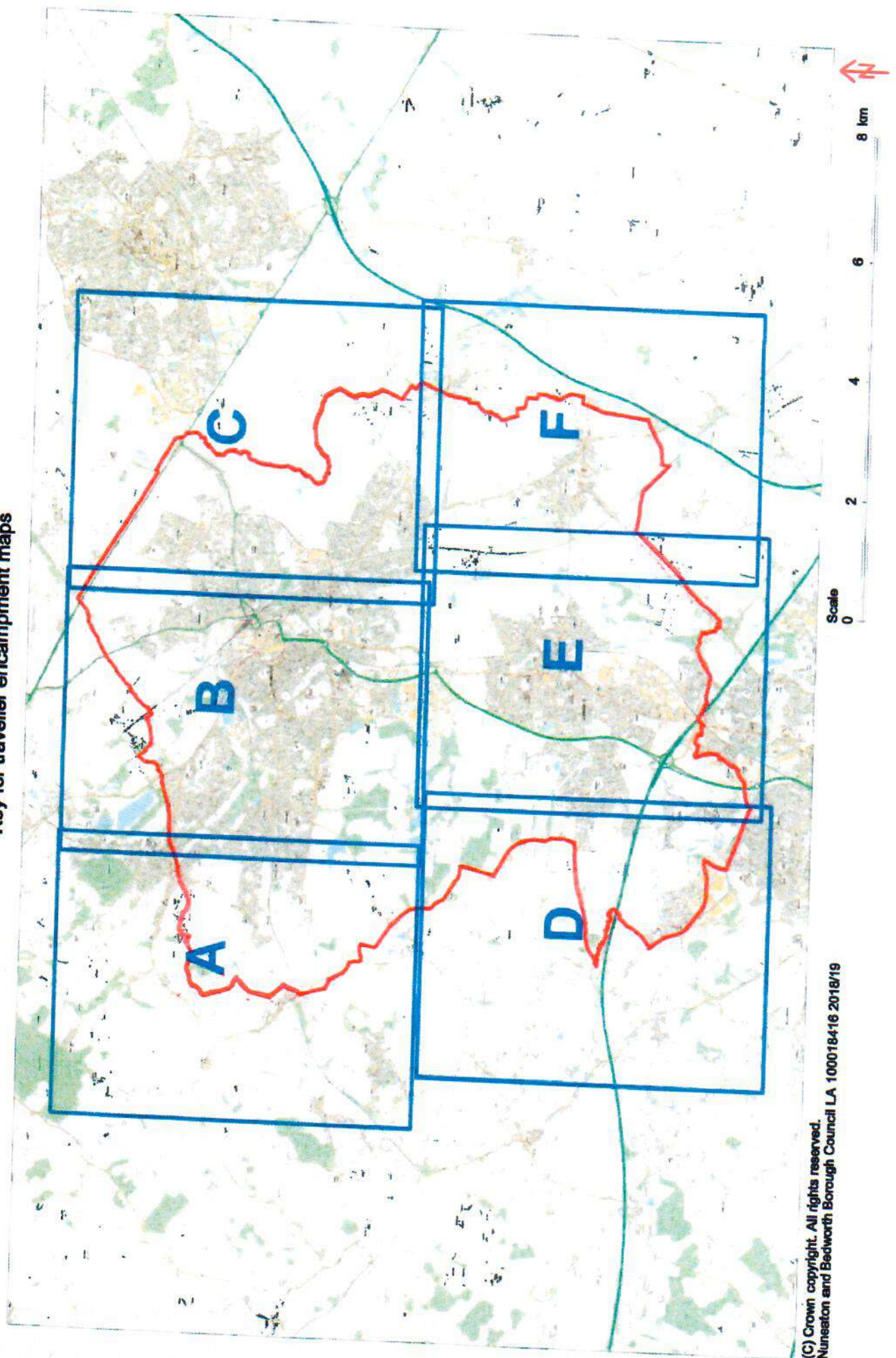


130 B	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓	CV11 4BE	Private	WK497842/WK497832
131 E	Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP	✗	CV12 0DP	WCC	WK426282
132 D	Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
"	Exhall Grange 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	✗	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	✗	CV11 4SQ	WCC	WK23140
137 B	Atleborough Mills, Atleborough Road, Nuneaton aka Holman Way	✗		Private	WK256088
138 B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton	✗	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	✗	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



A

Northwest Nuneaton



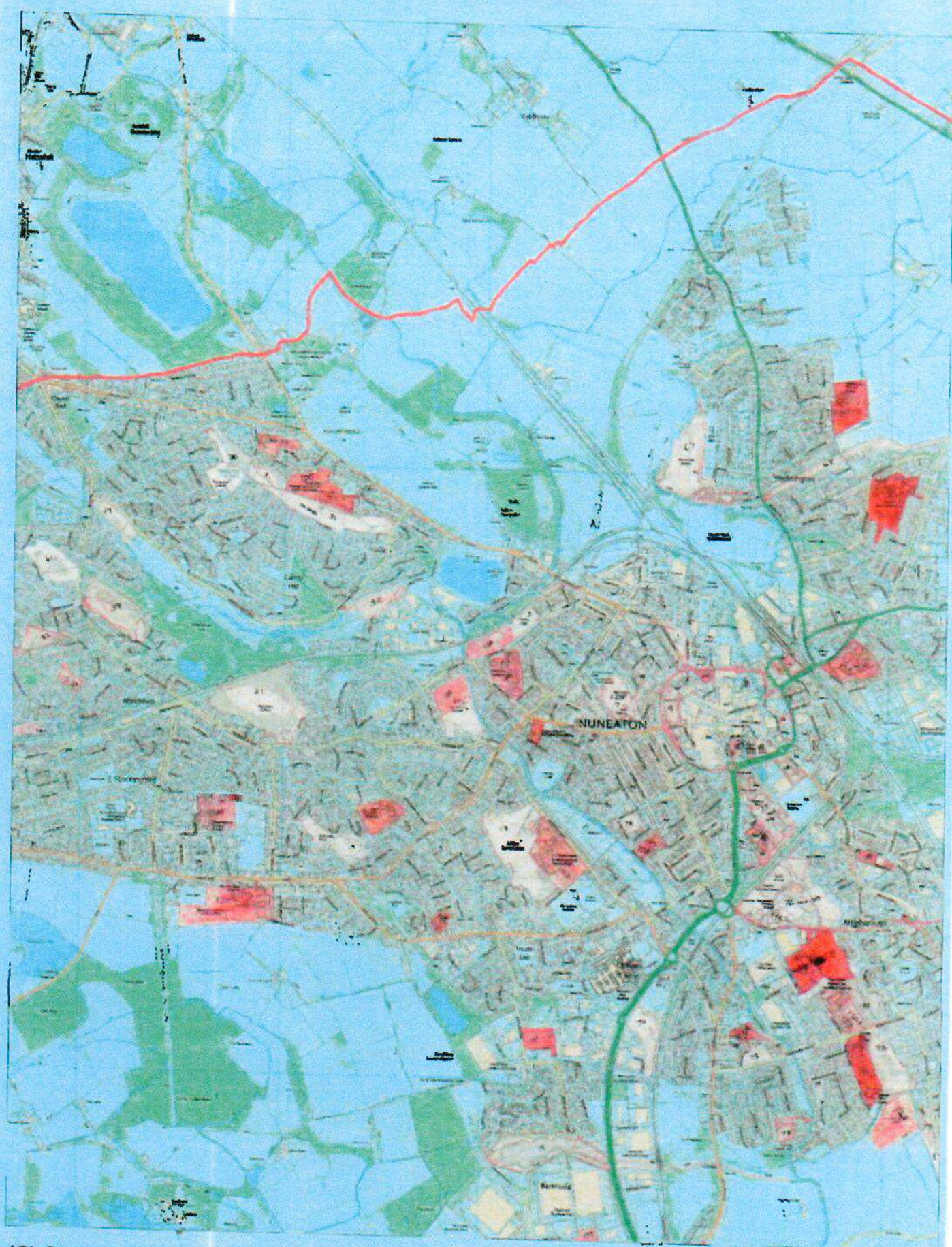
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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Scale
0 250 500 750 1000 m



B

North of Nuneaton

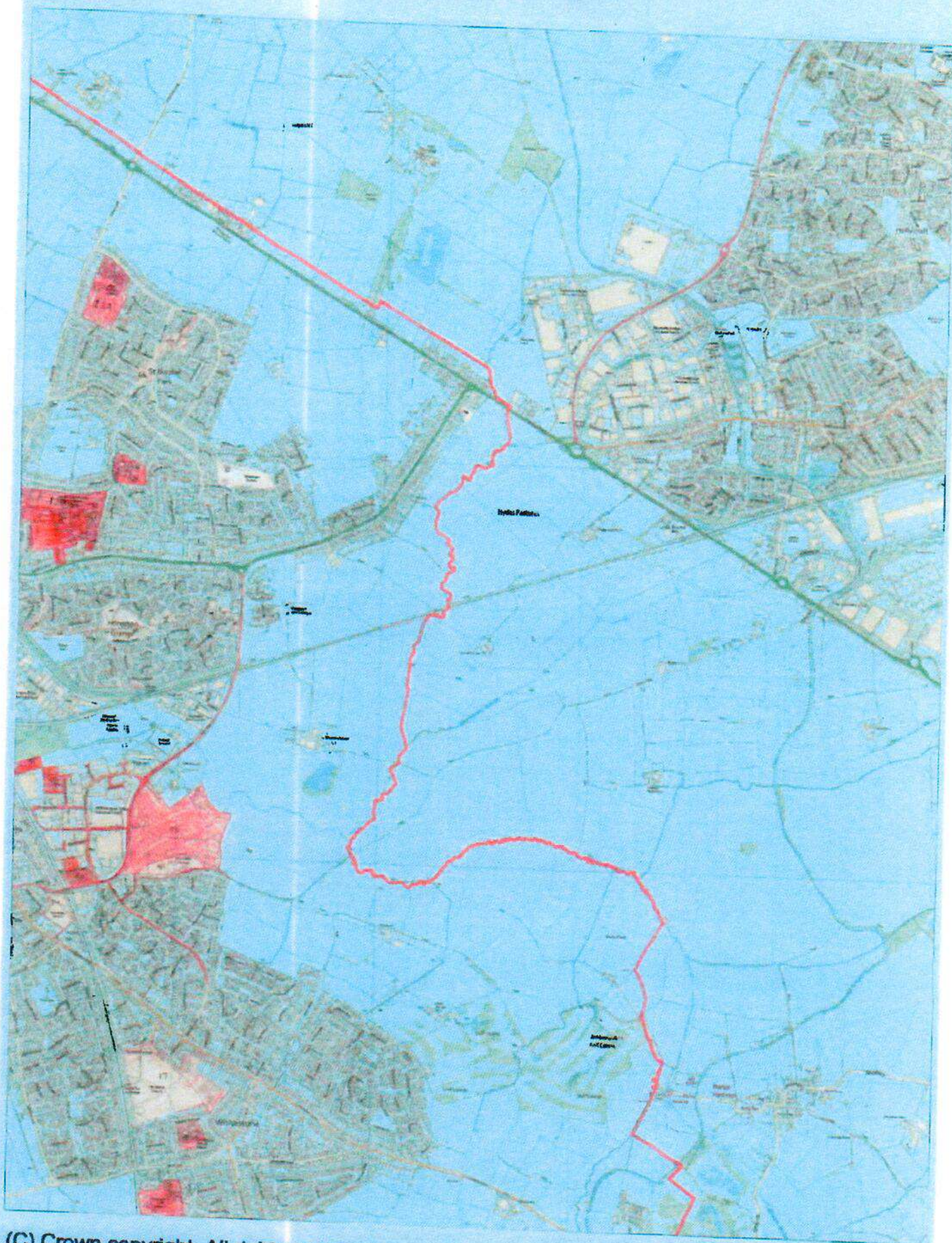


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100018416 2018/19

Scale
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C

Northeast Nuneaton



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Scale
0 250 500 750 1000 m

D

Southwest Bedworth



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Scale
0 250 500 750 1000 m

319

E

South of Bedworth



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100018416 2018/19

Scale
0 250 500 750 1000 m

320

F

Southeast Bedworth



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100018416 2018/19

Scale
0 250 500 750 1000 m



321

Claimant
John Andrew Ingram
Second
22nd May 2019
"JAI1-JAI3"

IN THE HIGH COURT OF JUSTICE

QB-2019-000616

QUEENS BENICH DIVISION

B E T W E E N:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) MR THOMAS CORCORAN AND 53 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

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

Defendants

SECOND WITNESS STATEMENT OF JOHN ANDREW INGRAM

I, John Andrew Ingram, of 212 Strand, London WC2R 1AP, Process Server for the purpose of service instructed by Nuneaton and Bedworth Borough Council of Town Hall, Coton Road, Nuneaton CV11 5AA, the Claimants, will say as follows: -

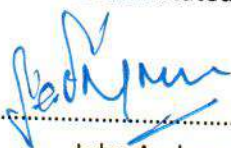
1. THAT in accordance with the Order of Timothy Straker QC dated 22nd March 2019, between 10.40hrs on Wednesday 10th April 2019 and 19.59 hrs on Friday 12th April 2019 effect service of 148 copies on 63 of the pieces of Land numbered 1 to 141 on schedule 3 attached to the Order by inserting a complete copy of the Order of Timothy Straker QC dated 22nd March 2019; Schedule 1 - List of defendants; Schedule 2 - Map of the Borough; Schedule 3 - List of Sites and Map for Persons unknown, in a sealed transparent waterproof envelope and by affixing all 148 copies in prominent positions at each entrance to the Land on each of the 63 sites served by me. All copies that were secured, were affixed with green duct tape so they would come to the attention of anyone attending at or entering the land.

2. A schedule detailing the exact site number, number of Orders served; site name and date of time served is now produced and shown to me marked "JA11"
3. True copies of the Order of the Order of Timothy Straker QC dated 22nd March 2019; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown, so served by me are now shown to me marked "JA12".
4. Copies of photographs taken by me by, only way of example of 5 out of 148 serves performed are now produced and shown to me in a bundle marked "JA13"

Statement of Truth

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

Signed:



John Andrew Ingram

Dated:

22nd May 2019

IN THE HIGH COURT OF JUSTICE

QB-2019-000616

QUEENS BENICH DIVISION

B E T W E E N:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) MR THOMAS CORCORAN AND 53 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

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

Defendants

"JAI 1"

This is the exhibit marked "JAI 1"

referred to in the Witness Statement of John Andrew Ingram

Statement of Truth

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

Signed:


John Andrew Ingram

Dated: 22nd May 2019

Nuneaton and Bedworth Borough Council & Warwickshire County Council -v- Thomas Corcoran & Others
High Court Order dated 22 March 2019
Claim number: QB-2019-000616

Schedule of sites served by John Andrew Ingram

Site number & description		Date & time served	Copies served
41	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	10/04/2019 10:40	7
42	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton	10/04/2019 11:15	5
126	Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	10/04/2019 12:10	3
3	Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton	10/04/2019 12:27	1
138	Manor Park Community School, Beaumont Road, Nuneaton	10/04/2019 13:00	5
125	Etone College, Leicester Road, Nuneaton, CV11 6AA	10/04/2019 13:20	2
129	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	10/04/2019 13:30	2
86	Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton	10/04/2019 15:05	14
16	Recreation Ground at Easyboro Way, Nuneaton	10/04/2019 15:15	1
81	Land lying to the east of Eastboro Way, Nuneaton	10/04/2019 15:55	2
6	Joinery works and adjacent premises fronting Regent Street, Nuneaton	10/04/2019 16:23	1
136	Land on the South West Side of Magyer Crescent, Nuneaton	10/04/2019 16:38	2
17	Land on south side of Lutterworth Road, Nuneaton	10/04/2019 17:05	4
18	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 of croft road		
102	St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX	10/04/2019 17:40	3
20	Land at Recreation Ground, Tomkinson Road, Nuneaton	10/04/2019 17:50	2
19	Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton	11/04/2019 07:54	2
135	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	11/04/2019 08:28	3
21	Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road	11/04/2019 08:57	7
76	Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chilvers Coton	11/04/2019 09:17	1
15	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	11/04/2019 09:51	3
112	Land on the south side of Skye Close, Nuneaton	11/04/2019 10:24	4
128	Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Radnor Drive, Nuneaton	11/04/2019 10:42	1
88	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH)	11/04/2019 11:25	3
34	Hekley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	11/04/2019 12:03	4
37	Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	11/04/2019 12:34	2
93	Wheelwright Lane Primary School, Ash Green, Coventry	11/04/2019 12:47	1
25		11/04/2019 12:55	1

132	Exhall Grange School and Science College, Wheelwright Lane, Bedworth	12/04/2019	09:00	4	1
33	Land on the West side of Blackberry Lane, Bedworth	12/04/2019	09:25	1	1
99	Land on the South Side of Hayes Lane, Exhall, Bedworth	12/04/2019	09:45	1	1
95	Keresley Newland Primary Academy and Keresley Newland School, , Grove Lane, Keresley, Coventry, (CV7 8JZ)	12/04/2019	10:05	2	1
35	Land lying to the North East of Howat Road, Bedworth	12/04/2019	10:15	2	1
60	Land on the north and south sides of Newtown Road, Nuneaton	12/04/2019	11:35	3	1
96	Land to the South of Smorral Lane, Goodyears End, Bedworth and Land lying to the South of Smorral Lane Bedworth	12/04/2019	12:00	4	1
46	Land and Buildings at Market End Farm and Orchard Farm, Smorral Lane	12/04/2019	12:30	2	1
47	Land at Smorral Lane, Bedworth	12/04/2019	12:45	1	1
131	Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP	12/04/2019	12:53	1	1
45	Land on the south side of Cardigan Road, Bedworth	12/04/2019	13:03	1	1
89	Race Leys Infant School, Bedworth	12/04/2019	13:21	1	1
23	Land on the north side of Marston Lane, Bedworth	12/04/2019	13:30	1	1
22	Land on the south side of Marston Lane, Nuneaton	12/04/2019	13:48	1	1
134	Race Leys Middle School, Barton Road, Bedworth, CV12 8HG	12/04/2019	14:00	1	1
98	St Francis Roman Catholic School, Nicholas Street, Bedworth	12/04/2019	14:14	1	1
57	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	12/04/2019	14:23	1	1
54	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	12/04/2019	14:32	2	1
56	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	12/04/2019	14:38	2	1
	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,				
24	Bedworth & Zion Chaple, High Street Bedworth	12/04/2019	15:05	6	1
25	Park Road (Car Park) - land on the east side of Park Road, Bedworth	12/04/2019	15:25	1	1
51	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	12/04/2019	15:30	2	1
93	Land and buildings on the South side of Derwent Road, Bedworth	12/04/2019	16:01	3	1
58	Land at Arbury Avenue, Bedworth	12/04/2019	16:12	1	1
	Land on the North side of Bulkington Road and land on the South side of Johnson Road/Alex Wilson Centre, 34 Nuneaton Road,				
53	Bedworth (CV12 8AL) and land lying to the west of Wootton Street and land at Elizabeth Centre, Johnson Road	12/04/2019	16:45	3	1
101	St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9DA)	12/04/2019	16:55	1	1
87	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	12/04/2019	17:15	2	1
91	All Saints Bedworth C of E Primary School and Nursery, Bedworth	12/04/2019	17:32	1	1
28	Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	12/04/2019	17:47	2	1
100	St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF)	12/04/2019	18:00	1	1
27	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	12/04/2019	18:10	1	1
26	Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barnacle Lane, Bulkington	12/04/2019	18:15	2	1
92	Land on the West side of Weston Lane, Bulkington, Bedworth	12/04/2019	18:30	1	1
85	Land lying to the West of Blackhorse Road, Bedworth	12/04/2019	18:30	1	1
90	Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)	12/04/2019	18:50	1	1
52	Land lying to the West side of Blackhorse Road, Bedworth	12/04/2019	19:59	1	1

Total sites served

63

Total copies served

148

IN THE HIGH COURT OF JUSTICE

QB-2019-000616

QUEENS BENICH DIVISION

B E T W E E N:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) MR THOMAS CORCORAN AND 53 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

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

Defendants

"JAI 2"

This is the exhibit marked "JAI 2"

referred to in the Witness Statement of John Andrew Ingram

Statement of Truth

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

Signed:


John Andrew Ingram

Dated: 22nd May 2019

Date: 8th April 2019

**Re: Nuneaton and Bedworth Borough Council & Warwickshire County Council v
Thomas Corcoran & Others**
High Court Injunction against Unauthorised Encampments
Claim NO: QB-2019-000616

Enclosed is a copy of the High Court Injunction Order dated 22nd March 2019 and Schedules 1, 2 and 3 of the Order as made by HHJ Timothy Straker QC. This Order protects against unauthorised encampments by the named persons (detailed in Schedule 1 of the Application Form) and persons unknown.

This site is amongst those sites subject to the Injunction Order and is referred to the list and maps attached at Schedule 3.

The implications of the Order are:-

- **You must not set up an encampment on this land or any other land to which the Order applies** as identified in Schedule 3, without the written permission from the Council or the Secretary of State;
- **You must not enter and/or occupy any part of this land and any other land** referred to in Schedule 3 **for residential purposes**, temporary or otherwise
- **You must not bring onto the land or station on the land any caravans/mobile homes** etc except in compliance with parking orders regulating the use of car parks or with express permission from the land owner;
- **You must not deposit or cause to be deposited, controlled waste in or on the land** unless in accordance with a licence or permit for the disposal of such waste.

A Power of Arrest is attached to the above terms. Any person caught breaching the terms of the Order may be arrested and brought before the Court.

Effect of Order

It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of the Order.

The information forming part of this injunction application can be viewed online at www.nuneatonandbedworth.gov.uk/injunction.

Alternatively a copy of the information is available for inspection at Nuneaton and Bedworth Town Hall, Coton Road, Nuneaton, CV11 5AA. Opening hours of our offices and telephone service are 9:00am until 5:00pm (Monday to Friday).

IN THE HIGH COURT OF JUSTICE

Claim Number: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF S222 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 4 OF THE ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2-10 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 Pat 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:

2. 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.
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 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.
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 the express permission from the owner of the land.

6. 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.

Persons Unknown (the Fifty-Fourth Defendant) are forbidden from:

7. 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 an waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.
11. There be a power of arrest attached to prohibitions 2-10 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 Claimant to vary or discharge this order (or so much of it as affects that person)
16. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

17. A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or his instructions or with his encouragement.

18. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by 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 WG08 Royal Courts of Justice, Strand, London, WC2A 2LL (020 7947 6010).

SCHEDULE 1 – LIST OF DEFENDANTS

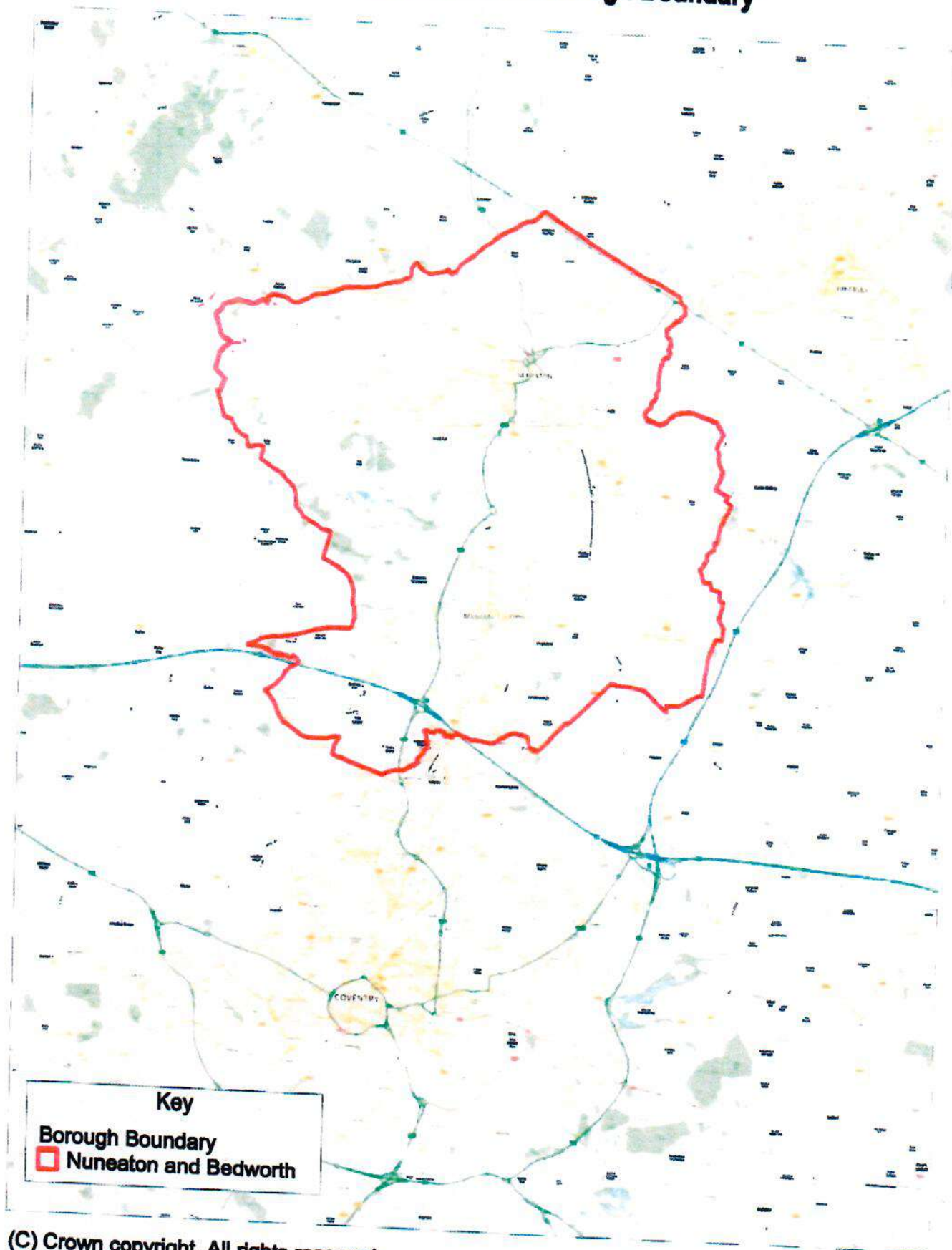
List of Defendants and their addresses

- (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 McDONAUGH
- (47) EDDIE (AKA EDWARD) WARD
- (48) CHRISTOPHER McDONAUGH
- (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	✓ or ✗	Postcode	Land Owner	Title Number
1B		Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS)	✗		NBBC	WK447689
2B		Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground) (Pool Bank St)	✓	CV11 6PZ	NBBC	WK448289
3B		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/ WK240784/ WK236363
4B		Land being car park on the south west side of Corporation Street, Nuneaton (aka Upper Abbey Street Car Park)	✗	CV11 5DG	NBBC	WK448598
5B		Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street Car Park 1 and 2)	✗	CV11 5QE	NBBC	WK448585/ WK178904
6B		Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	✗	CV11 4BW	Private	WK398438
7B		Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park)	✗	CV11 5DB	NBBC	WK450184
8B		Riversley Park Clinic, Colton Road, Nuneaton, (CV11 5TY) (aka Orchard Street Car Park)	✗	CV11 4BS	Private	WK388584
9B		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)	✗	CV11 5NE	NBBC	WK251517
10B		Land at Church Street, Nuneaton (aka Church Street Car Park)	✗	CV11 4AS	NBBC	WK448978
11B		Land and buildings lying to the East of Colton Road (aka Town Hall Car Park)	✗	CV11 5AA	NBBC	WK388582
12B		Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)	✗	CV11 4AL	NBBC	WK428942
13B		Land at Colton Road, Nuneaton (aka Riverside Car Park)	✗	CV11 5AA	NBBC	WK450286
14B		Meadow Court, Meadow Street, Nuneaton, (CV11 5JF) (aka Meadow Street Car Park)	✗	CV11 5JF	NBBC	WK448678
15B		Land to the south side of Bermuda Lane and lying to the east and west of Coventry Road, (Chivers Colony) 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
16C		Recreation Ground at Easyford Way, Nuneaton (aka Albionborough Recreational Ground)	✓	CV11 4PY	NBBC	WK448338
17C		Land on south side of Luttrell Road, Nuneaton (aka Paula Land)	✓	CV11 6QA	NBBC	WK448027
18B		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 ofcroft road (aka Jubilee Sports Centre)	✓	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
19B		Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton (aka Marsdale Drive)	✓		NBBC	WK342561/ WK355952
20B		Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC	WK447355
21B		Land at Whitlifford Park, Haundwood Road Nuneaton, land lying to the north east of Haundwood Road (aka Whitlifford Park)	✓	CV10 8PY	NBBC	WK130458/ WK447033
22E		Land on the south side of Marston Lane, Nuneaton (aka Bailey Park)	✓	CV12 8DR	NBBC	WK448160
23E		Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓		NBBC	WK448256
24E		Spitalfields 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the north-west side of Rye Place Ringway, Bedworth & Zion Church, High Street Bedworth	✗	CV12 8NF	NBBC	WK448878/ WK248825/ WK448801
25E		Park Road (Car Park) - land on the east side of Park Road, Bedworth	✗	CV12 8LH	NBBC	WK448511
26F		Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; and at Barnacle Lane, Bulkington, Bedworth	✓		NBBC	WK448811/ WK448824(part)

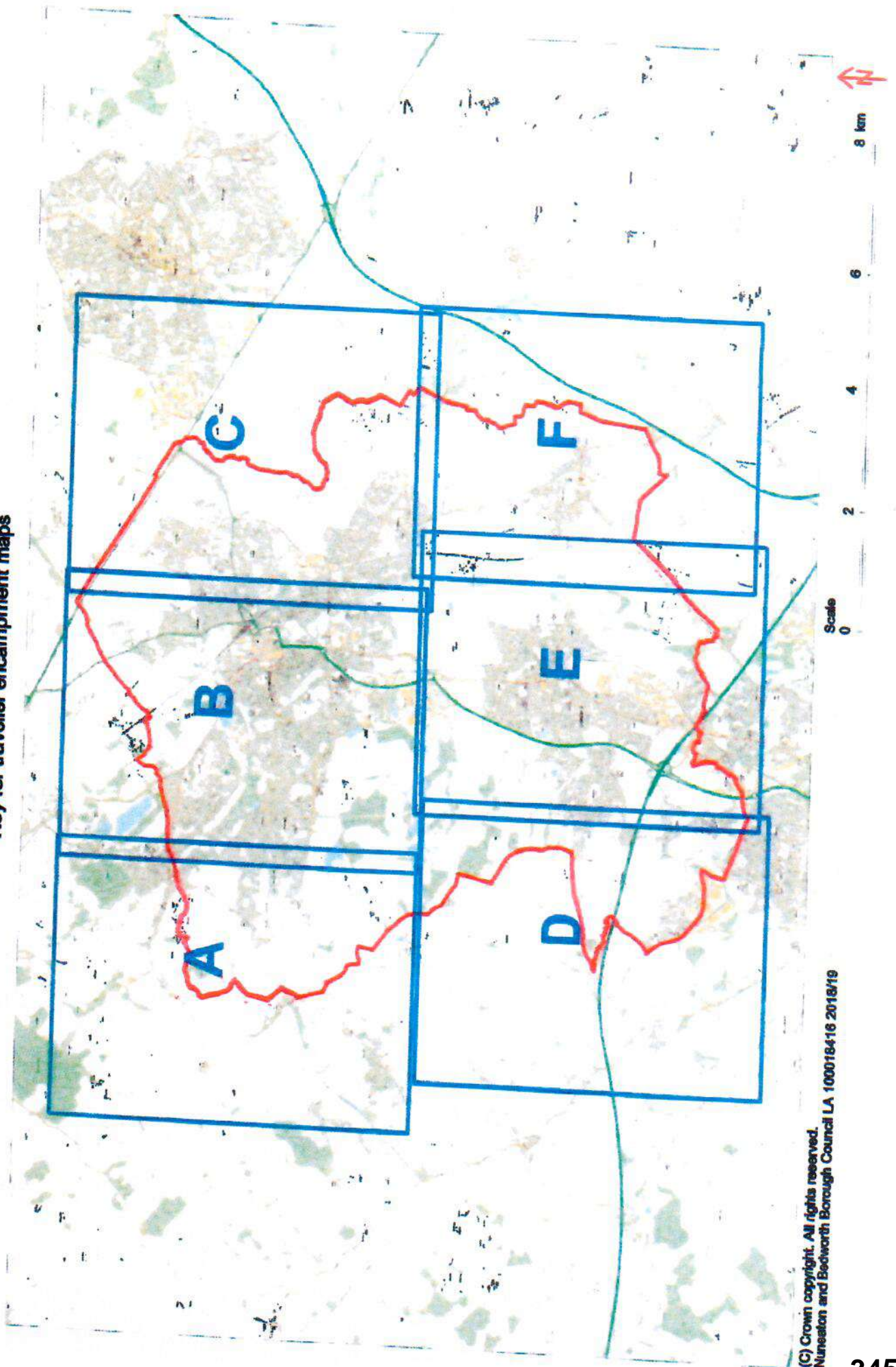
27 F	Land at Brewer Road, Bukington, Bedford and land at Eustace Road, Bukington, Bedford	✓	CV12 9RF	NBBC	WK448510/ WK448500
28 F	Bukington Recreation Ground, Bedford Road, Bukington, Bedford, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK448949
29 B	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK436320
30 B	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Rameaden 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	WK373678/ WK448013
32 B	Land on the south side of Willow Road, Nuneaton	✓		NBBC	WK447731
33 D	Land on the West side of Blackberry Lane, Bedford	✓		NBBC	WK137139
34 E	Hedley Recreational Ground - land lying to the north of School Lane, Eddall, Coventry	✓	CV7 9EX	NBBC	WK460050
35 D	Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedford	✓	CV7 9NG	NBBC	WK124031
36 E	Land lying to the North West of Rowley's Green Lane, Eddall, Coventry (aka Silverstone Drive)	✓		NBBC	WK338223
37 E	St. Giles Recreational Ground - Land on the South side of Vicarage Lane, Eddall, Bedford and land lying to the West of St Giles Road, Eddall	✓			
38 B	Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Marl)	✓	CV7 9GZ	NBBC	WK143991/ WK154857
39 A	Land south-east of Hickman Road, Gailley Common, Nuneaton (aka Chaucer Drive)	✓	CV10 9TD	NBBC	WK359453
	Nuneaton & North Warwickshire Group Riding for Disabled, Valley Road, Gailley Common (CV10 9NUJ) land at Campbell Close, Nuneaton and land at Gailley Common, Nuneaton (CV10 9NUJ) aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre)	✓	CV10 9SD	NBBC	WK339730
40 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, Whitford and land lying to the West of Bucks Hill (aka Freeland Rise)	✓	CV10 9PZ	NBBC	WK447381/ WK439120/ WK244038/ WK239146
41 B/A	Land on the east and west side of Sherbourne Avenue, Whitford, Nuneaton (aka Farnham Drive/Poplar Tree Farm EA)	✓	CV10 9QF	NBBC	WK319148/ WK326554
42 B/A	Land on Gailley Common, Nuneaton; land at Gailley Common Nuneaton and land on the south side of Plough Hill Road, Stockingford (aka North Field)	✓		NBBC	WK319145
43 A	Land on the south side of Sherbourne Avenue, Nuneaton	✓	CV10 9PZ	NBBC	WK238447/ WK238145/ WK324522
44 B	Land on the south side of Cardigan Road, Bedford (aka Anderson Road POS)	✓	CV10 9JH	NBBC	WK234444
45 D	Land on the south side of Cardigan Road, Bedford (aka Anderson Road POS)	✓	CV12 0HD	NBBC	WK261821
46 E	Land and buildings at Marl at End Farm and Ordinal Farm, Smorrell Lane	✓	CV12 0GE	Private	WK380708
47 E	Newgate Recreational Ground - Land at Smorrell Lane, Bedford	✓	CV12 0JP	NBBC	WK449987
48 A	Land on the North side of Anley Road, Stockingford (aka Grove Farm/Thornons Way)	✓	CV10 8NN	NBBC	WK32497
49 A	Kingwood Road Recreational Ground - Land on the North side of Anley Road, Stockingford	✓	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, Bedford	✓	CV12 8NW	NBBC	WK448032
52 E	Land lying to the West side of Blackhorse Road, Bedford (aka Ironbridge Way)	✓	CV6 6TE	Private	WK394575
	Land on the North side of Bukington Road and land on the South side of Johnson Road/Alex Wilson Centre, 34 Nuneaton Road, Bedford (CV12 8AL) and land lying to the west of Woodton Street and land at Elizabeth Centre, Johnson Road	✓			
53 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedford	✓	CV12 9BH	NBBC	WK169700/ WK448169/ WK250892/ WK448429
54 E	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedford	✓	CV12 8JT	NBBC	WK448032
55 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedford	✓	CV12 8NN	NBBC	WK448032
56 E	Bedworth Railway Station (Car Park) - Land on the north side of Bulldington Road, Bedford	✓	CV12 8JT	NBBC	WK448032
57 E	Land at Artbury Avenue, Bedford (aka Artbury Road POS)	✓	CV12 8JG	NBBC	WK386034
58 E	Collycroft Recreational Ground - Land lying to the east of Amos Jacques Road, Collycroft, Bedford and land to the west of Nuneaton Road/Alex Wilson Centre 34 Nuneaton Road Bedford and land to the west of Nuneaton Road	✓		NBBC	WK448598
59 E	Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road)	✓			
60 E	Land lying to the north of Buttermere Avenue, Nuneaton	✓	CV12 0AL	NBBC	WK256888/ WK460024/ WK448169/ WK317827
61 C		✓	CV11 8EP	NBBC	WK448948
		✓		NBBC	WK210886

62 C	Land at Horseon Grange, Nuneaton and land lying south and west of Cantome Drive, Nuneaton	✓		NBBC	WK338798/ WK344807
63 C	Land lying to the south of Hindley Road, Nuneaton and land to the west of Clovely Way	✓	CV11 6YB	NBBC	WK447654/ WK319282
64 C	Recreation Ground, The Long Shool, Nuneaton, (CV11 6JH)	✓	CV11 6JH	NBBC	WK448886
65 C	Land at Horseon Grange and land to the south of Hindley Road, Nuneaton (aka Tiverton Drive/Leasbrook Way)	✓	CV11 6YL	NBBC	WK338798/ 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/ WK308853
67 B	Land on the south side of Church Lane, Nuneaton (Clever Gardens/Sandon Fields)	✓	CV10 0HG	NBBC	WK448858
68 B	Land on the north side of Brookdale Road, Nuneaton and land on the North side of Ryde Avenue, Nuneaton (aka Cornallion Walk)	✓	CV10 0BN	NBBC	WK448098/ WK448091
69 B	Land at Bradstone Road, Nuneaton	✓		NBBC	WK450488
70 B	Land on the north side of Donmillhorne Avenue, Nuneaton (aka Caldwell Grange)	✓		NBBC	WK452385
71 B	Land on the south side of Avenue Road, Nuneaton (aka Galla Fields)	✓		NBBC	WK452278
72 B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground)	✓		NBBC	WK448885
73 B	Land on the north side of Donmillhorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	✓		NBBC	WK448842/ WK448819
74 B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton	✓	CV11 5PQ	NBBC	WK447475
75 B	Land at Donmillhorne Avenue, Nuneaton; land lying to the east of Ravelside 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/ WK449488/ WK448734
76 B	Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chivers Colon	✓	CV10 7BX	NBBC	WK448537/ WK344872
77 B	Riversley Park, Cotton Road, Nuneaton	✓	CV11 5TY	NBBC	WK450208/ WK450173
78 B	Land at Sorrel Road, Nuneaton	✓	CV10 7AW	NBBC	WK450035
79 B	Riversley Park (Car Park) - Riversley Park, Cotton Road, Nuneaton	✓	CV11 5TX	NBBC	WK450208/ WK450173
80 B	Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park)	✓	CV11 4LX	NBBC	WK448885
81 C	Crownhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 8XA	NBBC	WK370815
82 B	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	✓	CV11 4PW	NBBC	WK310057
83 E	Land at Acadia Crescent, Bedworth	✓		NBBC	WK448428
84 B	Land at Durra Close, Nuneaton	✓		NBBC	WK452330
85 E	Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry)	✓		Private	WK394575
86 C	Atleborough Fields Farm, Nuneaton and Land at Slingsby Close, Atleborough Fields Industrial Estate, Nuneaton	✓		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	WK453626
89 E	Race Lays Infant School, Bedworth	✓	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	✓	CV12 9HP	WCC	Unregistered
92 F	Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth	✓	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	WK25063
94 E	Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth	✓	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 Smorral Lane, Goodyers End, Bedworth and Land lying to the South of Smorral 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	✓	CV12 8JN	Private	WK262596
	Land lying to the North of Rye Place Ringway, Bedworth	✓		Private	WK476476

99 E	Land on the East Side of Nicholas Street, Bedworth	✓	CV7 9NS	WCC	WK171388
100 F	St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV12 9FF	WCC	WK171647
	St James Church of England School, Barbridge Road, Buildington, Bedworth (CV12 9FF)			Private	WK461720
	Playing fields at St James Church of England Junior School, Barbridge Road, Buildington, Bedworth, CV12 9FF			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
	Abbey High School, Greenmoor Road, Nuneaton			Private	WK233418
103 B	Abbey C of E Infant School, Nuneaton	✗	CV11 5EL	WCC	Unregistered
104 B	All Saints C of E Primary School & Nursery, Knibley Crescent, Nuneaton (CV10 7AT)	✗	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 Colon Community Infant School, Frank Street, Nuneaton (CV11 6RB)	✗	CV11 6RB	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	✗	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	✗	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)	✗	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 Joseph's RC First School at Cotton Road, Nuneaton	✗	CV11 5TY	Private	WK228511
	Our Lady of the Angels Infant School and St Joseph's RC First School, Cotton Road, Nuneaton, CV11 5TY			Private	WK477543
116 A	Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Anesley Road, Nuneaton	✓	CV10 8NL	Private	WK470637
117 B	Land on the North Side of Anesley Road, Nuneaton			Private	WK189736
118 B	Queens County Junior and Infant School, Benliff Road, Nuneaton, CV11 5LR			Private	WK471379
119 B	St Pauls C of E Primary School, Nuneaton	✗	CV10 8NH	Unregistered	
	Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	✗	CV10 0DX	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	✗	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	✗	CV11 6HJ	WCC	WK473130
	Land on the East Side of Windemere Avenue, Nuneaton			Private	WK313856
	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	Elton College, Leicestershire 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, Rast	✓	CV10 7PD	WCC	WK175243/WK425489
129 C	North Warwickshire and Hinckley College, Hindley Road, Nuneaton, CV11 6BH	✓	CV11 6BH	Private	WK428695

130 B	King Edward VI College, King Edward Road, Nuneston, CV11 4BE	✓	CV11 4BE	Private	WK457942/WK457832
131 E	Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP	✗	CV12 0DP	WCC	WK426282
132 D	Edhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
	Edhall Grange Special School, Wheelwright Lane, Coventry			Private	WK440475
	Land at Edhall Grange School, Wheelwright Lane, Coventry, CV7 8HP	✓	CV7 8HP	Private	WK450903
133 E	Quest Academy, North Side of Griff Lane, Nuneston	✓	CV10 7SD	WCC	WK365844
134 E	Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneston	✗	CV12 8AG	WCC	WK240628
	Race Leys Middle School, Barton Road, Bedworth, CV12 8HG		CV12 8HG	Private	WK465841
136	B Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneston			WCC	WK390085
	Stockingford Junior And Infant School, Grove Road, Nuneston (CV10 8JY)	✓	CV10 8JY	WCC	WK42667
	Whiteborne Infant School, aka Land on the South West Side of Magyer Crescent Nuneston	✗	CV11 4SQ	WCC	WK23140
136 C	Atleborough Mills, Atleborough Road, Nuneston (aka Holman Way)	✗		Private	WK256088
137 B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneston	✗	CV11 5SS	Private	WK430022
138 B	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneston	✓	CV10 7SD	Private	WK447390
139 B	Halfords - land and buildings on the south side of Newtown Road, Nuneston	✗	CV11 5UT	Private	WK390614
140 B	Bermuda Road Community Centre, Bermuda Road, Nuneston (aka Bermuda Phoenix Centre)	✓	CV10 7HU	Private	WK474729
141 B					

Key for traveller encampment maps



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A

Northwest Nuneaton



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100018416 2018/19

Scale
0 250 500 750 1000 m



B

North of Nuneaton

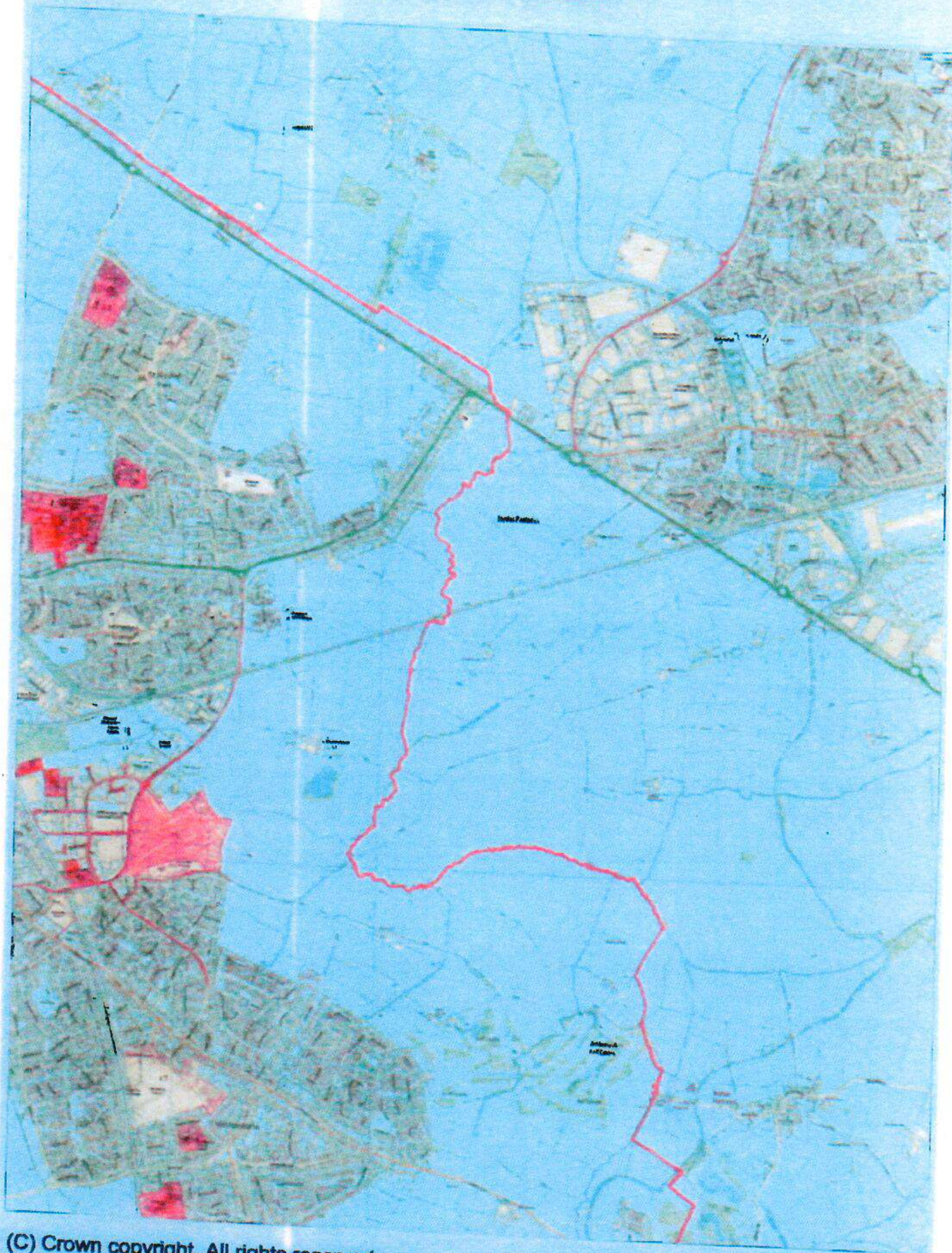


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100018416 2018/19

Scale
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C

Northeast Nuneaton



D

Southwest Bedworth



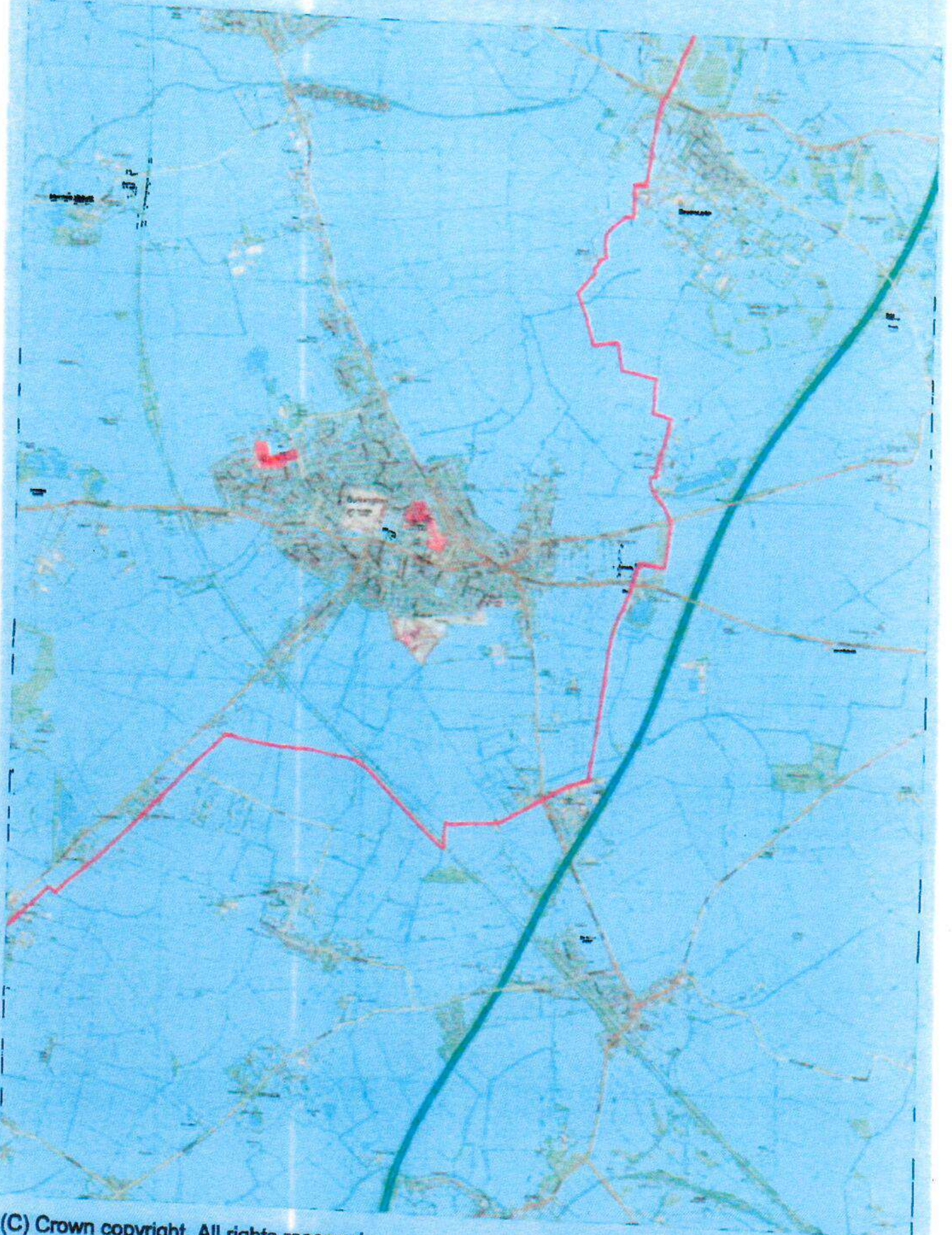
E

South of Bedworth



F

Southeast Bedworth



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100018416 2018/19

Scale
0 250 500 750 1000 m

351

IN THE HIGH COURT OF JUSTICE

QB-2019-000616

QUEENS BENICH DIVISION

B E T W E E N:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

(1) MR THOMAS CORCORAN AND 53 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

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

Defendants

"JA13"

This is the exhibit marked "JA13"

referred to in the Witness Statement of John Andrew Ingram

Statement of Truth

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

Signed:


John Andrew Ingram

Dated: 22nd May 2019











Claimant
Harry Michael Mellor
Second
23rd May 2019
"HMM1-HMM3"

IN THE HIGH COURT OF JUSTICE

QB-2019-000616

QUEENS BENICH DIVISION

B E T W E E N:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL
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THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

SECOND WITNESS STATEMENT OF HARRY MICHAEL MELLOR

I Harry Michael Mellor, of 212 Strand, London WC2R 1AP, Process Server for the purpose of service instructed by Nuneaton and Bedworth Borough Council of Town Hall, Coton Road, Nuneaton CV11 5AA, the Claimants, will say as follows: -

1. THAT in accordance with the Order of Timothy Straker QC dated 22nd March 2019, between 10.00hrs on Wednesday 10th April 2019 and 19.59 hrs on Friday 12th April 2019 effect service of 166 copies on 78 of the pieces of Land numbered 1 to 141 on schedule 3 attached to the Order by inserting a complete copy of the Order of Timothy Straker QC dated 22nd March 2019; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown and a Notice from Nuneaton and Bedworth Borough Council, in a sealed transparent waterproof envelope and by affixing all 166 copies in prominent positions at each entrance to the Land on each of the 78 sites served by me. All copies that were secured, were affixed with green duct tape so they would come to the attention of anyone attending at or entering the land.

2. A schedule detailing the exact site number, number of Orders served; site name and date of time served is now produced and shown to me marked "HMM1"
3. True copies of the Order of the Order of Timothy Straker QC dated 22nd March 2019; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown and a Notice from Nuneaton and Bedworth Borough Council, so served by me are now shown to me marked "HMM2".
4. Copies of photographs taken by me by, only way of example of 5 out of 148 serves performed are now produced and shown to me in a bundle marked "HMM3"

Statement of Truth

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

Signed: 

Harry Michael Mellor

Dated: 23rd May 2019

QUEENS BENICH DIVISION

B E T W E E N:

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

Claimants

-and-

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

Defendants

"HMM1"

This is the exhibit marked "HMM1"

referred to in the Witness Statement of Harry Michael Mellor

Statement of Truth

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

Signed: 

Harry Michael Mellor

Dated: 23rd May 2019

Nuneaton and Bedworth Borough Council & Warwickshire County Council -v- Thomas Corcoran & Others
High Court Order dated 22 March 2019
Claim number: QB-2019-0000616

Schedule of sites served by Harry Michael Mellor

Site number & description	Date & time served	Copies served
133 North Side of Griff Lane, Nuneaton	10/04/2019 10:00	3 1
59 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		
83 Land at Acacia Crescent, Bedworth	10/04/2019 10:25	3 1
94 Land lying to the East of Coventry Road, Bedworth	10/04/2019 10:45	2 1
36 Land lying to the North West of Rowley's Green Lane, Exhall, Coventry	10/04/2019 11:00	1 1
5 Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ)	10/04/2019 11:20	3 1
140 Halfords - land and buildings on the south side of Newtown Road, Nuneaton	10/04/2019 11:45	2 1
9 L & B on the east side of Broad Street, the north side of Queen's Road and the south west side of Abbey Street	10/04/2019 12:10	1 1
1 Land on the north side of Corporation Street, Nuneaton	10/04/2019 12:25	2 1
103 Abbey Cof E Infant School, Nuneaton	10/04/2019 12:45	1 1
107 Land at Judkins Quarry Tuttle Hill, Nuneaton	10/04/2019 13:00	1 1
119 Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	10/04/2019 13:20	2 1
10 Land at Church Street, Nuneaton	10/04/2019 13:40	1 1
64 Recreation Ground, The Long Shoot, Nuneaton, (CV11 6JH)	10/04/2019 14:10	3 1
61 Land lying to the north of Buttermere Avenue, Nuneaton	10/04/2019 14:40	1 1
66 Land on the east side of Changebrook Close and land on the west and east side of Pallett Drive, Nuneaton	10/04/2019 15:10	1 1
111 Land lying to the East of Higham Lane, Nuneaton	10/04/2019 15:45	5 1
121 Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 6HJ	10/04/2019 16:10	1 1
62 Land at Horseton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	10/04/2019 16:45	1 1
63 Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	10/04/2019 17:00	6 1
65 Land at Horseton Grange and land to the south of Hinckley Road, Nuneaton	10/04/2019 17:30	2 1
82 Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	10/04/2019 18:00	2 1
137 Attleborough Mills, Attleborough Road, Nuneaton	10/04/2019 18:30	1 1
71 Land on the south side of Avenue Road, Nuneaton	10/04/2019 18:50	1 1
84 Land at Dunns Close, Nuneaton	11/04/2019 07:00	2 1
124 Land on the North Side of Avenue Road, Nuneaton	11/04/2019 07:20	1 1
72 Land on the north side of Avenue Road, Nuneaton	11/04/2019 08:00	1 1
80 Land on the north side of Avenue Road, Nuneaton	11/04/2019 08:30	3 1
703 Riversley Park, Coton Road, Nuneaton	11/04/2019 09:10	3 1
751 Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton	11/04/2019 10:00	6 1
	11/04/2019 10:10	1 1

8	Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)	11/04/2019	10:20	1	1
115	School at Coton Road, Nuneaton	11/04/2019	10:30	1	1
130	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	11/04/2019	10:45	2	1
40	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)	11/04/2019	11:05	1	1
110	Galley Common Infant School, Nuneaton	12/04/2019	07:00	1	1
105	Land to the South of Tuttle Hill, Camp Hill, Nuneaton	12/04/2019	07:20	1	1
12	Land at Vicarage Street, Nuneaton	12/04/2019	08:00	2	1
4	Land being car park on the south west side of Corporation Street, Nuneaton	12/04/2019	08:20	1	1
13	Land at Coton Road, Nuneaton	12/04/2019	08:40	1	1
11	Land and buildings lying to the East of Coton Road	12/04/2019	09:00	1	1
39	Land south-east of Hickman Road, Galley Common, Nuneaton	12/04/2019	09:45	4	1
43	Land on Galley Common, Nuneaton; land at Galley Common and Land on the south side of Plough Hill Road, Stockingford	12/04/2019	10:25	5	1
116	Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton	12/04/2019	10:35	1	1
48	Land on the North side of Ansley Road, Stockingford	12/04/2019	10:50	3	1
49	Kingswood Road Rec - Land on the North side of Ansley Road, Stockingford	12/04/2019	11:05	1	1
29	Land on the south west side of Queen Elizabeth Road, Nuneaton	12/04/2019	11:15	1	1
38	Land on the east side of Bucks Hill, Nuneaton.	12/04/2019	11:40	3	1
44	Land on the south side of Sherbourne Avenue, Nuneaton	12/04/2019	11:50	1	1
118	St Pauls C of E Primary School, Nuneaton	12/04/2019	12:00	1	1
114	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	12/04/2019	12:10	2	1
32	Land on the south side of Willow Road, Nuneaton	12/04/2019	12:30	3	1
30	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden Avenue, Nuneaton	12/04/2019	13:10	6	1
31	L & B on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton	12/04/2019	14:30	6	1
14	Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)	12/04/2019	15:00	1	1
2	Recreation ground lying to the north of Queens Road, Nuneaton.	12/04/2019	15:15	3	1
7	Land on the west and east sides of Vicarage Street, Nuneaton	12/04/2019	15:40	3	1
68	Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue, Nuneaton	12/04/2019	16:00	3	1
67	Land on the south side of Church Lane, Nuneaton	12/04/2019	16:15	5	1
122	Land lying to the North East of Oakdene Crescent, Nuneaton	12/04/2019	16:35	1	1
120	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	12/04/2019	16:45	1	1
127	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	12/04/2019	16:55	1	1
70	Land on the north side of Donnithorne Avenue, Nuneaton	12/04/2019	17:10	3	1
123	Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP	12/04/2019	17:40	3	1
75	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	12/04/2019	18:30	7	1
104	All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)	12/04/2019	18:45	1	1
73	Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	12/04/2019	18:55	2	1
76	Land at Sorrell Road, Nuneaton	12/04/2019	19:15	2	1
62	Land at Bradestone Road, Nuneaton	12/04/2019	19:35	1	1

HMM phase 2

106	Land lying to the South of Gipsy Lane, Nuneaton	13/04/2019	15:30	1	1
139	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	13/04/2019	16:15	2	1
113	Middlemarch School, Nuneaton	13/04/2019	16:45	1	1
141	Bermuda Road Community Centre, Bermuda Road, Nuneaton	13/04/2019	17:20	3	1
50	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	13/04/2019	18:00	3	1
109	Land lying to the west of Northumberland Avenue, Nuneaton	13/04/2019	18:10	1	1
117	Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR	13/04/2019	18:20	1	1
74	Land on the south-west side of Marlborough Road, Nuneaton	13/04/2019	18:30	2	1
108	Chilvers Coton First School, Frank Street, Nuneaton (CV11 5RB)	13/04/2019	18:50	1	1
55	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	13/04/2019	19:10	2	1

Total sites served 78

Total copies served 166

B E T W E E N:

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

Claimants

-and-

- (1) MR THOMAS CORCORAN AND 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

"HMM2"

This is the exhibit marked "HMM2"

referred to in the Witness Statement of Harry Michael Mellor

Statement of Truth

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

Signed:


Harry Michael Mellor

Dated: 23rd May 2019

Date: 8th April 2019

**Re: Nuneaton and Bedworth Borough Council & Warwickshire County Council v
Thomas Corcoran & Others**
High Court Injunction against Unauthorised Encampments
Claim NO: QB-2019-000616

Enclosed is a copy of the High Court Injunction Order dated 22nd March 2019 and Schedules 1, 2 and 3 of the Order as made by HHJ Timothy Straker QC. This Order protects against unauthorised encampments by the named persons (detailed in Schedule 1 of the Application Form) and persons unknown.

This site is amongst those sites subject to the Injunction Order and is referred to the list and maps attached at Schedule 3.

The implications of the Order are:-

- **You must not set up an encampment on this land or any other land to which the Order applies** as identified in Schedule 3, without the written permission from the Council or the Secretary of State;
- **You must not enter and/or occupy any part of this land and any other land** referred to in Schedule 3 **for residential purposes**, temporary or otherwise
- **You must not bring onto the land or station on the land any caravans/mobile homes** etc except in compliance with parking orders regulating the use of car parks or with express permission from the land owner;
- **You must not deposit or cause to be deposited, controlled waste in or on the land** unless in accordance with a licence or permit for the disposal of such waste.

A Power of Arrest is attached to the above terms. Any person caught breaching the terms of the Order may be arrested and brought before the Court.

Effect of Order

It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of the Order.

The information forming part of this injunction application can be viewed online at www.nuneatonandbedworth.gov.uk/injunction.

Alternatively a copy of the information is available for inspection at Nuneaton and Bedworth Town Hall, Coton Road, Nuneaton, CV11 5AA. Opening hours of our offices and telephone service are 9:00am until 5:00pm (Monday to Friday).

IN THE HIGH COURT OF JUSTICE

Claim Number: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF S222 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 4 OF THE ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2-10 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 Pat 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:

2. 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.
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 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.
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 the express permission from the owner of the land.

6. 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.

Persons Unknown (the Fifty-Fourth Defendant) are forbidden from:

7. 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 an waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.
11. There be a power of arrest attached to prohibitions 2-10 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 Claimant to vary or discharge this order (or so much of it as affects that person)
16. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

17. A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or his instructions or with his encouragement.

18. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by 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 WG08 Royal Courts of Justice, Strand, London, WC2A 2LL (020 7947 6010).

SCHEDULE 1 – LIST OF DEFENDANTS

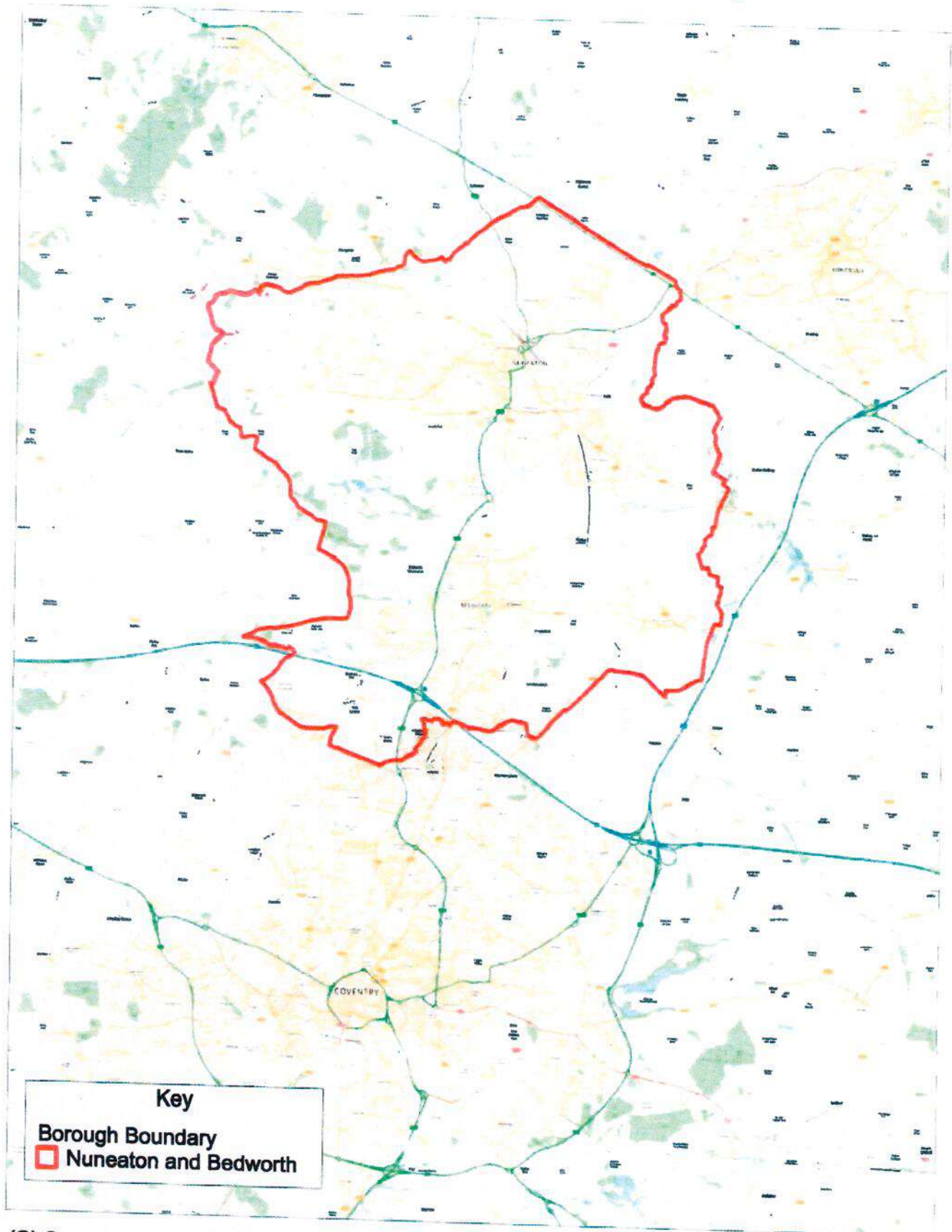
List of Defendants and their addresses

- (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 McDONAUGH
- (47) EDDIE (AKA EDWARD) WARD
- (48) CHRISTOPHER McDONAUGH
- (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	TH	Yes	POSTCODE	Land Owner	Title Number
1 B	Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS)	✓	✓		NBBC	WK447699
2 B	Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground/Pool Bank St)	✓	✓	CV11 6PZ	NBBC	WK446289
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)	✓	✓	CV11 5DG	NBBC	WK449599
5 B	Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street Car Park 1 and 2)	✓	✓	CV11 5QE	NBBC	WK449585/ WK178804
6 B	Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	✓	✓	CV11 4BW	Private	WK398436
7 B	Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park)	✓	✓	CV11 5DB	NBBC	WK450184
8 B	Riversley Park Clinic, Cotton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park)	✓	✓	CV11 4BS	Private	WK396594
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)	✓	✓	CV11 5NE	NBBC	WK251517
10 B	Land at Church Street, Nuneaton (aka Church Street Car Park)	✓	✓	CV11 4AS	NBBC	WK449976
11 B	Land and buildings lying to the East of Cotton Road (aka Town Hall Car Park)	✓	✓	CV11 5AA	NBBC	WK98582
12 B	Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)	✓	✓	CV11 4AL	NBBC	WK428842
13 B	Land at Cotton Road, Nuneaton (aka Riverside Car Park)	✓	✓	CV11 5AA	NBBC	WK450296
14 B	Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park)	✓	✓	CV11 5JF	NBBC	WK448678
15 B	Land to the south side of Bermuda Lane lying to the east and west of Coventry Road, Chivers Cotton (aka Bermuda Lane) and land to the south of 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/ WK345891
16 C	Recreation Ground at Easyboro Way, Nuneaton (aka Atterborough Recreational Ground)	✓	✓	CV11 4PY	NBBC	WK449338
17 C	Land on south side of Lutterworth Road, Nuneaton (aka Pauls Lane)	✓	✓	CV11 6QA	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 and Land lying to the south east side of Croft Road (aka Jubilee Sports Centre)	✓	✓	CV10 7EL	NBBC	WK46784/ 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, Haundwood Road Nuneaton, land lying to the north east of Haundwood 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	WK448160
23 E	Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓	✓		NBBC	WK448256
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	✓	✓	CV12 8NF	NBBC	WK448876/ WK246825/ WK448801
25 E	Park Road (Car Park) - land on the east side of Park Road, Bedworth	✓	✓	CV12 8LH	NBBC	WK448511
26 F	Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; and at Barnacle Lane, Bulkington, Bedworth	✓	✓		NBBC	WK448611/ WK448624(part)

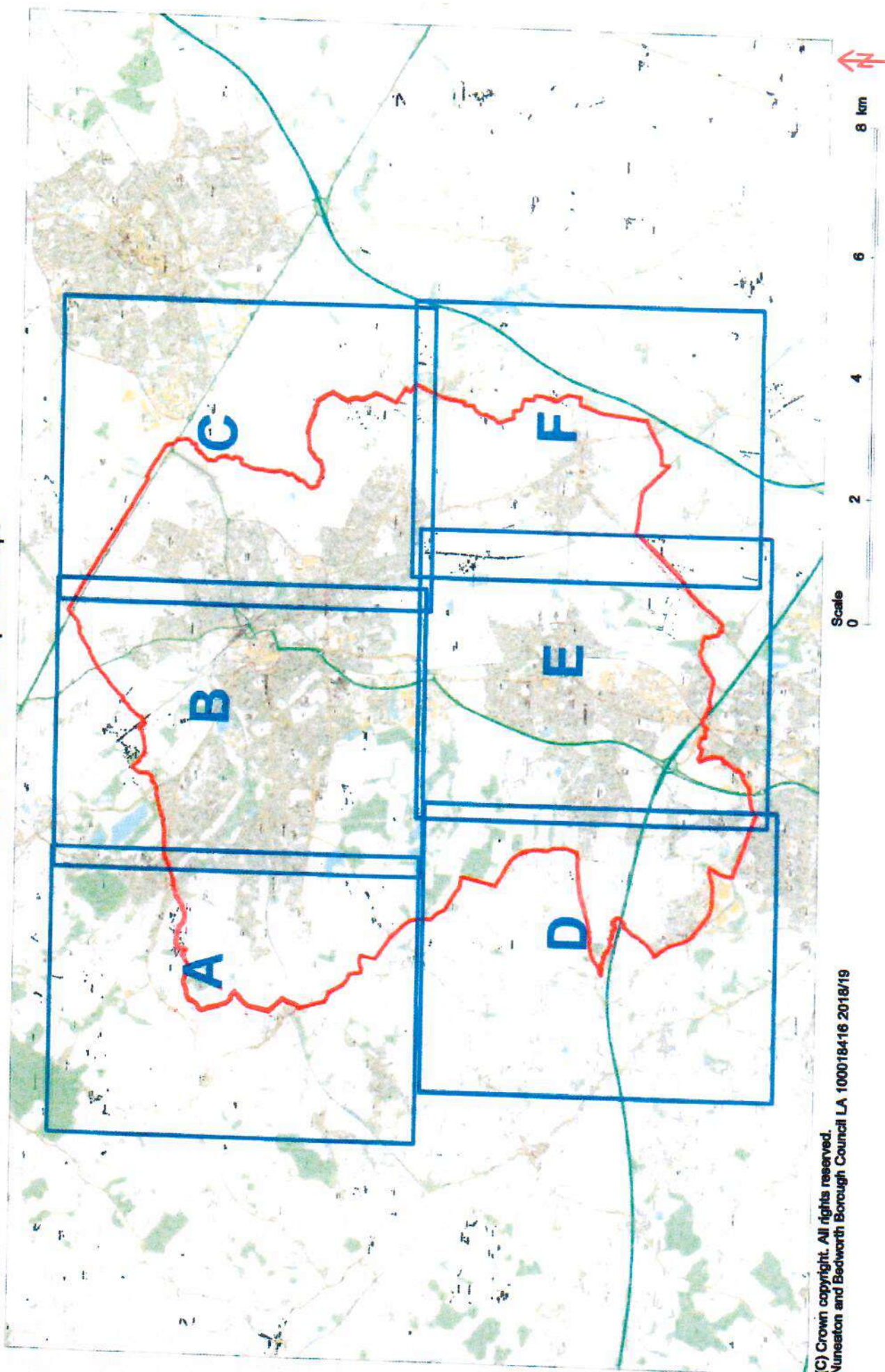
27 F	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	✓	CV12 9RF	NBBC	WK448510/ WK448500
28 F	Bulkington Recreational Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK448949
29 B	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK438320
30 B	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden Avenue, Nuneaton (aka Stubbs Pool)	✓	CV10 9DJ	NBBC	WK448187/ 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	WK373878/ 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	Hedley 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	✗	CV7 9GZ	NBBC	WK143881/ 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 Chalcoer Drive)	✓	CV10 9SD	NBBC	WK339730
40 A	Nuneaton & North Works Group Riding for Disabled, Valley Road, Galley Common (CV10 9NU) / land at Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NU) aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre)	✗	CV10 9PZ	NBBC	WK447381/ WK439120/ WK244038/ WK238145
41 B/A	Land on the south west side of Selby Way, land on the north side of Fensham 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	WK318148/ WK328554
42 B/A	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Fensham Drive/Poplar Tree Farm EA)	✓	-	NBBC	WK318145
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	✗	CV10 9JH	NBBC	WK234444
45 D	Land on the south side of Cardigan Road, Bedworth (aka Anderson Road POS)	✓	CV12 0HD	NBBC	WK281821
46 E	Land and Buildings at Mark of End Farm and Orchard Farm, Smorral Lane	✓	CV12 0GE	Private	WK380708
47 E	Newdigate Recreational Ground - Land at Smorral Lane, Bedworth	✓	CV12 0JP	NBBC	WK448987
48 A	Land on the North side of Anley Road, Stockingford (aka Grove Farm/Thornions Way)	✓	CV10 8NN	NBBC	WK32487
49 A	Kingswood Road Recreational Ground - Land on the North side of Anley Road, Stockingford	✗	CV10 9QG	NBBC	WK32487
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	WK448032
52 E	Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way)	✗	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 Woodton Street and land at Elizabeth Centre, Johnson Road	✓	CV12 9BH	NBBC	WK189700/ WK448189/ WK250982/ WK448429
54 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBC	WK448032
55 E	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✗	CV12 8NN	NBBC	WK448032
56 E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✗	CV12 8JT	NBBC	WK448032
57 E	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	✗	CV12 8JG	NBBC	WK386034
58 E	Land at Arbury Avenue, Bedworth (aka Arbury Road POS)	✗		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	WK258888/ WK480024/ WK448189/ WK317827
60 E	Land on the north and south side of Newtown Road, Nuneaton (aka Heath Road)	✗	CV12 0AL	NBBC	WK448946
61 C	Land lying to the north of Buttermere Avenue, Nuneaton	✓	CV11 6EP	NBBC	WK210986

62C	Land at Horseion Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	✓			NBBC	WK336798/ WK344807
63C	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	✓	CV11 6YB		NBBC	WK447654/ WK319282
64C	Recreation Ground, The Long Shool, Nuneaton, (CV11 6JH)	✓	CV11 6JH		NBBC	WK448898
65C	Land at Horseion Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Drive/Tavistock Way)	✓	CV11 6YL		NBBC	WK336798/ WK447654
66C	Land on the east side of Changebrook Close and land on the west and east side of Pallett Drive, Nuneaton	✓	-		NBBC	WK345480/ WK309853
67B	Land on the south side of Church Lane, Nuneaton (Cleeve Gardens/Sandon Fields)	✓	CV10 0HG		NBBC	WK448958
68B	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
69B	Land at Bradestone Road, Nuneaton	✓			NBBC	WK450499
70B	Land on the north side of Donmihorne Avenue, Nuneaton (aka Caldwell Grange)	✓			NBBC	WK452385
71B	Land on the south side of Avenue Road, Nuneaton (aka Gala Fields)	✓			NBBC	WK452278
72B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground)	✓			NBBC	WK448985
73B	Land on the north side of Donmihorne Avenue, Nuneaton and land at Knabley Crescent, Nuneaton	✓			NBBC	WK448942/ WK448919
74B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton	✓	CV11 5PQ		NBBC	WK447475
75B	Land at Donmihorne Avenue, Nuneaton; land lying to the east of Faveloe Drive, Nuneaton; and 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
76B	Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chilver's Colon	✓	CV10 7BX		NBBC	WK448537/ WK3444972
77B	Riversley Park, Colton Road, Nuneaton	✓	CV11 5TY		NBBC	WK450208/ WK450173
78B	Land at Sorrell Road, Nuneaton	✓	CV10 7AW		NBBC	WK450035
79B	Riversley Park (Car Park) - Riversley Park, Colton Road, Nuneaton	✓	CV11 5TX		NBBC	WK450208/ WK450173
80B	Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park)	✓	CV11 4LX		NBBC	WK448985
81C	Crownhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 6XA		NBBC	WK370915
82B	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	✓	CV11 4PW		NBBC	WK310067
83E	Land at Acadia Crescent, Bedworth	✓			NBBC	WK448428
84B	Land at Dunns Close, Nuneaton	✓			NBBC	WK452330
85E	Land lying to the West of Bleckhorse Road, Bedworth (aka Lymington Drive, Coventry)	✓			Private	WK394575
86C	Attleborough Fields Farm, Nuneaton and land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton	✓			WCC	WK271645/ WK455358
87E	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	✓	CV12 9EA		WCC	WK470015/ WK424958
88D/E	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH)	✓	CV7 9AH		Private	WK463626
89E	Race Leys Infant School, Bedworth	✓	CV12 8AD		WCC	Unregistered
90E	Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)	✓	CV12 0HP		WCC	WK424335
91E	All Saints Bedworth C of E Primary School and Nursery, Bedworth	✓	CV12 0HP		WCC	Unregistered
92F	Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth	✓	CV12 8RT		WCC	WK79471
93E	The Cannons C of E Primary School - aka Land and buildings on the South side of Derwent Road, Bedworth	✓	CV12 8RT		Private	WK25063
94E	Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth	✓	CV7 9FJ		WCC	WK33092
95D	Keresley Newland Primary Academy and Keresley Newland School, Grove Lane, Keresley, Coventry, (CV7 8JZ)	✓	CV7 8JZ		WCC	WK427632/ WK477207
96D	Newdigate Primary School and Nursery - aka Land lying to the South of Smorral Lane, Goodyears End, Bedworth and Land lying to the South of Smorral Lane Bedworth	✓	CV12 0HA		WCC	WK27604/ WK134659
97D/E	Wheehill Lane Primary School, Ash Green, Coventry	✓	CV7 9HN		WCC	WK425267
98E	St Francis Roman Catholic School, Nicholas Street, Bedworth	✓	CV12 8JN		Private	WK262596
-	Land lying to the North of Rye Piece Ringway, Bedworth	✓			Private	WK476476

99 E	Land on the East Side of Nicholas Street, Bedworth	✓	CV7 9NS	WCC	WK171388
100 F	St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV12 9PF	Private	WK171647
	St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF)				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	WK239418
103 B	Abbey C of E Infant School, Nuneaton	✗	CV11 5EL	WCC	Unregistered
104 B	All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)	✗	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 Grey Lane, Nuneaton	✓	CV11 4SE	WCC	WK170501
107 B	Land at Juddins Quarry Tuttle Hill, Nuneaton (aka Recycling Centre)	✓	CV10 0HU	WCC	WK393091
108 B	Chilvers Coton Community Infant School, Frank Street, Nuneaton (CV11 5RB)	✗	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	✗	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	✗	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)	✗	CV10 8JY	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 Joseph's RC First School at Coton Road, Nuneaton	✗	CV11 5TY	Private	WK226511
	Our Lady of the Angels Infant School and St Joseph's 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, Benlly Road, Nuneaton, CV11 5LR			Private	WK471379
118 B	St Paul C of E Primary School, Nuneaton	✗	CV10 8NH	Unregistered	
119 B	Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	✗	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	✗	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	✗	CV11 6HJ	WCC	WK473130
	Land on the East Side of Windemere Avenue, Nuneaton			Private	WK313856
	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	WK458966
124 B	Wembrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton	✓	CV11 4LU	NBBC	WK448965
125 B	Elton 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, Ra	✓	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, Glebe Avenue, Bedworth, CV12 0DP	✗	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	✗	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	Whitestone Infant School, aka Land on the South West Side of Magyer Crescent Nuneaton	✗	CV11 4SQ	WCC	WK23140
137 B	Attleborough Mills, Attleborough Road, Nuneaton (aka Holman Way)	✗		Private	WK256088
138 B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton	✗	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	✗	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



A

Northwest Nuneaton



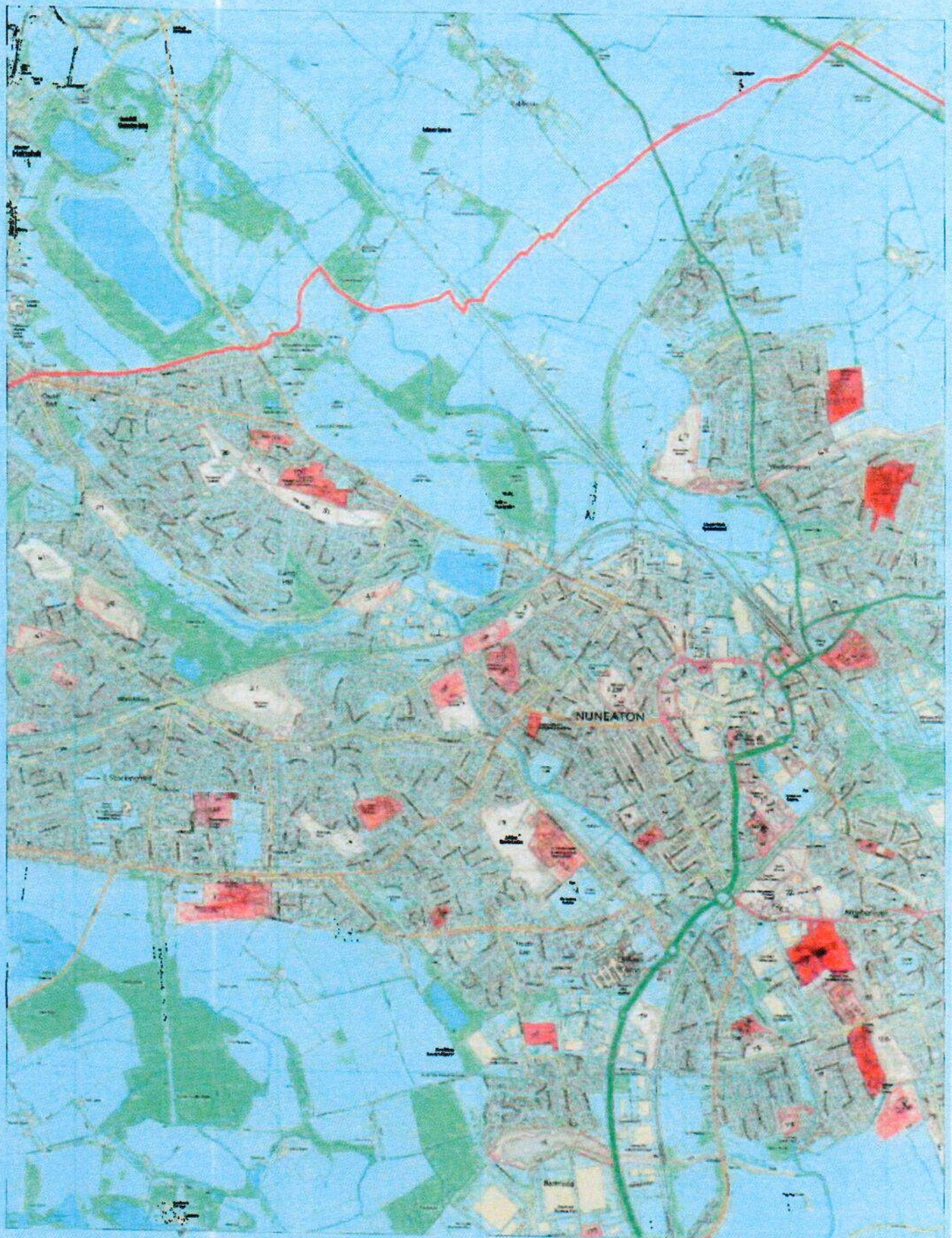
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100018416 2018/19

Scale
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B

North of Nuneaton

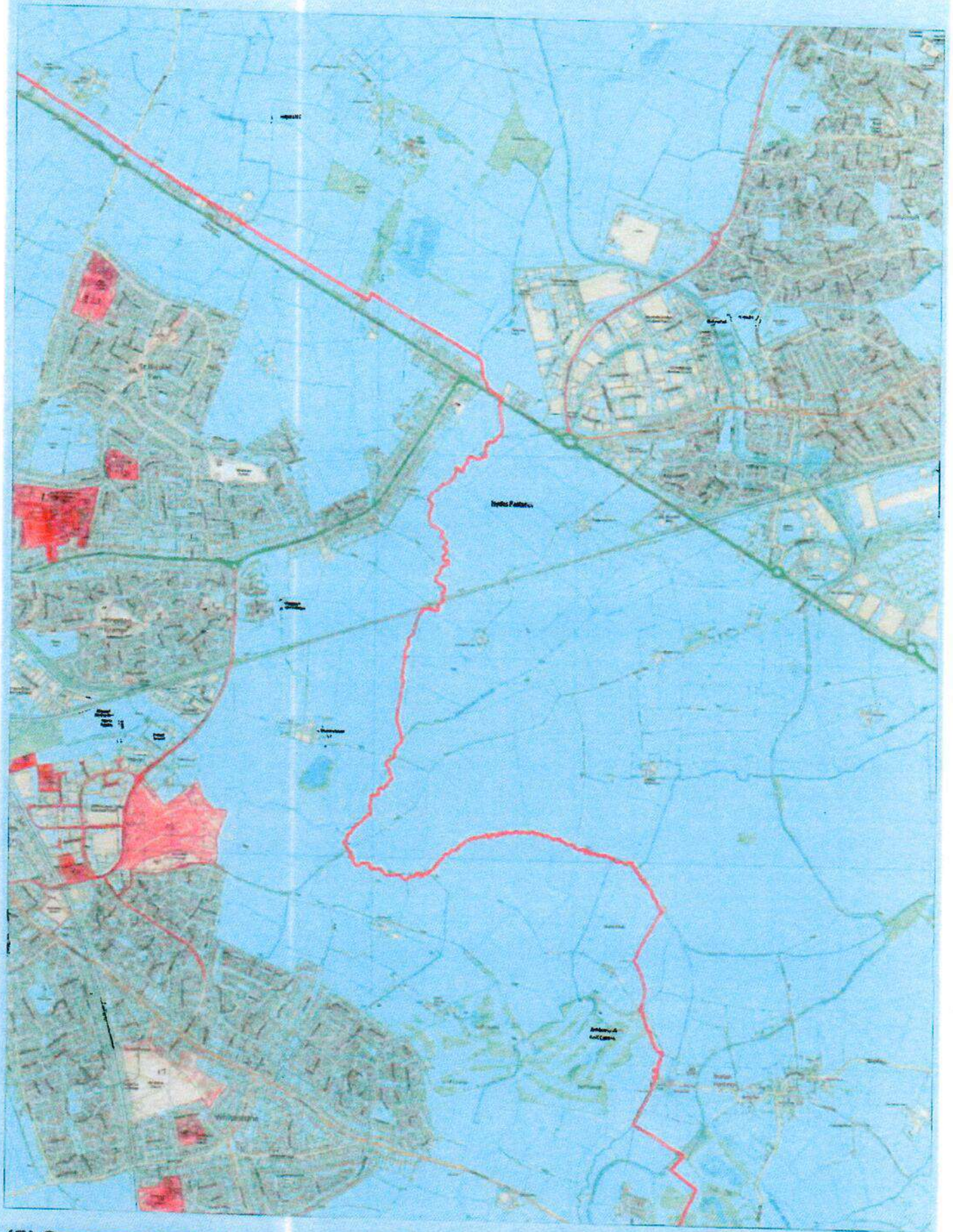


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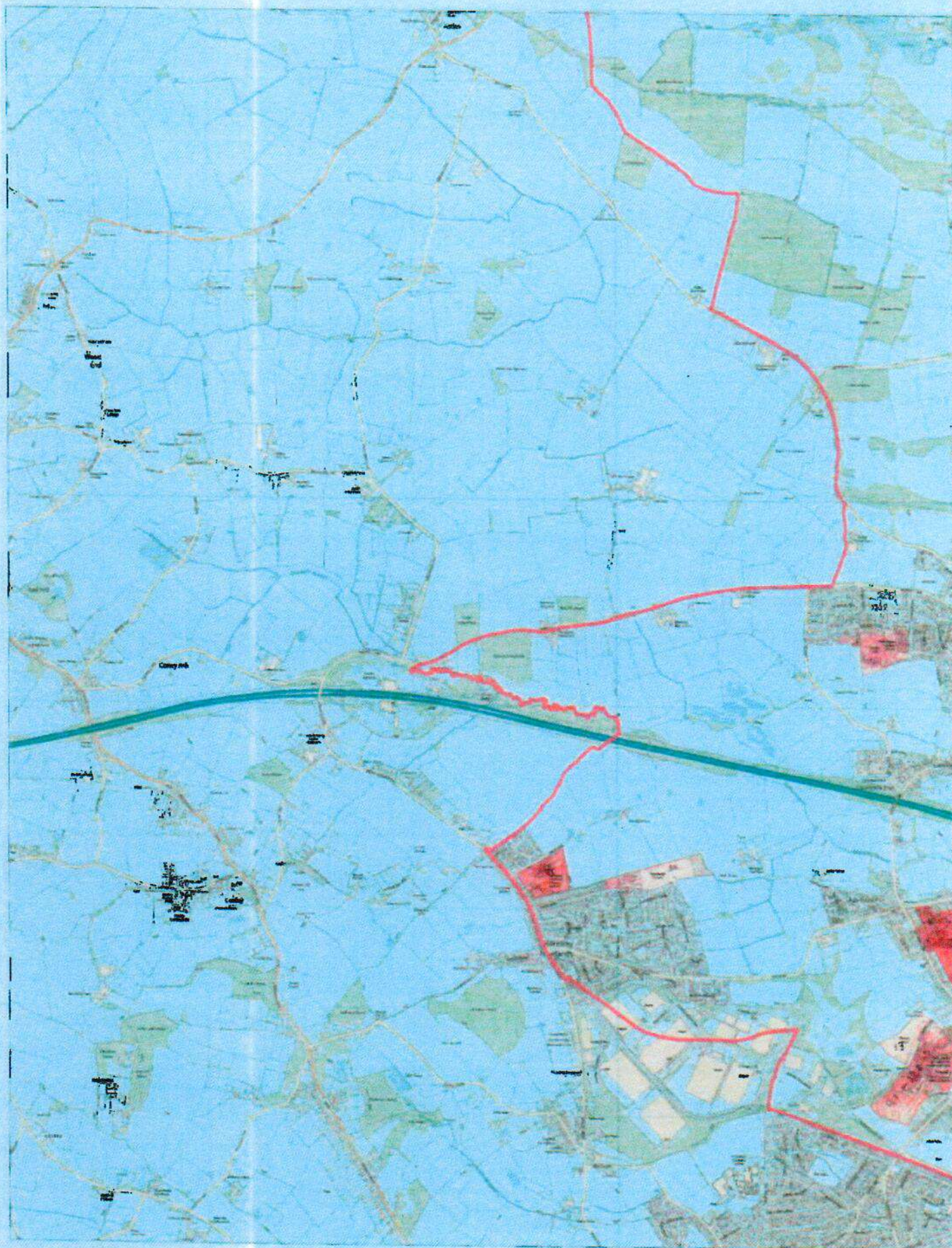
C

Northeast Nuneaton



D

Southwest Bedworth



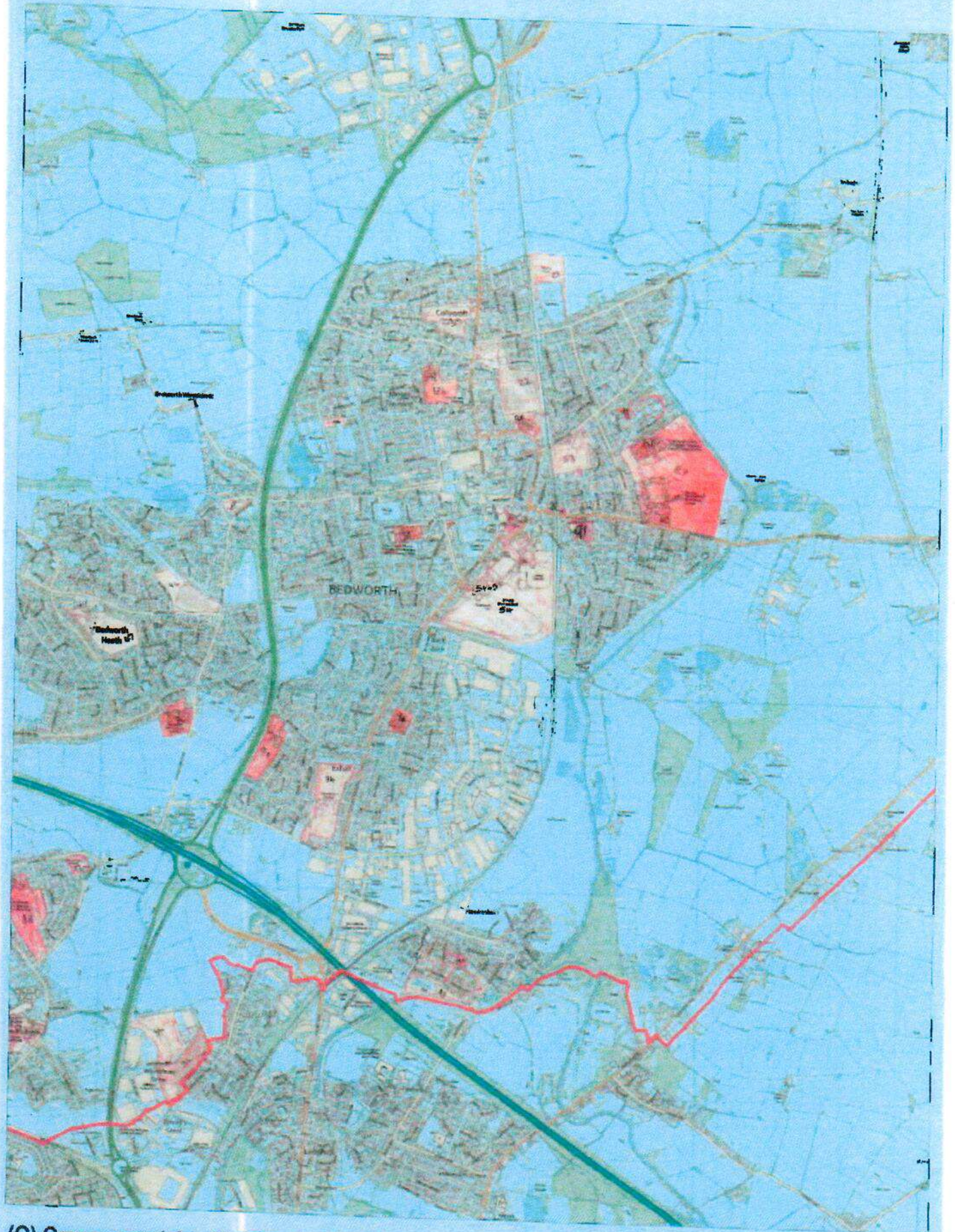
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385

E

South of Bedworth

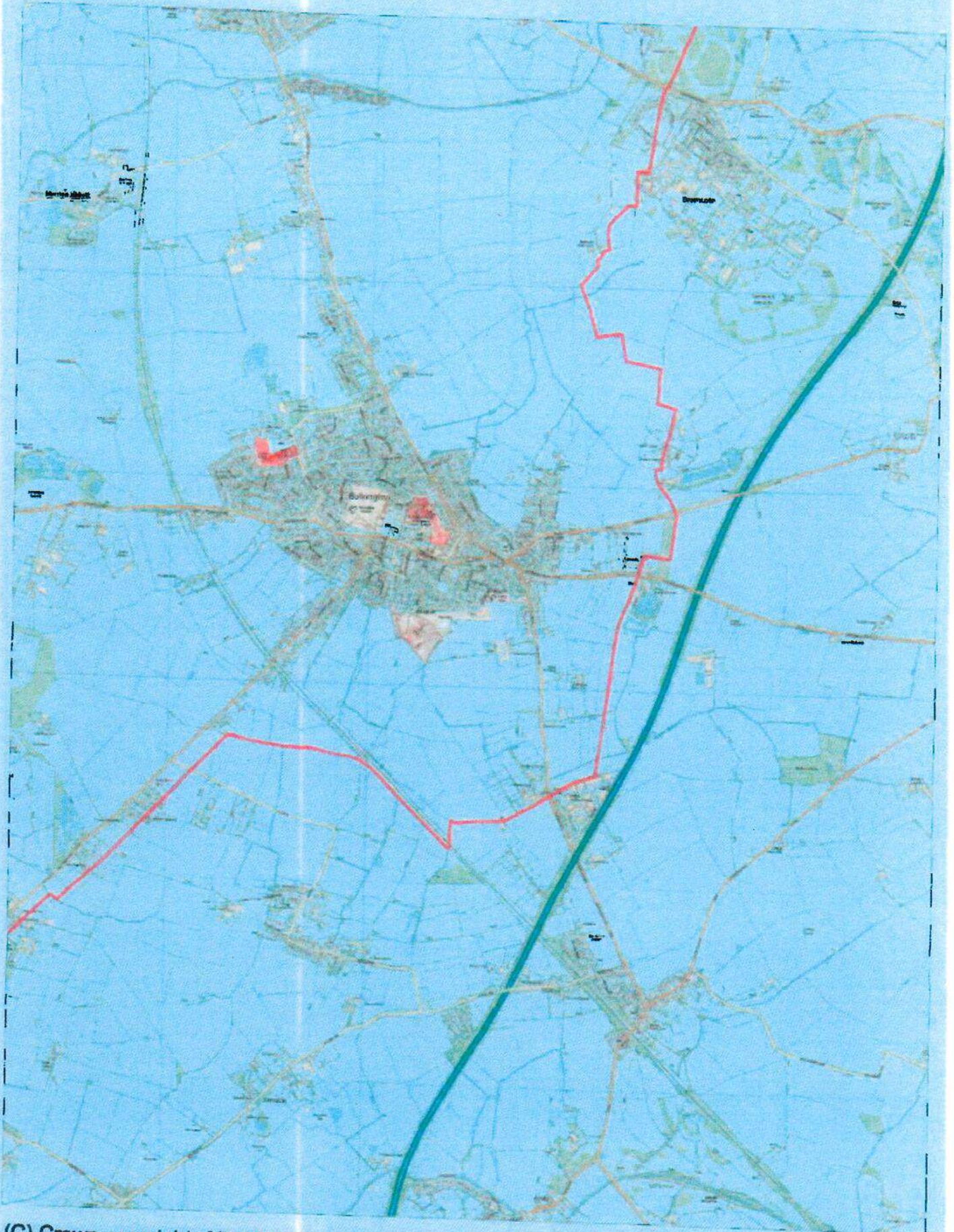


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Scale
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F

Southeast Bedworth



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100018416 2018/19

Scale
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IN THE HIGH COURT OF JUSTICE
QUEENS BENICH DIVISION

QB-2019-000616

B E T W E E N:

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

Claimants

-and-

(1) MR THOMAS CORCORAN AND 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

"HMM3"

This is the exhibit marked "HMM3"

referred to in the Witness Statement of Harry Michael Mellor

Statement of Truth

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

Signed:


Harry Michael Mellor

Dated: 23rd May 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**

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

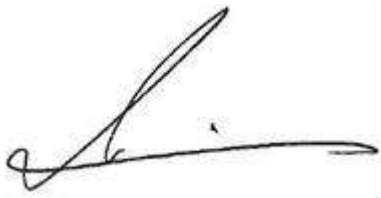
WILL SAY as follows:-

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 black ink, appearing to read 'Philip Richardson', written over a horizontal line.

Philip Richardson
Director of Planning and Regulation

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

**THIS IS THE EXHIBIT PR1 REFERRED TO IN THE
WITNESS STATEMENT OF PHILIP RICHARDSON**

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

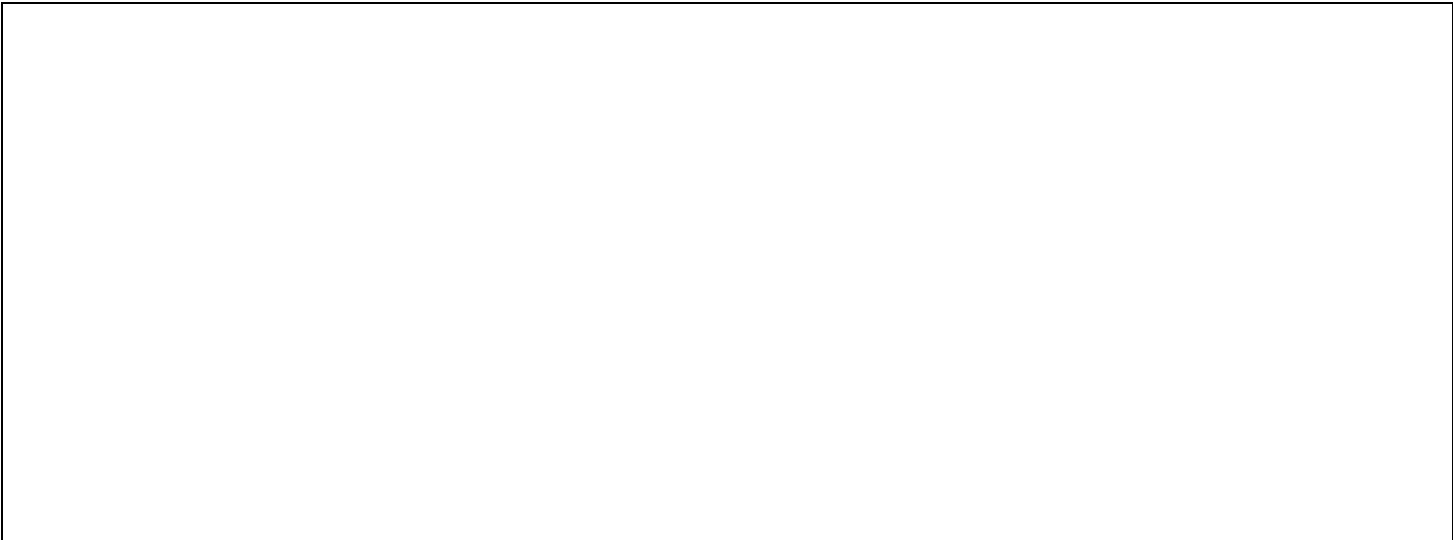
☒ the evidence set out in the box below

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.

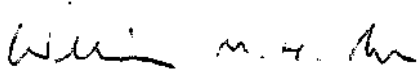


Statement of Truth

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

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**



QB-2019-000616

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 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

**THIS IS THE EXHIBIT PR2 REFERRED TO IN THE
WITNESS STATEMENT OF PHILIP RICHARDSON**

IN THE HIGH COURT OF JUSTICE

Claim Number: QB-2019-000616

QUEEN'S BENCH DIVISION

IN THE MATTER OF S222 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 4 OF THE ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2-10 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 Pat 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:

2. 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.
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 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.
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 the express permission from the owner of the land.

6. 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.

Persons Unknown (the Fifty-Fourth Defendant) are forbidden from:

7. 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 an waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.
11. There be a power of arrest attached to prohibitions 2-10 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 Claimant to vary or discharge this order (or so much of it as affects that person)
16. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

17. A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or his instructions or with his encouragement.
18. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by 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 WG08 Royal Courts of Justice, Strand, London, WC2A 2LL (020 7947 6010).

SCHEDULE 1 – LIST OF DEFENDANTS

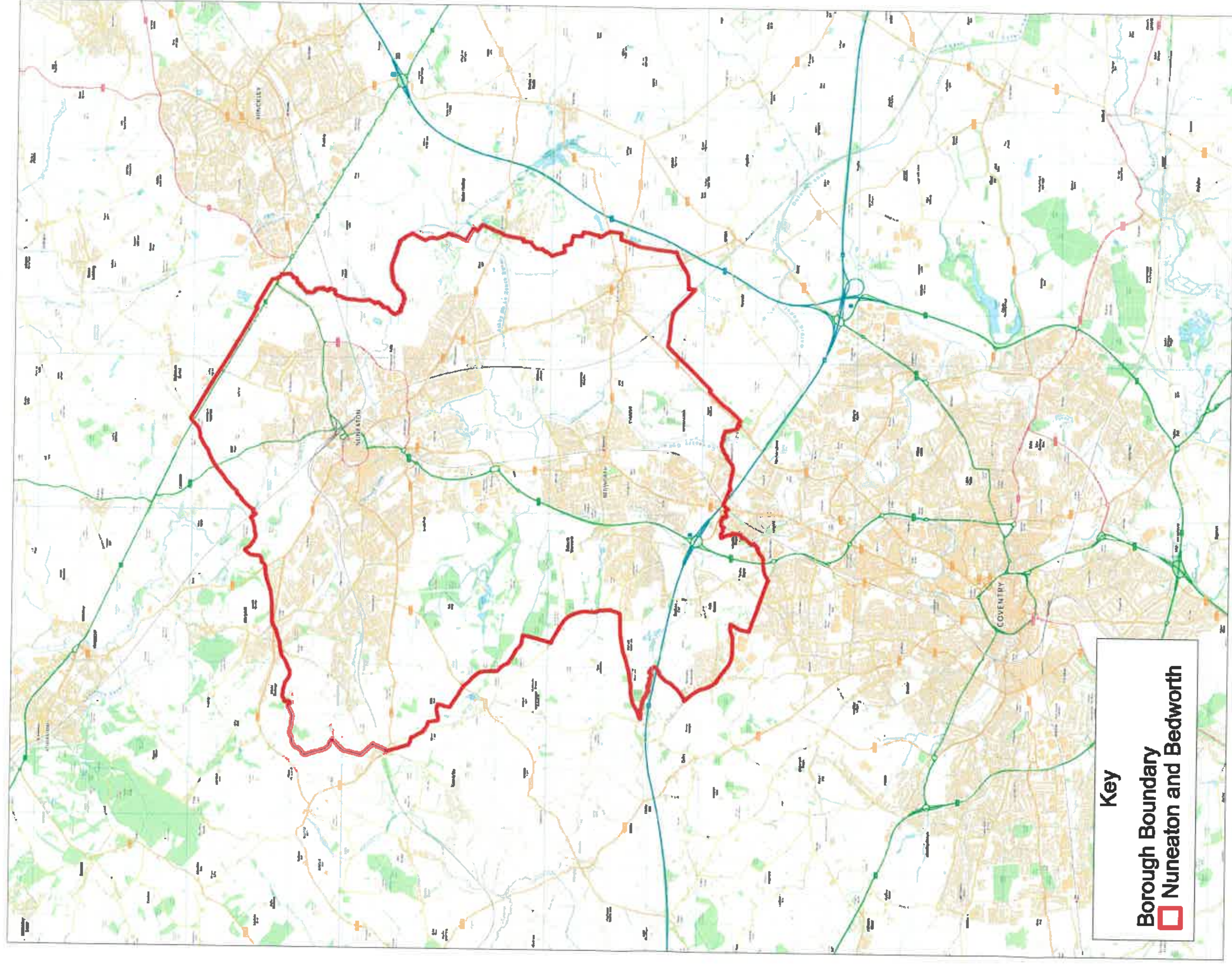
List of Defendants and their addresses

- (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	WK446269
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	WK449599
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/ WK178804
6 B		Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	x	CV11 4BW	Private	WK398436
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	WK450296
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, Chivers 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 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	WK448160
23 E		Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓		NBBC	WK448256
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 Chaple, 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)

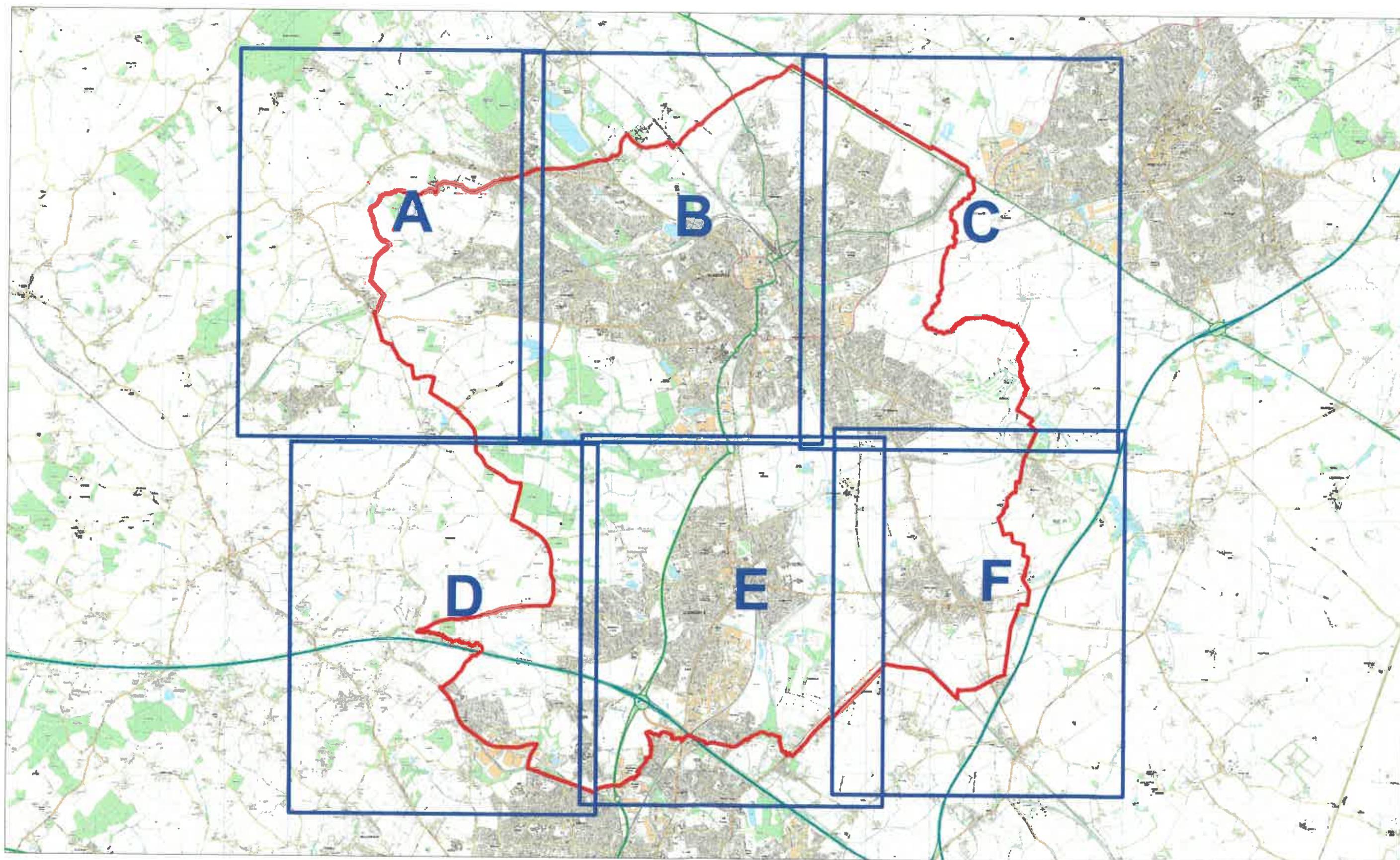
27	F	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	x	CV12 9RF	NBBC	WK448510/ WK448500
28	F	Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK448849
29	B	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK439320
30	B	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden 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 Freesland Rise, Whittleford and land lying to the West of Bucks Hill (aka Freesland Rise)	✓	CV10 9QF	NBBC	WK319146/ WK326554
42	B/A	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Fernsham 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, Smorral Lane	✓	CV12 0GE	Private	WK380708
47	E	Newdigate Recreational Ground - Land at Smorral Lane, Bedworth	✓	CV12 0JP	NBBC	WK449987
48	A	Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thornions 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 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 Buttermere Avenue, Nuneaton	✓	CV11 6EP	NBBC	WK210986

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 6JH	NBBC	WK448886
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 Pallett 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	WK450499
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 Gala Fields)	✓		NBBC	WK452276
72	B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground)	✓		NBBC	WK448965
73	B	Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	x		NBBC	WK449842/ WK449819
74	B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton	x	CV11 5PQ	NBBC	WK447475
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/ 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 5TY	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	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 (CV79AH)	✓	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 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 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 8JZ)	✓	CV7 8JZ	WCC	WK427632/WK477207
96	D	Newdigate Primary School and Nursery - aka Land lying to the South of Smorral Lane, Goodyears End, Bedworth and Land lying to the South of smorral 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 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	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	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, Windermere Avenue, Nuneaton CV11 6HJ	x	CV11 6HJ	WCC	WK473130
	"	Land on the East Side of Windermere Avenue, Nuneaton			Private	WK131856
	"	St Nicolas C of E First School, Windermere 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	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, Rad	✓	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, Glebe 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

Key for traveller encampment maps



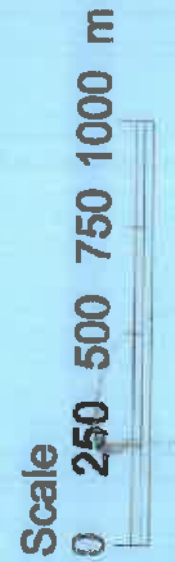
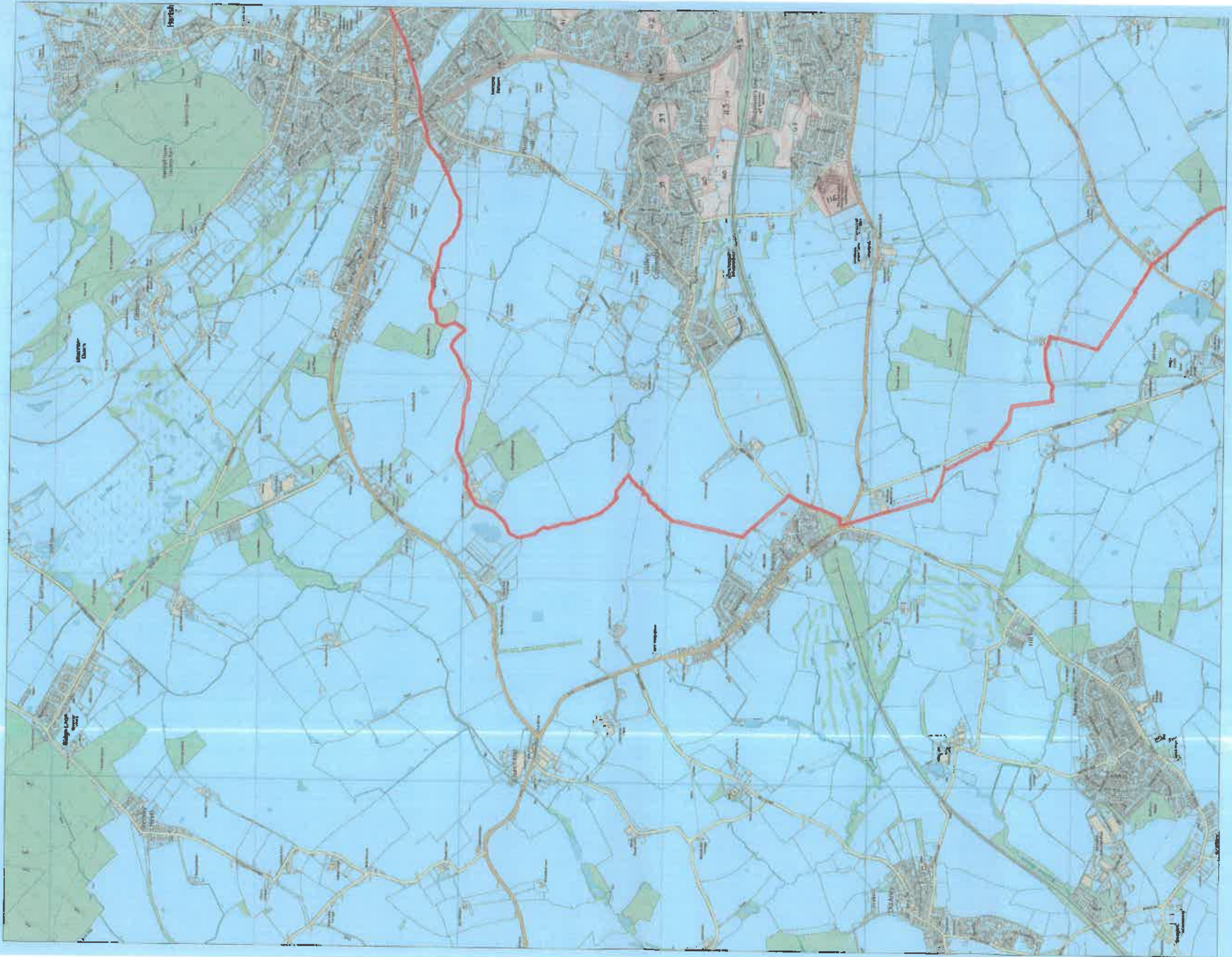
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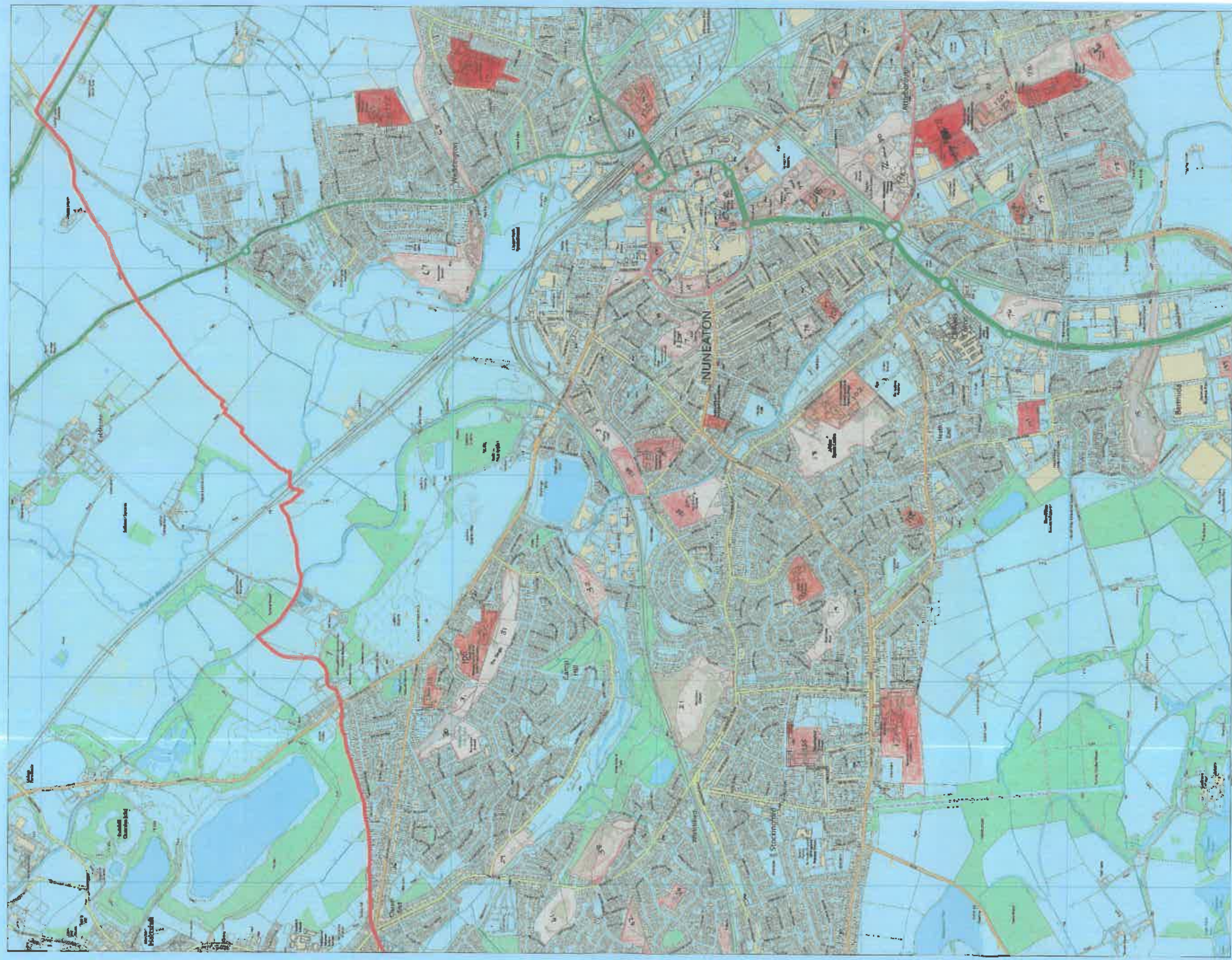
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Northwest Nuneaton

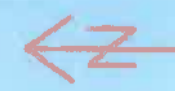


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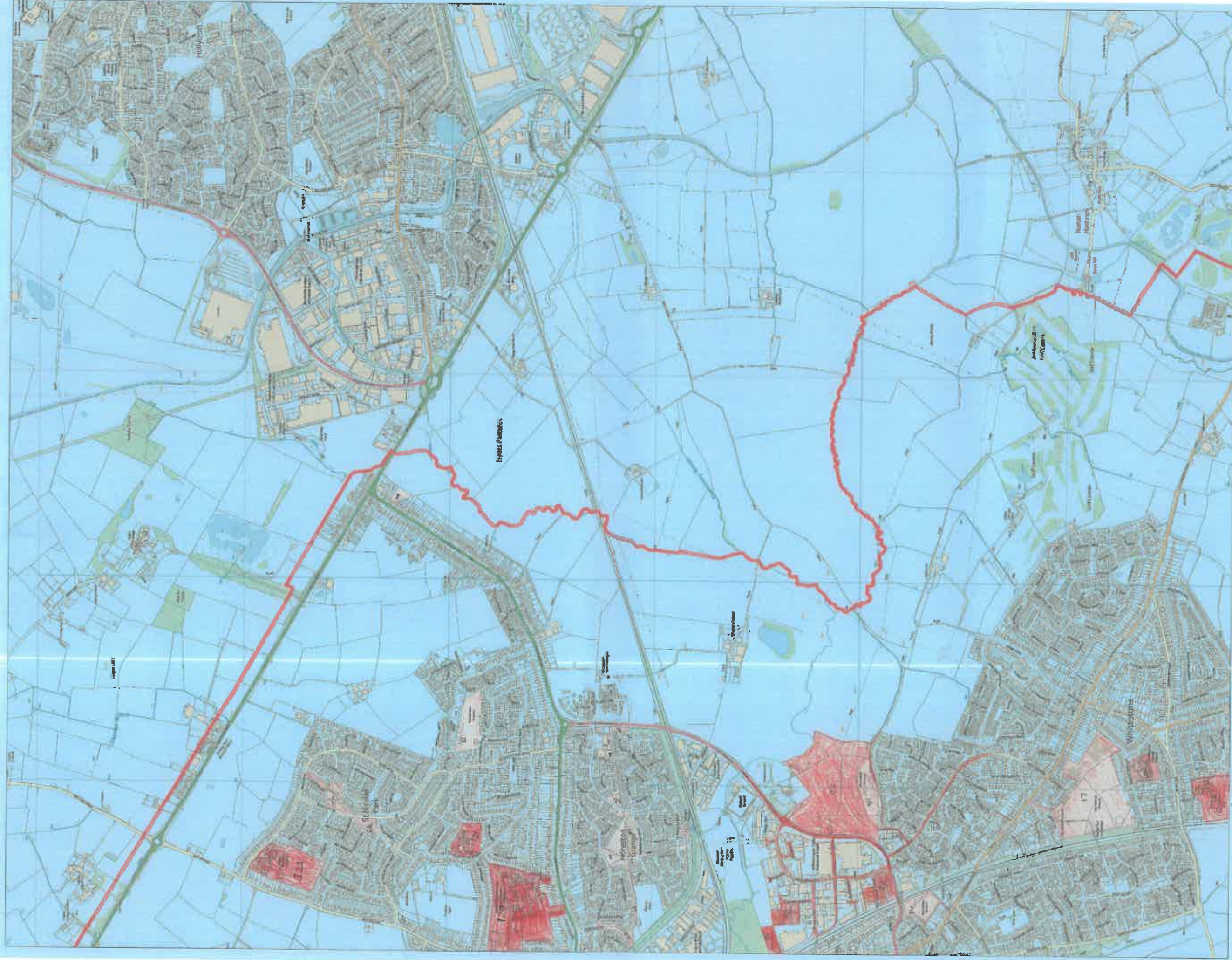
North of Nuneaton



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Northeast Nuneaton



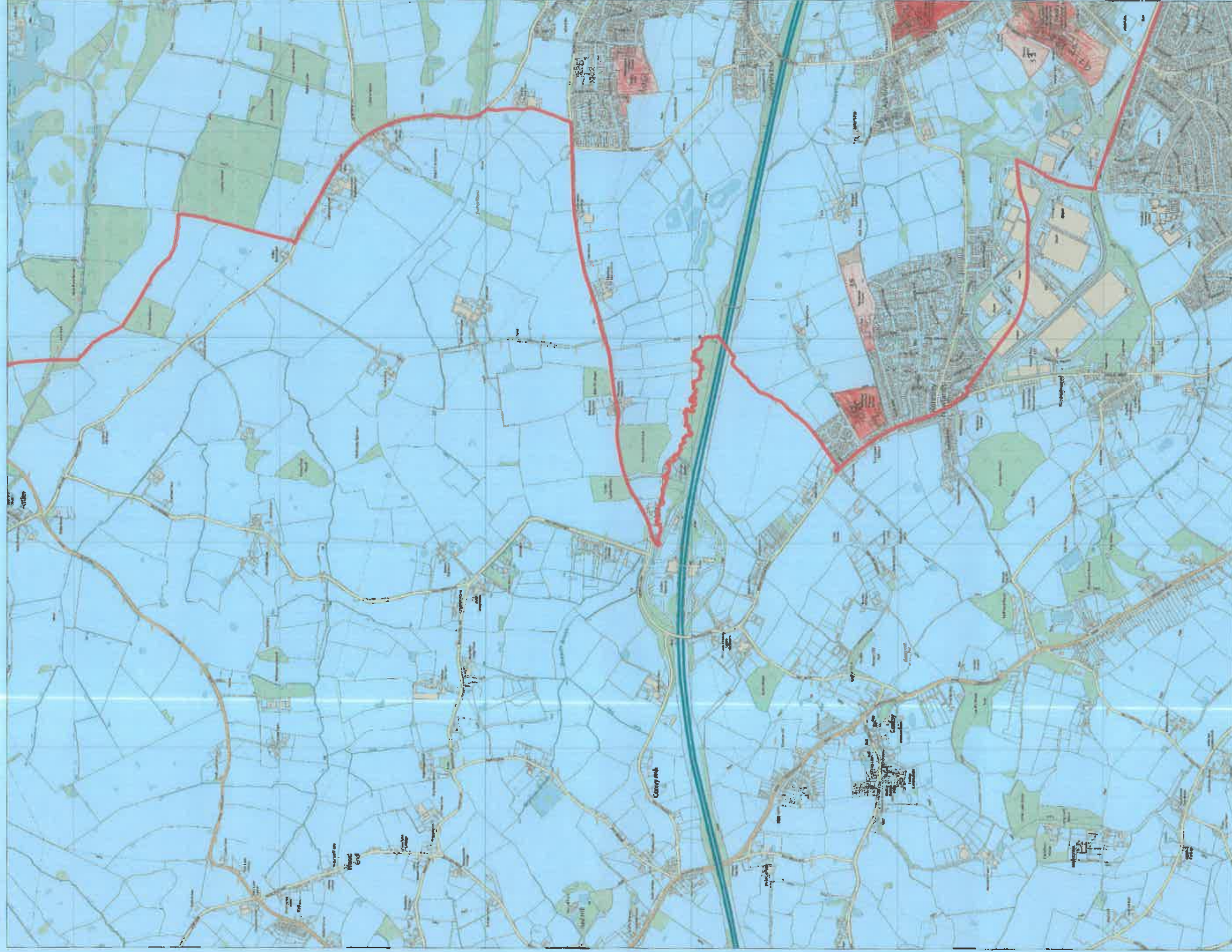
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D

Southwest Bedworth



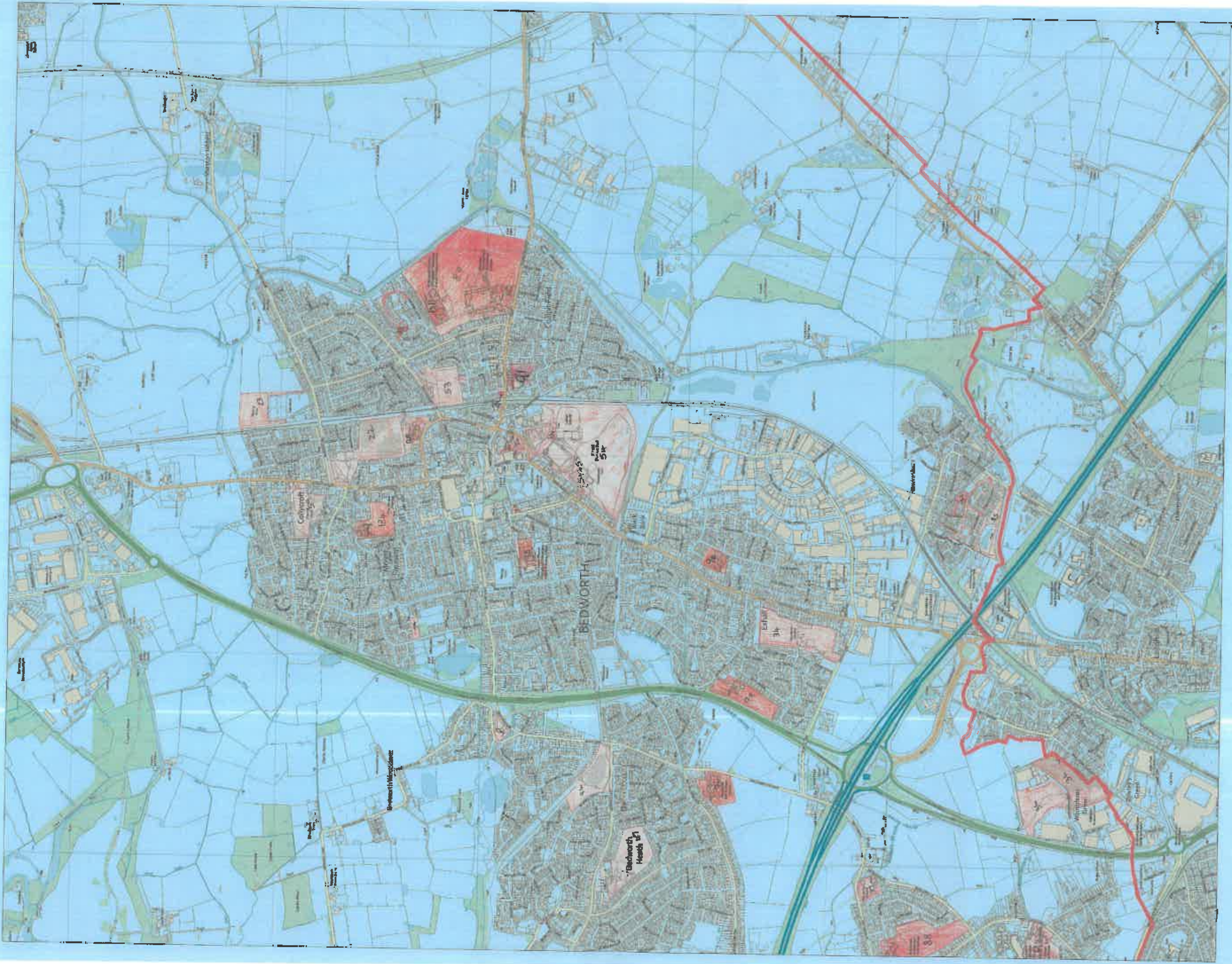
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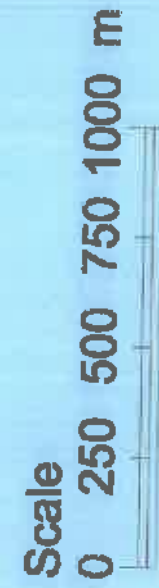


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South of Bedworth

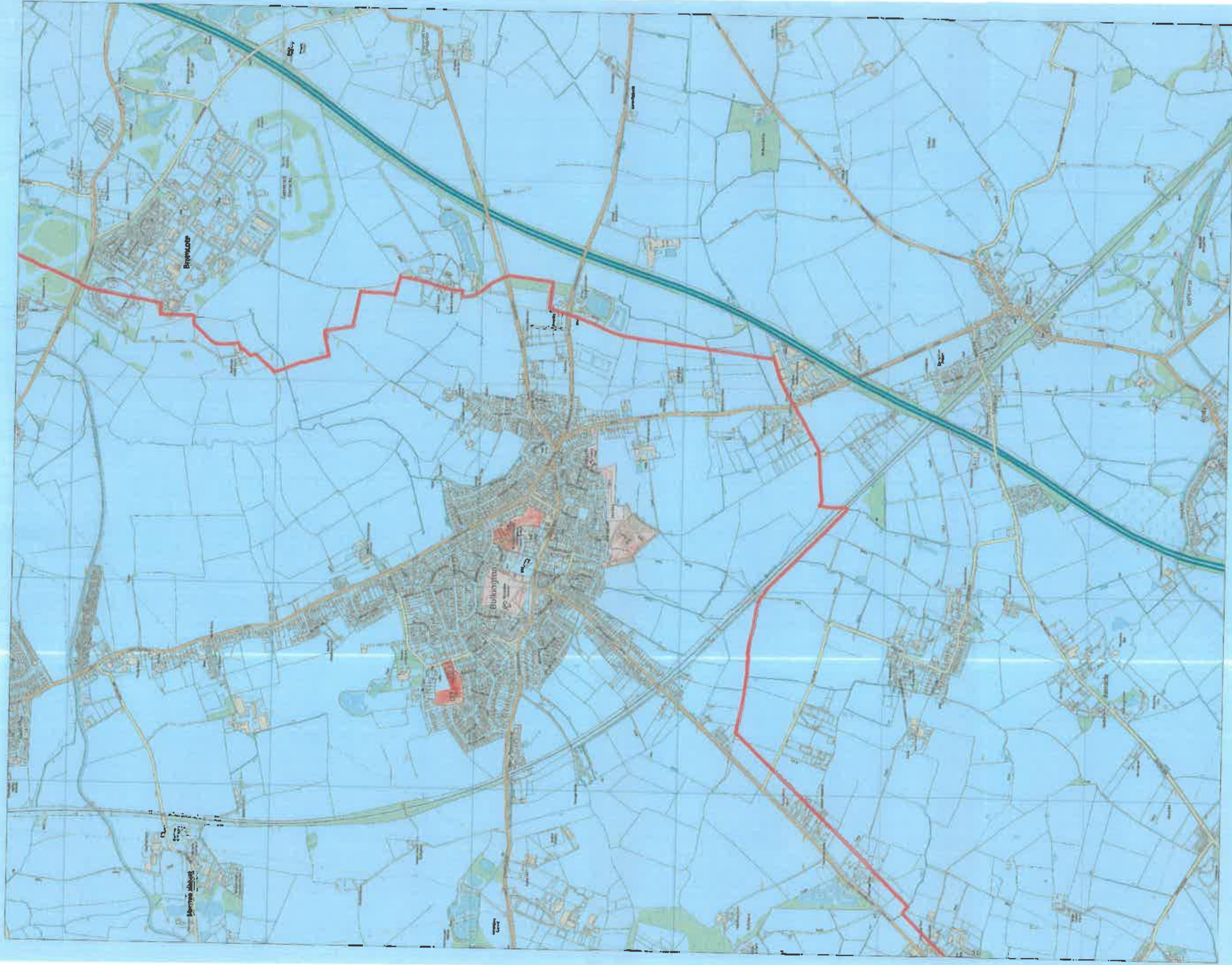


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F

Southeast Bedworth



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Scale
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PHILIP RICHARDSON MA LLB (HONS) BARRISTER
DIRECTOR –DEMOCRACY, PLANNING & PUBLIC PROTECTION

Mr Aaron McDonaugh
9 Sandiacre
Long Green
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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
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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.

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: 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.

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: 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.

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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,

X424-409B/00352029

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
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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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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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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.
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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: 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
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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.
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Tel: 01273 234 777
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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?

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Signature:

Name:

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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.

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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.
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	<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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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?

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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

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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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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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,

X424-409B/00352020

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

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 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

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 Costalot Stables, Heath Road, Leicestershire LE67 1DG 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 12.10p.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	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.
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:

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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 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.
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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.

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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
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.

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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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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: 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.)

Please see over

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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

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 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.

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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.

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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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.
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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.

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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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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 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

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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 regulating the use of car parks or with the express permission from the owner of the land.
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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.

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
	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: 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

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 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.

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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 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.

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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: 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 Filed, 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.

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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: 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.

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: 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.)

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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 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	<p>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.</p> <p>Leaving human excrement, used toilet paper, bagged refuse and litter on the land.</p>	<p>14th January 2019</p> <p>24th January 2019</p>	<p>Philip Richardson 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>

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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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.
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. 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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Advice and assistance may also be available from:

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Tel: 01273 234 777

email: fft@ghpsy-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.)

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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.

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. 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: 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

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
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

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 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	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: 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.)

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.

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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: 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.)

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 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

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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:

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.

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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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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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Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777
email: fft@gypsy-traveller.org

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.)

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 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.

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	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

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: 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

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.

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: 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:

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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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.

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: 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.)

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 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

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 Site, Botley Road, Southampton SO19 0SA 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 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 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	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: 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
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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 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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Brighton, East Sussex, BN1 3XG
Tel: 01273 234 777

email: fft@ghypsy-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.

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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

X424-409B/00352047

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	
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

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

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.

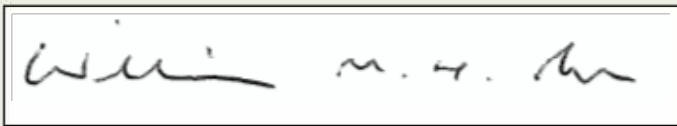
Statement of Truth

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 Kanes Hill Caravan Site, Botley Road, Southampton, SO19 0SA
- (23) JOHN MONGAN, 1 Gapton 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 McDONAUGH, 9 Russell Street, Derby
- ~~(28) SIMON McDONAUGH, 3 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~
- (29) BERNARD McDONAUGH, 37 Boathorse Road, Stoke-On-Trent, Staffordshire, ST7 4JA
- (30) JOHN McDONAUGH, Caravan 7 Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD
- (31) MIKE McDONAUGH, 62 De Laly Street, Ashton-On-Ribble, Preston, Lancashire, PR2 2DD
- (32) MARTIN McDONAUGH, 29 Speyside Court, Orton, Southgate, Peterborough, PE2 6SN
- (33) AARON McDONAUGH, 9 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- ~~(34) KATHLEEN McDONAUGH, 3 Orchard View, Horseman Side, Brentwood, Essex, CM14 5SU~~
- (35) WINNIE McDONAUGH, 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 McDONAUGH, No Fixed Abode~~
- ~~{47} — EDDIE (AKA EDWARD) WARD, No Fixed Abode~~
- ~~{48} — CHRISTOPHER McDONAUGH, 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

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 McDonaugh** 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.**
- **LS18XXB** 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**.
- **ND62HWJ** linked to **Owen Maughan**.
- **HG67OJV** 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 Corcoran 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 ATSEA PS946

Dated 1 / 9 / 2021

KING'S BENCH DIVISION

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 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 statement pursuant to the Order of Mr Justice Linden dated 23rd May 2022 (sealed 28 June 2022) and Mr Justice Sweeting dated 25th July 2022.
2. The facts detailed within this statement are either from my own personal knowledge or have been ascertained from officers of the first and second claimant and I am duly authorised to make this statement on the Claimant's behalf.
3. An application to discontinue proceedings against the 44th Defendant William Bridges was made on the 19th May 2022, following receipt of representations from Mr Bridges in November 2021 that he was not the registered owner of the vehicle identified as being part of the unauthorised encampment in the Borough in 2018.
4. On the 11th May 2022 I wrote to Mr Bridges informing him that we would be applying to remove him from the proceedings and informing him of the hearing listed for the 23rd May 2022, should he wish to make further representations in relation to the same. I exhibit a copy of the representations received from Mr Bridges, the sealed Application Notice and my letter of 11 May 2022 to Mr Bridges at Exhibit 'WS/1'.
5. Pursuant to para 1 and 3 of the Order of Mr Justice Linden, I can confirm that the 44th Defendant William Bridges was removed from the proceedings and the Claim Form amended and filed with the Court by William Rose of Sharpe Pritchard

Solicitors on 27th June 2022. A copy of the Amended Claim Form is attached marked Exhibit '**WS/2**'.

6. Pursuant to para 4 of the order of Mr Justice Linden and the further Order of Mr Justice Sweeting granting an extension to file and serve the further updating evidence by 4.30p.m. on 29th July 2022, I can confirm a copy of the Order of Mr Justice Linden dated 23rd May 2022, the updated statement of Philip Richardson dated 27th July 2022 (including exhibits referred to therein) and the statement of Martyn Stephens dated 24th June 2022 were served:-
 - i) By email on the 27th July 2022 on Chris Johnson of the Community Law Partnership by William Rose of Sharpe Pritchard Solicitors on behalf of the Claimants; and
 - ii) By first class post on 27th July 2022 on the remaining named Defendants (1-53).

I attach a copy of the email from William Rose to Chris Johnson dated 27th July 2022 and the copy letter to the named Defendants together with the updated spreadsheet of Defendants on whom service was effected marked Exhibit '**WS/3**'.

7. Pursuant to para 5 of the Order of Mr Justice Linden I can confirm that the following steps were taken in relation to the service of the Amended Claim Form and Particulars of Claim; updated Scott Schedules (on 1st to 53rd Defendants remaining) and the Application to add a further site to the claim (sealed on 18 August 2022) together with supporting statements of Philip Richardson dated 17 August 2022 and John Bosworth dated 16 August 2022 on the remaining defendants and persons unknown:
 - a. On 18 August 2022, I emailed Lara McNab of Warwickshire County Council to request that the above documents and the Notice to Persons Unknown be placed at the sites belonging to Warwickshire County Council. Lara McNab confirmed by email on 19th August 2022 that she had sent the attachments to the School sites asking for the documents to be placed in a clear plastic envelope and posted on their sites and also sent the same to the County Gypsy and Traveller team for them to put the notices on the remaining County Council sites. I attach a copy of my email sent by Lara McNab and her response marked exhibit '**WS/4**'.
 - b. The Amended Claim Form, updated Scott Schedules and Application to add a further site together with the supporting evidence referred to above were posted by first class post to the remaining 1st to 53rd Defendants on 18 August 2022. The Claimant did not receive any notifications of undelivered mail. I attach a copy of the covering letter enclosing the above attachments marked '**WS/5**'.
 - c. Officers working in the Claimant's parking services department were requested to serve the sites owned and managed by Nuneaton and Bedworth Borough Council and I received confirmation from the officers that the Notice to Persons Unknown, Amended Claim Form, and Application Notice to add the further site together with the supporting evidence as referred to above were served at these sites between 19

August 2022 and 22 August 2022. I attach a copy of the spreadsheet provided by the officers confirming the sites served marked exhibit **WS/6**.

- d. Furthermore I can confirm that the above documents were also uploaded to the First Claimant's Website at <https://www.nuneatonandbedworth.gov.uk/downloads/download/181/unauthorised-encampment-injunction> on 24th August 2022;
- e. I also received confirmation from William Rose at Sharpe Pritchard that the above documents were served on Mr Chris Johnson of the community Law Partnership via email on 19 August 2022. I attach the email from William Rose marked **'WS/7'**.

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.

Name: Waheeda Sheikh

Position held: Solicitor to the Council

Signed: 

Date: 9 December 2024

IN THE HIGH COURT OF JUSTICE

CLAIM NO: QB-2019-000616

KING'S BENCH DIVISION

BETWEEN

**(3) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(4) WARWICKSHIRE COUNTY COUNCIL**

Claimants

AND

**(3) THOMAS CORCORAN
(4) – (53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

EXHIBIT WS/1

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.)

→ Issue was 'supposedly' sorted, but evidently it was not. (mistaken identity)

There are two possibilities for how this issue of mistaken identity could've occurred.

Firstly, the police statements say that at 'Pingles Leisure centre car park', PNC records show my vehicle, registration YM15 UNV supposedly at the scene between '24.08.2018' and '30.08.2018'. I only acquired the vehicle on the 30.10.2018, and DVLA records (proof of ownership and registered sale of vehicle) will back up this point (I will also email evidence of this to Waheeda Sheikh).

Secondly, on the following page of the police statement (page 5), a vehicle with the number plate YN15, UNV linked to a 'Patrick Maughan' is stated. So, maybe my number plate has been mistakenly mixed up with this very similar number plate. Either way, it wasn't me!

4. Do you intend to attend (or be represented at) the final hearing?

Yes/No

→ due to the
being a mistaken
identity.

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.)

N/A, see previous.

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: William Nicholas Tylos Bridges

Date: 04/11/2021

IN THE HIGH COURT OF JUSTICE

CLAIM NO: QB-2019-000616

KING'S BENCH DIVISION

BETWEEN

**(5) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(6) WARWICKSHIRE COUNTY COUNCIL**

Claimants

AND

**(5) THOMAS CORCORAN
(6) – (53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

EXHIBIT WS/2



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 and the Order of Mr Justice Linden made on 23 May 2022. All edits appear in RED and Green

In the High Court of Justice Queen's Bench Division	
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 1 OF THE CLAIM FORM (except those against whom proceedings have been discontinued).
(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 Claimants 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~~ Plot 10 Kirby Glebe Farm,
Hartshill, Nuneaton CV10 0TB

See attached for further details

	£
Court fee	528
Legal representative's costs	TBA
Issue date	22 February 2019

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

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 ~~issued a~~ 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 if 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.

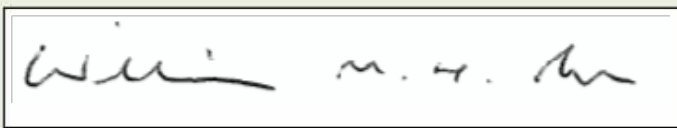
Statement of Truth

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 Kanes Hill Caravan Site, Botley Road, Southampton, SO19 0SA
- (23) JOHN MONGAN, 1 Gapton 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 McDONAUGH, 9 Russell Street, Derby
- ~~(28) SIMON McDONAUGH, 3 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~
- (29) BERNARD McDONAUGH, 37 Boathorse Road, Stoke-On-Trent, Staffordshire, ST7 4JA
- (30) JOHN McDONAUGH, Caravan 7 Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD
- (31) MIKE McDONAUGH, 62 De Laly Street, Ashton-On-Ribble, Preston, Lancashire, PR2 2DD
- (32) MARTIN McDONAUGH, 29 Speyside Court, Orton, Southgate, Peterborough, PE2 6SN
- (33) AARON McDONAUGH, 9 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- ~~(34) KATHLEEN McDONAUGH, 3 Orchard View, Horseman Side, Brentwood, Essex, CM14 5SU~~
- (35) WINNIE McDONAUGH, 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 McDONAUGH, No Fixed Abode~~
- ~~{47} — EDDIE (AKA EDWARD) WARD, No Fixed Abode~~
- ~~{48} — CHRISTOPHER McDONAUGH, 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

IN THE HIGH COURT OF JUSTICE

CLAIM NO: QB-2019-000616

KING'S BENCH DIVISION

BETWEEN

**(7) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(8) WARWICKSHIRE COUNTY COUNCIL**

Claimants

AND

**(7) THOMAS CORCORAN
(8) – (53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

EXHIBIT WS/3

Amy Pittam

From: William Rose <WRose@sharpepritchard.co.uk>
Sent: 27 July 2022 14:02
To: Chris Johnson
Subject: Nuneaton & Bedworth BC & Ors -v- Corcoran & Ors - QB-2019-000616 (170.19)
Attachments: Witness Statement of Philip Richardson dated 27 07 22.pdf; Exhibit PR1.pdf; Witness Statement of Martyn Stephens dated 24.06.22.pdf

Dear Chris

I attach by way of service copies of the following:-

1. Witness statement of Philip Richardson dated 27 July 2022 and its exhibit.
2. Witness statement of Martyn Stephens dated 24 June 2022.

The statements and exhibits have been ce-filed.

Please acknowledge receipt of this email and its attachments.

Kind regards

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
Director for Planning & Regulation

Starfax No: 0870 608 9457
DX Nuneaton 16458

«AddressBlock»

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:
waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 27th July 2022

Our Ref: WE/X424-409B/

Your Ref:

«GreetingLine»

**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 named Defendants in the above proceedings.

Further my letter of the 11th May 2022, informing you of the Directions Hearing in the above matter, I attach for you information a copy of the Order made by Mr Justice Linden on the 23rd May 2022.

Pursuant to an Order made by Mr Justice Sweeting on 25th July 2022, paragraph 4 of the above Order was varied to allow the Claimants to file and serve updated evidence by 4.30p.m. on 29th July 2022. A copy of the said Order is enclosed.

I therefore enclose the following statements by way of service on you:-

- 1) Witness Statement of Philip Richardson dated 27th July 2022
- 2) Witness Statement of Martin Stephens dated 24th June 2022

You may be able to get advice from local Citizens' Advice Bureau or Legal Advice Centres.

Yours sincerely,

Waheeda Sheikh
Legal Services Manager
On behalf of the Director of Planning and Regulation

NAME	HOUSE NUMBER AND STREET NAME	AREA	COUNTY	POST CODE
Thomas Corcoran	Plot 10 Kirby Glebe Farm	Hartshill	Nuneaton	CV10 0TB
Jessica Dodd	Plot 10 Kirby Glebe Farm	Hartshill	Nuneaton	CV10 0TB
Michael Doyle	6 Sandiacre	long Green, Cressing , Braintree	Essex	CM77 8DL
Luke Delaney	Kirby Glebe Farm	Hartshill	Nuneaton	CV10 0TB
Patrick McGinley	Barn Fisheries, Kirby Glebe Farm	Hartshill	Nuneaton	CV10 0TB
Alphonsus McGinley	7 Sandiacre	long Green, Cressing , Braintree	Essex	CM77 8DL
Michael Stokes	29 Oaktree Field Caravan Site, Odstock Road	Salsbury	Wiltshire	SP2 8BY
Michael Stokes	6 Horsdean Travelers Site, Braypool Lane	Patcham Brighton	East Sussex	BN1 8PP
Dennis Stokes	Plot 6 Kirby Glebe Farm	Hartshill	Nuneaton	CV10 0TB
Dennis Stokes (JNR)	Caravan 6 Dun Roamin Park		Whitfield	NN13 5TD
Brian Stokes	12a, Orchard Drive	Smithy Fen, Cottenham	Cambridgeshire	CB24 8PT
John Maughan	14 Sandiacre	long Green, Cressing , Braintree	Essex	CM77 8DL
Terry Maughan	70 Exton Avenue	Luton	Bedfordshire	LU2 0LJ
Patrick Maughan	12 Bashely Road Caravan Site	Bashley Road	London	NW10 6TH
Owen Maughan	7 Sandiacre	long Green, Cressing , Braintree	Essex	CM77 8DL
Owen Maughan	8 Imari Park, 38 Russell Street		Derby	DE24 8AL
Franics Maughan	14 Sandiacre	long Green, Cressing , Braintree	Essex	CM77 8DL
Martin Maughan	81 Constitution Road	Chatham	Kent	ME5 7DN
Thomas Maughan	11 Kanes Hill Caravan Site, Botley Road		Southampton	SO19 0SA
John Mongan	1 Gapton Hall Road	Great Yarmouth	Norfolk	NR31 0NL
Martin Mongan	9 Limehouses, Boathorse Road,	Stoke-on-trent	Staffs	ST6 4QQ
Leonard Monghan	8 Pendles Paddock, Marlow Road	Stokenchurch, High wycombe	Bucks	HP14 3UW
Paul McDonaugh	9 Russell Street		Derby	
Bernard McDonaugh	37 Boathrse Road	Stoke-on-trent	Staffs	ST7 4JA
John McDonaugh	Caravan 7 Dun Roamin Park	Whitfield, Brackley	Northants	NN13 5TD
Mike McDonaugh	62 De Lacy Street	Ashton-on-Ribble, Preston	Lancashire	PR2 2DD
Martin McDonaugh	29 Speyside Court,	Orton, Southgate	Peterborough	PE2 6SN
Aaron McDonaugh	9 Sandiacre	Long Green, Cressing , Braintree	Essex	CM77 8DL
Winnie McDonaugh	Caravan 14 Dun Roamin Park	Whitfield, Brackley	Northants	NN13 5TD
Michael Ward	Splashes, Castle Acre Road	Swaffham	Norfolk	PE37 7XE
Kathleen Ward	2 Imari Park, 38 Russell Street		Derby	DE24 8AL

Bernie Sweeney
John Connors
Willaim Bridges

11 Kanes Hill Caravan Park, Botley Road
2 Costalot Stables, Heath Road
15 Ling Croft

Brough

Southampton
Leicestershire
North Humberside

SO19 0SA
LE67 1DG
HU15 1TU

IN THE HIGH COURT OF JUSTICE

CLAIM NO: QB-2019-000616

KING'S BENCH DIVISION

BETWEEN

**(9) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(10) WARWICKSHIRE COUNTY COUNCIL**

Claimants

AND

**(9) THOMAS CORCORAN
(10) – (53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

EXHIBIT WS/4

Amy Pittam

From: Lara Macnab <laramacnab@warwickshire.gov.uk>
Sent: 19 August 2022 13:09
To: Waheeda Sheikh
Subject: RE: Nuneaton & Bedworth BC & Ors -v- Corcoran & Ors - QB-2019-000616

Hi Waheeda,

You will have hopefully seen my email to the schools covered by the Injunction asking that they serve the paperwork in accordance with the Directions Order of Justice Linden. I have also sent an email to WCC's Gypsy and Traveller Service asking that they serve the paperwork on the parcels of land within WCC's ownership that are not schools. I shall request a certificate of service from them when they have had the opportunity to serve the paperwork although I am mindful that the time given to serve the documents is really tight. I shall complete a certificate of service to confirm that the paperwork has been provided to the schools for service.

Kind Regards

Lara

Lara Macnab
Senior Solicitor
Team Leader
Planning and Litigation
Law and Governance
Resources
Warwickshire County Council
Tel: 01926 736132
Fax: 01926 413704
Minicom: 01926 476881
Email: laramacnab@warwickshire.gov.uk
www.warwickshire.gov.uk

From: Waheeda Sheikh <waheeda.sheikh@nuneatonandbedworth.gov.uk>
Sent: 18 August 2022 15:28
To: Lara Macnab <laramacnab@warwickshire.gov.uk>
Subject: RE: Nuneaton & Bedworth BC & Ors -v- Corcoran & Ors - QB-2019-000616
Importance: High

Hi Lara

Apologies, can you replace the Amended Claim Form of the 27th June 2022 with the attached, the addresses of the Defendant have been redacted.

Regards

Waheeda

Waheeda Sheikh
Legal Services Manager

Tel: 02476 376897
Email: Waheeda.sheikh@nuneatonandbedworth.gov.uk

Nuneaton and Bedworth Borough Council
Town Hall
Coton Road
Nuneaton
CV11 5AA
www.nuneatonandbedworth.gov.uk

Nuneaton and Bedworth: the place of choice to live, work & visit.

From: Waheeda Sheikh
Sent: 18 August 2022 15:14
To: Lara Macnab <laramacnab@warwickshire.gov.uk>
Subject: Nuneaton & Bedworth BC & Ors -v- Corcoran & Ors - QB-2019-000616
Importance: High

Hi Lara

Hope you are well.

We have been busy preparing and complying with the directions of Mr justice Linden in the above matter. I am attaching the papers for service on the 54th Defendant (Persons Unknown). Please can you arrange for these documents to be placed on the WCC sites as per para 15 of Justice Linden's Order.

If you can confirm once this has been done and provide a certificate of service that would be most helpful.

Kind regards

Waheeda Sheikh
Tel: 02476 376897
Nuneaton and Bedworth Borough Council
Town Hall
Coton Road
Nuneaton
CV11 5AA
www.nuneatonandbedworth.gov.uk

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***** This e-mail has been scanned for all viruses

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Amy Pittam

From: Lara Macnab <laramacnab@warwickshire.gov.uk>
Sent: 19 August 2022 12:46
Subject: High Court Injunction
Attachments: NBBC and WCC Injunction - statement of J Bosworth in support of further site being added to injunction.pdf; NBBC and WCC Injunction - Seventh Statement of Philip Richardson dated 17th August 2022.pdf; NBBC and WCC Injunction - Sealed Application Notice dated 18 August 2022.pdf; NBBC and WCC Injunction - Redacted Amended Claim Form 270622 for service (002).pdf; Directions Order of Mr Justice Linden dated 23 May 2022 (sealed 28 June 2022).pdf; NBBC and WCC High Court Injunction - Notice to Unknown Defendants of final hearing date.doc

Dear Sir or Madam,

As you will be aware, in March 2019 the High Court of Justice granted Nuneaton and Bedworth Borough Council (NBBC) in conjunction with Warwickshire County Council (WCC) an interim Injunction to prohibit both named individuals and persons unknown from setting up encampments on various parcels of land within the Nuneaton and Bedworth administrative boundaries. Part of the parcels of land which the Injunction covers includes various school sites in Nuneaton and Bedworth to which your school is included.

NBBC and WCC are now in the process of applying to the High Court to make that Injunction final. The hearing for that application has been set down in a three day trial window commencing 12 December 2022 with a two day estimate. Ahead of that hearing, the High Court has directed that the attached paperwork has to be served on each of the sites covered by the Injunction by 4.30pm on 22 August 2022.

I would thus be grateful if you could arrange for the attached paperwork to be placed in a clear plastic envelope and affixed to a prominent place on your school site with the following notice:

To Persons Unknown:

a copy of the court documents associated with this paperwork can also be obtained from the Council offices at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA between the hours of 10am and 4pm Monday to Friday, excluding public holidays. A copy of the paperwork can also be found using the following weblink: www.nuneatonandbedworth.gov.uk/injunction.

I would be grateful if could confirm by return when you have had the opportunity to serve the attached paperwork.

Kind Regards

Lara

Lara Macnab
Senior Solicitor
Team Leader
Planning and Litigation
Law and Governance
Resources
Warwickshire County Council

Tel: 01926 736132
Fax: 01926 413704
Minicom: 01926 476881
Email: laramacnab@warwickshire.gov.uk
www.warwickshire.gov.uk

This transmission is intended for the named addressee(s) only and may contain confidential, sensitive or personal information and should be handled accordingly. Unless you are the named addressee (or authorised to receive it for the addressee) you may not copy or use it, or disclose it to anyone else. If you have received this transmission in error please notify the sender immediately. All email traffic sent to or from us may be subject to recording and/or monitoring in accordance with relevant legislation.

**To: All Persons Unknown forming Unauthorised Encampments Within
the Borough of Nuneaton and Bedworth**

In the matter of :-

Claim No: QB – 2019-000616

IN THE HIGH COURT OF JUSTICE – QUEENS BENCH DIVISION

BETWEEN :

**(1) Nuneaton and Bedworth Borough Council (2) Warwickshire County Council
(Claimants)**

– and –

**(1) Thomas Corcoran and (2)-(53) Other Named Defendants and (54) Persons
Unknown Forming Unauthorised Encampments within the Borough of Nuneaton
and Bedworth (Defendants)**

Pursuant to the Order made by Mr Justice Linden on the 23rd May 2022 (copy enclosed),
in accordance with paragraph 5 c. of this Order the following documents are enclosed by
way of service:-

- a. The Amended Claim Form dated 27th June 2022;
- b. Application Notice N244, seeking to add an additional site to the final order
together with the supporting statements of Philip Richardson dated 17th August
2022 and John Bosworth dated 16th August 2022.

**Take Note this matter has now been listed in a 3 day window from the 12th
December 2022 with a 2 day time estimate.**

Should you wish to rely on any evidence at the trial, you must send this and your
responses to the attached Scott Schedule to us and the Court as directed at para 6 and 7
of Mr Justice Linden's Order dated 23rd May 2022, to the following addresses:-

- a. Sharpe Pritchard LLP, Elm Yard, 10-16 Elm Street, London WC1X 0BJ or at
WRose@sharpepritchard.co.uk;
- b. Room WG08, The Royal Courts of Justice, Strand, London, WC2A 2LL or at
QBJudgesListingOffice@justice.gov.uk.

**Please note, all copies of the Court documents and supporting evidence being
relied upon by the Claimant can be obtained by contacting the Legal Services
Team and arranging to view/collect copies of the same from the Council Offices at
Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton,
Warwickshire CV11 5AA between the hours of 10.00a.m. and 4.00p.m. Monday to
Friday, excluding public holidays.**

**The Court documents and supporting evidence can also be found on the Council
website at www.nuneatonandbedworth.gov.uk/injunction.**

You are advised to seek your own independent legal advice in this matter.

KING'S BENCH DIVISION

BETWEEN

(11) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(12) WARWICKSHIRE COUNTY COUNCIL

Claimants

AND

(11) THOMAS CORCORAN
(12) – (53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

EXHIBIT WS/5

PHILIP RICHARDSON MA LLB (HONS) BARRISTER
Director for Planning & Regulation

Starfax No: 0870 608 9457
DX Nuneaton 16458

Thomas Corcoran
Plot 10 Kirby Glebe Farm
Hartshill
Nuneaton
CV10 0TB

Please ask for: Waheeda Sheikh
Direct Line: 02476 376897
Direct e-mail:
waheeda.sheikh@nuneatonandbedworth.gov.uk

Date: 18th August 2022

Our Ref: WE/X424-409B/

Your Ref:

Dear Thomas 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 named Defendants in the above proceedings.

Further my letter dated 27th July 2022, enclosing a copy of the Order made by Mr Justice Linden made on the 23rd May 2022 (further copy enclosed), in accordance with paragraph 5 c. of this Order I enclose by way of service on you the following documents:-

- a) The Amended Claim Form dated 27th June 2022;
- b) A Scott Schedule setting out the allegations against you;
- c) Application Notice N244, seeking to add an additional site to the final order together with the supporting statements of Philip Richardson dated 17th August 2022 and John Bosworth dated 16th August 2022.

This matter has now been listed in a 3 day window from the 12th December 2022 with a 2 day time estimate.

Should you wish to rely on any evidence at the trial, you must send this and your responses to the attached Scott Schedule to us and the Court as directed at para 6 and 7 of Mr Justice Linden's Order dated 23rd May 2022, by sending the evidence and response to the following addresses:-

- a. Sharpe Pritchard LLP, Elm Yard, 10-16 Elm Street, London WC1X 0BJ or at WRose@sharpepritchard.co.uk;
- b. Room WG08, The Royal Courts of Justice, Strand, London, WC2A 2LL or at QBJudgesListingOffice@justice.gov.uk.

Please note, all copies of the Court documents and supporting evidence being relied upon by the Claimant can be obtained by contacting the Legal Services

Team and arranging to view/collect copies of the same from the Council Offices at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA between the hours of 10.00a.m. and 4.00p.m. Monday to Friday, excluding public holidays.

The Court documents and supporting evidence can also be found on the Council website at www.nuneatonandbedworth.gov.uk/injunction.

You are advised to seek you own independent legal advice in this matter.

Yours sincerely,

Waheeda Sheikh
Legal Services Manager
On behalf of the Director of Planning and Regulation

KING'S BENCH DIVISION

BETWEEN

(13) NUNEATON AND BEDWORTH BOROUGH COUNCIL
(14) WARWICKSHIRE COUNTY COUNCIL

Claimants

AND

(13) THOMAS CORCORAN
(14) – (53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

EXHIBIT WS/6

To: All Persons Unknown forming Unauthorised Encampments Within the Borough of Nuneaton and Bedworth

In the matter of :-

Claim No: QB – 2019-000616

IN THE HIGH COURT OF JUSTICE – QUEENS BENCH DIVISION

BETWEEN :

(1) Nuneaton and Bedworth Borough Council (2) Warwickshire County Council
(Claimants)

– and –

(1) Thomas Corcoran and (2)-(53) Other Named Defendants and (54) Persons
Unknown Forming Unauthorised Encampments within the Borough of Nuneaton
and Bedworth (Defendants)

Pursuant to the Order made by Mr Justice Linden on the 23rd May 2022 (copy enclosed),
in accordance with paragraph 5 c. of this Order the following documents are enclosed by
way of service:-

- a. The Amended Claim Form dated 27th June 2022;
- b. Application Notice N244, seeking to add an additional site to the final order
together with the supporting statements of Philip Richardson dated 17th August
2022 and John Bosworth dated 16th August 2022.

**Take Note this matter has now been listed in a 3 day window from the 12th
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Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton,
Warwickshire CV11 5AA between the hours of 10.00a.m. and 4.00p.m. Monday to
Friday, excluding public holidays.**

**The Court documents and supporting evidence can also be found on the Council
website at www.nuneatonandbedworth.gov.uk/injunction.**

You are advised to seek your own independent legal advice in this matter.

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	WK446269
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	WK449599 11.24am 20/8/22
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/ WK178804 10.24am 20/8/22
6	B	Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	x	CV11 4BW	Private	WK398436 11.42 20/8/22
7	B	Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park)	x	CV11 5DB	NBBC	WK450184 10.32am 20/8/22
8	B	Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park)	x	CV11 4BS	Private	WK366584 12.50pm 19/8/22
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 12.35pm 19/8/22
12	B	Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)	x	CV11 4AL	NBBC	WK426642 12.40pm 19/8/22
13	B	Land at Coton Road, Nuneaton (aka Riverside Car Park)	x	CV11 5AA	NBBC	WK450296 12.35pm 19/8/22
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/ 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 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	WK448160
23	E	Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓		NBBC	WK448256
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 Chaple, 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 9LT	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 Ramsden 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 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 Merlin Avenue, south east side of Freesland Rise, Whittleford and land lying to the West of Bucks Hill (aka Freesland Rise)	✓	CV10 9QF	NBBC	WK319146/ WK326554
42	B/A	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Fernsham 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, Smorrall Lane	✓	CV12 0GE	Private	WK380708
47	E	Newdigate Recreational Ground - Land at Smorrall Lane, Bedworth	✓	CV12 0JP	NBBC	WK449987
48	A	Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thorntons 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 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 Buttermere Avenue, Nuneaton	✓	CV11 6EP	NBBC	WK210986
62	C	Land at Horseton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	x		NBBC	WK336798/ WK344607

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