessed.

Why the Claimants have not Progressed the Claim to Final Hearing

7. The Council has been very aware of the need to progress the claim to final hearing, and intended to do so in the October term last year and would have done so, but for the current case following the Courts decision in the *Enfield* case and the Courts subsequent orders.

8. Following the making of the Interim Order in March 2019, it was agreed with Counsel that a period of time needed to be allowed for representations to come forward from the traveller community either formally through the Court process or directly to the Council, with an update to Counsel in September 2019 with a view to applying for the final Order in November/December 2019. I attach an email dated 25th April 2019 confirming the same, marked 'PR 3'

9. The Interim Order also made provision for the Defendants and those affected by the Order to apply to the Court and make representation, this was confirmed at paragraph 15, which stated as follows:-

“15. The Defendants may each of them, or anyone notified of this Order, apply to the Court on 72 hours written notice to the Court and the Claimant to vary or discharge this order (or so much as it affects that person)”

- 10 In so far as I am aware no such application has been made to the Court or notified to us by any of the Defendants.
- 11 We were also aware that the *Bromley* case had been appealed to the Court of Appeal, we considered it prudent to await the outcome of the case, as proceeding to final hearing whilst there was a challenge in the Court of Appeal against the Persons Unknown aspect of the *Bromley* injunctions seemed inappropriate. Our Counsel was involved in the *Bromley* case for the Fourth Intervener, and had advised us that the Court of Appeal was likely to give guidance on the proper approach to these injunctions and that we should await the outcome of *Bromley* before we sought a final order.
- 12 During this period we continued to liaise with the Dawn Dawson, Director of Housing, Communities and Economic Development and Rob Watson the then Private Sector Housing Manager with regards to collating the further evidence for the final order application and the resources and finances that would be required to obtain, serve and implement the final Order. I attach email's between officers between January 2020 and April 2020 marked 'PR 4'.
- 13 The decision in *Bromley* was handed down in late January 2020. In February 2020 we had been hoping for a telephone conference with Counsel, however, we could not arrange a telephone conference with Counsel until 23 April 2020, as: (i) Counsel had gone into hospital in mid-February 2020 with COVID; and (ii) the pandemic had created significant challenges for all local authorities.

- 14 In the meantime, in early April I had prepared a draft report to informal Cabinet seeking their agreement to proceed with the final injunction order application and advising them of the potential costs anticipated in doing so. The report was approved for reporting to formal Cabinet seeking authority to proceed with the application and agree a spend pressure of £100K towards the costs of making the application, serving orders obtained and implementing them. Report to Informal Cabinet attached marked 'PR 5'.
- 15 At the conference with Counsel on 23 April 2020, we discussed the *Bromley* criteria and concluded that we ought to proceed with a final injunction. Our Counsel, was however, still recovering and indicated that there were a number of cases which she needed to review (as she had been ill), and gave us guidance as to what more we needed to produce ahead of the final hearing, it seemed likely that this would be proceeded with in the Autumn term, due to a mixture of more being required from the local authority ahead of the final hearing, Counsel still needing to recover, and the fact that the Government had asked us not to evict unauthorized encampments during lockdown . On reviewing the decision in *Bromley* we concluded that we were in line with the Court of Appeal guidance. In particular, because:

- (a) We provide a transit provision through our tolerance policy and negotiated stopping agreements;
- (b) Persons Unknown are not prohibited from stopping in the majority of the Borough (unlike in *Bromley*);

We continue to undertake welfare checks regardless of the injunction and liaise with the Traveller community through the welfare check process. I am not aware that the Claimant has failed to respond to any correspondence from those representing the interests of travellers, save that there is an outstanding request from NFGLG asking the Claimants to withdraw the injunction which makes claims of findings in *Bromley* that were not made by the Court of Appeal. That was not addressed as it was something that the Claimants Counsel was considering, having forwarded her the letter on 30 April 2020 and Counsel having concluded that a response would be better once we had the final hearing papers in place and could

explain our approach and why it differed from the *Bromley's* approach. Counsel was particularly of this view as the letter had been sent on 2 February requesting a response in 14 days, and by the time she had reviewed the letter that deadline had passed and we were not evicting travellers from sites in any event, as a result of the pandemic. It will of course be addressed as soon as we fix a date for the final hearing.

16 By late March the Country was in lockdown as a result of the current pandemic and it was not possible to proceed with finishing off the evidence. The scale of the challenge faced by local authorities in supporting the health service and other organisations has been unprecedented. Staff have been going above and beyond to help and support communities at this time.

17 The role of local authorities in providing support for vulnerable people has included

- a. Delivering essential normal services to those with existing needs, eg social care (which may change in line with the Emergency Coronavirus Act), homelessness
- b. Targeted communications with vulnerable residents about support available, including alternatives to digital, and wider resident awareness raising of public health advice
- c. Overseeing support for wider groups of vulnerable people beyond the shielded group, including those who become vulnerable due to COVID-19, eg food, medicine, shelter and social contact
- d. Working with the voluntary and community sector (VCS) to coordinate support and advice (including matching volunteers to appropriate opportunities) and facilitate community support
- e. Administering hardship funds introduced to support individuals and businesses experiencing financial hardship
- f. Certification of emergency volunteers
- g. Working with partners around roles and responsibilities for safeguarding adults and children

- h. Councils in two-tier areas will need to agree how these tasks should be coordinated locally.

18 Many officers in our Private Sector Housing team, Car Parking team, Leisure Services Team and Parks Team during lockdown, were taken away from their day to day jobs and placed on COVID-19 task forces the relevant officers faced the following additional responsibilities:

- (a) the Private Sector Housing, Communities and Car Parking Teams and who undertake the duties in collating the evidence, liaising unauthorized encampments, including the evidence for the final injunction had their resources diverted to deliver activities related to responding to the pandemic. They were deployed to setting up food hubs in the local area supporting residents in care homes and those shielding.
- (b) Officers were assisting with creating food distribution lists and updating them daily, contacting everyone on the list to determine the help they needed in terms of food, health and well-being, including taking calls from concerned residents and sign-posting them to relevant support agencies such as the NHS, community groups and foodbanks.
- (c) Additional activities undertaken by the team have also included advising private sector landlords about infection control measures in houses in multiple occupation and enforcement activities where those landlords have not complied;
- (d) supporting local foodbanks, community groups and vulnerable groups as closely as possible;
- (e) Housing everyone who was homeless in temporary accommodation as per the government guidance issued at the time.
- (f) Dealing with a high level of general enquiries about COVID-19

(g) The work continues behind the scenes and those officers returning to their normal duties have had to clear the backlog of work and this has proved to be more challenging than normal as they are having to undertake many of their duties and site inspections by remote and alternative means and within the covid guidelines all of which is time consuming.

(h) Officers have also been involved in assisting with the Covid vaccination centres and the testing sites.

These tasks had to be undertaken by local authority officers in addition to other duties, without the support of an office and no additional staff. Many officers across the Council have been unable to return to normal duties and have had an enhanced role in emergency response and community recovery activities due to the further lockdown.

19 Legal Officers were required to advise on a raft of emergency legislation caused by the pandemic. As I state this has not been supported by additional staff, and indeed staff have been further under resourced every time a colleague has had to self-isolate or unable to work.

20 The guidance from the Ministry of Housing, Communities and Local Government during this period with respect to members of the Gypsy and Traveller communities has been to support vulnerable groups who may be disproportionately impacted by the pandemic for Local Authorities to determine how best to support these vulnerable groups.

21 In October 2020, I contacted William Rose at Sharpe Pritchard with a view to setting up a further conference with Counsel to progress the application and this was confirmed for the 24th October 2020. It was in the week prior to this on 16th October 2020, that we received the Order of Nicklin J in the Enfield case. I attach a copy of the email from Mr Rose, dated 14th October 2020 confirming the further conference with Counsel marked 'PR 6'.

22 Accordingly, there has certainly been no intention to abuse the Court process, the Claimants would have restored its Claim for final hearing after the Court of Appeal decision in *Bromley*, had it not been for the pandemic. The Claimants had intended to restore the Claim in October/November last year when it received notice of the *Enfield* decision and the Court orders leading to this hearing.

23 It has always been the intention to proceed with the injunction, hence the conference call with Counsel in April 2020, and the review that we had asked Counsel to undertake. We have certainly not intended to abuse the Court process and has it not been for the pandemic, this matter would have been put back before the Court in the before Easter 2020.

Statement of Truth

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: _____

Printed: Philip Richardson

Dated: _____

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE NICKLIN

B E T W E E N:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2) –(53) NAMED DEFENDANTS
(54) PERSONS UNKNOWN

Defendants

-and-

(1) LONDON GYPSIES AND TRAVELLERS
(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIASON GROUPS

Interveners

EXHIBIT 'PR 1'

IN THE HIGH COURT OF JUSTICE

Claim Number: QB 2019 009616

QUEEN'S BENCH DIVISION

IN THE MATTER OF S22 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990

Before Timothy Straker QC (sitting as a Deputy Judge of the High Court)

On the 19th day of March 2019

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL



Claimants

-and-

(1) THOMAS CORCORAN & 53 OTHER NAMED DEFENDANTS IN SCHEDULE 1
OF THE CLAIM FORM(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTHDefendants

ORDER

IF YOU, ANY OF THE ABOVE NAMED FIRST TO FIFTY-THIRD DEFENDANTS OR PERSONS UNKNOWN DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

UPON HEARING COUNSEL MISS CAROLINE BOLTON FOR THE CLAIMANTS AND THE DEFENDANTS NOT ATTENDING

AND UPON READING THE PAPERS AND HEARING THE APPLICATION FOR AN INTERIM INJUNCTION PENDING THE FINAL INJUNCTION HEARING PURSUANT TO SECTION 222 LOCAL GOVERNMENT ACT 1972 AND 187B TOWN AND COUNTRY PLANNING ACT 1990

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST FOR BREACH OF PARAGRAPHS 1-9 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006 AND SECTION 1 OF THE ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014. ANY PERSON CAUGHT BREACHING PARAGRAPHS 1-10 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

Note to Arresting Officer: Where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or the Anti-social Behaviour Crime and Policing Act 2014 :-

- The defendant shall be brought before the judge within a period of 24 hours beginning at the time of their arrest
- A constable shall inform the person on whose application the injunction was granted forthwith where the defendant is arrested under these powers

Nothing in sections 27 of the Police and Justice Act 2006 or the Anti-social Behaviour Crime and Policing Act 2014 shall authorise the detention of the defendant after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculation any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

IT IS ORDERED THAT:

1. The proceedings shall be stayed against the 1st Defendant Terry Maughan, 28th Defendant Simon McDonough, 36th Defendant Martin Ward and 37th Defendant Pae Ward with liberty to restore.

Until further order, The First to Fifty-Third Defendants (save for the 1st, 28th, 36th and 37th Defendants) are forbidden from

1. Setting up or encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the Secretary of State.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia save for Thomas Corcoran (the First Defendant) and his wife Jessica Dadds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
5. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parking with the relevant local authority or under a lawful licence.

7. From causing or allowing to be erected, constructed, maintained or on the Land, unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.
8. From depositing or allowing to be deposited, controlled waste in or on the Land.
9. From setting up an encampment on any land identified on the attached map and list of sites without written permission from the local planning authority, or planning permission granted by the Secretary of State.
8. From entering and/or occupying any part of the land identified on the attached map and list of sites for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia.
9. From bringing onto the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with express permission from the owners of the land.
10. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.
11. There be a power of arrest attached to prohibitions 7-10 of this order.

The Land in this order means:

12. For the First to Fifty Third Defendants, all land within the administrative boundaries of Nuneaton and Bedworth Borough Council as appears within the marked red outline on the attached map at Schedule 2 of this Order. The said map clearly identifies the boundaries of the Borough of Nuneaton and Bedworth correctly and the principal towns and settlements within the Borough.
13. For Persons Unknown (the Fifty-fourth Defendant) all the land marked on the map at Schedule 3 of this Order and identified by the key to the map and numbered 1 to 141, further details of which are on the list at Schedule 3 of this Order.
14. Service of this Order shall be by affixing a copy of this Order in a transparent envelope, or laminated copy, in a prominent position on the land.
15. The Defendants may, each of them, or anyone notified of this Order, apply to the Court on 72 hours written notice to the Court and the Chairman to vary or discharge this order (or so much of it as affects that person).
16. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

- 16. A Defendant, who is an individual, who is ordered, not to do something, must not do it, either on his own or by others (e.g. the post or a third party) even using an agent, servant or household member or his animal (pet);
- 17. A Defendant, who is a corporation and which is ordered, not to do something must not do it, by its directors, employees, agents, servants or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

- 19. It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

INTERPRETATION OF THIS ORDER

- 20. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
- 21. A requirement to serve on "the Defendants" means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.
- 22. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
- 23. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990.

COMMUNICATIONS WITH THE COURT

- 24. All communication to the Court about this order should be sent to Room WC08 Royal Courts of Justice, Strand, London, WC2A 9LE (020 7947 6019).

SCHEDULE 1 – LIST OF DEFENDANTS

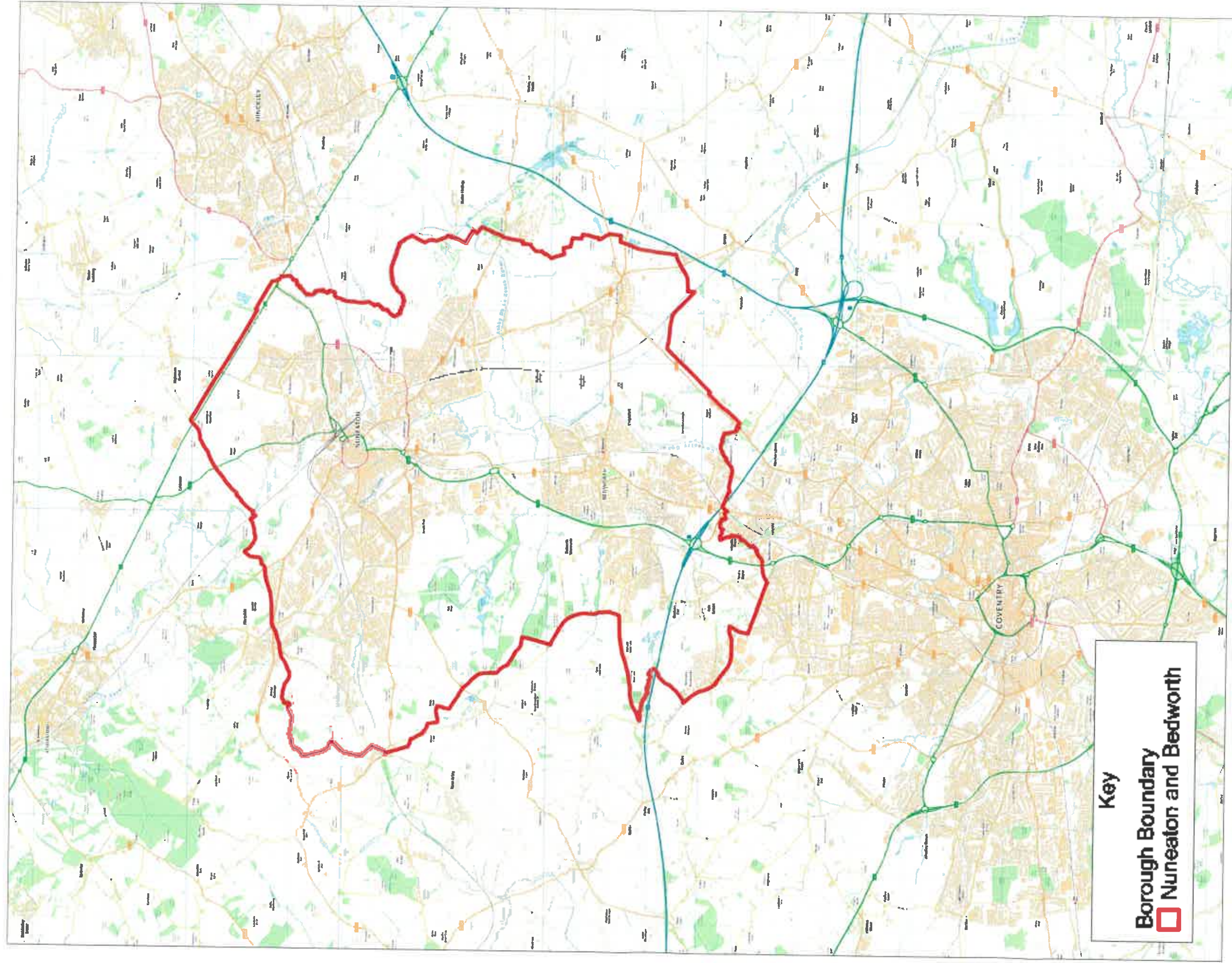
List of Defendants and their addresses

- (2) JESSICA DODD,
- (3) MICHAEL DOYLE
- (4) LUKE DELANEY
- (5) PATRICK MCGINLEY,
- (6) ALPHONSUS MCGINLEY
- (7) MICHAEL STOKES
- (8) MICHAEL STOKES
- (9) DENNIS STOKES
- (10) DENNIS STOKES (JNR)
- (11) BRIAN STOKES, 12a
- (12) JOHN MAUGHAN
- (13) TERRY MAUGHAN
- (14) TERRY MAUGHAN
- (15) PATRICK MAUGHAN
- (16) OWEN MAUGHAN
- (17) OWEN MAUGHAN
- (18) BERNARD CORCORAN
- (19) FRANCIS CORCORAN
- (20) FRANCIS MAUGHAN
- (21) MARTIN MAUGHAN
- (22) THOMAS MAUGHAN
- (23) JOHN MONGAN
- (24) MARTIN MONGAN
- (25) MARTIN MONGAN
- (26) LEONARD MONGAN
- (27) PAUL McDONAUGH
- (28) SIMON McDONAUGH
- (29) BERNARD McDONAUGH
- (30) JOHN McDONAUGH
- (31) MIKE McDONAUGH
- (32) MARTIN McDONAUGH
- (33) AARON McDONAUGH
- (34) KATHLEEN McDONAUGH
- (35) WINNIE McDONAUGH
- (36) MARTIN WARD
- (37) PAT WARD
- (38) MICHAEL WARD
- (39) KATHLEEN WARD
- (40) ROSELEEN WARD
- (41) BERNIE SWEENEY
- (42) JOHN CONNORS
- (43) TRACEY BROWN
- (44) WILLIAM BRIDGES

- (45) TOM WARD
- (46) EDDIE McDONOUGH
- (47) EDDIE (AKA EDWARD) WARD
- (48) CHRISTOPHER McDONOUGH
- (49) WILLIAM DOHERTY
- (50) GERRY O'BRIEN
- (51) ELIZABETH O'BRIEN
- (52) PEARL BLAINLEY
- (53) FIONA WARD
- (54) PERSONS UNKNOWN

SCHEDULE 2 – MAP OF THE BOROUGH

Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Not to scale

SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

SITE NUMBER	MAP BITE APPEARS ON	SITE	>5 acres	POSTCODE	Land Owner	Title Number
1 B		Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS)	x		NBBC	WK447699
2 B		Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground/Pool Bank St)	✓	CV11 5PZ	NBBC	WK448269
3 B		Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton (aka Stanley Road/Vernons Lane Recreational Ground)	✓	CV11 5ET	NBBC	WK447951/ WK240764/ WK238363
4 B		Land being car park on the south west side of Corporation Street, Nuneaton (aka Upper Abbey Street Car Park)	x	CV11 5DG	NBBC	WK448699
5 B		Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street Car Park 1 and 2)	x	CV11 5QE	NBBC	WK448585/ WK178804
6 B		Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	x	CV11 4BW	Private	WK388438
7 B		Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park)	x	CV11 5DB	NBBC	WK450184
8 B		Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park)	x	CV11 4BS	Private	WK388584
9 B		Land and buildings on the east side of Broad Street, the north side of Queen's Road and the south west side of Abbey Street (aka Abbey Street Car Park)	x	CV11 5NE	NBBC	WK251517
10 B		Land at Church Street, Nuneaton (aka Church Street Car Park)	x	CV11 4AS	NBBC	WK449878
11 B		Land and buildings lying to the East of Coton Road (aka Town Hall Car Park)	x	CV11 5AA	NBBC	WK88582
12 B		Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)	x	CV11 4AL	NBBC	WK428642
13 B		Land at Coton Road, Nuneaton (aka Riverside Car Park)	x	CV11 5AA	NBBC	WK450298
14 B		Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park)	x	CV11 5JF	NBBC	WK448678
15 B		Land to the south side of Bermuda/land lying to the east and west of Coventry Road, Chilvers Coton/land on the west side of a road leading from Coventry to Nuneaton and a balancing lake and land to the south of Bermuda Road, Nuneaton (aka Bermuda Balancing Lake)	✓		NBBC	WK448511/ WK284250/ WK345891
16 C		Recreation Ground at Easyboro Way, Nuneaton (aka Attleborough Recreational Ground)	✓	CV11 4PY	NBBC	WK449338
17 C		Land on south side of Lutterworth Road, Nuneaton (aka Pauls Land)	✓	CV11 6QA	NBBC	WK449027
18 B		Land lying to the north east of Braemer Way, Nuneaton, Land on the south west and north east sides of Greenmoor Road & Land lying to the south east side ofcroft road (aka Jubilee Sports Centre)	✓	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
19 B		Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton (aka Marsdale Drive)	✓		NBBC	WK342581/ WK355952
20 B		Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC	WK447355
21 B		Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road (aka Whittleford Park)	✓	CV10 8PY	NBBC	WK130458/ WK447033
22 E		Land on the south side of Marston Lane, Nuneaton (aka Bailey Park)	✓	CV12 8DR	NBBC	WK448180
23 E		Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓		NBBC	WK448258
24 E		Spitalfields 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the north-west side of Rye Piece Ringway, Bedworth & Zion Chapel, High Street Bedworth	x	CV12 8NF	NBBC	WK448878/ WK246825/ WK448801
25 E		Park Road (Car Park) - land on the east side of Park Road, Bedworth	x	CV12 8LH	NBBC	WK448511
26 F		Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barnacle Lane, Bulkington, Bedworth	✓		NBBC	WK448611/ WK448824(part)

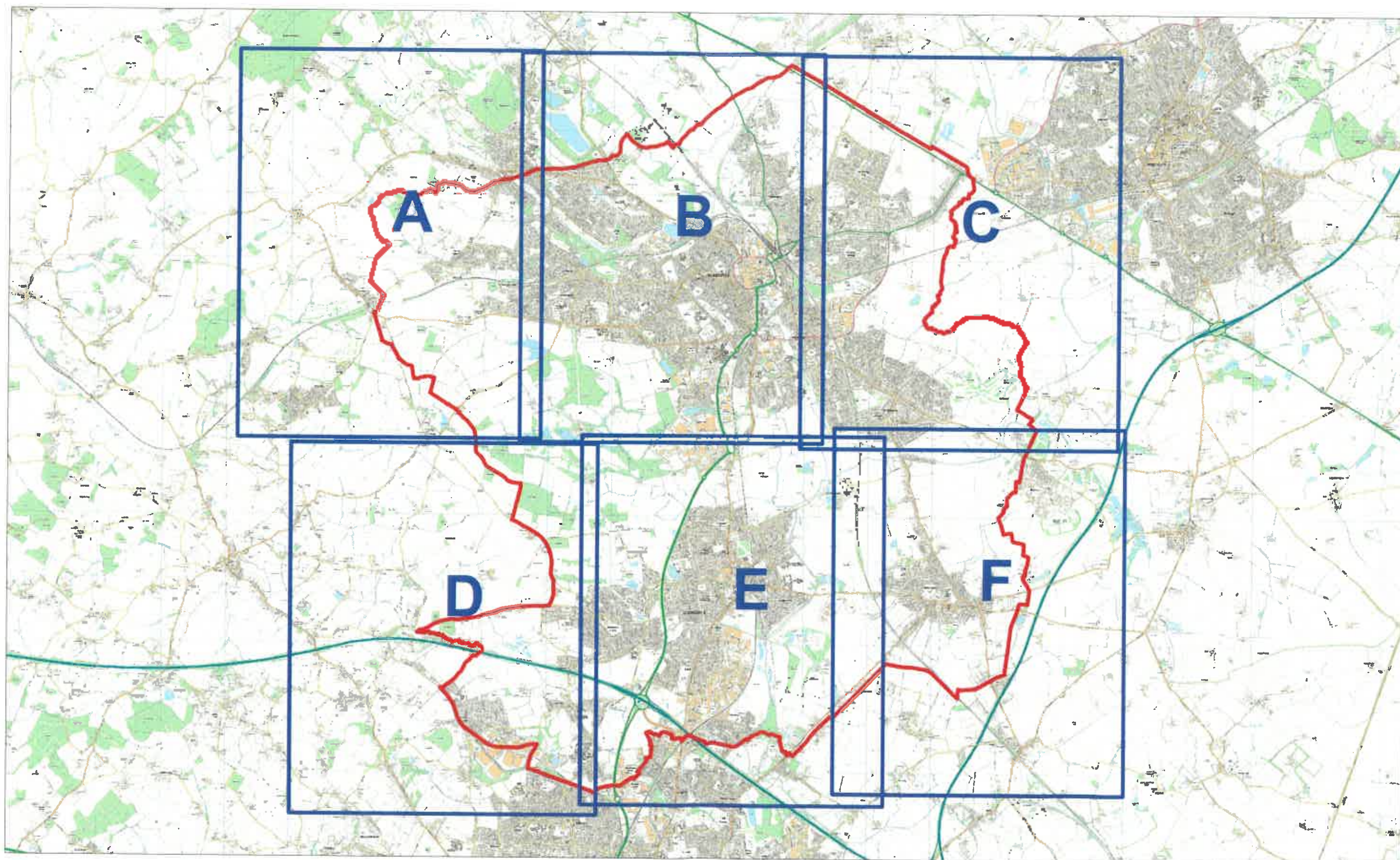
27 F	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	x	CV12 9RF	NBBC	WK448510/ WK448500
28 F	Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK448549
29 B	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK439320
30 B	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Remaden Avenue, Nuneaton (aka Stubbs Pool)	✓	CV10 9DJ	NBBC	WK448197/ WK448093
31 B	Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton (aka The Dingle)	✓	CV10 9DE	NBBC	WK373679/ WK448013
32 B	Land on the south side of Willow Road, Nuneaton	✓		NBBC	WK447731
33 D	Land on the West side of Blackberry Lane, Bedworth	✓		NBBC	WK137139
34 E	Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	✓	CV7 9EX	NBBC	WK450050
35 D	Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedworth	✓	CV7 8NG	NBBC	WK124031
36 E	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry (aka Silverstone Drive)	✓		NBBC	WK336223
37 E	St. Giles Recreational Ground - Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	x	CV7 9GZ	NBBC	WK143991/ WK154857
38 B	Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Marl.)	✓	CV10 9TD	NBBC	WK358453
39 A	Land south-east of Hickman Road, Galley Common, Nuneaton (aka Chaucer Drive)	✓	CV10 9SD	NBBC	WK339730
40 A	Nuneaton & North Works Group Riding for Disabled, Valley Road, Galley Common (CV10 9NJ) / land at Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NJ) (aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre)	x	CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
41 B/A	Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the north east side of Merlin Avenue, south east side of Freeland Rise, Whittleford and land lying to the West of Bucks Hill (aka Freeland Rise)	✓	CV10 9QF	NBBC	WK319146/ WK326554
42 B/A	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Farnham Drive/Poplar Tree Farm EA)	✓	-	NBBC	WK319145
43 A	Land on Galley Common, Nuneaton; land at Galley Common Nuneaton and Land on the south side of Plough Hill Road, Stockingford (aka North Field)	✓	CV10 9PZ	NBBC	WK238447/ WK238145/ WK324522
44 B	Land on the south side of Sherbourne Avenue, Nuneaton	x	CV10 9JH	NBBC	WK234444
45 D	Land on the south side of Cardigan Road, Bedworth (aka Anderton Road POS)	✓	CV12 0HD	NBBC	WK281821
46 E	Land and Buildings at Market End Farm and Orchard Farm, Smorrell Lane	✓	CV12 0GE	Private	WK360708
47 E	Newdigate Recreational Ground - Land at Smorrell Lane, Bedworth	✓	CV12 0JP	NBBC	WK449987
48 A	Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thornione Way)	✓	CV10 8NN	NBBC	WK32497
49 A	Kingswood Road Recreational Ground - Land on the North side of Ansley Road, Stockingford	x	CV10 9QG	NBBC	WK32497
50 B	Stockingford Recreational Ground - Land on the west side of Westbury Road, Nuneaton and land on the north east side of Grove Road, Nuneaton and land lying to the west of Nuneaton Road	✓	CV10 8JX	NBBC	WK448137/ WK448304/ WK317827
51 E	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8NW	NBBC	WK449032
52 E	Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way)	x	CV8 5TE	Private	WK394575
53 E	Land on the North side of Bulkington Road and land on the South side of Johnson Road/Alex Wilson Centre, 34 Nuneaton Road, Bedworth (CV12 8AL) and land lying to the west of Wootton Street and land at Elizabeth Centre, Johnson Road	✓	CV12 9BH	NBBC	WK169700/ WK448169/ WK250992/ WK448429
54 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBC	WK449032
55 E	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8NN	NBBC	WK449032
56 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8JT	NBBC	WK449032
57 E	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	x	CV12 8JG	NBBC	WK366034
58 E	Land at Arbury Avenue, Bedworth (aka Arbury Road POS)	x		NBBC	WK448598
59 E	Collycroft Recreational Ground - Land lying to the east of Amos Jacques Road, Collycroft, Bedworth and land to the west of Nuneaton Road/Alex Wilson Centre 34 Nuneaton Road Bedworth and land to the west of Nuneaton Road	✓		NBBC	WK295888/ WK460024/ WK448169/ WK317827
60 E	Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road)	x	CV12 0AL	NBBC	WK449846
61 C	Land lying to the north of Butternere Avenue, Nuneaton	✓	CV11 8EP	NBBC	WK210888

62	C	Land at Horselton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	x		NBBC	WK336798/ WK344807
63	C	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	x	CV11 6YB	NBBC	WK447654/ WK319282
64	C	Recreation Ground, The Long Shoot, Nuneaton, (CV11 6JH)	x	CV11 8JH	NBBC	WK446888
65	C	Land at Horselton Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Drive/Tavistock Way)	✓	CV11 6YL	NBBC	WK336798/ WK447654
66	C	Land on the east side of Changebrook Close and land on the west and east side of Pallott Drive, Nuneaton	✓	-	NBBC	WK345480/ WK309853
67	B	Land on the south side of Church Lane, Nuneaton (Cleaver Gardens/Sandon Fields)	✓	CV10 0HG	NBBC	WK448958
68	B	Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue, Nuneaton (aka Coronation Walk)	✓	CV10 0BN	NBBC	WK448096/ WK448091
69	B	Land at Bradestone Road, Nuneaton	x		NBBC	WK450498
70	B	Land on the north side of Donnithorne Avenue, Nuneaton (aka Caldwell Grange)	x		NBBC	WK452385
71	B	Land on the south side of Avenue Road, Nuneaton (aka Gale Fields)	✓		NBBC	WK452278
72	B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground)	✓		NBBC	WK448985
73	B	Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	x		NBBC	WK449842/ WK449818
74	B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton	x	CV11 5PQ	NBBC	WK447476
75	B	Land at Donnithorne Avenue, Nuneaton; land lying to the east of Raveloe Drive, Nuneaton; land on the east side of Marston Lane, Nuneaton and Land on the east and west sides of Marston Lane, Nuneaton (aka Marston Lane Fields)	✓	CV11 4RE	NBBC	WK452370/ WK452349/ WK449468/ WK449734
76	B	Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chivers Coton	✓	CV10 7BX	NBBC	WK448537/ WK344972
77	B	Riversley Park, Coton Road, Nuneaton	✓	CV11 6TY	NBBC	WK450206/ WK450173
78	B	Land at Sorrell Road, Nuneaton	✓	CV10 7AW	NBBC	WK450035
79	B	Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton	x	CV11 5TX	NBBC	WK450206/ WK450173
80	B	Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park)	✓	CV11 4LX	NBBC	WK448985
81	C	Crowhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 6XA	NBBC	WK370815
82	B	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	x	CV11 4PW	NBBC	WK310067
83	E	Land at Acacia Crescent, Bedworth	x		NBBC	WK448428
84	B	Land at Dunns Close, Nuneaton	x		NBBC	WK452330
85	E	Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry)	x		Private	WK394575
86	C	Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton	x		WCC	WK271645/ WK455358
87	E	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC	WK470015/ WK424958
88	D/E	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV7 9AH)	✓	CV7 9AH	Private	WK463626
89	E	Race Leys Infant School, Bedworth	x	CV12 8AD	WCC	Unregistered
90	E	Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)	✓	CV12 0HP	WCC	WK424335
91	E	All Saints Bedworth C of E Primary School and Nursery, Bedworth	x	CV12 8HP	WCC	Unregistered
92	F	Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth	x	CV12 9RT	WCC	WK79471
93	E	The Cannons C of E Primary School - aka Land and buildings on the South side of Derwent Road, Bedworth	✓	CV12 8RT	Private	WK225063
94	E	Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth	x	CV7 9FJ	WCC	WK33092
95	D	Keresley Newland Primary Academy and Keresley Newland School, , Grove Lane, Keresley, Coventry, (CV7 6JZ)	✓	CV7 6JZ	WCC	WK427632/ WK477207
96	D	Newdigate Primary School and Nursery - aka Land lying to the South of Smormal Lane, Goodyears End, Bedworth and Land lying to the South of smormal Lane Bedworth	✓	CV12 0HA	WCC	WK27604/ WK134659
97	D/E	Wheelwright Lane Primary School, Ash Green, Coventry	✓	CV7 9HN	WCC	WK425267
98	E	St Francis Roman Catholic School, Nicholas Street, Bedworth	x	CV12 8JN	Private	WK262596
99	"	Land lying to the North of Rye Piece Ringway, Bedworth			Private	WK476476

		Land on the East Side of Nicholas Street, Bedworth			WCC	WK171388
99 E		St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV7 9NS	WCC	WK171647
100 F		St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF)	✓	CV12 9PF	Private	WK461720
		Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth, CV12 9PF			Private	WK472707
101 E		St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9DA)	✓	CV12 9DA	Private	WK479304
102 B		Land adjoining St Thomas More Catholic School and Sixth Form College, Greenmoor Road, Nuneaton, CV10 7EX	✓	CV10 7EX	Private	WK478035
		St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX			Private	WK477630
		Arbury High School, Greenmoor Road, Nuneaton			Private	WK233418
103 B		Abbey Col E Infant School, Nuneaton	x	CV11 5EL	WCC	Unregistered
104 B		All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)	x	CV10 7AT	Private	WK461748
105 B		Camp Hill Primary School, aka Land to the South of Tuttle Hill, Camp Hill, Nuneaton	✓	CV10 9QA	WCC	WK409218
106 C		Chatwynd Junior School, aka Land lying to the South of Gipsy Lane, Nuneaton	✓	CV11 4SE	WCC	WK170501
107 B		Land at Judkins Quarry Tuttle Hill, Nuneaton (aka Recycling Centre)	✓	CV10 0HU	WCC	WK393091
108 B		Chilvers Coton Community Infant School, Frank Street, Nuneaton (CV11 5RB)	x	CV11 5RB	WCC	WK424955
109 B		Croft Junior School, aka Land lying to the west of Northumberland Avenue, Nuneaton	✓	CV10 8ER	WCC	WK239413
110 B		Gailey Common Infant School, Nuneaton	x	CV10 8NZ	WCC	Unregistered
111 C		Milby Primary School, aka Land lying to the East of Higham Lane, Nuneaton	✓	CV11 6JS	WCC	WK205172
112 B		Glendale Infant School, aka Land on the south side of Skye Close, Nuneaton	x	CV10 7LW	WCC	WK178493
113 B		Middlemarch School, Nuneaton	✓	CV10 7BQ	WCC	Unregistered
114 B		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	x	CV10 8HW	WCC	WK426673
		Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
115 B		Our Lady of the Angels Infant School and St Josephs RC First School at Coton Road, Nuneaton	x	CV11 5TY	Private	WK226511
		Our Lady of the Angels Infant School and St Josephs RC First School, Coton Road, Nuneaton, CV11 5TY			Private	WK477543
116 A		Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton	✓	CV10 8NL	Private	WK470637
		Land on the North Side of Ansley Road, Nuneaton			Private	WK189735
117 B		Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR			Private	WK471379
118 B		St Pauls C of E Primary School, Nuneaton	x	CV10 8NH		Unregistered
119 B		Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	x	CV10 0JX	Private	WK480568
		St. Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX			Private	WK449953
120 B		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	x	CV11 4QH	Private	WK468047
		Oakwood Secondary School, Morris Drive, Nuneaton			Private	WK468048
		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH			WCC	WK233776
121 C		Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 6HJ	x	CV11 6HJ	WCC	WK473130
		Land on the East Side of Windemere Avenue, Nuneaton			Private	WK131856
		St Nicolas C of E First School, Windemere Avenue, Nuneaton, CV11 6HJ			Private	WK473119
122 B		Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton	✓	CV10 0DR	WCC	WK149023/WK216447
123 B		Land at George Elliot School, Raveloe Drive, Nuneaton, CV11 4QP	✓	CV11 4QP	Private	WK458956
124 B		Wambrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton	✓	CV11 4LU	NBBC	WK448965
125 B		Etons College, Leicester Road, Nuneaton, CV11 6AA	✓	CV11 6AA	WCC	WK425515
126 B		Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	✓	CV10 0BJ	Private	WK465311
127 B		Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓	CV11 4QH	WCC	WK468047/WK468048/WK233776
128 B		The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Rad	✓	CV10 7PD	WCC	WK175243/WK425489
129 C		North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓	CV11 6BH	Private	WK428595

130	B	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓	CV11 4BE	Private	WK497842/WK497832
131	E	Bedworth Heath Nursery School, Globe Avenue, Bedworth, CV12 0DP	x	CV12 0DP	WCC	WK426282
132	D	Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
"		Exhall Grange Special School, Wheelwright Lane, Coventry			Private	WK440475
"		Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 8HP	✓	CV7 8HP	Private	WK450903
133	E	Quest Academy, North Side of Griff Lane, Nuneaton	✓	CV10 7SD	WCC	WK365844
134	E	Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton	x	CV12 8AG	WCC	WK240628
"		Race Leys Middle School, Barton Road, Bedworth, CV12 8HG		CV12 8HG	Private	WK465841
135	B	Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
"		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 8JY	WCC	WK42667
136	C	Whitstone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton	x	CV11 4SQ	WCC	WK23140
137	B	Attleborough Mills, Attleborough Road, Nuneaton (aka Holman Way)	x		Private	WK256088
138	B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton	x	CV11 6SS	Private	WK430022
139	B	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓	CV10 7SD	Private	WK447390
140	B	Halfords - land and buildings on the south side of Newtown Road, Nuneaton	x	CV11 5UT	Private	WK390614
141	B	Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre)	✓	CV10 7HU	Private	WK474729

Key for traveller encampment maps



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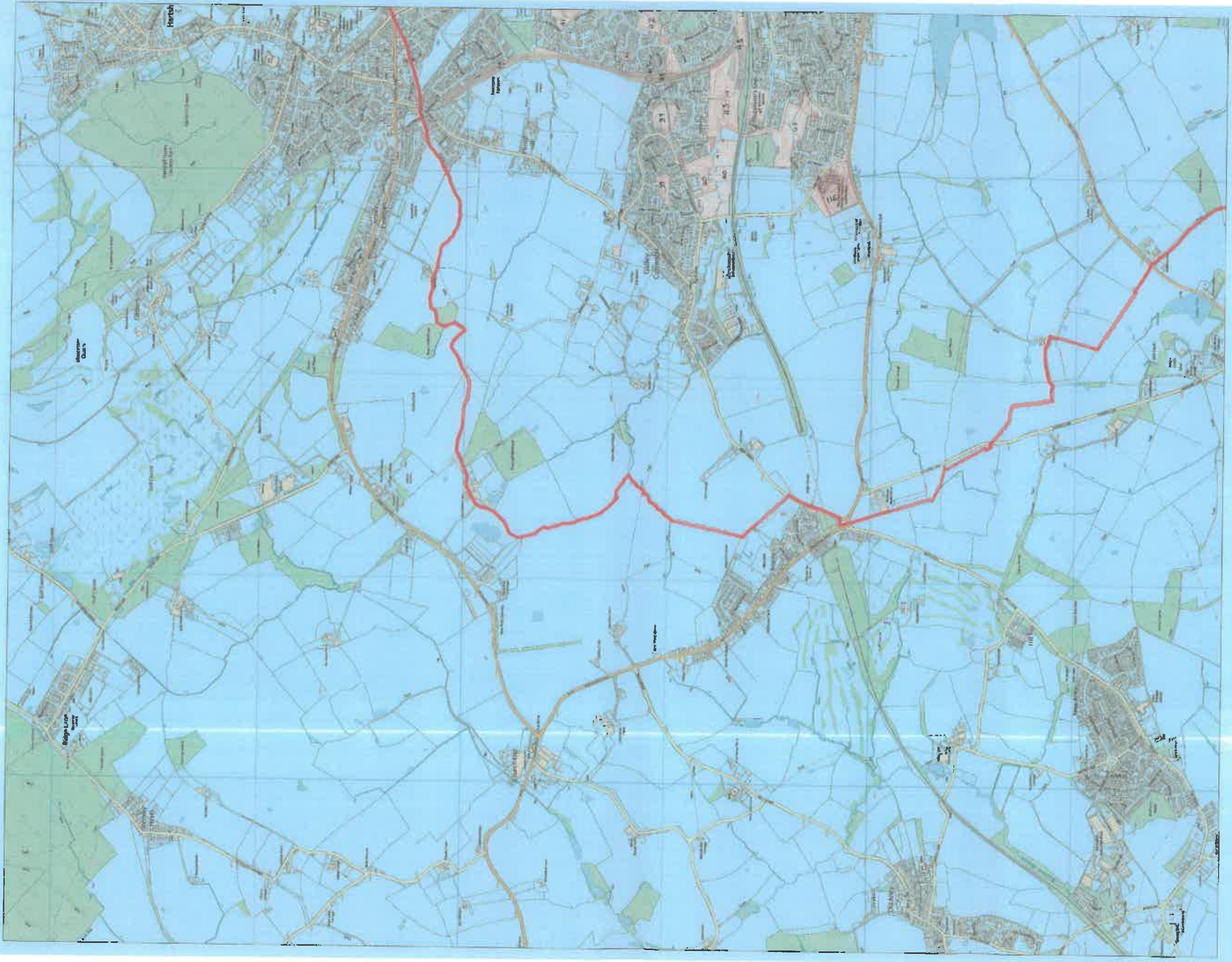


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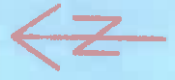
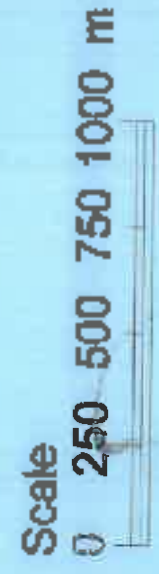


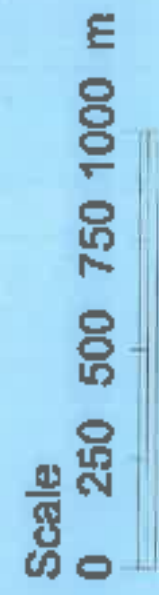
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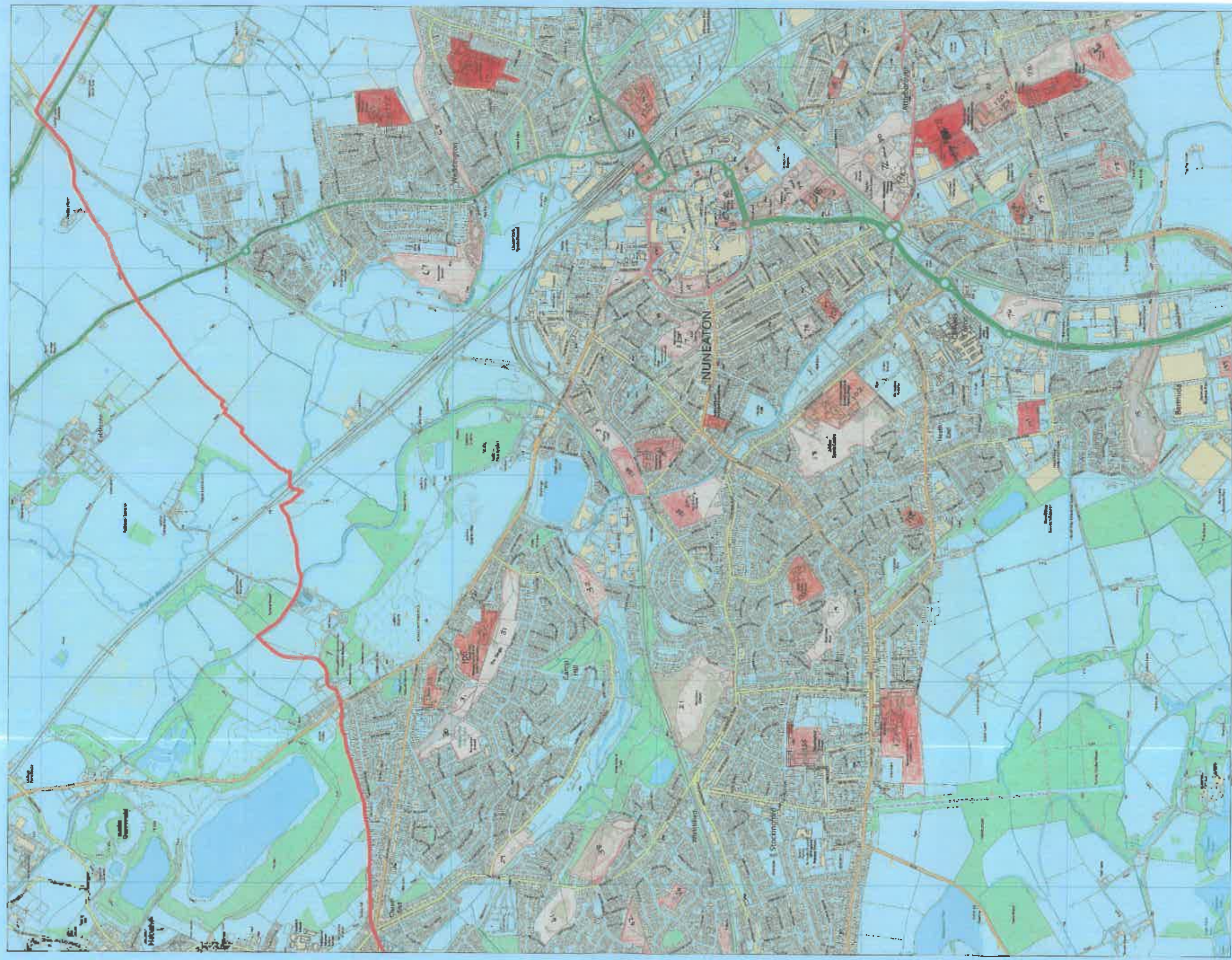
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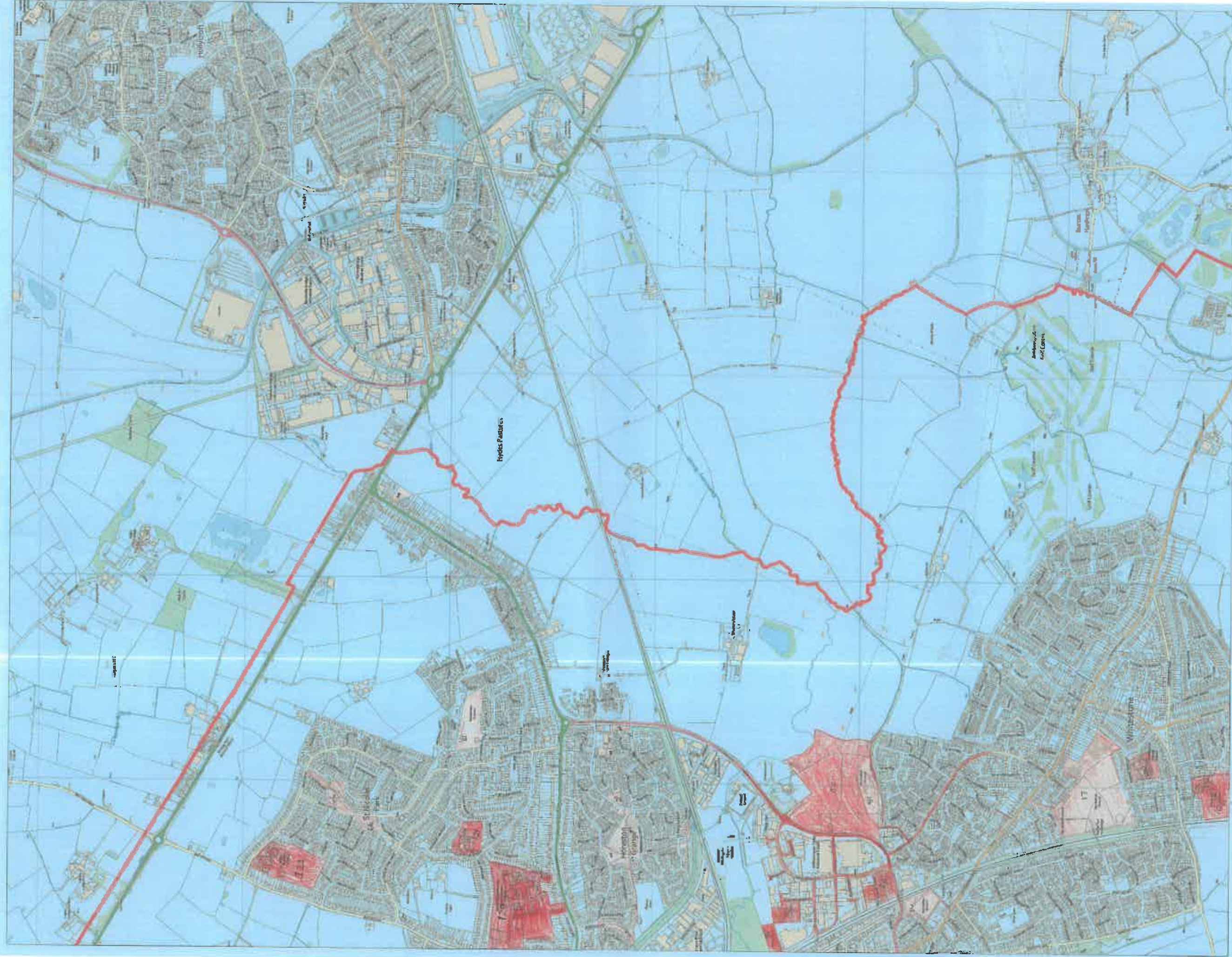


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North of Nuneaton



Northeast Nuneaton



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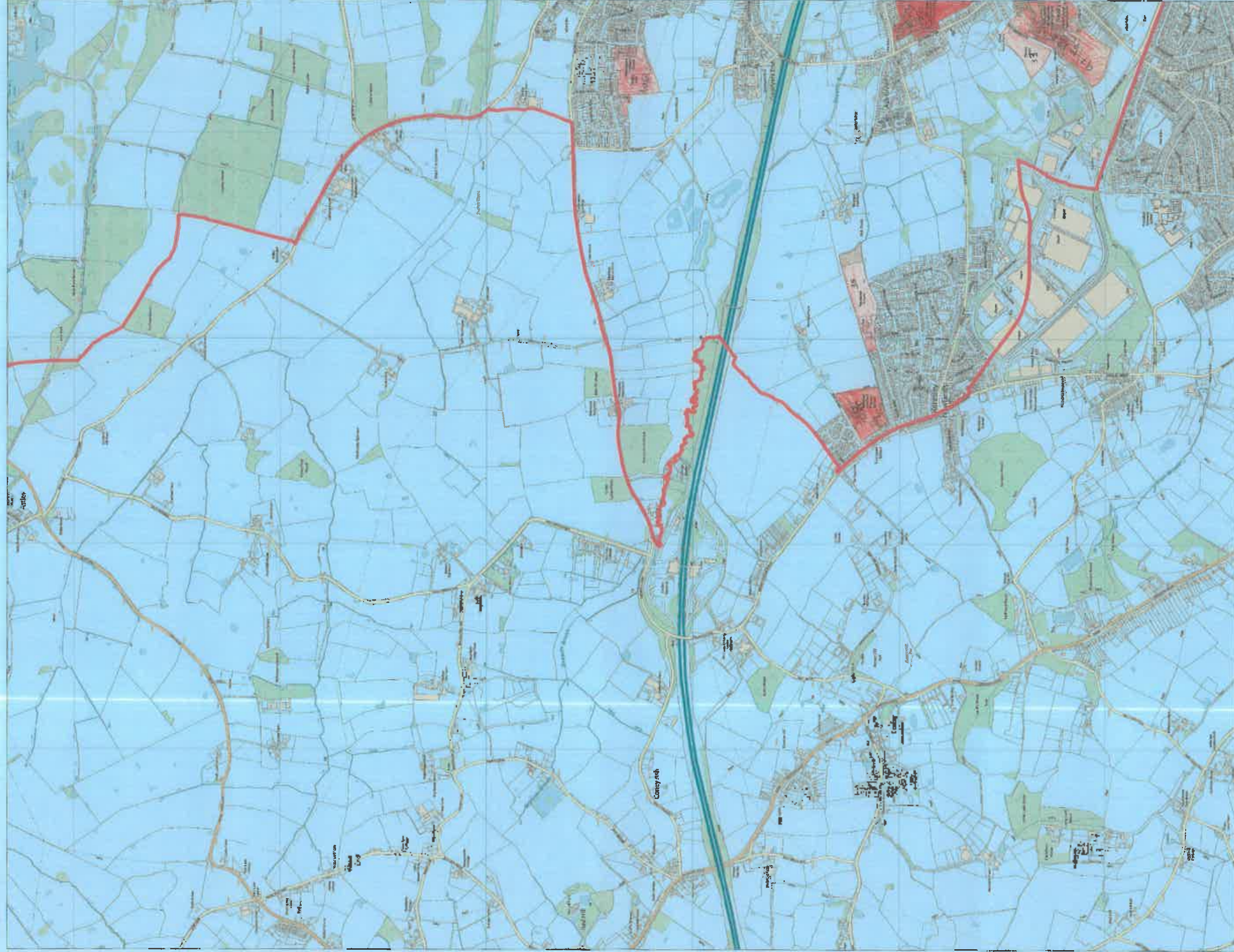
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Southwest Bedworth



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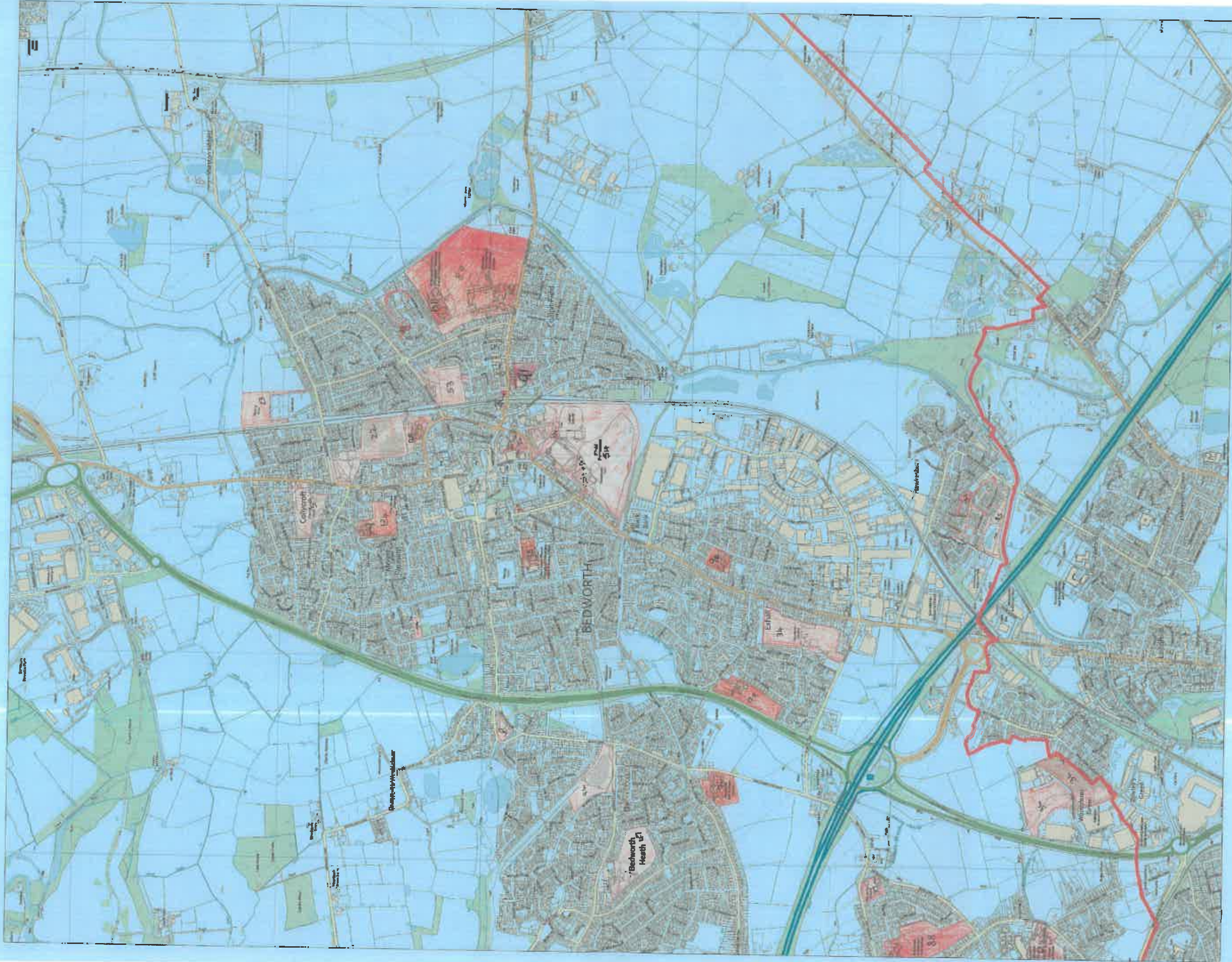


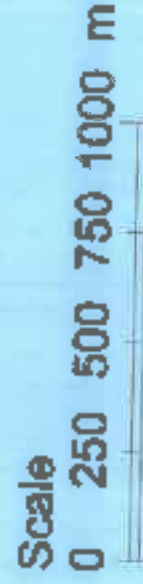
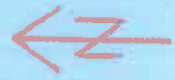
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South of Bedworth

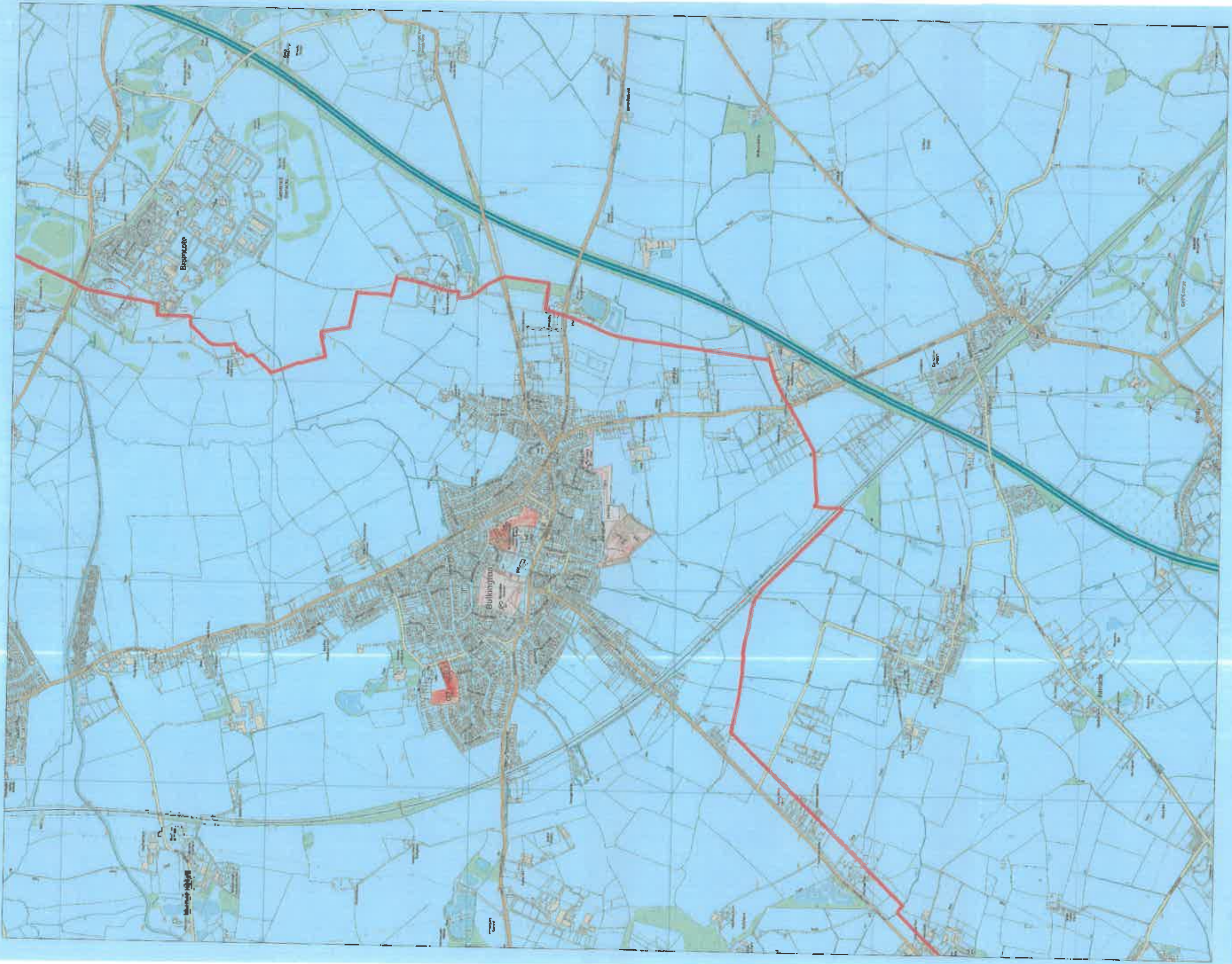




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Southeast Bedworth



IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE NICKLIN

B E T W E E N:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2) –(53) NAMED DEFENDANTS
(54) PERSONS UNKNOWN

Defendants

-and-

(1) LONDON GYPSIES AND TRAVELLERS
(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIASON GROUPS

Interveners

EXHIBIT 'PR 2'

IN THE HIGH COURT OF JUSTICE

Claim Number: QB 2019 009616

QUEEN'S BENCH DIVISION

IN THE MATTER OF S22 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990

Before Timothy Straker QC (sitting as a Deputy Judge of the High Court)

On the 19th day of March 2019

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & 53 OTHER NAMED DEFENDANTS IN SCHEDULE 1
OF THE CLAIM FORM(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

ORDER

IF YOU, ANY OF THE ABOVE NAMED FIRST TO FIFTY-THIRD DEFENDANTS OR PERSONS UNKNOWN DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

UPON HEARING COUNSEL MISS CAROLINE BOLTON FOR THE CLAIMANTS AND THE DEFENDANTS NOT ATTENDING

AND UPON READING THE PAPERS AND HEARING THE APPLICATION FOR AN INTERIM INJUNCTION PENDING THE FINAL INJUNCTION HEARING PURSUANT TO SECTION 222 LOCAL GOVERNMENT ACT 1972 AND 187B TOWN AND COUNTRY PLANNING ACT 1990

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST FOR BREACH OF PARAGRAPHS 1-9 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006 AND SECTION 1 OF THE ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014. ANY PERSON CAUGHT BREACHING PARAGRAPHS 1-10 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT.

Note to Arresting Officer: Where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or the Anti-social Behaviour Crime and Policing Act 2014 :-

- The defendant shall be brought before the judge within a period of 24 hours beginning at the time of their arrest
- A constable shall inform the person on whose application the injunction was granted forthwith where the defendant is arrested under these powers

Nothing in sections 27 of the Police and Justice Act 2006 or the Anti-social Behaviour Crime and Policing Act 2014 shall authorise the detention of the defendant after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculation any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

IT IS ORDERED THAT:

1. The proceedings shall be stayed against the 14th Defendant Terry Maughan, 28th Defendant Simon McDonough, 36th Defendant Martin Ward and 37th Defendant Pae Ward with liberty to restore.

Until further order, The First to Fifty-Third Defendants (save for the 14th, 28th, 36th and 37th Defendants) are forbidden from

1. Setting up or encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the Secretary of State.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia save for Thomas Corcoran (the First Defendant) and his wife Jessica Dadds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
5. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks in which the relevant residential mobile homes are sited.

- 16. A Defendant who is an individual who is ordered not to do something must not do it or allow any others to do it, must not let it happen, must not encourage others to do it or be involved in causing it to happen.
- 17. A Defendant who is a corporation and which is ordered not to do something must not do it, its officers, directors, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

- 19. It is a contempt of court for any person notified of this Order knowingly to not do or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

INTERPRETATION OF THIS ORDER

- 20. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
- 21. A requirement to serve on "the Defendants" means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.
- 22. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
- 23. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990.

COMMUNICATIONS WITH THE COURT

- 24. All communication to the Court about this order should be sent to Room WC08 Royal Courts of Justice, Strand, London, WC2A 9LE (020 7947 6010).

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE NICKLIN

B E T W E E N:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2) –(53) NAMED DEFENDANTS
(54) PERSONS UNKNOWN

Defendants

-and-

(1) LONDON GYPSIES AND TRAVELLERS
(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIASON GROUPS

Interveners

EXHIBIT 'PR 3'

Andrea Stubbs

From: Wendy Davies-White <wendy.davies-white@nuneatonandbedworth.gov.uk>
Sent: 25 April 2019 14:37
To: Philip Richardson; Waheeda Sheikh
Subject: NBBC Traveller Injunction

I have spoken with William (who has also checked with Caroline) to confirm the next stages –

Their view is that we now monitor the situation throughout the summer and update them both in September with a view to applying for the final order November / December.

If we've had no breaches or only minor breaches it should be a pretty straight forward application. If we have serious breaches we should alert Caroline and William sooner and make sure that we gather good evidence to put back before the Court.

Wendy

W.S Davies – White
 Solicitor
 Nuneaton and Bedworth Borough Council
 Town Hall
 Nuneaton
 CV11 5AA
wendy.davies-white@nuneatonandbedworth.gov.uk
 Tel: 024 76 376 100

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IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN AND
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(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIASON GROUPS

Interveners

EXHIBIT 'PR 4'

Andrea Stubbs

From: Dawn Dawson <dawn.dawson@nuneatonandbedworth.gov.uk>
Sent: 21 January 2020 15:30
To: Philip Richardson
Cc: Simone Hines
Subject: Final Injunction

Hi Phil,

Rob has mentioned that we are looking to go for the final traveller Injunction in March this year.

Do you know if the cost is being covered and where from? Also, can you give me any indication of what resources you'll need from Rob Watson's team? I need to know as Rob will be leaving at the beginning of April and he has a project to complete before he goes.

Thanks

Dawn

Best Regards

Dawn Dawson
 Director - Housing, Communities & Economic Development
 Phone: 024 7637 6408
 Email: dawn.dawson@nuneatonandbedworth.gov.uk
 Nuneaton and Bedworth Borough Council
 Town Hall
 Coton Road
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Twitter: [@NBBIinvest](#)

NBBinvest

Andrea Stubbs

From: Philip Richardson <philip.richardson@nuneatonandbedworth.gov.uk>
Sent: 22 January 2020 12:35
To: Dawn Dawson
Cc: Simone Hines
Subject: RE: Final Injunction

Hi Dawn,

Possibly!

We are awaiting the decision of the Court of Appeal on Bromley LBC's appeal against a refusal to grant a similar injunction. That may determine whether we proceed to a final application or not (at this stage). The hearing was before Christmas, but the decision was reserved and hasn't yet been published.

I did meet with William Rose in December and he mentioned that Caroline was keen to get an application in. We agreed, however, that it would be sensible to wait the CA's decision.

In terms of costs, we would have a similar costs to last time, especially in terms of service. That means an application to issue and seek substituted service; use of process servers to serve the papers and then service of the proceedings followed by (if successful) service of the final order. All very messy, complicated and expensive. However, the longer we leave it, the harder it will become to justify the final order.

Regards,

Philip Richardson
Director – Arts, Leisure & Democracy

Town Hall
Nuneaton
CV11 5AA

Tel: 024 76376233
E-mail: Philip.Richardson@nuneatonandbedworth.gov.uk



From: DAWSON Dawn
Sent: 21 January 2020 15:30
To: RICHARDSON Philip
Cc: HINES Simone
Subject: Final Injunction

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 Dawn
 Best Regards

Dawn Dawson
 Director - Housing, Communities & Economic Development
 Phone: 024 7637 6408
 Email: dawn.dawson@nuneatonandbedworth.gov.uk
 Nuneaton and Bedworth Borough Council
 Town Hall
 Coton Road
 Nuneaton

Andrea Stubbs

From: WATSON Rob <Rob.Watson@nuneatonandbedworth.gov.uk>
Sent: 05 March 2020 14:24
To: Philip Richardson; Dawn Dawson; Brent Davis; Simone Hines; Craig Pugh; MORETON Katherine
Cc: Waheeda Sheikh
Subject: RE: Nuneaton and Bedworth B.C. - Travellers (170.19)

Hi Phil

Yes Carol will produce an updated statement once we have confirmed with the Police. I understand we've had five encampments on protected sites since April 2019, all gone in 24hrs or less but will document in statement.

WCC are currently seeking an injunction I understand covering the land at Burlington Way and the Cawley family who they sought to deal via injunction – Paul Gibbs at WCC might be worth contacting about this.

Temp stopping policy – we have the joint working procedure for the Hartshill site which could easily be amended to suit – I'll dig it out and send to you/Waheeda. I'm happy to work on it if required – what are the timescales?

Regards

Rob Watson
 Private Sector Housing Manager

Phone: 024 7637 6554
 Email: rob.watson@nuneatonandbedworth.gov.uk

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Nuneaton and Bedworth and North Warwickshire Shared Private Sector Housing Service



HEART, Helping you Live Independently at Home

From: RICHARDSON Philip

Sent: 04 March 2020 09:46

To: DAWSON Dawn <dawn.dawson@nuneatonandbedworth.gov.uk>; WATSON Rob <Rob.Watson@nuneatonandbedworth.gov.uk>; DAVIS Brent <brent.davis@nuneatonandbedworth.gov.uk>; HINES Simone <simone.hines@nuneatonandbedworth.gov.uk>; PUGH Craig <craig.pugh@nuneatonandbedworth.gov.uk>; MORETON Katherine <katherine.moreton@nuneatonandbedworth.gov.uk>

Cc: SHEIKH Waheeda <waheeda.sheikh@nuneatonandbedworth.gov.uk>

Subject: FW: Nuneaton and Bedworth B.C. - Travellers (170.19)

Hi all,

Caroline's response to the letter from the NFGLG.

Do we have a policy on temporary stopping places? Can we adopt WCC's for the sake of expediency?

Rob, can Carol look at preparing an update statement as to what has happened since the making of the Order? I am aware of some incursions, but that the police dealt with them under the order and secured the removal of unauthorised encampments within 24 hours. WCC have had problems. Waheeda, can we liaise with County Legal services to get their perspective (and whether they wish to add sites to the order).

The last piece in this is the Local Plan provision. We need to ensure that we can demonstrate a positive direction of travel vis a vis meeting our need, plus the 5 transit pitches currently allowed for in the Local Plan. Katherine is on the case, but we may want to beef this up as an issue with the Local Plan Committee before our application (if we determine to make it) is heard.

Regards,

Philip Richardson

Director – Arts, Leisure & Democracy

Tel: 024 76376233

Fax: 0870 608 9457

e-mail: Philip.Richardson@nuneatonandbedworth.gov.uk

Nuneaton and Bedworth Borough Council

Town Hall

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Nuneaton

CV11 5AA



From: Caroline Bolton <CBolton@radcliffechambers.com>

Sent: 04 March 2020 09:33

To: William Rose <WRose@sharpepritchard.co.uk>

Cc: RICHARDSON Philip <philip.richardson@nuneatonandbedworth.gov.uk>; SHEIKH Waheeda <waheeda.sheikh@nuneatonandbedworth.gov.uk>

Subject: Re: Nuneaton and Bedworth B.C. - Travellers (170.19)

Dear William

As you know I was involved in the Bromley case for the Fourth Intervenor. The following needs to be appreciated:

1. Marc Willers QC for the London Gypsies and Travellers made it clear to the Court of Appeal at the beginning of the hearing that they were not taking issue with the approach taken by the Fourth Intervener to these injunctions. In particular the Fourth Intervener's approach was naming those that a borough-wide order was sought against and justifying each identified site as being either a targeted site or a site of similar nature to those targeted. Further, the Fourth Intervener had a robust EQIA's in place, and the injunction was targeted at behaviour not simply entry on to land. All of my clients injunctions follow this approach, so the Nuneaton injunction does not need to be set-aside or varied and will be fine. This can be covered in a letter to Dr Spencer. It should be noted that this type of letter has been sent to all Councils with an injunction.
2. The Court of Appeal made clear that in the Harlow type cases an injunction was justified. This was because these injunctions targeted behaviour not simply the fact that travellers were stopping up. I have ensured all my clients injunctions follow the approach we took in Harlow.
3. We have been making some changes to the injunctions since the First Bromley hearing, just as a precaution, which given the Court of Appeal's comments in the Bromley case, I suggest Nuneaton should also adopt (this does not require a variation simply a tweak to the draft order at the final hearing and some additional evidence): (i) We have been updating the EQIA between the interim and final hearing and ensuring the EQIA is as robust as possible for the final hearing; (ii) We have been introducing a negotiated stopping policy/tolerance policy to show how we will deal with genuine travellers. This can be a policy that simply allows for stopping on the existing site the travellers pull up on (subject to entering an agreement to abide by certain conditions and behaviour and to limit numbers), or a site that you ask the travellers to move to (with the same agreement in place). This is important as the courts were concerned about the lack of transit sites. This gives a complete answer to that concern, but the policy is at the discretion of the Council who will operate it where the travellers are not causing issues and only where the site is appropriate for stopping or another appropriate site can be identified. I would caution against proceeding to final hearing without this. The Court of Appeal has made it clear that it wants some provision in place to ensure we are facilitating the travellers way of life. The current lack of a negotiated stopping policy does not cause the interim order any issues, but it may cause a final order issues if it's not in place, given the new guidance and the fact that the Court has a broad discretion and is a matter for the judge at the final hearing. I am happy to assist with this policy if required.
4. We will also need an updated statement explaining what has happened since the injunction was granted. We will also need up-to-date details on our general need figures for permanent sites and how we are doing with meeting that need. If I can have these details I will review ASAP. I would also want a clear table explaining justification for each site covered by the order against Persons Unknown. As explained above this can be justified on the basis that it has been targeted or is vulnerable to being targeted, but the basis for inclusion should be clear.
5. Finally, we will need to make an exception in the injunction order for where the travellers have permitted development rights. This does not harm the injunction as permitted development rights can only be exercised with the consent of the landowner, so in reality it makes no difference to the injunction. Further, it only applies in relation to travellers encampments in very limited circumstances on certain land types (it would not have applied to any of the encampments that Nuneaton have experienced to date).

Please let me know if you wish me to prepare the letter to Dr Spencer, ideally it would be better to write to her once we have a tolerance/negotiated stopping policy in place (even if it's only informal at present-it will need to be in writing before the final hearing, as the court will be considering matters afresh, but for now an informal approach will be fine).

Best wishes

Caroline

Caroline Bolton, Barrister

cbolton@radcliffechambers.com | www.radcliffechambers.com |

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11 New Square
Lincoln's Inn
London
WC2A 3QB

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DDI: 020 7692 2052
DX: 319 London

From: William Rose <WRose@sharpepritchard.co.uk>
Date: Wednesday, 26 February 2020 at 15:24
To: Caroline Bolton <cbolton@radcliffechambers.com>
Cc: RICHARDSON Philip <philip.richardson@nuneatonandbedworth.gov.uk>, SHEIKH Waheeda <waheeda.sheikh@nuneatonandbedworth.gov.uk>
Subject: Nuneaton and Bedworth B.C. - Travellers (170.19)

Dear Caroline

I forward an e-mail received from Philip of today's date which in turn attaches a letter dated 17th February 2020 from Dr Siobhan Spencer who apparently writes on behalf of the National Federation of Gypsy Liaison Groups.

I should be grateful if you would provide the following:-

1. Confirmation that the Injunction Order granted by Timothy Straker QC dated 19th March 2019 is still in good order and that the Council should resist any suggestion that it should be set aside/withdrawn/discharged.
2. A letter in reply to the letter from Dr Siobhan Spencer.
3. Confirmation that the appropriate course of action now is for the Council to seek a final injunction. If this is the case, is it simply a case of issuing an Application Notice for a final Order returnable in say May?

If you have any queries please do not hesitate to contact me.

Kind regards

William Rose | Partner and Privy Council Agent
For Sharpe Pritchard LLP
T: +44(0)20 7405 4600
E: WRose@sharpepritchard.co.uk
www.sharpepritchard.co.uk

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Andrea Stubbs

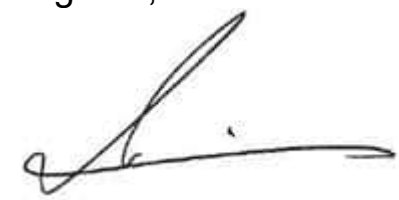
From: Philip Richardson <philip.richardson@nuneatonandbedworth.gov.uk>
Sent: 05 March 2020 16:56
To: WATSON Rob; Dawn Dawson; Brent Davis; Simone Hines; Craig Pugh; MORETON Katherine
Cc: Waheeda Sheikh
Subject: RE: Nuneaton and Bedworth B.C. - Travellers (170.19)

Thanks Rob. Timescales are asap, as Caroline would like this in place so that it can be referred to in the reply.

We raised the issue at Informal cabinet yesterday and have the green light to work up a report for submission to Cabinet seeking authority to proceed with the application (this will be on pink). We indicated that we are looking for an order in the next 3 to 6 months. We obviously need to get our ducks in a row, especially the bits raised by Caroline. It might make sense for the report to Cabinet to include approval of the policy at the same time (for completeness). Craig is looking at the funding issue (I said we spent about £100K last time and we should assume the same again given the costs of service and fees).

On the WCC front, it might be easier for them to simply seek changes to our order! If you recall, in the Harlow case, the sites were amended with some added to address other concerns. I assume that WCC would prefer a final order for say 3 to 5 years, rather than an interim? Can you raise with Paul Gibbs? This would strengthen the "we have alternative provision if required" point raised by Caroline.

Regards,



Philip Richardson
Director – Arts, Leisure & Democracy

Tel: 024 76376233
Fax: 0870 608 9457
e-mail: Philip.Richardson@nuneatonandbedworth.gov.uk

Nuneaton and Bedworth Borough Council
Town Hall
Coton Road

Nuneaton
CV11 5AA



From: WATSON Rob <Rob.Watson@nuneatonandbedworth.gov.uk>

Sent: 05 March 2020 14:24

To: RICHARDSON Philip <philip.richardson@nuneatonandbedworth.gov.uk>; DAWSON Dawn <dawn.dawson@nuneatonandbedworth.gov.uk>; DAVIS Brent <brent.davis@nuneatonandbedworth.gov.uk>; HINES Simone <simone.hines@nuneatonandbedworth.gov.uk>; PUGH Craig <craig.pugh@nuneatonandbedworth.gov.uk>; MORETON Katherine <katherine.moreton@nuneatonandbedworth.gov.uk>

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Private Sector Housing Manager

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Email: rob.watson@nuneatonandbedworth.gov.uk

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North Warwickshire
Borough Council

Nuneaton and Bedworth and North Warwickshire Shared Private Sector Housing Service



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Sent: 04 March 2020 09:46

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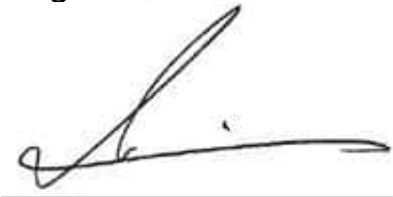
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Director – Arts, Leisure & Democracy

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Fax: 0870 608 9457
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Sent: 04 March 2020 09:33
To: William Rose <WRose@sharpepritchard.co.uk>
Cc: RICHARDSON Philip <philip.richardson@nuneatonandbedworth.gov.uk>; SHEIKH Waheeda <waheeda.sheikh@nuneatonandbedworth.gov.uk>
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Best wishes

Caroline

Caroline Bolton, Barrister

cbolton@radcliffechambers.com | www.radcliffechambers.com |

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11 New Square
Lincoln's Inn
London
WC2A 3QB

Tel: 020 7831 0081
DDI: 020 7692 2052

DX: 319 London

From: William Rose <WRose@sharpepritchard.co.uk>

Date: Wednesday, 26 February 2020 at 15:24

To: Caroline Bolton <cbolton@radcliffechambers.com>

Cc: RICHARDSON Philip <philip.richardson@nuneatonandbedworth.gov.uk>, SHEIKH Waheeda <waheeda.sheikh@nuneatonandbedworth.gov.uk>

Subject: Nuneaton and Bedworth B.C. - Travellers (170.19)

Dear Caroline

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3. Confirmation that the appropriate course of action now is for the Council to seek a final injunction. If this is the case, is it simply a case of issuing an Application Notice for a final Order returnable in say May?

If you have any queries please do not hesitate to contact me.

Kind regards

William Rose | Partner and Privy Council Agent
 For Sharpe Pritchard LLP
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 E: WRose@sharpepritchard.co.uk
www.sharpepritchard.co.uk

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<http://www.claranet.co.uk>

Andrea Stubbs

From: WATSON Rob <Rob.Watson@nuneatonandbedworth.gov.uk>
Sent: 05 March 2020 17:06
To: Philip Richardson; Dawn Dawson; Brent Davis; Simone Hines; Craig Pugh; MORETON Katherine
Cc: Waheeda Sheikh; Paul Coopey
Subject: RE: Nuneaton and Bedworth B.C. - Travellers (170.19)

Yes I'll speak with WCC tomorrow to discuss joining and adding additional sites and named individuals option. Carol will complete statement by end of next week. I'll pull the info on the temp stop arrangement with view to completing by same timeframe then.

Regards

Rob Watson
 Private Sector Housing Manager

Phone: 024 7637 6554
 Email: rob.watson@nuneatonandbedworth.gov.uk

Nuneaton and Bedworth Borough Council
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Nuneaton and Bedworth and North Warwickshire Shared Private Sector Housing Service



HEART, Helping you Live Independently at Home

From: RICHARDSON Philip
Sent: 05 March 2020 16:57
To: WATSON Rob <Rob.Watson@nuneatonandbedworth.gov.uk>; DAWSON Dawn <dawn.dawson@nuneatonandbedworth.gov.uk>; DAVIS Brent <brent.davis@nuneatonandbedworth.gov.uk>; HINES Simone <simone.hines@nuneatonandbedworth.gov.uk>; PUGH Craig <craig.pugh@nuneatonandbedworth.gov.uk>; MORETON Katherine <katherine.moreton@nuneatonandbedworth.gov.uk>
Cc: SHEIKH Waheeda <waheeda.sheikh@nuneatonandbedworth.gov.uk>
Subject: RE: Nuneaton and Bedworth B.C. - Travellers (170.19)

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e-mail: Philip.Richardson@nuneatonandbedworth.gov.uk

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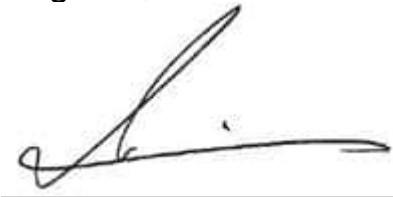
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Caroline

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DDI: 020 7692 2052

DX: 319 London

From: William Rose <WRose@sharpepritchard.co.uk>

Date: Wednesday, 26 February 2020 at 15:24

To: Caroline Bolton <cbolton@radcliffechambers.com>

Cc: RICHARDSON Philip <philip.richardson@nuneatonandbedworth.gov.uk>, SHEIKH Waheeda <waheeda.sheikh@nuneatonandbedworth.gov.uk>

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If you have any queries please do not hesitate to contact me.

Kind regards

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Andrea Stubbs

From: WATSON Rob <Rob.Watson@nuneatonandbedworth.gov.uk>
Sent: 10 March 2020 14:33
To: Philip Richardson; Waheeda Sheikh; Dawn Dawson
Cc: MORETON Katherine; Paul Coopey
Subject: RE: Nuneaton and Bedworth B.C. - Travellers (170.19)
Attachments: Emergency Stopping Places Management Procedure Ver 6 FINAL.DOCX; GandT UE flowchart FINAL.PDF; CAROL INGLESTON STATEMENT MARCH 2020.doc

Hi Phil/Dawn

WCC are currently seeking to progress two injunctions – one to protect Burlington Way/St George Ways and another on Cawley family. The site specific one is further along and at the point of being ready to be applied for – WCC may prefer to carry on now with this rather than wait 3-6 for our final application.

They perceived utilising our final injunction as major positive however. They will either proceed with their interim application and then join our final application at the time (if legally possible?) or just await our final which makes more sense to me. Paul Gibbs will confirm with Lara and Mick Goucher and let us know.

WCC's latest procedure for the ESP is attached but this is awaiting final review on 25th March. It will need amending if we are to use this but gives something to work from. I am assuming you or Waheeda will be completing this? In terms of negotiated stopping places we don't have anywhere to do this so the ESP is our only realistic option.

Carol's statement is attached.

Regards

Rob Watson
 Private Sector Housing Manager

Phone: 024 7637 6554
 Email: rob.watson@nuneatonandbedworth.gov.uk

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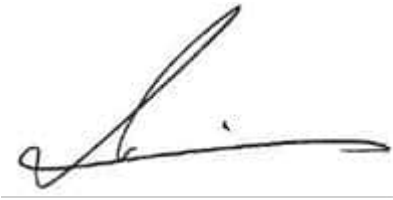
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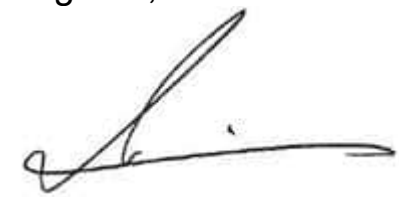
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Emergency Stopping Places Management Procedure

** To be used in conjunction with ESP Use Flowchart **

Oldbury Road Hartshill Nuneaton CV11 0TJ

1. INTRODUCTION

1.1 This procedure sets out the management arrangements for the site known as Emergency Stopping Place (ESP) at Oldbury Road, Hartshill.

1.2 The process of dealing with Unauthorised Encampments is outlined in the The Warwickshire Protocol. The Emergency Stopping Places are facilities to be used as part of the Section 62A Criminal Justice and Public Order Act 1994 when dealing with Unauthorised Encampments in the County of Warwickshire. Requests to consider the Section 62A power are directed to the Police. The police will make a formal request to the Warwickshire County Council (WCC) Gypsy and Traveller Team to open the site.

1.3 The maximum stay at this location is 28 days in any 3 month period. The 3-month period is calculated from the first day of occupation **regardless if the group splits**.

2. REQUEST TO OPEN SITE

2.1 The Police will request the opening of the site during office hours and a meeting will take place to discuss the time scale involved in making the site operational. The time-scale will consider the resources required to facilitate the procedure and the delivery times for the amenities. The site will not open on a Friday due to the resources needed to carry out the procedures.

2.2 The WCC Assistant Director for Communities or, in their absence the Head of Community Safety will be responsible for making the decision to open the site. The decision will be based on a risk assessment of the Travellers Group to be placed on the site, the risks that the local community present and the community tensions involved. (Template Risk Assessment can be found at **Appendix B**)

3. ESP KEYS

3.1 The keys to the site will be held by the Gypsy and Traveller Team based in Barrack Street Warwick. A spare set of keys will be available at the Harm Hub Warwickshire Justice Centre to facilitate access to the site for maintenance.

4. PRIOR TO OCCUPATION

4.1 Prior to occupation, WCC will arrange for suitable amenities to be provided to the site. (**Appendix E** contains up to date details of suppliers to contact). Where it is not practicable to provide the amenities prior to first occupation, provision will be made available at the first available opportunity. The estimated time for provision of amenities should be

communicated to the Traveller group; unless a substantial delay (+ 3 days) the weekly rent per caravan of £80 remains unchanged.

4.1.1 A request will be made to remove the security at the entrance to the site. Details of contractor are in **Appendix E**.

4.2 Before the site is occupied a general condition inspection is to be undertaken and where possible photographed/videoed by an officer. The inspection will include the condition of the fencing, the external area, pitch division, hard standing, barriers and water supply. The general area surrounding the site should be assessed to establish current cleanliness and condition. (Template form to complete inspection found at **Appendix F**)

4.3 At the time of serving the Section 62A (**Appendix A**) on the group by the police, the conditions of occupation will be set out and written documentation will be supplied explaining the procedure along with a verbal explanation to ensure understanding.

4.4 Support from the Local Authority in the District or Borough where the Unauthorised Encampment is in occupation will be requested by The Gypsy and Traveller Team in order to carry out the Section 62A process. The number of staff required will be dependent on the numbers involved in the encampment.

4.5 At a prearranged time and location at Nuneaton and Bedworth Town Hall (preferred location unless other local authority facility becomes available) WCC staff will:

4.5.1 Receive the deposit for each pitch – either an individual deposit from each pitch, or a single deposit for all pitches taken from one individual.

4.5.2 Receive a week's rent in advance of that pitch

4.5.3 Record details of photographic Identification of the person(s) handing over the monies

4.5.4 Explain and issue the pitch agreement and explaining the maximum time of stay (**Appendix C**)

4.5.5 Explain the return of deposit procedure and highlight clearly that leaving prior to a site inspection will forfeit the deposit.

4.5.6 Complete Procedures Checklist (**Appendix C**)

4.6 Guidelines on location

The location is important with consideration to:

4.6.1 The recording of the procedure in order to protect both the officers of WCC and Travellers in relation to cash handling and the ability at the termination of stay to return the deposits to the correct persons.

4.6.2 The ability to deal with the gathering of Travellers for the duration of the procedure.

4.6.3 The proximity of the location to the Unauthorised Encampment and the ESP.

4.7 The cash handling procedure of WCC will apply to this process. Deposits and cash will be lodged with Community Services Business Support at Barrack Street.

4.8 Occupancy Costs.

4.8.1 There is a requirement to provide portable toilets, waste water facilities, provision of refuse collection and water supply. How to connect water supply is detailed in **Appendix D**. (**Appendix E** outlines the likely costs of supplying such facilities and this will be updated each time the facility is used)

4.9 Completion of procedure

4.9.1 The Travellers will be directed to the site with WCC staff and Police ensuring that their transition is monitored and assisted in order to facilitate a safe passage of the group. The priority being a focus on road safety of the group and other road users. Dependant on the size of the group and the vehicles used may have some bearing on the methods used to assist this process in the interests of safety and minimal disruption. Gates to the site will be open prior to arrival to limit the time vehicles are on the highway.

4.9.2 Access to the ESP should be by the Ridge Lane/Pipers Lane direction ONLY.

4.9.3 Police will make contact with WCC street lighting requesting that agreed street lighting be considered to be activated for the duration of the occupation to assist safety and security of the community. The below statement has been agreed:

Should the Oldbury Road ESP be used we will seek to activate the lights along the length of Oldbury Road from its junction at Church Road for the duration of its length which has lighting columns. This is on the basis of seeking to assist safety and security of access to/from the site.'

4.9.3 Opening the Site

Please refer to Appendix D which is a 17 Step Guide on how to open the site.

5. **DURING OCCUPANCY**

5.1 Initial Occupation

5.1.2 Once on site WCC staff will supervise the allocation of pitches. Details of their agreements will again be explained with special attention given to Fire and Safety, provision of amenities and the consequences of breaches in the agreement.

5.1.2 Daily Visits will be carried out by WCC staff, Local Authority staff and the local Safer Neighbourhood Policing Teams. All visits will be recorded/logged by staff and any issues communicated appropriately.

5.2 Maintenance of Amenities

5.2.1 On each visit the amenities will be checked and arrangements made to empty as required. Staff will be on site to supervise the servicing of the amenities.

5.3 Enforcement

5.3.1 Breaches of the agreements will be dealt with in consultation the WCC legal team and eviction from site will be considered.

5.3.2 Failure to pay rent/Overstays. These will be treated as Unauthorised Encampments and the appropriate course of action will be considered by WCC Legal Team with consideration for Common Law power eviction and use of bailiffs to prevent asset damage and continued unlawful occupation.

6. **POST OCCUPATION**

6.1 Prior to leaving site. An inspection will take place by WCC staff. Any issues such as damage to the site, damage to the amenities and rubbish will be brought to the attention of the group and proportionate costs will be calculated to then be deducted from the deposit.

6.2 See 4.5.5 regarding leaving prior to inspection

6.3 Arrangements will be made for the group to leave the site and attend a location for the return of the agreed deposits.

6.4 Contact will be made to collect the amenities from the site as soon as possible to prevent damage. Staff will be present on site at the time of collection to hand over the amenities

6.5 Water supply to the site will be disconnected. This is detailed in Appendix B

6.6 As soon as the site has been vacated it will be secured and a photographic record of inspection should be taken and placed into **Appendix G** (end of use report)

7 **Maintenance**

7.1 Following the inspection, arrangements will be made for the repair of any damage and the clearance of waste from the site. Any damage or defect that makes the site inoperable should be prioritised. Other repairs should be dealt with as per WCC permanent sites for schedule maintenance via the Hotline service.

7.2 During periods of non-occupation the sites will be visited on a monthly basis to ensure they are available if required. Any issues encountered will be dealt with as above.

7.3 Records of all visits including time, date, officer, condition, issues and repairs should be kept by the Gypsy and traveller team.

7.4 This document will be reviewed after each occupation by the Gypsy and Traveller Team Manager to reflect best practice and maintenance a fit for purpose procedure, and reviewed annually regardless.

Gypsy and Traveller ESP Management Procedure

Date of Changes	Originator	Version Number	Next review
Jan 18	Martyn Stephens	Draft	
25.1.18	Martyn Stephens	Version 1 agreed, Fridays, movement to site.	
23.4.18	Martyn Stephens	Version 2 , includes street lighting	
13.3.19	Martyn Stephens	Version 3, to include the new AD position for decision making and removal of Southam site from the document.	
23.8.19	Martyn Stephens	Draft of Version 4 to be discussed 2.9.19 and training meeting	
24.10.19	Paul Gibbs	Version 4 created. To be reviewed with MS.	
28.11.19	Paul Gibbs	Version 5 created. To be reviewed with MS	
11.2.20	Paul Gibbs	Version 6 created. Final version. To be reviewed by MS and CB before distribution to partners.	

APPENDIX E

Item	Supplier	Cost	Contact
Toilets	HSS	£7.60/day (£38/week) Delivery & collection £70.00	0345 608 8811
Waste-Water	D Tox or HSS	£15.00 for 500- gallon tank TBC	Leanne Rose 0800 999 2260 DD: 01922 716722 0345 608 8811
Waste-Water Removal Tank	D Tox or HSS	Varies according to amount TBC	Leanne Rose 0800 999 2260 DD: 01922 716722 0345 608 8811
Water	Water Direct	Aquacube £349.00	Tiffany Tidmarsh 0345 345 1725
Bins	NWBC	Nil	Mark Kennall or Steve Brown T: 01827 262463
Block removal	WCC Countryside and Parks Peter Richards Plant Hire	Nil £200	 Peter Richards 07851 440329

Appendix List:

A = S.62A Notice

B = Risk Assessment

C = Pitch Agreement & Procedures Checklist

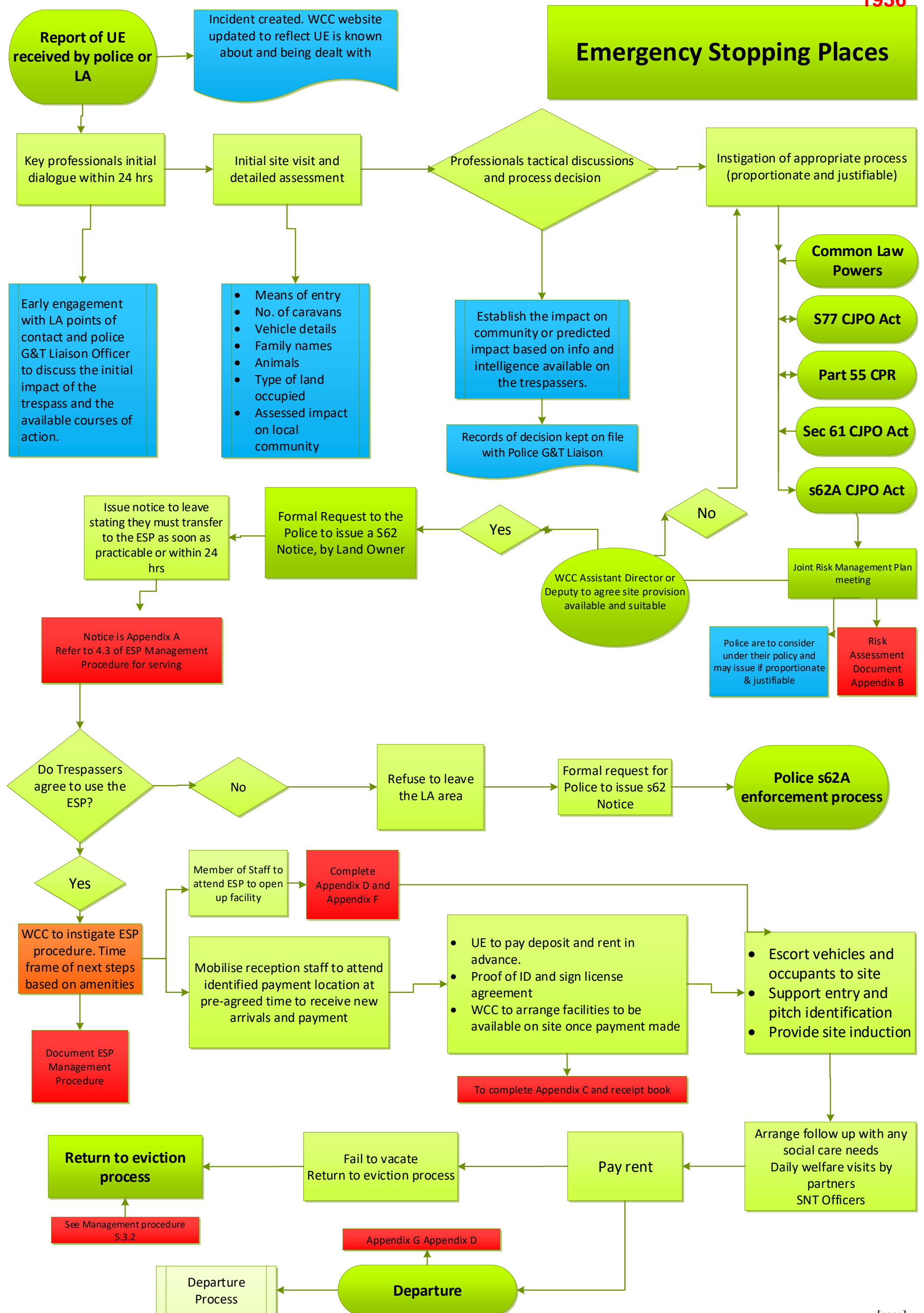
D = How to Open site & Connect Water Supply

E = Contractor Contact Detail

F = Prior Occupation Site Assessment Form

G = Post Occupation Site Assessment Form

H = OOH Emergency & Hotline Contact Details



IN THE HIGH COURT OF JUSTICE

Claim No:

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND
SECTION 187B TOWN AND COUNTRY PLANNING ACT 1990

BETWEEN:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

**(1) THOMAS CORCORAN & [] OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM**

**(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

WITNESS STATEMENT OF CAROL INGLESTON

I Carol Ingleston of Nuneaton and Bedworth Borough Council Town Hall Nuneaton
CV11 5AA

WILL SAY as follows:

1. I make this witness statement in support of the Claimant's application for an injunction pursuant to Section 222 of the Local Government Act 1972. I am duly authorised by the Claimant to make this witness statement. I make it from my own information, knowledge and belief save where otherwise stated.
2. I am employed by the Claimant as a Technical Officer in the Private Sector Housing Section within Nuneaton and Bedworth Borough Council ("The Council"). As part of my duties, I have responsibility for dealing with unauthorised encampments in the Borough and I have undertaken this role for 20 years.

3. Since 3 March 2019, when the Order was granted, there have been 6 unauthorised encampments consisting of caravans and vehicles on land belonging to Nuneaton and Bedworth Borough Council where the sites are covered by the Injunction Order. These encampments are listed on the table marked and produced as Exhibit C11a. The unauthorised encampments have been formed in public open spaces, recreation grounds and car parks. Travellers have occupied Council owned land for a total of 11 days since 3 March 2019 when the injunction came into force.
4. The Claimant has been able to effectively manage unauthorised encampments with the assistance of Warwickshire Police by explaining the implications of remaining on the land in breach of the injunction order to site occupiers. This has resulted in a large decrease in both the number and duration of unauthorised encampments experienced in the Borough.
5. On 19 April 2019, 5 caravans camped on land at Miners Welfare Park, Bedworth. This was over the Easter break and there was not any contact with the occupiers of the caravans. The caravans left without Council enforcement on 22 April 2019 and there was not a clean-up cost or a repair cost.
6. On 3 May 2019, 5 caravans camped on land at Stanley Road, Nuneaton. I attended the site to carry out a welfare check. On finding that there was not a welfare need, Warwickshire Police explained the consequences of remaining on the land. The caravans left without Council enforcement on the same day and there was no clean-up or repair costs incurred.
7. On 9 May 2019, 2 caravans camped on land at Dunns Close, Nuneaton. I attended the site to carry out a welfare check. On finding that there was not a welfare need, Warwickshire Police explained the consequences of remaining on the land. The caravans left without Council enforcement on 10 May 2019 and there was not a clean-up cost or a repair cost.
8. On Saturday 6 July 2019, 2 caravans camped on land at The Dingle, Nuneaton to the rear of Camp Hill primary school which had closed the previous year due to unauthorised encampments. Robert Watson reported the matter to Warwickshire Police who explained the consequences of remaining on the land to the site occupiers. The caravans left without further Council involvement on Sunday 7 July 2019 with no clean up or repair costs incurred.
9. On 23 September 2019, 1 caravan camped on land at Beverley Avenue, Nuneaton. Warwickshire Police attended to explain the consequences of remaining on the land. The caravans left without Council enforcement on 23 September 2019 and there was not a clean-up cost or a repair cost
10. On 20 December 2019, 1 caravan camped on land at Dunns Close, Nuneaton. Warwickshire Police attended to explain the consequences of remaining on the land. The caravans left without Council enforcement on 20 December 2019 and there was not a clean-up cost or a repair cost.

11. I am concerned that if a Final Injunction is not awarded unauthorised encampments will occur much more frequently again on council owned land and for longer periods of time. This will result in increased costs, distress and inconvenience to local residents. The majority of the open space belonging to the Council is not well fortified and the existing gates and locks are easily broken.
12. The Council usually seeks possession of land under section 77 of the Criminal Justice and Public Order Act 1994 and this course of action was prevalent before the Interim Injunction Order was awarded. In my experience of dealing with unauthorised encampments throughout the Borough the Injunction Order has dealt with unauthorised encampments to very good effect. The significantly lesser amount of time the encampments remain on the land has greatly reduced their environmental and public health impact as previously human excrement was a common problem and health hazard left by occupiers of encampments.
13. The Council have previously spent a total of £64,000 during 2012-2015 on target hardening measures in order to protect Council owned land. This has not prevented the aforementioned encampments and all of these sites have been previously protected.

Statement of truth

I believe that the facts stated in this Witness Statement are true.

Signed _____

Date _____

Statement on behalf of the Claimant
Witness: C Ingleston
1st Statement
Dated:
Exhibits "CI1" – "CI24"

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No:

IN THE MATTER OF SECTION 222 OF
THE LOCAL GOVERNMENT ACT 1972

BETWEEN

NUNEATON AND BEDWORTH
BOROUGH COUNCIL

Claimant

-and-

(1) THOMAS CORCORAN
(2) PERSONS UNKNOWN

Defendants

THIS IS THE EXHIBIT MARKED "C11" REFERRED TO IN THE WITNESS
STATEMENT OF CAROL INGLESTON

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE NICKLIN

B E T W E E N:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2) –(53) NAMED DEFENDANTS
(54) PERSONS UNKNOWN

Defendants

-and-

(1) LONDON GYPSIES AND TRAVELLERS
(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIASON GROUPS

Interveners

EXHIBIT 'PR 5'

Report to Informal Cabinet

Date: 4th March 2020

From: Director – Arts, Leisure & Democracy:

Title: Traveller Injunction update

1. Introduction

It is now about a year since the Council obtained an interim injunction related to the traveller incursions experienced by the Council between 2016 and 2018. The order granted by the High Court was interim, pending an application for a final order, but it remains in effect until an application is made to have it removed.

2. Issues

Officers have been keeping the operation of the injunction under review and the general effect has been positive insofar as the police have demonstrated a willingness to enforce the injunction where applicable. This has reduced the number of incursions throughout 2019 (although not entirely).

Because of a legal case that was being considered by the Court of Appeal, no action has been taken to proceed with a final application. This case, involving the London Borough of Bromley, was heard in later December and judgment was issued in January of this year.

The Court laid down some particular requirements when seeking a Borough-wide injunction, part of which was aimed at ensuring that areas have appropriate provision for travellers. In such circumstances, the chances of a successful application are greater than areas where there is a traveller site provision shortfall. Interestingly, the Court endorsed the making of an order in the case of Harlow, in view of the extreme circumstances being encountered there. By analogy, the same endorsement would apply to this Council's injunction, given the comments by HHJ Straker when making the order that the circumstances were very similar.

Despite this, the Council has now received a letter (see Appendix A) from the National Federation of Gypsy Liaison Groups seeking withdrawal of the Injunction and confirmation that the Council will not seek its renewal (which may refer to an application for Final Order).

3. Proposals

The cost of obtaining the Interim injunction was in the region of £100,000 and it is anticipated that similar costs will need to be incurred in the application for a Final order. Much of the cost related to the cost of service of documents which, with a mobile community, is always problematic.

Officers have sought advice from Caroline Bolton on the merits of an application for a Final order, anticipating that the Federation may well instruct Counsel to oppose it.

The advice has been requested before this meeting and will be reported orally. However, the initial view is that, having followed the correct procedure (unlike Bromley), the Council should be in a position to pursue the application. If Counsel agrees, she has been asked to settle the letter of reply to the NFGLG and advise on the next steps. Counsel is aware that Cabinet is being asked to consider whether to pursue the final order.

4. Conclusion

This will be subject to the advice of Counsel

5. Recommendation

- (a) Subject to the advice of Counsel, a response be sent to the NFGLG advising them that the Council intends to pursue an application for a Final order; and
- (b) Preparations be made for the application.

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE NICKLIN

B E T W E E N:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2) –(53) NAMED DEFENDANTS
(54) PERSONS UNKNOWN

Defendants

-and-

(1) LONDON GYPSIES AND TRAVELLERS
(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIASON GROUPS

Interveners

EXHIBIT 'PR 6'

Andrea Stubbs

From: William Rose
Sent: 14 October 2020 18:47
To: Waheeda Sheikh
Cc: Philip Richardson; Lee Wright; Anna Sidebottom; Caroline Bolton
Subject: Injunction conference

Waheeda

Caroline has confirmed that she is available for a conference next Wednesday at 10.30

Best wishes

Sent from my iPhone

William Rose | Partner and Privy Council Agent
 For Sharpe Pritchard LLP

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Andrea Stubbs

From: William Rose
Sent: 16 October 2020 16:54
To: Philip Richardson; Waheeda Sheikh; Lee Wright; Caroline Bolton
Cc: Anna Sidebottom
Subject: Nuneaton and Bedworth B.C. - Travellers (170.19)
Attachments: Electronic Distribution Document for Case QB-2019-000616: Nuneaton & Bedworth Borough Council and another v Corcoran And 52 Others

Dear All

I refer to recent emails about the proposed conference next week.

I forward the email from the Court which simply attaches the Order of Mr Justice Nicklin dated 16 October 2020 which appears to have been distributed to all parties involved in these types of claims.

The timing is quite good in that we need a conference on this in any event to decide what action to take generally and specifically in the light of the Order attached to this email. I have not yet read it properly but will do so shortly. However, I believe that I am waiting for Waheeda/Philip to decide on the date and timing of any conference.

I wish you all a good weekend.

Kind regards

William Rose | Partner and Privy Council Agent
 For Sharpe Pritchard LLP

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Andrea Stubbs

From: noreply@thomsonreuters.com
Sent: 16 October 2020 16:44
To: William Rose
Subject: Electronic Distribution Document for Case QB-2019-000616: Nuneaton & Bedworth Borough Council and another v Corcoran And 52 Others
Attachments: Attachment.pdf

HM Courts & Tribunals Service
Royal Courts of Justice CMS

Documents have been distributed to you.

Claim Nos: see attached schedule

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

The Honourable Mr Justice Nicklin
16 October 2020

BETWEEN: -

Various Claimants
(see attached Schedule 1)



-and-

(1) Persons Unknown
(2) Various other Defendants
(see attached Schedule 1)

Defendants

ORDER

THIS ORDER had been made with the concurrence of the President of the Queen's Bench Division and Mr Justice Stewart, the Judge in Charge of the Queen's Bench Division Civil List

UPON the Court in the claim *London Borough of Enfield -v- Persons Unknown* (QB-2020-003471) ("the *Enfield* case") having, on 2 October 2020:

- adjourned the Claimant's Application for an interim and final injunction against Persons Unknowns who enter and/or occupy any of 96 sites in the London Borough of Enfield for residential purposes (whether temporary or otherwise) including siting a caravans, mobile homes, associated vehicles and domestic paraphernalia ("the Application");
- directed a hearing of the Claimant's Application which has been fixed for 2 days on 27-28 January 2021;

- directed a Case Management Hearing which has been fixed for 17 December 2020 (“the Case Management Hearing”); and
- directed that the Attorney General be invited to instruct an advocate to the court given the wider issues of public importance raised by the Application

AND UPON it appearing that:

- injunctions in similar terms to that granted in the **Enfield** case may have been granted in the actions identified in Schedule 1 to this Order;
- it is likely that common issues or considerations are likely to arise in the actions identified in Schedule 1 to this Order; and
- the most proportionate way of managing the resolution of any common issues is by identifying lead cases from amongst the actions identified in Schedule 1 to this Order

WITHOUT A HEARING AND OF THE COURT’S OWN MOTION IT IS ORDERED:

1. Pursuant to CPR 30.2(4) and s.41 County Courts Act 1980, the actions identified 18, 19, 21, 29, 31, 32, 35 and 36 in Schedule 1 are forthwith transferred to the High Court, Queen’s Bench Division, Royal Courts of Justice.
2. By 4.30pm on 30 October 2020, each Claimant in actions identified 18, 19, 21, 29, 31, 32, 35 and 36 are to upload to the CE-File copies of:
 - a. the Claim Form (and any Particulars of Claim if applicable)
 - b. all Application Notices filed in the claim; and
 - c. all orders made by the Court in the claim.
3. By 4.30pm on 30 October 2020, all other Claimants (not covered by Paragraph 2 above) are to ensure that the Claim Form, all Application Notices filed in the claim and all orders made by the Court in their actions are available on the CE-File, by uploading any missing documents.
4. By 4.30pm on 13 November 2020, each Claimant in the actions identified in the attached Schedule 1 must file in the action (and provide a copy to the Clerk to Mr Justice Nicklin: Daniel.Mendonca@justice.gov.uk) a completed and signed Questionnaire (Schedule 2).
5. Any Claimant who answers either Question 8(a) or 8(b) in the Questionnaire “yes”, must attend or be represented at the Case Management Hearing.
6. Any Claimant who, having considered the Court of Appeal decisions in **Bromley LBC -v- Persons Unknown [2020] PTSR 1043** and **Canada Goose UK Retail Ltd -v- Persons Unknown [2020] 1 WLR 2802**, wishes to:

- a. discontinue its claim under CPR 38.2, or
- b. apply to vary or discharge any current injunction previously granted in its favour

must issue, file and serve an Application Notice by 4.30pm on 13 November 2020 and, unless the Court otherwise orders, the Application will be heard at the Case Management Conference.

- 7. Until further order, any application in each of the actions identified in Schedule 1 must be made to Mr Justice Nicklin.
- 8. Pursuant to CPR 3.3(5), any person affected by this Order may apply to the Court for it to be varied. Any such application:
 - a. must be made by Application Notice and supported by evidence;
 - b. issued and filed by 4.30pm on 23 October 2020; and
 - c. will be determined by Mr Justice Nicklin.

Reasons

- (A) The recent hearing in the **Enfield** case has led to the identification of issues that are likely to arise in other cases involving the grant of local authority wide injunctions to prohibit trespass on land granted against Persons Unknown who have typically, but not exclusively, been defined as Gypsies or Travellers ("Traveller Injunction"). The issues concern existing injunctions that have previously been granted (in most cases for several years) as well as applications for new or renewed injunctions of this type. The principles upon which such injunctions are granted have been subject to review in a series of cases: **Cameron -v- Liverpool Victoria Insurance Co Ltd** [2019] 1 WLR 1471; **Boyd -v- Ineos Upstream Ltd** [2019] 4 WLR 100; **Bromley LBC -v- Persons Unknown** [2020] PTSR 1043; **Cuadrilla Bowland Ltd -v- Persons Unknown** [2020] 4 WLR 29; and **Canada Goose UK Retail Ltd -v- Persons Unknown** [2020] 1 WLR 2802.
- (B) The Court has identified the cases listed in Schedule 1 as claims in which Traveller Injunctions may have been granted in the past. The Court has held, in the **Enfield** case [32], that a local authority which has, in the past, obtained a Traveller Injunction is under a duty to restore the claim before the court if it becomes aware that there exist grounds upon which there is a realistic prospect that the injunction would be modified or discharged by the Court. This includes grounds that arise as a result of a change in the legal principles that apply. Any local authority not identified in Schedule 1 which has been granted a Traveller Injunction should provide the details to the Clerk to Mr Justice Nicklin (details in Paragraph 4 of this Order).

- (C) It is likely that common issues will arise between the **Enfield** case and those identified in Schedule 1 (and any other cases in which a Traveller Injunction has been granted). The Court wants to manage the resolution of any common issues in an effective and proportionate manner. The Order provides (a) for transfer of Claims in Schedule 1 to the Queen's Bench Division of the High Court at the Royal Courts of Justice; (b) for completion of a Questionnaire to gather information about the Schedule 1 Claims; and (c) a Case Management Hearing on **17 December 2020** which will enable the Court to identify the extent of common issues and determine the best way of resolving them.
- (D) Prior to formulation of any common issues, the Court's first objective is to identify those local authorities with existing Traveller Injunctions who wish to maintain such injunctions (possibly with modification), and those who wish to discontinue their claims and/or discharge the current Traveller Injunction granted in their favour.

16 October 2020

SCHEDULE 1

	Claimant(s)	Defendants	CASE No:
1.	LB Barking and Dagenham	Tommy Stokes & 63 others	QB-2017-006899 (HQ17X00849)
2.	LB Bromley	Persons Unknown	QB-2018-003485 (HQ18X02920)
3.	LB Croydon	Persons Unknown	QB-2018-003395 (HQ18X03041)
4.	LB Ealing	Persons Unknown	QB-2019-001696
5.	LB Greenwich	Persons Unknown	QB-2018-003037 (HQ18X04086)
6.	LB Havering	William Stokes & 104 others and Persons Unknown	QB-2019-002737
7.	LB Hillingdon	Persons Unknown	QB-2019-001138
8.	LB Hounslow	Persons Unknown	QB-2019-002113
9.	LB Kingston-upon-Thames	Persons Unknown	QB-2019-000150
10.	LB Merton	Persons Unknown	QB-2018-000452
11.	LB Redbridge	Martin Stokes & 99 others	QB-2018-003983 (HQ18X01522)
12.	LB Richmond-upon-Thames	Persons Unknown	QB-2019-000777
13.	LB Sutton	Persons Unknown	QB-2018-003487 (HQ18X02913)
14.	LB Waltham Forest	Persons Unknown	QB-2017-005691 (HQ17X03769)
15.	LB Wandsworth	Persons Unknown	QB-2019-000778
16.	(1) Basingstoke and Deane Borough Council (2) Hampshire County Council	Henry Loveridge & 115 others and Persons Unknown	QB-2018-003748 (HQ18X02304)
17.	(1) Basildon Borough Council (2) Essex County Council	Dennis Ainey & 44 others and Persons Unknown	QB-2017-005724 (HQ17X03732)
18.	Birmingham City Council	Persons Unknown	Birmingham District Registry D90BM148-149
19.	(1) Boston Borough Council (2) Lincolnshire County Council	Persons Unknown	Birmingham District Registry E90BM073
20.	Canterbury City Council	Persons Unknown	QB-2019-001304
21.	Central Bedfordshire	Levi Parker & 21 others and Persons Unknown	Bedford District Registry E01LU344
22.	Elmbridge Borough Council	Persons Unknown	QB-2018-003423 (HQ18X02948)
23.	Epsom and Ewell Borough Council	Persons Unknown	QB-2018-000383

24.	(1) Harlow District Council (2) Essex County Council	Michael Stokes & 71 others	QB-2015-002380
25.	Hertsmere Borough Council	Persons Unknown	QB-2018-000333
26.	(1) Nuneaton and Bedworth Borough Council (2) Warwickshire County Council	Thomas Corcoran & 52 others and Persons Unknown	QB-2019-000616
27.	Reigate and Banstead Borough Council	Persons Unknown	QB-2019-002297
28.	Rochdale Metropolitan Borough Council	Shane Heron & 91 others	QB-2017-005202 (HQ17X04668)
29.	Rugby Borough Council	McDonough & 5 others and Persons Unknown	Nuneaton County Court E00NU379
30.	Runnymede Borough Council	Andrew Doig & 15 others and Persons Unknown	QB-2017-006641 HQ17X01528
31.	Sandwell Metropolitan Borough Council	John Cassidy & 13 others and Persons Unknown	Birmingham District Registry D90BM116
32.	Solihull Metropolitan Borough Council	John Cassidy & 13 others and Persons Unknown	Birmingham District Registry E90BM026
33.	Test Valley Borough Council	Albert Bowers & 88 others and Persons Unknown	QB-2020-002112
34.	Thurrock Council	Martin Stokes & 106 others and Persons Unknown	QB-2019-002738
35.	Walsall Metropolitan Borough Council	Brenda Bridges & 17 others and Persons Unknown	Walsall County Court C00WJ967
36.	Wolverhampton City Council	Persons Unknown	Birmingham District Registry E90BM139
37.	Wycombe District Council	Persons Unknown	QB-2019-002783

Schedule 2 - Questionnaire

Details of Claim:

Name of Claimant:

Name(s) of Defendant(s):

RCJ Case Number:

Previous District Registry (if applicable):.....

Service of the Claim Form

1. Has the Claim Form been personally served in accordance with CPR 6.5 on any Persons Unknown?

.....

2. Has the Court made an order for alternative service of the Claim Form on Persons Unknown under CPR 6.15(1) or CPR 6.15(2)?

.....

If no, go to Question 3.

If yes,

- a. Did you issue an Application for an order for alternative service of the Claim Form under CPR 6.15(1) or 6.15(2)?

.....

- b. Does the Order for alternative service comply with CPR 6.15(4)?

.....

- c. provide a copy of the order for alternative service of the Claim Form on Persons Unknown.

3. Has the Court made an order dispensing with service of the Claim Form on Persons Unknown under CPR 6.16?

.....

4. Has any defendant in the category of Persons Unknown filed an Acknowledgement of Service?

.....

Injunction

5. In your claim, is there an injunction currently in force against Persons Unknown?

.....

If no, you need not answer any further questions.

If yes,

- a. When was it granted?

.....

- b. Is it an interim or final order?

.....

- c. When does the injunction expire?

.....

- d. If an interim order, when is the next hearing?

.....

- e. If it is a final order, do the terms of the injunction purport to apply to and bind “newcomers” (as defined in ***Canada Goose UK Retail Ltd -v- Persons Unknown* [2020] 1 WLR 2802** [89]):

.....

- f. Please provide a copy of the Order

6. Has the Injunction order been served on identified (or identifiable) individuals in the category of Persons Unknown?

.....

If yes, on a separate sheet, identify (by name or other method) those served with the Injunction and when they were served.

7. If a final injunction has been granted in your claim, is it possible to identify (by name or other method) those against whom, in the category of persons unknown, judgment has been granted?

.....

If yes, on a separate sheet, identify (by name or other method) those against whom judgment has been granted.

8. Having regard to the Court of Appeal decisions in ***Bromley LBC -v- Persons Unknown* [2020] PTSR 1043** and ***Canada Goose UK Retail Ltd -v- Persons Unknown* [2020] 1 WLR 2802**:

- a. Are you satisfied that the injunction you have previously been granted complies with the principles identified in these decisions?

.....

- b. Do you intend to seek an extension to the injunction that you have been granted (whether by application in the current proceedings or fresh claim)?

.....

9. If applicable, when is the next hearing listed for your case?

.....

Statement of Truth

(I believe) (The applicant believes) that the facts stated in this questionnaire (and any continuation sheets) are true.

Signed: **Full name:**
Claimant's (legal) representative

Name of legal representative's firm (if applicable):

Position or office held:
(if signing on behalf of the Claimant, firm or company)

Date:

WS on behalf of the Claimant
Sgt A. Scruton
2nd Statement
Dated: 01.09.2021

Claim No: QB-2019-000616

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

**In the matter of Section 222 Local Government Act 1972 and Section 187B Town
and Country Planning Act 1990**

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN

(2) –(53) OTHER NAMED DEFENDANTS

**(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

WITNESS STATEMENT OF POLICE SERGEANT ANDREW SCRUTON 0946

I, Police Sergeant Andrew Scruton 0946, of Warwickshire Police, Nuneaton Police Station, Warwickshire Justice Centre, Vicarage Street, Nuneaton CV11 4DW,

WILL SAY as follows:

1. I am duly authorised to make this statement in support of the Claimant's application for an injunction pursuant to Section 222 of the Local Government Act

1972 and Section 187B of the Town and Country Planning Act 1990. I make it from my own information, knowledge and belief save where otherwise stated.

2. I make this statement to support the information provided in my first statement made on the 6th March 2019, regarding the traveller encampments within the area of Nuneaton and Bedworth between the period 4th August 2014 to 24th January 2019.

Background

3. In my first statement I have summarised and attached copies of the Storm reports of the incidents of unauthorised encampments in the Borough, and I referred to the family names of those individuals who were prominent in the area at the time, namely the Corcoran's, the Dodd's, the Delaney's, the Stokes' and the Maughan's (amongst others). The Storm reports are reports taken by the operator at the time of the incident (i.e. the unauthorised encampment); they do not contain the names of the individuals involved in the relevant incident, as these would not be known to them at the time of the incident, but would have been gathered thereafter from the vehicle checks conducted at the time. Revisiting the notes made at the time of the incidents referred to in the exhibited Storm reports has enabled me to link the individuals named in these proceedings to the specific incident logs.
4. The encampments referred to at para 5.1 & AS1, para 5.2 & AS2, para 5.10 & AS10, para 5.11 & AS11, para 5.15 & AS15, para 5.16 & AS16, para 5.17 & AS17, para 5.21 & AS21, para 5.22 & AS22, para 5.39 & AS39, para 5.46 & AS46, para 5.47 & AS47, para 5.48 & AS48 and para 5.49 & AS49 (all references to my first statement and accompanying exhibits) were all relatively large encampments. These encampments were occupied by the named defendants from the Corcoran, Dodds, Stokes and Delaney families, who were at times joined by the named members of the McDonagh, Doyle, Mongan and Maughan families (those individuals being identified and named in the Claim Form and Interim Injunction Order).
5. One key element to the encampments referred to above was that, contemporaneous with those encampments, the Corcoran family had attracted growing support from associate families for their young daughter, who was

extremely ill and undergoing treatment at the Queen Elizabeth Hospital Birmingham and the University Hospital Coventry.

6. Of all the encampments suffered by the Borough, it is the encampments including the families and individuals named in these proceedings that have had the greatest detrimental impact on the land and local communities. These family groups and their encampments also had a similar impact across the County, and particularly in the Warwick District as they moved between the two areas.
7. Thomas Corcoran and Dennis Stokes featured frequently in these encampments; they were present most of the time, and they are most certainly influential characters whose presence had a following.
8. Both of the Corcoran and Stokes families are now residing on Kirby Glebe farm in North Warwickshire along with other associated nominals in the Delaney families.

Identification of Named Defendants

9. I can confirm that I have re-examined the evidence that I provided in 2019, the associated Storm reports relating to the unauthorised encampments and the PNC to confirm the vehicle checks carried out on 18th November 2018 (following a request to do so from the Claimant) of the insured or registered keeper of the vehicles noted as being on the land at the time of these encampments. I can confirm that the sources I have examined show that the named defendants in these proceedings are linked to vehicles noted as being present at the encampments, as set out below.
10. In my first statement at para 5.20 I refer to the encampment at the Gala Fields, Avenue Road, Nuneaton between 21.06.2018 and 04.07.2018 and attach the police incident log at 'AS20'. The PNC records shows that the following vehicles were present at the encampment at the time and confirm the details of registered keepers of those vehicles as follows:
 - FN18HEJ linked to Winnie McDonagh and Martin McDonagh
 - HX18TWJ linked to John McDonagh and Bernard McDonagh.
 - HGZ8090 linked to Mike McDonagh.

11. At para 5.19 I refer to an encampment at Vernon's Lane, Nuneaton on 08.07.2018 and attach the police incident logs at 'AS 18'. The PNC records shows the following vehicles as being present at the encampment and the details of the registered keepers of those vehicles at the time:

- **BL66XGK** linked to **Alphonsus McGinley**
- **SK67PNY** linked to **Luke Delaney**
- **AV13OHZ** linked to **Martin Mongan,**
- **HJ18EFT** linked to **Leonard Mongan.**
- **L518XXB** linked to **Aaron McDonagh**
- **SL18UVO** linked to **Martin Maughan**
- **FL18XZZ** linked to **Owen Maughan.**

12. At para 5.15 I refer to an encampment at the Pingles Leisure Centre Car Park, Avenue Road, Nuneaton between the 24.08.2018 and 30.08.2018 and attach the police incident logs at 'AS 15'. The PNC records show the following vehicles as being present at the encampment and the details of the registered keepers of those vehicles at the time:

- **MT17WJV** linked to **Martin Ward.**
- **LM67WZX** linked to **Michael Stokes.**
- **SL18JXU** linked to **Luke Delaney and Jessica Dodds.**
- **EO18VWV** linked to **John Connors**
- **SL18UYE** linked to **Thomas Corcoran.**
- **YM15UNV** linked to **William Bridges.**
- **SN17OEA** linked to **Patrick McGinley.**
- **HJ18BUH** linked to **Martin Mongan.**
- **BJ64TNE** linked to **John Maughan.**
- **AO15WJF** linked to **John Mongan.**
- **YD18NLX** linked to **Michael Ward. and Frances Corcoran.**

13. At para 5.18 I refer to an encampment at the Keresley Community Centre, Nuneaton between 27.07.2018 to 01.08.2018 and attach the police incident logs at 'AS 18'. The PNC records show the following vehicles as being present at the

encampment and the details of the registered keepers of those vehicles at the time:

- **YS17ZBX** linked to **Pat Ward**
- **WK18YDL** linked to **Thomas Maughan**.
- **NV17NLL** linked to **Bernie Sweeney**.

14. At para 5.11 I refer to an encampment at Vernon's Lane, Nuneaton between 13.09.2018 to 14.09.2018 and attach the police incident logs at 'AS 11'. The records show the following vehicles as being present at the encampment and the details of the registered keepers of those vehicles at the time:

- **ND13DZE** linked to **Michael Stokes**.
- **SN67ZNR** linked to **Michael Stokes**.
- **ND82HWJ** linked to **Owen Maughan**.
- **HG67QJV** linked to **Francis Maughan**.
- **SN68UHS** linked to **Terry Maughan**.
- **DV18BEJ** linked to **Paul McDonagh**.
- **LG64AEM** linked to **Kathleen Ward**.
- **SN18LOF** linked to **Michael Stokes**.
- **MM15WVE** linked to **Patrick McGinley**.

15. At para 5.17 I refer to an encampment at the Gala Fields, Avenue Road, Nuneaton between 06.08.2018 to 16.08.2018 and attach the police incident logs at 'AS 17'. The records show the following vehicles as being present at the encampment and the details of the registered keepers of those vehicles at the time:

- **SN66WZX** linked to **Terry Maughan**.
- **SN17OEA** linked to **Patrick McGinley**.
- **YN15UNV** linked to **Patrick Maughan**.
- **LN09SXF** linked to **Brian Stokes** and **Bernard Stokes**.
- **SL18JXT** linked to **Michael Doyle**.
- **SL18UYD** linked to **Dennis Stokes** and **Dennis Stokes JNR**.
- **LM67WZX** linked to **Michael Stokes**.
- **SM18FAJ** linked to **Thomas Corcoran**.

16. There were numerous recorded incidents associated with each encampments involving crime and anti-social behaviour. I can confirm that Thomas Corcoren was arrested and admitted damage to the picket fence to gain entry on land belonging to the Discovery Academy at Vernons Lane, Nuneaton on 13th September 2018, for which he received a Caution and paid for the damage caused. The details relating to this incident are referred to in AS 11.

Statement of Truth

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 ATSOL PS946

Dated 1 / 9 / 2021

Statement on behalf of the Claimant
Witness: Philip Richardson
Dated: 1st October 2021

IN THE HIGH COURT OF JUSTICE

Claim No: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND SECTION 187B TOWN
AND COUNTRY PLANNING ACT 1990

B E T W E E N:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN & 52 OTHER NAMED DEFENDANTS
IN SCHEDULE 1 OF THE CLAIM FORM

(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

(1) LONDON GYPSIES AND TRAVELLERS
(2) FRIENDS, FAMILIES AND TRAVELLERS
(3) NATIONAL FEDERATION OF GYPSY LIAISON GROUPS

Interveners

WITNESS STATEMENT OF PHILIP RICHARDSON

I, PHILIP RICHARDSON, Director of Planning and Regulation at Nuneaton and Bedworth Borough
Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA

WILL SAY as follows:-

1. I make this witness statement pursuant to the Order of Nicklin J dated 30TH July 2021 (the "Order"), I make this witness statement in compliance with the Order, in particular paragraph 6 of the Order.
2. Having made enquiries of the Officers of the First and Second Claimant, the Claimant confirms that the following steps have been taken in compliance with paragraphs 2 -5 of the Order as directed by Nicklin J, namely:-
 - i) An application for permission to discontinue the claim against 19 of the named defendant was made to the Court on 20th August 2021. The Application was dealt with by Mrs Justice Farbey on paper as directed and permission to discontinue against those named defendants by Order dated 23rd August 2021. I attach a copy of the Application Notice, and Sealed order marked "PR 1".
 - ii) The Claim Form was amended to delete the defendants who had not been served with the Claim Form and in respect of whom permission had been granted to discontinue the claim by Mrs Justice Farbey.
 - iii) The Amended Claim Form was filed with the Court by the 3rd September 2021.
 - iv) The Amended Claim Form together with a copy of the letter appended to the Order was served by first class post on each of the remaining named Defendants. I attach copies of the letters (together with enclosures) sent out in accordance with para 4(c) marked "PR 2".
 - v) An Application Notice seeking permission to rely upon the further evidence of Police Sergeant Andrew Scruton together with copies of the evidence was filed and served on the remaining named defendants. A copy of which is included in the enclosures referred to in "PR 2" above.
 - vi) The Amended Claim Form was reposted at each of the sites where the Claim Form was originally posted.
3. I can confirm that to date I have not been notified of any Letters being returned undelivered, nor have I received back any of the response forms sent out with the letters.

Statement of Truth

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

A handwritten signature in dark ink, appearing to be 'P. Richardson', with a long horizontal stroke extending to the right.

Philip Richardson
Director of Planning and Regulation

Dated 1st October 2021

Application notice

For help in completing this form please read the notes for guidance form N244 Notes

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form:
<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

In the High Court of Justice Queen's Bench Division	
Claim no.	QB-2019-000616
Fee Account no.	PBA0087028
Warrant no. (if applicable)	
Claimant (including ref.)	(1) Nuneaton & Bedworth Borough Council (2) Warwickshire County Council
Defendants (including ref.)	(1) Thomas Corcoran (2)-(53) Other Named Defendants (54) Persons Unknown
Date	18 August 2021

1. What is your name or, if you are a legal representative, the name of your firm?

Sharpe Pritchard LLP

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative
☐ Other (please specify)

If you are a solicitor whom do you represent

Claimant

3. What order are you asking the court to make and why?

The Claimant seeks an order in accordance with 2(a) and (b) of the Order of Mr Justice Nicklin dated 30th July 2021 for permission to discontinue the claim against the defendants in the attached Schedule in respect of whom an injunction was granted.

4. Have you attached a draft of the order you are applying for

☒ Yes

☐ No

5. How do you want to have this application dealt with?

☐ at a hearing

☒ without a hearing

☐ at a telephone hearing

6. How long do you think the hearing will last?

Hours

Minutes

Is this time estimate agreed by all parties?

☐ Yes

☐ No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

High Court

9. Who should be served with this application?

- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- ☐ the attached witness statement
- ☐ the statement of case
- ☒ the evidence set out in the box below

If necessary, please continue on a separate sheet

The Claimant applies to discontinue the claim against the 14th Defendant Terry Maughan, 28th Defendant Simon Maughan, 36th Defendant Martin Ward and 37th Defendant Pat Ward on the basis that they were not served with the proceedings and on this basis proceedings had been stayed against them by the Order of Timothy Straker QC(sitting as a Deputy Judge of the High Court) with liberty to restore. The Claimant does not wish to restore the proceedings and would request permission to discontinue the claim against them.

The Claimant further applies to discontinue the claim against the 18th Defendant Bernard Corcoran, 19th Defendant Francis Corcoran, 45th Defendant Tom Ward, 46th Defendant Eddie McDonagh, 47th Defendant Eddie Ward, 48th Defendant Christopher McDonagh, 49th Defendant William Doherty, 50th Defendant Gerry O'Brien, 51st Elizabeth O'Brien, 52nd Defendant, Pearl Blainley and 53rd Defendant Fiona Ward on the basis that the Defendants addresses were unknown at the time of service of the claim form

The Claimant applies to discontinue the claim against the 24th Defendant Martin Mongan, 34th Defendant Kathleen McDonagh, 40th Defendant Roseleen Ward and 43rd Defendant Tracey Brown on the basis that while the police information available at the time indicated that these defendants may have been part of the larger groups encamping in the Borough of Nuneaton & Bedworth at the time, we have been unable to ascertain their vehicle details and therefore we are unable to evidence precise incidents of unauthorised encampments against them at the time.

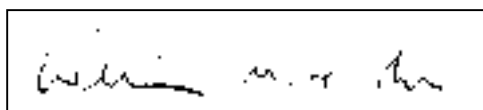


Statement of Truth

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.

- ☐ I believe that the facts stated in section 10 (and any continuation sheets) are true.
- ☒ The Applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

18

Month

August

Year

2021

Full name

William Maxwell Hunt Rose

Name of applicant's legal representative's firm

Sharpe Pritchard LLP

If signing on behalf of firm or company give position or office held

Partner

Applicant's address to which documents should be sent.

Building and street

Elm Yard, 10-16 Elm Street

Second line of address

Town or city

London

County (optional)

Postcode

WC1X 0BJ

If applicable

Phone number

020 7405 4600 / 07799 900961

Fax number

020 7204 2244

DX number

353 London/Chancery Lane

Your Ref.

WMHR/ 170.19

Email

wrose@sharpepritchard.co.uk

Schedule of in respect of named Defendants against whom claim is to be discontinued:-

- (14) Terry Maughan – 10 Thistle Grove Caravan Park, Main Road, Collin, Dumfries DG1 4JE
- (18) Bernard Corcoran – No fixed abode
- (19) Francis Corcoran – No fixed abode
- (24) Martin Mongan – 14 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL
- (34) Kathleen McDonough – 3 Orchard View, Horseman Side, Brentwood, Essex CM14 5SU
- (28) Simon McDonough – 3 Thistle Grove Caravan Park, Main Road, Collin, Dumfries DG1 4JE
- (36) Martin Ward – 73 Mullacreevie Park, Armagh BT60 4BB
- (37) Pat Ward – 333 Mullacreevie Park, Armagh BT60 4BB
- (40) Roseleen Ward – 6 St Angells Lane, Hemel Hempstead, Herts HP2 7AX
- (43) Tracey Brown – 72 Lower Ecton, Ecton Lane Caravan Site, Northants, NN3 5HQ
- (45) Tom Ward – No fixed abode
- (46) Eddie McDonough – No fixed abode
- (47) Eddie (aka Edward) Ward – No fixed abode
- (48) Christopher McDonagh – No fixed abode
- (49) William Doherty – No fixed abode
- (50) Gerry O'Brien – No fixed abode
- (51) Elizabeth O'Brien – No fixed abode
- (52) Pearl Blainley – No fixed abode
- (53) Fiona Ward – No fixed abode

IN THE HIGH COURT OF JUSTICE**QB-2019-000616****QUEEN'S BENCH DIVISION****B E T W E E N:**

**(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL**

-and-

**(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN**

**ORDER**

UPON considering on paper without a hearing the application made by the Claimant for permission to discontinue the claim against certain Defendants

IT IS ORDERED THAT:

Permission be granted to the Claimant to discontinue the claim against the following Defendants:-

- (14) Terry Maughan – 10 Thistle Grove Caravan Park, Main Road, Collin, Dumfries DG1 4JE
- (18) Bernard Corcoran – No fixed abode
- (19) Francis Corcoran – No fixed abode
- (24) Martin Mongan – 14 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL
- (34) Kathleen McDonaugh – 3 Orchard View, Horseman Side, Brentwood, Essex CM14 5SU
- (28) Simon McDonaugh – 3 Thistle Grove Caravan Park, Main Road, Collin, Dumfries DG1 4JE
- (36) Martin Ward – 73 Mullacreevie Park, Armagh BT60 4BB
- (37) Pat Ward – 333 Mullacreevie Park, Armagh BT60 4BB
- (40) Roseleen Ward – 6 St Angells Lane, Hemel Hempstead, Herts HP2 7AX
- (43) Tracey Brown – 72 Lower Ecton, Ecton Lane Caravan Site, Northants, NN3 5HQ
- (45) Tom Ward – No fixed abode
- (46) Eddie McDonaugh – No fixed abode
- (47) Eddie (aka Edward) Ward – No fixed abode
- (48) Christopher McDonagh – No fixed abode
- (49) William Doherty – No fixed abode
- (50) Gerry O'Brien – No fixed abode

(51) Elizabeth O'Brien – No fixed abode

(52) Pearl Blainley – No fixed abode

(53) Fiona Ward – No fixed abode

THE HON MRS JUSTICE FARBEY

23/08/2021

IN THE HIGH COURT OF JUSTICE

Claim Number: QB 2019 009616

QUEEN'S BENCH DIVISION

IN THE MATTER OF S22 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990

Before Timothy Straker QC (sitting as a Deputy Judge of the High Court)

On the 19th day of March 2019

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL



Claimants

-and-

(1) THOMAS CORCORAN & 53 OTHER NAMED DEFENDANTS IN SCHEDULE 1
OF THE CLAIM FORM(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

ORDER

IF YOU, ANY OF THE ABOVE NAMED FIRST TO FIFTY-THIRD DEFENDANTS OR PERSONS UNKNOWN DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

UPON HEARING COUNSEL MISS CAROLINE BOLTON FOR THE CLAIMANTS AND THE DEFENDANTS NOT ATTENDING

AND UPON READING THE PAPERS AND HEARING THE APPLICATION FOR AN INTERIM INJUNCTION PENDING THE FINAL INJUNCTION HEARING PURSUANT TO SECTION 222 LOCAL GOVERNMENT ACT 1972 AND 187B TOWN AND COUNTRY PLANNING ACT 1990

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST FOR BREACH OF PARAGRAPHS 1-9 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006 AND SECTION 1 OF THE ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014. ANY PERSON CAUGHT BREACHING PARAGRAPHS 1-10 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

Note to Arresting Officer: Where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or the Anti-social Behaviour Crime and Policing Act 2014 :-

- The defendant shall be brought before the judge within a period of 24 hours beginning at the time of their arrest
- A constable shall inform the person on whose application the injunction was granted forthwith where the defendant is arrested under these powers

Nothing in sections 27 of the Police and Justice Act 2006 or the Anti-social Behaviour Crime and Policing Act 2014 shall authorise the detention of the defendant after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculation any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

IT IS ORDERED THAT:

1. The proceedings shall be stayed against the 14th Defendant Terry Maughan, 28th Defendant Simon McDonough, 36th Defendant Martin Ward and 37th Defendant Pae Ward with liberty to restore.

Until further order, The First to Fifty-Third Defendants (save for the 14th, 28th, 36th and 37th Defendants) are forbidden from

1. Setting up or encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the Secretary of State.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia save for Thomas Corcoran (the First Defendant) and his wife Jessica Dadds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
5. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with any relevant planning or other lawful authority.

7. From causing or allowing to be erected, constructed, situated on or on the Land, unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.
8. From depositing on the Fifty-Fourth Defendant (see Schedule 2)
 - a. Setting up an encampment on any land identified on the attached map and list of sites without written permission from the local planning authority, or planning permission granted by the Secretary of State;
8. From entering and/or occupying any part of the land identified on the attached map and list of sites for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia;
9. From bringing onto the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with express permission from the owners of the land;
10. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit;
11. There be a power of arrest attached to prohibitions 7-10 of this order.

The Land in this order means:

12. For the First to Fifty-Third Defendants, all land within the administrative boundaries of Nuneaton and Bedworth Borough Council as appears within the marked red outline on the attached map at Schedule 2 of this Order. The said map clearly identifies the boundaries of the Borough of Nuneaton and Bedworth correctly and the principal towns and settlements within the Borough;
13. For Persons Unknown (the Fifty-Fourth Defendant) all the land marked on the map at Schedule 3 of this Order and identified by the key to the map and numbered 1 to 141, further details of which are on the list at Schedule 3 of this Order;
14. Service of this Order shall be by affixing a copy of this Order in a transparent envelope, or laminated copy, in a prominent position on the land;
15. The Defendants may, each of them, or anyone notified of this Order, apply to the Court on 72 hours written notice to the Court and the Chairman to vary or discharge this order (or so much of it as affects that person);
16. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

- 16. A Defendant, who is an individual, who is ordered, not to do something, must not do it himself or allow others to do it, or instruct or allow others to do it, or permit others to do it.
- 17. A Defendant, who is a corporation and which is ordered, not to do something must not do it, nor allow its directors, employees or agents to do it in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

- 19. It is a contempt of court for any person notified of this Order knowingly to disobey or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

INTERPRETATION OF THIS ORDER

- 20. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
- 21. A requirement to serve on "the Defendants" means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.
- 22. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
- 23. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990.

COMMUNICATIONS WITH THE COURT

- 24. All communication to the Court about this order should be sent to Room WC08 Royal Courts of Justice, Strand, London, WC2A 9LL (020 7947 6010).

SCHEDULE 1 – LIST OF DEFENDANTS

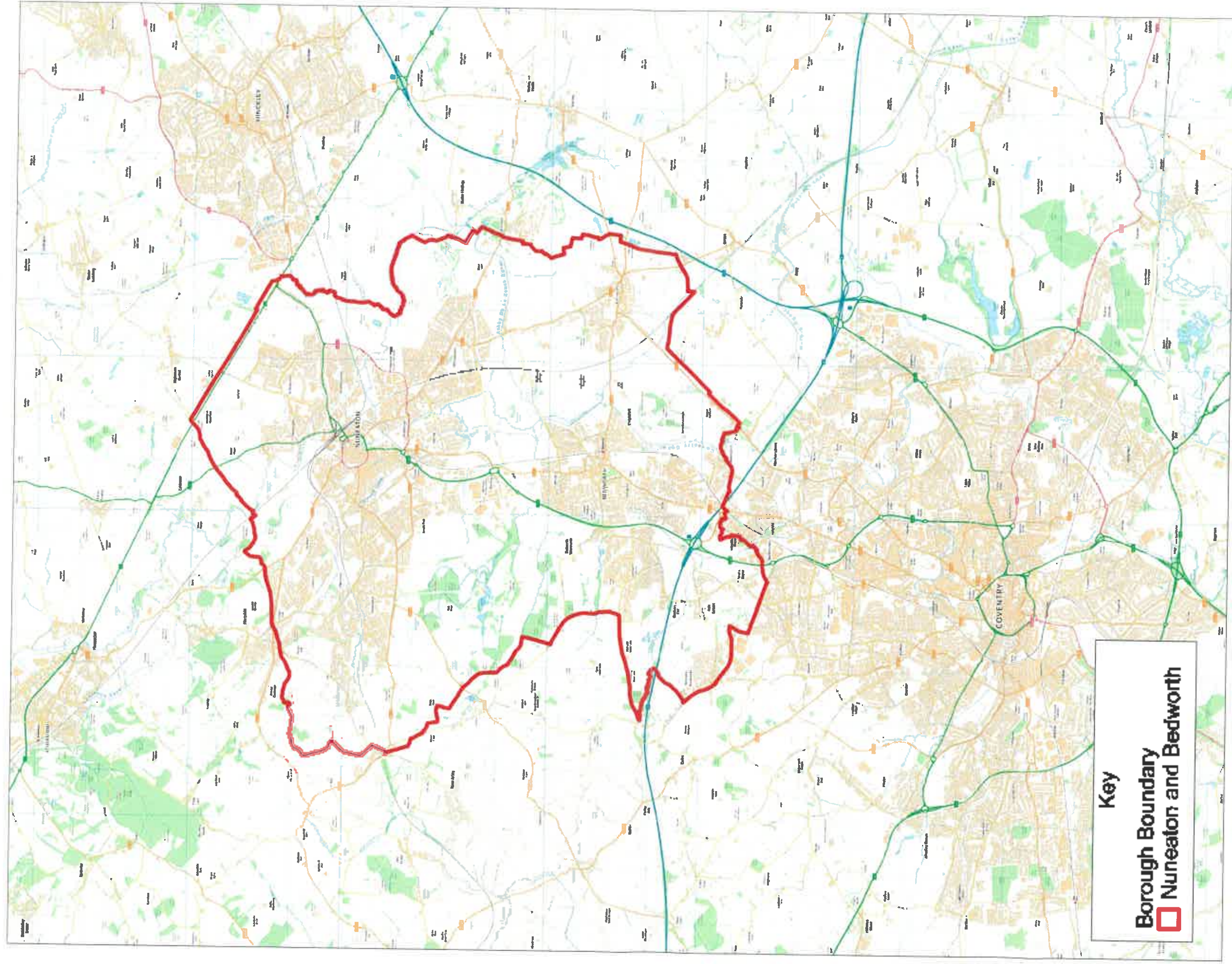
List of Defendants and their addresses

- (2) JESSICA DODD,
- (3) MICHAEL DOYLE
- (4) LUKE DELANEY
- (5) PATRICK MCGINLEY,
- (6) ALPHONSUS MCGINLEY
- (7) MICHAEL STOKES
- (8) MICHAEL STOKES
- (9) DENNIS STOKES
- (10) DENNIS STOKES (JNR)
- (11) BRIAN STOKES, 12a
- (12) JOHN MAUGHAN
- (13) TERRY MAUGHAN
- (14) TERRY MAUGHAN
- (15) PATRICK MAUGHAN
- (16) OWEN MAUGHAN
- (17) OWEN MAUGHAN
- (18) BERNARD CORCORAN
- (19) FRANCIS CORCORAN
- (20) FRANCIS MAUGHAN
- (21) MARTIN MAUGHAN
- (22) THOMAS MAUGHAN
- (23) JOHN MONGAN
- (24) MARTIN MONGAN
- (25) MARTIN MONGAN
- (26) LEONARD MONGAN
- (27) PAUL McDONAUGH
- (28) SIMON McDONAUGH
- (29) BERNARD McDONAUGH
- (30) JOHN McDONAUGH
- (31) MIKE McDONAUGH
- (32) MARTIN McDONAUGH
- (33) AARON McDONAUGH
- (34) KATHLEEN McDONAUGH
- (35) WINNIE McDONAUGH
- (36) MARTIN WARD
- (37) PAT WARD
- (38) MICHAEL WARD
- (39) KATHLEEN WARD
- (40) ROSELEEN WARD
- (41) BERNIE SWEENEY
- (42) JOHN CONNORS
- (43) TRACEY BROWN
- (44) WILLIAM BRIDGES

- (45) TOM WARD
- (46) EDDIE McDONOUGH
- (47) EDDIE (AKA EDWARD) WARD
- (48) CHRISTOPHER McDONOUGH
- (49) WILLIAM DOHERTY
- (50) GERRY O'BRIEN
- (51) ELIZABETH O'BRIEN
- (52) PEARL BLAINLEY
- (53) FIONA WARD
- (54) PERSONS UNKNOWN

SCHEDULE 2 – MAP OF THE BOROUGH

Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Not to scale

SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

SITE NUMBER	MAP SITE APPEARS ON	SITE	>5 acres	POSTCODE	Land Owner	Title Number
1 B		Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS)	x		NBBC	WK447699
2 B		Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground/Pool Bank St)	✓	CV11 5PZ	NBBC	WK448269
3 B		Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton (aka Stanley Road/Vernons Lane Recreational Ground)	✓	CV11 5ET	NBBC	WK447951/ WK240764/ WK238363
4 B		Land being car park on the south west side of Corporation Street, Nuneaton (aka Upper Abbey Street Car Park)	x	CV11 5DG	NBBC	WK448699
5 B		Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street Car Park 1 and 2)	x	CV11 5QE	NBBC	WK448585/ WK178804
6 B		Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	x	CV11 4BW	Private	WK388438
7 B		Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park)	x	CV11 5DB	NBBC	WK450184
8 B		Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park)	x	CV11 4BS	Private	WK388584
9 B		Land and buildings on the east side of Broad Street, the north side of Queen's Road and the south west side of Abbey Street (aka Abbey Street Car Park)	x	CV11 5NE	NBBC	WK251517
10 B		Land at Church Street, Nuneaton (aka Church Street Car Park)	x	CV11 4AS	NBBC	WK449878
11 B		Land and buildings lying to the East of Coton Road (aka Town Hall Car Park)	x	CV11 5AA	NBBC	WK88582
12 B		Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)	x	CV11 4AL	NBBC	WK428642
13 B		Land at Coton Road, Nuneaton (aka Riverside Car Park)	x	CV11 5AA	NBBC	WK450298
14 B		Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park)	x	CV11 5JF	NBBC	WK448678
15 B		Land to the south side of Bermuda/land lying to the east and west of Coventry Road, Chilvers Coton/land on the west side of a road leading from Coventry to Nuneaton and a balancing lake and land to the south of Bermuda Road, Nuneaton (aka Bermuda Balancing Lake)	✓		NBBC	WK448511/ WK284250/ WK345891
16 C		Recreation Ground at Easyboro Way, Nuneaton (aka Attleborough Recreational Ground)	✓	CV11 4PY	NBBC	WK449338
17 C		Land on south side of Lutterworth Road, Nuneaton (aka Pauls Land)	✓	CV11 6QA	NBBC	WK449027
18 B		Land lying to the north east of Braemer Way, Nuneaton, Land on the south west and north east sides of Greenmoor Road & Land lying to the south east side ofcroft road (aka Jubilee Sports Centre)	✓	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
19 B		Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton (aka Marsdale Drive)	✓		NBBC	WK342581/ WK355952
20 B		Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC	WK447355
21 B		Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road (aka Whittleford Park)	✓	CV10 8PY	NBBC	WK130458/ WK447033
22 E		Land on the south side of Marston Lane, Nuneaton (aka Bailey Park)	✓	CV12 8DR	NBBC	WK448180
23 E		Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓		NBBC	WK448258
24 E		Spitalfields 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the north-west side of Rye Piece Ringway, Bedworth & Zion Chapel, High Street Bedworth	x	CV12 8NF	NBBC	WK448878/ WK246825/ WK448801
25 E		Park Road (Car Park) - land on the east side of Park Road, Bedworth	x	CV12 8LH	NBBC	WK448511
26 F		Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barnacle Lane, Bulkington, Bedworth	✓		NBBC	WK448611/ WK448824(part)

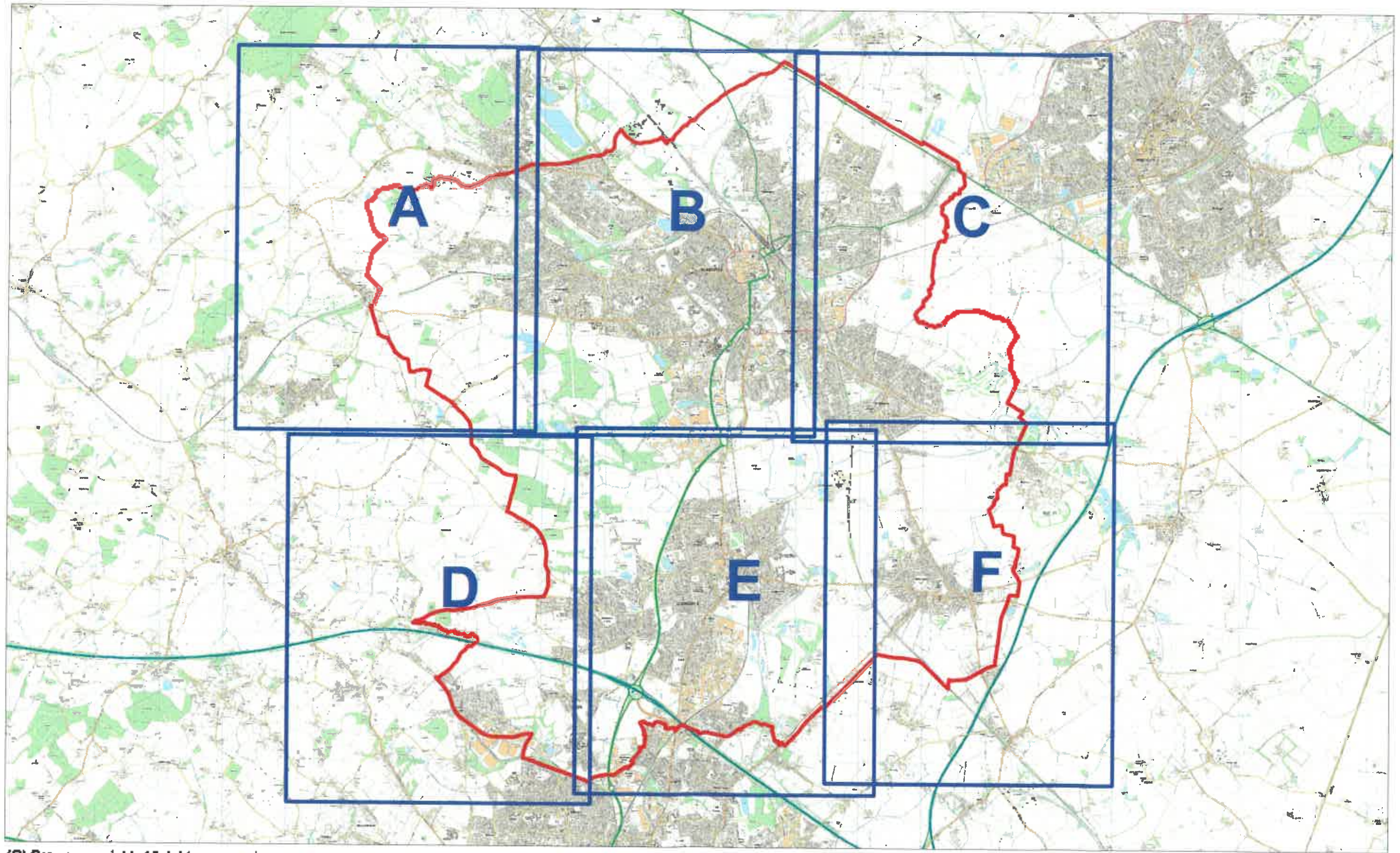
27 F	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	x	CV12 9RF	NBBC	WK448510/ WK448500
28 F	Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK448549
29 B	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK439320
30 B	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Remaden Avenue, Nuneaton (aka Stubbs Pool)	✓	CV10 9DJ	NBBC	WK448197/ WK448093
31 B	Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton (aka The Dingle)	✓	CV10 9DE	NBBC	WK373679/ WK448013
32 B	Land on the south side of Willow Road, Nuneaton	✓		NBBC	WK447731
33 D	Land on the West side of Blackberry Lane, Bedworth	✓		NBBC	WK137139
34 E	Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	✓	CV7 9EX	NBBC	WK450050
35 D	Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedworth	✓	CV7 8NG	NBBC	WK124031
36 E	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry (aka Silverstone Drive)	✓		NBBC	WK336223
37 E	St. Giles Recreational Ground - Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	x	CV7 9GZ	NBBC	WK143991/ WK154857
38 B	Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Marl.)	✓	CV10 9TD	NBBC	WK358453
39 A	Land south-east of Hickman Road, Galley Common, Nuneaton (aka Chaucer Drive)	✓	CV10 9SD	NBBC	WK339730
40 A	Nuneaton & North Works Group Riding for Disabled, Valley Road, Galley Common (CV10 9NJ) / land at Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NJ) (aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre)	x	CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
41 B/A	Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the north east side of Merlin Avenue, south east side of Freeland Rise, Whittleford and land lying to the West of Bucks Hill (aka Freeland Rise)	✓	CV10 9QF	NBBC	WK319146/ WK326554
42 B/A	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Farnham Drive/Poplar Tree Farm EA)	✓	-	NBBC	WK319145
43 A	Land on Galley Common, Nuneaton; land at Galley Common Nuneaton and Land on the south side of Plough Hill Road, Stockingford (aka North Field)	✓	CV10 9PZ	NBBC	WK238447/ WK238145/ WK324522
44 B	Land on the south side of Sherbourne Avenue, Nuneaton	x	CV10 9JH	NBBC	WK234444
45 D	Land on the south side of Cardigan Road, Bedworth (aka Anderton Road POS)	✓	CV12 0HD	NBBC	WK281821
46 E	Land and Buildings at Market End Farm and Orchard Farm, Smorrell Lane	✓	CV12 0GE	Private	WK360708
47 E	Newdigate Recreational Ground - Land at Smorrell Lane, Bedworth	✓	CV12 0JP	NBBC	WK449987
48 A	Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thornione Way)	✓	CV10 8NN	NBBC	WK32497
49 A	Kingswood Road Recreational Ground - Land on the North side of Ansley Road, Stockingford	x	CV10 9QG	NBBC	WK32497
50 B	Stockingford Recreational Ground - Land on the west side of Westbury Road, Nuneaton and land on the north east side of Grove Road, Nuneaton and land lying to the west of Nuneaton Road	✓	CV10 8JX	NBBC	WK448137/ WK448304/ WK317827
51 E	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8NW	NBBC	WK449032
52 E	Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way)	x	CV8 5TE	Private	WK394575
53 E	Land on the North side of Bulkington Road and land on the South side of Johnson Road/Alex Wilson Centre, 34 Nuneaton Road, Bedworth (CV12 8AL) and land lying to the west of Wootton Street and land at Elizabeth Centre, Johnson Road	✓	CV12 9BH	NBBC	WK169700/ WK448169/ WK250992/ WK448429
54 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBC	WK449032
55 E	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8NN	NBBC	WK449032
56 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8JT	NBBC	WK449032
57 E	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	x	CV12 8JG	NBBC	WK366034
58 E	Land at Arbury Avenue, Bedworth (aka Arbury Road POS)	x		NBBC	WK448598
59 E	Collycroft Recreational Ground - Land lying to the east of Amos Jacques Road, Collycroft, Bedworth and land to the west of Nuneaton Road/Alex Wilson Centre 34 Nuneaton Road Bedworth and land to the west of Nuneaton Road	✓		NBBC	WK295888/ WK460024/ WK448169/ WK317827
60 E	Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road)	x	CV12 0AL	NBBC	WK449846
61 C	Land lying to the north of Butternere Avenue, Nuneaton	✓	CV11 8EP	NBBC	WK210988

62	C	Land at Horselton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	x		NBBC	WK336798/ WK344807
63	C	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	x	CV11 6YB	NBBC	WK447654/ WK319282
64	C	Recreation Ground, The Long Shoot, Nuneaton, (CV11 6JH)	x	CV11 8JH	NBBC	WK446888
65	C	Land at Horselton Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Drive/Tavistock Way)	✓	CV11 6YL	NBBC	WK336798/ WK447654
66	C	Land on the east side of Changebrook Close and land on the west and east side of Pallott Drive, Nuneaton	✓	-	NBBC	WK345480/ WK309853
67	B	Land on the south side of Church Lane, Nuneaton (Cleaver Gardens/Sandon Fields)	✓	CV10 0HG	NBBC	WK448958
68	B	Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue, Nuneaton (aka Coronation Walk)	✓	CV10 0BN	NBBC	WK448096/ WK448091
69	B	Land at Bradestone Road, Nuneaton	x		NBBC	WK450498
70	B	Land on the north side of Donnithorne Avenue, Nuneaton (aka Caldwell Grange)	x		NBBC	WK452385
71	B	Land on the south side of Avenue Road, Nuneaton (aka Gale Fields)	✓		NBBC	WK452278
72	B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground)	✓		NBBC	WK448985
73	B	Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	x		NBBC	WK449842/ WK449818
74	B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton	x	CV11 5PQ	NBBC	WK447476
75	B	Land at Donnithorne Avenue, Nuneaton; land lying to the east of Raveloe Drive, Nuneaton; land on the east side of Marston Lane, Nuneaton and Land on the east and west sides of Marston Lane, Nuneaton (aka Marston Lane Fields)	✓	CV11 4RE	NBBC	WK452370/ WK452349/ WK449468/ WK449734
76	B	Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chivers Coton	✓	CV10 7BX	NBBC	WK448537/ WK344972
77	B	Riversley Park, Coton Road, Nuneaton	✓	CV11 6TY	NBBC	WK450206/ WK450173
78	B	Land at Sorrell Road, Nuneaton	✓	CV10 7AW	NBBC	WK450035
79	B	Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton	x	CV11 5TX	NBBC	WK450206/ WK450173
80	B	Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park)	✓	CV11 4LX	NBBC	WK448985
81	C	Crowhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 6XA	NBBC	WK370815
82	B	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	x	CV11 4PW	NBBC	WK310067
83	E	Land at Acacia Crescent, Bedworth	x		NBBC	WK448428
84	B	Land at Dunns Close, Nuneaton	x		NBBC	WK452330
85	E	Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry)	x		Private	WK394575
86	C	Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton	x		WCC	WK271645/ WK455358
87	E	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC	WK470015/ WK424958
88	D/E	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV7 9AH)	✓	CV7 9AH	Private	WK463626
89	E	Race Leys Infant School, Bedworth	x	CV12 8AD	WCC	Unregistered
90	E	Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)	✓	CV12 0HP	WCC	WK424335
91	E	All Saints Bedworth C of E Primary School and Nursery, Bedworth	x	CV12 8HP	WCC	Unregistered
92	F	Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth	x	CV12 9RT	WCC	WK79471
93	E	The Cannons C of E Primary School - aka Land and buildings on the South side of Derwent Road, Bedworth	✓	CV12 8RT	Private	WK225063
94	E	Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth	x	CV7 9FJ	WCC	WK33092
95	D	Keresley Newland Primary Academy and Keresley Newland School, , Grove Lane, Keresley, Coventry, (CV7 6JZ)	✓	CV7 6JZ	WCC	WK427632/ WK477207
96	D	Newdigate Primary School and Nursery - aka Land lying to the South of Smormal Lane, Goodyears End, Bedworth and Land lying to the South of smormal Lane Bedworth	✓	CV12 0HA	WCC	WK27604/ WK134659
97	D/E	Wheelwright Lane Primary School, Ash Green, Coventry	✓	CV7 9HN	WCC	WK425267
98	E	St Francis Roman Catholic School, Nicholas Street, Bedworth	x	CV12 8JN	Private	WK262596
"		Land lying to the North of Rye Piece Ringway, Bedworth			Private	WK476476

		Land on the East Side of Nicholas Street, Bedworth			WCC	WK171388
99 E		St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV7 9NS	WCC	WK171647
100 F		St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF)	✓	CV12 9PF	Private	WK461720
		Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth, CV12 9PF			Private	WK472707
101 E		St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9DA)	✓	CV12 9DA	Private	WK479304
102 B		Land adjoining St Thomas More Catholic School and Sixth Form College, Greenmoor Road, Nuneaton, CV10 7EX	✓	CV10 7EX	Private	WK478035
		St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX			Private	WK477630
		Arbury High School, Greenmoor Road, Nuneaton			Private	WK233418
103 B		Abbey Col E Infant School, Nuneaton	x	CV11 5EL	WCC	Unregistered
104 B		All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)	x	CV10 7AT	Private	WK461748
105 B		Camp Hill Primary School, aka Land to the South of Tuttle Hill, Camp Hill, Nuneaton	✓	CV10 9QA	WCC	WK409218
106 C		Chatwynd Junior School, aka Land lying to the South of Gipsy Lane, Nuneaton	✓	CV11 4SE	WCC	WK170501
107 B		Land at Judkins Quarry Tuttle Hill, Nuneaton (aka Recycling Centre)	✓	CV10 0HU	WCC	WK393091
108 B		Chilvers Coton Community Infant School, Frank Street, Nuneaton (CV11 5RB)	x	CV11 5RB	WCC	WK424955
109 B		Croft Junior School, aka Land lying to the west of Northumberland Avenue, Nuneaton	✓	CV10 8ER	WCC	WK239413
110 B		Galley Common Infant School, Nuneaton	x	CV10 8NZ	WCC	Unregistered
111 C		Milby Primary School, aka Land lying to the East of Higham Lane, Nuneaton	✓	CV11 6JS	WCC	WK205172
112 B		Glendale Infant School, aka Land on the south side of Skye Close, Nuneaton	x	CV10 7LW	WCC	WK178493
113 B		Middlemarch School, Nuneaton	✓	CV10 7BQ	WCC	Unregistered
114 B		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	x	CV10 8HW	WCC	WK426673
		Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
115 B		Our Lady of the Angels Infant School and St Josephs RC First School at Coton Road, Nuneaton	x	CV11 5TY	Private	WK226511
		Our Lady of the Angels Infant School and St Josephs RC First School, Coton Road, Nuneaton, CV11 5TY			Private	WK477543
116 A		Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton	✓	CV10 8NL	Private	WK470637
		Land on the North Side of Ansley Road, Nuneaton			Private	WK189735
117 B		Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR			Private	WK471379
118 B		St Pauls C of E Primary School, Nuneaton	x	CV10 8NH		Unregistered
119 B		Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	x	CV10 0JX	Private	WK480568
		St. Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX			Private	WK449953
120 B		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	x	CV11 4QH	Private	WK468047
		Oakwood Secondary School, Morris Drive, Nuneaton			Private	WK468048
		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH			WCC	WK233776
121 C		Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 6HJ	x	CV11 6HJ	WCC	WK473130
		Land on the East Side of Windemere Avenue, Nuneaton			Private	WK131856
		St Nicolas C of E First School, Windemere Avenue, Nuneaton, CV11 6HJ			Private	WK473119
122 B		Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton	✓	CV10 0DR	WCC	WK149023/WK216447
123 B		Land at George Elliot School, Raveloe Drive, Nuneaton, CV11 4QP	✓	CV11 4QP	Private	WK458956
124 B		Wambrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton	✓	CV11 4LU	NBBC	WK448965
125 B		Etona College, Leicester Road, Nuneaton, CV11 6AA	✓	CV11 6AA	WCC	WK425515
126 B		Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	✓	CV10 0BJ	Private	WK465311
127 B		Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓	CV11 4QH	WCC	WK468047/WK468048/WK233776
128 B		The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Rad	✓	CV10 7PD	WCC	WK175243/WK425489
129 C		North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓	CV11 6BH	Private	WK428595

130	B	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓	CV11 4BE	Private	WK497842/WK497832
131	E	Bedworth Heath Nursery School, Globe Avenue, Bedworth, CV12 0DP	x	CV12 0DP	WCC	WK426282
132	D	Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
"		Exhall Grange Special School, Wheelwright Lane, Coventry			Private	WK440475
"		Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 8HP	✓	CV7 8HP	Private	WK450903
133	E	Quest Academy, North Side of Griff Lane, Nuneaton	✓	CV10 7SD	WCC	WK365844
134	E	Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton	x	CV12 8AG	WCC	WK240628
"		Race Leys Middle School, Barton Road, Bedworth, CV12 8HG		CV12 8HG	Private	WK465841
135	B	Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
"		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 8JY	WCC	WK42667
136	C	Whitstone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton	x	CV11 4SQ	WCC	WK23140
137	B	Attleborough Mills, Attleborough Road, Nuneaton (aka Holman Way)	x		Private	WK256088
138	B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton	x	CV11 6SS	Private	WK430022
139	B	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓	CV10 7SD	Private	WK447390
140	B	Halfords - land and buildings on the south side of Newtown Road, Nuneaton	x	CV11 5UT	Private	WK390614
141	B	Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre)	✓	CV10 7HU	Private	WK474729

Key for traveller encampment maps



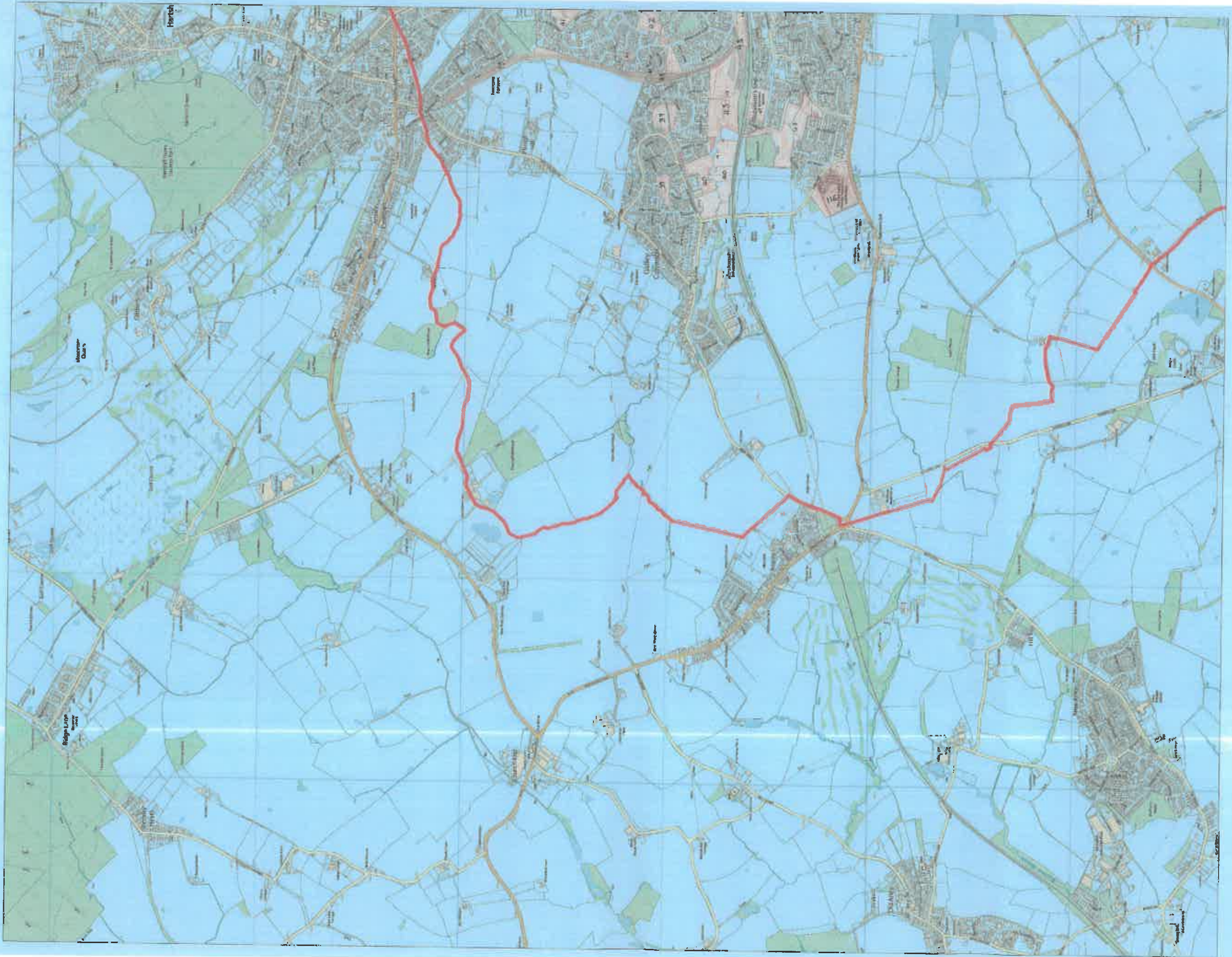
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Nuneaton and Bedworth Borough Council LA 100018416 2018/19

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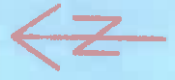
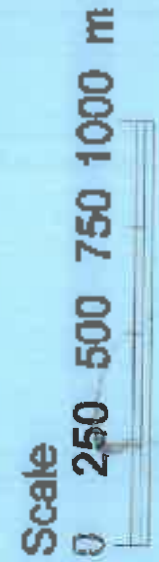


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Northwest Nuneaton



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100018416 2018/19

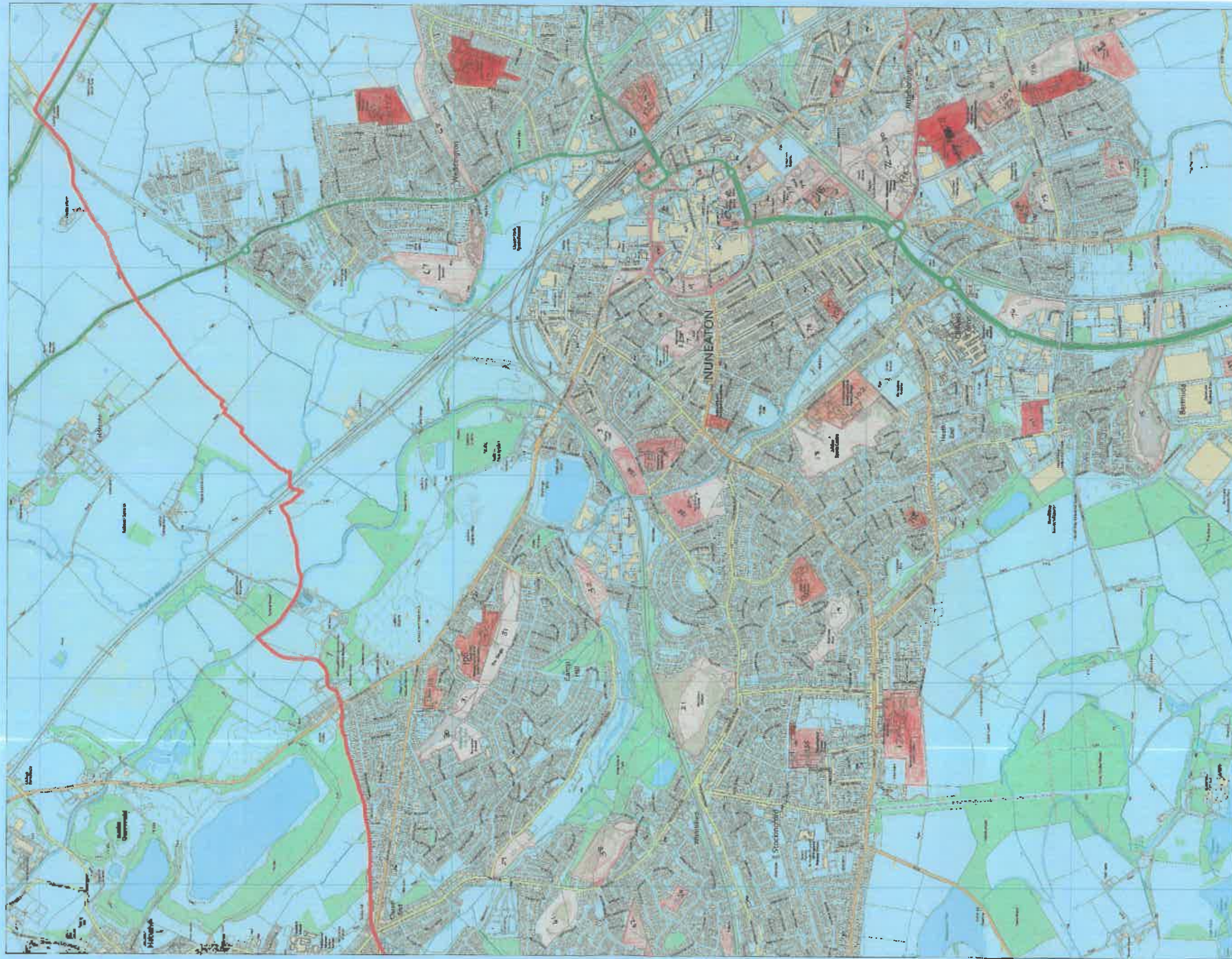




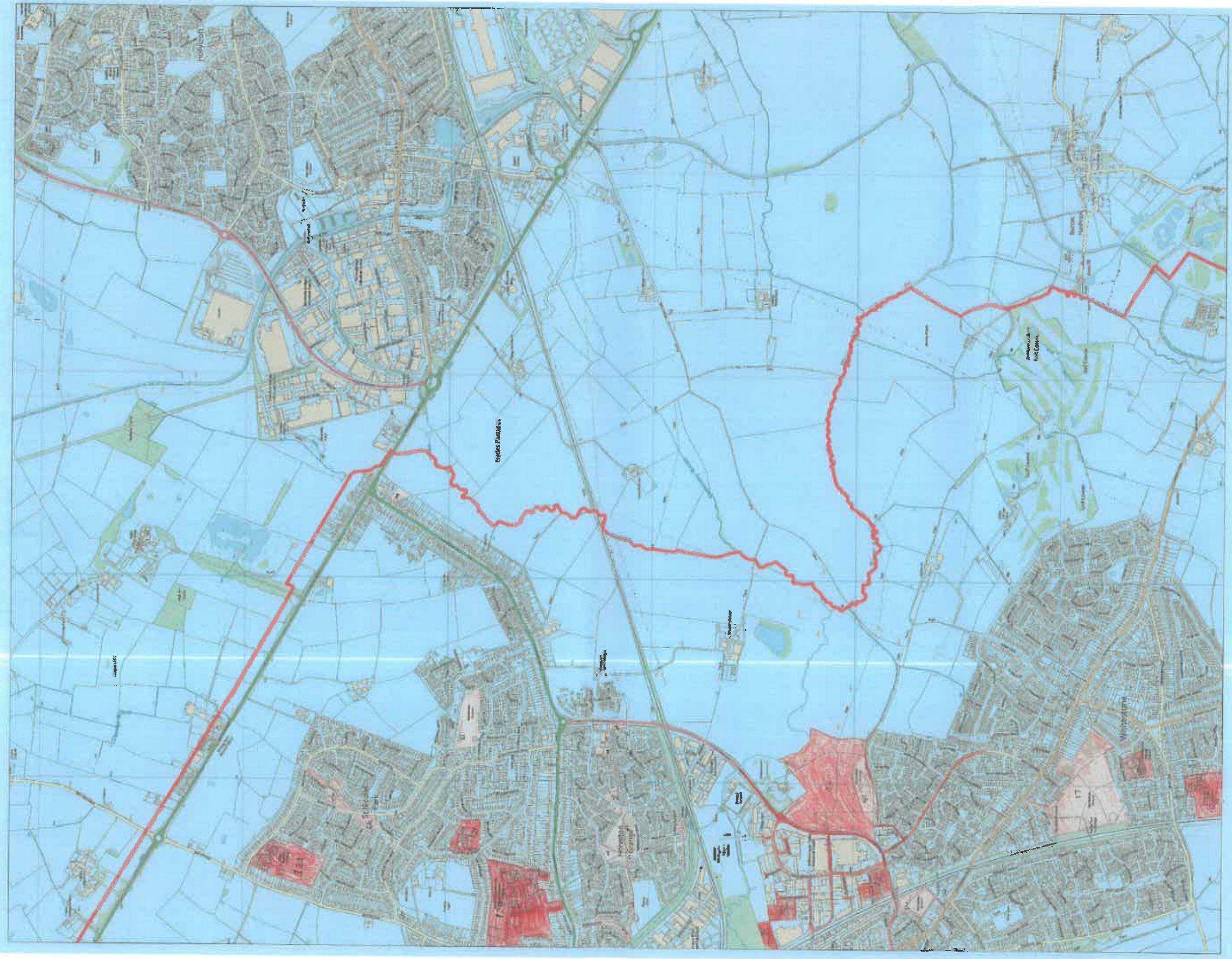
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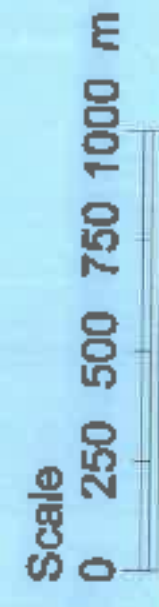
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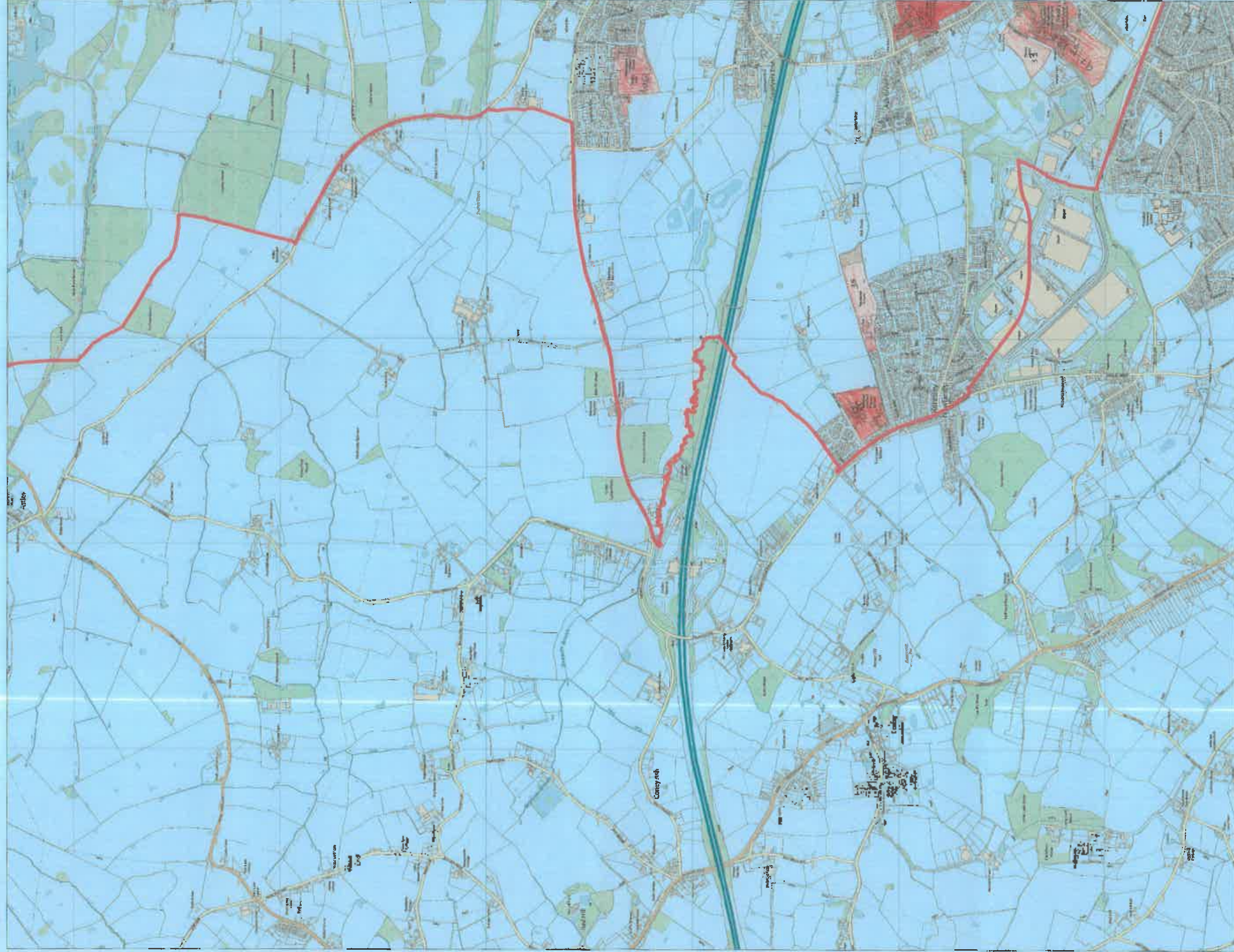


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100018416 2018/19





Southwest Bedworth



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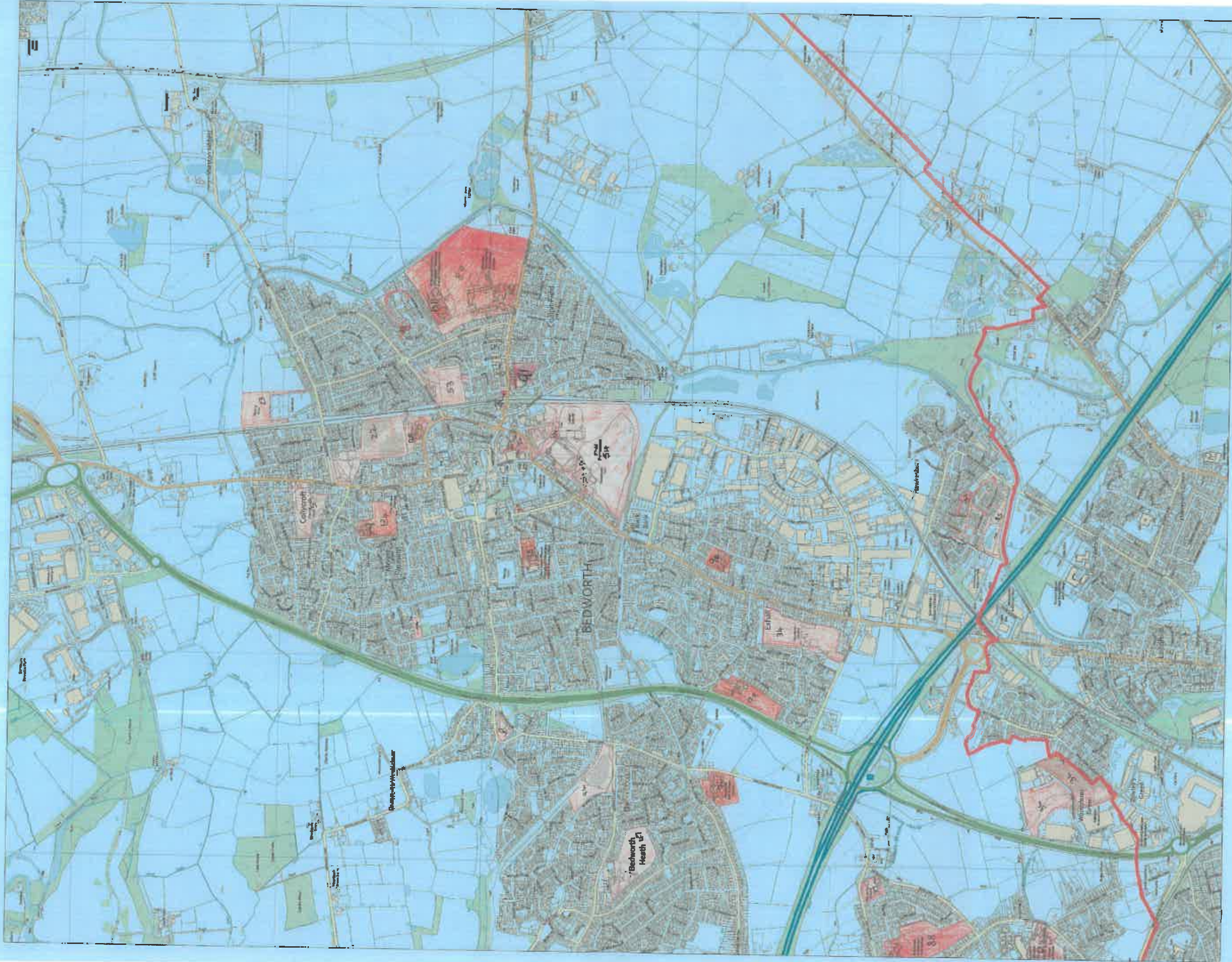


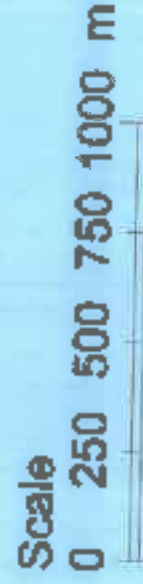
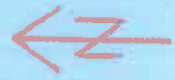
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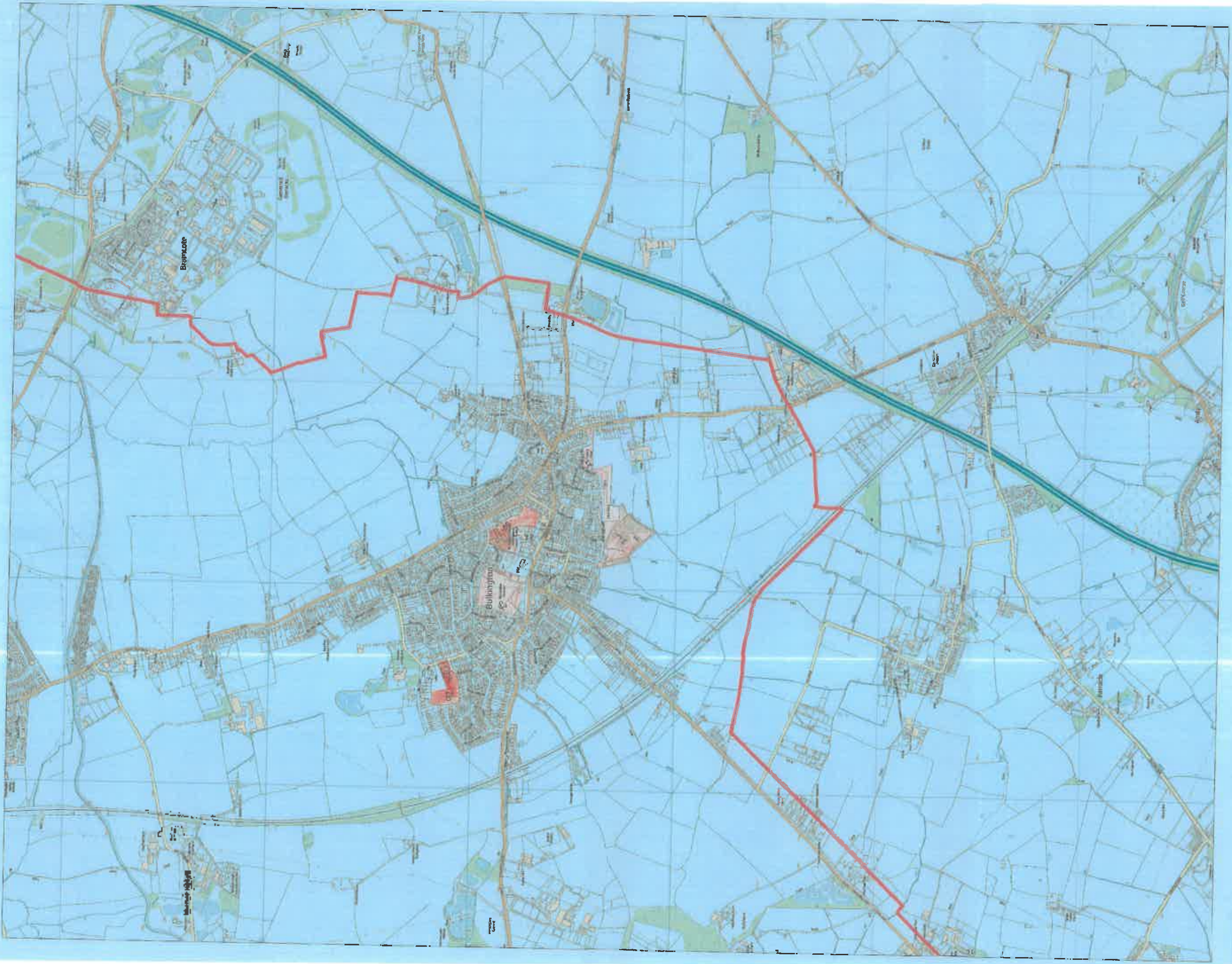
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South of Bedworth





Southeast Bedworth



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100018416 2018/19

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Aaron McDonaugh
9 Sandiacre
Long Green
Cressing
Baintree
CM77 8DL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr McDonaugh,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your previous address 9 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19 & AS 19

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second

Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Aaron McDonaugh

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Alphonso McGinley
7 Sandiacre, Long Green
Cressing
Baintree
Essex
CM77 8DL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr A McGinley,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 7 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

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Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Alphonso McGinley

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Bernard McDonaugh
37 Boathorse Road
Stoke-on-Trent
ST7 4JA

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr McDonaugh,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 37 Boathorse Road, Stoke-on-Trent ST7 4JA by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 7.45a.m. The deemed date of service of the Claim Form is 13/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 03/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton. Threats of violence, attempted theft, abusive behaviour to restaurant staff and entering a secure area of the leisure centre and refusing to leave when asked to do so.	21st June 2018 to 4th July 2018	Carol Ingleston – page 1204 – 1205 (34) Sgt Scruton – page 1326/7 para 5.20 & AS20

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

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1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Bernard McDonaugh

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Bernie Sweeney
11 Kanes Hill Caravan Park
Botley Road
Southampton
SO19 0SA

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Sweeney,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 11 Kanes Hill Caravan Park, Botley Road, Southampton SO19 0SA by personally delivering and leaving for your attention a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 11.20a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed by way of service a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment at Kersley Community Centre, Howat Road, Kersley Forced entry onto land, driving over the football pitch and causing damage to it, threats to kill towards members of the public walking their dogs and towards a young boy aged 8	27 th July 2018 to 1 st August 2018	Carol Ingleston – page 1206 – 1207 (35) Sgt Scruton page 1326 – para 5.18 & AS18

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.

3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Bernie Sweeney

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Brian Stokes
12a Orchard Drive
Smithy Fen
Cottenham
Cambridgeshire
CB24 8PT

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Stokes,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 12a Orchard Drive, Smithy Fen, Cottenham, Cambridgeshire CB24 8PT by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 9.45a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8 Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes,

storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Brian Stokes

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Dennis Stokes (JNR)
Caravan 6
Dun Roamin Park
Whitfield
NN13 5TD

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr D Stokes (JNR),

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address Caravan 6, Dun Roamin Park, Whitfield NN13 5TD by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 2.10p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8 Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
2	Unauthorised encampment at Arbury Avenue, Bedworth	3 rd October 2018 to 10 th October 2018	Sgt Scruton – page 1335 – para 5.50 & AS 50
3	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	8 th January 2019 to 14 th January 2019	Philip Richardson – Page 73, para 57, Page 1104 Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43) Sgt Scruton, page 1322, para 5.2 & AS 2
4	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	14 th January 2019 to 24 th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96 Carol Ingleston – para 39, page 1112-para 37, pages 1230-1234 (44), pages 1272-1279 (CI10) Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW! And 1314 -RW2

			Sgt Scruton page 1321, para 5.1
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3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Dennis Stokes (JNR)

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Dennis Stokes
Plot 6 Kirby Glebe Farm
Hartshill
Nuneaton
CV10 0TB

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Stokes,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your previous address 12 Bashley Road Caravan Site, Bashley Road, London NW10 6TH by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 08/03/2019 at 2.03p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8, page 1208(36) Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
2	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	8th January 2019 to 14th January 2019	Philip Richardson – Page 73, para 57, Page 1104 Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43) Sgt Scruton, page 1322, para 5.2 & AS 2
3	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	14th January 2019 to 24th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96 Carol Ingleston – para 39, page 1112-para 37, pages 1230-1234 (44), pages 1272-1279 (CI10) Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW1 And 1314 -RW2 Sgt Scruton page 1321, para 5.1

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3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

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4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

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5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

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113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Dennis Stokes

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Francis Maughan
14 Sandiacre
Long Green
Cressing
Baintree
Essex
CM77 8DL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Maughan,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 14 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8, pages 1208-1210 (36) Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
2	Encamping on land at the Jubilee Centre, Nuneaton. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	15 th August 2018 to 25 th August 2018	Philip Richardson – Exhibit PR9 – pages 1048-1049 Carol Ingleston – Page 1108 – para 9, pages 1214-1216(38) Sgt Scruton – page 1325-para 5.16 & AS 16
3	Unauthorised encampment at Donnithorne Avenue, Nuneaton	7 th September 2018	Carol Ingleston – page 1217-1218 – (39)
4	Unauthorised encampment at Vernon’s Lane, Nuneaton. Forcing entry onto land using an angle grinder to break the barrier and block access to the field	13 th September 2018 to 14 th September 2018	Sgt Scruton – page 1323 para 5.11 & AS 11
5	Causing damage to barrier on land and unauthorised encampment at the Pingles Leisure centre Carpark, Avenue Road, Nuneaton	6 th October 2018 to 15 th October 2018	Philip Richardson – page 1104 Carol Ingleston – Page 1222-1224 (41) Sgt Scruton, page 1323, para 5.10 & AS 10.
6	Causing damage to hedge on land by driving through to form an	8 th January 2019 to 14 th January 2019	Philip Richardson – Page 73, para 57,

	<p>unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre.</p> <p>Leaving human excrement, used toilet paper, bagged refuse and litter on the land.</p>		<p>Page 1104</p> <p>Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43)</p> <p>Sgt Scruton, page 1322, para 5.2 & AS 2</p>
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3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders

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5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

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Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Francis Maughan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

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Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mrs Jessica Dodd
Plot10 Kirby Glebe Farm
Hartshill
Nuneaton
CV10 0TB

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mrs Dodd,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

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1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment at Gala Fields, Avenue Road, Nuneaton	1 st October 2016 to 3 rd October 2016	Sgt Scruton – page 1335 – para 5.50 & ‘AS 50’
2	Unauthorised encampment at Arbury Avenue, Bedworth	3 rd October 2016 to 10 th October 2016	Sgt Scruton – Page 1335 – para 5.50 & ‘AS 50’
3	Breaking lock on gates to gain access and forming unauthorised encampment at Vernons Lane, Nuneaton. Leaving litter, human excrement, used toilet paper and other litter in the bushes and dismantling fence to neighbouring land to gain access to it. Causing disruption to the school activities and school closure.	3 rd June 2018 to 6 th June 2018	Matthew Pike – pages 991-992 Carol Ingleston – page 1107/8 – para 7 Martyn Stephens – page 1282 – para 9 Sgt Scruton – page 1327 – para 5.22 & ‘AS 22’
4	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19
5	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8 Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
6	Encamping on land at the Jubilee Centre, Nuneaton. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	15 th August 2018 to 25 th August 2018	Philip Richardson – Exhibit PR9 – pages 1048-1049 Carol Ingleston – Page 1108 – para 9

			Sgt Scruton – page 1325-para 5.16 & AS 16
7	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	<p>Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104</p> <p>Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3</p> <p>Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9)</p> <p>Sgt Scruton page 1324/1325, para 5.15 & AS 15.</p>
8	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton in breach of licence agreement by allowing more than 12 caravans onto the land and causing a nuisance	25 th September 2018 to 6 th October 2018	<p>Philip Richardson – page 72 – para 52 & 53, Pages 1046d – 1046e</p> <p>Carol Ingleston – page 1111 – para 27 – 30</p>
9	Causing damage to barrier on land and unauthorised encampment at the Pingles Leisure centre Carpark, Avenue Road, Nuneaton	6 th October 2018 to 15 th October 2018	<p>Philip Richardson – page 1104</p> <p>Sgt Scruton, page 1323, para 5.10 & AS 10.</p>
10	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	8 th January 2019 to 14 th January 2019	<p>Philip Richardson – Page 73, para 57, Page 1104</p> <p>Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43)</p> <p>Sgt Scruton, page 1322, para 5.2 & AS 2</p>
11	Unauthorised encampment on the	14 th January 2019	Philip Richardson

	Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	24 th January 2019	<p>page 73, para 60 & page 75 para 73, page 81-para 96</p> <p>Carol Ingleston – para 39, page 1112-para 37, pages 1230-1234 (44), pages 1272-1279 (CI10)</p> <p>Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW! And 1314 -RW2</p> <p>Sgt Scruton page 1321, para 5.1</p>
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storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

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Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Jessica Dodd

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

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I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr John Connors
2 Costalot Stables
Heath Road
Leicestershire
LE67 1DG

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Connors,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

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2	Unauthorised encampment at Donnithorne Avenue, Nuneaton	7th September 2018	Carol Ingleston – page 1217-1218 – (39)
3	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton in breach of licence agreement by allowing more than 12 caravans onto the land and causing a nuisance	25th September 2018 to 6th October 2018	Philip Richardson – page 72 – para 52 & 53, Pages 1046d – 1046e Carol Ingleston – page 1111 – para 27 – 30(40)
4	Causing damage to barrier on land and unauthorised encampment at the Pingles Leisure centre Carpark, Avenue Road, Nuneaton	6th October 2018 to 15th October 2018	Philip Richardson – page 1104 Carol Ingleston – Page 1222-1224 (41) Sgt Scruton, page 1323, para 5.10 & AS 10.

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the

documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making

against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: John Connors

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr John Maughan
14 Sandiacre, Long Green
Cressing
Baintree
Essex
CM77 8DL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Maughan,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 14 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment at Tiverton Drive, Nuneaton	4 th August 2016	Carol Ingleston – page 1152
2	Unauthorised encampment at Slingsby Close, Attleborough Industrial Estate, Nuneaton	6 th July 2017 to 9 th July 2017	Sgt Scruton – page 1331 – para 5.36 7 page 1665-1669 - AS 36
3	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104 Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3 Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9) Sgt Scruton page 1324/1325, para 5.15 & AS 15.
4	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	14 th January 2019 24 th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96 Carol Ingleston – para 39, page 1112-para 37, pages 1230-1234 (44), pages 1272-1279 (CI10) Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW! And 1314 -RW2 Sgt Scruton page 1321, para 5.1

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: John Maughan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr John McDonaugh
Caravan 7
Dun Roamin Park
Brackley
Northants
NN13 5TD

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr McDonaugh,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address Caravan 1, Dun Roamin Park, Whitfield, Brackley, Northants NN13 5TD by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 2.10p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton. Threats of violence, attempted theft, abusive behaviour to restaurant staff and entering a secure area of the leisure centre and refusing to leave when asked to do so.	21st June 2018 to 4th July 2018	Carol Ingleston – page 1204 – 1205 (34) Sgt Scruton – page 1326/7 para 5.20 & AS20

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

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5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

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Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: John McDonaugh

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

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Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr John Mongan
1 Gapton Hall Road
Great Yarmouth
Norfolk
NR31 0NL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Mongan,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 1 Gapton Hall Road, Great Yarmouth, Norfolk NR31 0NL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 11.25a.m. The deemed date of service of the Claim Form is 13/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 03/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104 Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3 Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9) Sgt Scruton page 1324/1325, para 5.15 & AS 15.

3. The Evidence relied upon

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3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
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5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

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Advice and assistance may also be available from:
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113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: John Mongan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mrs Kathleen Ward
2 Imari Park
38 Russell Street
Derby
DE24 8AL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mrs Ward,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 2 Imari Park, 38 Russell Street, Derby DE24 8AL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 9.09a.m. The deemed date of service of the Claim Form is 13/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 03/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment at Vernon's Lane, Nuneaton. Forcing entry onto land using an angle grinder to break the barrier and block access to the field	13th September 2018 to 14th September 2018	Sgt Scruton – page 1323 para 5.11 & AS 11

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders

regulating the use of car parks or with the express permission from the owner of the land.

5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Kathleen Ward

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Leonard Mongan
8 Pendles Paddock
Marlow Road
Stokenchurch,
High Wycombe
Buckinghamshire
HP14 3UW

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Mongan,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 8 Pendles Paddock, Marlow Road, Stokenchurch, High Wycombe, Bucks, HP14 3UW by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 08/03/2019 at 16.07p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19 & AS 19

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second

Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

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Advice and assistance may also be available from:

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Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Leonard Mongan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Luke Delaney
Kirby Glebe Farm
Hartshill
Nuneaton
CV10 0TB

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Delaney,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your previous address 12 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19
2	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104 Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3 Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9) Sgt Scruton page 1324/1325, para 5.15 & AS 15.
3	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	8 th January 2019 to 14 th January 2019	Philip Richardson – Page 73, para 57, Page 1104 Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43) Sgt Scruton, page 1322, para 5.2 & AS 2
4	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing	14 th January 2019 to 24 th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96

	<p>damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.</p>		<p>Carol Ingleston – para 39, page 1112-para 37, pages 1230-1234 (44), pages 1272-1279 (CI10)</p> <p>Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW! And 1314 -RW2</p> <p>Sgt Scruton page 1321, para 5.1</p>
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3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second

Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

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Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Luke Delaney

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Martin Maughan
81 Constitution Road
Chatham
Kent
ME5 7DN

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Maughan,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 81 Constitution Road, Chatham, Kent ME5 7DN by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 7.05a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

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2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19 & AS 19

3. The Evidence relied upon

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4. The Final Hearing

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4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

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Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

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5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

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Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Martin Maughan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Martin McDonaugh
29 Sepyside Court
Orton
Southgate
Peterborough
PE2 6SN

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr McDonaugh,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 29 Sepyside Court, Orton, Southgate, Peterborough PE2 6SN by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 10.47a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton. Threats of violence, attempted theft, abusive behaviour to restaurant staff and entering a secure area of the leisure centre and refusing to leave when asked to do so.	21st June 2018 to 4th July 2018	Carol Ingleston – page 1204 – 1205 (34) Sgt Scruton – page 1326/7 para 5.20 & AS20

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Martin McDonaugh

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Martin Mongan
9 Limehouses
Boathorse Road
Stoke-on-Trent
Staffordshire
ST6 4QQ

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Mongan,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 9 Limehouses, Boathorse Road, Stoke-on-Trent, Staffordshire ST6 4QQ by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 7.40a.m. The deemed date of service of the Claim Form is 13/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 03/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19 & AS 19
2	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104 Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3 Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9) Sgt Scruton page 1324/1325, para 5.15 & AS 15.

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any

evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,

Community Base,

113 Queens Road,

Brighton, East Sussex, BN1 3XG

Tel: 01273 234 777

email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh

Legal Services Manager

Name of Defendant: Martin Mongan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Michael Doyle
6 Sandiacre, Long Green
Cressing
Baintree
Essex
CM77 8DL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Doyle,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your last known address 6 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts:

	Description	Date	Witness Statement ref
1	Unauthorised encampment on the Craft Centre Field, Avenue Road, Nuneaton	20 th October 2015	Carol Ingleston – page 1141 – CI 2
2	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8 Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
3	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	8 th January 2019 to 14 th January 2019	Philip Richardson – Page 73, para 57, Page 1104 Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43) Sgt Scruton, page 1322, para 5.2 & AS 2
4	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	14 th January 2019 to 24 th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96 Carol Ingleston – para 39, page 1112-para 37, pages 1230-1234 (44), pages 1272-1279 (CI10) Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW! And 1314 -RW2 Sgt Scruton page

			1321, para 5.1
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3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

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Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Michael Doyle

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Michael Stokes
6 Horsedean Travellers Site
Braypool Lane
Patcham
Brighton
East Sussex
BN1 8PP

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr M Stokes,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 6 Horsedean Travellers Site, Braypool Lane, Patcham, Brighton East Sussex BN1 8PP by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 08/03/2019 at 7.55p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment on land at Vernon's Lane, Nuneaton. Forcing entry onto the land using angle grinders to break the barrier and block access to the field	13 th September 2018 to 14 th September 2018	Sgt Scruton – page 1323-para 5.11 & AS11

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.

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The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

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You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Michael Stokes

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Michael Stokes
29 Oaktree Field Caravan Site
Odstock Road
Salisbury
Wiltshire
SP2 8BY

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Stokes,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your previous address 29 Oaktree Field Caravan Site, Odstock Road, Salisbury, Wiltshire SP2 8BY by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 08/03/2019 at 5.55p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment on the Craft Centre Field, Avenue Road, Nuneaton	20 th October 2015	Carol Ingleston – page 1141
2	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8 Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
3	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104 Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3 Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9) Sgt Scruton page 1324/1325, para 5.15 & AS 15.
4	Unauthorised encampment at Vernon’s Lane Nuneaton. Forcing entry onto land using angle grinders to break the barrier and blocking access to the field.	13 th September 2018 to 14 th September 2018	Sgt Scruton – page 1323-para 5.11 & AS11
5	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre.	8 th January 2019 to 14 th January 2019	Philip Richardson – Page 73, para 57, Page 1104 Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43)

	Leaving human excrement, used toilet paper, bagged refuse and litter on the land.		Sgt Scruton, page 1322, para 5.2 & AS 2
6	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	14 th January 2019 24 th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96 Carol Ingleston – para 39, page 1112-para 37, pages 1230-1234 (44), pages 1272-1279 (CI10) Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW! And 1314 -RW2 Sgt Scruton page 1321, para 5.1

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land

2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:
Friends, Families and Travellers,

Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Mr Michael Stokes

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Michael Ward
Splashes
Castle Acre Road
Swaffham
Norfolk
PE37 7XE

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Ward,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address Splashes, Castle Acre Road, Swaffham, Norfolk PE37 7XE by taping to the communal letterbox a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 12.35p.m. The deemed date of service of the Claim Form is 13/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 03/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104 Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3 Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9) Sgt Scruton page 1324/1325, para 5.15 & AS 15.

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.

3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
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4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

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You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777

email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Michael Ward

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Mike McDonaugh
62 De Lacy Street
Ashton-on-Ribble
Preston
Lancashire
PR2 2DD

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr McDonaugh,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 62 De Lacy Street, Ashton-on-Ribble, Preston, Lancashire PR2 2DD by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 11.12a.m. The deemed date of service of the Claim Form is 13/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 03/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton. Threats of violence, attempted theft, abusive behaviour to restaurant staff and entering a secure area of the leisure centre and refusing to leave when asked to do so.	21st June 2018 to 4th July 2018	Carol Ingleston – page 1204 – 1205 (34) Sgt Scruton – page 1326/7 para 5.20 & AS20

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

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4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

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Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Mike McDonaugh

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

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Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Owen Maughan
8 Imari Park
38 Russell Street
Derby
DE24 8AL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Maughan,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

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1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 8 Imari Park, 38 Russell Street, Derby DE24 8AL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 9.09a.m. The deemed date of service of the Claim Form is 13/03/2019.

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1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19 & AS 19

3. The Evidence relied upon

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Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Owen Maughan

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Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Owen Maughan
7 Sandiacre, Long Green
Cressing
Baintree
Essex
CM77 8DL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Maughan,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your previous address 7 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment at Vernon's Lane, Nuneaton. Forcing entry onto land using an angle grinder to break the barrier and block access to the field	13 th September 2018 to 14 th September 2018	Sgt Scruton – page 1323 para 5.11 & AS 11
2	Unauthorised encampment on land at Gala Fields and Car park, Avenue Road, Nuneaton	28 th September 2018	Carol Ingleston – page 1219-1221 (40)
3	Causing damage to barrier on land and unauthorised encampment at the Pingles Leisure centre Carpark, Avenue Road, Nuneaton	6 th October 2018 to 15 th October 2018	Philip Richardson – page 1104 Carol Ingleston – Page 1222-1224 (41) Sgt Scruton, page 1323, para 5.10 & AS 10.
4	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	8 th January 2019 to 14 th January 2019	Philip Richardson – Page 73, para 57, Page 1104 Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43) Sgt Scruton, page 1322, para 5.2 & AS 2
5	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	14 th January 2019 to 24 th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96 Carol Ingleston – para 39, page 1112- para 37, pages 1230-1234 (44), pages 1272-1279 (CI10) Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW!

			And 1314 -RW2 Sgt Scruton page 1321, para 5.1
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3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Owen Maughan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

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Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Patrick Maughan
12 Bashley Road Caravan Site
Bashley Road
London
NW10 6TH

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Maughan,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 12 Bashley Road Caravan Site, Bashley Road, London NW10 6TH by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 08/03/2019 at 2.03p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8 Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
2	Unauthorised encampment at Donnithorne Avenue, Nuneaton	7 th September 2018	Carol Ingleston – page 1217-1218 – (39)
3	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton in breach of licence agreement by allowing more than 12 caravans onto the land and causing a nuisance	25 th September 2018 to 6 th October 2018	Philip Richardson – page 72 – para 52 & 53, Pages 1046d – 1046e Carol Ingleston – page 1111 – para 27 – 30(40)
4	Causing damage to barrier on land and unauthorised encampment at the Pingles Leisure centre Carpark, Avenue Road, Nuneaton	6 th October 2018 to 15 th October 2018	Philip Richardson – page 1104 Carol Ingleston – Page 1222-1224 (41) Sgt Scruton, page 1323, para 5.10 & AS 10.
5	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	8 th January 2019 to 14 th January 2019	Philip Richardson – Page 73, para 57, Page 1104 Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43) Sgt Scruton, page 1322, para 5.2 & AS 2

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3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

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4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
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5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

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Tel: 01273 234 777
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Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Patrick Maughan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

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I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR – DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Patrick McGinley
Barn Fisheries
Kirby Glebe Farm
Hartshill
Nuneaton
CV10 0TB

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr McGinley,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your previous address 7 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

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1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8 Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
2	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104 Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3 Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9) Sgt Scruton page 1324/1325, para 5.15 & AS 15.
3	Unauthorised encampment at Donnithorne Avenue, Nuneaton	7th September 2018	Carol Ingleston – page 1217-1218 – (39)
4	Unauthorised encampment at Coventry Road, Nuneaton. Digging and removing earth mound to gain entry onto land	20 th November 2018	Sgt Scruton – page 1323-para 5.7
5	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	14 th January 2019 to 24 th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96 Carol Ingleston – para 39, page 1112-para 37, pages 1230-1234 (44),

			<p>pages 1272-1279 (CI10)</p> <p>Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW! And 1314 -RW2</p> <p>Sgt Scruton page 1321, para 5.1</p>
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3. The Evidence relied upon

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4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

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3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
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Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Patrick McGinley

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

X424-409B/00352023

[page]

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Paul McDonaugh
9 Russel Street
Derby
DE24 8AL

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr McDonaugh,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 9 Russel Street, Derby DE24 8AL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 9.09a.m. The deemed date of service of the Claim Form is 13/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 03/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment at Kersley Community Centre, Howat Road, Kersley. Forced entry, aggressive and abusive behaviour towards community centre staff	19 th May 2017	Sgt Scruton – page 1332 para 5.39 & AS39
2	Unauthorised encampment at Elliot Park, Burlington Way, Nuneaton. Forced entry and damage to concrete bollards	18 th June 2017 to 19 th June 2017	Sgt Scruton – page 1332 para 5.38 & AS 38
3	Breaking lock on gates to gain access and forming unauthorised encampment at Vernons Lane, Nuneaton. Leaving litter, human excrement, used toilet paper and other litter in the bushes and dismantling fence to neighbouring land to gain access to it. Causing disruption to the school activities and school closure.	3 rd June 2018 to 6 th June 2018	Matthew Pike – pages 991-992 Carol Ingleston – page 1107/8 – para 7 Martyn Stephens – page 1282 – para 9 Sgt Scruton – page 1327 – para 5.22 & ‘AS 22’
4	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton. Threats of violence, attempted theft, abusive behaviour to restaurant staff and entering a secure area of the leisure centre and refusing to leave when asked to do so.	21 st June 2018 to 4 th July 2018	Sgt Scruton – page 1326/7 para 5.20 & AS20
5	Unauthorised encampment at Vernon’s Lane, Nuneaton. Forcing entry onto land using an angle grinder to break the barrier and block access to the field	13 th September 2018 to 14 th September 2018	Sgt Scruton – page 1323 para 5.11 & AS 11

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

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You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

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113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Paul McDonaugh

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Terry Maughan
70 Exton Avenue,
Luton
Bedfordshire
LU2 0LJ

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr T Maughan,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 70 Exton Avenue, Luton Bedfordshire, LU2 0LJ by personally handing to you a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 3.20p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8, page 1208 (36) Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
2	Encamping on land at the Jubilee Centre, Nuneaton. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	15 th August 2018 to 25 th August 2018	Philip Richardson – Exhibit PR9 – pages 1048-1049 Carol Ingleston – Page 1108 – para 9, page 1214-1216(38) Sgt Scruton – page 1325-para 5.16 & AS 16
3	Unauthorised encampment at Donnithorne Avenue, Nuneaton	7 th September 2018	Carol Ingleston – page 1217-1218 – (39)
4	Unauthorised encampment at Vernon’s Lane, Nuneaton. Forcing entry onto land using an angle grinder to break the barrier and block access to the field	13 th September 2018 to 14 th September 2018	Sgt Scruton – page 1323 para 5.11 & AS 11

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

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2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any

evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

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You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,

Community Base,

113 Queens Road,

Brighton, East Sussex, BN1 3XG

Tel: 01273 234 777

email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh

Legal Services Manager

Name of Defendant: Terry Maughan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Thomas Corcoran
Plot10 Kirby Glebe Farm
Hartshill
Nuneaton
CV10 0TB

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Corcoran,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your previous address 7 Sandiacre, Long Green, Cressing, Baintree, Essex CM77 8DL by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 8.42a.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

X424-409B/00351994

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment at Gala Fields, Avenue Road, Nuneaton	1 st October 2016 to 3 rd October 2016	Sgt Scruton – page 1335 – para 5.50 & ‘AS 50’
2	Unauthorised encampment at Arbury Avenue, Bedworth	3 rd October 2016 to 10 th October 2016	Sgt Scruton – Page 1335 – para 5.50 & ‘AS 50’
3	Breaking lock on gates to gain access and forming unauthorised encampment at Vernons Lane, Nuneaton. Leaving litter, human excrement, used toilet paper and other litter in the bushes and dismantling fence to neighbouring land to gain access to it. Causing disruption to the school activities and school closure.	3 rd June 2018 to 6 th June 2018	Matthew Pike – pages 991-992 Carol Ingleston – page 1107/8 – para 7 Martyn Stephens – page 1282 – para 9 Sgt Scruton – page 1327 – para 5.22 & ‘AS 22’
4	Causing criminal damage to fence by forced entry onto land and forming an unauthorised encampment at Vernons Lane, Nuneaton. Using the field as a toilet, throwing objects at informants, training dogs to fight and riding quad bikes and causing a nuisance.	9 th July 2018 to 6 th August 2018	Philip Richardson – Page 70 – para 40 & 95, Page 81 – para 95 Carol Ingleston page 1109 – para 17, pages 1254-1262-‘CI7’ Sgt Scruton -page 1326-para 5.19
5	Forcing entry and forming unauthorised encampment on the Gala Fields, Avenue Road Nuneaton. Allowing dogs to roam freely and attack members of the public. Riding quad bikes on the field causing a nuisance to members of the public. Leaving bagged refuse, human excrement, used toilet paper and other litter on the land.	6 th August 2018 to 16 th August 2018	Philip Richardson – page 71, para 45 Carol Ingleston – page 1108-para 8 Sgt Scruton – Page 1325/6 – para 5.17 – ‘AS 17’.
6	Encamping on land at the Jubilee Centre, Nuneaton. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	15 th August 2018 to 25 th August 2018	Philip Richardson – Exhibit PR9 – pages 1048-1049 Carol Ingleston – Page 1108 – para 9

			Sgt Scruton – page 1325-para 5.16 & AS 16
7	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	<p>Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104</p> <p>Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3</p> <p>Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9)</p> <p>Sgt Scruton page 1324/1325, para 5.15 & AS 15.</p>
8	Unauthorised encampment on Gala Fields, Avenue Road, Nuneaton in breach of licence agreement by allowing more than 12 caravans onto the land and causing a nuisance	25 th September 2018 to 6 th October 2018	<p>Philip Richardson – page 72 – para 52 & 53, Pages 1046d – 1046e</p> <p>Carol Ingleston – page 1111 – para 27 – 30</p>
9	Causing damage to barrier on land and unauthorised encampment at the Pingles Leisure centre Carpark, Avenue Road, Nuneaton	6 th October 2018 to 15 th October 2018	<p>Philip Richardson – page 1104</p> <p>Sgt Scruton, page 1323, para 5.10 & AS 10.</p>
10	Causing damage to hedge on land by driving through to form an unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton and physically and verbally abusing staff members at the leisure centre. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	8 th January 2019 to 14 th January 2019	<p>Philip Richardson – Page 73, para 57, Page 1104</p> <p>Carol Ingleston – page 1112- para 36, page, pages 1227-1229(43)</p> <p>Sgt Scruton, page 1322, para 5.2 & AS 2</p>

11	Unauthorised encampment on the Gala Playing Fields, Avenue Road, Nuneaton and leaving untreated excrement on the land, causing damage to the football playing field and fly-tipping. Leaving human excrement, used toilet paper, bagged refuse and litter on the land.	14 th January 2019 24 th January 2019	Philip Richardson page 73, para 60 & page 75 para 73, page 81-para 96 Carol Ingleston – para 39, page 1112- para 37, pages 1230-1234 (44), pages 1272-1279 (CI10) Robert John Watson – page 1309- para 9, pages 1312 -Exhibits RW! And 1314 -RW2 Sgt Scruton page 1321, para 5.1
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3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

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4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

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3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
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Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Thomas Corcoran

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

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I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Thomas Maughan
11 Kanes Hill Caravan Site
Botley Road
Southampton
SO19 0SA

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Maughan,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

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1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed by way of service a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	<p>Unauthorised encampment at Kersley Community Centre, Howat Road, Kersley</p> <p>Forced entry onto land, driving over the football pitch and causing damage to it, threats to kill towards members of the public walking their dogs and towards a young boy aged 8</p>	27 th July 2018 to 1 st August 2018	<p>Carol Ingleston – page 1206 – 1207 (35)</p> <p>Sgt Scruton page 1326 – para 5.18 & AS18</p>

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

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4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Thomas Maughan

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr William Bridges
16 Ling Croft.
Brough
North Humberside
HU15 1TU

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mr Bridges,

Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and others
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address 16 Ling Croft, Brough, North Humberside HU15 1TU by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 11/03/2019 at 10.57a.m. The deemed date of service of the Claim Form is 13/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 03/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Causing damage to barrier to force access and forming unauthorised encampment at Pingles Leisure Centre Carpark, Avenue Road, Nuneaton. Reports of theft and antisocial behaviour from customer and staff at the Leisure Centre.	24 th August 2018 to 30 th August 2018	Philip Richardson – page 80- para 88 & page 81 – para 97, page 1104 Exhibit PR 4 – WS of Adele Glenn – page 997-998 para 3 Carol Ingleston – pages 1263-1267 – para 18 (CI8) & pages 1268-1271(CI9) Sgt Scruton page 1324/1325, para 5.15 & AS 15.

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.

3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

5.5 You are advised to take legal advice on your position.

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777

email: fft@ghpsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: William Bridges

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mrs Winnie McDonaugh
Caravan 14
Dun Roamin Park
Whitfield
Brackley
Northants
NN13 5TD

Starfax No: 0870 608 9457
DX Nuneaton 16458

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:

waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 1 October 2021

Our Ref: WE/X424-409B/

Your Ref:

Dear Mrs McDonaugh,

**Nuneaton and Bedworth Borough Council and Warwickshire County Council -v-
Thomas Corcoran and others**
Claim No: QB-2019-000616

We are writing to you because you are one of the defendants in the above proceedings. The terms of this letter have been approved by the High Court to ensure that you are aware of the proceedings and the claim that is being made against you personally.

1. The Claim

1.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council commenced proceedings against you (and other defendants) on 22nd February 2019. The **Claim Form** was served on you at your address Caravan 14, Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD by personally delivering through the letter box of the address a copy of the Order of Mr Justice Dove dated 22nd February 2019, sealed Claim Form, Application Notice, draft orders and a USB stick containing evidence in support of the claim in a clearly addressed sealed envelope on 09/03/2019 at 14.10p.m. The deemed date of service of the Claim Form is 12/03/2019.

1.2 Under the rules of Court, you were required to file an acknowledgement of service and any written evidence you wished to rely upon by 02/04/2019. To date, you have not filed an acknowledgement of service or any evidence.

1.3 The Court granted an interim injunction order against you on 19/03/2019. A copy of the injunction order sealed by the Court on the 22 March 2019 is enclosed.

1.4 Further to the Order of Mr Justice Nicklin dated 30/07/2021, please find enclosed a sealed Amended Claim Form and a sealed Application Notice seeking permission from the Court to rely upon further evidence.

2. The Claim against you

2.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council alleges that you did the following acts and relies on the evidence :

	Description	Date	Witness Statement Ref
1	Unauthorised encampment on Dunns Close, Caldwell Industrial Estate, Nuneaton..	21st June 2018 to 4th July 2018	Carol Ingleston – page 1204 – 1205 (34) Sgt Scruton – page 1326/7 para 5.20 & AS20

3. The Evidence relied upon

3.1 Nuneaton and Bedworth Borough Council and Warwickshire County Council relies upon the evidence in support referred to in the final column of the table above.

Copies of the witness statements relied upon to prove the matters alleged against you in Paragraph 2 are set out on the enclosed USB stick. If you are unable to access the documents, please contact me and I will arrange for a printed copy to be made available to you. You will have to confirm the delivery address for this to happen, as the package will be rather large.

4. The Final Hearing

4.1. The Court intends to give further directions, including setting a timetable towards a final hearing in the Autumn of 2021.

4.2 At the final hearing, Nuneaton and Bedworth Borough Council and Warwickshire County Council will ask the Court to impose an injunction against you in the following terms:

Until further order, The First to Fifty Third Defendants are forbidden from:

1. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton

and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.

5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The Court will also be asked to make an order that a power of arrest be attached to the above terms of the order and a costs order in a sum to be assessed by the Court.

4.3 At the final hearing the Court will decide whether Nuneaton and Bedworth Borough Council and Warwickshire County Council's evidence justifies making these orders.

5. Your opportunity to respond and to be heard at the hearing

5.1 As a defendant you can attend the final hearing, but as you have not filed an acknowledgement of service or filed any evidence, you will need the Court's permission to participate in the hearing.

5.2 The Court wants to understand what you say in answer to the allegations that Nuneaton and Bedworth Borough Council and Warwickshire County Council is making against you as set out above. To assist, you can fill in and return the attached short Response Form. A reply-paid envelope is provided.

5.3 If you want the Court to consider any evidence, you should send it to us as soon as you can. The Court has set a deadline of **24 September 2021** for you to send to us any evidence upon which you want to rely. If you think you will need more time to submit your evidence, you should contact us and ask for an extension of time.

5.4 If you do not respond to this letter, fail to provide any evidence that you want the Court to consider and/or do not attend the final hearing, the Court will make such order as it considers is appropriate and justified by the evidence provided to the Court.

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Advice and assistance may also be available from:

Friends, Families and Travellers,
Community Base,
113 Queens Road,
Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

Yours sincerely,

Waheeda Sheikh
Legal Services Manager

Name of Defendant: Winnie McDonaugh

RESPONSE FORM

1. Did you receive the Claim Form referred to in Paragraph 1.1 of the Letter?

Yes/No

2. Do you admit or deny the allegations made against you in Paragraph 2.1?

Admit/Deny

3. If you deny the allegations, please state briefly what you say in response. (If you need more space for your answer, please use a further sheet of paper.)

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

5. If you do not intend to attend the final hearing, you can provide below any information that you would like the Court to consider. (If you need more space for your answer, please use a further sheet of paper.)

Please see over

Statement of Truth

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.

I believe that the facts stated in this Response Form are true.

Signature:

Name:

Date:



Claim Form (CPR Part 8)

This Claim Form has been amended pursuant to the Order of Mr Justice Nicklin dated 30 July 2021 and the Order of Mrs Justice Farbey dated 23 August 2021. All edits appear in RED

In the High Court of Justice Queen's Bench Division		2204
Claim no.	QB-2019-000616	
Fee Account no.	PBA0087028	
Help with Fees - Ref no. (if applicable)	H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>	

Claimant

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL
Town Hall, Coton Rd, Nuneaton CV11 5AA

(2) WARWICKSHIRE COUNTY COUNCIL
Shire Hall, Warwick CV34 4RL



Defendant(s)

(1) Mr THOMAS CORCORAN AND 52 OTHER NAMED DEFENDANTS IN SCHEDULE QB-2019-000616
1 OF THE CLAIM FORM
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

Details of claim (see also overleaf)

1. The Claimants seeks an interim and final injunction pursuant to s.222 of the Local Government Act 1972 and/or s.187B of the Town and Country Planning Act with a power arrest attached to the appropriate provisions of the court order. The Claimants seeks to restrain the repeated breaches of directions to leave the land, served pursuant to sections 61 and 77 of the Criminal Justice and Public Order Act 1994 (CJPOA).

2. The First and Second Claimant are local authorities and the administrative boundaries of the First Claimant are marked on the map attached to the Draft Order at Schedule 2. The Claimant seeks an injunction to protect its administrative area from further unauthorised encampments by the First to Fifty-Third Defendants (except those against whom proceedings have been discontinued), who have formed unauthorised encampments within the Borough. Further, the First and Second Claimant seek an order against the Fifty-Fourth Defendant, Persons Unknown, to prevent Persons Unknown from encamping on identified areas within the Borough shaded in red on the map attached to the Draft Order at Schedule 3; as these areas have suffered in total 103 unauthorised encampments throughout the last 3 years as detailed in the evidence. These encampments have been formed on both private and public land including: public open space, the highways, village centres, industrial estates, residential areas, and close to schools.

Defendant's
name and
address

(1) Mr Thomas Corcoran, 7 Sandiacre,
Long Green, Cressing, Baintree, Essex,
CM778DL

See attached for further details

	£
Court fee	528
Legal representative's costs	TBA
Issue date	22 February 2019

Details of claim (continued)

3. The areas to be protected are within the administrative boundaries of Nuneaton and Bedworth Borough Council and the injunction is sought as the Claimants have experienced significant and prolonged issues associated with unauthorised encampments within the First Claimant's administrative area, including: fly-tipping, anti-social behaviour and environmental and health risks associated with these encampments.

4. The encampments are having a detrimental impact on local business, as well as on the enjoyment of public spaces.

5. Existing powers are being undermined and are ineffective, the law is being flouted repeatedly and the Claimants have experienced significant expense both in legal costs and clean-up costs. Service of directions to leave land by the Claimants or the Police pursuant to s.61 and section 77&78 of the CJPOA only leads to the encampments moving from one site to the next site and has not deterred the travellers from forming encampments within the area marked in red on the map attached at Schedule 2.

6. For the reasons set out in the witness statements, it is necessary and expedient for the promotion and protection of the interests of the inhabitants of First Claimant and to prevent apprehended breaches of planning control to seek an injunction to prevent the establishment of unauthorised encampments by named individuals within the area marked in red on the attached map at Schedule 2 to the Draft Order and to prevent Persons Unknown from forming unauthorised encampments on the areas identified on the map at Schedule 3 of the Draft Order.

7. It is also necessary to bring these proceedings against Persons Unknown to deter unauthorised encampments on sites, which have been identified on the map in Schedule 3. It is not possible to identify all of the individuals who have formed these unauthorised encampments, many of whom are not prepared to identify themselves.

CAROLINE BOLTON

Sharpe Pritchard LLP
Elm Yard
10-16 Elm Street
London WC1X 0BJ
DX: 353 London/Chancery Lane
Tel: 020 7405 4600
Fax: 020 7242 2210
Email: wrose@sharpepritchard.co.uk

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

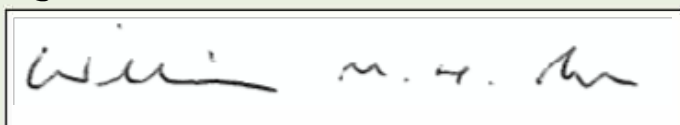
Statement of Truth

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.

☐ **I believe** that the facts stated in these particulars of claim are true.

☒ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

1

Month

Sept

Year

2021

Full name

William Maxwell Hunt Rose

Name of claimant's legal representative's firm

Sharpe Pritchard LLP

If signing on behalf of firm or company give position or office held

Partner

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

List of Defendants and their addresses

- (1) THOMAS CORCORAN – Plot 10 Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (2) JESSICA DODD, ~~7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL~~ Plot 10, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (3) MICHAEL DOYLE, 6 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (4) LUKE DELANEY, ~~12 Sandiacre, Long Green, Cressing, Braintree, Essex, CM77 8DL~~ Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (5) PATRICK MCGINLEY, ~~7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL~~ Barn Fisheries, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (6) ALPHONSUS MCGINLEY, 7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (7) MICHAEL STOKES, 29 Oaktree Field Caravan Site, Odstock Road, Salisbury, Wiltshire SP2 8BY
- (8) MICHAEL STOKES, 6 Horsdean Travelers Site, Braypool Lane, Patcham Brighton, East Sussex BN1 8PP
- (9) DENNIS STOKES, ~~12 Bashley Road Caravan Site, Bashley Road, London, NW10 6TH~~ Plot 6 Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (10) DENNIS STOKES (JNR), Caravan 6 Dun Roamin Park, Whitfield, NN13 5TD
- (11) BRIAN STOKES, 12a, Orchard Drive, Smithy Fen, Cottenham, Cambridgeshire, CB24 8PT
- (12) JOHN MAUGHAN, 14 Long Green, Cressing, Braintree, Essex, CM77 8DL
- (13) TERRY MAUGHAN, 70 Exton Avenue, Luton, Bedfordshire, LU2 0LJ
- ~~(14) TERRY MAUGHAN, 10 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~
- (15) PATRICK MAUGHAN, 12 Bashley Road Caravan Site, Bashley Road, London, NW10 6TH
- (16) OWEN MAUGHAN, 7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (17) OWEN MAUGHAN, 8 Imari Park, 38 Russell Street, Derby DE24 8AL
- ~~(18) BERNARD CORCORAN, No Fixed Abode~~
- ~~(19) FRANCIS CORCORAN, No Fixed Abode~~
- (20) FRANCIS MAUGHAN, 14 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (21) MARTIN MAUGHAN, 81 Constitution Road, Chatham, Kent, ME5 7DN
- (22) THOMAS MAUGHAN, 11 Kaneshill Caravan Site, Botley Road, Southampton, SO19 0SA
- (23) JOHN MONGAN, 1 Gaptown Hall Road, Great Yarmouth, Norfolk, NR31 0NL
- ~~(24) MARTIN MONGAN, 14 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL~~
- (25) MARTIN MONGAN, 9 Limehouses, Boathorse Road, Stoke-On-Trent, Staffs ST6 4QQ
- (26) LEONARD MONGAN, 8 Pendles Paddock, Marlow Road, Stokenchurch, High Wycombe, Bucks, HP14 3UW
- (27) PAUL McDONOUGH, 9 Russell Street, Derby
- ~~(28) SIMON McDONOUGH, 3 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~
- (29) BERNARD McDONOUGH, 37 Boathorse Road, Stoke-On-Trent, Staffordshire, ST7 4JA
- (30) JOHN McDONOUGH, Caravan 7 Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD
- (31) MIKE McDONOUGH, 62 De Laly Street, Ashton-On-Ribble, Preston, Lancashire, PR2 2DD
- (32) MARTIN McDONOUGH, 29 Speyside Court, Orton, Southgate, Peterborough, PE2 6SN
- (33) AARON McDONOUGH, 9 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- ~~(34) KATHLEEN McDONOUGH, 3 Orchard View, Horseman Side, Brentwood, Essex, CM14 5SU~~
- (35) WINNIE McDONOUGH, Caravan 14, Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD
- ~~(36) MARTIN WARD, 73 Mullacreevie Park, Armagh, BT60 4BB~~
- ~~(37) PAT WARD, 333 Mullacreevie Park, Armagh, BT60 4BB~~
- (38) MICHAEL WARD, Splashes, Castle Acre Road, Swaffham, Norfolk, PE37 7XE
- (39) KATHLEEN WARD, 2 Imari Park, 38 Russell Street, Derby DE24 8AL

- ~~{40} — ROSELEEN WARD, 6 St Agnells Lane, Hemel Hempstead, Herts, HP2 7AX~~
- (41) BERNIE SWEENEY, Kanes Hill Caravan Park, 11 Botley Road, Southampton, SO19 0SA
- (42) JOHN CONNORS, 2 Costalot Stables, Heath Road, Leicestershire, LE67 1DG
- ~~{43} — TRACEY BROWN, 72 Lower Ecton, Ecton Lane Caravan Site, Northants NN3 5HQ~~
- (44) WILLIAM BRIDGES, 16 Ling Croft, Brough, North Humberside, HU15 1TU
- ~~{45} — TOM WARD, No Fixed Abode~~
- ~~{46} — EDDIE McDONOUGH, No Fixed Abode~~
- ~~{47} — EDDIE (AKA EDWARD) WARD, No Fixed Abode~~
- ~~{48} — CHRISTOPHER McDONOUGH, No Fixed Abode~~
- ~~{49} — WILLIAM DOHERTY, No Fixed Abode~~
- ~~{50} — GERRY O'BRIEN, No Fixed Abode~~
- ~~{51} — ELIZABETH O'BRIEN, No Fixed Abode~~
- ~~{52} — PEARL BLAINLEY, No Fixed Abode~~
- ~~{53} — FIONA WARD, No Fixed Abode~~
- (54) PERSONS UNKNOWN forming unauthorised encampments within the Borough of Nuneaton and Bedworth

Application notice

For help in completing this form please read the notes for guidance form N244 Notes

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form:
<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

In the High Court of Justice Queen's Bench Division	
Claim no.	QB-2019-000616
Fee Account no.	PBA0087028
Warrant no. (if applicable)	
Claimant (including ref.)	(1) Nuneaton and Bedworth Borough Council (2) Warwickshire County Council
Defendants (including ref.)	(1) Thomas Corcoran (2) – (53) Other Named Defendants (54) Persons Unknown
Date	02 Sep 2021 2 September 2021

1. What is your name or, if you are a legal representative, the name of your firm?

Sharpe Pritchard LLP

QB-2019-000616

Sub Event ID: 43

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a solicitor whom do you represent

Claimant

3. What order are you asking the court to make and why?

Pursuant to the Order of the Honourable Mr Justice Nicklin dated 30 July 2021, at paragraph 4(d), the Claimant seeks permission to rely on additional evidence in the form of the witness statement of Police Sergeant Andrew Scruton. This witness statement is adduced to link named Defendants to specific conduct complained of at sites over which an injunction is sought.

4. Have you attached a draft of the order you are applying for

☐ Yes

☒ No

5. How do you want to have this application dealt with?

☐ at a hearing

☒ without a hearing

☐ at a telephone hearing

6. How long do you think the hearing will last?

Hours

Minutes

Is this time estimate agreed by all parties?

☐ Yes

☒ No

7. Give details of any fixed trial date or period

-

8. What level of Judge does your hearing need?

High Court

9. Who should be served with this application?

Defendants

- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

-

10. What information will you be relying on, in support of your application?

- ☐ the attached witness statement
- ☐ the statement of case
- ☒ the evidence set out in the box below

If necessary, please continue on a separate sheet

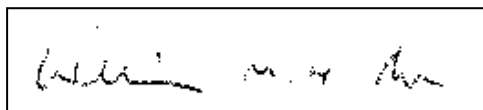
1. Pursuant to the Order of the Honourable Mr Justice Nicklin dated 30 July 2021, at paragraph 4(d), the Claimant seeks permission to rely on additional evidence in the form of the witness statement of Police Sergeant Andrew Scruton and its exhibits.
2. This witness statement is adduced to link named Defendants to specific conduct complained of at sites over which an injunction is sought.
3. A copy of the evidence sought to be admitted is attached.

Statement of Truth

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.

- ☐ I **believe** that the facts stated in section 10 (and any continuation sheets) are true.
- ☒ **The Applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. I **am authorised** by the applicant to sign this statement.

Signature



- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

2

Month

September

Year

2021

Full name

William Maxwell Hunt Rose

Name of applicant's legal representative's firm

Sharpe Pritchard LLP

If signing on behalf of firm or company give position or office held

Partner

Applicant's address to which documents should be sent.

Building and street

Elm Yard

Second line of address

10-16 Elm Street

Town or city

London

County (optional)

Postcode

WC1X 0BJ

If applicable

Phone number

020 7405 4600 / 07799 900961

Fax number

020 7204 2244

DX number

353 London/Chancery Lane

Your Ref.

WMHR/170.19

Email

wrose@sharpepritchard.co.uk

WS on behalf of the Claimant
Sgt A. Scruton
2nd Statement
Dated: 01.09.2021

Claim No: QB-2019-000616

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

**In the matter of Section 222 Local Government Act 1972 and Section 187B Town
and Country Planning Act 1990**

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN

(2) –(53) OTHER NAMED DEFENDANTS

**(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

WITNESS STATEMENT OF POLICE SERGEANT ANDREW SCRUTON 0946

I, Police Sergeant Andrew Scruton 0946, of Warwickshire Police, Nuneaton Police Station, Warwickshire Justice Centre, Vicarage Street, Nuneaton CV11 4DW,

WILL SAY as follows:

1. I am duly authorised to make this statement in support of the Claimant's application for an injunction pursuant to Section 222 of the Local Government Act

1972 and Section 187B of the Town and Country Planning Act 1990. I make it from my own information, knowledge and belief save where otherwise stated.

2. I make this statement to support the information provided in my first statement made on the 6th March 2019, regarding the traveller encampments within the area of Nuneaton and Bedworth between the period 4th August 2014 to 24th January 2019.

Background

3. In my first statement I have summarised and attached copies of the Storm reports of the incidents of unauthorised encampments in the Borough, and I referred to the family names of those individuals who were prominent in the area at the time, namely the Corcoran's, the Dodd's, the Delaney's, the Stokes' and the Maughan's (amongst others). The Storm reports are reports taken by the operator at the time of the incident (i.e. the unauthorised encampment); they do not contain the names of the individuals involved in the relevant incident, as these would not be known to them at the time of the incident, but would have been gathered thereafter from the vehicle checks conducted at the time. Revisiting the notes made at the time of the incidents referred to in the exhibited Storm reports has enabled me to link the individuals named in these proceedings to the specific incident logs.
4. The encampments referred to at para 5.1 & AS1, para 5.2 & AS2, para 5.10 & AS10, para 5.11 & AS11, para 5.15 & AS15, para 5.16 & AS16, para 5.17 & AS17, para 5.21 & AS21, para 5.22 & AS22, para 5.39 & AS39, para 5.46 & AS46, para 5.47 & AS47, para 5.48 & AS48 and para 5.49 & AS49 (all references to my first statement and accompanying exhibits) were all relatively large encampments. These encampments were occupied by the named defendants from the Corcoran, Dodds, Stokes and Delaney families, who were at times joined by the named members of the McDonagh, Doyle, Mongan and Maughan families (those individuals being identified and named in the Claim Form and Interim Injunction Order).
5. One key element to the encampments referred to above was that, contemporaneous with those encampments, the Corcoran family had attracted growing support from associate families for their young daughter, who was

extremely ill and undergoing treatment at the Queen Elizabeth Hospital Birmingham and the University Hospital Coventry.

6. Of all the encampments suffered by the Borough, it is the encampments including the families and individuals named in these proceedings that have had the greatest detrimental impact on the land and local communities. These family groups and their encampments also had a similar impact across the County, and particularly in the Warwick District as they moved between the two areas.
7. Thomas Corcoran and Dennis Stokes featured frequently in these encampments; they were present most of the time, and they are most certainly influential characters whose presence had a following.
8. Both of the Corcoran and Stokes families are now residing on Kirby Glebe farm in North Warwickshire along with other associated nominals in the Delaney families.

Identification of Named Defendants

9. I can confirm that I have re-examined the evidence that I provided in 2019, the associated Storm reports relating to the unauthorised encampments and the PNC to confirm the vehicle checks carried out on 18th November 2018 (following a request to do so from the Claimant) of the insured or registered keeper of the vehicles noted as being on the land at the time of these encampments. I can confirm that the sources I have examined show that the named defendants in these proceedings are linked to vehicles noted as being present at the encampments, as set out below.
10. In my first statement at para 5.20 I refer to the encampment at the Gala Fields, Avenue Road, Nuneaton between 21.06.2018 and 04.07.2018 and attach the police incident log at 'AS20'. The PNC records shows that the following vehicles were present at the encampment at the time and confirm the details of registered keepers of those vehicles as follows:
 - FN18HEJ linked to Winnie McDonagh and Martin McDonagh
 - HX18TWJ linked to John McDonagh and Bernard McDonagh.
 - HGZ8090 linked to Mike McDonagh.

11. At para 5.19 I refer to an encampment at Vernon's Lane, Nuneaton on 08.07.2018 and attach the police incident logs at 'AS 19'. The PNC records shows the following vehicles as being present at the encampment and the details of the registered keepers of those vehicles at the time:

- **BL66XGK** linked to **Alphonsus McGinley**
- **SK67PNY** linked to **Luke Delaney**
- **AV13OHZ** linked to **Martin Mongan,**
- **HJ18EFT** linked to **Leonard Mongan.**
- **L518XXB** linked to **Aaron McDonagh**
- **SL18UVO** linked to **Martin Maughan**
- **FL18XZZ** linked to **Owen Maughan.**

12. At para 5.15 I refer to an encampment at the Pingles Leisure Centre Car Park, Avenue Road, Nuneaton between the 24.08.2018 and 30.08.2018 and attach the police incident logs at 'AS 15'. The PNC records show the following vehicles as being present at the encampment and the details of the registered keepers of those vehicles at the time:

- **MT17WJV** linked to **Martin Ward.**
- **LM67WZX** linked to **Michael Stokes.**
- **SL18JXU** linked to **Luke Delaney and Jessica Dodds.**
- **EO18VWV** linked to **John Connors**
- **SL18UYE** linked to **Thomas Corcoran.**
- **YM15UNV** linked to **William Bridges.**
- **SN17OEA** linked to **Patrick McGinley.**
- **HJ18BUH** linked to **Martin Mongan.**
- **BJ64TNE** linked to **John Maughan.**
- **AO15WJF** linked to **John Mongan.**
- **YD18NLX** linked to **Michael Ward. and Frances Corcoran.**

13. At para 5.18 I refer to an encampment at the Keresley Community Centre, Nuneaton between 27.07.2018 to 01.08.2018 and attach the police incident logs at 'AS 18'. The PNC records show the following vehicles as being present at the

encampment and the details of the registered keepers of those vehicles at the time:

- **YS17ZBX** linked to **Pat Ward**
- **WK18YDL** linked to **Thomas Maughan**.
- **NV17NLL** linked to **Bernie Sweeney**.

14. At para 5.11 I refer to an encampment at Vernon's Lane, Nuneaton between 13.09.2018 to 14.09.2018 and attach the police incident logs at 'AS 11'. The records show the following vehicles as being present at the encampment and the details of the registered keepers of those vehicles at the time:

- **ND13DZE** linked to **Michael Stokes**.
- **SN67ZNR** linked to **Michael Stokes**.
- **ND82HWJ** linked to **Owen Maughan**.
- **HG67QJV** linked to **Francis Maughan**.
- **SN68UHS** linked to **Terry Maughan**.
- **DV18BEJ** linked to **Paul McDonagh**.
- **LG64AEM** linked to **Kathleen Ward**.
- **SN18LOF** linked to **Michael Stokes**.
- **MM15WVE** linked to **Patrick McGinley**.

15. At para 5.17 I refer to an encampment at the Gala Fields, Avenue Road, Nuneaton between 06.08.2018 to 16.08.2018 and attach the police incident logs at 'AS 17'. The records show the following vehicles as being present at the encampment and the details of the registered keepers of those vehicles at the time:

- **SN66WZX** linked to **Terry Maughan**.
- **SN17OEA** linked to **Patrick McGinley**.
- **YN15UNV** linked to **Patrick Maughan**.
- **LN09SXF** linked to **Brian Stokes**, and **Bernard Stokes**.
- **SL18JXT** linked to **Michael Doyle**.
- **SL18UYD** linked to **Dennis Stokes** and **Dennis Stokes JNR**.
- **LM67WZX** linked to **Michael Stokes**.
- **SM18FAJ** linked to **Thomas Corcoran**.

16. There were numerous recorded incidents associated with each encampments involving crime and anti-social behaviour. I can confirm that Thomas Corcoren was arrested and admitted damage to the picket fence to gain entry on land belonging to the Discovery Academy at Vernons Lane, Nuneaton on 13th September 2018, for which he received a Caution and paid for the damage caused. The details relating to this incident are referred to in AS 11.

Statement of Truth

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 ATSOL PS946

Dated 1 / 9 / 2021

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No. QB-2019-000616

B E T W E E N :

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

WITNESS STATEMENT OF MARTYN STEPHENS

I, MARTYN STEPHENS, of Shire Hall, Warwick CV34 4SX WILL SAY as follows:

- 1) I am employed by the Second Claimant as the Community Safety Team Leader for the county of Warwickshire. The facts detailed below are either within my own personal knowledge or have been ascertained from the Second Claimant's files and I am duly authorised to make this statement on the Second Claimant's behalf.
- 2) The Gypsy and Traveller team of Warwickshire County Council keep records of Unauthorised Encampments that take place across the County of Warwickshire. I have access to these records.
- 3) Having reviewed these records I can confirm that since the grant of an Injunction to the Claimants pursuant to Section 222 of the Local Government Act 1972 and

Section 187B of the Town and Country Planning Act 1990 on an interim basis on 22 March 2019 (the Interim Injunction) there has been a considerable reduction in unauthorised encampments on land owned by the Second Claimant as covered by the Interim Injunction and more particularly detailed at Schedule 3 of the Interim Injunction. In fact, since 22 March 2019 there have been no recorded unauthorised encampments on any of the parcels of land owned by the Second Claimant detailed in Schedule 3 of the Interim Injunction (the land).

- 4) The Second Claimant is of the opinion that the reduction in the number of unauthorised encampments on the land is testament to the effectiveness of the Interim Injunction. However, it also should be noted that the Covid 19 pandemic and the resultant lockdowns imposed by Government has meant that there has been, generally, a reduction in the movement of members of the Gypsy and Traveller community which may have also been a contributory factor in the reduction of unauthorised encampments on the land. The Second Claimant anticipates that now that the restrictions associated with the Covid 19 pandemic have eased, making the Interim Injunction a final Order will be pivotal to sustain the reduction in unauthorised encampments on the land as reflected since the grant of the Interim Injunction in March 2019.

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.



Martyn Stephens

Community Safety Team Leader

24.6.22

.....

Date

Statement on behalf of the Claimant
Philip Richardson Sixth Statement
Exhibit 'PR1'
Dated: 27th July 2022

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No. QB-2019-000616

B E T W E E N :

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE BOROUGH
OF NUNEATON AND BEDWORTH

Defendants

SIXTH WITNESS STATEMENT OF PHILIP RICHARDSON

I, PHILIP RICHARDSON, Director of Planning and Regulation at Nuneaton and Bedworth Borough Council, Town Hall, Cotton Road, Nuneaton, Warwickshire CV11 5AA will say as follows:-

1. I make this witness statement pursuant paragraph 4 of the Order of the Honourable Mr Justice Linden dated 23rd May 2022. I make this witness statement in support of Nuneaton and Bedworth Borough Council's (the 'Council') application for injunctive relief pursuant to the Town and Country Planning Act 1990, s187B against both named Individuals and Persons Unknown who form unlawful encampments within the Council's administrative area. I am authorised by the Council to make this witness statement on its behalf.

2. This statement is made from my own personal knowledge and/or from information ascertained from files and records kept by the Council. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been made through the use of email and telephone communication with the Council's internal legal department and external legal representatives.
3. I shall refer to the interim injunction order dated 22nd March 2019 as the 'Injunction Order'.
4. I exhibit to this witness statement a bundle of documents marked PR1. References to that exhibit are in the format PR1/page number.

Encampments since March 2019

5. Since March 2019, when the Injunction Order was granted, there have been at least 12 unauthorised encampments consisting of caravans and vehicles on land and sites owned and managed by the Council. The sites concerned are all covered by the Injunction Order and have included public open space, recreation grounds and car parks.
6. The First Claimant has been able to effectively manage these encampments with the assistance of Warwickshire Police by attending the encampments together, making the occupants aware of the Injunction order, undertaking welfare checks and explaining the implications of remaining on the land in breach of the Injunction Order. Details of the encampments are as follows:-
 - i) On 19 April 2019, 5 caravans camped on land at Miners Welfare Park, Bedworth, which is a site protected by the Injunction Order and which is listed at Schedule 3 of the Injunction Order as site number 51. This encampment was over the Easter break and there was not any contact with the occupiers of the caravans. The caravans left without any enforcement action being taken on 22 April 2019. The

site was left in a reasonable condition and the authority did not incur additional clean-up or repair costs.

- ii) On 3 May 2019, 5 caravans camped on land at Stanley Road, Nuneaton which is a site protected by the Injunction Order and which is listed at Schedule 3 of the Injunction Order as site number 3. An officer from the Private Sector Housing team attended the site with the Police to carry out a welfare check. On ascertaining that there were no welfare needs, the occupants were informed of the Injunction Order and the Police explained the consequences of remaining on the land. The caravans left without Council enforcement on the same day and there were no additional clean-up or repair costs incurred.
- iii) On 9 May 2019, 3 caravans camped on land at Dunns Close, Nuneaton, which is a site protected by the Injunction Order and which is listed at Schedule 3 of the Injunction Order as site number 84. An officer from the Private Sector Housing Team attended with the Police to carry out a welfare check. On finding that there was not a welfare need, the Police explained the consequences of remaining on the land in breach of the Injunction Order. The caravans left without Council enforcement on 10 May 2019 and there were no additional clean-up or repair costs incurred.
- iv) On Saturday 6 July 2019, 2 caravans camped on land at The Dingle, Nuneaton to the rear of Camp Hill Primary School, which is a site protected by the Injunction Order and which is listed at Schedule 3 of the Injunction Order as site 31. The encampment was reported to the Police by our Private Sector Housing team who attended the site and explained to those occupying the land the existence of the Injunction Order and the consequences of breaching the Injunction Order. The caravans left on Sunday 7 July 2019 without further enforcement action being taken by the Council. There were no additional clean up or repair costs incurred as a result. I note that encampments on this site in the previous year had resulted in the school being closed due to antisocial behaviour.

- v) On 23 September 2019, 1 caravan and van (reg no – NJ53 2GM) parked on land at Beverley Avenue, Nuneaton, which is a site protected by the Injunction Order and which is listed at Schedule 3 of the Injunction Order as site number 43. The Police were notified and attended the site and explained the Injunction Order and the consequences of remaining on the land in breach of the Injunction Order to the occupants. The caravans left without further enforcement action being taken on 23 September 2019 and there were no additional clean-up or repair cost incurred.
- vi) On 20 December 2019, 3 caravans camped on land at Dunns Close, Nuneaton, which is a site protected by the Injunction Order and which is listed at Schedule 3 of the Injunction Order as site number 84. The Police were notified of the encampment and attended to explain the Injunction Order and the consequences of remaining on the land in breach of the Injunction Order. The caravans left without further enforcement action being taken on 20 December 2019. There were no additional clean-up or repair costs incurred as a result.
- vii) On 10 August 2020, 5 caravans were reported as being encamped on the playing field at the rear of Newdigate Sports and Social Club, Smorrall Lane, Bedworth, which is a site protected by the Injunction Order and which is listed at Schedule 3 as site 47. An officer from the Private Sector Housing Team attended with the Police and handed a copy of the Injunction Order to the occupants of the vehicles. The officer reported that there were no welfare issues brought to their attention and the group were informed they had until 2.00p.m. to vacate the land. The encampment moved on the same day; however, contractors had to be called in to clean up the site.
- viii) On 24 August 2020, 6 caravans were reported as having set up an encampment on St Giles Play Park, Ash Green, which is a site protected by the Injunction Order and which is listed at Schedule 3 as site number as site number 37. This encampment was reported to the Police. An officer from the Private Sector Housing team visited on 25 August 2020 to find the caravans had left before their arrival.

- (x) On 1 October 2021 two transit vans adapted as camper vans were reported as being encamped on Dunns Close, Nuneaton, which is a site protected by the Injunction Order and which is listed at Schedule 3 site number 84. Two officers from the Private Sector Housing Team visited the site and spoke to the occupants who confirmed that there were no welfare or health needs requiring them to be there. The occupants of the land were not Defendants named on the Injunction Order. By this time, the Injunction Order had been modified as a result of the Order made by Mr Justice Nicklin on 23rd May 2021 discharging the power of arrest against persons unknown, and as the officers were unable to ascertain the full identity of the occupants, they had no alternative but to serve directions on the vehicles under s.77 of the Criminal Justice and Public Order Act 1994 (CJPO Act 1994) to vacate the land forthwith. Copies of the directions are attached at 'PR 1/1-3'. Before a Court date could be obtained, on the 4 October 2021 Officers received reports from the Council's Ground Maintenance Contractors that the encampment had moved from Dunns Close, Nuneaton to the Car Park at Riversley Park, Nuneaton, which is also a site protected by the Injunction Order and listed as site number 79 in Schedule 3 of the Injunction Order. Officers from the Private Sector Housing Team attended the site and served fresh Directions under s.77 of the CJPO Act 1994. A hearing date was arranged with the Coventry Magistrates Court for 14 October 2021. Copies of the directions served are attached as 'PR 1/4-6'.

In the meantime, reports were received from our CCTV controllers on Monday 11 October 2021 confirming that the camper vans had vacated the Riversley Park, Car Park on Friday 8 October at approximately 13.00 hours. CCTV controllers reported that rubbish bags had been left outside and under the camera and children were seen urinating up the tree in the car park. Photographs obtained from the CCTV footage showing the Camper Van and the rubbish left at the site are attached marked 'PR 1/7-12'.

However, I am informed that when the Officers attended the site to check, the site was clear; one of the vans had returned to the Riversley Park Car Park and the other had returned to Dunns Close. The occupant of the van at Riversley Car Park,

confirmed that her name was Mrs McDonagh, but the officer was unable to find out her first name and therefore could not be certain that she was one of the named Defendants on the Injunction Order. The previous hearing date had been vacated and a new date had to be arranged for the 18 October 2021.

A few days before the hearing, the officers revisited both sites and confirmed that both vans had vacated the land at Riversley Car Park and Dunns Close on or around the 15 October and had left the Borough. The hearing on the 18 October was vacated.

- x) On 20 October 2021, reports were received from our Grounds Maintenance Contractor, that caravans were attempting to get onto land at Stanley Road play area, which is a site protected by the Injunction Order and which is listed at Schedule 3 of the Injunction Order as site number 3. The gate to the site had been opened by the travellers and one vehicle was on the site. Before other vehicles could enter the site, it had been blocked by the Contractor with a tractor. A police incident was raised (incident no 116/20/10/2021) and officers attended the site to ensure the safety of the staff. The caravans were moved on by the police and our contractors were able to return to the site and secure the gates.
- xi) On 25 April 2022, reports were received that a group of 8 caravans had entered the Miners Welfare Park, which is a site protected by the Injunction Order and which is listed at Schedule 3 as site 51. Our grounds maintenance contractors confirmed that access had been gained by allegedly breaking the lock on the gated entrance by the Black Bank on the Friday evening, 22 April 2022. The Police were informed of the of the encampment as there was likely to be an impact on events that had been organized at the park, including two scheduled football matches, an ecological survey for bats in respect of the redevelopment project at the leisure center and a major event planned in the park relating to the 'Coventry City of Culture Celebrations', whereby the Production Company 'Sanctuary' were due on site at the park on the Wednesday to build a giant wicker man style statue which visitors could attend and leave messages for loved ones as a memorial between 21st May to 28 May when the statue was to be set alight in a special ceremony.

After consultation with the Police, a notice pursuant to s.61 of the CPO Act 1994 were served on the encampment on 27 April to enable the above events to proceed. I am aware that this placed strain on the Police as at the time they were also dealing with protests at Kingsbury in relation to the fuel crisis and their resources were extremely limited.

The directions required the encampment to move from the site within 24 hours. However, when the police visited the next day, the travellers were still on site and 2 further caravans had joined the group. Discussions took place between the police and the travelling group members, and they agreed to move by 12.00 noon on the 28 April 2022; however, they failed to vacate the land as agreed. Unfortunately, due to the lack of resources the police were unable to take enforcement action immediately and the encampment remained on the site until the following day when the police officers re-visited the site with extra resources and spent the whole day persuading the occupiers to leave the site. A tow truck had to be arranged at a cost of £280. As well as putting a strain on already limited Council and Police resources, this encampment caused disruption to the above events.

- xii) On 13 June 2022, the Council received information from the local newspaper that there was an encampment at the Jubilee Leisure Centre. This is a site currently protected by the Injunction Order and which is listed at Schedule 3 as site number 18. On making further enquiries, our parks team received confirmation from our grounds maintenance contractor who had been out on the site that there was 1 caravan on the site and they had spoken to a young boy who had informed them that they were travelling alone. Our Private Sector Housing Team arranged to attend the site with the Police the following day to carry out a welfare check and speak to the occupants. On arrival it was noted that the caravan had already left the site. The rubbish had been bagged up and left to one side in the car park.

Impact of the Injunction Order

7. Even taking into account the pandemic, and the reduction of traveller movements in that time and how that may have contributed to the reduction in encampments in the Borough, there is a clear indication from the above information that the Injunction Order has been instrumental in reducing the number of encampments in the Borough. In particular:
 - a. It is clear that the frequency of unauthorised encampments has decreased since the making of the Injunction Order. As referred to in my statement in support of the Injunction Order dated 19 February 2019, in the period 2015 to 2019 there were 103 encampments in the Borough, 80 on Council owned land, 6 on the 2nd Claimants land and 17 on private land. However, since the grant of the Injunction Order in March 2019, there have been only 12 unauthorised encampments on Council Land and approximately 17 on private owned land, which our Private Sector Housing Team were notified of and which were dealt with directly by the land owners. Exhibit 'PR1/13;
 - b. It is clear that, when unauthorised encampments were formed, those encampments often moved on swiftly once the Injunction Order and the consequences of breaching that Order were explained to those occupying the relevant land.
8. As the frequency of the encampments has decreased, and also the duration of those encampments when they do occur has shortened, it is consequently the case that the incidents of fly-tipping, litter, human and dog fouling on the parks and open spaces, and the anti-social behavior at the leisure centers linked to unauthorized encampments have also decreased. Consequently, there has been a reduction in the harm suffered by the inhabitants of the Borough, and also a significant reduction in the costs incurred by the Council in managing (and cleaning up after) the unauthorised encampments (a matter upon which I expand below).
9. Crucially, the Injunction Order has given the Council and the Police the ability to deal with unauthorised encampments in a proactive and efficient manner without incurring additional costs in court fees and clearing and cleansing the areas after the encampment. The Court is respectfully reminded that the Council and the Police have only limited resources, and it is of

great assistance that those limited resources are not drained by dealing with the unauthorised encampments, as they once were.

Provision for Gypsy & Traveller Sites in the Borough

Existing provision

10. The Borough Council undertook a review of its provision for Gypsy & Traveller Site requirements in 2021. The results of the 2021 Gypsy & Traveller Accommodation Assessment (GTAA) have been incorporated into the Council's draft Gypsy & Traveller Site Allocations DPD attached as 'Exhibit PR 1/14-37'.

11. The current position, as set out in the DPD is that the new GTAA advises that, with the current occupied and vacant pitches within the borough, there is a need for 16 additional residential and no transit pitches to meet the needs of those who meet the definition of travellers as set out in the Planning Policy for Traveller Sites, August 2015.

Current plan

12. The site requirements are divided into two time periods: pre-2025 & 2025 – 2031 (which is the current Local Plan period). Table 2 on page 6 of the DPD demonstrates that the current need is met comfortably from both turnover of existing sites and the proposal to increase occupancy on two existing sites.

Future provision

13. In connection with the period 2025/26 to 2036/37 there is a potential shortfall of 2 pitches. However, there is a proposal to extend an existing site (GTSA3 – Winter Oak (see page 30 of Exhibit 'PR 1') within the Borough which will generate at least 5 additional pitches. There will, therefore, be no unmet need within the Borough between now and 2035/37.

Council Procedures for responding to Unauthorised Encampments

14. The Council deals with unauthorised encampments in accordance with the 'Dealing with Unauthorised Encampments in Warwickshire Protocol 2017'. This is a joint protocol produced by the Warwickshire Police & Crime Commissioner and is attached as 'Exhibit PR 1/34-53'.
15. This Protocol includes consulting with the Police and all relevant agencies and authorities to ensure that the right action is taken and the response is proportionate.
16. Locally, the Council's procedure used by Council Officers is attached as 'Exhibit PR 1/54'. This sets out the standard procedure, including the need to take welfare considerations into account, prior to any formal action.

Financial Impact of Unauthorised Encampments since March 2019

17. The Council have previously spent a total of £64,000 during 2012-2015 on target hardening measures in order to protect Council owned land. The concrete blocks used to protect the car parks and open spaces are on hire at a monthly cost of £660. Additional costs are incurred by the Council to remove those blocks, and replace them, every time there is an event such as a fair or football match etc. that requires site access. To date, the total costs of the concrete blocks is £9525.
18. Furthermore, while there has been a reduction in the court costs of seeking orders for removal in the Magistrates Court under the CJPO 1994, the Council has incurred significant legal costs in these injunction proceedings so far. A table showing the costs incurred over the last three years is as below.

Sum of Amount	Column Labels				Grand
Row Labels	2018/19	2019/20	2021/22	2022/23	Total
Court Costs	3,410	32,924			36,334
Removal Of Travellers	5,983	3,980	735	280	10,977
Grand Total	9,393	36,903	735	280	47,311

19. There is concern that if a final Injunction is not awarded, unauthorised encampments will occur much more frequently and for longer periods of time (as indeed they used to before the grant of the Injunction Order). This will result in increased costs, distress and inconvenience to local residents. Therefore, there is clearly still a need for an Injunction, and a final injunction order is therefore sought.

Conclusion

20. The Injunction Order has dealt with unauthorised encampments to very good effect. The significantly reduced frequency of the encampments, and the reduced duration of encampments that do occur, has reduced the environmental and public health impact of those encampments, and the costs incurred by the Council in managing unauthorised encampments.

Statement of Truth

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



Philip Richardson
Director of Planning and Regulation

Dated

27/7/22

Statement on behalf of the Claimant
 Philip Richardson Sixth Statement
 Exhibit 'PR1'
 Dated: 27th July 2022

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No. QB-2019-000616

B E T W E E N :

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE BOROUGH
OF NUNEATON AND BEDWORTH

Defendants

Exhibit 'PR 1'

CI 1

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO INADVERTENT CAMPER TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

Including (name(s)) *White Ivaco Van B058 RHX*

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

Dunn's Close

Nuneaton

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

on

20

and not return.

Dated *13th October 2021*

[Signature]

Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to ask an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

CZ 2

**NOTIFICATION AND EVICTION NOTICE BY BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994**

TO ALL OCCUPANTS OF VEHICLE

including (names)

White Ford Transit BJ64 BK12

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

Nuncaton

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

on

20

and not return.

Dated 1st October 2021



Authorised Officer on behalf of Hinckley and Rugby Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

C73

NUCLEON AND BUCKINGHAM BOROUGH COUNCIL
NOTICE TO EVICT GREEN CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

White Ivco Van BD58 EHX
 White Ford Transit BJ64 BKK

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

Duns Close
 Nucleon

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

on

20

and not return.

Dated

13th October 2021

APPROVED FOR THE COUNCIL BY THE COUNCIL

Authorised Officer on behalf of Nucleon and Buckingham Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

Signature of authorised officer

1008/1202

CI 1

NUCLEON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

Including (motor(s))

White Transit B574 B1016

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

Kiversky Park car park

Nucleon

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

on

20

and not return.

Dated

Authorized Officer on behalf of Nucleon and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

1000/1202

as specified in the relevant legislation

CI 2

MIRACASTON AND BEDFORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED PERSONS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

White Iveco van BD58RHX

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

Primary Park Car Park

Miracaston

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

on

20

and not return.

Dated

by

Authorised Officer on behalf of Miracaston and Bedfordshire Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

1000/1202

C I 3

NUREATION AND REDWORTH BOROUGH COUNCIL
NOTICE TO DRIVERS NOT TO LEAVE A
VEHICLE ON ROAD, HIGHWAY AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

Including (name(s))

White Ivaco van BD58 LHX

White Transit BJ64 BIKK

TAKEN NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

Kingsley Road, Nureaton

Nureaton

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

on

20

and not return.

Dated

14 October 2021

 Authorised Officer on behalf of Nureaton and Redworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

1802/1202













Gypsy and Traveller Site Allocations DPD

Publication consultation draft



Nuneaton and Bedworth Borough Council

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1.0 Introduction

- 1.1 Nuneaton and Bedworth Borough Council adopted a Borough Plan on 11th June 2019 which planned for new development in the borough until 2031. The Borough Plan plans, principally, for new commercial, employment, and residential uses. In terms of residential uses the Borough Plan must plan for all parts of the community and thus deals with provision for gypsies and other travellers.
- 1.2 Policies DS4 – Overall development needs and H3 – Gypsies and Travellers set out the need for new pitches by 2031/2032 to be at least 39 residential and 5 transit pitches. Policy H3 does not set out where the new pitches would be provided but sets out the criteria that will be used to identify potential locations for residential and permanent pitches through the Gypsy and Traveller Site Allocations Development Plan Document (DPD). It is through this DPD that land would be identified and allocated for future traveller sites.
- 1.3 The current Local Development Scheme (2020) sets out the timetable for the production of Gypsy and Traveller Site Allocations DPD which is as follows:
 - May 2021 – consultation on an Issues and Options document;
 - January 2022 – consultation on a publication document;
 - July 2022 – submission of the document to the Secretary of State;
 - January 2023 – receipt of Inspector's report on the examination of the document; and
 - February 2023 – adoption of the document.
- 1.4 This document is the Publication draft of the Gypsy and Traveller Site Allocations DPD; this is the formal document as required by Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. A consultation on the previous version of the Gypsy and Traveller Site Allocations DPD, the Issues and Options consultation draft, took place between 11th June 2021 and 6th August 2021. This document was that required by Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. A consultation statement has been produced which sets out the responses received and how they have been considered in producing this next version of the DPD.
- 1.5 The document is set out in five subsequent chapters addressing the vision and objectives of the DPD, followed by the need for new pitches, the locations of these new pitches, a monitoring schedule for the DPD, and a conclusion.
- 1.6 To support this document the Council has commissioned a consultant to produce a new Gypsy, Traveller, and Travelling Showpersons

Accommodation Assessment (GTAA) and this can be viewed alongside this document. The most recent study prior to this new GTAA dates from 2016 and it concluded that the evidence base is refreshed on a five-yearly basis to ensure that the level of pitch and pitch provision remains appropriate. The DPD is also supported by a 'Site Assessments and the Green Belt' document, a Sustainability Appraisal Report, and an Appropriate Assessment, the contents of which have been considered in the production of this DPD. All supporting documents can be seen on the Borough Council's website alongside this DPD as part of the formal consultation.

2.0 Vision & Objectives

Vision

- 2.1** The vision was contained within the Issues and Options consultation draft of the DPD. Since that document the vision has been amended so that reference to the environment is made thereby linking the vision more to objective 3.
- 2.2** The vision for this DPD is for the needs of the travelling community in and visiting the borough to be provided with sufficient pitches so that they can live, work, and rest in the borough. Pitches will be well located and integrated into the environment and the local community thereby providing good access to essential services.

Objectives

- 2.3** The following objectives will help achieve the vision for the DPD. Three objectives were consulted upon and although no issues were raised by consultation responses on the content of the objectives, objective 3 has been amended. The intent of the objective remains the same, but the terminology has been changed so that it aligns better with the language used in the adopted Borough Plan.

Objective 1 - to provide sufficient pitches for the needs of the travelling community.

Objective 2 - to provide provision in sustainable locations with good access to local services.

Objective 3 - to provide provision in such a way that the local environment is protected and, where appropriate, enhanced.

These objectives are interrelated and in combination they will contribute to realising the vision for the DPD.

3.0 Need

Introduction

- 3.1 The evidence base that supported the formation of the need for new pitches in the Borough Plan was the 2016 Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA). Since the 2016 GTAA was produced the 2016 Housing and Planning Act introduced the need to conduct a wider assessment of all caravan and houseboat accommodation needs, not just those from Gypsy and Traveller ethnicities. A new assessment of accommodation needs has been produced, dated from 2021. This assessment updates the need for new pitches to those published in the Borough Plan and addresses the implications of the 2016 Housing and Planning Act.
- 3.2 The Issues and Options consultation proposed four options for the number of pitches to provide ranging from that in the 2021 GTAA through to figures above those in the GTAA from 2016 (and published in the Borough Plan). After careful consideration it is considered that the figures from the 2021 GTAA should be used as the basis for the need. Even though representations on the DPD were low, the newer figures were clearly preferred over those that were now nearly six years old by respondents. Not only are these figures more recent, but the interview rate was also much higher giving greater confidence that the assessment of need is more robust and closer to that actually required. These four options were assessed in the accompanying sustainability appraisal to the Issues and options document and these four options all came out the same, partly because all reasonable options considered would achieve the number of pitches set in the 2021 GTAA as a minimum (which is the most recent data source) but also because there were many unknowns of the likely impacts that would result from these different sets of figures for new pitch numbers.
- 3.3 Using the requirement for new pitches from the 2021 GTAA as a minimum rather than the higher figures in the extant Borough Plan means that this document will need to supersede the requirements for new pitches set out in Policies DS4 and H3 of the Borough Plan. The Borough Plan is being reviewed and these policies will be looked at, but this process is running behind this document so for an interim period the policy on need in this document will have to take precedence over that in the adopted Borough Plan.

Gypsies and Travellers

- 3.4 The first part of the 2021 GTAA was to assess the current occupancy of pitches within the borough, then to assess how much capacity remains above this, so, how many pitches are unoccupied but are available, followed by calculating how many more pitches are needed to fulfil the need for new pitches within the borough. The new GTAA advises that with the current occupied and vacant pitches within the borough there is a need for 16 additional residential and no transit pitches to meet the needs of those who meet the definition of travellers as set out in the Planning Policy for Traveller Sites, August 2015; this increases by four to a total of 20 additional residential pitches to meet a cultural need (that is, people who do not meet the definition of a traveller but nevertheless live on pitches). For travellers, this is change of 23 residential pitches and 5 transit pitches from those figures published in the Borough Plan (both decreasing). Table 1 below repeats the figures from Table 6.3 of the 2021 GTAA in which the need for new pitches is set out.

Table 1 - Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37.

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Longer-term need		
<i>Over period 2026/7 to 2030/31 (B)</i>	4	3
<i>Over period 2031/32 to 2036/37(C)</i>	8	7
<i>Longer-term need TOTAL to 2036/37 (12 years) D=(B+C)</i>	12	10
NET SHORTFALL 2021/22 to 2036/37 (A+D) (11 years)	20	16

PPTS = Planning Policy for Traveller Sites (2015) within which the definition of gypsies and travellers is provided.

- 3.5 The 2021 GTAA assumes that some of this provision for additional pitches can be found through turnover on the site at The Grifff and by a combination of intensification and expansion of three existing sites to provide 11 pitches. Table 2 below repeats the figures from Table 6.4 of the 2021 GTAA which sets out these assumptions. Thus, the table shows that through the provision of 11 new additional pitches the need up to 2036/37 is met is and, therefore, this meets the need evidenced in the 2021 GTAA.

Table 2 - Addressing Gypsy and Traveller pitch need.

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Anticipated minimum turnover on council site (B)	7	7
Potential intensification/expansion of existing sites (C)	6	6
Residual need 2021/22 to 2025/26 after turnover and potential intensification/expansion (D) = A-B-C	-5 Need met	-7 Need met
Longer-term need 2026/27 to 2036/37 (E)	12	10
Anticipated minimum turnover on council site (F)	15	15
Potential intensification/expansion of existing sites (G)	5	5
Residual need 2025/26 to 2036/37 after turnover (H) = E-F-G	-8 Need met	-10 Need met
Residual need 2021/22 to 2036/37 after turnover and potential pitch development considered (I) = D+H	-13 Need Met	-17 Need met
Summary	Cultural need	Of which: PPTS NEED
Plan period Authorised Pitch Shortfall (2021/22 to 2036/37) (J) = A+E	20	16
Anticipated minimum turnover on council site (K) = B+F	22	22
Potential intensification/expansion of existing sites (L)=C+G	11	11
Residual need 2021/22 to 2036/37 after turnover (M=J-K-L)	-13 Need met	-17 Need met

- 3.6 Although turnover has been considered and has the potential to meet need based on past trends, this cannot be wholly relied upon as the future level of turnover at The Griff is not guaranteed. Instead, turnover is one element of supply but there remains a need to take positive steps to increase the number of pitches available to households across the borough to meet the needs identified and to plan positively for the area. This is particularly important for the Council to achieve a 5-year land supply of new pitches. So, turnover can be relied upon to meet some of the forecast need but not to the exclusion of allocating new pitches. The GTAA of 2021 identified 11 pitches that could be found in the Borough and this should be used to form the basis of the minimum new pitches to provide, the remainder will be met by turnover.

Travelling Showpeople

- 3.7 The GTAA from 2021 states that there is 1 occupied and 3 vacant pitches in the Borough for use by travelling showpeople. The 2016 GTAA set out that there were 4 private owned pitches, and plots on site/yards of which 4 were occupied and 0 were vacant. Therefore, plot numbers have remained the same but vacant plot numbers have increased. No additional provision is recommended by the current GTAA.

Bargee Travellers

- 3.8 In the 2016 GTAA bargee travellers were accounted for by one family present in the borough. No change to bargee traveller numbers are contained within the updated GTAA.

Future Need

- 3.9 In the 2021 GTAA it is recommended that the *"...evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth."* This is an important element of confirming that the need in this DPD remains as required. The update of the GTAA is referenced in Table 3 of Chapter 5.0 on Monitoring of this document. Should need be found to have changed beyond that set out in this DPD (or indeed for another reason such as undeliverability of a site or sites) then this should trigger a review of this DPD.

Strategic Policy GT1 – Overall Need

The following levels of development will be planned for and provided within Nuneaton and Bedworth Borough between 2021/22 and 2036/37:

- At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025/26; and
- At least a further 5 permanent residential pitches beyond those required by 2025/26 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2036/37.

4.0 Location of Pitches

Introduction

- 4.1 Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt and Green Belt forms a large part of the borough. The Green Belt is mostly located to the south of Nuneaton, but also surrounds the main areas of Bedworth, Bulkington, and Ash Green. Nationally, the government attaches great importance to the Green Belt. The five key purposes of Green Belts are:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.2 Alterations to the Green Belt boundary are only approved in exceptional circumstances and must be done during the local plan making process. In reviewing land to be released from the Green Belt for development, the exceptional circumstances should be weighed up against any potential adverse effects on the overall integrity of the Green Belt, according to an assessment of the whole of the Green Belt based around the five purposes set out above. Traveller sites are inappropriate development in the Green Belt. Furthermore, subject to the best interests of the child, personal circumstances, and unmet need traveller sites in the Green Belt are unlikely to clearly outweigh harm to the Green Belt.
- 4.3 Notwithstanding the above, of all the occupied pitches, and plots on site/yards for gypsies and travellers all but one (that at Watling Street) are within the Green Belt including the local authority provision at Griff. The travelling showperson's yard is also outside of the Green Belt.
- 4.4 Beyond the issue of the Green Belt, which is a significant matter, there are other factors that may need consideration for the locating of new gypsy and traveller pitches. Sites should have good access to services, such as shops, schools, GP surgeries, and pharmacies, and this access should be capable of being done by modes of transport other than private car. Walking is the easiest and cheapest way to access services and thus is the focus for accessibility. However, many of the current sites are limited by their options for modes of travel.

- 4.5 Sites should also avoid locations that would impact upon land that has been designated for its interest, so, sites of ecological, heritage, or geological value. Similarly, contaminated land, land prone to flooding, and land in a sensitive landscape should also be avoided. These and other criteria for selecting new gypsy and traveller sites are set out in Policy H3 - Gypsies and Travellers of the current Borough Plan.

Locational Strategy

- 4.6 The fundamental purpose of the Gypsy and Traveller Site Allocations DPD is to allocate land to provide for the number of pitches identified as the need by 2036/37. The Issues and Options consultation draft proposed four strategies for allocating new pitches. These were all assessed within the accompanying sustainability appraisal and two of the options were found to be the most sustainable, namely the following:
- A. Seek to allocate new pitches firstly within the permitted area of existing sites and/or adjacent to these sites, then based on walking distances to services, and then by existing Policy H3.
 - D. Seek to allocate new pitches firstly within the permitted site area of existing sites, then adjacent to these existing pitches, then based on walking distances to services. Use existing Policy H3 only once sites have been allocated by any of the other means and then only if insufficient has been allocated.
- 4.7 Respondents to the issues and options selected only options A and D – with an even split of numbers to these two options from respondents. Options A and D – the first difference is that option A uses extant Policy H3 to assess sites at the outset whilst option D only uses extant Policy H3 once insufficient sites have been found via other means. The second differences is that option D separates out the permitted areas of existing sites from land adjacent to existing sites whereas option A does not and treats them together. It is considered that option D should form the basis of the allocation of new pitches as it allows for the consideration of the permitted site area of existing sites first (and in isolation) and this has the potential for the least impact. However, in hindsight, the use of the word 'adjacent' could give rise to some ambiguity and the word 'adjoining' will be used instead to emphasise that there should be a physical relationship between the new and the existing. Also, another benefit of using option D is that Policy H3 is only used as a fallback if insufficient pitches have been found via other means rather than from the outset. It should be noted that should planning applications be made for new pitches on unallocated sites then the strategic policy in this DPD would be used as the starting point to assess their suitability.

- 4.8 In terms of walking distances to services a number of different ways in which this could be measured were suggested in the Issues and options document and these ranged from 2-3 miles for school to 800 metres to a town centre. The intermediate distance was 1.6 kilometres to GPs (General Practitioners) and pharmacies. Given the above range of different ways to measure walking distances to specific services and that, ideally, access should be all of these, it seems a good compromise to use the intermediate distance, and this shall be used within the strategic policy.
- 4.9 Based on the above the strategy is a tiered approach whereby land that is being developed for new pitches will be assessed against the three priority land uses. In terms of allocations, land will be allocated in the order set out in the policy so that the priority will be to allocate land that meets priority one in the first instance. If insufficient pitches to meet the Borough's needs are found to be acceptable then land use priority two will be used and then land use priority three. If insufficient remains allocated, then Policy H3 will be used. In terms of planning applications these are standalone parcels of land that cannot be dealt with by the same process and, thus, any of the three priority land uses would be acceptable subject to all other matters of the proposal being found acceptable. Policy H3 of the extant Borough Plan is only utilised if there is insufficient provision to meet the identified need for new pitches.

Strategic Policy GT2 – Strategy

Planning permission will be granted for new gypsy and traveller pitches subject to compliance with other policies of the development plan and in the following priority land uses:

- 1) within the permitted area of existing lawful, authorised gypsy and traveller sites;
- 2) then land adjoining the permitted area of existing lawful, authorised gypsy and traveller sites;
- 3) then land within 1.6 kilometres of appropriate services, such as schools, GP surgeries, shops, and these services being capable of being accessed safely by foot.

If there is insufficient provision to meet the minimum needs identified in Strategic Policy GT1 – Overall Need then extant Policy H3 – Gypsies and Travellers of the Borough Plan will be used to determine the acceptability of the new development.

Allocation of Sites

- 4.10** Using the strategy above as the basis for allocating new pitches, the starting point is within existing sites. The 2021 GTAA identified two privately owned sites within the Borough which had the potential to accommodate new additional pitches within their existing approved extent. These are Winter Oak, Watling Street, Nuneaton and Sunrise Cottage, Mile Tree Lane, Bulkington. The GTAA indicated that these could accommodate up to 11 additional pitches. These have been independently assessed and it was concluded that they could accommodate 9 additional pitches without detriment to the existing occupiers. The sites have also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in these locations (this can be viewed in the 'Site Assessments and the Green Belt' document).
- 4.11** The 2021 GTAA also identified another site that had the potential to accommodate new pitches but this through the physical expansion of the site. This was the privately owned site at Fella's Acre, Mile Tree Lane, Bulkington which it was considered could accommodate an additional two pitches. This was also independently assessed and following this the site was deemed to be unsuitable for expansion - mainly relating to deliverability. However, the landowner expressed an interest in developing another site for new pitches, namely The Old Nursery, Parrotts Grove, Coventry. This has been independently assessed and it was concluded that the site could be developed to provide five to six new pitches. The site has also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in this location.
- 4.12** This site does not meet the three bullet points of Strategic Policy GT2 - Strategy but the policy allows for sites in other locations that accord with Policy H3 where the need set out in Strategic Policy GT1 - Overall Need has not been met. The other two sites would provide nine pitches, leaving a shortfall of two pitches to meet the identified need. An assessment of the site against Policy H3 has concluded that the site would be acceptable for allocation. The number of pitches provided by the three sites found acceptable for allocation would provide 14-15 pitches which would, firstly, meet the minimum 11 pitches required and, secondly, build in some resilience should the anticipated levels of turnover at The Griff not take place.
- 4.13** To support the production of this document the Council ran a call for sites between 17th September 2021 and 22nd October 2021 which included gypsy

and traveller sites. No sites were put forward for this type of use as a result of this call for sites. Therefore, the three assessed independently for the Council remain the only sites for consideration.

- 4.14 Further to the independent assessment and the Council's 'Site Assessments and the Green Belt' document the sites (and the policies) were assessed in the Sustainability Appraisal Report and the Habitats Regulations Assessment. This latter document is a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The Habitats Regulations Assessment concludes that due to the location of the allocated sites and the general absence of realistic linking impact pathways that there would be no likely significant effects on either Ensor's Pool Special Area of Conservation (SAC) or the River Mease SAC either alone or in combination.
- 4.15 The need for new gypsy and traveller pitches set out in Strategic Policy GT1 – Overall Need is for at least 11 permanent residential pitches to accommodate Gypsies and Travellers. The sites that have been found acceptable to allocate would provide up to 15 pitches at three locations and these are set out in Policy GT3 – Site Allocations. Below the policy an accompanying plan is provided showing the area to which the allocation relates. Two of the sites are within the Green Belt, namely Sunrise Cottage and The Old Nursery, and these have been found to meet the terms of exceptions and thus allowable development in the Green Belt. The extant proposals map will need to be updated to remove these two sites from the Green Belt.
- 4.16 As a result of the assessments of the sites a number of matters are considered important for any subsequent planning application to address and these have been set out as key development requirements in the relevant policy. The basis of these principles are the responses received during the informal consultation with key technical stakeholders on the three sites (the details of which can be viewed in the supporting 'Site Assessments and the Green Belt' document) and analysis of the site's context.
- 4.17 It is considered that to make additional use of the accesses at The Old Nursery and Sunrise Cottage sites some key development principles are required to ensure the use of the access is safe. Related to this is a requirement to ensure any new layout encompasses suitable bin storage to ensure these do not end up being stored outside the site. The sites have been assessed against the Wildlife Assessment Check tool as advised by the Open Spaces and Green Infrastructure SPD and in all cases a Preliminary

Ecological Assessment is required to ascertain if further ecological survey work is required. The sites of Winter Oak and The Old Nursery both have boundary hedgerows and these help in reducing the site's impact on the local landscape and, thus, any development of the site should not result in these being affected.

- 4.18 The 'Designing Gypsy and Traveller sites: good practice guide' of 2008, although withdrawn on 1st September 2015 and replaced by the 'Planning policy for traveller sites' document remains a useful guide setting out broad principles to consider in traveller and gypsy sites. With regard to communal recreation areas for children the good practice guide set out that it is considered that such areas should be provided where suitable provision is not available within walking distance on a safe route or using easily accessible public transport.
- 4.19 The Independent assessment of the sites highlighted that the site at Sunrise Cottage already had provision of a small play area within the site. The Winter Oak site does not but on the other side of the A5 land is being developed for residential uses (reference 034076) which includes a play area, and this would be accessible nearby and thus provision within the site is not considered essential. However, the new site at The Old Nursery has no obvious communal play area in proximity to it and, thus, should be provided within the site – the Independent assessment set out that there was sufficient space to accommodate it.
- 4.20 The matter of flooding is not addressed because at this time it is not considered to be relevant as sites are in flood zone 1 and there is no indication that they suffer inundation. However, areas prone to flooding change and should this then be the case extant Policy NE4 – Managing flood risk and water quality would be used. Similarly, sewage connection is not a key development requirement as this is already addressed by bullet point number 9 of extant H3 – Gypsies and Travellers.

Policy GT3 – Site Allocations

Planning permission will be granted for new gypsy and traveller pitches at the following sites and as denoted with a solid red line on the accompanying site plans:

GTSA1 – Sunrise Cottage for three additional pitches within the existing site as shown as a solid red line on the accompanying plan.

GTSA2 – The Old Nursery for five to six new pitches within the site as shown as a solid red line on the accompanying plan.

GTSA3 – Winter Oak for six additional pitches within the existing site as shown as a solid red line on the accompanying plan.

Key Development Requirements

Planning applications at the allocated sites shall contain the details as set out below:

GTSA1 – Sunrise Cottage

- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.

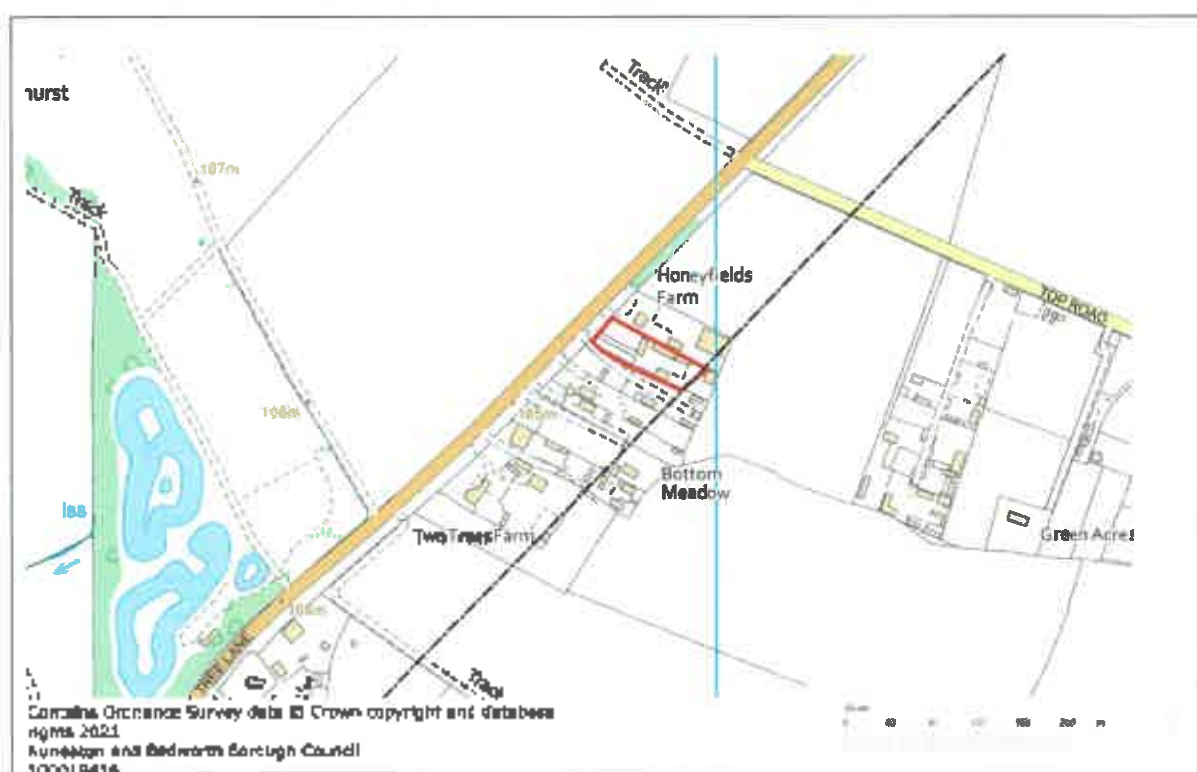
GTSA2 – The Old Nursery

- Closure of the northern access within the site.
- Access to be made in and out of the site from the southern access within the site.
- Configuration of an access that allows for sufficient manoeuvring room for any vehicles entering/exiting the site.
- Any gates within the access to be setback sufficient distance to allow any vehicle entering the site to exit the highway completely whilst the gates are opened or closed.
- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Landscaping of the site boundary to soften the appearance of the pitches from external views.
- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.
- Provision of communal play area within the site.

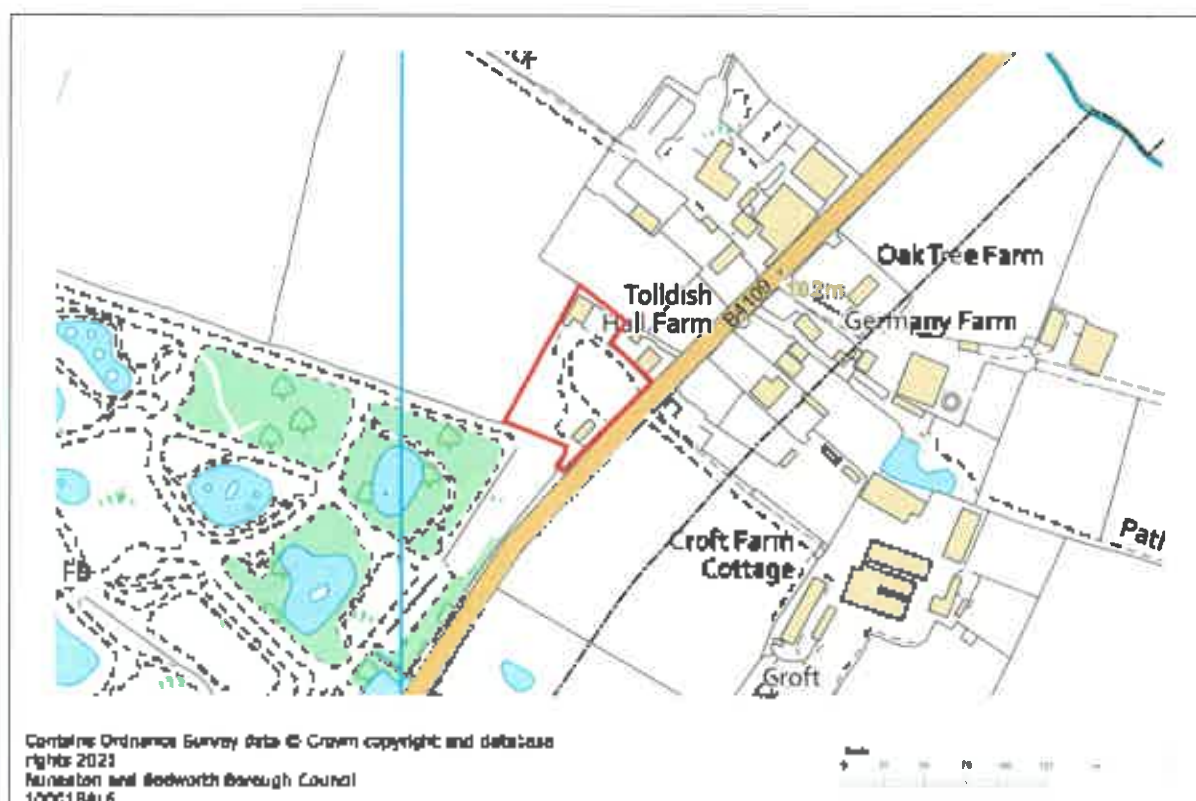
GTSA3 – Winter Oak

- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.

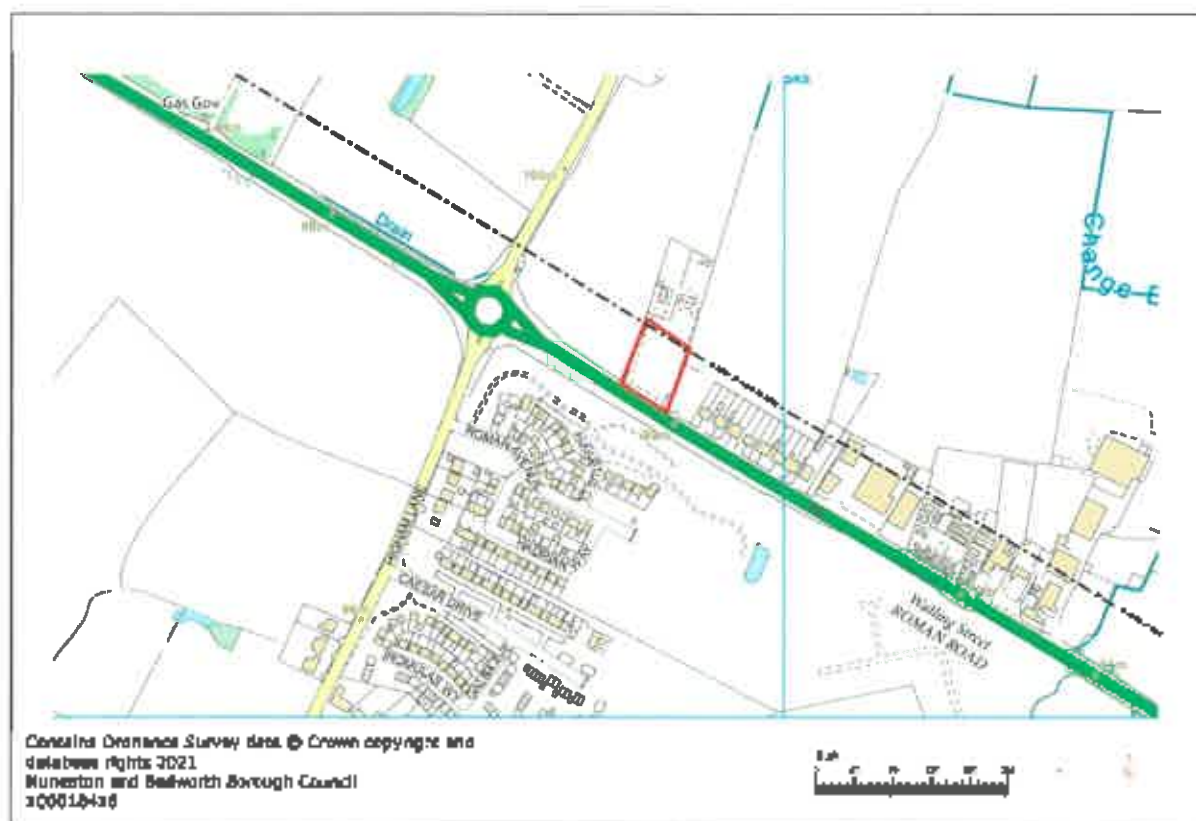
GTSA1 – Sunrise Cottage



GTSAZ – The Old Nursery



GTSA3 – Winter Oak



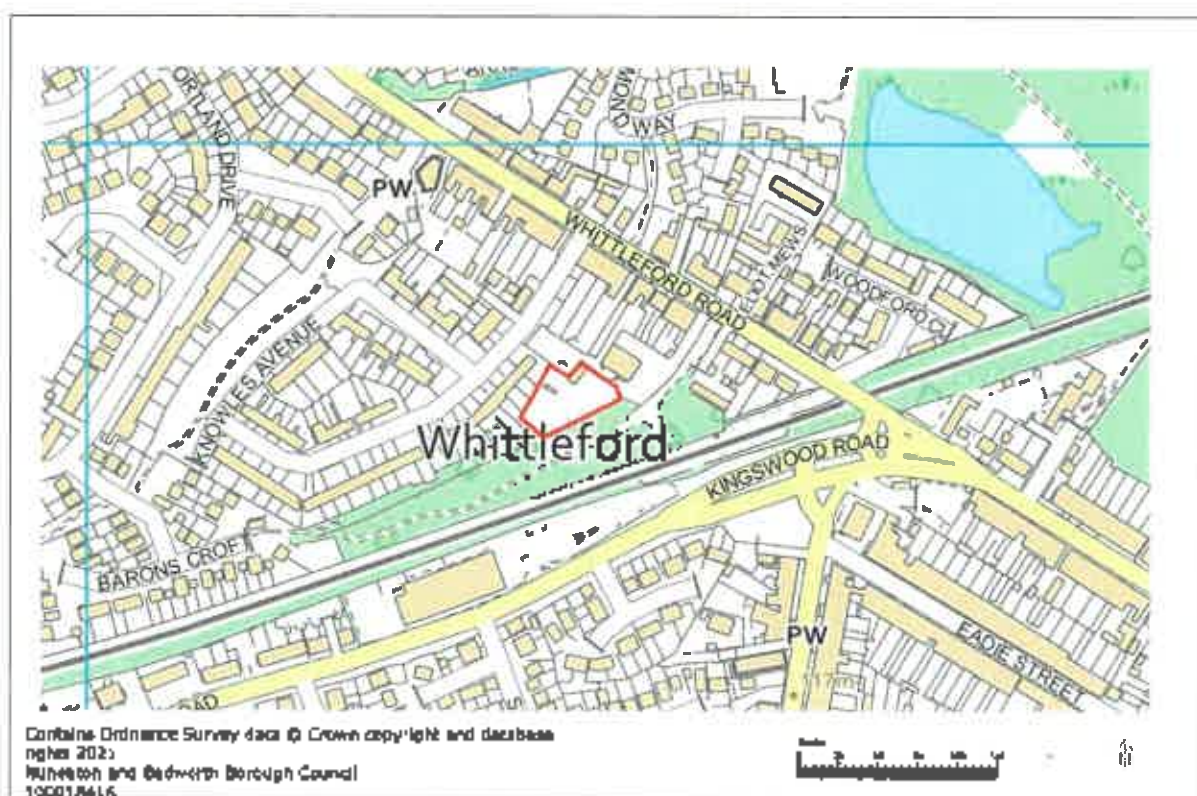
- 4.21 As well as the allocation of sites for new gypsy and traveller pitches the Council has considered the ongoing need for a travelling showperson's yard within the Borough, currently at Spinney Lane/Whittleford Road, Nuneaton. This is the only such type of accommodation in Warwickshire and thus has considerable importance to the County as an asset and also by ensuring continuity and availability of these plots within the Borough it contributes towards provision. The Issues and options consultation document proposed the safeguarding of the site for its current use given its special status in the County. Comments were sparse on this matter, but no responses were received stating that safeguarding of this site for this purpose was incompatible with surrounding land uses or unacceptable. The Habitats Regulations Report and the Sustainability Appraisal Report both conclude that there would be no significant adverse impacts from the identified land continuing to be used for its current use.

Policy GT4 – Site Safeguarding

The travelling showpeople site at Spinney Lane/Whittleford Road, Nuneaton as denoted on plan GTSA4 with a solid red line will be safeguarded for use by travelling showpeople.

Alternative uses will be permitted if it is proven that either there is no longer a requirement for travelling showpeople accommodation or that an alternative site for travelling showpeople is available within Warwickshire.

GTSA4 – Spinney Lane/Whittleford Road, Nuneaton



5.0 Monitoring

- 5.1 The Council produces annually an Authority Monitoring Report (AMR). Within the AMR the performance of the policies in the Borough Plan are reported as well as those in other DPDs (Development Plan Documents). Therefore, the AMR will need to report on the policies of the performance of this DPD once it has been adopted. Table 3 below sets out the indicators and targets that will be used to monitor the policies of this DPD.

Table 3 - Monitoring indicators and targets for the policies of the Gypsy and Traveller Site Allocations Development Plan Document (DPD).

Policy	Indicator	Target
Strategic Policy GT1 – Overall Need	Gypsy and traveller accommodation.	11 residential pitches provided.
	Monitor the continued need for additional pitches.	Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.
Strategic Policy GT2 – Strategy	Sites permitted in accordance with the policy.	100%.
Policy GT3 – Site Allocations	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report	A minimum of six additional residential pitches permitted and available for use by 2025/26 and a minimum of 11 additional residential pitches permitted and available by 2036/37.
Policy GT4 – Site Safeguarding	Monitor the use of the safeguarded site.	The identified site at Spinney Lane/Whittleford Road, Nuneaton to remain used for travelling showpeople unless it was proven to be no longer required.

6.0 Conclusion

- 6.1 The Issues and options document of the Gypsy and Traveller Site Allocations Development Plan Document (DPD) was the first stage of producing this DPD. It set out the key issues for the locating of new traveller sites, namely how many and where and the reasonable options for approaching these issues. The document contained 10 questions that the answers to helped inform this next (publication) version of the DPD.
- 6.2 This document seeks to provide for a minimum of 11 residential pitches in the borough for gypsies and travellers by 2036/37. To achieve this three parcels of land have been identified and allocated to provide at least 14 residential pitches. Also, the existing travelling showpeople site in Nuneaton has been safeguarded from alternative uses.

Appendix 1

Relationship between the policies in this DPD and the extant Borough Plan.

Superseded Borough Plan policies	Superseding Gypsy and Traveller Site Allocations DPD policies
Policy DS4 – Overall development needs (third bullet point only).	Strategic Policy GT1 – Overall Need.
Policy H3 – Gypsies and Travellers (figures contained in first sentence).	Strategic Policy GT1 – Overall Need.



Philip Seccombe
**Police and Crime
Commissioner**
for Warwickshire

The Warwickshire Protocol 2017

Dealing with Unauthorised Encampments In Warwickshire



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1. Introduction

1.1. Research and experience tends to strongly suggest that over the last four years most local authority areas in Warwickshire have experienced an increase in unauthorised encampments by Gypsy and Traveller communities. This experience has also been felt in Coventry and the West Midlands as a whole. It is probable this is due to a lack of suitable sites for prolonged stopping, population growth in the Gypsy and Traveller communities and due to members of the community continuing to practice a nomadic habit of life in accordance with their cultural identity.

1.2. This has led to increasing tensions and criticism from settled residential communities who seek effective responses from their local elected representatives. In some instances it has led to criminal and anti-social behaviours from within and outside the encampment. Consequently the effects have impacted on local authorities, private landowners, the courts and the police in terms of resource, time and cost.

1.3. This protocol is aimed at ensuring that the response to unauthorised encampments from local authorities, private landowners, the police and other salient agencies is cohesive, consistent, efficient and effective. It seeks to provide a set of shared principles and processes with clearly identified leads

1.4. Good communications and negotiation, setting clear expectations, seeking positive outcomes and being committed to challenging crime and disorder are key themes of this document. It is very important to maintain public confidence and uphold the law whilst being cognisant of the rights of the Gypsy and Travelling communities. Post encampment review is also a vital aspect of this document.

1.5. In following this protocol some key principles need to be established. The law needs to be upheld and action applied in a pragmatic, fair and balanced way. Behind all decision making should be the principles of justification, proportionality, legality and absolute necessity.

1.6. Whilst action will in most cases inevitably have to be taken, it is in a spirit of negotiation, clear communication and a partnership approach. Decision makers should take account of threat, harm and risk presented by the unauthorised encampment whilst being cognisant of issues relating to vulnerability, welfare and safeguarding in relation to members of the encampment. Ultimately decision making should take into account the needs, fears and concerns of the settled community.

2. Initial Actions

2.1. Following the report of an unauthorised encampment the information detailed within Appendix 2 should be collated upon first response to the encampment. It is the responsibility of the lead agency (see para. 2.2) to ensure this information is recorded. It is accepted it may not be the lead agency making the first response. Experience would tend to suggest it will probably be the police. However, the lead agency should ensure it is in possession of the information no later than one working day after receiving the first report of the encampment.

2.2. A positive and professional initial response is essential in setting the tone and effectiveness of the subsequent processes. It is a first priority to establish whether the land in question is owned by any of the signatories to this Protocol and if it is, that agency will be the lead agency.

2.3. Where the land trespassed on is owned privately, the district/borough local authority will offer initial advice if requested as the landowner may be inexperienced in such matters. However, it should be noted a district/borough local authority cannot make decisions for a private landowner. Distinct ownership and efficient positive action are the key steps to successful outcomes. ***It is vital the lead agency has a clearly appointed person(s) able to deal with and make decisions about the encampment.*** It is also extremely important to engage with the trespassers present at the encampment and those residing on the unauthorised encampment as the Site Code of Conduct Notice should be explained and served as soon as practicable by the lead agency or by the police on behalf of the lead agency. (See Appendix 3)

2.4. Within one to two working days an information sharing meeting should have been established to consider the views of all relevant stakeholders including the Gypsy and Travelling community. This is the responsibility of the lead agency. This may be a physical meeting, on or off site or virtual e.g. telephone conferencing, video conferencing. It is imperative that views are taken from decision makers representing all the relevant partners. A full assessment of the situation and associated risks should be made. The meeting should be documented, actions clearly identified, owned and completed. The meeting record should be shared and updated.

2.5. The Warwickshire County Council Gypsy and Traveller Liaison Team will ensure a document is created on ECINS for every unauthorised encampment. This is in order for the lead agency to log all salient information about the unauthorised encampment, such as, strategy, meetings, discussions, decision making and rationale. The log may also incorporate the Warwickshire Police Site Assessment document that is created by the police. This will be at the discretion and judgement of the Warwickshire Police Gypsy and Traveller Liaison Officer.

2.6. The meeting should clearly define the planned way forward for the next 48 hours whether leading to a scheduled eviction or a tolerated trespass arrangement. The plan should be revisited and revised regularly according to need. A significant incident on the site or raised tensions in the local settled community should give cause to conducting an early review.

2.7. Key issues to take into account are the intentions of the Gypsy and Travelling community, their actual behaviours, any welfare issues and the potential for criminal or anti-social activity associated with the unauthorised encampment. It is also very important to be cognisant of any criminal or anti-social activity being perpetrated by members of the settled community towards the encampment. Such behaviours and disruption will be viewed seriously. Whether the encampment is on land that is private; residential; public or business related is irrelevant. However, it is accepted local authorities have no control over private land owners actions or decisions. Private land owners do have recourse to powers under common law to help resolve the situation.

3. Communication

3.1. Good, timely, communication at all stages of dealing with an unauthorised encampment is vital to ensuring that local residents and businesses and the Gypsy and Traveller community are aware of the actions that are being taken to bring about a positive resolution. This protocol does not seek to prescribe all communication methodologies as the circumstances of each unauthorised encampment will be different and the communications tailored to suit as necessary. However, it should be a key priority when an unauthorised encampment occurs to establish a communication strategy, owned by the lead agency and supported by the other agencies as appropriate. This will provide consistency of communications and allow for a co-ordinated response.

3.2. The lead agency will be responsible for the co-ordination of the communications activities and should ensure clear ownership is established for individual elements, though these may be delivered by other agencies. For example, a leaflet to residents might be produced by the lead agency but delivered within the local area by the police Safer Neighbourhoods Team. A suggested template for a leaflet to residents and businesses is included at Appendix 5.

3.3. It should be recognised that communication is a two-way process and, as such individuals and networks can pass back information in respect of the impact the encampment is having on the local settled communities. Such feedback should be acknowledged and documented and used by the responsible agencies to further assess the encampment and its consequences. Any criminal activity or anti-social behaviour should be reported directly to the police.

3.4. As a general principle, it is important that the public has clear information about the ways in which agencies will deal with unauthorised encampments, before, during and after they occur. This should deal not only with encampments on public/local authority land or the highway, but also provide practical information and guidance for members of the public dealing with encampments on private land.

3.5. Consistency of communication is key to ensuring that conflicting information is avoided. It is preferable that there should be one central 'hub', to which agencies can signpost the public towards and from which updates can be shared. The Warwickshire County Council unauthorised traveller sites web page at <http://www.warwickshire.gov.uk/travellerunauthorisedsites> is the suggested basis for such an information hub, particularly as it allows the public to report encampments online and then be kept directly updated on progress. Local authorities can send updates direct to the WCC Gypsy and Traveller Liaison Team who will then update the web site.

3.6. Effort should be made to communicate with key local networks and individuals who can help convey messages on behalf of the responsible agencies, including elected members. Email, website, social media and direct messaging (for example leaflets distributed to affected residents and businesses) should be considered alongside the traditional print and broadcast media as the circumstances dictate, with the aim of maximising the reach of updates. Information updates should be timely, accurate and concise and signpost towards ways in which further feedback can be given.

4. The Law

4.1. Utilising the most relevant and effective legislation for the unauthorised encampment in question is a matter for the lead agency and its legal advisors. The following, though, may help decision makers in determining the best way forward via a legal route.

- Common Law – can be used by the landowner to regain possession of the land; does not require use of a court; enforced by the landowner or private bailiffs; has no sanctions should trespassers return. This option is available to public bodies but government policy discourages its use.
- Part 55 Civil Procedure Rules – can only be used by the landowner to regain possession of the land; requires a civil court procedure; possession can be enforced by county court bailiffs; no sanctions should trespassers return unless means have been adopted to identify the persons unknown. Sanctions become unavailable after the 3 month period where the court order is valid expires.

- Sections 77 – 78 Criminal Justice and Public Order Act 1994 – can only be used by a local authority on land forming part of the Highway, unoccupied land or occupied land without the consent of the occupier; used to remove identified individuals; magistrates court required when those directed do not leave; possession enforced by local authority; return of campers and or their vehicles within three months carries criminal sanctions.
- Sections 61 – 62 Criminal Justice and Public Order Act 1994 – can only be used by police; on any land except the highway; to direct that persons leave the land and remove any vehicles they have with them or any other property and a failure to do so or a return to the land within three months empowers a Police constable to seize and remove that vehicle; it is not only triggered where there are two or more persons trespassing with 6 or more vehicles but can be triggered where there are two or more persons trespassing and that any of those persons trespassing has caused damage to the land or to property on the land or where they have used threatening, abusive, insulting words or behaviour towards the occupier of the land, a member of the occupier's family or an employee or agent of the occupier; does not require the courts; possession enforced by police; return within three months – criminal sanctions.
- Section 62A-E Criminal Justice and Public Order Act 1994 – can be used by a Senior Police Officer to direct 1 or more trespassers to leave land and take any vehicles with them, but where it appears that the trespassers are in possession or control of caravans, there has to be a suitable pitch available on a relevant site before such a direction can be delivered; can be used on any land; is used for Identified Individuals and or their vehicles; does not require the courts; possession enforced by the police; return to the local authority area within three months – criminal sanctions.
- Injunction - Can be drafted to prohibit named individuals from engaging in certain activities or behaviours; can be expensive and difficult to obtain; a few local authorities have taken the approach and may be a viable longer term option.

4.2. In considering the legal approach decision makers need to be mindful of Article 8 of the Human Rights Act 1998 and being cognisant of the right to respect for private and family life. Decision makers will also need to be mindful of the fact that Gypsy and Travellers are a recognised ethnic group for the purposes of the Equality Act 2010 for which public bodies have a public sector equality duty.

4.3. For more detail on relevant legislation the document, *'Dealing with illegal and unauthorised encampments – a summary of available powers'* DCLG March 2015 is recommended reading.

5. Data Protection

5.1. All information sharing commitments as made under the Protocol will be compliant and within the parameters of the Data Protection Act 1998 and any future amendments to the Act. It is for the agency sharing information to satisfy itself of that accordingly.

6. Post-Incident Debriefing

6.1. Following the departure of the encampment, within 48 hours a debriefing meeting should be held by the lead agency. This meeting could be virtual, or by way of telephone/video conference. At the very least the lead agency, within 48 hours of the departure of the encampment, should ensure that the ECINS log created for the unauthorised encampment is updated. It is very important that information reflecting what went well, not so well and any lessons learnt is documented. Constant improvement in dealing with unauthorised encampments and information sharing will be golden threads of the debriefing process.

6.2. Whilst action around unauthorised encampments is not at all designed to criminalise any members of the Gypsy and Traveller communities – law breaking will not be tolerated. In that respect as part of the debriefing process it is important the police document and appropriately share information and intelligence in respect of any criminal aspects of the encampment. The police will also utilise the information and intelligence gathered to help build up a picture of the problem across the County. This will help ensure agencies are intelligence led going forward and best placed to make good decisions and use of resources to deal with the challenges posed.

7. Summary

7.1. In summary this protocol seeks to bring cohesion, consistency and sustainable effectiveness to the challenge of dealing with unauthorised encampments. It is absolutely recognised that such encampments can have a very significant and adverse impact on settled communities. Whilst consistent, positive and effective response is imperative it will be in a context of justification, proportionality, legality and absolute necessity. Negotiation should always prevail over any inclination for confrontation. However, criminal behaviour will not be tolerated whether within or outside of the encampment. It is an expectation of this protocol that the police will robustly gather information and intelligence and utilise it positively to neutralise any criminal behaviours.

7.2. The longer term sustainable solutions to unauthorised encampments go beyond the scope of this protocol and probably lie within the realm of national and local government planning and housing strategies. Warwickshire will contribute to the bigger conversation both on a regional and national basis as it is fully recognised and accepted that a wider collaborative approach is needed as part of the overall strategy.

8. Review

8.1. This protocol document will be reviewed every 12 months from the date of adoption.

Appendix 1a: Signatories to Protocol

Signed: Date:

On behalf of Warwickshire Police and Crime Commissioner

Signed: Date:

On behalf of Warwickshire County Council

Signed: Date:

On behalf of Warwickshire Police

Signed: Date:

On behalf of North Warwickshire Borough Council

Signed: Date:

On behalf of Nuneaton & Bedworth Borough Council

Signed: Date:

On behalf of Rugby Borough Council

Signed: Date:

On behalf of Warwick District Council

Signed: Date:

On behalf of Stratford-on-Avon District Council

Signed: Date:

On behalf of Warwickshire Fire and Rescue Service

Appendix 1b: Tactical and Operational leads for use of the Protocol

Organisation	Contact; Role; Address	Phone	E mail
Warwickshire Police and Crime Commissioner	Chris Lewis; Policy and Research Officer; 3, Northgate St., Warwick CV34 4SP	01926 418086 07971 602631	chrislewis@warwickshire.gov.uk
Warwickshire County Council			
Warwickshire Police			
North Warwickshire Borough Council			
Nuneaton & Bedworth Borough Council			
Rugby Borough Council			
Warwick District Council			
Stratford-on-Avon District Council			
Warwickshire Fire and Rescue Service			

Appendix 2: Notification to Authorities of an Unauthorised Encampment

Experience to do date shows that in the vast majority of instances when an unauthorised encampment is reported, the police are the first to be notified. Warwickshire Police commence an 'Initial Site Assessment Form'. Warwickshire Police will utilise the form to convey the following information to the relevant authorities:

- Date of arrival of travellers
- Address and location of encampment
- Land ownership
- Number of units and vehicles
- Profile of encampment e.g. numbers of families; business activities; associated equipment/effects; presence of animals
- Intended departure date
- Immediate problems/welfare issues
- Contact details

It is then expected that the ECINS log (see para. 2.5.) created for the unauthorised encampment will be utilised by the lead agency.

8

Appendix 3: Site Code of Conduct



Unauthorised Encampments

Code of Conduct

To ensure those members of the settled and gypsy and travelling communities can live together in a peaceful and unprejudiced way we expect you to comply with this Code of Conduct. We expect you to treat the land you have occupied with respect, and that you respect the rights and freedoms of other people who also wish to use the area.

Behaviour that may result in your eviction from a site includes the following:

- Camping upon any land designated as a public amenity, such as parks, recreation areas, school fields and similar locations - this is not an exhaustive list.
- Interfering with the rights and freedoms of other members of the public, including interrupting the operation of legitimate businesses.
- Forcing entry to land, by causing damage to any fixtures, fittings or landscaping (including planted areas). This includes digging away of earthwork defences, which have been placed at landowner's expense to prevent trespass.
- Causing any other damage to the land itself, or property on it. Particular care should be taken not to cause damage to those features provided as public amenities.
- Driving vehicles along any footpath, or other highway not specifically designed for road vehicles. This practice is not only unlawful but is also highly dangerous.
- Parking vehicles or caravans on any road, footpath or other highway that causes an obstruction to other people wanting to pass by. This includes parking immediately next to footpaths.
- Burning, dumping or tipping rubbish, waste materials or trade waste such as tree cuttings, rubble, etc. It is your responsibility to keep the site clean and tidy. Council Traveller Liaison Officers can direct you to Civic Amenity Sites (Council Tips) where you will be able to pay to dispose of trade waste.
- Using the area for open toileting. You must NOT deposit or leave human waste in or near this unauthorised encampment area.
- Abuse, intimidation or harassment of any person who is lawfully using the area.
- Excessive noise or other forms of anti-social behaviour especially after 10pm and before 7am.
- Animals that are not kept under control (including dogs fouling public places) or that attack persons lawfully on the land or nearby.
- Interference with electrical, water or gas supplies. Any person(s) found abstracting electricity, or wasting quantities of water may be subject of criminal proceedings.

These principles are the same standards of behaviour that are expected of the settled community. Warwickshire Police are committed to ensuring that all policing issues that affect you are balanced; however behaviour that is deemed unacceptable within society will not be tolerated.

Appendix 3: Guidance Notes

The above Code of Conduct has been successfully used by Warwickshire Police in recent times and it is proposed this document will be suitable for the foreseeable future. Even though the police are not the lead agency in the main, it seems practical for them to continue serving the Code of Conduct on initially attending the site having received the report of the encampment. The following notes are provided to help give guidance to the use of and interpretation of the Code:

The purpose of this code of conduct is to build relationships between all relevant parties and encourage good social behaviours by members of the encampment. Active compliance and cooperation with this code and respect for the site and its neighbours is essential. It should be noted, however, that the literary skills of members of unauthorised encampments can be varied. It cannot be assumed that by physically serving the Code, the process is complete. Verbal explanation should be provided.

Active compliance does not mean that the members of the encampment will be offered a tolerated trespass arrangement. The presumption is that the site will be vacated as soon as possible and ideally within 24 hours. It should be made clear that the failure to follow the Code of Conduct could result in enforcement action against any and all individuals.

Enforcement may include the use of Community Protection Notices. Such action is a relatively new consideration in dealing with unauthorised encampments. These notices were introduced under the Anti-Social Behaviour, Crime & Policing Act 2014 to stop businesses, organisations or individuals over the age of 16 from committing anti-social behaviour which spoils the communities' quality of life. They can be used to deal with most problems or nuisances which negatively impact on or affect the community, by targeting those responsible.

The lead agency may give consideration to the installation of temporary bins and toilets. Such measures could lead to cost savings in the longer term. However, it is fully recognised this is a decision for each local authority dependent on a range of local policy and cost recovery fact.

Damage to property or the environment will not be tolerated. However, Warwickshire Fire and Rescue Service may, dependant on location and circumstances, deem small camp fires as acceptable and safe. Costs for remedying any damage caused should be paid by the group or will lead to eviction from the affected site and all future sites.

Any allegations of criminal behaviour will be reported to the police.

Appendix 4: Information Sharing Meeting Checklist

In undertaking a full assessment of the unauthorised encampment it is recommended that the following topics, as a minimum, are considered in order to achieve a good and comprehensive decision making process. This list is not definitive and decision makers should consider all issues they believe to be relevant in the context of the particular unauthorised encampment that is being considered:

- In relation to the location of encampment – has ownership of the land been confirmed? Has the lead agency been established?
- Is there any particular sensitivity or risks in relation to the site? The level and type of complaints received; associated political issues and pressures may have to be taken into consideration.
- Any significant nuisance related to use of site? e.g. burning of fires/rubbish/incorrect or illegal disposal of waste materials.
- Any damage to any surrounding properties or places occurred due to the setting up of the encampment?
- Are there stray animals of any description related to the encampment causing public nuisance.
- Are there any safety implications related to site in particular public health issues?
- Are there any relevant planning permissions associated with site?
- What are the travel intentions of the encampment?
- Are any members of the encampment presenting with any welfare issues in relation to health, safeguarding or vulnerability?
- Are there any education requirements to be considered?
- What are the actual numbers of people and vehicles involved with the encampment? Have details been documented where appropriate?
- Has the encampment Code of Conduct been served? Is there any evidence of breach or non-compliance?
- If there are breaches should the police be considering utilising powers under sections 61 and 62 of the Criminal Justice and Public Order Act 1994?

Appendix 5: Template leaflet for residents and businesses

Other local authorities outside of Warwickshire have effectively utilised leaflets in neighbourhoods affected by unauthorised encampments. The following wording may be of use should any Warwickshire lead agency choose to take such an approach:

Unauthorised encampment in your area

Relevant local authority/public body/landowner, Warwickshire Police and your local councillors are aware of the unauthorised encampment in your area.

We want to reassure you that we are working together with the settled and traveller communities to resolve the situation as quickly as possible.

This can take time and may be subject to a legal process.

If you have any issues of anti-social behaviour or crime, please report these to the police on 101.

If you wish to report other issues to your local authority please email email.address@xcouncil.gov.uk or call *[insert number]*

Further updates about the steps the agencies are taking to resolve the situation will be published online at <http://www.warwickshire.gov.uk/travellerunauthorisedsites>

You can also report issues online through this site and provide contact details to be kept directly informed of key developments.

Local Authority

Warwickshire Police

Process for the Eviction of Illegal Encampments of Travellers

1. Information received from public that caravans have arrived.
2. Officers from our Housing department will visit the site to ascertain site ownership
3. If land belongs to Nuneaton and Bedworth Borough Council, attend the site with the Police, visit each caravan and speak to the occupiers. Take vehicle / caravan information - make / model and registration, info will be used in the eviction process.

Take to occupiers' information, officer must ask questions of the travellers to try establish if there are any vulnerable people with in the encampment e.g. someone receiving care from midwife as this forms part of the evidence presented in any future court hearing.

4. If there are no reasons to tolerate the encampment (rarely, a camp or an individual in that camp will be allowed to remain for a finite time if they have a good reason e.g. lady in hospital having a baby), then the officers will serve notices on each caravan under section 77 of the Criminal Justice and Public Order Act 1994. This is a legally binding document ordering that those vehicles leave the land within 24 hours. (It can be longer than 24 hours if the weekend falls at the end of that period).
5. If the camp remains on that place of land after the time limit has expired, our Legal Section will book a Court hearing.
6. Officers will visit the site, again, to serve the Court Summons on the occupiers.
7. The officers involved in the eviction will attend Court at the appointed time with the solicitor to present the evidence to the Magistrates and to answer any questions they may have.
8. If the Magistrate agrees to grant a Court Order, the officers will attend the camp to serve the Court Orders on the occupiers.
9. If the camp remains 24 hours after the order has been served, the Council may employ bailiffs to execute the Court Order and remove the caravans and associated vehicles.
10. Following vacation of a site, our Parks department will organise for the site to be cleaned.

WS on behalf of the Claimant
J.Bosworth
1st Statement
Dated:

Claim No: QB-2019-000616

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

In the matter of Section 222 Local Government Act 1972 and Section 187B Town and Country Planning Act 1990

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN

(2) –(53) OTHER NAMED DEFENDANTS

(54) PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF JOHN BOSWORTH

I, JOHN BOSWORTH, Club Chairman at Ambleside Community Sports Club, Ambleside Way, Nuneaton CV11 6AT,

WILL SAY as follows:

1. I make this witness statement in support of the Claimants application for an Injunction pursuant to s.222 of the Local Government Act 1972 and s.187B of the Town and Country Planning Act 1990.
2. As Club Chairman I am duly authorised to make this statement and I make it from my own information and belief save where otherwise stated.
3. Following the first national lockdown, on Thursday 20th August 2020 the Ambleside Thursday Side Cricket Team had finished their training session at the Ambleside Sports Ground and once everyone had left, around 8.30 - 8.45pm, the gates at the end of the drive on Ambleside Road were locked by the coach/manager Steven Randel. The lights on the car park were left on as usual, as they are controlled by a timer and switch off at 9.30pm each evening.

4. The Travellers were probably watching to see when everyone had vacated the club grounds and the gates were locked because between 8.45/9pm 8 traveller caravans strong, with cars and vans, and potentially 5 or 6 families, entered the grounds by bolt cutting the substantial lock on the entrance gates. This was witnessed by the Club Bookkeeper who lives directly opposite the gates to the grounds. She witnessed two men armed with equipment, that is presumed to be a bolt cutter, go to the gates. They used the equipment to gain access, opened the gates and the vehicles entered the site.
5. I was on holiday at the time of the incident, however, I was contacted by the Club Bookkeeper as the Travellers were entering the grounds and she left a message on my mobile phone as I was out.
6. I was also contacted by the Club Secretary Stewart Harbison and having spoken to Stewart I was informed of what had occurred, Stewart informed me that he had tried to speak to the travellers to agree a date for them to leave, but the travellers informed him that they had come from Ireland for a funeral and needed to catch their ferry back at the end of the weekend so would not be leaving until the Sunday. Although they gave this information to Stewart he informed me that they were not interested in engaging any further and refused to speak to him any further. They therefore were at the site from Thursday evening until Sunday evening.
7. Both the Police and the local Councillor were notified of the situation. Although the Police attended the site and took down the vehicle registration plates, they were unable to take any further action as the site was not included in the Injunction Order in force.
8. We then engaged private bailiffs and a writ was served at a cost of £600 to remove the encampment from the site.
9. Although the Club house was on limited opening due to Covid – 19, all activities at the site had to stop including – football, netball, bowls, cricket, Yoga, Taekwondo and Bowls. The Club house had also been open for happy hour at the weekends, with Covid and social distancing drinking protocols in place. Approximately £1000 income was predicted to have been lost due to the weekend closure of the Club House.
10. Once the travellers had vacated the site, we began clearing the site on the Monday. Having accessed the site, it was decided that due to the nature of the clear up it would be wise to employ a Biochemical Company to clear and disinfect the affected areas. The cost was £200 per hour and the site was cleared on Wednesday 26th August at a cost of £400.
11. Following the biochemical clear up it was discovered that the large green container on site, between the carparks, that was used to house equipment, had been broken into and had been used as a toilet! There was excrement and used toilet paper on the floor of the container, So not wanting to incur any further cost I proceeded to clear it myself.
12. The following photos show where the vehicles were positioned on the site and the inside of the container that had been broken into and used as a toilet. There was excrement and used toilet paper on the floor.



13. Given the damage, disruption to club activities and costs incurred by the club, I would request that this site be included in the Injunction, preventing unauthorised encampments.

Statement of Truth

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

John Bosworth – Club Chairman

Dated 16th August 22,
X424-409B / 00351759

2290

WS on behalf of the Claimant
P. Richardson
7th Statement
Dated: 17/08/2022
Exhibits; PR1/1-17

Claim No: QB-2019-000616

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

In the matter of Section 222 Local Government Act 1972 and Section 187B Town
and Country Planning Act 1990

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN

(2) –(53) OTHER NAMED DEFENDANTS

(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

SEVENTH WITNESS STATEMENT OF PHILIP RICHARDSON

I Philip Richardson, Director of Democracy, Planning and Public Protection at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton CV11 5AA, WILL SAY as follows:

1. I make this statement pursuant to paragraph 5(c) of the Order of the Honourable Mr Justice Linden dated 23 May 2022, which permitted the Claimants to file and serve any application to add further sites over which injunctive relief will be sought at the final hearing of this Claim (now listed for 12-15 December 2022).
2. I am duly authorised by the First Claimant to make this witness statement and I make it from my own information, knowledge and belief save where otherwise stated. This

witness statement has been prepared by way of email communication with both the First Claimant's legal department, as well as the Claimants' external legal advisors.

3. There is now shown to me a bundle marked 'PR1/1-17'. References to this bundle are in the format **PR 1/page number**.

The Additional Site

4. In addition to the sites referred to at exhibit PR1 of my statement dated 19th February 2019, the Claimants seek to add one further site to the Claim, over which final injunctive relief will be sought.
5. The site to be added is the Ambleside Sports Club off Ambleside Way, Nuneaton CV11 6AT (title nos. WK57909&WK392039) (which I shall refer to as the '**Site**' hereafter). The Site was encamped on by travellers, who were and remain Persons Unknown, between the 20th August 2020 and 23rd August 2020.
6. I attach at PR1/1-11 the Land Registry office copies and plans confirming the extent of the Site and its current ownership by the Higham Lane Leisure Association, who operate the Ambleside Sports Club at the Site.
7. This Application is also supported by a witness statement provided by the Club Chairman, John Bosworth. That statement sets out the details of the encampment, which consisted of 8 caravans and associated vehicles. The statement confirms that the travellers forced entry onto the Site sometime between 8.45pm and 9.00p.m on 20th August 2020, after the gates had been locked for the evening, by bolt cutting the lock on the entrance gate.
8. The statement provided by Mr Bosworth also highlights the difficulties that the Ambleside Sports Club experienced while the travellers remained at the Site, including having to cancel all sporting activities that were due to take place at the Club and closing the Club house, which resulted in a loss of income for the Club of approximately £1000. The Club also incurred the cost of employing a biochemical company in the sum of £400 to clean and disinfect the site after the encampment had left the Site.
9. The Police have confirmed to our officers that they did attend the Site, as referred to in Mr Bosworth's statement. Whilst the Police did record the incident, I understand from our files that the recorded registration numbers of the vehicles present at the Site were all Irish numbers, and unfortunately did not configure on the PNC system; as such, the Police were unable to retrieve any registered keeper details from the vehicle checks undertaken or identify the travellers. The Police were also unable to take action under the terms of the Interim Injunction, as the Site was not covered by the Injunction.
10. For clarity, I attach at PR1/12-17 an amended Schedule of Sites and Plan C, as referred to at Schedule 3 of the draft Orders filed with the Claim Form. The amendments reflect the addition of the Site.

The need to add the Site

11. The Claimants seek to add the Site to the Claim by reason of the August 2020 encampment, which demonstrated that the Site is clearly vulnerable to unauthorised encampments. The open character of the Site makes it especially vulnerable, as the

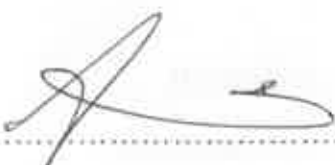
Site appears able to accommodate several caravans and associated vehicles, which would be attractive to travelling groups. Further, if other open spaces and/or similar sites in the Borough are protected by way of final injunctive relief, it is more likely that travelling groups will be attracted to the Site if it too is not protected.

12. Further still, encampments on the Site are especially inappropriate. The Ambleside Sports Club is used by members of the public, and it is unsafe and unsanitary for there to be the depositing of waste (including untreated human excrement) at the Site by those who form unauthorised encampments. As is clear from Mr Bosworth's statement, untreated human excrement was found after the encampment in August 2020 and, as the Court will be aware from the evidence in this Claim, it is sadly a feature of very many unauthorised encampments formed in the Borough that untreated human excrement is left behind when an encampment moves on.

13. Accordingly, the Claimants seek to add the Site to the Claim and secure final injunctive relief to protect the same.

Statement of Truth

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 

Philip Richardson – Director of Planning and Regulation

Dated: 17 / 8 / 22

WS on behalf of the Claimant
P. Richardson
7th Statement
Dated:17/08/2022

Claim No: QB-2019-000616

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

In the matter of Section 222 Local Government Act 1972 and Section 187B Town
and Country Planning Act 1990

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN

(2) –(53) OTHER NAMED DEFENDANTS

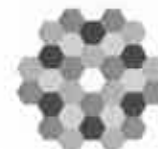
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS IN
THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

This is the Exhibit marked "PR 1/1-17referred to in the Seventh Witness
Statement of Philip Richardson

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number WK57909

Edition date 10.11.2016

- This official copy shows the entries on the register of title on 26 AUG 2021 at 12:08:52.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 26 Aug 2021.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Gloucester Office.

A: Property Register

This register describes the land and estate comprised in the title.

WARWICKSHIRE : NUNEATON AND BEDWORTH

- 1 The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land on the north side of Ambleside Way, Nuneaton.
- 2 The land tinted pink and tinted blue on the filed plan and other land has the benefit of the following rights granted by a Conveyance dated 23 March 1938 made between (1) Arthur John Simmonds Baxter (Vendor) and (2) Courtaulds Limited (Purchaser):-

"Together with a right of way for the Purchasers and their successors in title and all persons authorised by them at all times and for all purposes over the strip of land coloured Brown on the said plan and marked "Right of Way" the Purchasers paying a reasonable proportion of the cost of keeping such strip of land in repair such proportion to be agreed from time to time between the respective Surveyors of the Vendor and the Purchasers

And Together also with the right for the Purchasers and their successors in title the owner or owners for the time being of the premises hereby conveyed or any part thereof to connect with and use all sewers drains water pipes gas pipes and conductors of electricity now existing in or under the said strip of land coloured Brown on the said plan or hereafter constructed therein or thereunder."

NOTE 1: The land coloured Brown on the Conveyance plan has been tinted brown on the filed plan.

NOTE 2: Copy Plan Filed.

- 3 The land tinted yellow on the filed plan has the benefit of the rights granted by a Transfer dated 4 April 1967 made between (1) Fred Pallett Limited and (2) Courtaulds Limited.

NOTE: Original filed.

- 4 The land edged and numbered in green on the filed plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

Title number WK57909

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (02.05.1967) PROPRIETOR: AKZO NOBEL UK LIMITED (Co. Regn. No. 128124) of The Akzonobel Building, Wexham Road, Slough SL2 5DS and of jason.sayle@akzonobel.com.
- 2 RESTRICTION: Except under an order of the registrar no charge by the proprietor of the land is to be registered unless a certificate signed by the secretary, the solicitor or a director thereof has been furnished that such charge does not contravene any of the provisions of the memorandum and articles of association of the said proprietor.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 The land tinted pink and tinted blue on the filed plan is subject to the rights to lay and maintain a sewer and manholes and ancillary rights granted by a Deed of Grant dated 5 March 1931 and made between (1) Arthur John Simmonds Baxter and (2) The Mayor Aldermen and Burgesses of The Borough of Nuneaton.

NOTE: Original filed.

- 2 The land hatched blue on the filed plan is subject to rights of way.
- 3 Lease dated 4 April 1985 to Donald Thomas Jacques and others for 999 years from 1 April 1985 at the rent of a peppercorn.

NOTE: Lessee's Title registered under WK290382.

End of register

These are the notes referred to on the following official copy

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H.M. LAND REGISTRY

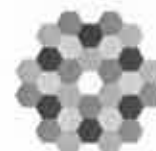
Scale 1/2500
County— WARWICKSHIRE NUNEATON DISTRICT
O.S. Sheet SP3792 & SP3793
1:2500

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5.

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Official copy of register of title

Title number WK392039

Edition date 17.04.2018

- This official copy shows the entries on the register of title on 25 AUG 2021 at 19:17:42.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 25 Aug 2021.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Gloucester Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

WARWICKSHIRE : NUNEATON AND BEDWORTH

- 1 (29.05.1985) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being Ambleside Leisure Association, Ambleside Way, Nuneaton (CV11 6AT).
- 2 The land tinted pink and tinted blue on the filed plan has the benefit of the following rights granted by a Conveyance of the freehold estate thereof and other land dated 23 March 1938 made between (1) Arthur John Simmonds Baxter (Vendor) and (2) Courtaulds Limited (Purchasers):-

"Together with a right of way for the Purchasers and their successors in title and all persons authorised by them at all times and for all purposes over the strip of land coloured Brown on the said plan and marked "Right of Way" the Purchasers paying a reasonable proportion of the cost of keeping such strip of land in repair such proportion to be agreed from time to time between the respective Surveyors of the Vendor and the Purchasers

And Together also with the right for the Purchasers and their successors in title the owner or owners for the time being of the premises hereby conveyed or any part thereof to lay gas water and other pipes and mains including electricity cables under such strip of land coloured Brown on the said Plan the Purchasers and their successors in title making good all damage occasioned thereto to the reasonable satisfaction of the Vendor

And Together also with the right for the Purchasers and their successors in title the owner or owners for the time being of the premises hereby conveyed or any part thereof to connect with and use all sewers drains water pipes gas pipes and conductors of electricity now existing in or under the said strip of land coloured Brown on the said plan or hereafter constructed therein or thereunder."

NOTE: The land coloured brown on the Conveyance plan is tinted brown on the filed plan.

Title number WK392039

A: Property Register continued

- 3 The land has the benefit of the following rights granted by a Transfer of the freehold estate in the land tinted yellow on the filed plan dated 4 April 1967 made between (1) Fred Pallett Limited and (2) Courtaulds Limited:-

"THE Transferor grants to the Transferee and its successors in title to the adjoining land being the Transferee's Sports field the right to connect to and to use any of the drains sewers service pipes or cable as shall within Eighty years of the date hereof be laid or run through over or under any part or parts of the land edged red on the accompanying plan or the adjoining land of the Transferor lying between the land edged red and Ambleside Way the Transferee making good all damage occasioned by making such connection and any such drains or other services jointly used to be maintained and repaired by and at the joint expense of the person for the time being enjoying the use thereof."
- NOTE: Original filed under WK57909.
- 4 (29.05.1985) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
Date : 4 April 1985
Term : 999 years from 1 April 1985
Rent : One peppercorn
Parties : (1) Courtaulds PLC
(2) Sambuke Limited
(3) Donald Thomas Jacques and others
- 5 There are excepted from the effect of registration all estates, rights, interests, powers and remedies arising upon, or by reason of, any dealing made in breach of the prohibition or restriction against dealings therewith inter vivos contained in the lease.
- 6 The landlord's title is registered.
- 7 Unless otherwise mentioned the title includes any legal easements granted by the registered lease(s) but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (17.05.2013) PROPRIETOR: HOWARD MALCOLM KERRY, WILLIAM JOHN CLARK and CLIVE ERNEST WOODFINE care of Higham Lane Leisure Association, The Pavilion, Ambleside Way, Nuneaton CV11 6AT.
- 2 (29.05.1985) Except under an order of the registrar no disposition by the proprietors of the land is to be registered unless authorised by constitution of the Higham Lane Leisure Association as evidenced by a certificate signed by the Chairman and Secretary of the said association.
- 3 (29.04.1988) RESTRICTION: No disposition by one proprietor of the land (being the survivor of joint proprietors and not being a trust corporation) under which capital money arises is to be registered except under an order of the registrar or of the Court.
- 4 (17.05.2013) The value as at 17 May 2013 was stated to be between £100,001 and £200,000.
- 5 (17.05.2013) The Transfer to the proprietor contains a covenant to observe and perform the covenants referred to in the Charges Register and of indemnity in respect thereof.

Title number WK392039

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 The land hatched blue on the filed plan is subject to rights of way.
- 2 The part of the land affected thereby is subject to the rights to lay and maintain a sewer and manholes and ancillary rights granted by a Deed of Grant dated 5 March 1931 and made between (1) Arthur John Simmonds Baxter and (2) The Mayor Aldermen and Burgesses of the Borough of Nuneaton.

NOTE: Original filed under WK57909.

- 3 (09.05.2001) REGISTERED CHARGE dated 3 May 2001 to secure the moneys including the further advances therein mentioned.
- 4 (17.04.2018) Proprietor: BARCLAYS SECURITY TRUSTEE LIMITED (Co. Regn. No. 10825314) of P.O. Box 16276, One Snowhill, Snowhill Queensway, Birmingham B2 2XE.
- 5 (17.05.2013) REGISTERED CHARGE dated 8 May 2013.
- 6 (17.05.2013) Proprietor: BARCLAYS BANK PLC (Co. Regn. No. 1026167) of Business Lending Services, P.O. Box 16276, One Snowhill, Snowhill Queensway, Birmingham B2 2XE.

End of register

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SITE NUMBER	MAP SITE APPEARS ON	SITE	>5 acres	POSTCODE	Land Owner	Title Number
1 B		Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS)	x		NBBC	WK447699
2 B		Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground/Pool Bank St)	✓	CV11 5PZ	NBBC	WK448289
3 B		Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton (aka Stanley Road/Vernons Lane Recreational Ground)	✓	CV11 5ET	NBBC	WK447951/ WK240764/ WK236363
4 B		Land being car park on the south west side of Corporation Street, Nuneaton (aka Upper Abbey Street Car Park)	x	CV11 5DG	NBBC	WK449598
5 B		Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street Car Park 1 and 2)	x	CV11 5QE	NBBC	WK449585/ WK178604
6 B		Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	x	CV11 4BW	Private	WK398438
7 B		Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park)	x	CV11 5DB	NBBC	WK450184
8 B		Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park)	x	CV11 4BS	Private	WK366584
9 B		Land and buildings on the east side of Broad Street, the north side of Queen's Road and the south west side of Abbey Street (aka Abbey Street Car Park)	x	CV11 5NE	NBBC	WK251517
10 B		Land at Church Street, Nuneaton (aka Church Street Car Park)	x	CV11 4AS	NBBC	WK449976
11 B		Land and buildings lying to the East of Coton Road (aka Town Hall Car Park)	x	CV11 5AA	NBBC	WK88582
12 B		Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)	x	CV11 4AL	NBBC	WK426642
13 B		Land at Coton Road, Nuneaton (aka Riverside Car Park)	x	CV11 5AA	NBBC	WK450298
14 B		Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park)	x	CV11 5JF	NBBC	WK448678
15 B		Land to the south side of Bermuda/land lying to the east and west of Coventry Road, Chilvers Coton/land on the west side of a road leading from Coventry to Nuneaton and a balancing lake and land to the south of Bermuda Road, Nuneaton (aka Bermuda Balancing Lake)	✓		NBBC	WK446511/ WK284250/ WK345881
16 C		Recreation Ground at Essayboro Way, Nuneaton (aka Attleborough Recreational Ground)	✓	CV11 4PY	NBBC	WK449338
17 C		Land on south side of Lutterworth Road, Nuneaton (aka Pauls Land)	✓	CV11 5QA	NBBC	WK449027
18 B		Land lying to the north east of Braemar Way, Nuneaton, Land on the south west and north east sides of Greenmoor Road & Land lying to the south east side of croft road (aka Jubilee Sports Centre)	✓	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
19 B		Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton (aka Marsdale Drive)	✓		NBBC	WK342561/ WK355952
20 B		Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC	WK447355
21 B		Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road (aka Whittleford Park)	✓	CV10 8PY	NBBC	WK130458/ WK447033
22 E		Land on the south side of Marston Lane, Nuneaton (aka Bailey Park)	✓	CV12 8DR	NBBC	WK448180
23 E		Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓		NBBC	WK448258
24 E		Spitalfields 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the north-west side of Rye Piece Ringway, Bedworth & Zion Chapel, High Street Bedworth	x	CV12 8NF	NBBC	WK448876/ WK246825/ WK448601
25 E		Park Road (Car Park) - land on the east side of Park Road, Bedworth	x	CV12 8LH	NBBC	WK448511
26 F		Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barnacle Lane, Bulkington, Bedworth	✓		NBBC	WK448611/ WK448624(part)
27 F		Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	x	CV12 9RF	NBBC	WK448510/ WK448500

28	F	Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	✓	CV12 8LT	NBBC	WK449849
29	B	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK439320
30	B	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramaden Avenue, Nuneaton (aka Stubbs Pool)	✓	CV10 9DJ	NBBC	WK448197/ WK448093
31	B	Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton (aka The Dingle)	✓	CV10 9DE	NBBC	WK373879/ WK448013
32	B	Land on the south side of Willow Road, Nuneaton	✓		NBBC	WK447731
33	D	Land on the West side of Blackberry Lane, Bedworth	✓		NBBC	WK137139
34	E	Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	✓	CV7 9EX	NBBC	WK450050
35	D	Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedworth	✓	CV7 8NG	NBBC	WK124031
36	E	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry (aka Silverstone Drive)	✓		NBBC	WK338223
37	E	St. Giles Recreational Ground - Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	x	CV7 9GZ	NBBC	WK143991/ WK154857
38	B	Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Mar.)	✓	CV10 9TD	NBBC	WK358453
39	A	Land south-east of Hickman Road, Galley Common, Nuneaton (aka Chaucer Drive)	✓	CV10 9SD	NBBC	WK339730
40	A	Nuneaton & North Warks Group Riding for Disabled, Valley Road, Galley Common (CV10 9NJ) / land at Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NJ) aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre	x	CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
41	B/A	Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the north east side of Marlin Avenue, south east side of Freeland Rise, Whittleford and land lying to the West of Bucks Hill (aka Freeland Rise)	✓	CV10 9QF	NBBC	WK319146/ WK326554
42	B/A	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Frensham Drive/Poplar Tree Farm EA)	✓	-	NBBC	WK319145
43	A	Land on Galley Common, Nuneaton; land at Galley Common Nuneaton and Land on the south side of Plough Hill Road, Stockingford (aka North Field)	✓	CV10 9PZ	NBBC	WK238447/ WK238145/ WK324522
44	B	Land on the south side of Sherbourne Avenue, Nuneaton	x	CV10 9JH	NBBC	WK234444
45	D	Land on the south side of Cardigan Road, Bedworth (aka Anderton Road POS)	✓	CV12 0HD	NBBC	WK281821
46	E	Land and Buildings at Market End Farm and Orchard Farm, Smorall Lane	✓	CV12 0GE	Private	WK380708
47	E	Newdigate Recreational Ground - Land at Smorall Lane, Bedworth	✓	CV12 0JP	NBBC	WK449987
48	A	Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thomtons Way)	✓	CV10 8NN	NBBC	WK32497
49	A	Kingswood Road Recreational Ground - Land on the North side of Ansley Road, Stockingford	x	CV10 9QG	NBBC	WK32497
50	B	Stockingford Recreational Ground - Land on the west side of Westbury Road, Nuneaton and land on the north-east side of Grove Road, Nuneaton and land lying to the west of Nuneaton Road	✓	CV10 8JX	NBBC	WK448137/ WK448304/ WK317827
51	E	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8NW	NBBC	WK449032
52	E	Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way)	x	CV6 6TE	Private	WK394575
53	E	Land on the North side of Bulkington Road and land on the South side of Johnson Road/Alex Wilson Centre, 34 Nuneaton Road, Bedworth (CV12 8AL) and land lying to the west of Woolton Street and land at Elizabeth Centre, Johnson Road	✓	CV12 9BH	NBBC	WK189700/ WK448189/ WK250992/ WK448429
54	E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBC	WK449032
55	E	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8NN	NBBC	WK449032
56	E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8JT	NBBC	WK449032
57	E	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	x	CV12 8JG	NBBC	WK365034
58	E	Land at Arbury Avenue, Bedworth (aka Arbury Road POS)	x		NBBC	WK448598
59	E	Collycroft Recreational Ground - Land lying to the east of Amos Jacques Road, Collycroft, Bedworth and land to the west of Nuneaton Road/Alex Wilson Centre 34 Nuneaton Road Bedworth and land to the west of Nuneaton Road	✓		NBBC	WK295858/ WK480024/ WK448189/ WK317827
60	E	Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road)	x	CV12 0AL	NBBC	WK449846
61	C	Land lying to the north of Bultermere Avenue, Nuneaton	✓	CV11 8EP	NBBC	WK210986
62	C	Land at Horseton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	x		NBBC	WK336798/ WK344607

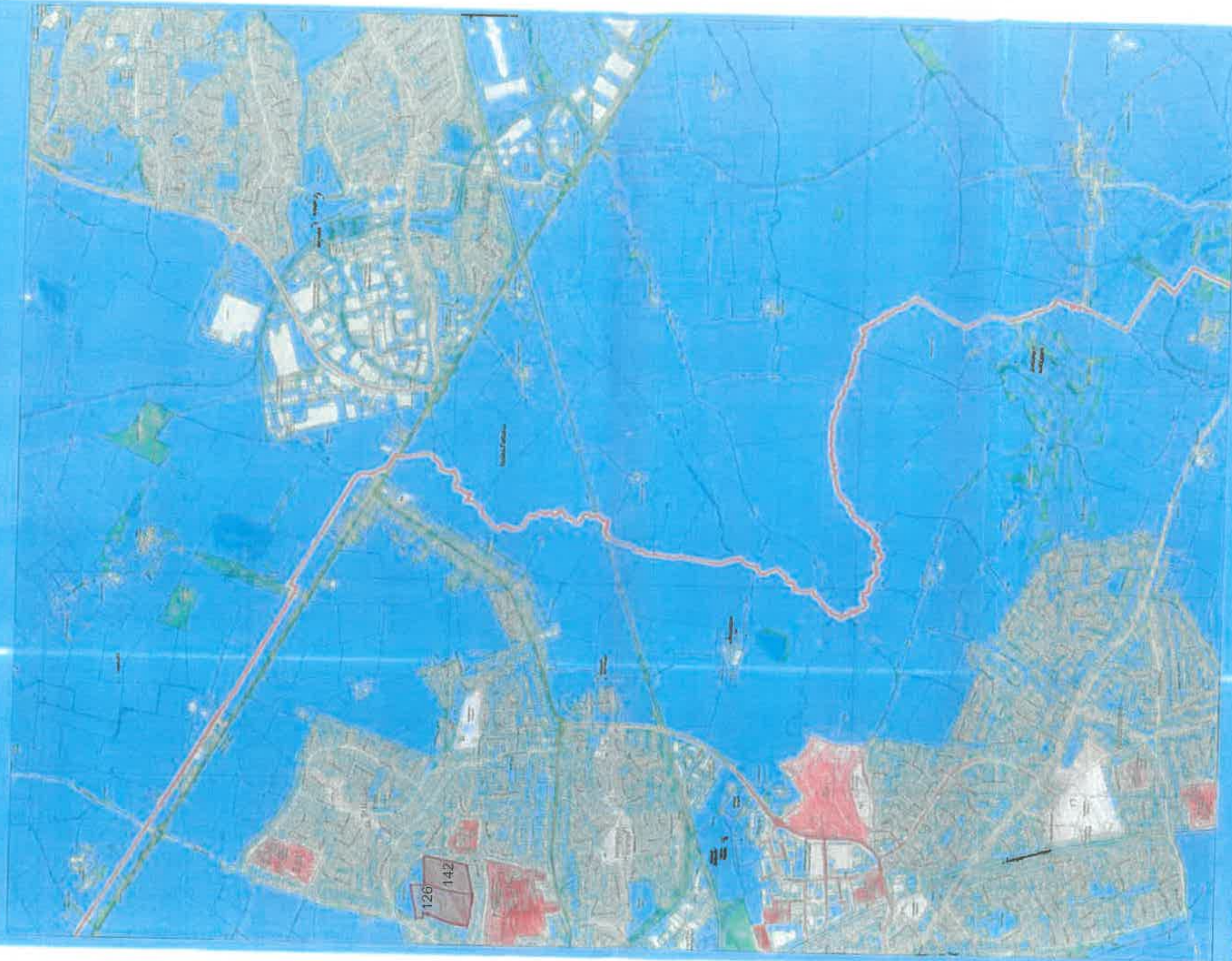
63	C	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	x	CV11 6YB	NBBC	WK447654/ WK319282
64	C	Recreation Ground, The Long Shool, Nuneaton, (CV11 6JH)	x	CV11 6JH	NBBC	WK448886
65	C	Land at Horseion Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Drive/Tavistock Way)	✓	CV11 6YL	NBBC	WK336798/ WK447654
66	C	Land on the east side of Changebrook Close and land on the west and east side of Pallet Drive, Nuneaton	✓	-	NBBC	WK345480/ WK309853
67	B	Land on the south side of Church Lane, Nuneaton (Cleaver Gardens/Sandon Fields)	✓	CV10 0HG	NBBC	WK448958
68	B	Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue, Nuneaton (aka Coronation Walk)	✓	CV10 0BN	NBBC	WK448098/ WK448091
69	B	Land at Bradestone Road, Nuneaton	x		NBBC	WK450499
70	B	Land on the north side of Donnihome Avenue, Nuneaton (aka Caldwell Grange)	x		NBBC	WK452385
71	B	Land on the south side of Avenue Road, Nuneaton (aka Gala Fields)	✓		NBBC	WK452276
72	B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingies Showground)	✓		NBBC	WK448965
73	B	Land on the north side of Donnihome Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	x		NBBC	WK449842/ WK449810
74	B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton	x	CV11 5PO	NBBC	WK447475
75	B	Land at Donnihome Avenue, Nuneaton; land lying to the east of Rave-o-e Drive, Nuneaton; land on the east side of Marston Lane, Nuneaton and Land on the east and west sides of Marston Lane, Nuneaton (aka Marston Lane Fields)	✓	CV11 4RE	NBBC	WK452370/ WK452349/ WK449466/ WK449734
76	B	Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chilvers Coton	✓	CV10 7BX	NBBC	WK448537/ WK344972
77	B	Riversley Park, Coton Road, Nuneaton	✓	CV11 6TY	NBBC	WK450206/ WK450173
78	B	Land at Somell Road, Nuneaton	✓	CV10 7AW	NBBC	WK450035
79	B	Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton	x	CV11 5TX	NBBC	WK450206/ WK450173
80	B	Land on the north side of Avenue Road, Nuneaton (aka Pingies Leisure Centre Car Park)	✓	CV11 4LX	NBBC	WK448965
81	C	Crowhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 6XA	NBBC	WK370915
82	B	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	x	CV11 4PW	NBBC	WK310067
83	E	Land at Acacia Crescent, Bedworth	x		NBBC	WK448428
84	B	Land at Dunns Close, Nuneaton	x		NBBC	WK452330
85	E	Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry)	x		Private	WK394575
86	C	Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton	x		WCC	WK271645/ WK455358
87	E	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC	WK470015/ WK424958
88	D/E	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV7 9AH)	✓	CV7 9AH	Private	WK463626
89	E	Race Lays Infant School, Bedworth	x	CV12 8AD	WCC	Unregistered
90	E	Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)	✓	CV12 0HP	WCC	WK424335
91	E	All Saints Bedworth C of E Primary School and Nursery, Bedworth	x	CV12 9HP	WCC	Unregistered
92	F	Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth	x	CV12 9RT	WCC	WK79471
93	E	The Cannons C of E Primary School - aka Land and buildings on the South side of Denwent Road, Bedworth	✓	CV12 8RT	Private	WK225063
94	E	Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth	x	CV7 9FJ	WCC	WK33092
95	D	Keresley Newland Primary Academy and Keresley Newland School, , Grove Lane, Keresley, Coventry, (CV7 8JZ)	✓	CV7 8JZ	WCC	WK427632/ WK477207
96	D	Newdigate Primary School and Nursery - aka Land lying to the South of Smorrel Lane, Goodyears End, Bedworth and Land lying to the South of smorrel Lane Bedworth	✓	CV12 0HA	WCC	WK27604/ WK134659
97	D/E	Wheelwright Lane Primary School, Ash Green, Coventry	✓	CV7 9HN	WCC	WK425267
98	E	St Francis Roman Catholic School, Nicholas Street, Bedworth	x	CV12 8JN	Private	WK262596
-		Land lying to the North of Rye Piece Ringway, Bedworth			Private	WK476476
-		Land on the East Side of Nicholas Street, Bedworth			WCC	WK171388

99	E	St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV7 9NS	WCC	WK171647
100	F	St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF)	✓	CV12 9PF	Private	WK461720
		Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth, CV12 9PF			Private	WK472707
101	E	St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9DA)	✓	CV12 9DA	Private	WK479304
102	B	Land adjoining St Thomas More Catholic School and Sixth Form College, Greenmoor Road, Nuneaton, CV10 7EX	✓	CV10 7EX	Private	WK478035
		St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX			Private	WK477530
		Arbury High School, Greenmoor Road, Nuneaton			Private	WK233418
103	B	Abbey C of E Infant School, Nuneaton	x	CV11 5EL	WCC	Unregistered
104	B	All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)	x	CV10 7AT	Private	WK461748
105	B	Camp Hill Primary School, aka Land to the South of Tuttle Hill, Camp Hill, Nuneaton	✓	CV10 9QA	WCC	WK409218
106	C	Chetwynd Junior School, aka Land lying to the South of Gipsy Lane, Nuneaton	✓	CV11 4SE	WCC	WK170501
107	B	Land at Judkins Quarry, Tuttle Hill, Nuneaton (aka Recycling Centre)	✓	CV10 0HU	WCC	WK393091
108	B	Chilvers Coton Community Infant School, Frank Street, Nuneaton (CV11 5RB)	x	CV11 5RB	WCC	WK424955
109	B	Croft Junior School, aka Land lying to the west of Northumberland Avenue, Nuneaton	✓	CV10 8ER	WCC	WK239413
110	B	Galley Common Infant School, Nuneaton	x	CV10 9NZ	WCC	Unregistered
111	C	Milby Primary School, aka Land lying to the East of Higham Lane, Nuneaton	✓	CV11 6JS	WCC	WK205172
112	B	Glendale Infant School, aka Land on the south side of Skye Close, Nuneaton	x	CV10 7LW	WCC	WK178493
113	B	Middlemarch School, Nuneaton	✓	CV10 7BQ	WCC	Unregistered
114	B	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	x	CV10 8HW	WCC	WK426573
		Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
115	B	Our Lady of the Angels Infant School and St Josephs RC First School at Coton Road, Nuneaton	x	CV11 5TY	Private	WK226511
		Our Lady of the Angels Infant School and St Josephs RC First School, Coton Road, Nuneaton, CV11 5TY			Private	WK477543
116	A	Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton	✓	CV10 8NL	Private	WK470637
		Land on the North Side of Ansley Road, Nuneaton			Private	WK189736
117	B	Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR			Private	WK471379
118	B	St Pauls C of E Primary School, Nuneaton	x	CV10 8NH		Unregistered
119	B	Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	x	CV10 0JX	Private	WK480568
		St Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX			Private	WK449953
120	B	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	x	CV11 4QH	Private	WK468047
		Oakwood Secondary School, Morris Drive, Nuneaton			Private	WK468048
		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH			WCC	WK233776
121	C	Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 6HJ	x	CV11 6HJ	WCC	WK473130
		Land on the East Side of Windemere Avenue, Nuneaton			Private	WK131856
		St Nicolas C of E First School, Windemere Avenue, Nuneaton, CV11 6HJ			Private	WK473119
122	B	Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton	✓	CV10 0DR	WCC	WK149023/WK216447
123	B	Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP	✓	CV11 4QP	Private	WK458966
124	B	Wembrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton	✓	CV11 4LU	NBBC	WK448965
125	B	Etone College, Leicester Road, Nuneaton, CV11 6AA	✓	CV11 6AA	WCC	WK425515
126	B	Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	✓	CV10 0BJ	Private	WK465311
127	B	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓	CV11 4QH	WCC	WK468047/WK468048/WK233776
128	B	The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Red	✓	CV10 7PD	WCC	WK175243/WK425489
129	C	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓	CV11 6BH	Private	WK428695
130	B	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓	CV11 4BE	Private	WK497842/WK497832

131	E	Bedworth Heath Nursery School, Globe Avenue, Bedworth, CV12 0DP	x	CV12 0DP	WCC	WK426282
132	D	Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
"		Exhall Grange Special School, Wheelwright Lane, Coventry			Private	WK440475
"		Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP	✓	CV7 9HP	Private	WK450903
133	E	Quest Academy, North Side of Griff Lane, Nuneaton	✓	CV10 7SD	WCC	WK365844
134	E	Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton	x	CV12 8AG	WCC	WK240628
"		Race Leys Middle School, Barton Road, Bedworth, CV12 8HG		CV12 8HG	Private	WK465841
135	B	Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
"		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 8JH	WCC	WK42667
136	C	Whitestone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton	x	CV11 4SQ	WCC	WK23140
137	B	Attleborough Mills, Attleborough Road, Nuneaton (aka Holman Way)	x		Private	WK256088
138	B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton	x	CV11 5SS	Private	WK430022
139	B	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓	CV10 7SD	Private	WK447390
140	B	Halfords - land and buildings on the south side of Newtown Road, Nuneaton	x	CV11 5UT	Private	WK390614
141	B	Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre)	✓	CV10 7HU	Private	WK474729
142	C	Land on the North Side of Ambleside Way, Nuneaton CV11 6AT (aka Ambleside Community Sports Club)	✓	CV11 6AT	Private	WK392039/WK57909



Northeast Nuneaton



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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

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Statement on behalf of the Claimants
 Witness: W.M.H. Rose
 1st Statement
 Dated: 21.11.2022
 Exhibits: "WMHR1"

IN THE HIGH COURT OF JUSTICE

Claim No. QB-2019-000616

KING'S BENCH DIVISION

B E T W E E N : -

**(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
 (2) WARWICKSHIRE COUNTY COUNCIL**

Claimants

and

**(1) THOMAS CORCORAN
 (2)-(53) OTHER NAMED DEFENDANTS
 (54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
 THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

WITNESS STATEMENT OF WILLIAM MAXWELL HUNT ROSE

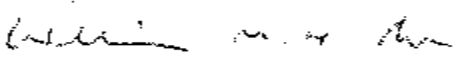
I, WILLIAM MAXWELL HUNT ROSE, of Sharpe Pritchard LLP, Elm Yard, 10-16 Elm Street, London, WC1X 0BJ

WILL SAY as follows:-

1. I am a Solicitor and Partner in the firm of Sharpe Pritchard LLP. I make this statement from my own information, knowledge and belief save where otherwise stated.
2. I make this statement in support of an application for a stay of these proceedings pending an appeal which has been brought to the Supreme Court in the case of *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* (UKSC 2022/0046). Nuneaton & Bedworth Borough Council and Warwickshire County Council were two of many Claimants in proceedings which resulted in a Court of Appeal decision which is the subject of the appeal to the Supreme Court. Nuneaton & Bedworth Borough Council and Warwickshire County Council are now two of many Respondents in the Supreme Court. The appeal has been expedited with a provisional listing date of 8 and 9 February 2023.

3. There is now produced and shown to me marked "WMHR1" a letter dated 28 October 2022 from the Community Law Partnership. Also, within "WMHR1" is the Order of the Court of Appeal and the Decision of the Supreme Court of 25 October 2022 granting permission to appeal to the Appellants, namely the London Gypsies and Travellers and others.
4. Nuneaton & Bedworth Borough Council and Warwickshire County Council agree with the suggestion from the Community Law Partnership that the hearing of this matter be stayed pending the judgment in the Supreme Court case.

***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.......... Dated: 21 November 2022
William Maxwell Hunt Rose

Statement on behalf of the Claimants
Witness: W.M.H. Rose
1st Statement
Dated: 21.11.2022
Exhibits: "WMHR1"

IN THE HIGH COURT OF JUSTICE

Claim No. QB-2019-000616

KING'S BENCH DIVISION

B E T W E E N : -

**(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL**

Claimants

and

**(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

"WMHR1"

This is the exhibit marked "WMHR1" referred to in the witness statement of William Maxwell Hunt Rose
dated 21 November 2022

T: 0121 685 8595

Email: office@communitylawpartnership.co.uk
www.communitylawpartnership.co.uk

BY E-MAIL ONLY

Nuneaton and Bedworth Borough Council

Our Ref: 13295/5/CJ/VO

Your Ref: Chris Johnson

28 October 2022

Dear Sir/Madam

Re: Nuneaton and Bedworth Borough Council and Warwickshire County Council -v- Thomas Corcoran and Others
KB – 2019 – 000616
Hearing on 12 and 13 December 2022

We attach here the decision of the Supreme Court of 25 October 2022 giving the Appellants in *London Gypsies and Travellers and Others -v- Wolverhampton City Council* permission to appeal. In light of this decision, we write on behalf of Derbyshire Gypsy Liaison Group who have, amongst other things, remit with regard to Gypsy and Traveller issues in the Midlands area, to ask for your confirmation that the Hearing of this matter will be adjourned pending Judgment in the Supreme Court case.

We look forward to hearing from you further on this.

Yours faithfully



The Community Law Partnership Limited

Enc



TUESDAY 1ST FEBRUARY 2022

IN THE COURT OF APPEAL

ON APPEAL FROM QUEEN'S BENCH CLAIMS
QB-2019-000616

BEFORE SIR GEOFFREY VOS, MASTER OF THE ROLLS
AND LORD JUSTICE LEWISON
AND LADY JUSTICE ELISABTH LAING



CA-2021-000631

B E T W E E N

1. NUNEATON AND BEDWORTH BOROUGH COUNCIL
2. WARWICKSHIRE COUNTY COUNCIL

CLAIMANTS /
APPELLANTS

- and -

1. THOMAS CORCORAN
2. (53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH

DEFENDANTS /
RESPONDENTS

- and -

1. LONDON GYPSIES AND TRAVELLERS
2. FRIENDS, FAMILIES AND TRAVELLERS
3. DERBYSHIRE GYPSY LIAISON GROUP
4. HIGH SPEED TWO (HS2) LIMITED
5. BASILDON BOROUGH COUNCIL

INTERVENERS

UPON the Appellant's appeal brought by way of an appellant's notice dated 7 June 2021 against the Order of Mr Justice Nicklin (dated 24 May 2021), and with permission to appeal being granted by Lord Justice Underhill on 13 July 2021

AND UPON hearing Caroline Bolton and Natalie Pratt of counsel for the Appellants, Marc Willers QC, Tessa Buchanan and Owen Greenhall of counsel for the First to Third Interveners, Richard Kimblin QC of counsel for the Fourth Intervener, Tristan Jones of counsel as Advocate to the Court, and receiving written submissions from Wayne Beglan of counsel for the Fifth Intervener and the Defendants neither appearing nor being represented

IT IS ORDERED THAT:

1. The appeal is allowed.
2. The proceedings shall be restored to the general Queen's Bench list and listed for a directions hearing before a judge on the first available date after 11 March 2022, with a time estimate of 2 hours.
3. There be no order as to costs.

ON PAPER

Application No.

CA-2021-000631
(A2/2021/1017)

4. Permission to appeal is refused.

BY THE COURT



IN THE SUPREME COURT OF THE UNITED KINGDOM

25 OCTOBER 2022

UKSC 2022/0046

Before:

Lord Hodge
Lord Hamblen
Lord Stephens

**Wolverhampton City Council and others (Respondents) v
London Gypsies and Travellers and others (Appellants)**

AFTER CONSIDERATION of the Appellants' application for permission to appeal the order made by the Court of Appeal on 1 February 2022, and application for a protective costs order and alternative service, and of the notices of objection filed by the Respondents and the submissions filed by the Interveners

THE COURT ORDERED that

- 1) Permission to appeal be GRANTED
- 2) No costs be awarded against or in favour of the Appellants in any event
- 3) The application for alternative service be GRANTED.

A handwritten signature in blue ink, appearing to read 'Cour Angus'.

Registrar
25 October 2022

Statement on behalf of the Claimant
 Waheeda Sheikh – First Statement
 Exhibit 'WS1 -WS2'
 Dated: 30 September 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2019-000616

B E T W E E N :

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE BOROUGH
OF NUNEATON AND BEDWORTH

Defendants

WITNESS STATEMENT OF WAHEEDA SHEIKH

I, WAHEEDA SHEIKH, Solicitor to the Council at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA will say as follows:-

1. I make this witness statement pursuant to paragraph 2 of the Order of the Honourable Mrs Justice Heather Williams dated 27th March 2024. I make this witness statement in support of Nuneaton and Bedworth Borough Council's (the '**Council**') application for injunctive relief pursuant to the Town and Country Planning Act 1990, s187B against both named individuals and Persons Unknown who form unlawful encampments within the Council's administrative area. I am authorised by the Council to make this witness statement on its behalf.

2. This statement is made from my own personal knowledge and/or from information ascertained from files and records kept by the Council. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been made through the use of email and telephone communication with the Council's internal legal department and external legal representatives.
3. I shall refer to the interim injunction order dated 22nd March 2019 as the '**Injunction Order**'.
4. I exhibit to this witness statement a bundle of documents marked **WS1 and WS2**. References to that exhibit are in the format **WS1/page number or WS2/page number**.

Encampments since June 2022

5. On the 27 July 2022, the former Director of Planning and Regulation (Philip Richardson) made his sixth witness statement in these proceedings, setting out details of the unauthorised encampments in the Borough since the making of the Injunction Order.
6. I am making this statement to update the Court with the information relating to the unauthorised encampments that have happened in the Borough since June 2022.
7. There have been 17 unauthorised encampments in the Borough since then, of which 6 have been on land owned and managed by the Council, 3 on land owned and managed by Warwickshire County Council (the '**County**') and 8 on private land. The encampments have comprised between 2 to 15 caravans plus associated vans and cars. The Council and County owned sites concerned are in the main covered by the Injunction, and have included public open space, recreation grounds and car parks.
8. The table below provides details of the encampments, including the date, duration, number of vehicles and details of nuisance, antisocial behaviour and associated clean-up costs, and how they have been effectively managed within the terms of the Injunction Order. I have

compiled this table after reviewing the Council's records of unauthorised encampments in the Borough. In the table, 'NBBC' refers to the Council, and 'WCC' refers to the County.

Dates	Site	Land Owner	Details of Unauthorised Encampment
26- 27.7.22	Vernons Lane, Nuneaton. Attempted access to fields at rear of former Manor Park School (now known as the Discovery Academy)	WCC	<p>On the 26th July 2022, the Council received information from members of the public to suggest that members of the Travelling community were attempting to gain access to the Vernons Lane site at the rear of the Discovery Academy. The informant indicated that there was damage being caused to the gates and railings to gain access. The matter was immediately reported to the Police, who confirmed they were already aware of the situation and were investigating.</p> <p>The Warwickshire Police Gypsy and Traveller Liaison Officer was able to confirm that 2 caravans and associated vehicles were on the highway causing a minor obstruction. He had spoken to the families who had indicated that they would only be there for a short stay, and they vacated as agreed prior to any action being taken.</p>
28- 29.09.22	Vernons Lane	WCC	On the 28 th September 2022, reports were received from Martin Rone-Clarke, the Gypsy and Traveller Liaison Officer with Warwickshire Police of 8 Caravans and associated vehicles on the highway at

			Vernons Lane. The Police and the County confirmed that they were aware of the encampment and the occupants had vacated prior to any action being taken by them and relocated to land belonging to the Council at The Dingle, Camp Hill, Nuneaton.
28.09-01.10.22	The Dingle, Camp Hill	NBBC	<p>The Council were notified that the unauthorised encampment of 8 caravans and associated vehicles previously on the highway at Vernon's Lane as referred to above had moved onto The Dingle, which is open space land at Camp Hill, Nuneaton. This land falls into the ownership of the Council and procedures were instigated to undertake welfare checks and assess the situation, before deciding on the most proportionate and appropriate response to the encampment.</p> <p>No welfare issues were noted following the visit by Council Officers, and the occupants vacated on 1st October 2022, prior to the enforcement of the Injunction Order.</p>
14-17.10.22	Iron Bridge Way, Exhall Incident number:267/141022 & 106/151022	NBBC	The Council received reports from elected Members of an unauthorised encampment at Iron Bridge Way, Exhall on 15 th October 2022. It was reported that there were approximately 12-15 Caravans and associated cars and vans on the site

			<p>behind the trees.</p> <p>Council Officers attended the site with Martin Rone-Clarke, the Gypsy Liaison Officer with Warwickshire Police, and spoke to the group. Following a negotiated stay of two days, the group vacated prior to enforcement of the Injunction Order.</p>
28-30.01.23	KFC Bermuda Park	Private	<p>The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed that there had been an encampment consisting of 8 Caravans, which had previously been in Rugby, and which had set up camp on a private business car park at KFC Bermuda Park. The site owners utilised common law powers, and the trespassers vacated prior to any enforced legal action by the land owner.</p>
27.03.23	Avenue Road, Nuneaton	Private	<p>The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed that 4 caravans and associated vehicles set up camp on a disused private car park, and vacated and relocated to a nearby business car park prior to any enforcement action being taken.</p>
27-28.03.23	Evri Depot, St David's Way	Private	<p>The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed that the 4 Caravans and associated vehicles from Avenue Rd (above), set up camp on disused car park, but vacated within a</p>

			short period prior to enforcement action, and with no issues identified. The encampment then left the county of Warwickshire.
29.05.23	KFC Bermuda Park, St David's Way, Nuneaton.	Private	The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed that 8 Caravans and associated vehicles established camp on a private car park. The group have previously visited this area earlier in the year with no issues of concern.
12-14.06.23	Pingles Leisure Centre Car Park	NBBC	<p>The Council were notified by its Leisure Services Operator of an encampment consisting of 7 caravans and associated vehicles on land leased from the local Authority by the Leisure Services Contractor.</p> <p>As there were several planned events taking place at the Leisure Centre, including a triathlon and a swimming gala, which were likely to attract large numbers of members of the public to the Leisure Centre, the police considered it proportionate to exercise their powers under Section 60C of the Criminal Justice Public Order Act 1994 and served notice on the occupants to vacate by midday on 14th June. Having reviewed the Council's records, this encampment appears to be the first and only time that the Police have</p>

			<p>used the 'new' powers inserted into the 1994 Act by the Police, Crime, Sentencing and Courts Act 2002.</p> <p>The site was vacated the following day.</p>
13.06.23	Tiverton Drive Site 62, Plan C Title number WK336798.	NBBC	<p>The 7 Caravans and associated vehicles previously at the Pingles car park moved onto land at Horeston Grange. The land they moved onto was covered by the Injunction Order as it was part of site 62 on Plan C, and as result the Council visited the encampment with the assistance of the Police and explained this to the occupants.</p> <p>Once informed of the Injunction Order, 6 vans left immediately and the Police confirmed that they would return later to the site to make sure the remaining 2 vehicles had also left.</p> <p>As the encampment was on the site for only a very short time there was a lesser impact on the local area and the condition of the site upon it being vacated.</p>
28-30.06.23	Evri Depot, St David's Way	Private	<p>The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed that an encampment of 7 caravans and associated vehicles forced open a padlock on the gate to gain entry to the disused depot. The group had previously occupied this site in March and April of the same year, moving</p>

			on after a short period on both occasions.
30.06.23	SRB Group, Townsend Drive	Private	The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed there had been an encampment of 7 caravans, plus one additional caravan previously located at the encampment at St David's Way, and that they had forced open a lock to gain entry to the business car park. No significant impacts were reported, and the encampment was dealt with by the land owner under.
07- 10.07.23	Tiverton Drive	NBBC	<p>On the 7th July 2023, the Council received reports from its elected members of an unauthorised encampment of 3 caravans on Council open space land at Tiverton Drive, Nuneaton.</p> <p>The Council's Private Sector Housing Manager, in liaison with the Police, attended to assess the encampment. They ascertained that there was a 6 month old child who was receiving medical treatment at Coventry hospital and that Martin Rone-Clarke, the Gypsy Liaison Officer from Warwickshire Police, was working with the family and the GT Officer in Dudley to seek accommodation in the West Midlands and enable the child to be transferred to Birmingham Childrens' Hospital.</p>

			<p>Reports indicated that bollards had been removed to gain access to the site, but no damage could be identified and the Police confirmed that, given the welfare needs of the child, they would not be using their powers to move the family, until the alternative accommodation had been secured.</p> <p>In light of the welfare requirements of the small child, it was deemed appropriate that the encampment be tolerated over the weekend until the Monday, when the site in Dudley was going to be available.</p> <p>On 10th July 2023, Martin Rone-Clarke confirmed that arrangements had been made for the family to move to Dudley, and that they would be leaving that same day. No further action was taken in relation to this encampment.</p>
13-17.07.23	Vernons Lane, Nuneaton – Sites 3, 138 and 20 are protected by the Interim Injunction and appear on Plan B.	WCC	<p>The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed that on the 13th July reports were received of an unauthorised encampment on the highway at Vernons Lane, Nuneaton. The Police attended the site to assess the situation with representatives from the County, and confirmed there were 9 Caravans and associated vehicles on the highway which is adjacent to the sites referred to. On speaking to the</p>

			<p>occupants, the Police had been informed that they would be leaving the site later the same day or the following day as they were on their way to the Christian Light and Life Festival in Rutland. The County Gypsy and Traveller Team and the Police confirmed they would monitor the situation, with the County leading and taking appropriate action if the group were still in situ the following Monday.</p> <p>Reports were received by the Council from its elected members to say that they had been contacted by their constituents and informed that the occupants were using the tunnel under the railway line from Vernons Lane Fields to the Dumbles as a toilet, and the request was for this to be cleaned up as part of the process once the encampment had left.</p> <p>On Monday 17th July 2023, the County were notified of the above reports to the Council, and they confirmed that the Travellers were still in situ on the site and it had had commenced the s.77 CJPOA 1994 process to seek removal of the encampment.</p> <p>Initial notice to vacate had been served on the group, and the Council were informed by WCC that they had then left on 18th July 2023 prior to any further action being taken.</p>
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25- 27.08.23	KFC Bermuda Park	Private	The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed that an encampment of 15 Caravans and associated vehicles had entered an unsecure private car park (the height restriction barriers were open). Martin Rone-Clarke advised the Council that there were numerous incidents of anti-social behaviour in the immediate locality reported to the Police, and also further into the town, mainly involving young people from the Encampment. A dispersal order was used, and after an agreement the group vacated the site and left the area.
06- 07.09.23	KFC Bermuda Park	Private	The Warwickshire Police Gypsy and Traveller Liaison Officer confirmed an unauthorised encampment of 7 Caravans and associated vehicles had arrived from Rugby and set up an encampment. They were on a private car park, and vacated prior to action from the land owner. The encampment also vacated the area and did not re-appear elsewhere.
11- 20.09.23	Middlemarch Recreation Ground – referred to on the list of sites protected by the injunction as Site 76 – Plan B -Land lying on	NBBC	On the 12 th September 2023, the Council's operative working in the area reported that approximately 25 caravans and associated vehicles entered the park area and set up camp on the recreation ground. Attached is the email informing the

	<p>the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chilvers Coton CV107BX – title nos:WK448537/WK344972</p>		<p>Council of the encampment, and the photos taken of the encampment marked 'WS1/1-2'.</p> <p>Following the report, the site was visited by Martin Rone-Clarke, the Gypsy and Traveller Liaison/Advisor at Warwickshire Police, and he was able to confirm that they had visited the site and completed an initial assessment. He also confirmed that there were 10 caravans and associated vehicles on site, 6 children per caravan, 2 females per caravan and one male per caravan. 7 dogs on site: 5 dogs chained up and 2 not chained up. They had been informed that the occupants intended to stay until Saturday, and at the time of the visit the site was clean and no issues had been reported. However, he had noted that they did have off road bikes on site which may cause issues, which they would continue to track. It was believed that they had accessed the site from the Bermuda side past the train station.</p> <p>He confirmed the vrms of the vehicles on the site as follows:</p> <p>YD63 2PW, YS65 OKU, MV23 BKJ, MF 22 XCO, LX07 EWF, YH58 DVF, EF65 YPN, R410 LGC, BY61 PVE, BW70 EWC, SB65 VGR, CV12 XWC, BF14 YKC, YH65 AHU, CK13 VGH, BK21 SZO CARAVAN, BK21 SZO FORD TRUCK, RAZO NEY.</p>
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			<p>However, no registered keeper details were provided, such that none of the occupants of the encampment were identified.</p> <p>Martin Rone-Clarke confirmed that they had not seen any further incidents of concern attributed to this encampment, and the Police were not proposing any enforcement action as the impact is minimal, but they would continue to monitor the situation.</p> <p>He also confirmed that from a Police perspective, with minimal impact recorded at the early stage of the encampment and with persons unknown being involved, they did not believe it would be proportionate to exercise the power of arrest in the Injunction Order, and suggested that instead the section 77 CJPOA process would be the most proportionate, given the information available.</p> <p>Officers from the Private Sector housing team attended the site in the afternoon of the 12th September 2023 with Police officers and served Section 77 directions under the Criminal Justice and Public Order Act 1994 on all the vehicles referred to above, except registrations YS65 OKU and MF 22 XCO as they were not on site at</p>
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			<p>the time of the visit. The Directions required the occupants to vacate the site by 9.00a.m. the following morning.</p> <p>Officers visited the site at approximately 9.35a.m. on 13th September 2023, and confirmed that the encampment was still on site and showed no signs of moving.</p> <p>On 18th September 2023 an order was secured at Coventry Magistrates Court under s.78 of the Criminal Justice and Public Order Act 1994 for the removal of the unauthorised encampment and arrangements were made for the orders to be served on the vehicles and for bailiffs to attend the site on 20th September 2023. The witness statements in support of the application together with the Order made by the Magistrates Court are attached marked 'WS1/3-72'.</p> <p>The group vacated the site just prior to eviction, and the significant impact of their presence on the site and antisocial behaviour came to light once the group had vacated, this included:-</p> <ul style="list-style-type: none"> - fly-tipping of mostly green waste and chippings from trees that have been cut down and left on site from possible local jobs undertaken for residents, tyres, sofas and bagged waste as well as
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			<p>scattered debris. Around 10 tipper loads as an estimate, provided by officers.</p> <ul style="list-style-type: none"> - other refuse and also damage to the site surface given the number of vehicles etc - untreated human waste deposited on the site - reports of nuisance caused by dogs being left to roam without a lead, and children not being able to use park equipment during encampment. <p>Reports by members of the public to the Council of nuisance and antisocial behaviour, as well as photographs taken of the site by officers following the departure of the encampment, are attached marked 'WS1/73-103'</p> <p>The Council's contractor (Glendale) was instructed to clear the area and had to use a tractor, low loader and grab to clear the items. The total cost of clearing the site was £6,055.61.</p>
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9. The Council has worked with the County and Warwickshire Police to manage the encampments in the Borough since the making of the Injunction Order. In particular, the above information demonstrates the Council's approach to taking a proactive and proportionate response to unauthorised encampments. The Council is alive to the needs of members of the Travelling community, and has shown a willingness to tolerate encampments

on a short terms basis where there is a compelling need to do so (primarily a welfare need), and not enforce the Injunction Order or take other enforcement action. Examples of such toleration can be found with the encampments at Tiverton Drive in July 2023 and Iron Bridge Way in October 2022. As demonstrated by the encampment at Vernons Way in July 2023, unfortunately sometimes encampments overstay the toleration period and enforcement action is still required.

10. I note that there have been 4 encampments on the KFC Bermuda Park site since June 2022.

That site is privately owned and is not owned by either the Council or the County. The site is not included within the scope of the Injunction Order. The Claimants have not made an application to add this site to the Injunction Order, as there has been no approach from the landowner requesting for it to be added. The Claimants are amenable to seeking the addition of privately owned sites (such as the Ambleside Sports site, which the Claimants have applied to add), but are mindful of the proportionality of adding lots of sites to the scope of the Injunction. Therefore, the Claimants consider that private sites should only be sought as an addition to the scope of the Injunction Order where a landowner has requested the addition, and demonstrated that they are unable to effectively and proportionately manage encampments and harms that are suffered by the encampments.

11. Warwickshire Police have assisted in managing and moving on encampments, and their Gypsy and Traveller Liaison Officer (Martin Rone-Clarke) is invaluable in that he works alongside all agencies and the Gypsy Romany Traveller Community to ensure that there are positive working relations to protect both the settled and Travelling communities. Ordinarily, it is Council Officers who serve the Injunction Order upon encampments, but they are often (although not always) accompanied by Police Officers when doing so.

12. Work is currently underway to refresh the County-wide protocol in relation to the management of unauthorised encampments, to ensure a consistent approach across the County to unauthorised encampments. The Council is actively engaged in that process. At present the Injunction Order provides a balance to the Protocol and the powers available to the Council and the Police, and is an invaluable tool in the management of unauthorised encampments in the Borough. It is hoped that once the County-wide protocol is established, and Council Officers have been trained in that protocol and when enforcement of the

Injunction Order is the appropriate response to an unauthorised encampment, the Injunction Order will prove an even more effective tool for the management of any unauthorised encampment that occurs; experience shows that service of the Injunction Order on an encampment is an effective way to limit the harms suffered by reason of an encampment, as the encampment is more likely to promptly vacate the land.

Effect of the Injunction Order

13. There has been a significant decrease in the volume of unauthorised encampments in the Borough since the grant of the Injunction Order: only 17 encampments have occurred since June 2022, with no encampments having occurred at all in 2024.

14. Further, when alerted to the Injunction Order, encampments tend to vacate the land, which reduces the duration of encampments that do form in the Borough (see, for example, the encampment at Tiverton Drive in June 2023). Reducing the duration of encampments reduces the harm that is suffered by reason of an encampment. For example, it is less likely that significant fly-tipping or instances of anti-social behaviour will occur if an encampment is in situ for only a short period of time. Therefore, the Injunction Order can be very effective in reducing the harms that are typically suffered by reason of an unauthorised encampment.

Provision for Gypsy & Traveller Sites in the Borough

15. Following a review of the Gypsy and Traveller requirements in 2021, the Council produced the Council's draft Gypsy and Traveller Site Allocations Development Plan Document (the 'DPD'), which was attached to Mr Richardson's sixth witness statement as PR1/14-37. The DPD was based on evidence that with the current occupied and vacant pitches within the Borough, there was a need for 16 additional residential and no transit pitches to meet the needs of those who meet the definition of Travellers, as set out in the Planning Policy for Traveller Sites, August 2015.

16. The publication version of the DPD was consulted on between the 28th January 2022 and the 25th March 2022, and the responses received were considered before the DPD and supporting documents were submitted for Examination to the Secretary of State (Planning Inspectorate) on the 29th June 2022.

17. The Planning Inspector held a public examination hearing on the DPD on the 27th October 2022 and, as part of the Examination process, amendments to the DPD were agreed with the Inspector.

18. Following receipt of the Report on the Examination from the Planning inspector on the DPD on the 18th December 2023 (and the suggested modifications), the DPD was considered to be sound and recommended for approval. The Council resolved to adopt the DPD at its Extraordinary Council Meeting on the 17th January 2024. I attach to my statement the Report of the Assistant Director for Planning, including the appendices and the minutes confirming the resolution marked 'WS2/1-81'

19. The adopted DPD superseded Policy H3 on Site Allocations for Gypsy's and Travellers in the First Claimant's Adopted Borough Plan 2011-2031, and ensured that the Council had in place a Policy to allocate sites to meet the Borough's identified need for a 5 year supply of Gypsy, Traveller and Travelling Show Persons pitches and plots.

20. The DPD, which is attached to the Report referred to above, allocates the following sites/pitches in the Borough:-

- i. GTSA1 – Sunrise Cottage for 3 additional pitches;
- ii. GTSA2 – The Old Nursery for 5 to 6 new pitches; and
- iii. GTSA3 – Winter Oak for 6 additional pitches.

21. During the examination, the Planning Inspector also considered the transit provisions for sites and plots in the Borough, and concluded that the Council's existing approach to using its negotiated stopping arrangements was a satisfactory response in the absence of allocated specific sites in the DPD for this purpose, and stated:

"In terms of transit provision, the GTTSA recommended that the Council make use of negotiated stopping arrangements. In this regard, the Council has already made use of negotiated stopping in the Borough and has developed a standard agreement that both it

and the Gypsies and Travellers in question sign in such circumstances. This includes the condition the site will be left in, the services that will be provided to it (refuse collection, portable toilets, etc), and includes a financial bond. The Council intends to roll out this approach going forward. In light of the evidence before me, including that given at the hearing session, I am satisfied that this is a sensible approach to transit provision and that the DPD is therefore sound in the absence of allocating sites for this purpose.”

22. As referred to above the Council is also currently attending meetings with the County, neighbouring local authorities and Warwickshire Police to agree a standard Warwickshire County-wide Protocol on Negotiated Stopping, and agree a standard protocol setting out arrangements for negotiating, managing and monitoring the sites used for this purpose.

23. I am therefore able to confirm that the Council has in place a suitable plan for the supply of sites and plots for the Gypsy and Traveller community for the next five years, as well as a good working relationship with the other local authorities and Warwickshire Police to agree a Negotiated Stopping Policy and standards agreements that will benefit both the settled and Travelling communities when in the Borough. If made final, Injunction Order will assist the Council in taking a proportionate approach to the effective management of unauthorised encampments, and will be used only as necessary, as demonstrated above.

Full and frank disclosure

24. I understand that the Council is under a duty of full and frank disclosure in relation to Persons Unknown. To that end, and as may be apparent from the descriptions of the encampments above, I should clarify that I have been unable to confirm that the Injunction Order was served on each of the above-described encampments. As I have explained, the Injunction Order would typically be served by a Council Officer, and not a Police Officer, as the Police take the view that this is a matter for the Council and is not a Police matter; however, the Council records do not confirm whether the Injunction Order was served on each occasion. It is possible, and probably likely, that the Injunction Order has not always been served, especially as there has been a turnover of staff since the grant of the Injunction Order. With that in mind, the Council will be working with its Officers to ensure that a consistent approach is adopted going forward, especially considering the abovementioned protocol that is currently being worked on.

Conclusion

25. The Injunction Order has dealt with unauthorised encampments to very good effect. The significantly reduced frequency of the encampments, and the reduced duration of encampments that do occur, has reduced the environmental and public health impact of those encampments, and the costs incurred by the Council in managing unauthorised encampments.

Statement of Truth

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

A handwritten signature in black ink, consisting of a stylized 'W' and 'S' followed by a horizontal line.

Waheeda Sheikh
Solicitor to the Council

Dated 30 September 2024

Statement on behalf of the Claimant
First Statement of Waheeda Sheikh
Exhibit 'WS1 -WS2'
Dated: 30 September 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2019-000616

B E T W E E N :

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE BOROUGH
OF NUNEATON AND BEDWORTH

Defendants

Exhibit 'WS1'

Amy Pittam

From: Nuneaton Quality <nuneaton.quality@glendale-services.co.uk>
Sent: 12 September 2023 11:38
To: [REDACTED]
Cc: [REDACTED]
Subject: Middlemarch Rec: Caravan's
Attachments: small_1694513582JPEG_20230912_111251_5731934152752089083.jpg; IMG_20230912_111637410.jpg

Good afternoon,

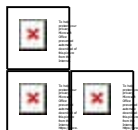
Apologies if you are already aware, but our operative has just reported travellers on Middlemarch Rec - see photos. About 25 vans.

Regards

[REDACTED]

Compliance Administrator
Glendale Grounds Management Nuneaton,
Unit 2, Eastboro Way, Attleborough,
Nuneaton, CV11 6SQ.

Tel: [REDACTED]



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WITNESS STATEMENTS
(Criminal Procedure Rules, Part 27)

Statement of Witness

(Criminal Procedure Rules, r 27, 1(1);
 Criminal Justice Act 1967, s. 9, , Magistrates' Courts Act 1980, s. 5B)

STATEMENT OF David Dale

Age of witness : over 18

I am an Environmental Health Officer employed by Nuneaton and Bedworth Borough Council (NBBC) Private Sector Housing Team.

At approximately 4pm on the 11th September 2023 Doreen Katusiime, Senior Environmental Health Officer, asked me to accompany her to a reported traveller site in the area Middlemarch. We were unable to locate the site at that time. On 12th September myself and Andrew Hibbs, Technical Officer, Private Sector Housing again looked for the site. At approximately 10:30, we located the site located on Middlemarch Recreation Ground. It became apparent that there were between 10-15 vehicles and vans that had appeared to have entered the Recreation Ground via a footpath adjoining St Georges Way.

I consulted the list of sites owned by NBBC to check if the site is an authorised camp site or whether it is covered by an injunction obtained by NBBC dated 22nd March 2023. I confirmed that the land in question is indeed covered by this injunction and is identified as site number 76: "Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chilvers Coton". I attach a copy of the Injunction Order at exhibit DD1 and a plan of the site outlined in red at exhibit DD2.

At 11:52 I became aware that the police had visited the site and identified 18 vehicles on the site and I was advised of the Vehicle Registration Markings of the vehicles. I prepared directions under Section 77 of the Criminal Justice and Public Order Act 1994 for each of the vehicles. The directions required the vehicles to vacate the site by 09:00 on 13th September 2023.

At 14:00, I met PC Amelia Loveridge and PCSO Lewis Ridley on the small carpark at the top of Middlemarch Road. We then proceeded over the footbridge to the recreation ground,

I also met with a gentleman who identified himself as Luke, who owned the Vehicle CV12 XWC. He said that bags had been provided by the Council, so he believed that he had permission to use the land. I informed him that this is not an authorised site and that he could not remain.

Notices for vehicles YD63 2PW, LX07 EWF, YH58 DVF, EF65 YPN, BW70 EWC, SB65

VGR, YH65 AHU, BK21 SZO were handed to the occupants of the vehicles after a welfare questionnaire was completed. In each case when asked whether there was anybody receiving medical attention or pregnant, the answer was negative.

Directions to leave the site forthwith under Section 77 of the Criminal Justice and Public Order Act for vehicles R410 LGC, BV 61 PUE, CK13 UGH, BF14 YKC, CV12 XWC, CV10 7BX, and MV 23 BKJ were served on the vehicles by placing the notice in a polythene pocket and affixing it under the windscreen wipers. Copies and photographs are exhibited at exhibit DD3. Copies of all welfare questionnaires completed on site are exhibited at exhibit DD4. The Directions are presented as Exhibit DD5.

Vehicles YS65 OKU and MF 22 XCO were not on site at the time.

On 13th September 2023, I was made aware that the vehicles were still on site at 9:35am.

On 14th September I returned to the site with Mr Hibbs, PC Loveridge and PSCO Ridley and served the Summons. I explained to each person who answered, the location and time of the hearing. I taped a copy of the summons to two lamp posts, along with new directions addressed to "all vehicles" at the site. Copies of the summons were also attached to all vehicles. I attach a copy of the summons as exhibit DD6

During my visit, there were 3 vehicles which were not there previously. These were not occupied, so I served directions to them too, these were SE17 SKV, SK21 EYV and YD63 ZPW. I attach copies of the new directions and served on each vehicle along with copies of the summons. Photos taken of the new directions and the summons attached to vehicles and the lamp posts are attached to exhibit DD7.

My concerns are that we are having complaints from the public for example:

- Noise
- Loss of amenity eg dog walking, space for children to play, damage to trees
- I have also received complaints that there are now horses, sheep and dogs roaming free on the site.
- Damage to the local trees and recreation ground.

This statement, (consisting of two pages each signed by me), is true to the best of my knowledge and belief and I make it knowing that if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

15th September 2023

[formerly form 13, Magistrates' Courts' (Forms) Rules 19810 (SI 1981/553), relating to rule 70 of the Magistrates' Courts Rules 1981, section 9 of the Criminal Justice Act 1967 and section 5B of the Magistrates' Courts Acts 1980].

IN THE HIGH COURT OF JUSTICE

Claim Number: QB 2019 001616

QUEEN'S BENCH DIVISION

IN THE MATTER OF S22 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990

Before Timothy Straker QC (sitting as a Deputy Judge of the High Court)

On the 19th day of March 2019

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants



-and-

(1) THOMAS CORCORAN & 53 OTHER NAMED DEFENDANTS IN SCHEDULE 1
OF THE CLAIM FORM(2) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTHDefendants

ORDER

IF YOU, ANY OF THE ABOVE NAMED FIRST TO FIFTY-THIRD DEFENDANTS OR PERSONS UNKNOWN DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

UPON HEARING COUNSEL MISS CAROLINE BOLTON FOR THE CLAIMANTS AND THE DEFENDANTS NOT ATTENDING

AND UPON READING THE PAPERS AND HEARING THE APPLICATION FOR AN INTERIM INJUNCTION PENDING THE FINAL INJUNCTION HEARING PURSUANT TO SECTION 222 LOCAL GOVERNMENT ACT 1972 AND 187B TOWN AND COUNTRY PLANNING ACT 1990

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST FOR BREACH OF PARAGRAPHS 1-9 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006 AND SECTION 1 OF THE ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014. ANY PERSON CAUGHT BREACHING PARAGRAPHS 1-10 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

Note to Arresting Officer: Where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or the Anti-social Behaviour Crime and Policing Act 2014 :-

- The defendant shall be brought before the judge within a period of 24 hours beginning at the time of their arrest
- A constable shall inform the person on whose application the injunction was granted forthwith where the defendant is arrested under these powers

Nothing in sections 27 of the Police and Justice Act 2006 or the Anti-social Behaviour Crime and Policing Act 2014 shall authorise the detention of the defendant after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculation any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

IT IS ORDERED THAT:

1. The proceedings shall be stayed against the 1st Defendant Terry Maughan, 28th Defendant Simon McDonough, 36th Defendant Martin Ward and 37th Defendant Pat Ward with liberty to restore.

Until further order, The First to Fifty-Third Defendants (save for the 1st, 28th, 36th and 37th Defendants) are forbidden from

2. Setting up or encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land
3. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or planning permission granted by the Secretary of State.
4. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Carcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter [REDACTED]
5. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of the parking with the relevant permission from the Council.

7. From causing or allowing to be erected, constructed, situated on or on the Land, unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.
8. From depositing on the Fifty-Fourth Defendant (see Schedule 2)
 - a. Setting up an encampment on any land identified on the attached map and list of sites without written permission from the local planning authority, or planning permission granted by the Secretary of State;
8. From entering and/or occupying any part of the land identified on the attached map and list of sites for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia;
9. From bringing onto the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with express permission from the owners of the land;
10. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit;
11. There be a power of arrest attached to prohibitions 7-10 of this order.

The Land in this order means:

12. For the First to Fifty-Third Defendants, all land within the administrative boundaries of Nuneaton and Bedworth Borough Council as appears within the marked red outline on the attached map at Schedule 2 of this Order. The said map clearly identifies the boundaries of the Borough of Nuneaton and Bedworth correctly and the principal towns and settlements within the Borough;
13. For Persons Unknown (the Fifty-Fourth Defendant) all the land marked on the map at Schedule 3 of this Order and identified by the key to the map and numbered 1 to 141, further details of which are on the list at Schedule 3 of this Order;
14. Service of this Order shall be by affixing a copy of this Order in a transparent envelope, or laminated copy, in a prominent position on the land;
15. The Defendants may, each of them, or anyone notified of this Order, apply to the Court on 72 hours written notice to the Court and the Chairman to vary or discharge this order (or so much of it as affects that person);
16. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

- 16. A Defendant who is an individual who is ordered not to do something must not do it or allow any others to do it, must not let it happen, must not encourage others to do it or be involved in any way in its occurrence;
- 17. A Defendant who is a corporation and which is ordered not to do something must not do it, its directors, officers, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

- 19. It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

INTERPRETATION OF THIS ORDER

- 20. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
- 21. A requirement to serve on "the Defendants" means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.
- 22. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
- 23. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990.

COMMUNICATIONS WITH THE COURT

- 24. All communication to the Court about this order should be sent to Room WC08 Royal Courts of Justice, Strand, London, WC2A 9LL (020 7947 6010).

SCHEDULE 1 – LIST OF DEFENDANTS

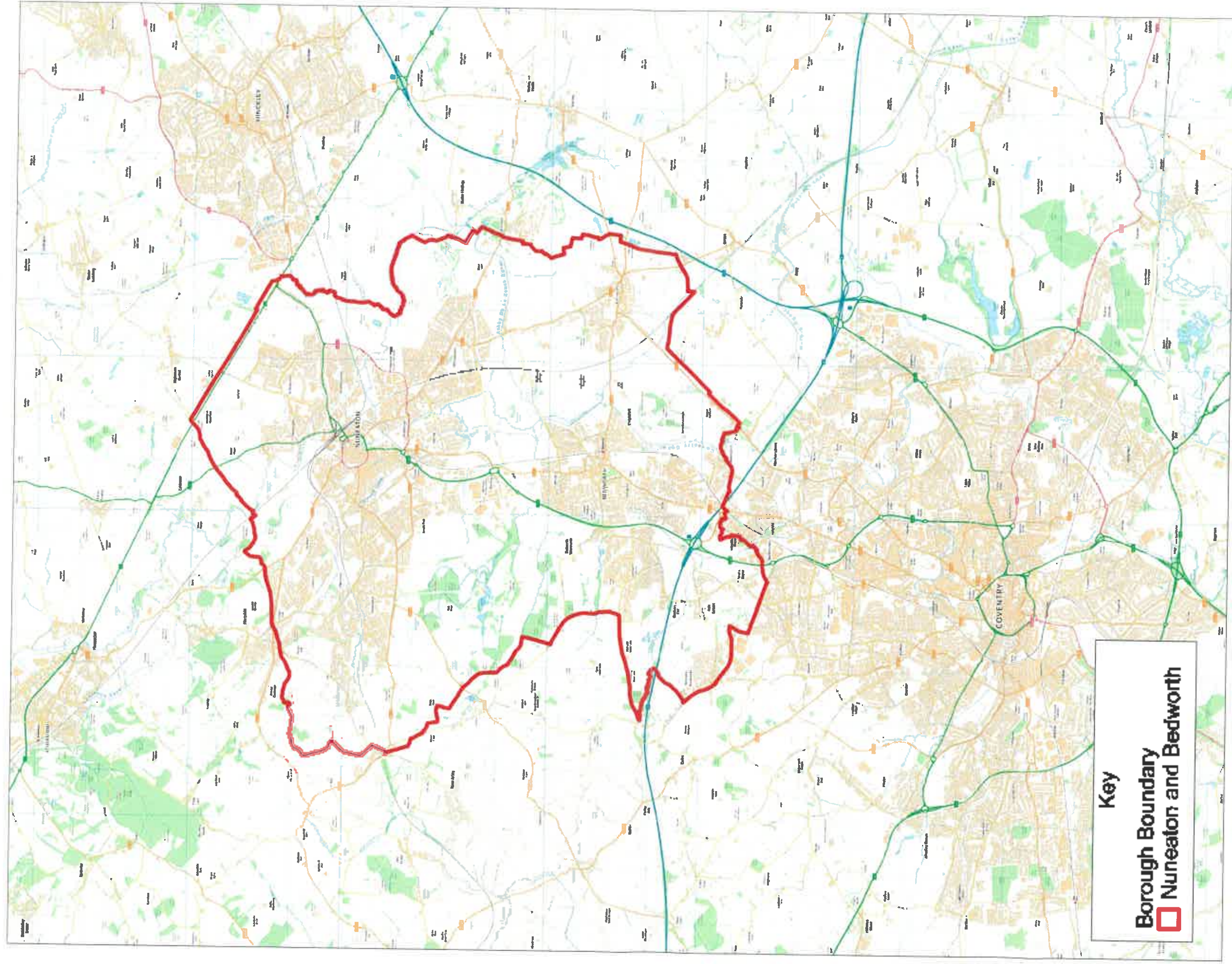
List of Defendants and their addresses

- (2) JESSICA DODD,
- (3) MICHAEL DOYLE
- (4) LUKE DELANEY
- (5) PATRICK MCGINLEY,
- (6) ALPHONSUS MCGINLEY
- (7) MICHAEL STOKES
- (8) MICHAEL STOKES
- (9) DENNIS STOKES
- (10) DENNIS STOKES (JNR)
- (11) BRIAN STOKES, 12a
- (12) JOHN MAUGHAN
- (13) TERRY MAUGHAN
- (14) ~~TERRY MAUGHAN~~
- (15) PATRICK MAUGHAN
- (16) OWEN MAUGHAN
- (17) OWEN MAUGHAN
- (18) ~~BERNARD CORCORAN~~
- (19) ~~FRANCIS CORCORAN~~
- (20) FRANCIS MAUGHAN
- (21) MARTIN MAUGHAN
- (22) THOMAS MAUGHAN
- (23) JOHN MONGAN
- (24) ~~MARTIN MONGAN~~
- (25) MARTIN MONGAN
- (26) LEONARD MONGAN
- (27) PAUL McDONAUGH
- (28) ~~SIMON McDONAUGH~~
- (29) BERNARD McDONAUGH
- (30) JOHN McDONAUGH
- (31) MIKE McDONAUGH
- (32) MARTIN McDONAUGH
- (33) AARON McDONAUGH
- (34) ~~KATHLEEN McDONAUGH~~
- (35) WINNIE McDONAUGH
- (36) ~~MARTIN WARD~~
- (37) ~~PAT WARD~~
- (38) MICHAEL WARD
- (39) KATHLEEN WARD
- (40) ~~ROSELEEN WARD~~
- (41) BERNIE SWEENEY
- (42) JOHN CONNORS
- (43) ~~TRACEY BROWN~~
- (44) ~~WILLIAM BRIDGES~~

- (45) ~~TOM WARD~~
- (46) ~~EDDIE McDONOUGH~~
- (47) ~~EDDIE (AKA EDWARD) WARD~~
- (48) ~~CHRISTOPHER McDONOUGH~~
- (49) ~~WILLIAM DOHERTY~~
- (50) ~~GERRY O'BRIEN~~
- (51) ~~ELIZABETH O'BRIEN~~
- (52) ~~PEARL BLAINLEY~~
- (53) ~~FIONA WARD~~
- (54) PERSONS UNKNOWN

SCHEDULE 2 – MAP OF THE BOROUGH

Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Not to scale



SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

SITE NUMBER	MAP SITE APPEARS ON	SITE	>5 acres	POSTCODE	Land Owner	Title Number
1 B		Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS)	x		NBBC	WK447699
2 B		Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground/Pool Bank St)	✓	CV11 5PZ	NBBC	WK448269
3 B		Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton (aka Stanley Road/Vernons Lane Recreational Ground)	✓	CV11 5ET	NBBC	WK447951/ WK240764/ WK238363
4 B		Land being car park on the south west side of Corporation Street, Nuneaton (aka Upper Abbey Street Car Park)	x	CV11 5DG	NBBC	WK448599
5 B		Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street Car Park 1 and 2)	x	CV11 5QE	NBBC	WK448585/ WK178804
6 B		Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	x	CV11 4BW	Private	WK388438
7 B		Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park)	x	CV11 5DB	NBBC	WK450184
8 B		Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park)	x	CV11 4BS	Private	WK388584
9 B		Land and buildings on the east side of Broad Street, the north side of Queen's Road and the south west side of Abbey Street (aka Abbey Street Car Park)	x	CV11 5NE	NBBC	WK251517
10 B		Land at Church Street, Nuneaton (aka Church Street Car Park)	x	CV11 4AS	NBBC	WK449878
11 B		Land and buildings lying to the East of Coton Road (aka Town Hall Car Park)	x	CV11 5AA	NBBC	WK88582
12 B		Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)	x	CV11 4AL	NBBC	WK428642
13 B		Land at Coton Road, Nuneaton (aka Riverside Car Park)	x	CV11 5AA	NBBC	WK450298
14 B		Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park)	x	CV11 5JF	NBBC	WK448678
15 B		Land to the south side of Bermuda/land lying to the east and west of Coventry Road, Chilvers Coton/land on the west side of a road leading from Coventry to Nuneaton and a balancing lake and land to the south of Bermuda Road, Nuneaton (aka Bermuda Balancing Lake)	✓		NBBC	WK448511/ WK284250/ WK345891
16 C		Recreation Ground at Easyboro Way, Nuneaton (aka Attleborough Recreational Ground)	✓	CV11 4PY	NBBC	WK449338
17 C		Land on south side of Lutterworth Road, Nuneaton (aka Pauls Land)	✓	CV11 6QA	NBBC	WK449027
18 B		Land lying to the north east of Braemer Way, Nuneaton, Land on the south west and north east sides of Greenmoor Road & Land lying to the south east side ofcroft road (aka Jubilee Sports Centre)	✓	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
19 B		Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton (aka Marsdale Drive)	✓		NBBC	WK342581/ WK355952
20 B		Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC	WK447355
21 B		Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road (aka Whittleford Park)	✓	CV10 8PY	NBBC	WK130458/ WK447033
22 E		Land on the south side of Marston Lane, Nuneaton (aka Bailey Park)	✓	CV12 8DR	NBBC	WK448180
23 E		Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓		NBBC	WK448258
24 E		Spitalfields 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the north-west side of Rye Piece Ringway, Bedworth & Zion Chapel, High Street Bedworth	x	CV12 8NF	NBBC	WK448878/ WK246825/ WK448801
25 E		Park Road (Car Park) - land on the east side of Park Road, Bedworth	x	CV12 8LH	NBBC	WK448511
26 F		Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barnacle Lane, Bulkington, Bedworth	✓		NBBC	WK448611/ WK448824(part)

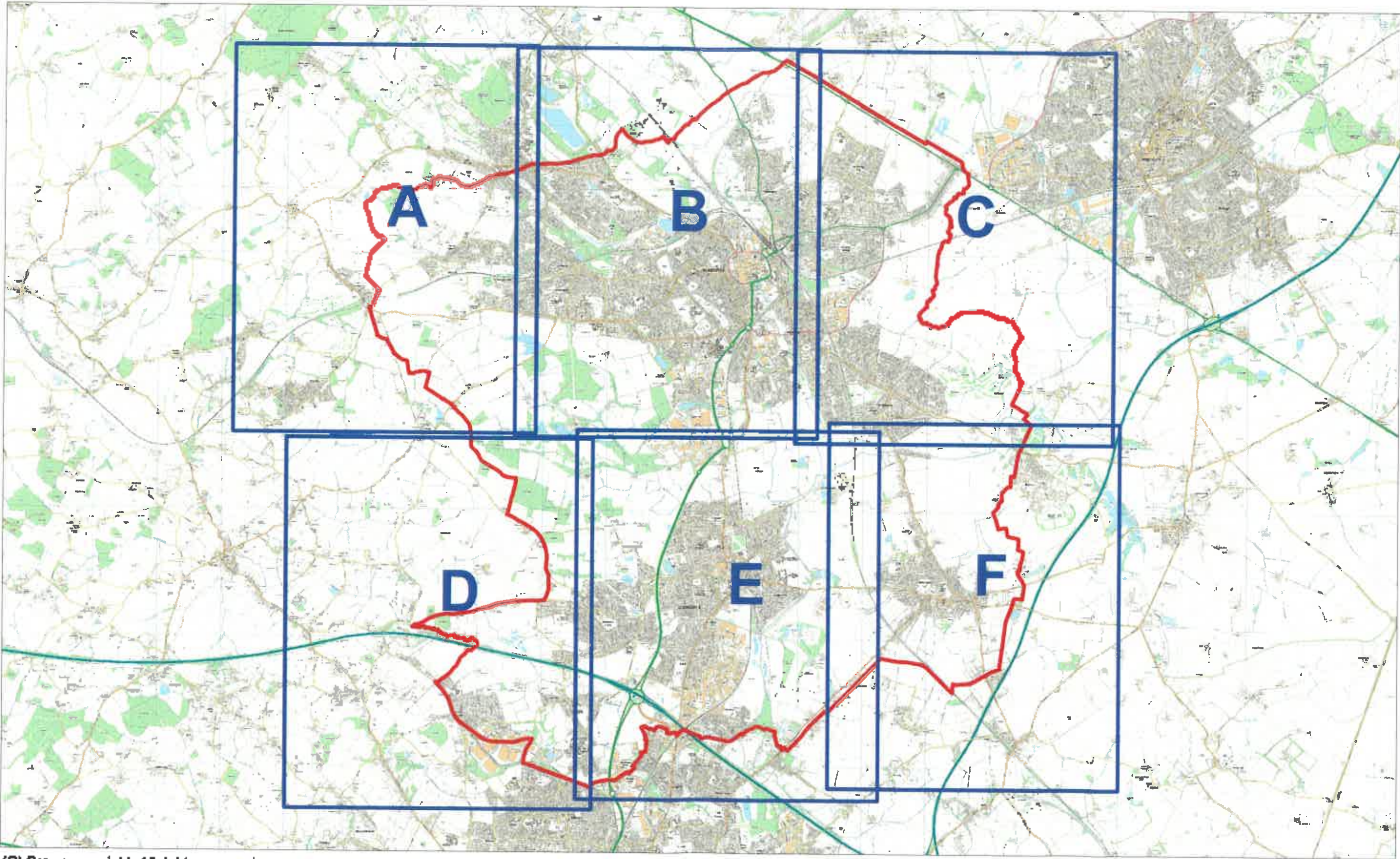
27 F	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	x	CV12 9RF	NBBC	WK448510/ WK448500
28 F	Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK448549
29 B	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK439320
30 B	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Remaden Avenue, Nuneaton (aka Stubbs Pool)	✓	CV10 9DJ	NBBC	WK448197/ WK448093
31 B	Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton (aka The Dingle)	✓	CV10 9DE	NBBC	WK373679/ WK448013
32 B	Land on the south side of Willow Road, Nuneaton	✓		NBBC	WK447731
33 D	Land on the West side of Blackberry Lane, Bedworth	✓		NBBC	WK137139
34 E	Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	✓	CV7 9EX	NBBC	WK450050
35 D	Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedworth	✓	CV7 8NG	NBBC	WK124031
36 E	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry (aka Silverstone Drive)	✓		NBBC	WK336223
37 E	St. Giles Recreational Ground - Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	x	CV7 9GZ	NBBC	WK143991/ WK154857
38 B	Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Marl.)	✓	CV10 9TD	NBBC	WK358453
39 A	Land south-east of Hickman Road, Galley Common, Nuneaton (aka Chaucer Drive)	✓	CV10 9SD	NBBC	WK339730
40 A	Nuneaton & North Works Group Riding for Disabled, Valley Road, Galley Common (CV10 9NJ) / land at Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NJ) (aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre)	x	CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
41 B/A	Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the north east side of Merlin Avenue, south east side of Freeland Rise, Whitleford and land lying to the West of Bucks Hill (aka Freeland Rise)	✓	CV10 9QF	NBBC	WK319146/ WK326554
42 B/A	Land on the east and west side of Sherbourne Avenue, Whitleford, Nuneaton (aka Farnham Drive/Poplar Tree Farm EA)	✓	-	NBBC	WK319145
43 A	Land on Galley Common, Nuneaton; land at Galley Common Nuneaton and Land on the south side of Plough Hill Road, Stockingford (aka North Field)	✓	CV10 9PZ	NBBC	WK238447/ WK238145/ WK324522
44 B	Land on the south side of Sherbourne Avenue, Nuneaton	x	CV10 9JH	NBBC	WK234444
45 D	Land on the south side of Cardigan Road, Bedworth (aka Anderton Road POS)	✓	CV12 0HD	NBBC	WK281821
46 E	Land and Buildings at Market End Farm and Orchard Farm, Smorrell Lane	✓	CV12 0GE	Private	WK360708
47 E	Newdigate Recreational Ground - Land at Smorrell Lane, Bedworth	✓	CV12 0JP	NBBC	WK449987
48 A	Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thornione Way)	✓	CV10 8NN	NBBC	WK32497
49 A	Kingswood Road Recreational Ground - Land on the North side of Ansley Road, Stockingford	x	CV10 9QG	NBBC	WK32497
50 B	Stockingford Recreational Ground - Land on the west side of Westbury Road, Nuneaton and land on the north east side of Grove Road, Nuneaton and land lying to the west of Nuneaton Road	✓	CV10 8JX	NBBC	WK448137/ WK448304/ WK317827
51 E	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8NW	NBBC	WK449032
52 E	Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way)	x	CV8 5TE	Private	WK394575
53 E	Land on the North side of Bulkington Road and land on the South side of Johnson Road/Alex Wilson Centre, 34 Nuneaton Road, Bedworth (CV12 8AL) and land lying to the west of Wootton Street and land at Elizabeth Centre, Johnson Road	✓	CV12 9BH	NBBC	WK169700/ WK448169/ WK250992/ WK448429
54 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBC	WK449032
55 E	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8NN	NBBC	WK449032
56 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8JT	NBBC	WK449032
57 E	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	x	CV12 8JG	NBBC	WK366034
58 E	Land at Arbury Avenue, Bedworth (aka Arbury Road POS)	x		NBBC	WK448598
59 E	Collycroft Recreational Ground - Land lying to the east of Amos Jacques Road, Collycroft, Bedworth and land to the west of Nuneaton Road/Alex Wilson Centre 34 Nuneaton Road Bedworth and land to the west of Nuneaton Road	✓		NBBC	WK295888/ WK460024/ WK448169/ WK317827
60 E	Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road)	x	CV12 0AL	NBBC	WK449846
61 C	Land lying to the north of Butternere Avenue, Nuneaton	✓	CV11 8EP	NBBC	WK210888

62	C	Land at Horselton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	x		NBBC	WK336798/ WK344807
63	C	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	x	CV11 6YB	NBBC	WK447654/ WK319282
64	C	Recreation Ground, The Long Shoot, Nuneaton, (CV11 6JH)	x	CV11 8JH	NBBC	WK446888
65	C	Land at Horselton Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Drive/Tavistock Way)	✓	CV11 6YL	NBBC	WK336798/ WK447654
66	C	Land on the east side of Changebrook Close and land on the west and east side of Pallott Drive, Nuneaton	✓	-	NBBC	WK345480/ WK309853
67	B	Land on the south side of Church Lane, Nuneaton (Cleaver Gardens/Sandon Fields)	✓	CV10 0HG	NBBC	WK448958
68	B	Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue, Nuneaton (aka Coronation Walk)	✓	CV10 0BN	NBBC	WK448096/ WK448091
69	B	Land at Bradestone Road, Nuneaton	x		NBBC	WK450498
70	B	Land on the north side of Donnithorne Avenue, Nuneaton (aka Caldwell Grange)	x		NBBC	WK452385
71	B	Land on the south side of Avenue Road, Nuneaton (aka Gale Fields)	✓		NBBC	WK452278
72	B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground)	✓		NBBC	WK448985
73	B	Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	x		NBBC	WK449842/ WK449818
74	B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton	x	CV11 5PQ	NBBC	WK447476
75	B	Land at Donnithorne Avenue, Nuneaton; land lying to the east of Raveloe Drive, Nuneaton; land on the east side of Marston Lane, Nuneaton and Land on the east and west sides of Marston Lane, Nuneaton (aka Marston Lane Fields)	✓	CV11 4RE	NBBC	WK452370/ WK452349/ WK449468/ WK449734
76	B	Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chivers Coton	✓	CV10 7BX	NBBC	WK448537/ WK344972
77	B	Riversley Park, Coton Road, Nuneaton	✓	CV11 6TY	NBBC	WK450206/ WK450173
78	B	Land at Sorrell Road, Nuneaton	✓	CV10 7AW	NBBC	WK450035
79	B	Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton	x	CV11 5TX	NBBC	WK450206/ WK450173
80	B	Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park)	✓	CV11 4LX	NBBC	WK448985
81	C	Crowhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 6XA	NBBC	WK370815
82	B	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	x	CV11 4PW	NBBC	WK310067
83	E	Land at Acacia Crescent, Bedworth	x		NBBC	WK448428
84	B	Land at Dunns Close, Nuneaton	x		NBBC	WK452330
85	E	Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry)	x		Private	WK394575
86	C	Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton	x		WCC	WK271645/ WK455358
87	E	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC	WK470015/ WK424958
88	D/E	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV7 9AH)	✓	CV7 9AH	Private	WK463626
89	E	Race Leys Infant School, Bedworth	x	CV12 8AD	WCC	Unregistered
90	E	Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)	✓	CV12 0HP	WCC	WK424335
91	E	All Saints Bedworth C of E Primary School and Nursery, Bedworth	x	CV12 8HP	WCC	Unregistered
92	F	Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth	x	CV12 9RT	WCC	WK79471
93	E	The Cannons C of E Primary School - aka Land and buildings on the South side of Derwent Road, Bedworth	✓	CV12 8RT	Private	WK225063
94	E	Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth	x	CV7 9FJ	WCC	WK33092
95	D	Keresley Newland Primary Academy and Keresley Newland School, , Grove Lane, Keresley, Coventry, (CV7 6JZ)	✓	CV7 6JZ	WCC	WK427632/ WK477207
96	D	Newdigate Primary School and Nursery - aka Land lying to the South of Smormal Lane, Goodyears End, Bedworth and Land lying to the South of smormal Lane Bedworth	✓	CV12 0HA	WCC	WK27604/ WK134659
97	D/E	Wheelwright Lane Primary School, Ash Green, Coventry	✓	CV7 9HN	WCC	WK425267
98	E	St Francis Roman Catholic School, Nicholas Street, Bedworth	x	CV12 8JN	Private	WK262596
"		Land lying to the North of Rye Piece Ringway, Bedworth			Private	WK476476

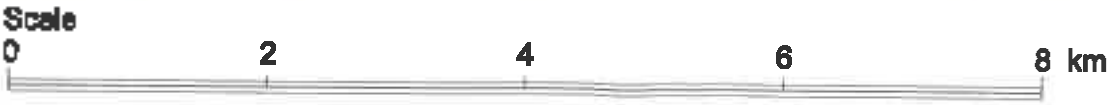
		Land on the East Side of Nicholas Street, Bedworth			WCC	WK171388
99 E		St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV7 9NS	WCC	WK171647
100 F		St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF)	✓	CV12 9PF	Private	WK461720
		Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth, CV12 9PF			Private	WK472707
101 E		St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9DA)	✓	CV12 9DA	Private	WK479304
102 B		Land adjoining St Thomas More Catholic School and Sixth Form College, Greenmoor Road, Nuneaton, CV10 7EX	✓	CV10 7EX	Private	WK478035
		St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX			Private	WK477630
		Arbury High School, Greenmoor Road, Nuneaton			Private	WK233418
103 B		Abbey Col E Infant School, Nuneaton	x	CV11 5EL	WCC	Unregistered
104 B		All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)	x	CV10 7AT	Private	WK461748
105 B		Camp Hill Primary School, aka Land to the South of Tuttle Hill, Camp Hill, Nuneaton	✓	CV10 9QA	WCC	WK409218
106 C		Chatwynd Junior School, aka Land lying to the South of Gipsy Lane, Nuneaton	✓	CV11 4SE	WCC	WK170501
107 B		Land at Judkins Quarry Tuttle Hill, Nuneaton (aka Recycling Centre)	✓	CV10 0HU	WCC	WK393091
108 B		Chilvers Coton Community Infant School, Frank Street, Nuneaton (CV11 5RB)	x	CV11 5RB	WCC	WK424955
109 B		Croft Junior School, aka Land lying to the west of Northumberland Avenue, Nuneaton	✓	CV10 8ER	WCC	WK239413
110 B		Gailey Common Infant School, Nuneaton	x	CV10 9NZ	WCC	Unregistered
111 C		Milby Primary School, aka Land lying to the East of Higham Lane, Nuneaton	✓	CV11 6JS	WCC	WK205172
112 B		Glendale Infant School, aka Land on the south side of Skye Close, Nuneaton	x	CV10 7LW	WCC	WK178493
113 B		Middlemarch School, Nuneaton	✓	CV10 7BQ	WCC	Unregistered
114 B		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	x	CV10 8HW	WCC	WK426673
		Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
115 B		Our Lady of the Angels Infant School and St Josephs RC First School at Coton Road, Nuneaton	x	CV11 5TY	Private	WK226511
		Our Lady of the Angels Infant School and St Josephs RC First School, Coton Road, Nuneaton, CV11 5TY			Private	WK477543
116 A		Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton	✓	CV10 8NL	Private	WK470637
		Land on the North Side of Ansley Road, Nuneaton			Private	WK189735
117 B		Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR			Private	WK471379
118 B		St Pauls C of E Primary School, Nuneaton	x	CV10 8NH		Unregistered
119 B		Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	x	CV10 0JX	Private	WK480568
		St. Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX			Private	WK449953
120 B		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	x	CV11 4QH	Private	WK468047
		Oakwood Secondary School, Morris Drive, Nuneaton			Private	WK468048
		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH			WCC	WK233776
121 C		Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 6HJ	x	CV11 6HJ	WCC	WK473130
		Land on the East Side of Windemere Avenue, Nuneaton			Private	WK131856
		St Nicolas C of E First School, Windemere Avenue, Nuneaton, CV11 6HJ			Private	WK473119
122 B		Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton	✓	CV10 0DR	WCC	WK149023/WK216447
123 B		Land at George Elliot School, Raveloe Drive, Nuneaton, CV11 4QP	✓	CV11 4QP	Private	WK458956
124 B		Wambrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton	✓	CV11 4LU	NBBC	WK448965
125 B		Etona College, Leicester Road, Nuneaton, CV11 6AA	✓	CV11 6AA	WCC	WK425515
126 B		Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	✓	CV10 0BJ	Private	WK465311
127 B		Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓	CV11 4QH	WCC	WK468047/WK468048/WK233776
128 B		The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Rad	✓	CV10 7PD	WCC	WK175243/WK425489
129 C		North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓	CV11 6BH	Private	WK428595

130	B	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓	CV11 4BE	Private	WK497842/WK497832
131	E	Bedworth Heath Nursery School, Globe Avenue, Bedworth, CV12 0DP	x	CV12 0DP	WCC	WK426282
132	D	Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
"		Exhall Grange Special School, Wheelwright Lane, Coventry			Private	WK440475
"		Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 8HP	✓	CV7 8HP	Private	WK450903
133	E	Quest Academy, North Side of Griff Lane, Nuneaton	✓	CV10 7SD	WCC	WK365844
134	E	Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton	x	CV12 8AG	WCC	WK240628
"		Race Leys Middle School, Barton Road, Bedworth, CV12 8HG		CV12 8HG	Private	WK465841
135	B	Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
"		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 8JY	WCC	WK42667
136	C	Whitstone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton	x	CV11 4SQ	WCC	WK23140
137	B	Attleborough Mills, Attleborough Road, Nuneaton (aka Holman Way)	x		Private	WK256088
138	B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton	x	CV11 6SS	Private	WK430022
139	B	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓	CV10 7SD	Private	WK447390
140	B	Halfords - land and buildings on the south side of Newtown Road, Nuneaton	x	CV11 5UT	Private	WK390614
141	B	Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre)	✓	CV10 7HU	Private	WK474729

Key for traveller encampment maps

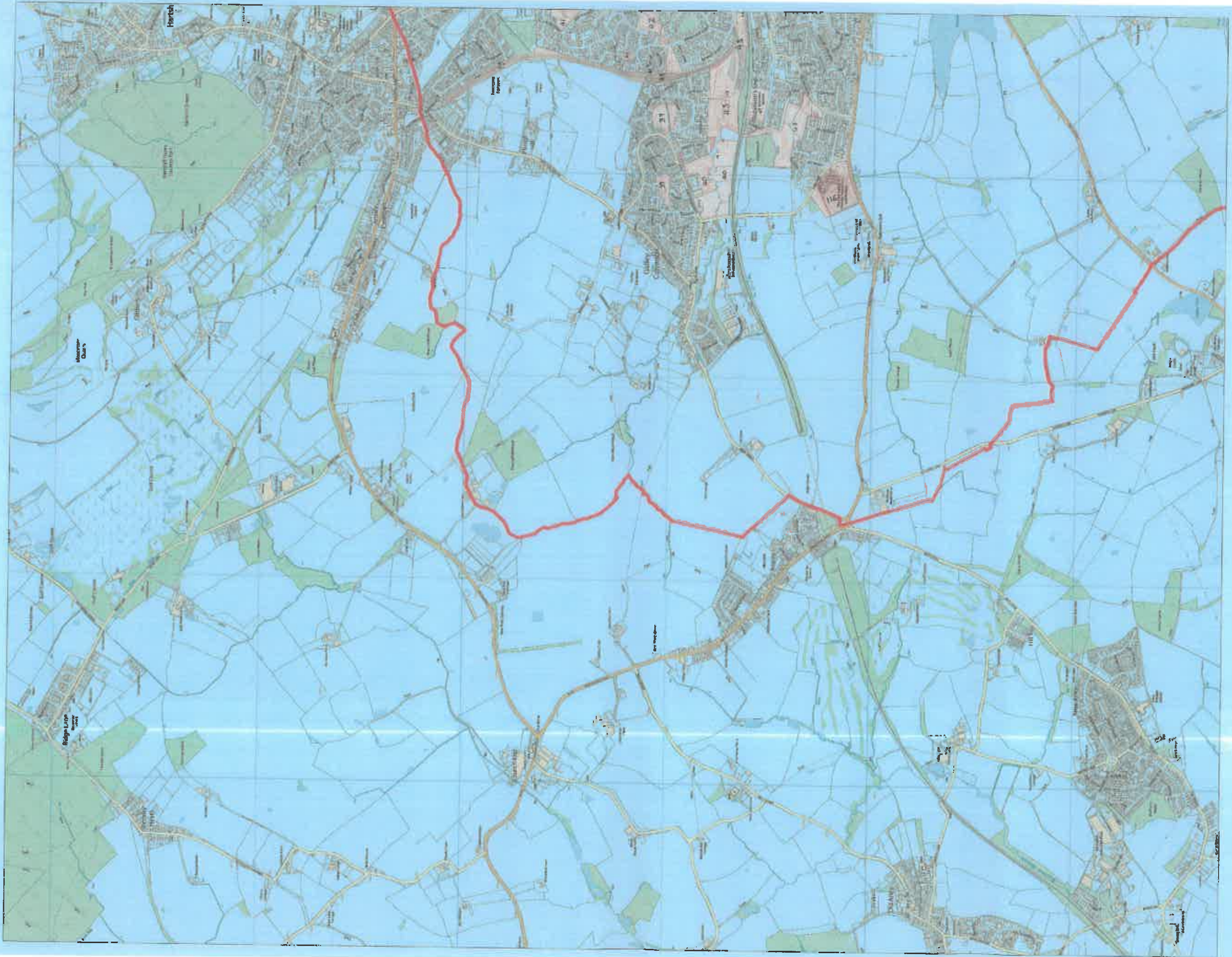


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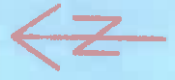
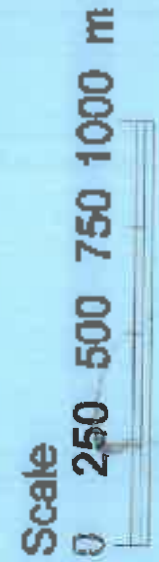


A

Northwest Nuneaton



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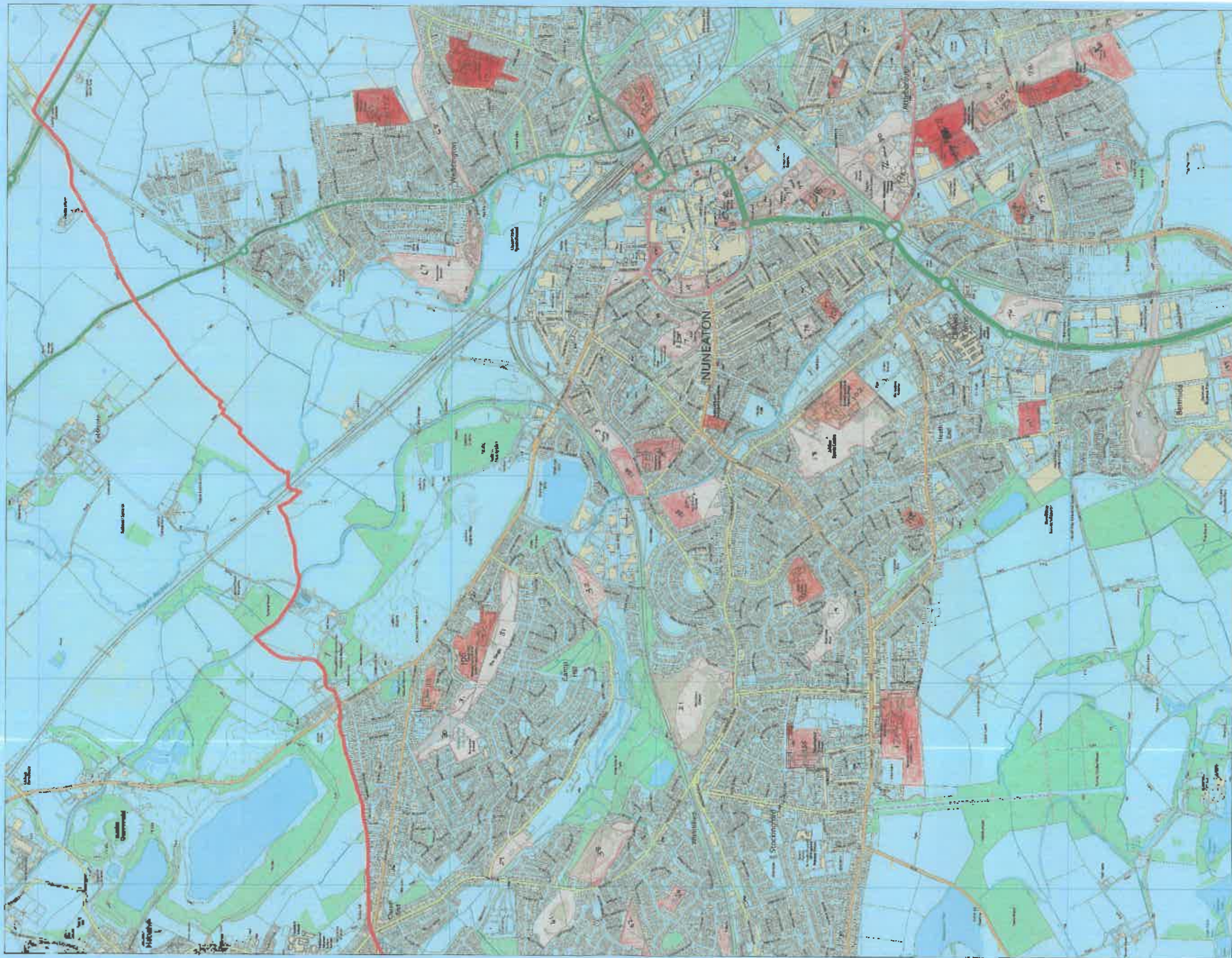




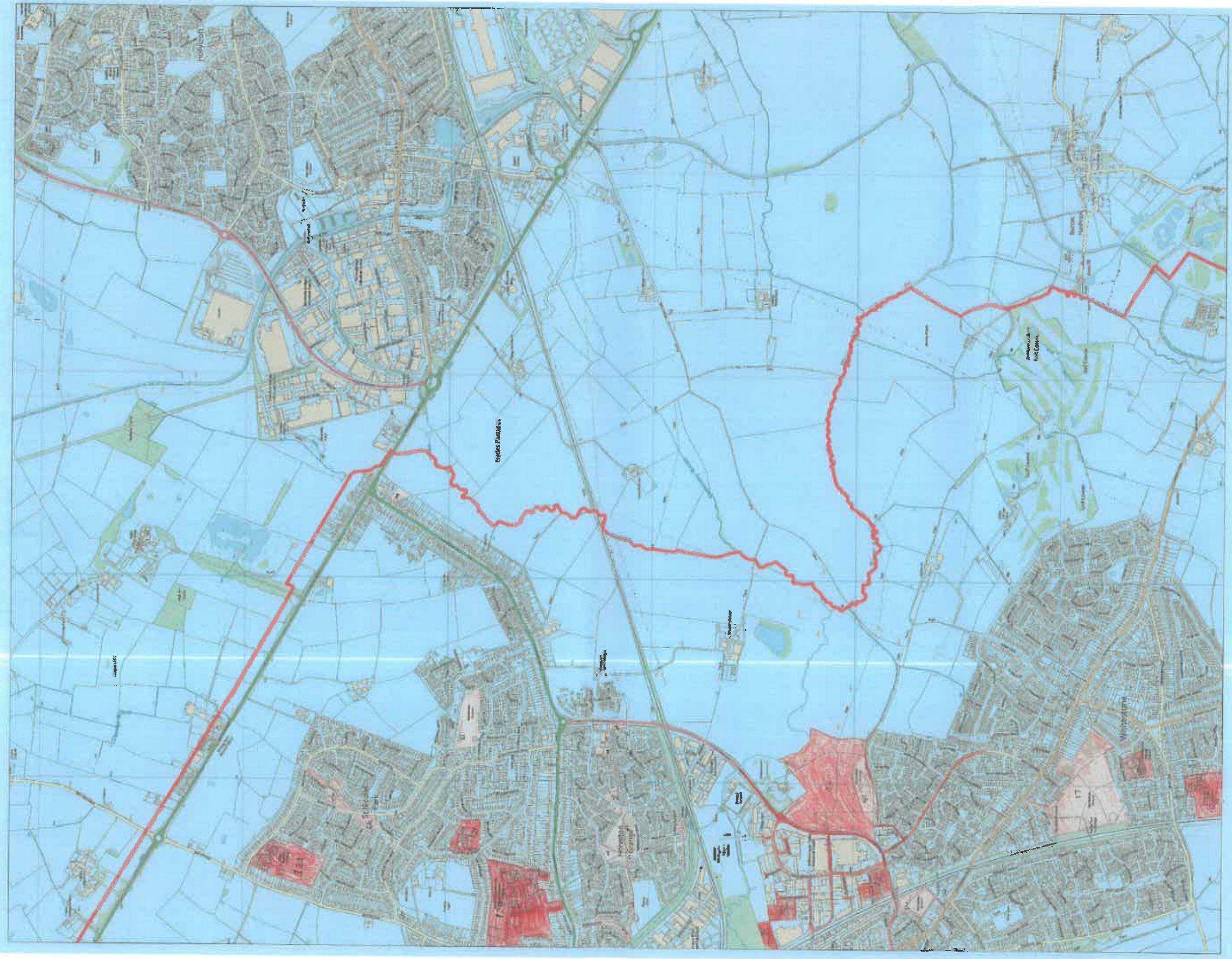
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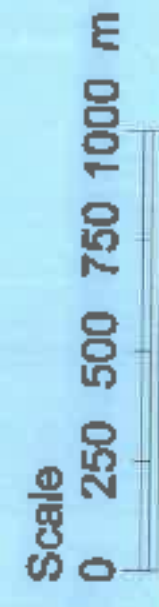
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Northeast Nuneaton

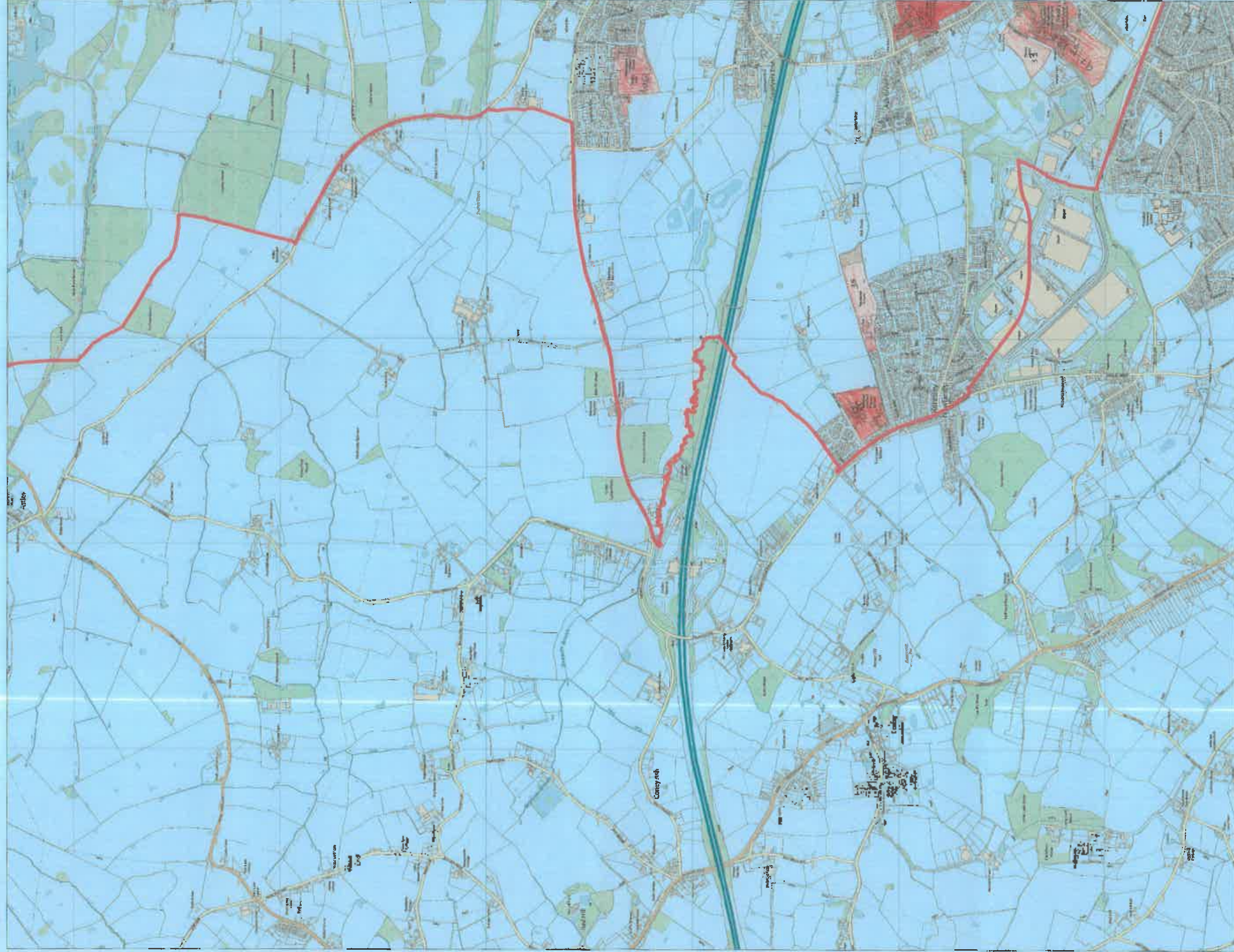


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Southwest Bedworth



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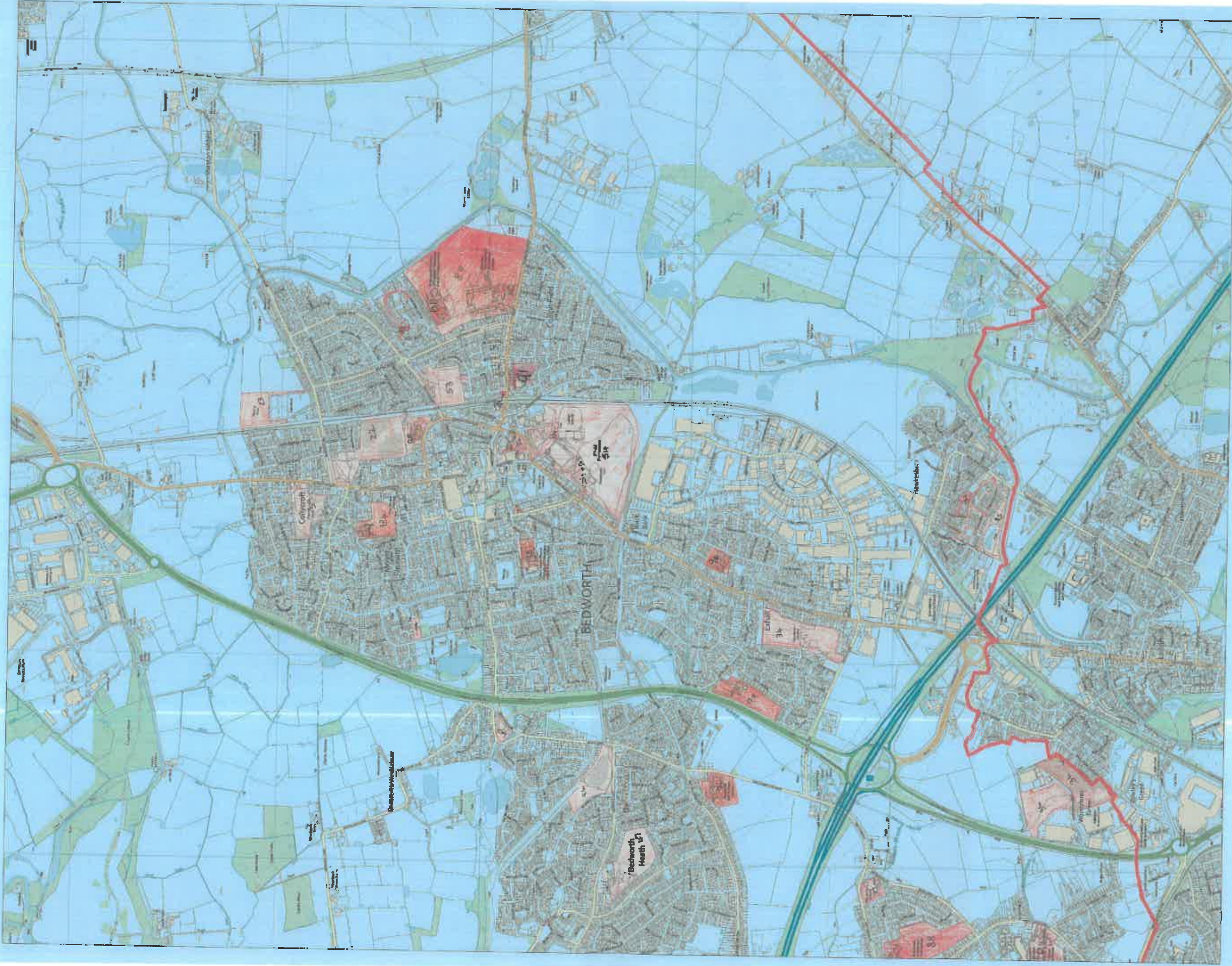


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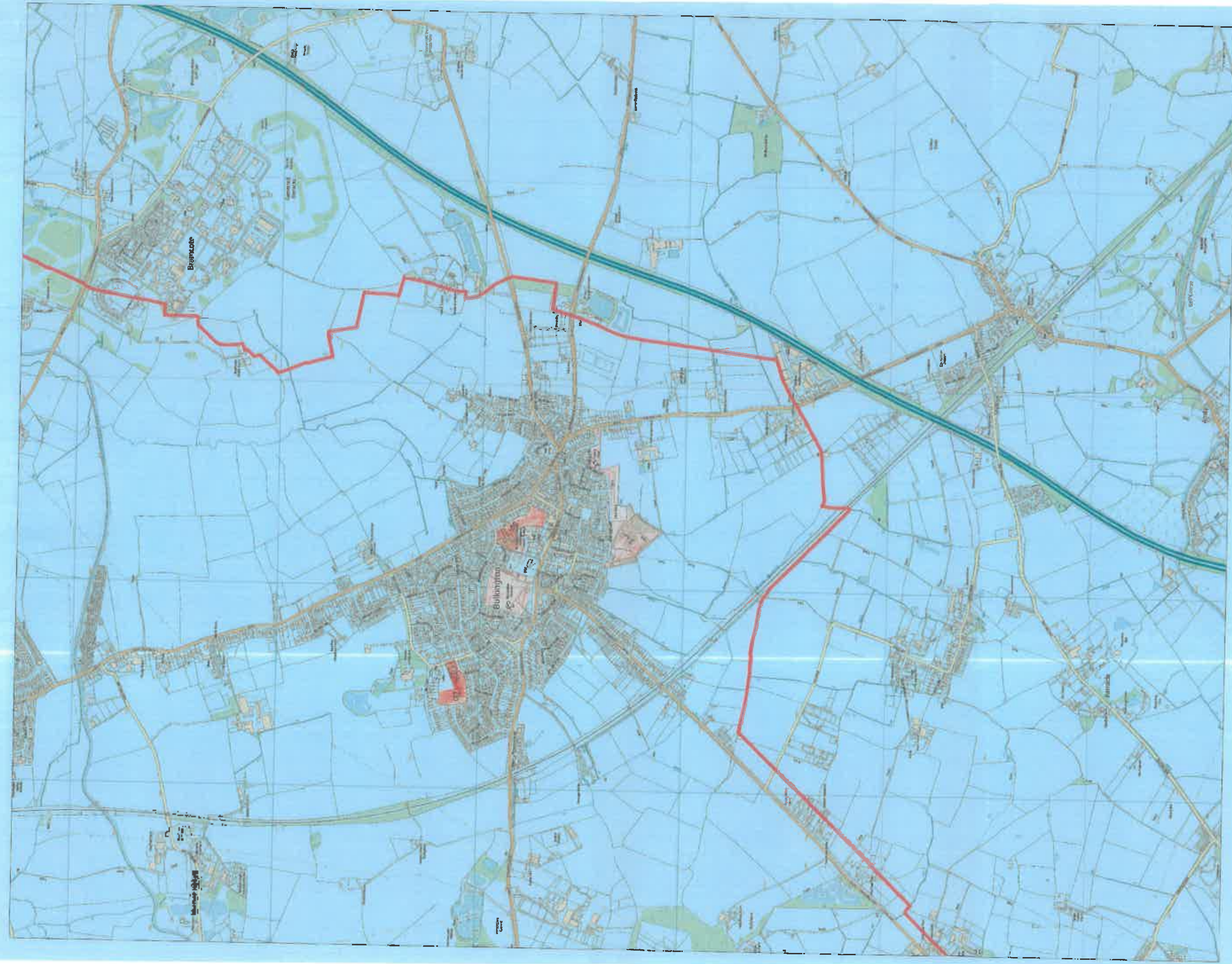
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[page]

South of Bedworth



Southeast Bedworth



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13/09/23

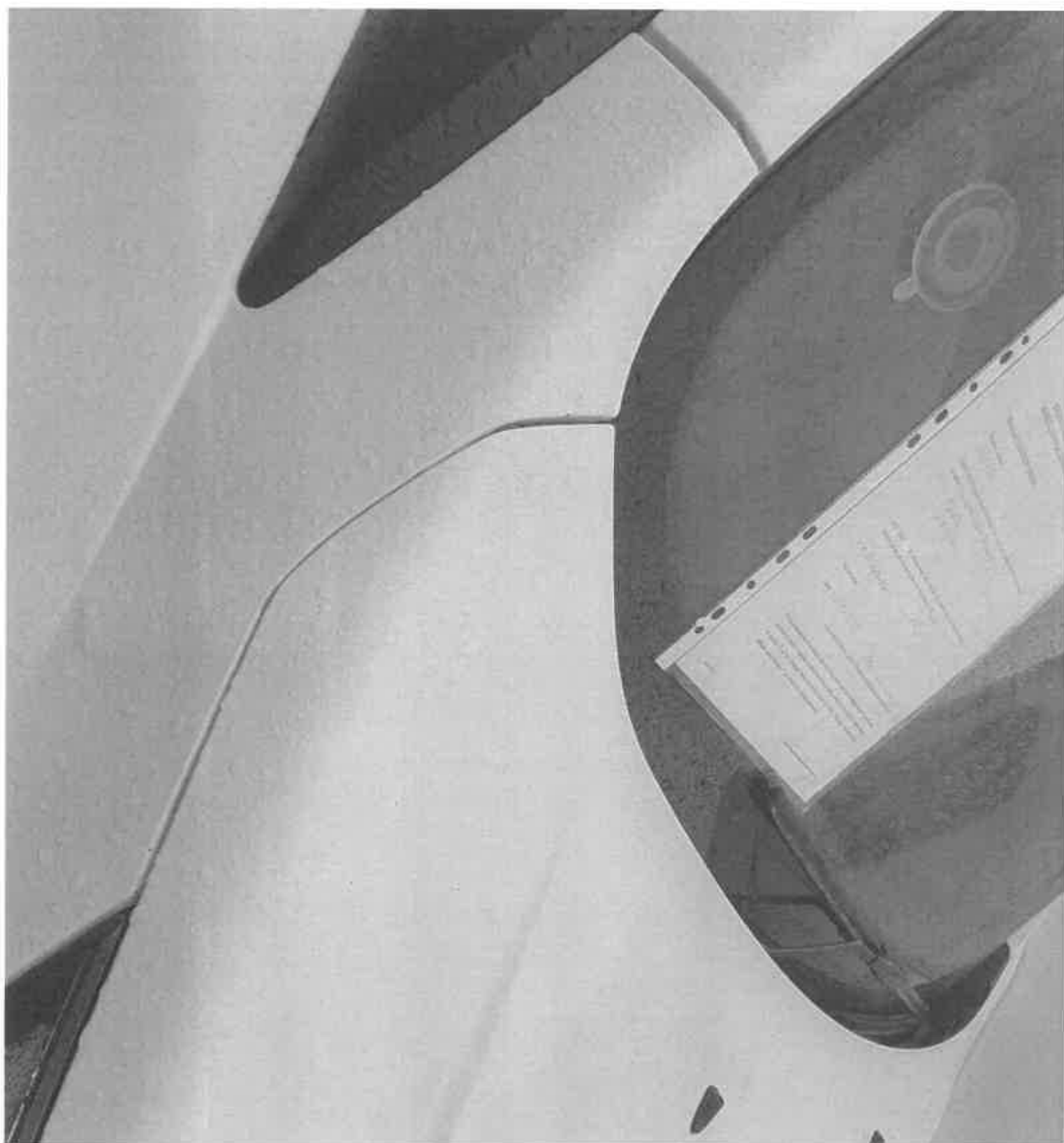
2368

















DD4 *RM*2376
DD4

12/09/2023

Social Caring Information Checklist

Encampment Site/Location: *Middlemarsh Recreation Ground*

Respondents' Names and Mobile Home Identity:

*Luke - CUR XWC*Officer: *AD*Date: *12/09/23*

1. When did you arrive on the land *Yesterday*
2. How did you get on the land *St Georges way*
3. What permission do you have to be on this land and evidence of this

Says Council provided 'bags'

4. Where did you come from prior to being on this land – previous 2 or 3 camps

5. How long were you on the previous land.

6. Are any of the travellers receiving medical treatment from a GP or local hospital?

YES



NO



- a) Name and address of GP/Consultant

- b) Any other information

Social Caring Information Checklist

Encampment Site/Location: Middle marsh recreation Gd.

Respondents' Names and Mobile Home Identity:

YD 632PW

Officer: DD Date: 12/04

1. When did you arrive on the land... Yesterday
2. How did you get on the land... —
3. What permission do you have to be on this land and evidence of this...
—

4. Where did you come from prior to being on this land – previous 2 or 3 camps
—

5. How long were you on the previous land.
—

6. Are any of the travellers receiving medical treatment from a GP or local hospital?

YES

☐

NO

☒

- a) Name and address of GP/Consultant

NA

- b) Any other information

NA

Social Caring Information Checklist

Encampment Site/Location:

E F65 VFN

Respondents' Names and Mobile Home Identity:

.....

Officer: *DD*

Date: *12/09*

1. When did you arrive on the land... *Yesterday*
2. How did you get on the land
3. What permission do you have to be on this land and evidence of this

NA

4. Where did you come from prior to being on this land – previous 2 or 3 camps
-
-
-

5. How long were you on the previous land.
-
-

6. Are any of the travellers receiving medical treatment from a GP or local hospital?

YES

☐

NO

☒

- a) Name and address of GP/Consultant
-

- b) Any other information
-

Social Caring Information Checklist

Encampment Site/Location: Middle Marsh

Respondents' Names and Mobile Home Identity:

No name - SB65 VGR

Officer: DD Date: 12/09/23

1. When did you arrive on the land St Georges Way - Yesterday
2. How did you get on the land
3. What permission do you have to be on this land and evidence of this

N/A

4. Where did you come from prior to being on this land – previous 2 or 3 camps

5. How long were you on the previous land.

6. Are any of the travellers receiving medical treatment from a GP or local hospital?

YES

☐

NO

☒

- a) Name and address of GP/Consultant

N/A

- b) Any other information

N/A

Social Caring Information Checklist

Encampment Site/Location: Middlemarsh

Respondents' Names and Mobile Home Identity:

BK 21 870 - No name

Officer: DD Date: 11/09

1. When did you arrive on the land. Yesterday
2. How did you get on the land
3. What permission do you have to be on this land and evidence of this

NA

4. Where did you come from prior to being on this land – previous 2 or 3 camps

—

5. How long were you on the previous land.

—

6. Are any of the travellers receiving medical treatment from a GP or local hospital?

YES



NO



- a) Name and address of GP/Consultant

NA

- b) Any other information

NA

DD5 DM

2382

DD5

13/09/23

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

RAZO NEY

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way
Nuneaton
CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

20 23

and not return.

Dated 12/09/2023

DM.....

Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPEERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

BK21520 - Caravan

BK21520 - Ford Truck

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way

Nuneaton

CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

2023

and not return.

Dated 12/09/2023



Authorized Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPER'S TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

CK13 VGH

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at the north side of St Georges Way

Nuneaton

CV10 7BX


AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13/09/2023

20

and not return.

Dated 12/09/2023

.....


Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

YH65AHU

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way
 Nuneaton
 CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

9am

on 13 September

2023

and not return.

Dated 12/09/2023

[Signature]

.....
 Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

BF14YKC

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way
 Nuneaton
 CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

20 23

and not return.

Dated 12/09/2023

[Signature]

Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPER'S TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

C12 XWC

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north of St Georges Way
 Nuneaton
 CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

2023

and not return.

Dated 12/09/2023

[Signature]

.....
 Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

SB65 VGR

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way

Nuneaton

CV10 7 BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

9am

on 13 September

20²³

and not return.

Dated 12/09/2023

PR

.....
 Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

BW70 EWC

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way

Nuneaton

CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

20 23

and not return.

Dated 12/09/2023

[Signature]

.....
 Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

R410 LGC

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

The north side of St Georges Way
 Nuneaton
 CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September 2023

20

and not return.

Dated 12/09/2023

Bm

.....
 Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

YH58 DVF

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way
 Nuneaton
 CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September 2023

20

and not return.

Dated 12/09/2023

.....
 [Signature]

Authorized Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

LX OF EWF

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way
 Nuneaton
 CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

20 23

and not return.

Dated 12/09/2023



.....
 Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

MV23 KDKS

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at the north side of St Georges Way, Nuneaton

CV10 7BY

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

20 23

and not return.

Dated 12/09/2023

.....
 [Signature]

Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNLTON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 71 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (notice(■))

YD63 2PW

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at the north side of St Georges Way, Newton

CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

20 23

and not return.

Dated 12/09/2023

Q7L

Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

00850 Dale

13/09/23

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

BY61PVE - 00

BUG1PUE

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

the north side of St Georges Way
 Nuneaton
 CV10 7BX

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 13 September

2023

and not return.

Dated 12/09/2023



.....
 Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

IN THE COMMISSION AREA OF WARWICKSHIRE
PETTY SESSIONS AREA OF WARWICKSHIRE
WARWICKSHIRE MAGISTRATES' COURT (Code 2904 or 6904)

To: All occupants of vehicles (including caravans) on occupied land without the consent of the Owner of land at Middlemarch Playing Fields, Middlemarch Road, Nuneaton

COMPLAINT has this day been laid before me, the undersigned, by Nuneaton and Bedworth Borough Council ("the Council"), of Town Hall, Nuneaton, CV11 5AA WHO STATES THAT a number of caravans (including other vehicles) are now stationed on occupied land without the consent of the Owner/Occupier known as Middlemarch Playing Fields, Middlemarch Road, Nuneaton as outlined in red on the attached plan which is within the area of the Council in contravention of a direction given by the Council under section 77 of the Criminal Justice and Public Order Act 1994 ("the Act").

AND the Council has applied to the Magistrates Court for an order under section 78 of the Act requiring any vehicle (including caravans) which are so stationed on the land to be removed together with any other property present on the land and any person residing in the vehicle and for the order to authorise the Council to take such steps as are reasonably necessary to ensure that the order is complied with and for the summons to be directed to all occupants of vehicles (including caravans) stationed on the land without naming them.

YOU ARE HEREBY SUMMONED to appear before the Coventry Magistrates Court sitting at Coventry Magistrates Court of 60 Little Park Street, Coventry, CV1 2SQ on Monday 18th September 2023 at 2pm to answer the said complaint.

Dated this 13th day of September 2023

*Clerk to the Justices/Designated Officer/Justice of the
Peace for the Coventry & Warwickshire Local Justice Area*















NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

YD63 ZPW

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

Land to the north of St George's Way
 Nuneaton

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by

on 15th September

9am
 20
 23

and not return.

Dated 14th September

[Signature]

Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NUNEATON AND BEDWORTH BOROUGH COUNCIL
NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

SE17 SKV

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

Land to the north of St George's Way
 Nuneaton

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 15th September

2023

and not return.

Dated 14th September 2023

[Signature]

Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.

NOTICE TO UNAUTHORISED CAMPERS TO LEAVE LAND
SECTION 77 CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

TO ALL OCCUPANTS OF VEHICLE

including (name(s))

SK21 E/V

TAKE NOTICE that the Council is satisfied that persons are residing in a vehicle or vehicles on land at

The north of St George's Way
 Nuneaton

AND THAT all such persons must leave the land and remove from the land the vehicle or vehicles and any other property they have with them by 9am

on 15th September

2023

and not return.

Dated 14th September 2023

[Signature]

Authorised Officer on behalf of Nuneaton and Bedworth Borough Council

If this direction is not complied with, the Council may apply to the Magistrates' Court to seek an order to remove vehicles, persons and other property occupying the land in contravention of section 77 of the Criminal Justice and Public Order Act 1994. You may also commit an offence under section 77 for which you may be prosecuted.





Statement of: Andrew Hibbs

Age of witness: over 18

On the 12 September 2023 at 10.30am I visited Middlemarch Playing Fields, Middlemarch Road, Nuneaton with David Dale after a complaint was received from the public regarding an unauthorised encampment of travellers. David and I viewed the site from a distance and noted approximately 10 to 12 caravans and various vans. On the 13 September 2023 I visited the same site at 9.35am to ascertain whether the site was vacant and noted from a distance that the caravans and various vans were still present.

This statement (consisting of one page) is true to the best of my knowledge and belief, and I make it knowing that if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signed: AJ Hibbs

Date: 13 September 2023

IN THE COMMISSION AREA OF WARWICKSHIRE
PETTY SESSIONS AREA OF WARWICKSHIRE
WARWICKSHIRE MAGISTRATES' COURT

COMPLAINT having been made by NUNEATON AND BEDWORTH BOROUGH COUNCIL of Town Hall, Nuneaton, Warwickshire, CV11 5AA WHO STATES that a number of vehicles (including caravans) were on 18 September 2023 stationed on occupied land without the consent of the occupier on Middlemarch Playing Fields, Middlemarch Road, Nuneaton as outlined in red on the attached plan and being within the area of the Council in contravention of a direction given by the Council under section 77 of the Criminal Justice and Public Order Act 1994.

IT IS ADJUDGED THAT the complaint is true and it is ordered that any vehicle (including a caravan) referred to in the schedule below which is stationed on occupied land without the consent of the occupier on Middlemarch Playing Fields, Middlemarch Road, Nuneaton to be removed forthwith together with any other property present on the land and any person residing in it.

AND THAT Nuneaton and Bedworth Borough Council acting by its officers and servants is hereby authorised to enter upon the land specified in this order and remove any said vehicle together with any other property present on the land and any person residing in it and to use tractors, lorries or any other vehicles and cranes for carrying out the removal.

Schedule

<u>Registration</u>	<u>Description</u>	<u>Family Name</u>
MV23 BKJ	Ford	Unknown
R410 LGC	Unknown	Unknown
BV61 PUE	Unknown	Unknown
CV12 XWC	Ford	Unknown
CK13 UGH	Vauxhall	Unknown
BF14 YKC	Ford	Unknown
YD63 ZPW	Volkswagen	Unknown
LX07 EWF	Unknown	Unknown
EF65 YPN	Unknown	Unknown
SB65 VGR	Mercedes	Unknown
BK21 SZO	Unknown	Unknown
RA20 NEY	Ford	Unknown
YH85 AHU	Unknown	Unknown
C12 XWC	Unknown	Unknown
BW70 EWC	Unknown	Unknown
YH58 DVF	Ford	Unknown
SE17 SKV	Ford	Unknown

SK21 EYV
CV10 7BX
YS65 OKU
MF22 XCO

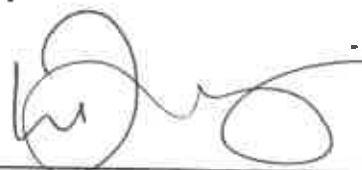
Unknown
Unknown
Ford
Ford

Unknown
Unknown
Unknown
Unknown

And the removal of any vehicle or other property which is so present on the land and any person residing in it.

All unknown persons.

Dated the 18th day of September 2023



(L. DOWLING)

Clerk to the Justices/Designated
Officer/Justice of the Peace for the
Coventry & Warwickshire Local Justice
Area



case id	date created	date completed	citizen name	methodOfC	siteLocation	descriptionOfIssue
						<p>Reports of Travellers located in area. Dogs are off the lead in the area near the park. 2 dogs have gone into the garden at [REDACTED] and have attacked a cat. They have Mauled and killed the cat. Customer was very upset and worried about her own dogs and children. I advised that dangerous dogs are dealt with by the police, and she needs to contact them. Customer advised that she has contacted the police and they have told her to contact the council. Customer described the dogs as spaniels (Different dogs to the 2 Jack Russell's reported at Middlemarch school). Can this please be looked into/ the police contacted by a member of staff as the public are at risk of these dogs attacking again.</p>
NBIE548186540	19/09/2023 11:18	19/09/2023 11:18	[REDACTED]	Telephone	Middlemarch Recre:	<p>Customer that called is [REDACTED]</p> <p>Customer has called regarding Travellers at Middlemarch Recreation Ground. Reports that they are still in the location. Reports that they have dogs roaming the area off the lead, this is preventing people</p>
NBIE547965980	18/09/2023 14:43	18/09/2023 14:43	[REDACTED]	Telephone	Middlemarch Recre:	<p>coming out of their properties.</p> <p>There are around 15 vehicles and caravans combined on the park as well as horses, sheep and dogs free</p>
NBIE547395645	15/09/2023 13:50	15/09/2023 13:50	[REDACTED]	Telephone	Middlemarch Recre:	<p>roaming.</p> <p>Customer called to update you of the travelers encampment/site you are already aware of/dealing with. There are now 35 caravans & the Travellers are cutting down trees, wrecking Middlemarch recreational park.</p>
NBIE546530110	12/09/2023 14:25	12/09/2023 14:25	[REDACTED]	Telephone	Middlemarch recrea	

NBIE546252627	11/09/2023 15:40	11/09/2023 15:40	[REDACTED]	Telephone	Middlemarch Recre.	At least 1 caravan came onto the park approximately an hour ago but there could be more by now.
						ABANDONED CARAVAN
						WHITE VAN
NBIE521800413	06/06/2023 10:32	06/06/2023 10:32	[REDACTED]	Telephone	AT THE REAR OF [REDACTED]	YOUTHS ARE USING THE CARAVAN



























































Statement on behalf of the Claimant

First Statement of Waheeda Sheikh
Exhibit 'WS1 -WS2'
Dated: 30 September 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2019-000616

B E T W E E N :

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE BOROUGH
OF NUNEATON AND BEDWORTH

Defendants

Exhibit 'WS2'

Extraordinary Council

Report Summary Sheet

Date: 17th January 2024

Subject: Up-date on the Gypsy and Traveller Site Allocations Development Plan Document (DPD); Consideration of the Planning Inspector's Report and to request adoption of the amended DPD.

Portfolio: Cabinet Member for Planning and Regulation (Councilor R. Smith)

From: Assistant Director Planning

Summary:

The purpose of this report is to update Members on the Gypsy and Traveller Site Allocations Development Plan Document (DPD); Consideration of the Planning Inspector's Report on the Examination of the DPD and to recommend to Council to approve the DPD now that the Secretary of State – Planning Inspectorate has confirmed the Document is considered sound (appendix A).

This is with the caveat that any minor typing or page numbering errors can be carried out by Delegated Powers of the Assistant Director for Planning in consultation with the Portfolio Holder for Planning and Regulation.

Recommendations:

It be recommended to Council that:

- The public consultation responses be noted.
- The Gypsy and Traveller Site Allocations Development Plan Document (DPD) published in January 2022 as amended (appendix B) by:
 - The Inspectors final report (appendix A);
 - The schedule of Main Modifications recommended by the Inspector (appendix C); and
 - The schedule of Additional Modifications (appendix D)

be adopted.

- The above is subject to making available as soon as is practicable and in accordance with regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended):
 - The Inspectors Final Report.
 - The DPD.
 - An Adoption Statement.
 - The Sustainability Report and Addendum and Habitats Regulations Assessment and Main Modifications Habitats Regulations Assessment.
 - Details of where the DPD will be available for inspection and the places and times at which the document can be inspected.
 - Send a copy of the Adoption Statement to any person who has asked to be notified of the adoption of the DPD.
 - Send a copy of the Adoption Statement to the Secretary of State.
- The Assistant Director for Planning in consultation with the Portfolio Holder for Planning and Regulation be given Delegated Authority to make any further amendments such as minor typing or page numbering errors.
- The adopted Local Plan map be amended to include the site allocations.
- The report be marked 'not for call in' as provided for in paragraph 15(f) of the Overview and Scrutiny Procedure Rules in Part 4 of the Constitution.
- The DPD will supersede the third bullet point of Adopted Borough Plan 2011-2031 Policy DS4 – Overall development needs and supersede all of Policy H3 – Gypsies and Travellers.

Options:

- For Council to approve the amended Gypsy and Traveller Site Allocations Development Plan Document (DPD) (including the Inspectors Final Report and Modifications required by the Planning Inspector). Subject to the Assistant Director for Planning in consultation with the Portfolio Holder for Planning and Regulation be given Delegated Authority to make any further amendments such as minor typing or page numbering errors
- Not to endorse the recommendations but recommend an alternative.

Reasons:

To ensure the Council has Policy in place to allocate sites to meet the Borough's identified need for Gypsy and Traveller pitches and Showpersons plots and to support and in part supersede Policies in the existing Adopted Borough Plan and in line with the timetable established within the amended Local Development Scheme.

Consultation undertaken with Members/Officers/Stakeholders

Consultation with the Portfolio Holder – Planning and Regulation and The Chair of the Business, Regeneration and Planning Overview and Scrutiny Panel.

Strategic Director for Public Services and Assistant Director for Planning.

The Document has been taken to the Borough Plan Committee and Cabinet and Council at the appropriate stages.

Consultation with key stakeholders and public consultation for Issues and Options and Publication stages, including some further consultation with statutory consultees between the stages. Final consultation of the requested Main and Additional Modifications.

Subject to call-in: No

Ward relevance: All

Forward plan: Yes.

Adoption of the DPD is a Key Decision. Unfortunately, the DPD has not shown on the Forward Plan for the requisite period, in the belief that the Inspector's report would not be received until the New Year. Because of this and the need to have the DPD adopted at the earliest opportunity, the Urgency Procedure, as set out in the Council's Constitution, has been utilised. The Chair of the Business, Regeneration and Planning Overview and Scrutiny Panel has been consulted and a notice placed on the Council's website and public notice boards.

Building a Better Borough Aim: All

Building a Better Borough Priority: All

Relevant statutes or policy:

Planning and Compulsory Purchase Act 2004 (as amended) and the associated Town And Country Planning (Local Planning) (England) Regulations 2012 (as amended).

National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

Equalities Implications: None

Human resources implications:

The timetable accounts for existing known staffing and resource levels.

Financial implications:

The costs associated with progressing the DPD have been met within existing budgets. If any additional work is required/necessary, this has not been accounted for and may result in budget pressure for 2023/24.

Health Inequalities Implications: None**Section 17 Crime & Disorder Implications:** None**Risk management implications:**

If the DPD is not adopted, the Council cannot demonstrate a Five-Year Supply of pitches and plots.

Environmental implications:

The DPD document needs to align with the latest Government guidance on preserving and enhancing the natural environment.

Legal implications: None**Contact details:**

Maria Bailey
 Assistant Director for Planning
 024 7637 6144
maria.bailey@nuneatonandbedworth.gov.uk

Jacqui Padbury
 Principal Planning Policy Officer
 024 7637 6162
jacqueline.padbury@nuneatonandbedworth.gov.uk

AGENDA ITEM NO. 6NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Council – 17h January 2024

From: Assistant Director - Planning

Subject: Up-date on the Gypsy and Traveller Site Allocations Development Plan Document (DPD); Consideration of the Planning Inspector's Report and to request adoption of the amended DPD.

Portfolio: Planning and Regulation — Councillor R. Smith

Building a Better Borough Aim: All

Building a Better Borough Priority: All

1. Purpose of Report

- 1.1 The purpose of this report is to update Members on the Gypsy and Traveller Site Allocations Development Plan Document (DPD); Consideration of the Planning Inspector's Report on the Examination of the DPD and to recommend to Council to approve the DPD now that the Secretary of State – Planning Inspectorate has confirmed the Document is considered sound (Appendix A).
- 1.2 This is with the caveat that any minor typing or page numbering errors can be carried out by Delegated Powers of the Assistant Director for Planning in consultation with the Portfolio Holder for Planning and Regulation.

2. Recommendations

It be recommended to Council that:

- 2.1 The public consultation responses be noted.
- 2.2 The Gypsy and Traveller Site Allocations Development Plan Document (DPD) published in January 2022 as amended (Appendix B) by:
- The Inspectors Final Report (Appendix A);
 - The schedule of Main Modifications recommended by the Inspector (Appendix C); and
 - The schedule of Additional Modifications (Appendix D)

be adopted.

- 2.3 Subject to 2.2 make available as soon as is practicable and in accordance with regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended):
- The Inspectors Final Report.
 - The DPD.
 - An Adoption Statement.
 - The Sustainability Report and Addendum and Habitats Regulations Assessment and Main Modifications Habitats Regulations Assessment.
 - Details of where the DPD will be available for inspection and the places and times at which the document can be inspected.
 - Send a copy of the Adoption Statement to any person who has asked to be notified of the adoption of the DPD.
 - Send a copy of the Adoption Statement to the Secretary of State.
- 2.4 The Assistant Director for Planning in consultation with the Portfolio Holder for Planning and Regulation be given Delegated Authority to make any further amendments such as minor typing or page numbering errors.
- 2.5 The adopted Local Plan map be amended to include the site allocations.
- .
- 2.6 The report be marked 'not for call in' as provided for in paragraph 15(f) of the Overview and Scrutiny Procedure Rules in Part 4 of the Constitution.
- 2.7 The DPD will supersede the third bullet point of Adopted Borough Plan 2011-2031 Policy DS4 – Overall development needs and supersede all of Policy H3 – Gypsies and Travellers.

3. Background

- 3.1 The purpose of this DPD is to allocate sites to meet the Borough's identified need for Gypsy and Traveller pitches and Showpersons plots.
- 3.2 The Publication version of the Gypsy and Traveller Development Plan Document (DPD) was published and consulted upon between the 28th January 2022 and the 25th March 2022 and the responses received were considered before the DPD and supporting documents were submitted for Examination to the Secretary of State (Planning Inspectorate on the 29th June 2022. The Hearing was held with the Planning Inspector on the 27th October 2022.

- 3.3 As part of the Examination process, amendments to the Publication were agreed with the Inspector which has resulted in amendments to the DPD. For clarity, these Modifications were split between 'Main Modifications' and 'Additional Modifications'. 'Main Modifications' (Appendix C) are those recommended by the Inspector to make the DPD sound and legally compliant. 'Additional Modifications' (Appendix D) are those which do not materially affect the Policies in the DPD, but which are generally minor factual updates; corrections of any errors or which are considered necessary for clarity.
- 3.4 Once adopted the DPD will supersede the third bullet point of Adopted Borough Plan 2011-2031 Policy DS4 – Overall development needs and supersede all of Policy H3 – Gypsies and Travellers.
- 3.5 The Planning and Compulsory Purchase Act 2004 is the legislation which sets out the process for Local plans and states:
 "Section 23 Adoption of local development documents ...
 (2) If the person appointed to carry out the independent examination of a development plan document recommends that it is adopted, the authority may adopt the document—
 (a) as it is, or
 (b) with modifications that (taken together) do not materially affect the policies set out in it.
 (2A) Subsection (3) applies if the person appointed to carry out the independent examination of a development plan document—
 (a) recommends non-adoption, and
 (b) under section 20(7C) recommends modifications ("the main modifications").
 (3) The authority may adopt the document—
 (a) with the main modifications, or
 (b) with the main modifications and additional modifications if the additional modifications (taken together) do not materially affect the policies that would be set out in the document if it was adopted with the main modifications but no other modifications.
 (4) The authority must not adopt a development plan document unless they do so in accordance with subsection (2) or (3).
 (5) A document is adopted for the purposes of this section if it is adopted by resolution of the authority."
- 3.6 The Inspector in this case has recommended that the plan is unsound unless adopted with the Main Modifications as set out in Appendix C. Additional Modifications have also been carried out (Appendix D). No other changes can be made to the plan which alter its contents (beyond minor changes). Any changes which are significant would prevent the Council being able to adopt the plan by virtue of Section 23(4) above.

- 3.7 The only alternative option available to the Council would be to recommend withdrawal of the plan pursuant to section 22 of the Act. This is outlined below:

“22 Withdrawal of local development documents

(1) A local planning authority may at any time before a local development document is adopted under section 23 withdraw the document.”

4 Consultation and responses received to the Main and Additional Modifications and communication with the Planning Inspectorate

- 4.1 The Modifications were consulted on between 4th September 2023 to the 16th October 2023.
- 4.2 There were seven responses to the Modifications all which were viewed positively. One was from a member of the public and the remaining ones were specific or statutory consultees. The responses are as follows:

Type of consultee response and organisation	Initials	Consider legally compliant	Consider sound	Comments
Member of public	DB	yes	yes	I support the modifications set out in the Gypsy & Traveller DPD to be included as part of the revised Borough Plan. In particular, I support the revised data in respect of the pitch requirements and the proposals to revise the layout of existing sites and/or locate any expansion of capacity within existing sites or adjacent where practicable.
Specific and statutory consultation body - Coal Authority	ML	Not stated	Not stated	<p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the Nuneaton and Bedworth DPA area, there are coal mining features present at surface and shallow depth including: mine entries, coal workings and reported surface hazards. These recorded features may pose a potential risk to surface stability and public safety.</p> <p>The Coal Authority's records also indicate that</p>

				<p>surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.</p> <p>I have reviewed the Main Modifications proposed and can confirm that the Planning team at the Coal Authority have no specific comments to make on these.</p>
Specific and statutory consultation body - Environment Agency	TJ	Not stated	Not stated	<p>Thank you for consulting the Environment Agency on the above local plan consultation, which we received via email on 4 September 2023.</p> <p>Based on our records we previously provided comments at the formal pre-submission stage of the process, in letter dated 15 March 2022 (letter reference UT/2007/101886/OT-04/SB1-L01).</p> <p>For completeness, we note the following main modification documents have been published for comment:</p> <ul style="list-style-type: none"> - CD 6.2 Schedule of Main Modifications (June 2023) & - CD 6.3 Schedule of Additional Main Modifications (June 2023) <p>In light of the proposed Main (and Additional Main) Modifications and our previous representations, we note our comments have been incorporated into modifications MM13 and Additional Modification M12.</p> <p>As such we have no further comments to make at this stage.</p>
General consultation body - Equality and Human Rights Commission		Not stated	Not stated	<p><u>Case 7975320</u> <u>Subject: Consultation on Site Allocation Document for Gypsies and Travellers</u></p> <p>Thank you for your email dated 4 September 2023. The Commission does not have the resources to respond to all consultations, and will respond to consultations only where it considers they raise issues of strategic importance.</p> <p>While unfortunately we are unable to respond in</p>

				<p>this particular instance, the Commission has engaged in a wide range of work related to Gypsy and Travellers issues and therefore to assist I have referred you to some of the most relevant below.</p> <p><u>Public Sector Equality Duty</u></p> <p>Councils have duties under the Public Sector Equality Duty (PSED) set out in section 149 Equality Act. In the exercise of all its functions, it has a duty to have 'due regard' to three statutory equality needs:</p> <ul style="list-style-type: none"> • to eliminate discrimination and harassment; • to advancing equality of opportunity between members of protected groups and others; and • to foster good relations between persons who share a relevant protected characteristic and persons who do not. <p>We provide advice for public authorities on how to apply the PSED, which is an on-going legal obligation and must be complied with as part of the planning process.</p> <p>The PSED is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people. You can find our technical guidance here.</p> <p><u>Commission research</u></p> <p>Our research has shown that Gypsy and Traveller communities in Britain experience wide-ranging inequalities. Many stereotypes about Gypsy Travellers already exist, and negative attitudes and ingrained prejudices within parts of wider society can be hard to tackle. In addition, racism towards Gypsies and Travellers is still common and seen as justified. The Royal Town Planning Institute Guidance Notes also point out that Gypsies and Travellers are often treated as a group against whom it is acceptable to be prejudiced in the planning process.</p> <p>Please see links below to our research reports on Gypsies and Travellers below: 'Inequalities experienced by Gypsies and Travellers' http://www.equalityhumanrights.com/en/gypsies-</p>
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				and-travellers-simple-solutions-living-together/gypsies-and-travellers-research-reports. 'Simple Solutions for living together' http://www.equalityhumanrights.com/en/gypsies-and-travellers-simple-solutions-living-together .
Specific and statutory consultation body - Historic England	EB	Not stated	Not stated	In relation to Nuneaton & Bedworth Borough Council's Gypsy and Traveller Site Allocations Development Plan Document (DPD) – Main Modifications, I can confirm that Historic England has no comments to make.
Specific and statutory consultation body - National Highways	RG	Not stated	Not stated	<p>National Highways welcomes the opportunity to comment on the Publication Version of the Borough Local Plan which covers the plan period from 2021 to 2039. The document provides a vision for the future of the area and sets out a number of key objectives and planning policies that will be used to help support growth across the region. Alongside this, we also welcome the opportunity to respond to the Main Modifications consultation on the Gypsy and Traveller Site Allocations DPD which sets out to allocate sufficient land to meet the Gypsy, Traveller and Travelling Showpeople needs up to 2037.</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this consultation, National Highways' principal interest is in safeguarding the operation of the M6 and M69 motorways and the A5 trunk road which route through the area.</p> <p><u>Gypsy and Traveller Site Allocations Development Plan Document (DPD) – Main and Additional Modifications</u></p> <p>We note that the Publication Version of the Gypsy and Traveller DPD was consulted upon in early 2022 before it was submitted for Examination to the Secretary of State later that year. As part of the examination process, a series of amendments to the DPD have been agreed with the Inspector to make the DPD both sound and legally compliant (Main</p>

				<p>Modifications) and factually correct (Additional Modifications). The Main and Additional Modifications form the subject of this latest consultation.</p> <p>We note that 'Policy H3 – Gypsies and Travellers' set out within the adopted Borough Plan (2011-2031) will be superseded by the Gypsy and Traveller Site Allocations DPD. The DPD allocates sufficient land to meet the Gypsy, Traveller and Travelling Showpeople needs up to 2037.</p> <p>The following Gypsy and traveller sites are allocated within the amended DPD.</p> <p>1. GTSA1 - Sunrise Cottage for three additional pitches 2. GTSA2 - The Old Nursery for five to six new pitches 3. GTSA3 - Winter Oak for six additional pitches</p> <p>We note that GTSA3 is located in the close vicinity of the A5 which forms part of the SRN in the area. As part of the Publication Version, we recommended that text should be included within Policy GT3 – Site Allocations to outline the need for the applicant to liaise with National Highways prior to the submission of a planning application. We welcome the fact that this has been included as part of the Additional Modifications response and therefore have no further comments to provide.</p> <p><u>Summary</u></p> <p>In relation to the Gypsy and Traveller Site Allocations DPD, we note that our previous comments have been incorporated into the document as part of the Additional Modifications consultation and this is welcomed.</p>
Specific and statutory consultee WCC Flood Risk Management		Not stated	Not stated	<p>Thank you for consulting Warwickshire County Council as Lead Local Flood Authority (LLFA).</p> <p>We have reviewed both the Borough Plan review DPD and G&T Site Allocations DPD. We have no specific comments to raise in relation to these documents.</p>

4.3 These consultation responses were then sent to the Planning Inspector.

5 The Inspectors Report

- 5.1 The Inspectors Final Report concludes that the Nuneaton and Bedworth Gypsy and Traveller Site Allocations Development Plan Document ('DPD') 2021-2037 provides an appropriate basis for addressing the accommodation needs of Gypsies and Travellers in the Borough, provided that a number of Main Modifications are made to it.
- 5.2 There was a caveat to the agenda report in May 2022 that was requesting approval to submit to the Secretary of State which stated that:
 'Delegated Authority be given to the Head of Planning and Building Control in consultation with the Cabinet Member for Planning and Regulations to make any minor modifications to the Document that the Planning Inspector deems necessary to make the plan sound'. Therefore, it is considered that these Modifications can be made. The schedule of Modifications is provided in Appendices C and D.
- 5.3 The Inspectors report includes several requirements that have to be made in order for the Document to be considered appropriate for adoption. He divides the report into areas, a summary of each section is set out below:
- 5.4 *Non-Technical Summary*
 Concluding the DPD is appropriate subject to Modifications (as agreed between the Council and Planning Inspector) and which were subject to consultation. This also provides a precis of the Main Modifications.
- 5.5 *Introduction*
 That the report is the Planning Inspectors assessment of the DPD and other documents submitted as part of the Examination process.
- 5.6 *Main Modifications*
 Confirming the Council requested the Inspector to recommend any Main Modifications and confirming these were open to consultation.
- 5.7 *Policies Map*
 Confirms the Council will need to update the adopted Policies map to include all the changes in the DPD.
- 5.8 *Context of the Plan*
 Confirms that the DPD sets out the Policies and sites proposed and that some Policies in the adopted Borough Plan will be superseded by the DPD.
- 5.9 *Assessment of Duty to Co-Operate*

The methods and communication the Council had with other Local Authorities and statutory consultees. States that the Inspector is satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the DPD and that the duty to co-operate has therefore been met.

5.10 *Public Sector Equality Duty*

The Inspector considers that the Equality Act 2010 has been met including general needs, needs of particular age groups, concealed households, future household formation and for those who have ceased to travel.

5.11 *Assessment of Other Aspects of Legal Compliance*

That the DPD complies with the Council's Local Development Scheme and that consultation was carried out on the DPD and Main Modifications in compliance with the Council's Statement of Community Involvement. That the Council carried out a Sustainability Appraisal and Habitat Regulations Assessment at the relevant stages. That the DPD includes policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change and policies are contained within the adopted Borough Plan. The Report also details where adopted Policies are to be superseded.

5.12 *Assessment of Soundness*

Identifies the main issues upon which the soundness of the DPD depends and that subject to Main Modifications the proposed site allocations are justified and identifies a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against the requirement.

5.13 Within the assessment of soundness 3 issues were considered as follows:

5.14 *Issue 1 – Whether the Council's overall strategy for meeting Gypsy and Traveller and Travelling Showpeople accommodation needs is justified and whether it is consistent with the adopted Borough Plan (2019).*

5.15 This refers to the distribution of sites, the need including hidden households and that whilst the sites requirement could potentially be met on the WCC owned site, the further identified sites provide a robust approach. The issue also discusses the need to supersede some of the Borough Plan Policies and the decision not to remove the sites from the Green Belt. The monitoring arrangement has also been assessed and the Report concludes that subject to the Main Modifications, the Council's overall strategy for meeting G&T accommodation needs is justified and consistent with the adopted Borough Plan.

- 5.16 *Issue 2 – whether the proposed site allocations are justified and whether the DPD identifies a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against the requirement.*
- 5.17 Considers the justifications of the existing underutilised existing sites and the proposed site including the Showperson plots are robust subject to Main Modifications.
- 5.18 The Inspector then assesses the discussions held during the Examination process and he states that:
 “In terms of transit provision, the GTTSAA recommended that the Council make use of negotiated stopping arrangements. In this regard, the Council has already made use of negotiated stopping in the Borough and has developed a standard agreement that both it and the Gypsies and Travellers in question sign in such circumstances. This includes the condition the site will be left in, the services that will be provided to it (refuse collection, portable toilets, etc), and includes a financial bond. The Council intends to roll out this approach going forward. In light of the evidence before me, including that given at the hearing session, I am satisfied that this is a sensible approach to transit provision and that the DPD is therefore sound in the absence of allocating sites for this purpose.”
 The Inspector would not have considered the DPD sound without this requirement.
- 5.19 The Inspector concludes that subject to Main Modifications that issue 2 is considered acceptable and that the DPD identifies a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against the requirement.
- 5.20 *Issue 3 – Whether the proposed criteria-based policy is necessary, justified, effective, and consistent with national policy.*
- 5.21 The Inspector in issue 3 refers to the necessity for having a criteria based policy to provide a basis for planning applications. He agrees the sequential approach taken to proposals is appropriate and concludes that subject to Main Modifications the Policy is acceptable.
- 5.20 *Overall Conclusion and Recommendation.*
 The DPD has a number of deficiencies which means it could not be adopted in its original form but subject to the Modifications, the DPD is capable of adoption; that the duty to cooperate has been met, and therefore complies with Section 20(5)(a) of the 2004 Act and is sound.

6 Conclusion

- 6.1 That the responses to the Main and Additional Modifications are noted. That Cabinet recommend to Council that The Gypsy and Traveller Site Allocations Development Plan Document (DPD) published in January 2022 as amended (Appendix B) by:
- The Inspectors Final Report (Appendix A);
 - The schedule of Main Modifications recommended by the Inspector (Appendix C); and
 - The schedule of Additional Modifications (Appendix D)
- be adopted.
- 6.2 This is with the caveat that any minor typing errors or page numbering errors can be carried out by Delegated Powers of the Assistant Director for Planning in consultation with the Portfolio Holder for Planning and Regulation

7 Appendices

Appendix Reference	Details of Appendix document
A	Planning Inspectors Report considering the document is sound subject to Modifications.
B	Gypsy and Traveller Site Allocations Development Plan Document 2021 - 2037
C	Main Modifications necessary to make the DPD sound
D	Additional Modifications.

8 Background Papers

The published documents for the Gypsy and Traveller Site Allocations Development Plan Document can be viewed at:

[Proposed Gypsy and Traveller Site Allocations Development Plan Document | Proposed Gypsy and Traveller Site Allocations DPD | Nuneaton & Bedworth \(nuneatonandbedworth.gov.uk\)](#)

Report to Nuneaton and Bedworth Borough Council

by Thomas Hatfield BA (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Date 18 December 2023

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Nuneaton and Bedworth Gypsy and Traveller Site Allocations Development Plan Document 2021-2037

The Plan was submitted for examination on 29th June 2022

The examination hearing was held on 27th October 2022

File Ref: PINS/W3710/429/5

Abbreviations used in this report

the Council	Nuneaton and Bedworth Borough Council
DPD	Development Plan Document
GTTSA	Gypsy and Traveller and Travelling Showperson Accommodation Assessment
MM	Main Modification
NPPF	National Planning Policy Framework
PPTS	Planning Policy for Traveller Sites
SAC	Special Area of Conservation

Non-Technical Summary

This report concludes that the Nuneaton and Bedworth Gypsy and Traveller Site Allocations Development Plan Document ('DPD') 2021-2037 provides an appropriate basis for addressing the accommodation needs of Gypsies and Travellers in the Borough, provided that a number of main modifications ('MMs') are made to it. Nuneaton and Bedworth Borough Council ('the Council') has specifically requested that I recommend any MMs necessary to enable the DPD to be adopted.

Following the hearing, the Council prepared schedules of proposed modifications and carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a six-week period. I have recommended their inclusion in the DPD after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to the consultation on them.

The Main Modifications can be summarised as follows:

- Changes to ensure consistency with the adopted Nuneaton and Bedworth Borough Plan 2011-2031 (2019) and to clarify which policies are superseded;
- Amendments to Policy GT2 for effectiveness and to incorporate criteria from Policy H3 of the adopted Borough Plan (which is to be superseded);
- Additional criteria added to some site-specific policies;
- Some re-wording to improve clarity and effectiveness;
- A number of other modifications to ensure that the DPD is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers firstly whether the DPD's preparation has complied with the duty to co-operate. It then considers whether the DPD is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework ('the Framework') (paragraph 35) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. The Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD, submitted in June 2022 is the basis for my examination. It is the same document as was published for consultation in January 2022.

Main Modifications

3. In accordance with Section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications ('MMs') necessary to rectify matters that make the DPD unsound and/or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearing, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the changes to the policies map comprise the inset plans beneath policies GT3 and GT4 of the DPD.
6. When the DPD is adopted, in order to comply with the legislation and give effect to its policies, the Council will need to update the adopted policies map to include all the changes proposed in the DPD.

Context of the Plan

7. The Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD sets out policies relating to Gypsy and Traveller and Travelling Showpeople proposals, and also allocates sites for these purposes. It is intended to supersede Policy H3, and the third bullet point of Policy DS4, of the adopted Borough Plan. A DPD of this nature is also envisaged in Policy H3 of the Borough Plan.

Assessment of Duty to Co-operate

8. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council has complied with any duty imposed on it by Section 33A in respect of the DPD's preparation.
9. The DPD focuses on meeting the Borough's own needs and does not rely on neighbouring authorities to assist. Moreover, the Council has not been asked to help meet the needs of any neighbouring local planning authority. In this regard, the DPD is based on a strategy that seeks to meet the needs of the Borough only, which is consistent with the approach taken to Gypsy and Traveller and Travelling Showpeople sites in the adopted Borough Plan.
10. Prior to updating the 2016 Gypsy, Traveller, and Travelling Showperson Accommodation Assessment ('GTTSA'), the Council contacted all adjoining planning authorities to see if there was any interest in jointly commissioning this study. However, no such interest transpired and an update covering just Nuneaton and Bedworth was therefore commissioned. The subsequent 2021 GTTSAA update was informed by feedback and input from neighbouring planning authorities as is set out at paragraphs 5.22-5.26 of that document.
11. In preparing the DPD, the Council consulted and actively engaged with neighbouring planning authorities as well as with Warwickshire County Council, who have responsibility for education, highways, transport planning, waste disposal, etc. The County Council also own and manage a Gypsy and Traveller site in the Borough.
12. No local planning authority or other prescribed body claim that the Council has failed to comply with the Duty. The Council has prepared a Duty to Cooperate Statement, and based on what is set out in this document, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the DPD and that the duty to co-operate has therefore been met.

Public Sector Equality Duty

13. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination, including the allocation of Gypsy and Traveller and Travelling Showpeople sites to meet identified need. The DPD also addresses the need of particular age groups within the travelling community by taking account of issues such as concealed households and future household formation. In addition, the DPD makes an allowance in its requirement for new pitches for those who have ceased to travel due to educational or health needs, or age.

Assessment of Other Aspects of Legal Compliance

14. The DPD has been prepared in accordance with the Council's Local Development Scheme. Consultation on the DPD and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
15. The Council carried out a sustainability appraisal of the DPD, prepared a report of the findings of the appraisal, and published the report along with the DPD and other submission documents under Regulation 19. The appraisal was updated to assess the main modifications.
16. The Habitats Regulations Assessment Report (December 2021) sets out why an Appropriate Assessment is not necessary. In this regard, it finds that there is a general absence of impact pathways and there are significant distances from the proposed allocations to designated sites. Accordingly, no likely significant effects will result on either Ensor's Pool SAC or the River Mease SAC as a result of the DPD. Such a conclusion was also supported by Natural England. The Habitat Regulations Assessment of the MMs also concluded that they will not lead to likely significant effects on these SACs, either alone or in combination with other plans and projects.
17. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area. It also includes policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change. Those policies are contained within the adopted Borough Plan.
18. Regulation 8(5) of The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that where it is intended to supersede another policy in the adopted development plan, this fact must be stated and the superseded policy identified. **MM1, MM3, MM5, MM7, MM9, MM10, MM11, MM16, and MM17** ensure that the DPD complies with this requirement.

Assessment of Soundness

Main Issues

19. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearing, I have identified a number of main issues upon which the soundness of the DPD depends. This report deals with these main issues. It does not respond to every point or issue raised by representors, nor does it refer to every policy criterion in the DPD.

Issue 1 – Whether the Council’s overall strategy for meeting Gypsy and Traveller and Travelling Showpeople accommodation needs is justified and whether it is consistent with the adopted Borough Plan (2019).

20. The Strategy set out in the DPD is to fully meet the need for Gypsy and Traveller and Travelling Showpeople sites in the Borough. This is consistent with national planning policy and is a sound approach. In terms of the spatial distribution of sites within the Borough, 2 of the proposed Gypsy and Traveller allocations are intensifications of existing sites, and the third is close to an existing site. These are distributed across the Borough and are generally in more rural locations. The Gypsy and Traveller Site Assessment (2021) indicates that only 1 of these sites was put forward specifically to accommodate family members, and these sites would therefore be capable of meeting the identified need, which will largely arise from household growth and in-migration. No other potential sites were identified through either the Call for Sites, the GTTSAA process, or a review of Council owned sites. In these circumstances, I consider this approach to be sound.
21. The DPD proposes a requirement for the provision of 11 Gypsy and Traveller pitches over the plan period to 2037. This is based on meeting the overall ‘cultural need’ for pitches identified in the updated GTTSAA (2021), which includes need arising from those within the Travelling community who do not meet the Planning Policy for Traveller Sites (‘PPTS’) definition of “gypsies and travellers”. In my view, this assessment is based on robust assumptions, including with regard to migration and need arising from those currently living in bricks and mortar housing. Whilst the GTTSAA states that turnover on an existing Council owned site could meet the identified shortfall in its entirety, there is no guarantee that these pitches will become available at the rate envisaged. Accordingly, the allocation of sites is necessary to ensure that need is met, and the requirement figure in Strategic Policy GT1 is therefore sound.
22. The DPD is intended to sit alongside the adopted Borough Plan and complement it regarding Gypsy and Traveller and Travelling Showpeople site allocations and policy. The submitted DPD proposed a hybrid approach to this whereby DPD Policy GT1 would effectively supersede parts of Borough Plan

Policies H3 and DS4, and DPD Policy GT2 would effectively add criteria to Borough Plan Policy H3. This approach would be confusing and unclear, and modifications are therefore necessary for effectiveness. This is addressed by **MM1, MM3, MM5, MM7, MM9, MM10, MM11, MM16, and MM17**, which ensure that the policies in the DPD will entirely supersede Policy H3 and the third bullet point of Policy DS4 in the adopted Borough Plan.

23. The submitted DPD proposes 2 site allocations that are currently within the Green Belt. In this regard, Policy DS7 of the adopted Borough Plan states that the remaining Green Belt will be protected by restricting development to only that which is considered by national planning policy to be not inappropriate development. It would therefore be inconsistent with the adopted Borough Plan to remove the proposed allocations in the DPD from the Green Belt at this stage. However, the Borough Plan is currently being reviewed, and this matter is therefore capable of being addressed as part of that review. As submitted, the DPD is unclear whether these allocations are proposed to be removed from the Green Belt, and this is remedied by **MM4, MM10, and MM12** which clarify that the allocations remain in the Green Belt. Subject to the MMs identified above, the DPD would be consistent with the adopted Borough Plan except where a DPD policy is intended to supersede an existing policy.
24. In terms of the monitoring arrangements, a number of detailed changes are also necessary for clarity and effectiveness, as is set out in **MM2 and MM15**.
25. Subject to the abovementioned MMs, the Council's overall strategy for meeting G&T accommodation needs is justified and consistent with the adopted Borough Plan.

Issue 2 – whether the proposed site allocations are justified and whether the DPD identifies a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against the requirement.

26. DPD Policy GT3 identifies 3 proposed site allocations for Gypsy and Traveller pitches. Sites GTSA1 and GTSA3 are intensification opportunities to existing consented sites that were identified in the GTTSAA. Both are currently under-utilised and are capable of accommodating additional pitches within the existing site boundary. The availability, capacity, and intension of the landowner to pursue intensification, were established through the GTTSAA, and I consider these assumptions to be robust.
27. With regard to site GTSA2, this is a mostly open site that does not currently contain any Gypsy and Traveller pitches. It is located on the B4109 and relates well to the existing pattern of development along the road. It is not subject to any other over-riding constraint. The site was put forward as a potential

allocation through the GTTSAA and its availability and capacity have been agreed with the landowner.

28. I consider each of the 3 site allocations identified under Policy GT3 to be suitable locations for Gypsy and Traveller pitches. Notwithstanding this, additional policy criteria for each of the allocated sites are necessary for effectiveness and to address soundness issues. These criteria relate to drainage, contamination, children's play provision, air quality and noise, which are addressed in **MM13**. Given the evidence regarding availability and landowner intentions to develop these sites, I also consider them to be deliverable. In addition, a windfall site for 3 additional pitches was approved in June 2022, and taken together, these sites will provide a 5-year supply on adoption of the DPD.
29. Separately, Policy GT4 safeguards the existing Travelling Showpeople site at Spinney Lane/Whittleford Road, Nuneaton for use by Travelling Showpeople. This is consistent with the recommendations of the GTTSAA and is a sound approach. However, several detailed changes to the policy wording are necessary for effectiveness, which is addressed in **MM14**.
30. In terms of transit provision, the GTTSAA recommended that the Council make use of negotiated stopping arrangements. In this regard, the Council has already made use of negotiated stopping in the Borough and has developed a standard agreement that both it and the Gypsies and Travellers in question sign in such circumstances. This includes the condition the site will be left in, the services that will be provided to it (refuse collection, portable toilets, etc), and includes a financial bond. The Council intends to roll out this approach going forward. In light of the evidence before me, including that given at the hearing session, I am satisfied that this is a sensible approach to transit provision and that the DPD is therefore sound in the absence of allocating sites for this purpose.
31. Subject to the abovementioned MMs, the proposed site allocations are justified and I consider that the DPD identifies a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against the requirement.

Issue 3 – Whether the proposed criteria-based policy is necessary, justified, effective, and consistent with national policy.

32. A criteria-based policy is necessary to ensure that the DPD is positively prepared, flexible, and to provide a basis for determining planning applications on Gypsy and Traveller sites not allocated in the DPD. In this regard, submitted Policy GT2 set out additional criteria that would have effectively supplemented adopted Policy H3 of the Borough Plan. For the reasons set out above, Policy GT2 should entirely supersede adopted Policy H3. Modifications are therefore

necessary to incorporate most of the criteria from adopted Policy H3 into Policy GT2, which is addressed in **MM10**.

33. As submitted, Policy GT2 sought to direct windfall Gypsy and Traveller pitches firstly to intensification opportunities on existing sites, then to extensions to existing sites, followed by sites within 1.6 km of services and facilities. However, it is not clear how this approach would have worked in practice, including how it could be demonstrated that expansion opportunities had been exhausted. Such an approach would also have excluded sites within the urban area from consideration until intensification and expansion opportunities had been ruled out. Moreover, it contained no reference to the proposed site allocations. Accordingly, further modifications in **MM6**, **MM8**, and **MM10** are necessary for effectiveness and to highlight those site types where new pitches / plots will be permitted, subject to compliance with other local and national policies.
34. Subject to the abovementioned MMs, I consider that the proposed criteria-based policy is necessary, justified, effective, and consistent with national policy.

Overall Conclusion and Recommendation

35. The DPD has a number of deficiencies in respect of soundness, for the reasons set out above, which mean that I recommend non-adoption of it as submitted in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
36. The Council has requested that I recommend MMs to make the DPD sound and capable of adoption. I conclude that the duty to cooperate has been met, and that with the recommended main modifications set out in the Appendix, the Gypsy and Traveller Site Allocations Development Plan Document satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

Thomas Hatfield

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.

Gypsy and Traveller Site Allocations DPD

2021 - 2037



Nuneaton and Bedworth Borough Council

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1.0 Introduction

- 1.1 Nuneaton and Bedworth Borough Council adopted a Borough Plan on 11th June 2019 which planned for new development in the borough until 2031. The Borough Plan plans, principally, for new commercial, employment, and residential uses. In terms of residential uses the Borough Plan must plan for all parts of the community and thus deals with provision for Gypsies and other Travellers.
- 1.2 Policies DS4 – Overall development needs and H3 – Gypsies and Travellers set out the need for new pitches by 2031/2032 to be at least 39 residential and 5 transit pitches. Policy H3 does not set out where the new pitches would be provided but sets out the criteria that will be used to identify potential locations for residential and permanent pitches through the Gypsy and Traveller Site Allocations Development Plan Document (DPD). It is through this DPD that land is identified and allocated for future traveller sites. Policy H3 of the current adopted Borough Plan (2011-2031) is superseded entirely by the DPD and in the emerging Borough Plan Policy H3 will purely refer to the DPD for Policies relating to **Gypsy, Travellers and Showperson pitches and plots**.
- 1.3 The current Local Development Scheme (2020) sets out the timetable for the production of Gypsy and Traveller Site Allocations DPD which is as follows:
- May 2021 – consultation on an Issues and Options document;
 - January 2022 – consultation on a publication document;
 - July 2022 – submission of the document to the Secretary of State;
 - January 2023 – receipt of Inspector's report on the examination of the document; and
 - February 2023 – adoption of the document.
- 1.4 This adopted DPD was preceded by the Publication version of the Gypsy and Traveller Site Allocations DPD; which was the formal document required by Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. This was consulted on between 28th January 2022 and 25th March 2022. A consultation on the previous version of the Gypsy and Traveller Site Allocations DPD, the Issues and Options consultation draft, took place between 11th June 2021 and 6th August 2021. This document was that required by Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. A consultation statement has been produced which sets out the responses received and how they were considered in producing the DPD.

- 1.5 The document is set out in four subsequent chapters addressing the vision and objectives of the DPD, followed by the need for new pitches, the locations of these new pitches and a monitoring schedule for the DPD.
- 1.6 To support this document the Council has commissioned a consultant to produce a new Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA) and this can be viewed alongside this document. The most recent study prior to this new GTAA dates from 2016 and it concluded that the evidence base is refreshed on a five-yearly basis to ensure that the level of pitch and pitch provision remains appropriate. The DPD is also supported by a 'Site Assessments and the Green Belt' document, a Sustainability Appraisal Report, and an Appropriate Assessment, the contents of which have been considered in the production of this DPD. All supporting documents can be seen on the Borough Council's website alongside this DPD as part of the formal consultation.

2.0 Vision & Objectives

Vision

- 2.1 The vision was contained within the Issues and Options consultation draft of the DPD. Since that document the vision has been amended so that reference to the environment is made thereby linking the vision more to objective 3.
- 2.2 The vision for this DPD is for the needs of the travelling community in and visiting the borough to be provided with sufficient pitches so that they can live, work, and rest in the borough. Pitches will be well located and integrated into the environment and the local community thereby providing good access to essential services.

Objectives

- 2.3 The following objectives will help achieve the vision for the DPD. Three objectives were consulted upon and although no issues were raised by consultation responses on the content of the objectives, objective 3 has been amended. The intent of the objective remains the same, but the terminology has been changed so that it aligns better with the language used in the adopted Borough Plan.

Objective 1 - to provide sufficient pitches for the needs of the travelling community.

Objective 2 - to provide provision in sustainable locations with good access to local services.

Objective 3 - to provide provision in such a way that the local environment is protected and, where appropriate, enhanced.

These objectives are interrelated and in combination they will contribute to realising the vision for the DPD.

3.0 Need

Introduction

- 3.1 The evidence base that supported the formation of the need for new pitches in the Borough Plan was the 2016 Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA). Since the 2016 GTAA was produced the 2016 Housing and Planning Act introduced the need to conduct a wider assessment of all caravan and houseboat accommodation needs, not just those from Gypsy and Traveller ethnicities. A new assessment of accommodation needs has been produced, dated from 2021. This assessment updates the need for new pitches to those published in the Borough Plan and addresses the implications of the 2016 Housing and Planning Act.
- 3.2 The Issues and Options consultation proposed four options for the number of pitches to provide ranging from that in the 2021 GTAA through to figures above those in the GTAA from 2016 (and published in the Borough Plan). After careful consideration it is considered that the figures from the 2021 GTAA should be used as the basis for the need. Even though representations on the DPD were low, the newer figures were clearly preferred over those that were now nearly six years old by respondents. Not only are these figures more recent, but the interview rate was also much higher giving greater confidence that the assessment of need is more robust and closer to that actually required. These four options were assessed in the accompanying sustainability appraisal to the issues and options document and these four options all came out the same, partly because all reasonable options considered would achieve the number of pitches set in the 2021 GTAA as a minimum (which is the most recent data source) but also because there were many unknowns of the likely impacts that would result from these different sets of figures for new pitch numbers.
- 3.3 Using the requirement for new pitches from the 2021 GTAA as a minimum rather than the higher figures in the extant Borough Plan means that this document will need to supersede the requirements for new pitches set out in Policies DS4 and H3 of the Borough Plan.

Gypsies and Travellers

- 3.4 The first part of the 2021 GTAA was to assess the current occupancy of pitches within the borough, then to assess how much capacity remains above this, so, how many pitches are unoccupied but are available, followed by calculating how many more pitches are needed to fulfil the need for new pitches within the borough. The new GTAA advises that with the current

occupied and vacant pitches within the borough there is a need for 16 additional residential and no transit pitches to meet the needs of those who meet the definition of travellers as set out in the Planning Policy for Traveller Sites, August 2015; this increases by four to a total of 20 additional residential pitches to meet a cultural need (that is, people who do not meet the definition of a traveller but nevertheless live on pitches). For travellers, this is change of 23 residential pitches and 5 transit pitches from those figures published in the Borough Plan (both decreasing). Table 1 below repeats the figures from Table 6.3 of the 2021 GTAA in which the need for new pitches is set out.

Table 1 - Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37.

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Longer-term need		
<i>Over period 2026/7 to 2030/31 (B)</i>	4	3
<i>Over period 2031/32 to 2036/37(C)</i>	8	7
<i>Longer-term need TOTAL to 2036/37 (12 years) D=(B+C)</i>	12	10
NET SHORTFALL 2021/22 to 2036/37 (A+D) (11 years)	20	16

PPTS = Planning Policy for Traveller Sites (2015) within which the definition of Gypsies and Travellers is provided.

- 3.5 The 2021 GTAA assumes that some of this provision for additional pitches can be found through turnover on the site at The Griff and by a combination of intensification and expansion of three existing sites to provide 11 pitches. Table 2 below repeats the figures from Table 6.4 of the 2021 GTAA which sets out these assumptions. Thus, the table shows that through the provision of 11 new additional pitches the need up to 2036/37 is met and, therefore, this meets the need evidenced in the 2021 GTAA.

Table 2 - Addressing Gypsy and Traveller pitch need.

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6

Anticipated minimum turnover on council site (B)	7	7
Potential intensification/expansion of existing sites (C)	6	6
Residual need 2021/22 to 2025/26 after turnover and potential intensification/expansion (D) = A-B-C	-5 Need met	-7 Need met
Longer-term need 2026/27 to 2036/37 (E)	12	10
Anticipated minimum turnover on council site (F)	15	15
Potential intensification/expansion of existing sites (G)	5	5
Residual need 2025/26 to 2036/37 after turnover (H) = E-F-G	-8 Need met	-10 Need met
Residual need 2021/22 to 2036/37 after turnover and potential pitch development considered (I) = D+H	-13 Need Met	-17 Need met
Summary	Cultural need	Of which: PPTS NEED
Plan period Authorised Pitch Shortfall (2021/22 to 2036/37) (J = A+E)	20	16
Anticipated minimum turnover on council site (K) = B+F	22	22
Potential intensification/expansion of existing sites (L)=C+G	11	11
Residual need 2021/22 to 2036/37 after turnover (M=J-K-L)	-13 Need met	-17 Need met

- 3.6 Although turnover has been considered and has the potential to meet need based on past trends, this cannot be wholly relied upon as the future level of turnover at The Griff is not guaranteed. Instead, turnover is one element of supply but there remains a need to take positive steps to increase the number of pitches available to households across the borough to meet the needs identified and to plan positively for the area. This is particularly important for the Council to achieve a 5-year land supply of new pitches. So, turnover can be relied upon to meet some of the forecast need but not to the exclusion of allocating new pitches. The GTAA of 2021 identified 11 pitches that could be found in the Borough and this should be used to form

the basis of the minimum new pitches to provide, the remainder will be met by turnover.

Travelling Showpeople

- 3.7 The GTAA from 2021 states that there is 1 occupied and 3 vacant pitches in the Borough for use by Travelling Showpeople. The 2016 GTAA set out that there were 4 private owned pitches, and plots on site/yards of which 4 were occupied and 0 were vacant. Therefore, plot numbers have remained the same but vacant plot numbers have increased. No additional provision is recommended by the current GTAA.

Bargee Travellers

- 3.8 In the 2016 GTAA bargee Travellers were accounted for by one family present in the borough. No change to bargee Traveller numbers are contained within the updated GTAA.

Future Need

- 3.9 In the 2021 GTAA it is recommended that the *"...evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth."* This is an important element of confirming that the need in this DPD remains as required. It is therefore the Council's intention that the number of new pitches will be assessed each year at the Authority Monitoring Report (AMR) stage and landowners contacted to encourage the sites to come forwards. The DPD will be reviewed five years after adoption and subsequently five years thereafter on an ongoing basis, to ensure the document meets the current needs. The update of the GTAA is referenced in Table 3 of Chapter 5.0 on Monitoring of this document. Should need be found to have changed beyond that set out in this DPD (or indeed for another reason such as undeliverability of a site or sites) then this should trigger a review of this DPD.

Strategic Policy GT1 – Overall Need

The following levels of development will be planned for and provided within Nuneaton and Bedworth Borough between 2021 and 2037:

- At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025 and
- At least a further 5 permanent residential pitches beyond those required by 2025 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2037.

This Policy supersedes the third bullet point of DS4 of the adopted Borough Plan (2011-31).

4.0 Location of Pitches

Green Belt

- 4.1 Two of the sites to receive new pitches are within the Green Belt, namely Sunrise Cottage and The Old Nursery. Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt and Green Belt forms a large part of the borough. The Green Belt is mostly located to the south of Nuneaton, but also surrounds the main areas of Bedworth, Bulkington, and Ash Green. Nationally, the government attaches great importance to the Green Belt. The five key purposes of Green Belts are:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.2 Alterations to the Green Belt boundary are only approved in exceptional circumstances and must be done during the local plan making process. In reviewing land to be released from the Green Belt for development, the exceptional circumstances should be weighed up against any potential adverse effects on the overall integrity of the Green Belt, according to an assessment of the whole of the Green Belt based around the five purposes set out above. Traveller sites are inappropriate development in the Green Belt. Furthermore, subject to the best interests of the child, personal circumstances, and unmet need Traveller sites in the Green Belt are unlikely to clearly outweigh harm to the Green Belt.
- 4.3 Sunrise Cottage and The Old Nursery are not currently being considered for the removal of their Green Belt status. The removal of the two sites from the Green Belt would not be consistent with Policy DS7 of the current Borough Plan (and would be noncompliant with Regulation 8(4) of the 2012 Regulations) which is the Part 1 plan. Notwithstanding this, the Borough Plan is currently being reviewed and the Green Belt status of these two sites may be revisited, if necessary, when the Borough Plan is updated as part of a wider review of the Green Belt. However, the Site Assessments and the Green Belt document explains how the Green Belt sites may be considered suitable for development subject to meeting national policy for the Green Belt.
- 4.4 If future planning applications on these sites are considered to be inappropriate development in the Green Belt, then it would be necessary to demonstrate 'very special circumstances' in accordance with the

Framework. In this regard, the allocation of these sites for new Gypsy and Traveller pitches in this DPD will be an important consideration in any such assessment.

Sustainability

- 4.5 Beyond the issue of the Green Belt, which is a significant matter, there are other factors that may need consideration for the locating of new Gypsy and Traveller pitches. Sites should have reasonable access to services, such as shops, schools, GP surgeries, and pharmacies, and this access should be capable of being done by modes of transport other than private car. Walking is the easiest and cheapest way to access services and thus is the focus for accessibility. However, many of the current sites are limited by their options for modes of travel.
- 4.6 Sites should also avoid locations that would impact upon land that has been designated for its interest, so, sites of ecological, heritage, or geological value. Similarly, contaminated land, land prone to flooding, and land in a sensitive landscape should also be avoided. These and other criteria for selecting new Gypsy and Traveller sites are set out in Policy GT2 – Strategy.

Locational Strategy

- 4.7 The fundamental purpose of the Gypsy and Traveller Site Allocations DPD is to allocate land to provide for the number of pitches identified for the required need to 2037. The Issues and Options consultation draft proposed four strategies for allocating new pitches. These were all assessed within the accompanying sustainability appraisal and two of the options were found to be the most sustainable, namely the following:
 - A. Seek to allocate new pitches firstly within the permitted area of existing sites and/or adjacent to these sites, then based on walking distances to services, and then by existing Policy H3.
 - D. Seek to allocate new pitches firstly within the permitted site area of existing sites, then adjacent to these existing pitches, then based on the criteria set out in the latter part of the policy.
- 4.8 Respondents to the issues and options selected only options A and D – with an even split of numbers to these two options from respondents. Options A and D – the first difference is that option A uses extant Policy H3 to assess sites at the outset whilst option D only uses extant Policy H3 once insufficient sites have been found via other means. The second difference is that option D separates out the permitted areas of existing sites from land adjacent to existing sites whereas option A does not and treats them together. It is considered that option D should form the basis of the

allocation of new pitches as it allows for the consideration of the permitted site area of existing sites first (and in isolation) and this has the potential for the least impact. However, in hindsight, the use of the word 'adjacent' could give rise to some ambiguity and the word 'adjoining' will be used instead to emphasise that there should be a physical relationship between the new and the existing. It should be noted that should planning applications be made for new pitches on unallocated sites then the strategic policy in this DPD would be used as the starting point to assess their suitability.

- 4.9 Policy GT2 identifies that new Gypsy and Traveller pitches will generally be supported within the sites allocated within GT3 or within the permitted area of existing lawful, authorised Gypsy and Traveller sites. In addition, to ensure that consideration is given to sustainability, any new sites that come forwards within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan). In addition, land adjoining the permitted area of existing lawful, authorised Gypsy and Traveller sites will be considered as long as these are in proportion appropriate to the scale of the existing site. The intention is to supersede entirely Policy H3 in the current adopted Plan (2011 – 2031). Within the emerging Borough Plan (2024 – 2039) emerging Policy H3 will simply signpost to the adopted DPD for guidance on any new pitches or plots.

Strategic Policy GT2 – Strategy

Planning permission will be granted for new Gypsy and Traveller pitches subject to compliance with other policies of the development plan and with national policy, including in relation to Green Belt, on the following land:

- a) Sites allocated in Policy GT3 or within the permitted area of existing lawful, authorised Gypsy and Traveller sites;
- b) Sites within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan);
- c) Extensions adjoining the permitted area of existing lawful, authorised Gypsy and Traveller sites that are proportionate in scale to the existing site.

Any proposed sites considered must comply with all of the following:

- a) The site should have reasonable access to essential services including health and education facilities and access to local shops;
- b) The number of pitches or plots is in proportion to the size and scale of the site;
- c) The number of pitches or plots is in proportion to the size and density of the nearest settled community;
- d) The site is not located in areas of high flood risk;

- e) The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets;
- f) The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected;
- g) The site has suitable access to the highway network;
- h) The site is located where air or noise pollution will not significantly affect the health and well-being of site residents; and
- i) The site has suitable connection to the foul sewage system or can demonstrate that connection is unviable and alternative arrangements can be made.

This Policy supersedes Policy H3 of the adopted Borough Plan (2011-31).

- 4.10 Where alternative methods for foul water treatment such as septic tanks or cesspits are required; consent will be required from the Environment Agency for an Environmental Permit (Regulations 2016). This is to enable the discharge of polluting substances (including sewage effluent) into surface waters or the ground. It is the Applicants responsibility to make the appropriate enquiries regarding any Environmental Permit requirements. (Environmental Permitting Guidance can be found at: <https://www.gov.uk/environmental-permit-check-if-you-need-one>)

Allocation of Sites

- 4.11 Using the strategy above as the basis for allocating new pitches, the starting point is within existing sites. The 2021 GTAA identified two privately owned sites within the Borough which had the potential to accommodate new additional pitches within their existing approved extent. These are Winter Oak, Watling Street, Nuneaton and Sunrise Cottage, Mile Tree Lane, Bulkington. The GTAA indicated that these could accommodate up to 11 additional pitches. These have been independently assessed and it was concluded that they could accommodate 9 additional pitches without detriment to the existing occupiers. The sites have also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in these locations (this can be viewed in the 'Site Assessments and the Green Belt' document).
- 4.12 The 2021 GTAA also identified another site that had the potential to accommodate new pitches through the physical expansion of the site. This was the privately owned site at Fella's Acre, Mile Tree Lane, Bulkington which it was considered could accommodate an additional two pitches. This was also independently assessed and following this the site was deemed to be unsuitable for expansion – mainly relating to deliverability. However, the

landowner expressed an interest in developing another site for new pitches, namely The Old Nursery, Parrotts Grove, Coventry. This has been independently assessed and it was concluded that the site could be developed to provide five to six new pitches. The site has also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in this location.

- 4.13 The number of pitches provided by the three sites found acceptable for allocation would provide 14-15 pitches which would, firstly, meet the minimum 11 pitches required and, secondly, build in some resilience should the anticipated levels of turnover at The Griff not take place.
- 4.14 To support the production of this document the Council ran a call for sites between 17th September 2021 and 22nd October 2021 which included Gypsy and Traveller sites. No sites were put forward for this type of use as a result of this call for sites. Therefore, the three assessed independently for the Council remain the only sites for consideration.
- 4.15 Further to the independent assessment and the Council's 'Site Assessments and the Green Belt' document the sites (and the policies) were assessed in the Sustainability Appraisal Report and the Habitats Regulations Assessment. This latter document is a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The Habitats Regulations Assessment concludes that due to the location of the allocated sites and the general absence of realistic linking impact pathways that there would be no likely significant effects on either Ensor's Pool Special Area of Conservation (SAC) or the River Mease SAC either alone or in combination.
- 4.16 The need for new Gypsy and Traveller pitches set out in Strategic Policy GT1 – Overall Need is for at least 11 permanent residential pitches to accommodate Gypsies and Travellers. The sites that have been found acceptable to allocate would provide up to 15 pitches at three locations and these are set out in Policy GT3 – Site Allocations. Below the policy an accompanying plan is provided showing the area to which the allocation relates.
- 4.17 As a result of the assessments of the sites a number of matters are considered important for any subsequent planning application to address, and these have been set out as key development requirements in the relevant policy. The basis of these principles are the responses received

during the informal consultation with key technical stakeholders on the three sites (the details of which can be viewed in the supporting 'Site Assessments and the Green Belt' document) and analysis of the site's context.

- 4.18 It is considered that to make additional use of the accesses at The Old Nursery and Sunrise Cottage sites some key development principles are required to ensure the use of the access is safe. Related to this is a requirement to ensure any new layout encompasses suitable bin storage to ensure these do not end up being stored outside the site. The sites have been assessed against the Wildlife Assessment Check tool as advised by the Open Spaces and Green Infrastructure SPD and in all cases a Preliminary Ecological Assessment is required to ascertain if further ecological survey work is required. The sites of Winter Oak and The Old Nursery both have boundary hedgerows and these help in reducing the site's impact on the local landscape and, thus, any development of the site should not result in these being affected.
- 4.19 The 'Designing Gypsy and Traveller sites: good practice guide' of 2008, although withdrawn on 1st September 2015 and replaced by the 'Planning policy for Traveller sites' document remains a useful guide setting out broad principles to consider in Traveller and Gypsy sites. With regard to communal recreation areas for children the good practice guide set out that it is considered that such areas should be provided where suitable provision is not available within walking distance on a safe route or using easily accessible public transport.
- 4.20 The independent assessment of the sites highlighted that the site at Sunrise Cottage already had provision of a small play area within the site. The Winter Oak site does not but on the other side of the A5 land is being developed for residential uses (reference 034076) which includes a play area, and this would be accessible nearby and thus provision within the site is not considered essential. However, the new site at The Old Nursery has no obvious communal play area in proximity to it and, thus, should be provided within the site – the independent assessment set out that there was sufficient space to accommodate it.
- 4.21 The matter of flooding is not addressed because at this time it is not considered to be relevant as sites are in flood zone 1 and there is no indication that they suffer inundation. However, climate change means that this could change and should this be the case then extant Policy NE4 – Managing flood risk and water quality (Borough Plan) would be used.
-

Policy GT3 – Site Allocations

Planning permission will be granted for new Gypsy and Traveller pitches at the following sites and as denoted with a solid red line on the accompanying site plans:

GTSA1 – Sunrise Cottage for three additional pitches within the existing site as shown as a solid red line on the accompanying plan.

GTSA2 – The Old Nursery for five to six new pitches within the site as shown as a solid red line on the accompanying plan.

GTSA3 - Winter Oak for six additional pitches within the existing site as shown as a solid red line on the accompanying plan.

Key Development Requirements

Planning applications at the allocated sites shall contain the details as set out below:

GTSA1 – Sunrise Cottage

- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.

GTSA2 – The Old Nursery

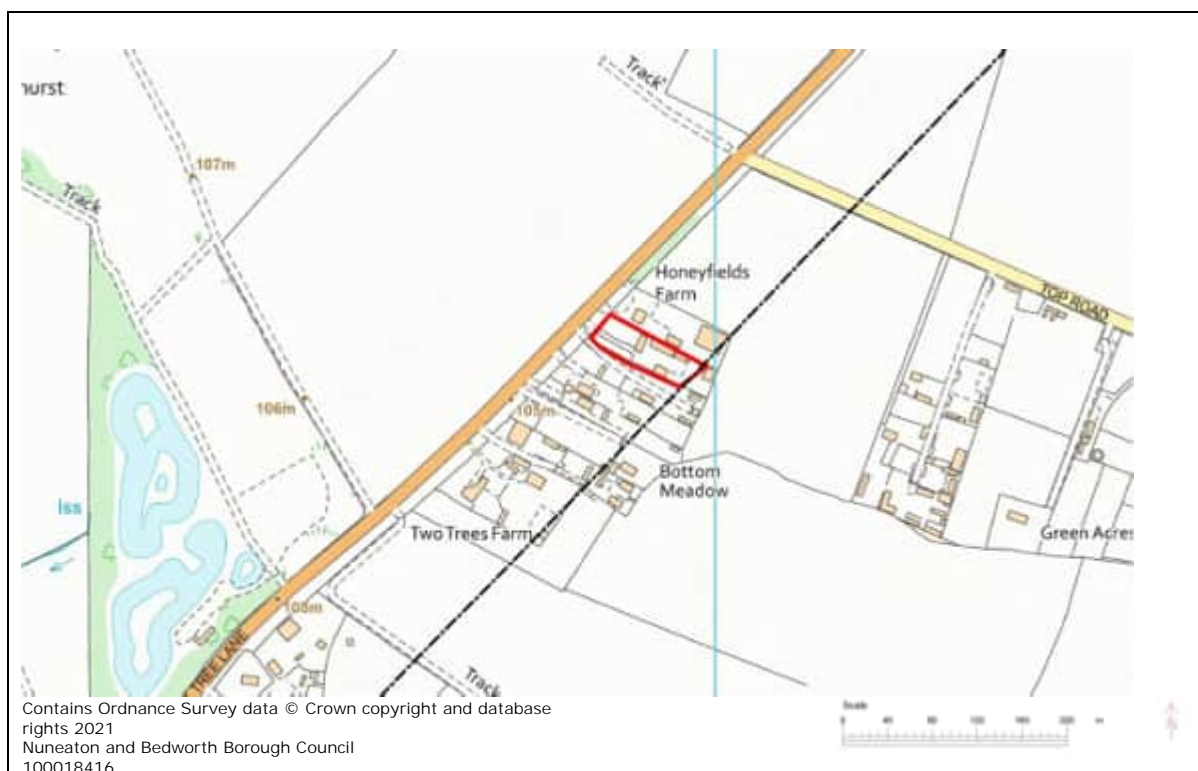
- Closure of the northern access within the site.
- Access to be made in and out of the site from the southern access within the site.
- Configuration of an access that allows for sufficient manoeuvring room for any vehicles entering/exiting the site.
- Any gates within the access to be setback sufficient distance to allow any vehicle entering the site to exit the highway completely whilst the gates are opened or closed.
- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Landscaping of the site boundary to soften the appearance of the pitches from external views.

- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.
- Provision of communal play area within the site.
- Address any contamination on the site.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.

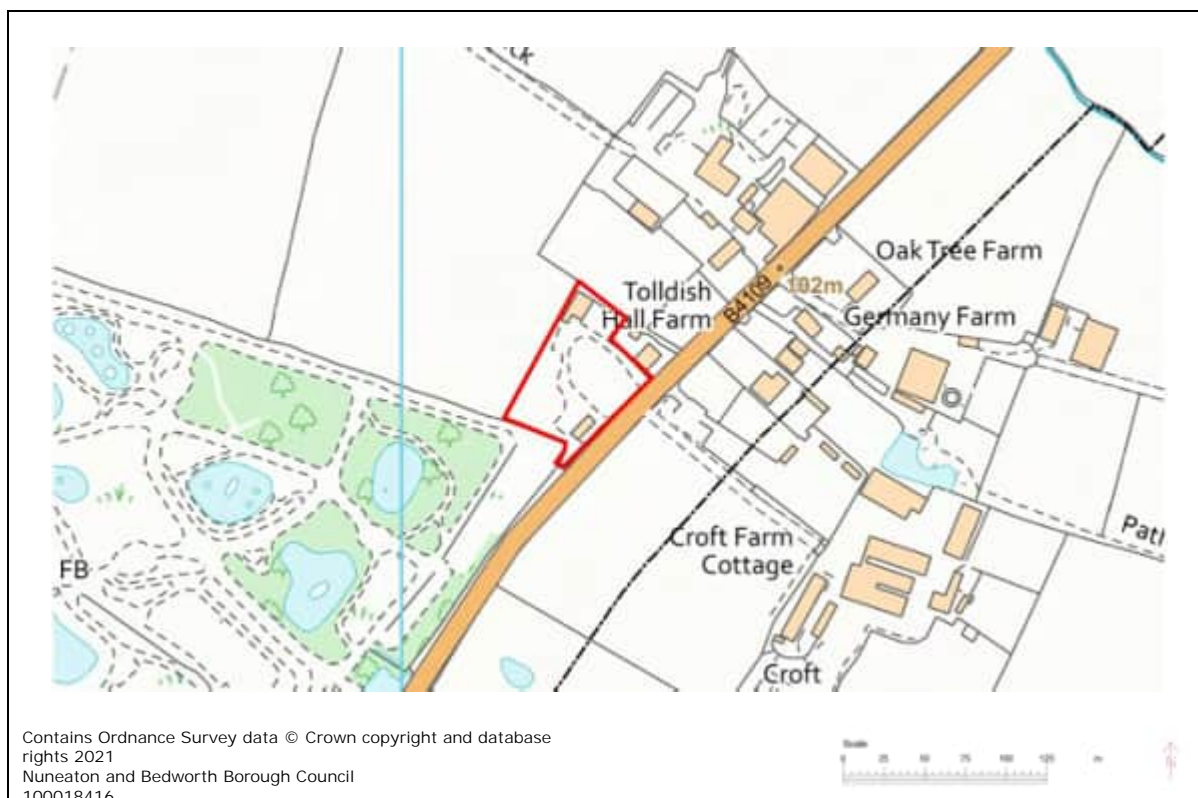
GTSA3 – Winter Oak

- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.
- Provision of communal play area within the site.
- Ensure air and noise quality to future residents of the site is acceptable.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water quality will need to be considered.

GTSA1 – Sunrise Cottage



GTSA2 – The Old Nursery



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Policy GT4 – Site Safeguarding

The Travelling Showpeople site at Spinney Lane/Whittleford Road, Nuneaton as denoted on plan GTSA4 with a solid red line will be safeguarded for use by Travelling Showpeople.

Alternative uses will only be permitted if it is clearly demonstrated that the site is no longer required for Travelling Showpeople accommodation.

GTSA4 – Spinney Lane/Whittleford Road, Nuneaton



- 4.23 As well as the allocation of sites for new Gypsy and Traveller pitches the Council has considered the ongoing need for a Travelling Showperson's yard within the Borough, currently at Spinney Lane/Whittleford Road, Nuneaton. This is the only such type of accommodation in Warwickshire and thus has considerable importance to the County as an asset and also by ensuring continuity and availability of these plots within the Borough it contributes towards provision. The issues and options consultation document proposed the safeguarding of the site for its current use given its special status in the County. Comments were sparse on this matter, but no responses were received stating that safeguarding of this site for this purpose was

incompatible with surrounding land uses or unacceptable. The Habitats Regulations Report and the Sustainability Appraisal Report both conclude that there would be no significant adverse impacts from the identified land continuing to be used for its current use.

5.0 Monitoring

- 5.1 The Council produces annually an Authority Monitoring Report (AMR). Within the AMR the performance of the policies in the Borough Plan are reported as well as those in other DPDs (Development Plan Documents). Therefore, the AMR will need to report on the policies of the performance of this DPD once it has been adopted. Table 3 below sets out the indicators and targets that will be used to monitor the policies of this DPD.

Table 3 - Monitoring indicators and targets for the policies of the Gypsy and Traveller Site Allocations Development Plan Document (DPD).

Policy	Indicator	Target
Strategic Policy GT1 – Overall Need	Monitor the continued need for additional pitches.	Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.
Strategic Policy GT2 – Strategy	Sites permitted in accordance with the criteria mentioned in policy GT2.	100%. Timescales as below.
Policy GT3 – Site Allocations	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report. Contact the proposed sites on a yearly basis after the AMR to encourage the sites to come forwards and answer any concerns the owners may have on bringing the sites forwards at that time.	A minimum of six additional residential pitches permitted and available for use by 2025 and a minimum of 11 additional residential pitches permitted and available by 2037.
Policy GT4 – Site Safeguarding	Monitor the use of the safeguarded site.	The identified site at Spinney Lane/Whittleford Road, Nuneaton to remain used for Travelling Showpeople unless it is clearly demonstrated that the site is no longer required for Travelling Showpeople accommodation.

Appendix 1

Relationship between the policies in this DPD and the extant Borough Plan.

Existing Borough Plan policies	Effect of Gypsy and Traveller Site Allocations DPD policies
Policy DS4 – Overall development needs (third bullet point only).	Superseded by Strategic Policy GT1 – Overall Need.
Policy H3 – Gypsies and Travellers.	Superseded by Strategic Policy GT2– Strategy.

For reference Policy DS4 Overall development needs should now read:

The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2011 and 2031:

- *At least 14,060 homes*
- *At least 107.8 ha of employment land*
- ~~*At least 39 residential pitches and 5 transit pitches to accommodate Gypsies and Travellers*~~

Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD

Inspector: Thomas Hatfield BA (Hons) MA MRTPI

Programme Officer: Helen Wilson

Reference: PINS/W3710/429/5

CD 6.2 - Schedule of Main Modifications

(Further Additional Modifications are provided in CD 6.3).

June 2023

This document (CD 6.2) provides details of the Main Modifications that are recommended by the Inspector to make the DPD sound and legally compliant.

The Additional Modifications found in the separate document (CD 6.3) are those which do not materially affect the Policies in the DPD, but which are generally minor factual updates; corrections of any errors or which are considered necessary for clarity.

Main Modification Reference	DPD Sub Section/ Paragraph/Policy box/table/Page number of amended DPD	Proposed Main Modification. (New words added in bold and underlined. Deletions stricken through.)	Reasons for modification
MM1	'1.0 Introduction'/ Paragraph1.2/ Page 1	Alter minor wording and add text at end of paragraph to read: "1.2 Policies DS4 – Overall development needs and H3 – Gypsies and Travellers set out the need for new pitches by 2031/2032 to be at least 39 residential and 5 transit pitches. Policy H3 does not set out where the new pitches would be provided but sets out the criteria that will be used to identify potential locations for residential and permanent pitches through the Gypsy and Traveller Site Allocations Development Plan Document (DPD). It is through this DPD that land <u>is</u> identified and allocated for future traveller sites. <u>Policy H3 of the current adopted Borough Plan (2011-2031) is superseded entirely by the DPD and in the emerging Borough Plan Policy H3 will purely refer to the DPD for Policies relating to Gypsy, Travellers and Showperson pitches and plots.</u> "	To make clear that Policy H3 of the current adopted Borough Plan (2011-2031) is superseded by the Gypsy and Traveller Site Allocations DPD. To state that Policy H3 of the emerging Borough Plan will be amended purely to refer to Policies within the Gypsy and Traveller Site Allocations DPD.
MM2	'3.0 Need/Future Need'/ Paragraph 3.9/ Page 7	Add text within paragraph to read: "3.9 In the 2021 GTAA it is recommended that the <i>"...evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth."</i> This is an important element of confirming that the need in this DPD remains as required. <u>It is therefore the Council's intention that the number of new pitches will be assessed each year at the Authority</u>	To clearly set out what will be carried out at the AMR stage in order to encourage sites coming forwards and when the DPD will be reviewed.

		<p><u>Monitoring Report (AMR) stage and landowners contacted to encourage the sites to come forwards. The DPD will be reviewed five years after adoption and subsequently five years thereafter on an ongoing basis, to ensure the document meets the current needs.</u> The update of the GTAA is referenced in Table 3 of Chapter 5.0 on Monitoring of this document. Should need be found to have changed beyond that set out in this DPD (or indeed for another reason such as undeliverability of a site or sites) then this should trigger a review of this DPD.”</p>	
MM3	Strategic ‘Policy GT1 – Overall Need’/ Page 8	<p>Add text at end of Policy to read: “The following levels of development will be planned for and provided within Nuneaton and Bedworth Borough between 2021 and 2037:</p> <ul style="list-style-type: none"> • At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025; and • At least a further 5 permanent residential pitches beyond those required by 2025 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2037. <p><u>This Policy supersedes the third bullet point of Policy DS4 of the adopted Borough Plan (2011-31).”</u></p>	<p>To make clear that the numbers for pitches within the existing Borough Plan (2011-2031) and the period of cover.</p> <p>This modification is also necessary to clarify which section of the existing Local Plan is superseded by the DPD.</p>
MM4	‘4.0 Location of Pitches’/ Under new sub section ‘Green Belt’/ Paragraph 4.3 and new paragraph 4.4/ Pages 9 and 10	<p>Delete whole paragraph as follows: “4.3 Notwithstanding the above, of all the occupied pitches, and plots on site/yards for gypsies and travellers all but one (that at Watling Street) are within the Green Belt including the local authority provision at Griff. The</p>	<p>Clarity of the position of the sites in relation to Green Belt Policy and to be consistent with existing Borough Plan.</p>

		<p>travelling showperson's yard is also outside of the Green Belt."</p> <p>Replace paragraph 4.3 to read:</p> <p><u>"4.3 Sunrise Cottage and The Old Nursery are not currently being considered for the removal of their Green Belt status. The removal of the two sites from the Green Belt would not be consistent with Policy DS7 of the current Borough Plan (and would be noncompliant with Regulation 8(4) of the 2012 Regulations) which is the Part 1 plan. Notwithstanding this, the Borough Plan is currently being reviewed and the Green Belt status of these two sites may be revisited, if necessary, when the Borough Plan is updated as part of a wider review of the Green Belt. However, the Site Assessments and the Green Belt document explains how the Green Belt sites may be considered suitable for development subject to meeting national policy for the Green Belt.</u></p> <p>Add complete new paragraph to read:</p> <p><u>"4.4 If future planning applications on these sites are considered to be inappropriate development in the Green Belt, then it would be necessary to demonstrate 'very special circumstances' in accordance with the Framework. In this regard, the allocation of these sites for new gypsy and traveller pitches in this DPD will be an important consideration in any such assessment."</u></p>	
MM5	'4.0 Location of Pitches'/ Now under new sub section	<p>Amend and add to paragraph to read:</p> <p>"4.6 Sites should also avoid locations that would impact upon land that has been designated for its interest, so, sites of</p>	Reference to Policy H3 removed as to be superseded. Instead

	'Sustainability'/ Previously Paragraph 4.5 now 4.6/ Page 10	ecological, heritage, or geological value. Similarly, contaminated land, land prone to flooding, and land in a sensitive landscape should also be avoided. These and other criteria for selecting new gypsy and traveller sites are set out in Policy H3— Gypsies and Travellers of the current Borough Plan. <u>GT2 Strategy.</u>	refers to Policies within DPD.
MM6	'4.0 Location of Pitches'/ under sub section 'Locational Strategy'/ Previously Paragraph 4.6 now 4.7/ Page 10	Delete, add and amend some wording in paragraph as follows: "4.7 The fundamental purpose of the Gypsy and Traveller Site Allocations DPD is to allocate land to provide for the number of pitches identified as the need by 2036/37. <u>for the required need to 2037.</u> The Issues and Options consultation draft proposed four strategies for allocating new pitches. These were all assessed within the accompanying sustainability appraisal and two of the options were found to be the most sustainable, namely the following: A. Seek to allocate new pitches firstly within the permitted area of existing sites and/or adjacent to these sites, then based on walking distances to services, and then by existing Policy H3. D. Seek to allocate new pitches firstly within the permitted site area of existing sites, then adjacent to these existing pitches, then based on walking distances to services. Use existing Policy H3 only once sites have been allocated by any of the other means and then only if insufficient has been allocated. <u>the criteria set out in the latter part of the policy.</u> "	Make clear the cover period of the DPD. Remove reference to acceptability of walking distance as the location of the sites is unable to comply with this.
MM7	'4.0 Location of Pitches'/ under sub section 'Locational	Amend typing error from 'of' to "is". Delete one sentence to read:	To remove reference to the future use of

	Strategy'/Previously Paragraph 4.7 now 4.8/ Pages 10-11	<p>"4.8 Respondents to the issues and options selected only options A and D – with an even split of numbers to these two options from respondents. Options A and D – the first difference is that option A uses extant Policy H3 to assess sites at the outset whilst option D only uses extant Policy H3 once insufficient sites have been found via other means. The second difference if <u>is</u> that option D separates out the permitted areas of existing sites from land adjacent to existing sites whereas option A does not and treats them together. It is considered that option D should form the basis of the allocation of new pitches as it allows for the consideration of the permitted site area of existing sites first (and in isolation) and this has the potential for the least impact. However, in hindsight, the use of the word 'adjacent' could give rise to some ambiguity and the word 'adjoining' will be used instead to emphasise that there should be a physical relationship between the new and the existing. Also, another benefit of using option D is that Policy H3 is only used as a fallback if insufficient pitches have been found via other means rather than from the outset. It should be noted that should planning applications be made for new pitches on unallocated sites then the strategic policy in this DPD would be used as the starting point to assess their suitability."</p>	Policy H3 of extant Borough Plan.
MM8	'4.0 Location of Pitches'/ under sub section 'Locational Strategy'/ Previously Paragraph 4.8	<p>Delete whole paragraph as follows:</p> <p>"4.8 In terms of walking distances to services a number of different ways in which this could be measured were suggested in the issues and options document and these ranged from 2-3 miles for school to 800 metres to a town centre. The intermediate distance was 1.6 kilometres to</p>	Remove reference to walking distance of sites to services to reflect revised policy wording

		<p>GPs (General Practitioners) and pharmacies. Given the above range of different ways to measure walking distances to specific services and that, ideally, access should be all of these, it seems a good compromise to use the intermediate distance, and this shall be used within the strategic policy.”</p>	
MM9	<p>‘4.0 Location of Pitches’/under sub section ‘Locational Strategy’/ Paragraph 4.9/ Page 11</p>	<p>Omit and amend wording to read:</p> <p>“4.9 Based on the above the strategy is a tiered approach whereby land that is being developed for new pitches will be assessed against the three priority land uses. In terms of allocations, land will be allocated in the order set out in the policy so that the priority will be to allocate land that meets priority one in the first instance. If insufficient pitches to meet the Borough’s needs are found to be acceptable then land use priority two will be used and then land use priority three. If insufficient remains allocated, then Policy H3 will be used. In terms of planning applications these are standalone parcels of land that cannot be dealt with by the same process and, thus, any of the three priority land uses would be acceptable subject to all other matters of the proposal being found acceptable. Policy H3 of the extant Borough Plan is only utilised if there is insufficient provision to meet the identified need for new pitches. <u>Policy GT2 identifies that new gypsy and traveller pitches will generally be supported within the sites allocated within GT3 or within the permitted area of existing lawful, authorised gypsy and traveller sites. In addition, to ensure that consideration is given to sustainability, any new sites that come forwards within the urban area (as shown within the settlement boundary of</u></p>	<p>Deleted reference to H3 of the extant Borough Plan and to clarify the criteria in GT2 and GT3 is instead used for allocating acceptable sites.</p>

		<p><u>Policy DS2 of the Borough Plan). In addition, land adjoining the permitted area of existing lawful, authorised gypsy and traveller sites will be considered as long as these are in proportion appropriate to the scale of the existing site. The intention is to supersede entirely Policy H3 in the current adopted Plan (2011 – 2031). Within the emerging Borough Plan (2024 – 2039) emerging Policy H3 will simply signpost to the adopted DPD for guidance on any new pitches or plots.”</u></p>	
MM10	Strategic ‘Policy GT2 Strategy’/ Pages 11 and 12	<p>Amend, omit, and add to read: “Planning permission will be granted for new gypsy and traveller pitches subject to compliance with other policies of the development plan <u>and with national policy including in relation to Green Belt</u> in the following priority land uses <u>on the following land:</u></p> <ul style="list-style-type: none"> a) <u>Sites allocated in Policy GT3 or</u> within the permitted area of existing lawful, authorised gypsy and traveller sites; or b) <u>Sites within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan);</u> or c) then land adjoining the permitted area of existing lawful, authorised gypsy and traveller sites; ___d) then land within 1.6 kilometres of appropriate services, such as schools, GP surgeries, shops, and these services being capable of being accessed safely by foot. <u>Extensions adjoining the permitted area of existing lawful, authorised gypsy and traveller sites that are proportionate in scale to the existing site.</u> 	<p>See note above. Instead of having to demonstrate the priority land uses all the criteria is equally acceptable. Thus, negating a staged approach to the criteria.</p>

		<p><u>Any proposed sites considered must comply with all of the following:</u></p> <ul style="list-style-type: none"> a) <u>The site should have reasonable access to essential services including health and education facilities and access to local shops;</u> b) <u>The number of pitches or plots is in proportion to the size and scale of the site;</u> c) <u>The number of pitches or plots is in proportion to the size and density of the nearest settled community;</u> d) <u>The site is not located in areas of high flood risk;</u> e) <u>The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets;</u> f) <u>The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected;</u> g) <u>The site has suitable access to the highway network;</u> h) <u>The site is located where air or noise pollution will not significantly affect the health and well-being of site residents; and</u> i) <u>The site has suitable connection to the foul sewage system or can demonstrate that connection is unviable and alternative arrangements can be made.</u> <p>If there is insufficient provision to meet the minimum needs identified in Strategic Policy GT1 — Overall Need then extant Policy H3 — Gypsies and Travellers of the Borough Plan will be used to determine the acceptability of the new development.</p> <p><u>This Policy supersedes Policy H3 of the adopted Borough Plan (2011-31)."</u></p>	
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MM11	Supporting text under Strategic 'Policy GT2 Strategy'. Under subheading 'Allocation of Sites'/ Previously Paragraph 4.12 now 4.13/ Page 13	Sentences omitted at beginning of paragraph to read: "4.13 This site does not meet the three bullet points of Strategic Policy GT2 – Strategy but the policy allows for sites in other locations that accord with Policy H3 where the need set out in Strategic Policy GT1 – Overall Need has not been met. The other two sites would provide nine pitches, leaving a shortfall of two pitches to meet the identified need. An assessment of the site against Policy H3 has concluded that the site would be acceptable for allocation. The number of pitches provided by the three sites found acceptable for allocation would provide 14-15 pitches which would, firstly, meet the minimum 11 pitches required and, secondly, build in some resilience should the anticipated levels of turnover at The Griff not take place."	Removed reference to Policy H3 of Borough Plan so reference to this has been removed for clarity.
MM12	Supporting text under Strategic 'Policy GT2 Strategy'. under subheading 'Allocation of Sites'/ Previously Paragraph 4.15 now 4.16/ Page 13	Deleted sentences at end of paragraph to read: "4.16 The need for new gypsy and traveller pitches set out in Strategic Policy GT1 – Overall Need is for at least 11 permanent residential pitches to accommodate Gypsies and Travellers. The sites that have been found acceptable to allocate would provide up to 15 pitches at three locations and these are set out in Policy GT3 – Site Allocations. Below the policy an accompanying plan is provided showing the area to which the allocation relates." Two of the sites are within the Green Belt, namely Sunrise Cottage and The Old Nursery, and these have been found to meet the terms of exceptions and thus allowable development in the Green Belt. The extant proposals map will need to be updated to remove these two sites from the Green Belt.	Omitted the requirement to remove sites from the Green Belt as there is no intention of removing these sites within the extant Borough Plan which would have meant the DPD conflicted with the extant Local Plan.

MM13	Strategic 'Policy GT3 – Site Allocations'/ Pages 15 and 16	<p>Additions to the Policy to read:</p> <p>“Planning permission will be granted for new gypsy and traveller pitches at the following sites and as denoted with a solid red line on the accompanying site plans:</p> <p>GTSA1 – Sunrise Cottage for three additional pitches within the existing site as shown as a solid red line on the accompanying plan.</p> <p>GTSA2 – The Old Nursery for five to six new pitches within the site as shown as a solid red line on the accompanying plan.</p> <p>GTSA3 - Winter Oak for six additional pitches within the existing site as shown as a solid red line on the accompanying plan.</p> <p><u>Key Development Requirements</u></p> <p>Planning applications at the allocated sites shall contain the details as set out below:</p> <p>GTSA1 – Sunrise Cottage</p> <ul style="list-style-type: none"> • Provision of visibility splays of 160 metres. • Suitable bin collection points should be provided within the site so that bins are not stored within the highway. • Preliminary Ecological Assessment. • <u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.</u> 	Added requirements that became apparent during the Publication consultation process.
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		<p>GTSA2 – The Old Nursery</p> <ul style="list-style-type: none"> • Closure of the northern access within the site. • Access to be made in and out of the site from the southern access within the site. • Configuration of an access that allows for sufficient manoeuvring room for any vehicles entering/exiting the site. • Any gates within the access to be setback sufficient distance to allow any vehicle entering the site to exit the highway completely whilst the gates are opened or closed. • Provision of visibility splays of 160 metres. • Suitable bin collection points should be provided within the site so that bins are not stored within the highway. • Landscaping of the site boundary to soften the appearance of the pitches from external views. • Preliminary Ecological Assessment. • Retention of existing boundary vegetation. • Provision of communal play area within the site. • <u>Address any contamination on the site.</u> • <u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.</u> <p>GTSA3 – Winter Oak</p>	
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		<ul style="list-style-type: none"> • Suitable bin collection points should be provided within the site so that bins are not stored within the highway. • Preliminary Ecological Assessment. • Retention of existing boundary vegetation. • <u>Provision of communal play area within the site.</u> • <u>Ensure air and noise quality to future residents of the site is acceptable.</u> • <u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water quality will need to be considered.”</u> 	
MM14	Strategic ‘Policy GT4 – Site Safeguarding’/ Page 19	<p>Amend and omit some wording to read: “The travelling showpeople site at Spinney Lane/Whittleford Road, Nuneaton as denoted on plan GTSA4 with a solid red line will be safeguarded for use by travelling showpeople.</p> <p>Alternative uses will <u>only</u> be permitted if it is <u>clearly demonstrated</u> proven that either there is no longer a requirement <u>the site is no longer required</u> for travelling showpeople accommodation.” or that an alternative site for travelling showpeople is available within Warwickshire.</p>	Reworded Policy in order to require demonstration if the site is no longer required and deleted reference to the removal of the protection in the event a new site is located in Warwickshire which is unlikely to happen.
MM15	‘5.0 Monitoring’/Table 3/ Page 21	<p>Omit and amend some wording in the table to read: “Table 3 - Monitoring indicators and targets for the policies of the Gypsy and Traveller Site Allocations Development Plan Document (DPD).</p>	Make clearer the monitoring process and requirement for a new Accommodation Assessment Survey to see if the number of

			Policy	Indicator	Target	pitches has changed and therefore requires amending. Amend wording to replicate the wording within Policy GT4.
			Strategic Policy GT1 – Overall Need	Gypsy and traveller accommodation.	11 residential pitches Provided.	
				Monitor the continued need for additional pitches.	Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.	
			Strategic Policy GT2 – Strategy	Sites permitted in accordance with the <u>policy criteria mentioned in policy GT2.</u>	100%. <u>Timescales as below.</u>	

			<p>Policy GT3 – Site Allocations</p> <p>Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report. <u>Contact the proposed sites on a yearly basis after the AMR to encourage the sites to come forwards and answer any concerns the owners may have on bringing the sites forwards at that time</u></p>	<p>A minimum of six additional residential pitches permitted and available for use by 2025/26 and a minimum of 11 additional residential pitches permitted and available by 2036/37.</p>	
			<p>Policy GT4 – Site Safeguarding</p> <p>Monitor the use of the safeguarded site.</p>	<p>The identified site at Spinney Lane/Whittleford Road, Nuneaton to remain used for travelling showpeople unless it is was</p>	

					proven to be no longer required. <u>clearly demonstrated that the site is no longer required for travelling showpeople accommodation</u>							
MM16	'Appendix 1'/Table/Page 22	<div>Omit and amend some wording to read: “Relationship between the policies in this DPD and the extant Borough Plan.</div> <table><tr><td>Superseded Existing Borough Plan policies</td><td>Superseding Effect of Gypsy and Traveller Site Allocations DPD policies</td></tr><tr><td>Policy DS4 – Overall development needs (third bullet point only).</td><td>Superseded by Strategic Policy GT1 – Overall Need.</td></tr><tr><td>Policy H3 – Gypsies and Travellers. (figures contained in first sentence)</td><td>Superseded by Strategic Policy GT1 – Overall Need. <u>GT2 – Strategy</u> –.</td></tr></table>				Superseded Existing Borough Plan policies	Superseding Effect of Gypsy and Traveller Site Allocations DPD policies	Policy DS4 – Overall development needs (third bullet point only).	Superseded by Strategic Policy GT1 – Overall Need.	Policy H3 – Gypsies and Travellers. (figures contained in first sentence)	Superseded by Strategic Policy GT1 – Overall Need. <u>GT2 – Strategy</u> –.	To make clearer what is to be superseded in the extant Borough Plan when the DPD is adopted.
Superseded Existing Borough Plan policies	Superseding Effect of Gypsy and Traveller Site Allocations DPD policies											
Policy DS4 – Overall development needs (third bullet point only).	Superseded by Strategic Policy GT1 – Overall Need.											
Policy H3 – Gypsies and Travellers. (figures contained in first sentence)	Superseded by Strategic Policy GT1 – Overall Need. <u>GT2 – Strategy</u> –.											
MM17	'Appendix 1'/ Supporting text to table / Page 22	<div>Add to appendix to read: “For reference Policy DS4 Overall development needs should now read: <u>The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2011 and 2031:</u> • <u>At least 14,060 homes</u> • <u>At least 107.8 ha of employment land</u></div>				To make clear that reference to pitches in third bullet point of Policy DS4 of the extant Borough Plan is to be deleted.						

		<ul style="list-style-type: none">• <u>At least 39 residential pitches and 5 transit pitches to accommodate Gypsies and Travellers"</u>	
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Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD

Inspector: Thomas Hatfield BA (Hons) MA MRTPI

Programme Officer: Helen Wilson

Reference: PINS/W3710/429/5

CD 6.3-Schedule of Additional Modifications

(Main Modifications provided in CD 6.2)

December 2023

The separate document (CD 6.2) provides details of the Main Modifications that are recommended by the Inspector to make the DPD sound and legally compliant.

The Additional Modifications found in this document (CD 6.3) are those which do not materially affect the Policies in the DPD, but which are generally minor factual updates; corrections of any errors or which are considered necessary for clarity.

Additional Modifications considered necessary

Additional Modification Reference	DPD Sub Section/ Paragraph/Policy box/table/Page number of amended DPD	Proposed Main Modification. (New wording added in bold and underlined. Deletions stricken through.)	Reasons for modification
Additional Modification M1	Front page	Omit text as follows: “ Publication consultation draft ”.	Once adopted the document will not be the Publication version or draft.
Additional Modification M2	Front page	Add text as follows: “ <u>2021 – 2037</u> ”	To clarify the cover period proposed.
Additional Modification M3	‘Table of contents’/ Page i	Pages numbers need to be amended once finalised. Delete reference to ‘Conclusion’ from table.	To show changes to the page numbering and the proposed deletion of the conclusion section.
Additional Modification M4	‘1.0 Introduction’/ Paragraph 1.4/ Page 1	Amending wording to read: “1.4 <u>This adopted DPD was preceded</u> This document is by the Publication <u>version</u> of the Gypsy and Traveller Site Allocations DPD; <u>which was</u> this is the formal document as required by Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. <u>This was consulted on between 28th January 2022 and 25th March 2022</u> . A consultation on the previous version of the Gypsy and Traveller Site Allocations DPD, the Issues and Options consultation draft, took place between 11 th June 2021 and 6 th August 2021. This document was that required by Regulation 18 of The	The original paragraph was for the Publication version during consultation and needs to be changed to reflect the DPD, with modifications agreed with the Planning Inspectorate in order to be adopted.

		Town and Country Planning (Local Planning) (England) Regulations 2012. A consultation statement has been produced which sets out the responses received and how they <u>were</u> have been considered in producing <u>the</u> is next version of the DPD.”	
Additional Modification M5	‘1.0 Introduction’/ Paragraph 1.5/ Page 1	Delete reference to conclusion to read: “1.5 The document is set out in five <u>four</u> subsequent chapters addressing the vision and objectives of the DPD, followed by the need for new pitches, the locations of these new pitches <u>and</u> a monitoring schedule for the DPD.”; and a conclusion.	To delete reference to the conclusion as conclusion has been deleted as not considered necessary.
Additional Modification M6	‘3.0 Need’ under sub section ‘Introduction’/ Paragraph 3.3/ Page 4	Delete last sentence to read: “3.3 Using the requirement for new pitches from the 2021 GTAA as a minimum rather than the higher figures in the extant Borough Plan means that this document will need to supersede the requirements for new pitches set out in Policies DS4 and H3 of the Borough Plan. The Borough Plan is being reviewed and these policies will be looked at, but this process is running behind this document so for an interim period the policy on need in this document will have to take precedence over that in the adopted Borough Plan. ”	Deleted as contradicts paragraph 4.9
Additional Modification M7	‘4.0 Location of Pitches’ under sub section ‘Introduction’/ First sub section title / Page 9	Amend sub section heading from “Introduction” to: “ <u>Green Belt</u> ”	To make clearer the reference to Green Belt within the document.
Additional Modification M8	‘4.0 Location of Pitches’/Under sub section ‘Green Belt’/ Paragraph 4.1/Page 9	Add to beginning of paragraph to read: “4.1 <u>Two of the sites to receive new pitches are within the Green Belt, namely Sunrise Cottage and The Old</u>	To make clearer that two of the sites are within Green Belt.

		<p><u>Nursery.</u> Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt and Green Belt forms a large part of the borough. The Green Belt is mostly located to the south of Nuneaton, but also surrounds the main areas of Bedworth, Bulkington, and Ash Green. Nationally, the government attaches great importance to the Green Belt. The five key purposes of Green Belts are:</p> <ul style="list-style-type: none"> • to check the unrestricted sprawl of large built-up areas; • to prevent neighbouring towns merging into one another; • to assist in safeguarding the countryside from encroachment; • to preserve the setting and special character of historic towns; and • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land." 	
Additional Modification M9	'4.0 Location of Pitches'/ Heading before Paragraph 4.4 now 4.5/ Page 10	Add subsection heading as follows: " <u>Sustainability</u> ".	Added sub section as consideration needed to be given to sustainability of the sites.
Additional Modification M10	'4.0 Location of Pitches'/Under sub section 'Sustainability' and 'Locational Strategy'/ Paragraphs 4.3 to 4.8/ Pages 9 -11	Paragraphs renumbered.	
Additional Modification M11	'4.0 Location of Pitches'/Under sub section 'Sustainability'/ Previously Paragraph 4.4 now Paragraph 4.5/ Page 10	Replace one word to read: "4.5 Beyond the issue of the Green Belt, which is a significant matter, there are other factors that may need consideration for the locating of new gypsy and traveller pitches. Sites should have good <u>reasonable</u> access to	To reflect the wording in Policy GT2

		services, such as shops, schools, GP surgeries, and pharmacies, and this access should be capable of being done by modes of transport other than private car. Walking is the easiest and cheapest way to access services and thus is the focus for accessibility. However, many of the current sites are limited by their options for modes of travel.”	
Additional Modification M12	Supporting text under ‘Strategic Policy GT2 Strategy’/ New paragraph number 4.10/ Page 12	Add new paragraph as follows: <u>“4.10 Where alternative methods for foul water treatment such as septic tanks or cesspits are required; consent will be required from the Environment Agency for an Environmental Permit (Regulations 2016). This is to enable the discharge of polluting substances (including sewage effluent) into surface waters or the ground. It is the Applicants responsibility to make the appropriate enquiries regarding any Environmental Permit requirements. (Environmental Permitting Guidance can be found at: https://www.gov.uk/environmental-permit-check-if-you-need-one”</u>	Paragraph required due to response from the Environment Agency to the Publication version.
Additional Modification M13	Supporting text under Strategic ‘Policy GT2 Strategy’. Under subheading ‘Allocation of Sites’/ Paragraphs 4.10 to 4.20/ Pages 12-14	Paragraphs renumbered.	
Additional Modification M14	Supporting text under Strategic ‘Policy GT2 Strategy’. Under subheading ‘Allocation of Sites’. Previously paragraph 4.11 now paragraph 4.12/ Page 12 and 13	Two words deleted to read: “4.12 The 2021 GTAA also identified another site that had the potential to accommodate new pitches but this through the physical expansion of the site. This was the privately owned site at Fella's Acre, Mile Tree Lane, Bulkington	Words deleted as no longer required.

		<p>which it was considered could accommodate an additional two pitches. This was also independently assessed and following this the site was deemed to be unsuitable for expansion – mainly relating to deliverability. However, the landowner expressed an interest in developing another site for new pitches, namely The Old Nursery, Parrotts Grove, Coventry. This has been independently assessed and it was concluded that the site could be developed to provide five to six new pitches. The site has also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in this location.”</p>	
Additional Modification M15	Previously Paragraph 4.20 now 4.21/ Page 14	<p>Amend wording and some deletions to read: “4.21 The matter of flooding is not addressed because at this time it is not considered to be relevant as sites are in flood zone 1 and there is no indication that they suffer inundation. However, areas prone to flooding change <u>climate change means that this could change</u> and should this then be the case <u>then</u> extant Policy NE4 – Managing flood risk and water quality (<u>Borough Plan</u>) would be used.” Similarly, sewage connection is not a key development requirement as this is already addressed by bullet point number 9 of extant H3 – Gypsies and Travellers.</p>	<p>Include reference to climate change that could mean the sites change from Flood Zone 1 in the future.</p>
Additional Modification M16	Supporting text to Strategic ‘Policy GT3 – Site Allocations’/ Page 18	<p>Add new paragraph to read: <u>“4.22 For site GTSA3 – Winter Oak, it is suggested that prior to any submission of a planning application, that the Applicant contacts National Highways to discuss the access and the information they may</u></p>	<p>Required following the response from National Highways during the consultation of the</p>

		<u>require to be submitted for any formal submission. In addition, for this particular site, an Air Quality Exposure Assessment and Noise Assessment may be required to determine any formal planning application to inform of any mitigation required.”</u>	Publication document.
Additional Modification M17	Supporting text to Strategic ‘Policy GT3 – Site Allocations’ Previously Paragraph 4.21 now 4.23/ Page 19	<p>Delete paragraph from under red line plan of GTSA3 – Winter Oak as follows:</p> <p>4.23 As well as the allocation of sites for new gypsy and traveller pitches the Council has considered the ongoing need for a travelling showperson’s yard within the Borough, currently at Spinney Lane/Whittleford Road, Nuneaton. This is the only such type of accommodation in Warwickshire and thus has considerable importance to the County as an asset and also by ensuring continuity and availability of these plots within the Borough it contributes towards provision. The issues and options consultation document proposed the safeguarding of the site for its current use given its special status in the County. Comments were sparse on this matter, but no responses were received stating that safeguarding of this site for this purpose was incompatible with surrounding land uses or unacceptable. The Habitats Regulations Report and the Sustainability Appraisal Report both conclude that there would be no significant adverse impacts from the identified land continuing to be used for its current use.”</p> <p>Instead add as text under red line plan of GTSA4 – Site Safeguarding the following supporting text:</p> <p><u>“4.23 As well as the allocation of sites for new gypsy and traveller pitches the Council has considered the</u></p>	Amended position of paragraph to be within Policy GT4.

		<p><u>ongoing need for a travelling showperson's yard within the Borough, currently at Spinney Lane/Whittleford Road, Nuneaton. This is the only such type of accommodation in Warwickshire and thus has considerable importance to the County as an asset and also by ensuring continuity and availability of these plots within the Borough it contributes towards provision. The issues and options consultation document proposed the safeguarding of the site for its current use given its special status in the County. Comments were sparse on this matter, but no responses were received stating that safeguarding of this site for this purpose was incompatible with surrounding land uses or unacceptable. The Habitats Regulations Report and the Sustainability Appraisal Report both conclude that there would be no significant adverse impacts from the identified land continuing to be used for its current use."</u></p>	
Additional Modification M18	6.0 Conclusion	<p>Delete entire section:</p> <p>“6.0 Conclusion</p> <p>6.1 The issues and options document of the Gypsy and Traveller Site Allocations Development Plan Document (DPD) was the first stage of producing this DPD. It set out the key issues for the locating of new traveller sites, namely how many and where and the reasonable options for approaching these issues. The document contained 10 questions that the answers to helped inform this next (publication) version of the DPD.</p>	Conclusion not deemed necessary so deleted.

		6.2 This document seeks to provide for a minimum of 11 residential pitches in the borough for gypsies and travellers by 2036/37. To achieve these three parcels of land have been identified and allocated to provide at least 14 residential pitches. Also, the existing travelling showpeople site in Nuneaton has been safeguarded from alternative uses."	
Additional Modification M19	Throughout document. Paragraphs 1.1, 3.7, 3.8, 4.2, 4.4, 4.5, 4.6, 4.9, 4.14, 4.16, 4.19, 4.23 Title for table 1, within table 3. Policy GT2 – Strategy Policy GT3 – Site Allocations Policy GT4 – Site Safeguarding	Capitalised throughout document "Gypsies and Travellers and Travelling Showperson/Showpeople"	For consistency

NUNEATON AND BEDWORTH BOROUGH COUNCIL**EXTRAORDINARY COUNCIL****17th January, 2024**

An Extraordinary Council meeting of the Nuneaton and Bedworth Borough Council was held on Wednesday, 17th January 2024 which was recorded and uploaded to Youtube.

Present

The Mayor (Councillor M. Walsh)
The Deputy Mayor (Councillor B. Hammersley)

Councillors D. Brown, C. Cape, J. Clarke, T. Cooper, J. Coventry-Moreton, S. Croft, L. Cvetkovic, L. Downs, C. Golby, M. Green, J. Gutteridge, K. Kondakor, S. Markham, G. Moreton, B. Pandher, R. Baxter-Payne, J. Sheppard, T. Sheppard, E. Shiers, J. Singh, R. Smith, C. Watkins, M. Wright and K. Wilson

Apologies were received for Councillors B. Beetham, K. Evans, S. Harbison, N. Phillips, M. Tromans and R. Tromans

CL42 Declarations of Interests

RESOLVED that the Declarations of Interests for this meeting are as set out in the schedule attached to these minutes. In addition, the following was declared:

Councillor E. Shiers declared by way of an Other Interest that she has been appointed Director of Community Interest Company Chill supporting children with additional needs.

Councillor C. Golby declared a Disclosable Pecuniary Interest by way of her change in employment.

CL43 Announcements

There were no announcements.

CL44 Public Participation

None

CL45 Up-date on the Gypsy and Traveller Site Allocations Development Plan Document (DPD)

The Assistant Director – Planning submitted a report to full council, after Cabinet approval on 10th January 2024, to update Members on the Gypsy

and Traveller Site Allocations Development Plan Document (DPD);
 Consideration of the Planning Inspector's Report on the Examination of the
 DPD and to recommend to Council to approve the DPD after the Secretary of
 State – Planning Inspectorate has confirmed the Document is considered
 sound (Appendix A of the report).

Councillor R. Smith moved the recommendations for council approval.

Councillor K. Wilson seconded the recommendations.

A vote was taken.

RESOLVED that

- a) the public consultation responses be noted;
- b) the Gypsy and Traveller Site Allocations Development Plan Document (DPD) published in January 2022 as amended (Appendix B) by:
 - The Inspectors Final Report (Appendix A);
 - The schedule of Main Modifications recommended by the Inspector (Appendix C); and
 - The schedule of Additional Modifications (Appendix D)
 be adopted;
- c) upon the adopted Gypsy and Traveller Site Allocations DPD make available as soon as is practicable and in accordance with regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended):
 - The Inspectors Final Report.
 - The DPD.
 - An Adoption Statement.
 - The Sustainability Report and Addendum and Habitats Regulations Assessment and Main Modifications Habitats Regulations Assessment.
 - Details of where the DPD will be available for inspection and the places and times at which the document can be inspected.
 - Send a copy of the Adoption Statement to any person who has asked to be notified of the adoption of the DPD.
 - Send a copy of the Adoption Statement to the Secretary of State.
- d) the Assistant Director for Planning in consultation with the Portfolio Holder for Planning and Regulation be given Delegated Authority to make any further amendments such as minor typing or page numbering errors;
- e) the adopted Local Plan map be amended to include the site allocations; and

- f) the DPD will supersede the third bullet point of Adopted Borough Plan 2011-2031 Policy DS4 – Overall development needs and supersede all of Policy H3 – Gypsies and Travellers.

Mayor