

KING'S BENCH DIVISION**B E T W E E N : -**

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

Claimants

-and-

**(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

EVIDENCE OF SERVICE BUNDLE

	<u>Document</u>	<u>Page Nos.</u>
	<u>Statements of Service of original Claim Form on individuals</u>	
1.	Statement of Peter Newham dated 14 March 2019 and exhibit PN1 [service on Thomas Maughan (22) and Bernie Sweeney (41)]	3-41
2.	Statement of Alistair James Mellor dated 14 March 2019 and exhibit AJM1 [service on Mike McDonough (31)]	42-78
3.	Statement of Paul Tietjen dated 14 March 2019 and exhibit PT1 [service on John Mongan (23) and Michael Ward (38)]	79-115
4.	Statement of Harry Michael Mellor dated 15 March 2019 and exhibits HMM1 and HMM2 [service on Thomas Corcoran (1), Jessica Dodd (2), Michael Doyle (3), Luke Delaney (4), Patrick McGinley (5), Alphonsus McGinley (6), Michael Stokes (7), Michael Stokes (8), Dennis Stokes (9), Dennis Stokes (10), Brian Stokes (11), John Maughan (12), Terry Maughan (13), Patrick Maughan (15), Owen Maughan (16), Owen Maughan (17), Francis Maughan (20), Martin Maughan (21), Martin Mongan (25), Leonard Mongan (26), Paul McDonough (27), Bernie McDonough (29), John McDonough (30), Martin McDonough (32), Aaron McDonough (33), Winnie McDonough (35), Kathleen Ward (39), John Connors (42)]	116-153
	<u>Statements of Service of original Claim Form on Sites</u>	
5.	Statement of John Andrew Ingram dated 15 March 2019 and exhibits JAI1 to JAI3	154-197
6.	Statement of Harry Michael Mellor dated 15 March 2019 and exhibits HMM1 to HMM3	198-241

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7.	Second Statement of Paul Tietjen dated 26 April 2019 and exhibit PT1 [service on John Mongan (23) and Michael Ward (38)]	242-267
8.	Second Statement of Alistair James Mellor dated 29 April 2019 and exhibit AJM1 [service on Mike McDonough (31)]	268-293
9.	Second Statement of Harry Michael Mellor dated 23 May 2019 and exhibits HMM1 to HMM3 [service on Thomas Corcoran (1), Jessica Dodd (2), Michael Doyle (3), Luke Delaney (4), Patrick McGinley (5), Alphonsus McGinley (6), Michael Stokes (7), Michael Stokes (8), Dennis Stokes (9), Dennis Stokes Jnr (10), Brian Stokes (11), John Maughan (12), Terry Maughan (13), Patrick Maughan (15), Owen Maughan (16), Owen Maughan (17), Francis Maughan (20), Martin Maughan (21), Thomas Maughan (22), Martin Mongan (25), Leonard Mongan (26), Paul McDonough (27), Bernard McDonough (29), John McDonough (30), Martin McDonough (32), Aaron McDonough (33), Winnie McDonough (35), Kathleen Ward (39), Bernie Sweeney (41), John Connors (42)]	294-321
	<u>Statements of Service of Injunction Order of 19 March 2019 on sites</u>	
10.	Second Statement of John Andrew Ingram dated 22 May 2019 and exhibits JAI1 to JAI3	322-357
11.	Second Statement of Harry Michael Mellor dated 23 May 2019 and exhibits HMM1 to HMM3	358-393
	<u>Service of Amended Claim Form dated 1 September 2021</u>	
12.	Statement of Philip Richardson dated 1 October 2021 and exhibits PR1 and PR2	394-651
	<u>Service of Re-Amended Claim Form pursuant to Order of MJ Linden dated 23 May 2022</u>	
13.	Statement of Waheeda Sheikh dated 9 December 2024 and exhibits WS/1 to WS/7 [service on sites and named Defendants]	652-687
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16.	Statement of Amy Pittam dated 9 December 2024 and exhibits AP/1 to AP/6 [service on sites and named Defendants]	737-793

Claimant
Peter Newman
First
14th March 2019
"PN1"

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 52 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

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

Defendants

WITNESS STATEMENT OF PETER NEWMAN

I, Peter Newman, 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 I did Saturday 9th March 2019 at 11.20 hrs attend at 11 Kanes Hill Caravan Park, Botley Road, Southampton SO19 0SA, serve the defendant Thomas Maughan with the USB Stick containing evidence in support of claim; sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter from my instructing solicitors dated 4th March 2019, by personally handing the documents to the defendant, Thomas Maughan outside 11 Kanes Hill Caravan Park, Botley Road, Southampton SO19 0SA.

2. THAT I did Saturday 9th March 2019 at 11.20 hrs attend at 11 Kanes Hill Caravan Park, Botley Road, Southampton SO19 0SA, serve the defendant Bernie Sweeney with the USB Stick containing evidence in support of claim sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order

– Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter from my instructing solicitors dated 4th March 2019; by leaving the documents at 11 Kanes Hill Caravan Park, Botley Road, Southampton SO19 0SA. At the time of service Thomas Maughan confirmed that the defendant, Bernie Sweeney resides at the address and he would make sure he receives the documents left for him there.

3. True copies of the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter from my instructing solicitors dated 4th March 2019, so served by me is now shown to me marked “PN1”.

Statement of Truth

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

Signed: 

Peter Newman

Dated: 14th March 2019

IN THE HIGH COURT OF JUSTICE

QB-2019-000616

QUEENS BENICH DIVISION

BETWEEN:

(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

"PN1"

This is the exhibit marked "PN1"

referred to in the Witness Statement of Peter Newman

Statement of Truth

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

Signed: 

Peter Newman

Dated: 14th March 2019



Thomas Maughan
11 Kanes Hill Caravan Park
Botley Road
Southampton
SO19 0SA

Email: legal@nuneatonandbedworth.gov.uk

Date: 4 March 2019

Dear Sir/Madam

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

Nuneaton and Bedworth Borough Council & Warwickshire County Council have applied for an injunction in the above named proceedings against you. The Court will hear an application for the interim injunction on 19 March 2019 at the High Court, Queens Bench Division, Royal Courts of Justice, Strand, London.

By order of His Honour Justice Dove dated 22 February 2019, please find attached:

1. Part 8 Claim Form dated 22 February 2019
2. Application for Injunction dated 22 February 2019
3. Order of HHJ Dove for alternative service dated 22 February 2019
4. Draft Interim Injunction Order and attached Schedules to be applied for at the hearing on 19th March 2019
5. Draft Final Order together with Schedules
6. USB Stick containing evidence in support of claim.

The implications of the proposed Interim Order are contained within and include an application for a power of arrest if you are found to be encamped anywhere in the Borough as per Schedule 2 or on any of the sites as per Schedule 3.

A hard copy of the evidence in support of the claim will be provided within 2 working days of receipt of such request.

The documents forming part of this injunction application can also 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).

Yours faithfully,

For and on behalf of Nuneaton and Bedworth Borough Council



Bernie Sweeney
11 Kanes Hill Caravan Park
Botley Road
Southampton
SO19 0SA

Email: legal@nuneatonandbedworth.gov.uk

Date: 4 March 2019

Dear Sir/Madam

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

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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).

Yours faithfully,

For and on behalf of Nuneaton and Bedworth Borough Council



Claim Form (CPR Part 8)

CLAIMANT'S COPY

In the High Court of Justice
Queen's Bench Division

Claim no. QB-2019-000616

Fee Account no.

Help with Fees -
Ref no. (if applicable)

H W F - - -

Claimant

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL
Town Hall, Cotton Rd, Nuneaton CV11 5AA

(2) WARWICKSHIRE COUNTY COUNCIL
Shire Hall, Warwick CV34 4RL



Assigned to Master McCloud

Defendant(s)

(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

See attached for further details

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 Claimants seeks an injunction to protect the First Claimant's administrative area from further unauthorised encampments by the First to Fifty-Third Defendants, 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, [REDACTED]
[REDACTED]
[REDACTED]

See attached for further details

Court fee

£ 528.00

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.

Claim no.

QB-2019-000616

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 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

Statement of Truth

~~*I believe~~ (The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement.

Full name William Maxwell Hunt Rose

Name of claimant's legal representative's firm Sharpe Pritchard LLP

signed 

*(Claimant)(~~litigation friend~~)
(Legal representative)

position or office held Partner
(if signing on behalf of firm or company)

**delete as appropriate*

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.

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>

Application Notice

For help in completing this form please read the notes for guidance form N244 Notes

NOTICE OF HEARING.
APPLICATION WILL BE HEARD AT THE
ROYAL COURTS OF JUSTICE, STRAND, LONDON
WC2A 2LL, UK
DATE 19/13/19
TIME TBC
IN A COURT TO BE CONFIRMED

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.)	Nuneaton & Bedworth Borough Council and Warwickshire County Council
Defendants (including ref.)	(1) Thomas Corcoran & Ors
Date	22 February 2019



1. What is your name or, if you are a solicitor, 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 injunction in the terms of the draft Order attached for the reasons set out in the witness statements of Robert Watson, Martyn Stephens, Katherine Moreton, Philip Richardson and Carol Ingleston and their exhibits.

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. Witness statement of Robert Watson dated 15th February 2019 and its exhibits.
2. Witness statement of Martyn Stephens dated ^{13th}~~19th~~ February 2019 and its exhibits. *x 2*
3. Witness statement of Katherine Ann Moreton dated 19th February 2019 and its exhibits.
4. Witness statement of Philip Richardson dated 19th February 2019 and its exhibits.
5. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.
6. *Witness statement of Sgt Andrew Scruton 0946 dated 6th March 2019 and exhibits.*

Statement of Truth

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

Signed *William Maxwell Hunt Rose* Dated 22 February 2019
Applicant's Solicitor

Full name William Maxwell Hunt Rose

Name of applicant's solicitor's firm Sharpe Pritchard LLP

Position or office held Partner
(if signing on behalf of firm or company)

11. Signature and address details

Signed *William Maxwell Hunt Rose* Dated 22 February 2019
Applicant's Solicitor

Position or office held Partner
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

Sharpe Pritchard LLP
Elm Yard
13-16 Elm Street
London
Postcode WC1X 0BJ

If applicable	
Phone no.	020 7405 4600
Fax no.	020 7831 1284
DX no.	353 London/Chancery Lane
Ref no.	WMHR/170.19

E-mail address wrose@sharpepritchard.co.uk

IN THE HIGH COURT OF JUSTICE

CLAIM NO:QB-2019-000616

QUEENS BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972, AND 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE DOVE

On the 22 day of February 2019

BETWEEN:

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



Claimants

-and-

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

Defendants

ORDER

UPON HEARING Counsel for the Claimants without notice to the Defendants

AND UPON reading the witness statement of Philip Richardson, Director of Arts Leisure and
Democracy at Nuneaton and Bedworth Borough Council

IT IS ORDERED THAT:

- 1. The application for the injunction shall be listed before a Judge on Tuesday 19 March
2019 at 10.30am, to allow three clear days between service of the proceedings and

the hearing date for the application for the interim injunction with a 2 hour time estimate.

2. Pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 the Claimants have permission to serve the Defendants between 6.30am and 8pm during the week and between 7am and 4pm on a Saturday. Copies (as opposed to originals) of claim forms and applications served on a Saturday will be deemed served on the second working day after the date of service and copies (as opposed to originals) of claim forms and applications served after 4pm on a working day shall be deemed served on the second working day after the date of service.
3. In the event that the Claimants are unable to personally serve any of the 1st to 53rd Defendants, pursuant to CPR Part 6.14 and 6.15 the Claimant shall be permitted to serve any such Defendants by leaving a copy (as opposed to an original) of the application notice, claim form, draft order, and supporting evidence, in a clear transparent envelope and affixing the same to a caravan, mobile home, or, other vehicle, or, the front door of any residential premises, which in each case is reasonably believed to be owned or occupied by the said Defendants, or, by putting such copy documents through the letter box of any such residential premises. Any such copy documents served by this method will be deemed served the second working day after service of the application notice and claim form.
4. The Claimants shall be permitted pursuant to CPR Part 6.27 to serve the evidence in support of the Claim and application for an interim injunction by USB memory stick and shall provide any Defendant that requests hard copies of the same within 2 working days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the First Claimant's offices at Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA between the hours of 10am and 4pm Monday to Friday excluding public holidays.
5. The claim form and application notice shall be deemed served on Persons Unknown (Second Defendant) pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 by serving a copy (as opposed to an original) of the claim form, application notice and draft order on

all 141 sites identified in Schedule 3 of this Order by affixing them in a prominent place on the Land with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from the First Claimant's offices at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA.

6. The Defendants shall acknowledge service of the claim form 21 days after the date of deemed service and file any written evidence in support of the Defence by the same date.
7. The Claimants have permission to serve the Defendants with a sealed copy of this Order (as opposed to an original).

QUEEN'S BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990

Before

On the

BETWEEN

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

Claimants

-and-

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

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

Defendants

Draft ORDER - INTERIM.

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 1-9 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:

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 [REDACTED]
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.

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

6. 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 a planning inspector
7. 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
8. 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.
9. 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.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. 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.
12. 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.
13. 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.
14. 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)
15. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. 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

19. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
20. 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.
21. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
22. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

23. 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 (redacted for service) .

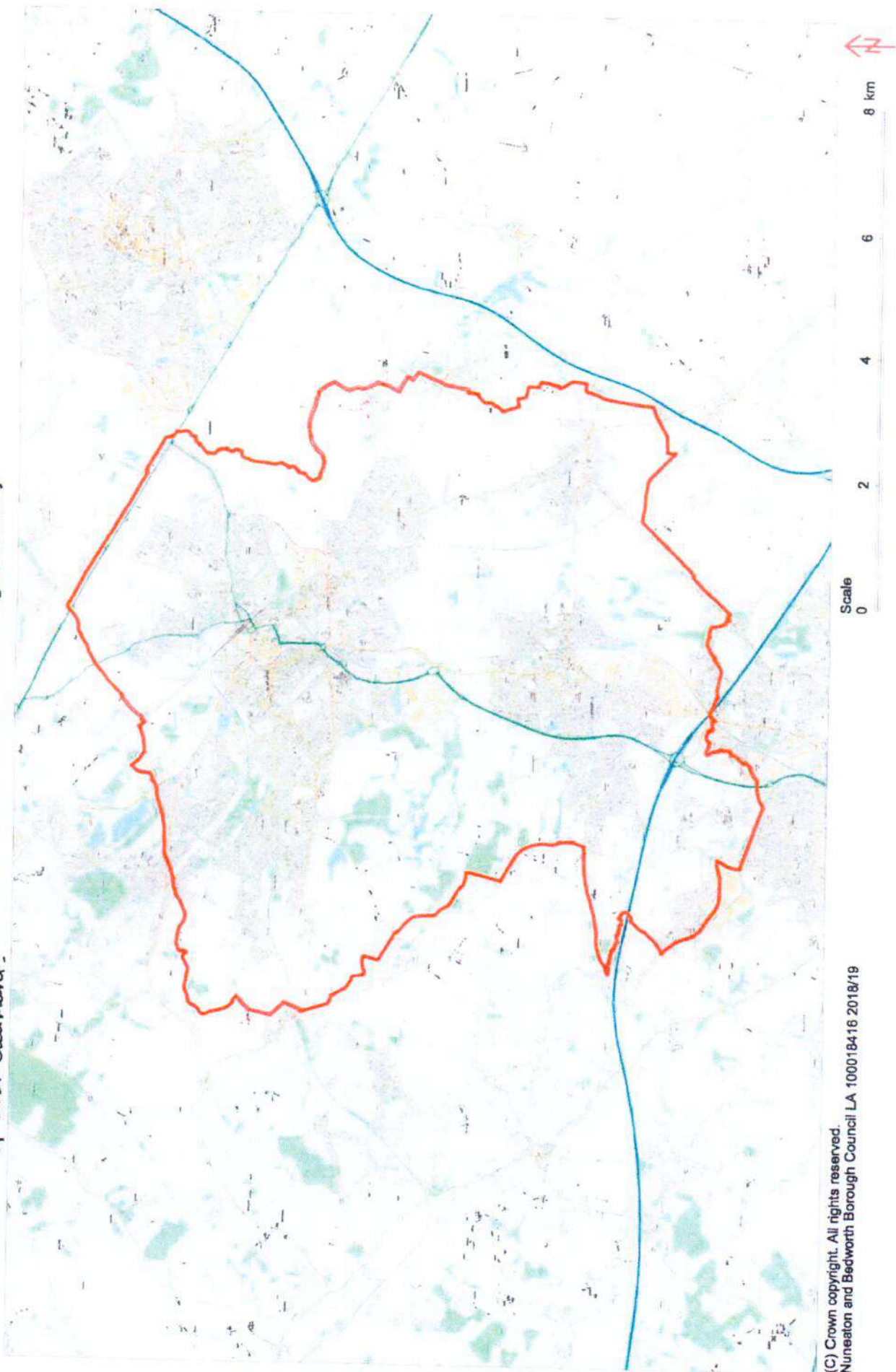
- (2) JESSICA DODD,
- (3) MICHAEL DOYLE
- (4) LUKE DELANEY
- (5) PATRICK McGINLEY,
- (6) ALPHONSUS McGINLEY
- (7) MICHAEL STOKES
- (8) MICHAEL STOKES
- (9) DENNIS STOKES
- (10) DENNIS STOKES (JNR)
- (11) BRIAN STOKES, 12a
- (12) JOHN MAUGHAN
- (13) TERRY MAUGHAN
- (14) TERRY MAUGHAN
- (15) PATRICK MAUGHAN
- (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

SCHEDULE 2 - Administrative Boundary
of First Claimant

Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA 100018416 2018/19

SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

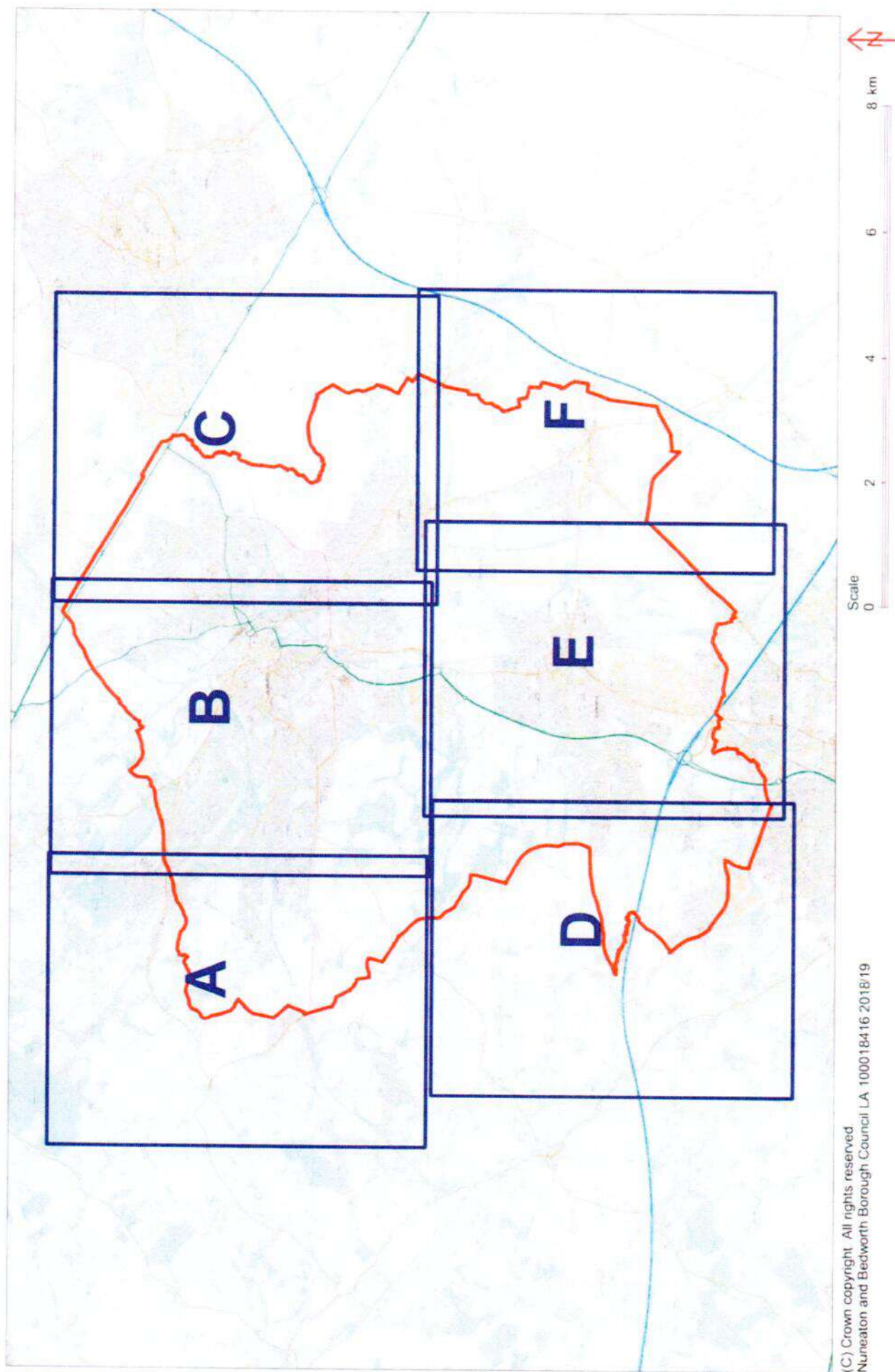
SITE NUMBER	SITE	>5 acres	POSTCODE	Land Owner	Title Number
1	Land on the north side of Corporation Street, Nuneaton	✓		NBBC	WK447699
2	Recreation ground lying to the north of Queens Road, Nuneaton	✓	CV11 5PZ	NBBC	WK446269
3	Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton	✓	CV11 5ET	NBBC	WK447951/ WK240784/ WK236363
4	Land being car park on the south west side of Corporation Street, Nuneaton	✓	CV11 5DG	NBBC	WK449599
5	Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ)	✓	CV11 5DE	NBBC	WK449585/ WK178804
6	Joinery works and adjacent premises fronting Regent Street, Nuneaton	✓	CV11 4BW	Private	WK3398436
7	Land on the west and east sides of Vicarage Street, Nuneaton	✓	CV11 5DB	NBBC	WK450184
8	Riversley Park Clinic, Cotton Road, Nuneaton (CV11 5TY)	✓	CV11 4BS	Private	WK366584
9	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	✓	CV11 5NE	NBBC	WK251517
10	Land at Church Street, Nuneaton	✓	CV11 4AS	NBBC	WK449976
11	Land and buildings lying to the East of Cotton Road	✓	CV11 5AA	NBBC	WK85582
12	Land at Vicarage Street, Nuneaton	✓	CV11 4AL	NBBC	WK426642
13	Land at Cotton Road, Nuneaton	✓	CV11 5AA	NBBC	WK450296
14	Meadow Court, Meadow Street, Nuneaton (CV11 5JE)	✓	CV11 5JF	NBBC	WK448678
15	Land to the south side of Bermuda Lane lying to the east and west of Coventry Road, Chivers Colliery 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	✓		NBBC	WK446511/ WK284250/ WK345991
16	Recreation Ground at Easyboro Way, Nuneaton	✓	CV11 4PY	NBBC	WK449338
17	Land on south side of Lutterworth Road, Nuneaton	✓	CV11 6QA	NBBC	WK449027
18	Land lying to the north east of Braemar Way, Nuneaton. Land on the south west and north east sides of Greenmoor Road & Land lying to the south east side of cleft road	✓	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
19	Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton	✓		NBBC	WK342561/ WK355952
20	Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC	WK447355
21	Land at Whitteford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road	✓	CV10 8PY	NBBC	WK130458/ WK447033
22	Land on the south side of Marston Lane, Nuneaton	✓	CV12 8DR	NBBC	WK448160
23	Land on the north side of Marston Lane, Bedworth	✓		NBBC	WK448256
24	Sparfields 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/ WK448601
25	Park Road (Car Park) - land on the east side of Park Road, Bedworth	✓	CV12 8LH	NBBC	WK448511
26	Barnacle Lane EA - land to the south of Barnacle Lane, Bukington, Bedworth, land at Barnacle Lane, Bukington, Bedworth	✓		NBBC	WK448611/ WK448624(part)
27	Land at Brewer Road, Bukington, Bedworth and land at Eustace Road, Bukington, Bedworth	✓	CV12 9RF	NBBC	WK448510/ WK448500
28	Recreation Ground, Bedworth Road, Bukington, Bedworth (CV12 9PZ)	✓	CV12 9LT	NBBC	WK449849
29	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 8DA	NBBC	WK439320
30	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden Avenue, Nuneaton	✓	CV10 9DJ	NBBC	WK448197/ WK448093
31	Land and buildings on the east side of Camp Hill Drive Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton	✓	CV10 9DE	NBBC	WK373679/ WK448013
32	Land on the south side of Willow Road, Nuneaton	✓		NBBC	WK447731
33	Land on the West side of Blackberry Lane, Bedworth	✓		NBBC	WK137139
34	Hockley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	✓	CV7 9EX	NBBC	WK450050
35	Land lying to the North East of Howat Road, Bedworth	✓	CV7 8NG	NBBC	WK24031
36	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry	✓		NBBC	WK336223
37	Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	✓	CV7 9GZ	NBBC	WK143991/ WK114857
38	Land on the east side of Bucks Hill, Nuneaton	✓	CV10 9TD	NBBC	WK350453
39	Land south-east of Hickman Road, Gailley Common, Nuneaton	✓	CV10 9SD	NBBC	WK339730

40	Nuneaton & North Works Group Riding for Disabled, Valley Road, Galleys Common (CV10 9NU) / land at Campbells Close, Nuneaton and land at Galleys Common, Nuneaton (CV10 9NU)	*	CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
41	Land on the south west side of Selby Way, land on the north side of Frenham Drive and land on the north east side of Merin Avenue, south east side of Freeland Rise, Whitford and land lying to the West of Bucks Hill	✓	CV10 9QF	NBBC	WK319146/ WK326554
42	Land on the east and west side of Sherbourne Avenue, Whitford	✓	-	NBBC	WK319145
43	Land on Galleys Common, Nuneaton, land at Galleys Common Nuneaton	✓	CV10 9PZ	NBBC	WK238447/ WK238145/ WK324522
44	Land on the south side of Pough Hill Road, Stockingford	*	CV10 9JH	NBBC	WK234444
45	Land on the south side of Sherbourne Avenue, Nuneaton	✓	CV12 0HD	NBBC	WK281821
46	Land on the south side of Cardigan Road, Bedworth	✓	CV12 0GE	Private	WK380708
47	Land and Buildings at Market End Farm and Orchard Farm, Smorral Lane	✓	CV12 0JP	NBBC	WK449987
48	Land at Smorral Lane, Bedworth	✓	CV10 BNN	NBBC	WK32497
49	Land on the North side of Anley Road, Stockingford	✓	CV10 9QG	NBBC	WK32497
50	Kingwood Road Rec - Land on the North side of Anley Road, Stockingford	*	CV10 9QJ	NBBC	WK448137/ WK448304/ WK317827
51	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	WK449032
52	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway	✓	CV12 8NW	NBBC	WK394575
53	Land lying to the West side of Blackhorse Road, Bedworth	*	CV6 6TE	Private	WK449032
54	Land on the North side of Bukington 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
55	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBC	WK449032
56	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	*	CV12 BNN	NBBC	WK449032
57	Bedworth Railway Station (Car Park) - Land on the north side of Bukington Road, Bedworth	*	CV12 8JT	NBBC	WK449032
58	Land at Albany Avenue, Bedworth	*	CV12 8JG	NBBC	WK366034
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	✓	CV12 0AL	NBBC	WK448598
60	Land on the north and south sides of Newdown Road, Nuneaton	✓	CV11 8EP	NBBC	WK295686/ WK460024/ WK448169/ WK317827
61	Land lying to the north of Butternere Avenue, Nuneaton	✓	-	NBBC	WK449846
62	Land at Horseton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	*	CV11 6YB	NBBC	WK210986
63	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	*	CV11 6JH	NBBC	WK336796/ WK344607
64	Recreation Ground, The Long Shool, Nuneaton, (CV11 6JH)	✓	CV11 6YI	NBBC	WK447654/ WK319282
65	Land at Horseton Grange and land to the south of Hinckley Road, Nuneaton	✓	-	NBBC	WK446886
66	Land on the east side of Chingbrook Close and land on the west and east side of Pallet Drive, Nuneaton	✓	CV10 0HG	NBBC	WK336796/ WK447654
67	Land on the south side of Church Lane, Nuneaton	✓	CV10 0HG	NBBC	WK345480/ WK309853
68	Land on the north side of Brookdale Road, Nuneaton and land on the north side of Ryde Avenue, Nuneaton	✓	CV10 DBN	NBBC	WK448958
69	Land at Bradestone Road, Nuneaton	*	-	NBBC	WK448590/ WK448091
70	Land on the north side of Donithorne Avenue, Nuneaton	✓	-	NBBC	WK450499
71	Land on the south side of Avenue Road, Nuneaton	✓	-	NBBC	WK452385
72	Land on the north side of Avenue Road, Nuneaton	✓	-	NBBC	WK452276
73	Land on the north side of Donithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	*	-	NBBC	WK449965
74	Land on the south-west side of Marlborough Road, Nuneaton	*	CV11 5HQ	NBBC	WK449842/ WK449819
75	Land at Donithorne 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	✓	CV11 4RE	NBBC	WK447475
76	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/ WK344972
77	Haversley Park, Cotton Road, Nuneaton	✓	CV11 5TY	NBBC	WK450286/ WK450173

78	Land at Sorrell Road, Nuneaton	✓	CV10 7AW	NBBC	WK452035
79	Riversley Park (Car Park) - Riversley Park, Cotton Road, Nuneaton	✗	CV11 5TX	NBBC	WK452080/WK450173
80	Land on the north side of Avenue Road, Nuneaton	✓	CV11 4LX	NBBC	WK448965
81	Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 6XA	NBBC	WK375915
82	Trinity Court Flats (Car Park), land on the West side of Highfield Road, Nuneaton	✗	CV11 4PW	NBBC	WK310067
83	Land at Alacria Crescent, Bedworth	✗		NBBC	WK448428
84	Land at Dunns Close, Nuneaton	✗		NBBC	WK453330
85	Land lying to the West of Blackhorse Road, Bedworth	✗		Private	WK394575
86	Aireborough Fields Farm, Nuneaton and Land at Singaby Close, Nuneaton	✗		WCC	WK271645/ WK453198
87	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC	WK470015/WK424958
88	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH)	✓	CV7 9AH	Private	WK461626
89	Race Leya Infant School, Bedworth	✗	CV12 8AD	WCC	Unregistered
90	Goodyers End County First School, Blowing Green Lane, Bedworth, (CV12 9HP)	✓	CV12 9HP	WCC	WK424335
91	All Saints Bedworth C of E Primary School and Nursery, Bedworth	✗	CV12 9HP	WCC	Unregistered
92	Land on the West side of Weston Lane, Blugington, Bedworth	✗	CV12 9RT	WCC	WK79471
93	Land and buildings on the South side of Denard Road, Bedworth	✗	CV12 8RT	Private	WK275063
94	Land lying to the East of Coventry Road, Bedworth	✗	CV7 9FJ	WCC	WK310092
95	Keresley Newland Primary Academy and Keresley Newland School, Grove Lane, Keresley, Coventry, (CV7 8LZ)	✓	CV7 8LZ	WCC	WK427632/WK477107
96	Land lying to the South of Smoral Lane, Goodyears End, Bedworth and Land lying to the South of Smoral Lane, Bedworth	✓	CV12 0HA	WCC	WK27604/WK114659
97	Wrenthorpe Lane Primary School, Ash Green, Coventry	✓	CV7 9HN	WCC	WK425267
98	St Francis Roman Catholic School, Nicholas Street, Bedworth	✗	CV12 8LN	Private	WK262596
99	Land on the East Side of Rye Piece Ringway, Bedworth	✓		Private	WK476476
100	Land on the East Side of Nicholas Street, Bedworth	✓		WCC	WK771388
101	Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV7 9NS	WCC	WK171647
102	St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PT)	✓	CV12 9PT	Private	WK461720
103	Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth, CV12 9PT	✓		Private	WK477270?
104	St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9QA)	✓	CV12 9QA	Private	WK479304
105	Land adjoining St Thomas More School, Greenmoor Road, Nuneaton, CV10 7EX	✓	CV10 7EX	Private	WK478015
106	St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX	✗		Private	WK477630
107	Arbury High School, Greenmoor Road, Nuneaton	✗	CV11 5EL	Private	WK233418
108	Abbey Cot E Infant School, Nuneaton	✗	CV10 7AT	WCC	Unregistered
109	All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)	✗	CV10 7AT	Private	WK461748
110	Land to the South of Tuttle Hill, Camp Hill, Nuneaton	✓	CV10 9QA	WCC	WK409218
111	Land lying to the South of Gipsy Lane, Nuneaton	✓	CV11 4SE	WCC	WK170501
112	Land at Judkins Quarry, Tuttle Hill, Nuneaton	✓	CV10 8HU	WCC	WK393091
113	Chilvers Cotton First School, Frank Street, Nuneaton (CV11 5RB)	✓	CV11 5HB	WCC	WK424955
114	Land lying to the west of Northumberland Avenue, Nuneaton	✓	CV10 BER	WCC	WK239413
115	Galley Common Infant School, Nuneaton	✓	CV10 9NZ	WCC	Unregistered
116	Land lying to the East of Higham Lane, Nuneaton	✓	CV11 6JS	WCC	WK205172
117	Land on the south side of Skye Close, Nuneaton	✓	CV10 7LW	WCC	WK176493
118	Middlemarch School, Nuneaton	✓	CV10 7BQ	WCC	Unregistered
119	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✗	CV10 8HW	WCC	WK426673
120	Land and buildings on the south side of St Paul's Road, Nuneaton	✗	CV11 5TY	WCC	WK380065
121	School at Cotton Road, Nuneaton	✗		Private	WK276511
122	Our Lady of the Angels Infant School and St Josephs RC First School, Cotton Road, Nuneaton, CV11 5TY	✓		Private	WK477543
123	Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton	✓	CV10 8NL	Private	WK470637
124	Land on the North Side of Ansley Road, Nuneaton	✓		Private	WK189776
125	Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR	✗		Private	WK471379
126	St Pauls C of E Primary School, Nuneaton	✗	CV10 BNH	Private	Unregistered
127	Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	✗	CV10 0JX	Private	WK480548
128	St Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX	✗		Private	WK449953
129	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	✗	CV11 4QH	Private	WK466047
130	Oakwood Secondary School, Morris Drive, Nuneaton	✗		Private	WK466048

121	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton, CV11 6HJ	*		CV11 6HJ	WCC	WK233776
122	Land on the East Side of Windemere Avenue, Nuneaton				WCC	WK473130
123	St Nicholas C of E First School, Windemere Avenue, Nuneaton, CV11 6HJ				Private	WK131856
124	Land lying to the North East of Oakdene Crescent, Nuneaton	✓		CV10 0DR	Private	WK473119
125	Land at George Eliot School, Ravelce Drive, Nuneaton, CV11 4QP	✓		CV11 4QP	WCC	WK150037/WK216447
126	Land on the North Side of Avenue Road, Nuneaton	✓		CV11 4LU	Private	WK458966
127	Etone College, Leicester Road, Nuneaton, CV11 6AA	✓		CV11 6AA	NBBG	WK448865
128	Hogham Lane School, Hogham Lane, Nuneaton, CV10 0BJ	✓		CV10 0BJ	WCC	WK425515
129	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓		CV11 4QH	Private	WK465311
130	Land lying on the South of Aldour Road, Nuneaton and Nuneaton Academy, North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓		CV10 7PD	WCC	WK468047/WK468048/WK233776
131	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓		CV11 4BE	WCC	WK175143/WK425489
132	Bedworth Health Nursery School, Giebe Avenue, Bedworth, CV12 0QP	✓		CV12 0QP	Private	WK438495
133	Excal Grange School and Science College, Wheelwright Lane, Bedworth	*			WCC	WK459742/WK497813
134	Excal Grange Special School, Wheelwright Lane, Coventry				WCC	WK426282
135	Land at Excal Grange School, Wheelwright Lane, Coventry, CV7 9AP	✓		CV7 9AP	Private	WK426690
136	Land on the South Side of Griff Lane, Nuneaton	✓		CV10 7SD	Private	WK450475
137	Land lying to the West of Leicester Road, Nuneaton	*		CV10 7SD	WCC	WK450903
138	Race Leys Middle School, Barton Road, Bedworth, CV12 8HG	✓		CV12 8HG	WCC	WK153444
139	Land and buildings on the south side of St Paul's Road, Nuneaton	✓		CV12 8HG	Private	WK240628
140	Stockingford Junior and Infant School, Grove Road, Nuneaton (CV10 8JN)	✓		CV10 8JN	WCC	WK465841
141	Land on the South West Side of Mayger Crescent, Nuneaton	*		CV11 4SQ	WCC	WK380085
142	Atterborough Mills, Atterborough Road, Nuneaton	✓		CV11 4SQ	WCC	WK41667
143	Manor Park Community School, Beaumont Road, Nuneaton	✓		CV11 5SS	Private	WK23140
144	139/152 Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓		CV10 7SD	Private	WK256088
145	140/141 Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓		CV11 5UT	Private	WK447590
146	141/142 Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓		CV10 7HU	Private	WK390614
147	Bermuda Road Community Centre, Bermuda Road, Nuneaton	✓		CV10 7HU	Private	WK424729

Key for traveller encampment maps



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A

Northwest Nuneaton



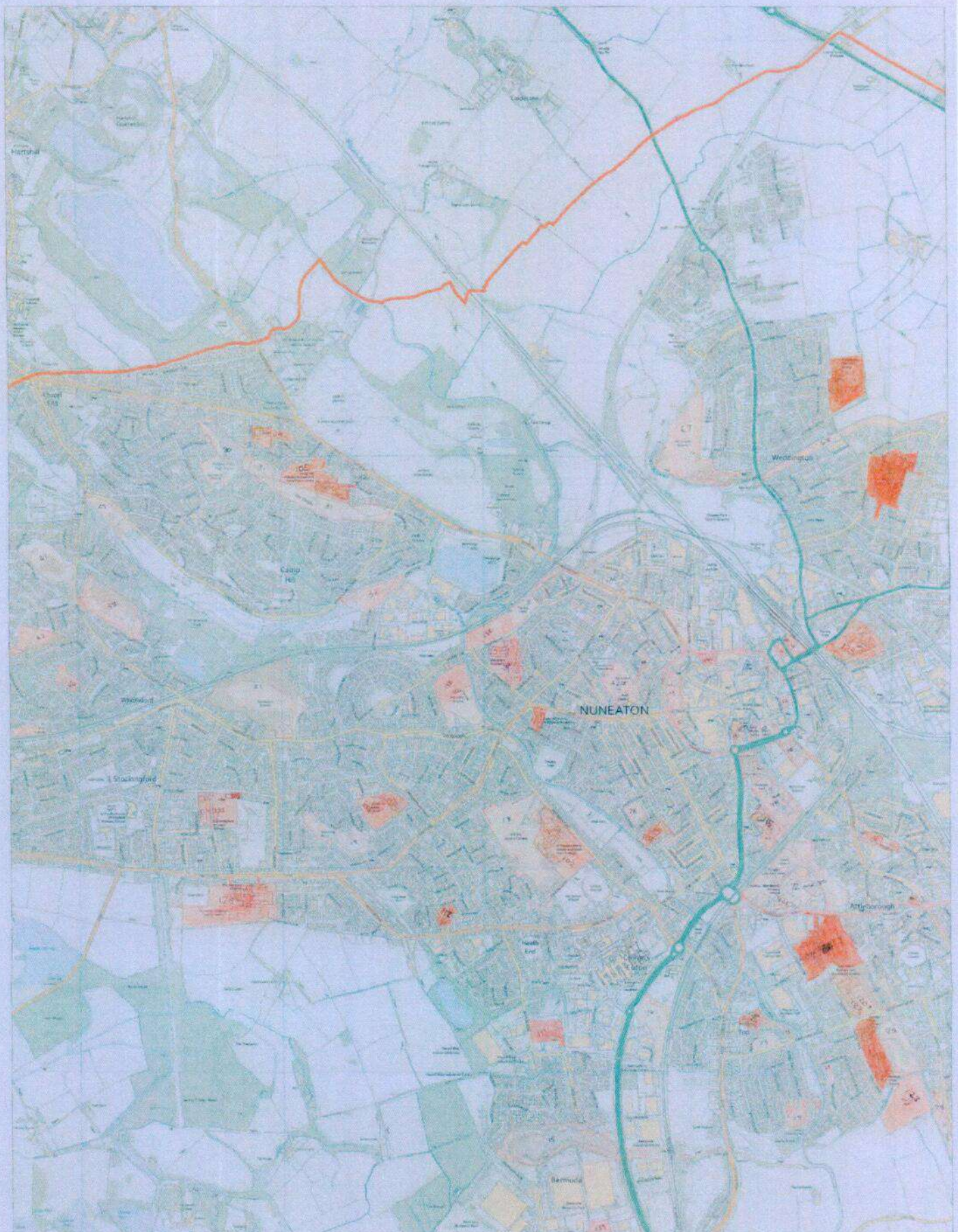
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100018416 2018/19

Scale
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B

North of Nuneaton

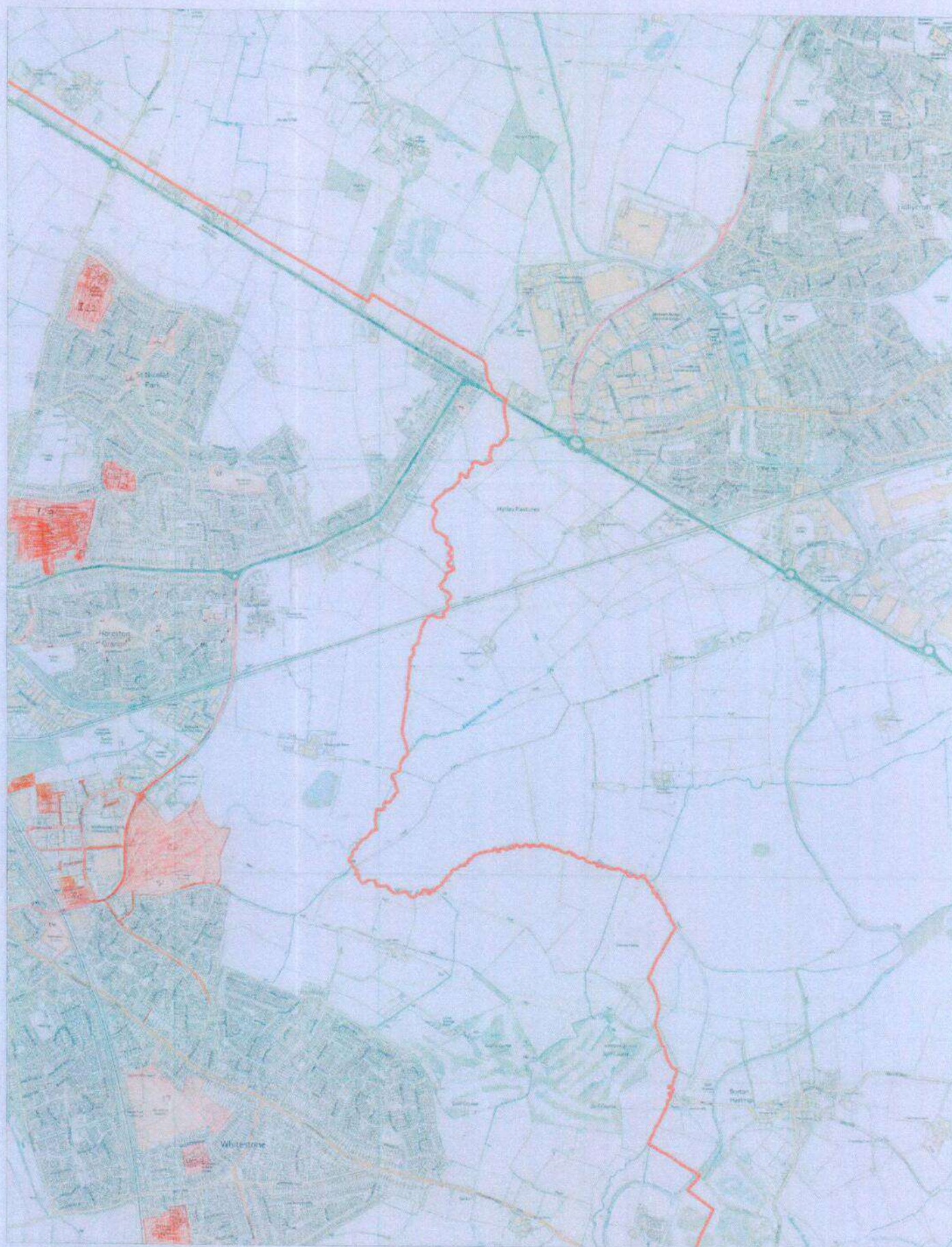


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Scale
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C

Northeast Nuneaton



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D

Southwest Bedworth



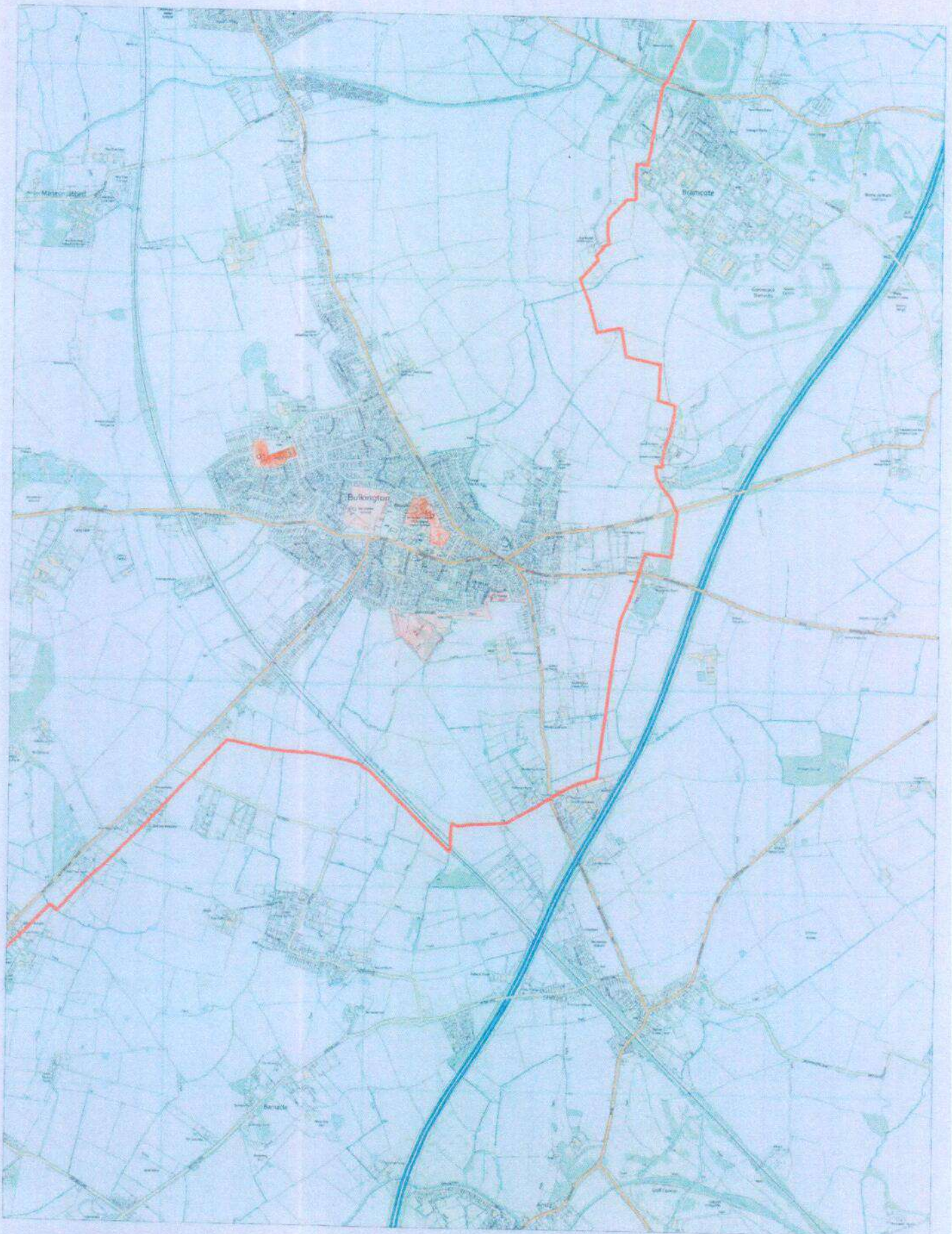
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Scale
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F

Southeast Bedworth



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100018416 2018/19

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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

On the

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

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

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

Defendants

Draft ORDER – ~~FINAL~~

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 CLAIM FOR THE FINAL INJUNCTION AND DISPOSAL OF THE CLAIM 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 1-9 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:

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 [REDACTED]
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.

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

6. 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 a planning inspector
7. 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
8. 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.
9. 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.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. 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.
12. 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.
13. 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.
14. 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)
15. Costs to be assessed in the sum of [ENTER SUM].

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. 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

19. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
20. 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.
21. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
22. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

23. 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).

Claimant
Alistair James Mellor
First
14th March 2019
"AJM1"

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 52 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

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

Defendants

WITNESS STATEMENT OF ALISTAIR JAMES MELLOR

I, Alistair James 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 I did Monday 11th March 2019 at 11.12 hrs attend 62 De Lacy Street, Ashton-on-ribble, Preston, Lancashire PR2 2DD, serve the defendant Mike McDonaugh with the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final, USB Stick containing evidence in support of claim and a covering letter from my instructing solicitors dated 4th March 2019, by placing said documents into a clearly addressed sealed envelope and posting it through the letterbox at 62 De Lacy Street, Ashton-on-ribble, Preston, Lancashire PR2 2DD. At the time of service, I was unable to elicit a response from within.

2. True copies of the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule

1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter from my instructing solicitors dated 4th March 2019, so served by me is now shown to me marked “AJM1”.

Statement of Truth

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

Signed: 
Alistair James Mellor

Dated: 14th March 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 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

"AJM1"

This is the exhibit marked "AJM1"

referred to in the Witness Statement of Alistair James Mellor

Statement of Truth

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

Signed: 

Alistair James Mellor

Dated: 14th March 2019



Mike McDonagh
62 De Lay Street
Ashton-on-ribble
Preston
Lancashire
PR2 2DD

Email: legal@nuneatonandbedworth.gov.uk

Date: 4 March 2019

Dear Sir/Madam

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

Nuneaton and Bedworth Borough Council & Warwickshire County Council have applied for an injunction in the above named proceedings against you. The Court will hear an application for the interim injunction on 19 March 2019 at the High Court, Queens Bench Division, Royal Courts of Justice, Strand, London.

By order of His Honour Justice Dove dated 22 February 2019, please find attached:

1. Part 8 Claim Form dated 22 February 2019
2. Application for Injunction dated 22 February 2019
3. Order of HHJ Dove for alternative service dated 22 February 2019
4. Draft Interim Injunction Order and attached Schedules to be applied for at the hearing on 19th March 2019
5. Draft Final Order together with Schedules
6. USB Stick containing evidence in support of claim.

The implications of the proposed Interim Order are contained within and include an application for a power of arrest if you are found to be encamped anywhere in the Borough as per Schedule 2 or on any of the sites as per Schedule 3.

A hard copy of the evidence in support of the claim will be provided within 2 working days of receipt of such request.

The documents forming part of this injunction application can also 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).

Yours faithfully,

For and on behalf of Nuneaton and Bedworth Borough Council



Claim Form (CPR Part 8)

CLAIMANT'S COPY

In the High Court of Justice

Queen's Bench Division

Claim no. QB-2019-000616

Fee Account no.

Help with Fees -
Ref no. (if applicable)

H W F - - -

Claimant

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL
Town Hall, Coton Rd, Nuneaton CV11 5AA

(2) WARWICKSHIRE COUNTY COUNCIL
Shire Hall, Warwick CV34 4RL



Assigned to Master McCloud

Defendant(s)

(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

See attached for further details

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 Claimants seeks an injunction to protect the First Claimant's administrative area from further unauthorised encampments by the First to Fifty-Third Defendants, 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, [REDACTED]
[REDACTED]
[REDACTED]

See attached for further details

Court fee

£ 528.00

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.

Claim no.

QB-2019-000616

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 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

Statement of Truth

~~*(I believe)~~ (The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement.

Full name William Maxwell Hunt Rose

Name of claimant's legal representative's firm Sharpe Pritchard LLP

signed 

*(Claimant) ~~(Litigation friend)~~
(Legal representative)

position or office held Partner
(if signing on behalf of firm or company)

**delete as appropriate*

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.

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>

Application Notice

For help in completing this form please read the notes for guidance form N244 Notes

NOTICE OF HEARING
APPLICATION WILL BE HEARD AT THE
ROYAL COURTS OF JUSTICE, STRAND, LONDON
WC2A 2LL
DATE 19/3/19
TIME TBC
IN A COURT TO BE CONFIRMED

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.)	Nuneaton & Bedworth Borough Council and Warwickshire County Council
Defendants (including ref.)	(1) Thomas Corcoran & Ors
Date	22 February 2019



1. What is your name or, if you are a solicitor, 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 injunction in the terms of the draft Order attached for the reasons set out in the witness statements of Robert Watson, Martyn Stephens, Katherine Moreton, Philip Richardson and Carol Ingleston and their exhibits.

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?
2 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. Witness statement of Robert Watson dated 15th February 2019 and its exhibits.
2. Witness statement of Martyn Stephens dated 19th February 2019 and its exhibits. x 2
3. Witness statement of Katherine Ann Moreton dated 19th February 2019 and its exhibits.
4. Witness statement of Philip Richardson dated 19th February 2019 and its exhibits.
5. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.
6. *Witness statement of Sgt Andrew Scruton 0946 dated 6th March 2019 and exhibits.*

Statement of Truth

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

Signed *William M. Rose* Dated 22 February 2019
Applicant's Solicitor

Full name William Maxwell Hunt Rose

Name of applicant's solicitor's firm Sharpe Pritchard LLP

Position or office held Partner
(if signing on behalf of firm or company)

11. Signature and address details

Signed *William M. Rose* Dated 22 February 2019
Applicant's Solicitor

Position or office held Partner
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

Sharpe Pritchard LLP
Elm Yard
13-16 Elm Street
London

Postcode WC1X 0BJ

If applicable	
Phone no.	020 7405 4600
Fax no.	020 7831 1284
DX no.	353 London/Chancery Lane
Ref no.	WMHR/170.19

E-mail address wrose@sharpepritchard.co.uk

IN THE HIGH COURT OF JUSTICE

CLAIM NO:QB-2019-000616

QUEENS BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972, AND 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE DOVE

On the 22 day of February 2019

BETWEEN:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL



Claimants

-and-

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

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

Defendants

ORDER

UPON HEARING Counsel for the Claimants without notice to the Defendants

AND UPON reading the witness statement of Philip Richardson, Director of Arts Leisure and
Democracy at Nuneaton and Bedworth Borough Council

IT IS ORDERED THAT:

1. The application for the injunction shall be listed before a Judge on Tuesday 19 March
2019 at 10.30am, to allow three clear days between service of the proceedings and

the hearing date for the application for the interim injunction with a 2 hour time estimate.

2. Pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 the Claimants have permission to serve the Defendants between 6.30am and 8pm during the week and between 7am and 4pm on a Saturday. Copies (as opposed to originals) of claim forms and applications served on a Saturday will be deemed served on the second working day after the date of service and copies (as opposed to originals) of claim forms and applications served after 4pm on a working day shall be deemed served on the second working day after the date of service.
3. In the event that the Claimants are unable to personally serve any of the 1st to 53rd Defendants, pursuant to CPR Part 6.14 and 6.15 the Claimant shall be permitted to serve any such Defendants by leaving a copy (as opposed to an original) of the application notice, claim form, draft order, and supporting evidence, in a clear transparent envelope and affixing the same to a caravan, mobile home, or, other vehicle, or, the front door of any residential premises, which in each case is reasonably believed to be owned or occupied by the said Defendants, or, by putting such copy documents through the letter box of any such residential premises. Any such copy documents served by this method will be deemed served the second working day after service of the application notice and claim form.
4. The Claimants shall be permitted pursuant to CPR Part 6.27 to serve the evidence in support of the Claim and application for an interim injunction by USB memory stick and shall provide any Defendant that requests hard copies of the same within 2 working days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the First Claimant's offices at Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA between the hours of 10am and 4pm Monday to Friday excluding public holidays.
5. The claim form and application notice shall be deemed served on Persons Unknown (Second Defendant) pursuant to CPR Part 6.14, 6.15, 6.27 and 6.27 by serving a copy (as opposed to an original) of the claim form, application notice and draft order on

all 141 sites identified in Schedule 3 of this Order by affixing them in a prominent place on the Land with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from the First Claimant's offices at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA.

6. The Defendants shall acknowledge service of the claim form 21 days after the date of deemed service and file any written evidence in support of the Defence by the same date.
7. The Claimants have permission to serve the Defendants with a sealed copy of this Order (as opposed to an original).

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

On the

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

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

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

Defendants

Draft ORDER - INTERIM.

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 1-9 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:

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 [REDACTED]
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.

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

6. 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 a planning inspector
7. 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
8. 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.
9. 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.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. 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.
12. 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.
13. 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.
14. 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)
15. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. 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

19. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
20. 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.
21. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
22. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

23. 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 (redacted for service) .

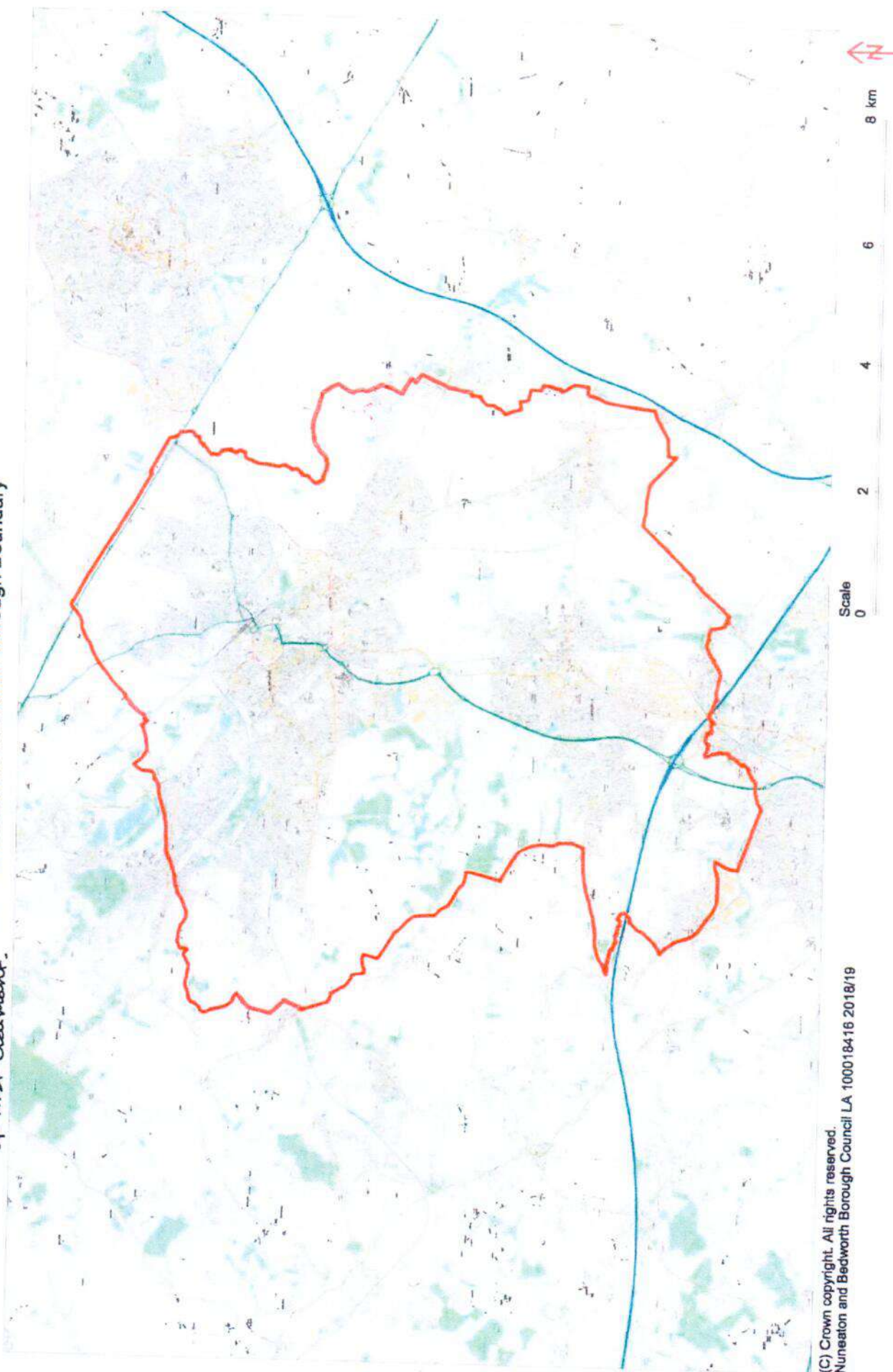
- (2) JESSICA DODD,
- (3) MICHAEL DOYLE
- (4) LUKE DELANEY
- (5) PATRICK McGINLEY,
- (6) ALPHONSUS McGINLEY
- (7) MICHAEL STOKES
- (8) MICHAEL STOKES
- (9) DENNIS STOKES
- (10) DENNIS STOKES (JNR)
- (11) BRIAN STOKES, 12a
- (12) JOHN MAUGHAN
- (13) TERRY MAUGHAN
- (14) TERRY MAUGHAN
- (15) PATRICK MAUGHAN
- (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

SCHEDULE 2 - Administrative Boundaries
of First Claimant.

Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA 100018416 2018/19

SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

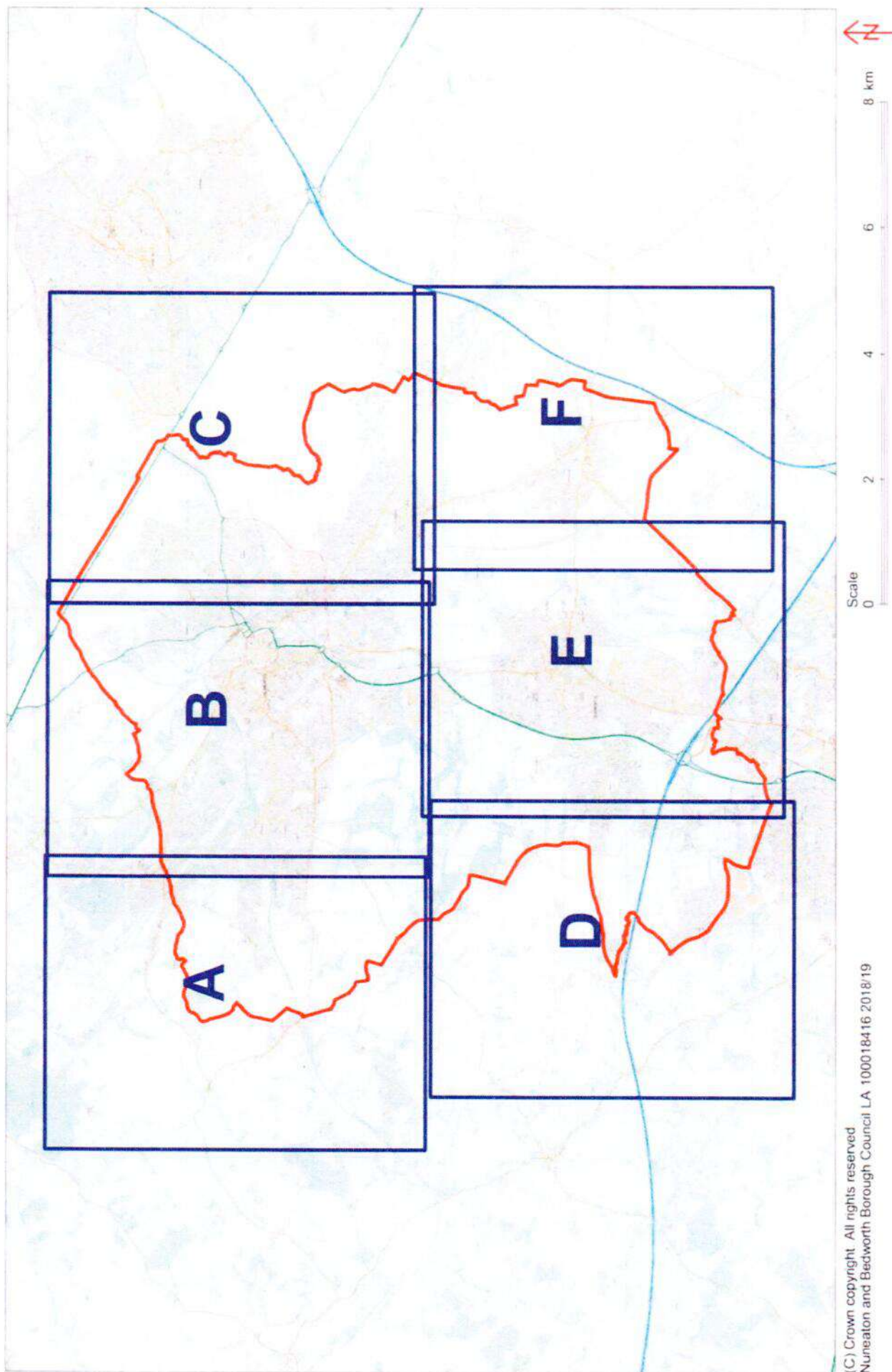
SITE NUMBER	SITE	POSTCODE	Land Owner	Title Number
1	Land on the north side of Corporation Street, Nuneaton	CV11 9PZ	NBBC	WK447699
2	Recreation ground lying to the north of Queens Road, Nuneaton	CV11 9PZ	NBBC	WK446269
3	Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton	CV11 9ET	NBBC	WK447951/ WK240764/ WK236363
4	Land being car park on the south west side of Corporation Street, Nuneaton	CV11 5DQ	NBBC	WK449599
5	Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ)	CV11 5QE	NBBC	WK445585/ WK178604
6	Joinery works and adjacent premises fronting Regent Street, Nuneaton	CV11 4BW	Private	WK398436
7	Land on the west and east sides of Vicarage Street, Nuneaton	CV11 5DB	NBBC	WK450184
8	Riversley Park Clinic, Cotton Road, Nuneaton (CV11 5TY)	CV11 4BS	Private	WK366584
9	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	CV11 5NE	NBBC	WK251517
10	Land at Church Street, Nuneaton	CV11 4AS	NBBC	WK449978
11	Land and buildings lying to the East of Cotton Road	CV11 5AA	NBBC	WK88582
12	Land at Vicarage Street, Nuneaton	CV11 4AL	NBBC	WK426642
13	Land at Cotton Road, Nuneaton	CV11 5AA	NBBC	WK450296
14	Meadow Court, Meadow Street, Nuneaton (CV11 5JE)	CV11 5JP	NBBC	WK448678
15	Land to the south side of Bermuda Road lying to the east and west of Coventry Road, Oliver's Colliery and 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	CV11 4PY	NBBC	WK449338
16	Recreation Ground at Easyboro Way, Nuneaton	CV11 6QA	NBBC	WK449027
17	Land on south side of Lutterworth Road, Nuneaton	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
18	Land lying to the north east of Blarney Way, Nuneaton. Land on the south west and north east sides of Greenmoor Road & Land lying to the south east side ofcroft road	CV10 7EL	NBBC	WK342561/ WK355952
19	Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton	CV10 8DS	NBBC	WK447355
20	Land at Recreation Ground, Tomkinson Road, Nuneaton	CV10 8PY	NBBC	WK130458/ WK447033
21	Land at Whitelield Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road	CV12 8DR	NBBC	WK448160
22	Land on the south side of Marston Lane, Nuneaton	CV12 8NF	NBBC	WK448256
23	Land on the north side of Marston Lane, Bedworth	CV12 8NF	NBBC	WK448876/ WK246825/ WK448601
24	Sparfields 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 8LH	NBBC	WK448511
25	Park Road (Car Park) - land on the east side of Park Road, Bedworth	CV12 8LH	NBBC	WK448611/ WK448624(part)
26	Barnacle Lane EA - land to the south of Barnacle Lane, Bedworth, Bedworth, land at Barnacle Lane, Bedworth, Bedworth	CV12 9RF	NBBC	WK448510/ WK448500
27	Land at Brewer Road, Bedworth, Bedworth and land at Eustace Road, Bedworth	CV12 9LT	NBBC	WK449849
28	Recreation Ground, Bedworth Road, Bedworth, (CV12 9PZ)	CV10 8DA	NBBC	WK429320
29	Land on the south west side of Queen Elizabeth Road, Nuneaton	CV10 8DA	NBBC	WK448197/ WK448093
30	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden Avenue, Nuneaton	CV10 8DJ	NBBC	WK373679/ WK448013
31	Land and buildings on the east side of Camp Hill Drive Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton	CV10 8OE	NBBC	WK447731
32	Land on the south side of Willow Road, Nuneaton	CV10 8OE	NBBC	WK137139
33	Land on the West side of Blackberry Lane, Bedworth	CV10 8OE	NBBC	WK450090
34	Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	CV10 8OE	NBBC	WK450090
35	Land lying to the North East of Howat Road, Bedworth	CV10 8OE	NBBC	WK124031
36	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry	CV10 8OE	NBBC	WK336223
37	Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	CV10 8OE	NBBC	WK143991/ WK154857
38	Land on the east side of Bucks Hill, Nuneaton	CV10 9TD	NBBC	WK358453
39	Land and south-east of Hickman Road, Galsley Common, Nuneaton	CV10 9SD	NBBC	WK339730

40	Nuneaton & North Warwick Group Riding for Disabled, Valley Road, Galleys Common (CV10 9NU) / land at Campbell Close, Nuneaton and land at Galleys Common, Nuneaton (CV10 9NU)	*		CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
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 Merion Avenue, south east side of Frensham Rise, Whiteford and land lying to the West of Bucks Hill	✓		CV10 9QF	NBBC	WK319146/ WK326554
42	Land on the east and west side of Sherbourne Avenue, Whiteford Nuneaton	✓		-	NBBC	WK319145
43	Land on Galleys Common, Nuneaton, land at Galleys Common Nuneaton	✓		CV10 9PZ	NBBC	WK238447/ WK238145/ WK324522
44	Land on the south side of Plough Hill Road, Stockingford	✓		CV10 9JH	NBBC	WK234444
45	Land on the south side of Caniguan Road, Bedworth	✓		CV12 0HD	NBBC	WK281821
46	Land and Buildings at Market End Farm and Orchard Farm, Smorral Lane	✓		CV12 0GE	Private	WK380708
47	Land at Smorral Lane, Bedworth	✓		CV12 0GP	NBBC	WK449987
48	Land on the North side of Ansley Road, Stockingford	✓		CV10 8NN	NBBC	WK32497
49	Kingswood Road Rec - Land on the North side of Ansley Road, Stockingford	*		CV10 9QG	NBBC	WK32497
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	✓		CV10 8JA	NBBC	WK448137/ WK448304/ WK317827
51	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓		CV12 8NW	NBBC	WK449032
52	Land lying to the West side of Blackhorse Road, Bedworth	✓		CV12 8JT	NBBC	WK394575
53	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 8JG	NBBC	WK169700/ WK448169/ WK250992/ WK448429
54	Miners Welfare Park (Car Park), Miners Welfare Park, Rye Piece Ringway, Bedworth	✓		CV12 8JT	NBBC	WK449032
55	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	*		CV12 8NN	NBBC	WK449032
56	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	*		CV12 8JT	NBBC	WK449032
57	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	*		CV12 8JG	NBBC	WK366034
58	Land at Arbury Avenue, Bedworth	*			NBBC	WK448598
59	Land lying to the east of Anso 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/ WK448159/ WK317827
60	Land on the north and south sides of Newdown Road, Nuneaton	*		CV12 DAL	NBBC	WK448846
61	Land lying to the north of Buttermere Avenue, Nuneaton	✓		CV11 6EP	NBBC	WK210986
62	Land at Horsdon Grange, Nuneaton and land lying south and west of Camlome Drive, Nuneaton	*			NBBC	WK336798/ WK344607
63	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clevely Way	*		CV11 6YB	NBBC	WK447654/ WK319282
64	Recreation Ground, The Long Shod, Nuneaton, (CV11 6JH)	*		CV11 6JH	NBBC	WK448888
65	Land at Horsdon Grange and land to the south of Hinckley Road, Nuneaton	✓		CV11 6YL	NBBC	WK336798/ WK447654
66	Land on the east side of Changebrook Close and land on the west and east side of Pallet Drive, Nuneaton	✓		-	NBBC	WK341480/ WK309853
67	Land on the south side of Church Lane, Nuneaton	✓		CV10 9HG	NBBC	WK448958
68	Land on the north side of Brookdale Road, Nuneaton and land on the North side of Rye Avenue, Nuneaton	✓		CV10 8BN	NBBC	WK448096/ WK448091
69	Land at Bradestone Road, Nuneaton	*			NBBC	WK450499
70	Land on the north side of Donithorne Avenue, Nuneaton	*			NBBC	WK452385
71	Land on the south side of Avenue Road, Nuneaton	✓			NBBC	WK452276
72	Land on the north side of Avenue Road, Nuneaton	✓			NBBC	WK448965
73	Land on the north side of Donithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	*			NBBC	WK448942/ WK448919
74	Land on the south west side of Marlborough Road, Nuneaton	*		CV11 6PQ	NBBC	WK447475
75	Land at Donithorne Avenue, Nuneaton, land lying to the east of Havelock Drive, Nuneaton, land on the east side of Marston Lane, Nuneaton and land on the east and west sides of Marston Lane, Nuneaton	✓		CV11 6RE	NBBC	WK452370/ WK452349/ WK449456/ WK449734
76	Land lying on the north side of St Georges Way, Nuneaton and land on the north side of St Georges Way, Chivers Cotton	✓		CV10 7BX	NBBC	WK448537/ WK344972
77	Roversley Park, Cotton Road, Nuneaton	✓		CV11 5TY	NBBC	WK450206/ WK450173

78. Land at Sorrel Road, Nuneaton	✓	CV10 7AW	NBBC	WK450035	NBBC	WK450035
79. Riverside Park (Car Park) - Riverside Park, Cotton Road, Nuneaton	✓	CV11 5TX	NBBC	WK450206/WK450173	NBBC	WK450206/WK450173
80. Land on the north side of Avenue Road, Nuneaton	✓	CV11 4LA	NBBC	WK448965	NBBC	WK448965
81. Land lying to the east of Eastons Way, Nuneaton	✓	CV11 6XA	NBBC	WK370915	NBBC	WK370915
82. Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	✓	CV11 4PW	NBBC	WK310067	NBBC	WK310067
83. Land at Aqualia Crescent, Bedworth	✓		NBBC	WK448428	NBBC	WK448428
84. Land at Dennis Close, Nuneaton	✓		NBBC	WK452130	NBBC	WK452130
85. Land lying to the West of Blackhorse Road, Bedworth	✓		Private	WK394575	Private	WK394575
86. Anebrough Fields Farm, Nuneaton and Land at Singaby Close, Nuneaton	✓		WCC	WK371645/WK451358	WCC	WK371645/WK451358
87. Nicholas Chamberlaine School, Buckingham Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC	WK470015/WK424958	WCC	WK470015/WK424958
88. Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AU)	✓	CV7 9AH	Private	WK463626	Private	WK463626
89. Race Leys Infant School, Bedworth	✓	CV12 8AD	WCC	Unregistered	WCC	Unregistered
90. Goodbyes End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)	✓	CV12 0HP	WCC	WK424315	WCC	WK424315
91. All Saints, Bedworth C of E Primary School and Nursery, Bedworth	✓	CV12 9HP	WCC	Unregistered	WCC	Unregistered
92. Land on the West side of Weston Lane, Buckingham, Bedworth	✓	CV12 9RT	WCC	WK79471	WCC	WK79471
93. Land and buildings on the South side of Denwood Road, Bedworth	✓	CV12 8RT	Private	WK275063	Private	WK275063
94. Land lying to the East of Coventry Road, Bedworth	✓	CV7 9FJ	WCC	WK31002	WCC	WK31002
95. Keresley Newland Primary Academy and Keresley Newland School, Grove Lane, Keresley, Coventry, (CV7 8JZ)	✓	CV7 8JZ	WCC	WK427632/WK477207	WCC	WK427632/WK477207
96. Land lying to the South of Smidral Lane, Goodbyes End, Bedworth and Land lying to the South of Smidral Lane, Bedworth	✓	CV12 0HA	WCC	WK27604/WK134659	WCC	WK27604/WK134659
97. Wheelwright Lane Primary School, Ash Green, Coventry	✓	CV7 9HN	WCC	WK425167	WCC	WK425167
98. St Francis Roman Catholic School, Nicholas Street, Bedworth	✓	CV12 8JN	Private	WK262596	Private	WK262596
99. Land lying to the North of Rye Piece Ringway, Bedworth	✓		Private	WK476476	Private	WK476476
100. Land on the East Side of Nicholas Street, Bedworth	✓		WCC	WK171388	WCC	WK171388
101. Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV7 9NS	WCC	WK171647	WCC	WK171647
102. St James Church of England Junior School, Barbridge Road, Buckingham, Bedworth (CV12 9PF)	✓	CV12 9PF	Private	WK461720	Private	WK461720
103. Playing fields at St James Church of England Junior School, Barbridge Road, Buckingham, Bedworth, CV12 9PF	✓		Private	WK427207	Private	WK427207
104. St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9DA)	✓	CV12 9DA	Private	WK479304	Private	WK479304
105. Land adjoining St Thomas More School, Greenmoor Road, Nuneaton, CV10 7EX	✓	CV10 7EX	Private	WK478035	Private	WK478035
106. St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX	✓		Private	WK477630	Private	WK477630
107. Abbey High School, Greenmoor Road, Nuneaton	✓		Private	WK233418	Private	WK233418
108. All Saints C of E Primary School & Nursery, Knebly Crescent, Nuneaton (CV10 7AT)	✓	CV11 5EL	WCC	Unregistered	WCC	Unregistered
109. Land to the South of Tuttle Hill, Camp Hill, Nuneaton	✓	CV10 7AT	Private	WK461148	Private	WK461148
110. Land lying to the South of Gypsy Lane, Nuneaton	✓	CV10 9QA	WCC	WK409718	WCC	WK409718
111. Land at Jodins Quarry Tuffie Hill, Nuneaton	✓	CV11 4SE	WCC	WK170501	WCC	WK170501
112. Chivers Cotton First School, Frank Street, Nuneaton (CV11 5RB)	✓	CV10 0HU	WCC	WK393091	WCC	WK393091
113. Land lying to the west of Northumberland Avenue, Nuneaton	✓	CV11 5RB	WCC	WK424955	WCC	WK424955
114. Galley Common Infant School, Nuneaton	✓	CV10 8ER	WCC	WK239433	WCC	WK239433
115. Land lying to the East of Hingham Lane, Nuneaton	✓	CV10 9AZ	WCC	Unregistered	WCC	Unregistered
116. Land on the south side of Skye Close, Nuneaton	✓	CV11 6JS	WCC	WK205172	WCC	WK205172
117. Middlemarch School, Nuneaton	✓	CV10 7LW	WCC	WK178493	WCC	WK178493
118. Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 7BQ	WCC	Unregistered	WCC	Unregistered
119. Land and buildings on the south side of St Paul's Road, Nuneaton	✓	CV10 8HW	WCC	WK426473	WCC	WK426473
120. School at Cotton Road, Nuneaton	✓		WCC	WK330085	WCC	WK330085
121. Our Lady of the Angels Infant School and St Josephs RC First School, Cotton Road, Nuneaton, CV11 5TY	✓	CV11 5TY	Private	WK276511	Private	WK276511
122. Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton	✓	CV10 8NL	Private	WK477441	Private	WK477441
123. Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 4JB	✓		Private	WK470637	Private	WK470637
124. St Pauls C of E Primary School, Nuneaton	✓		Private	WK189716	Private	WK189716
125. Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	✓	CV10 8BH	Private	WK471179	Private	WK471179
126. St Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX	✓	CV10 0JX	Private	WK480948	Private	WK480948
127. Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	✓		Private	WK449953	Private	WK449953
128. Oakwood Secondary School, Morris Drive, Nuneaton	✓	CV11 4QH	Private	WK448047	Private	WK448047
129. Oakwood Secondary School, Morris Drive, Nuneaton	✓		Private	WK458048	Private	WK458048

121	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	✓			CV11 8HJ	WCC	WX233776
121	Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 8HJ	✓	✗			WCC	WX271130
121	Land on the East Side of Windemere Avenue, Nuneaton	✓				Private	WX131856
121	St Nicholas C of E First School, Windemere Avenue, Nuneaton, CV11 8HJ	✓				Private	WX473119
122	Land lying to the North East of Oakdene Crescent, Nuneaton	✓			CV10 0DR	WCC	WX149033/WX216447
123	Land at George Eliot School, Havelock Drive, Nuneaton, CV11 4QP	✓			CV11 4QP	Private	WX558966
124	Land on the North Side of Avenue Road, Nuneaton	✓			CV11 4LU	NBBC	WX448965
125	Elm College, Leicester Road, Nuneaton, CV11 6AA	✓			CV11 6AA	WCC	WX435515
126	Higham Lane School, Higham Lane, Nuneaton, CV10 0BU	✓			CV10 0BU	Private	WX665331
127	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4	✓			CV11 4QH	WCC	WX666047/WX466048/WX233776
128	Land lying on the South of Aubrey Road, Nuneaton and Nuneaton Academy	✓			CV10 7PD	WCC	WX175243/WX425489
129	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓			CV11 6BH	Private	WX228695
130	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓			CV11 4BE	Private	WX497842/WX497832
131	Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0GP	✗			CV12 0GP	WCC	WX26282
132	Exhall Grange School and Science College, Wheelwright Lane, Bedworth	✓				WCC	WX426690
132	Exhall Grange Special School, Wheelwright Lane, Coventry	✓				Private	WX440475
133	Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP	✓			CV7 9HP	Private	WX450903
133	North Side of Griff Lane, Nuneaton	✓			CV10 7SD	WCC	WX165844
134	Land lying to the West of Leicester Road, Nuneaton	✗			CV12 8AG	WCC	WX140628
134	Race Loke Middle School, Barton Road, Bedworth, CV12 8HG	✓			CV12 8HG	Private	WX465841
135	Land and buildings on the south side of St Paul's Road, Nuneaton	✓			CV10 6UH	WCC	WX180085
135	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JH)	✓			CV10 8JH	WCC	WX42667
136	Land on the South West Side of Manger Crescent, Nuneaton	✗			CV11 4SQ	WCC	WX23140
137	Atterborough Mills, Atterborough Road, Nuneaton	✗				Private	WX256088
138	Manor Park Community School, Beaumont Park, Nuneaton	✗			CV11 5SS	Private	WX430022
139	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓			CV10 7SD	Private	WX447390
140	Halfords - land and buildings on the south side of Newtown Road, Nuneaton	✗			CV11 5UT	Private	WX390614
141	Bermuda Road Community Centre, Bermuda Road, Nuneaton	✓			CV10 7HL	Private	WX474779

Key for traveller encampment maps



A

Northwest Nuneaton



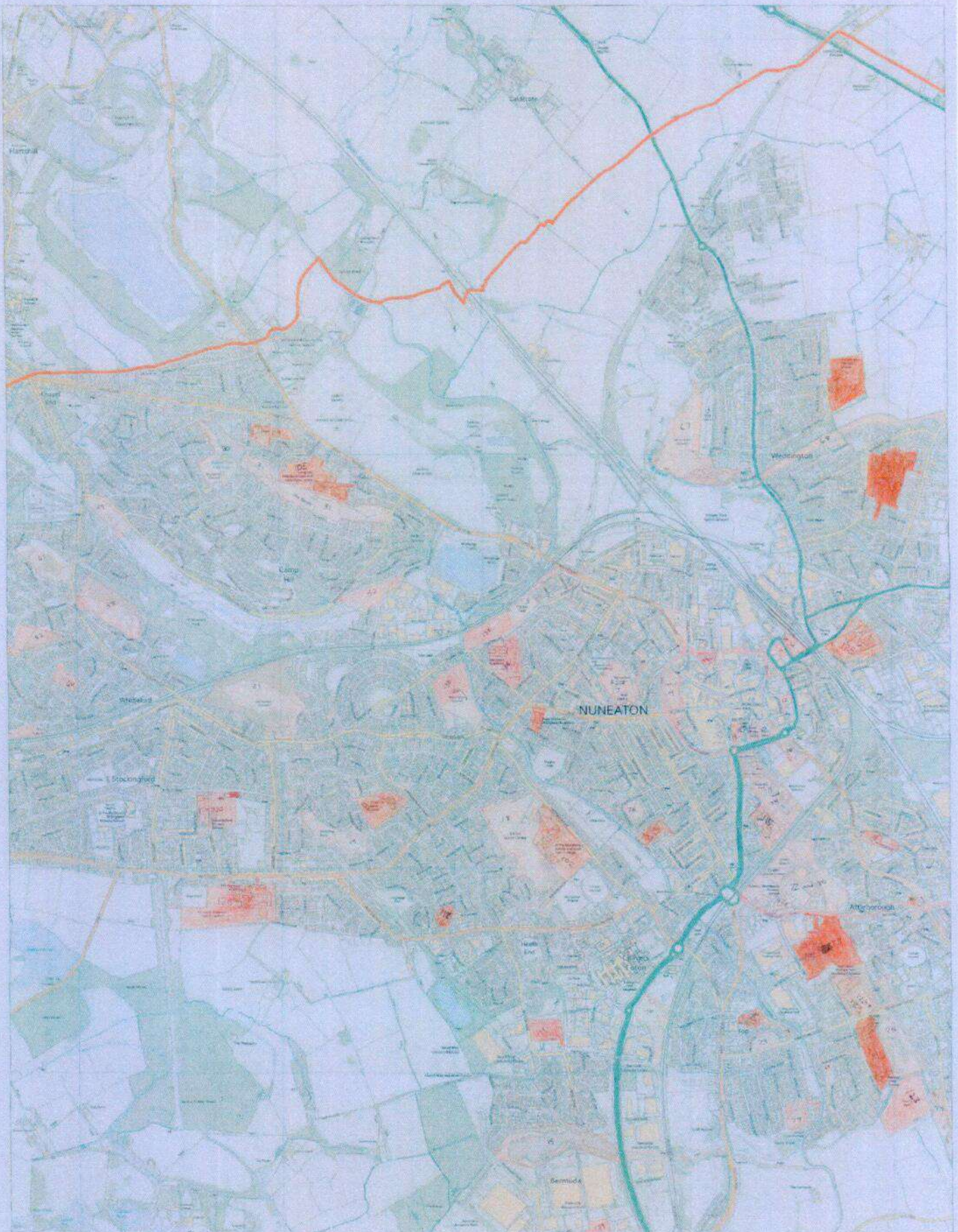
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B

North of Nuneaton



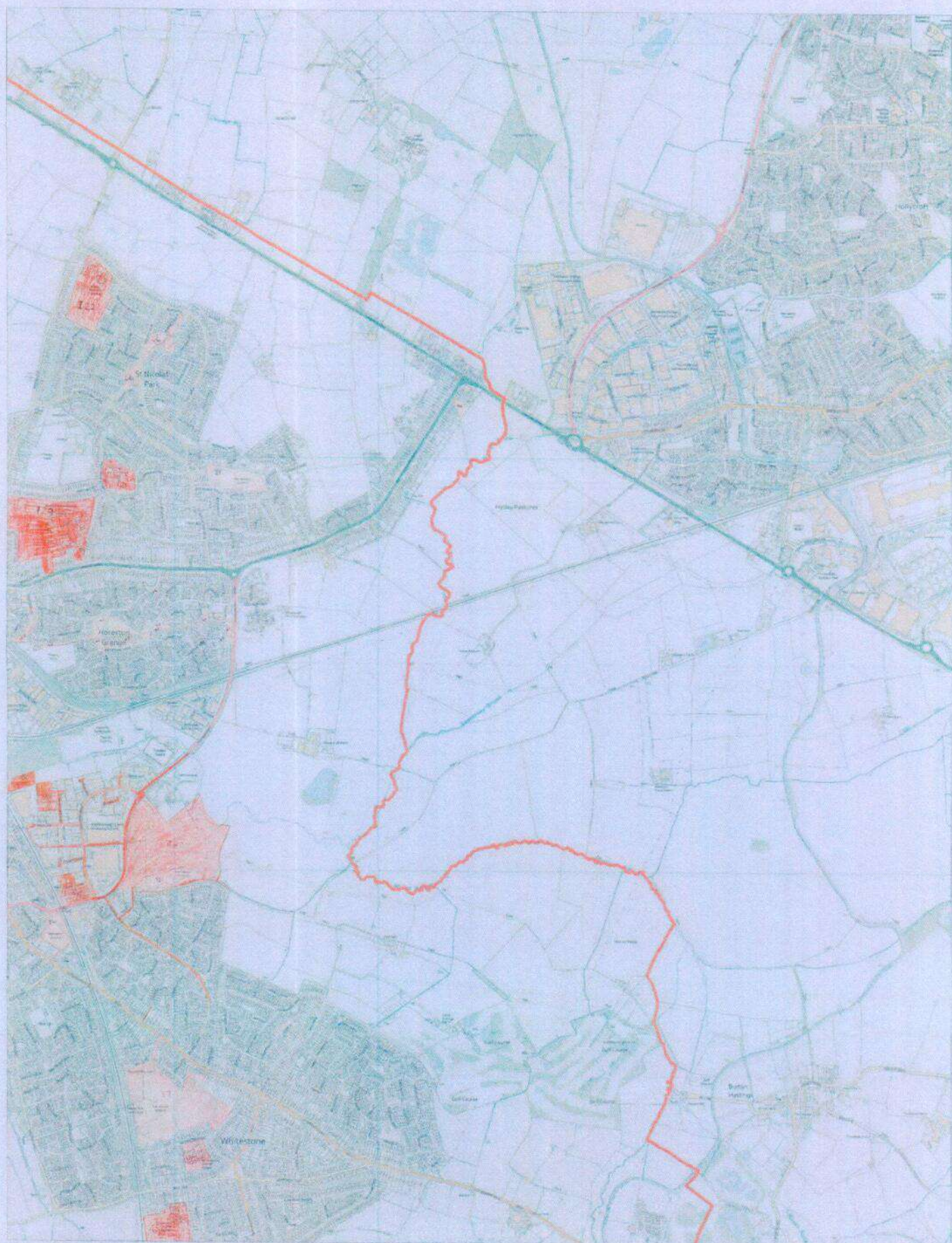
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Scale
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C

Northeast Nuneaton



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Scale
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D

Southwest Bedworth



E

South of Bedworth



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Scale
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F

Southeast Bedworth



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Scale
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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

On the

BETWEEN

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

Claimants

-and-

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

Defendants

Draft ORDER – FINAL .

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 CLAIM FOR THE FINAL INJUNCTION AND DISPOSAL OF THE CLAIM 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 1-9 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:

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 [REDACTED]
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.

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

6. 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 a planning inspector
7. 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
8. 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.
9. 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.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. 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.
12. 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.
13. 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.
14. 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)
15. Costs to be assessed in the sum of [ENTER SUM].

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. 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

19. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
20. 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.
21. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
22. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

23. 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).

Claimant
Paul Tietjen
First
14th March 2019
"PT1"

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 52 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

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

Defendants

WITNESS STATEMENT OF PAUL TIETJEN

I, Paul Tietjen, 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 I did Monday 11th March 2019 at 11.25 hrs attend at 1 Gapton Hall Road, Great Yarmouth, Norfolk NR31 0NL, serve the defendant John Mongan with the with the USB Stick containing evidence in support of claim; sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter form my instructing solicitors dated 4th March 2019, by placing said documents into a clearly addressed sealed envelope and posting it through the letterbox at 1 Gapton Hall Road, Great Yarmouth, Norfolk NR31 0NL.

2. THAT I did Monday 11th March 2019 at 12.35 hrs attend at Splashes, Castle Acre Road, Swaffham, Norfolk PE37 7XE, serve the defendant Michael Ward the with the USB Stick containing evidence in support of claim; sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule

1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter from my instructing solicitors dated 4th March 2019; by taping the documents to the communal letterboxes at Splashes, Castle Acre Road, Swaffham, Norfolk PE37 7XE.

3. True copies of the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter from my instructing solicitors dated 4th March 2019, so served by me is now shown to me marked "PT1".

Statement of Truth

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

Signed: 

Paul Tietjen

Dated: 14th March 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 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

"PT1"

This is the exhibit marked "PT1"

referred to in the Witness Statement of Paul Tietjen

Statement of Truth

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

Signed: 
Paul Tietjen

Dated: 14th March 2019

John Mongan
1 Gapton Hall Road
Great Yarmouth
Norfolk
NR31 ONL

Email: legal@nuneatonandbedworth.gov.uk

Date: 4 March 2019

Dear Sir/Madam

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

Nuneaton and Bedworth Borough Council & Warwickshire County Council have applied for an injunction in the above named proceedings against you. The Court will hear an application for the interim injunction on 19 March 2019 at the High Court, Queens Bench Division, Royal Courts of Justice, Strand, London.

By order of His Honour Justice Dove dated 22 February 2019, please find attached:

1. Part 8 Claim Form dated 22 February 2019
2. Application for Injunction dated 22 February 2019
3. Order of HHJ Dove for alternative service dated 22 February 2019
4. Draft Interim Injunction Order and attached Schedules to be applied for at the hearing on 19th March 2019
5. Draft Final Order together with Schedules
6. USB Stick containing evidence in support of claim.

The implications of the proposed Interim Order are contained within and include an application for a power of arrest if you are found to be encamped anywhere in the Borough as per Schedule 2 or on any of the sites as per Schedule 3.

A hard copy of the evidence in support of the claim will be provided within 2 working days of receipt of such request.

The documents forming part of this injunction application can also 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).

Yours faithfully,

For and on behalf of Nuneaton and Bedworth Borough Council



Michael Ward
Splashes
Castle Acre Road
Swaffham
Norfolk
PE37 7XE

Email: legal@nuneatonandbedworth.gov.uk

Date: 4 March 2019

Dear Sir/Madam

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

Nuneaton and Bedworth Borough Council & Warwickshire County Council have applied for an injunction in the above named proceedings against you. The Court will hear an application for the interim injunction on 19 March 2019 at the High Court, Queens Bench Division, Royal Courts of Justice, Strand, London.

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2. Application for Injunction dated 22 February 2019
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6. USB Stick containing evidence in support of claim.

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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).

Yours faithfully,
For and on behalf of Nuneaton and Bedworth Borough Council



Claim Form (CPR Part 8)

CLAIMANT'S COPY

In the High Court of Justice
Queen's Bench Division

Claim no. QB-2019-000616

Fee Account no.

Help with Fees -
Ref no. (if applicable)

H W F - - -

Claimant

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL
Town Hall, Coton Rd, Nuneaton CV11 5AA

(2) WARWICKSHIRE COUNTY COUNCIL
Shire Hall, Warwick CV34 4RL



Assigned to Master McCloud

Defendant(s)

(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

See attached for further details

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 Claimants seeks an injunction to protect the First Claimant's administrative area from further unauthorised encampments by the First to Fifty-Third Defendants, 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, [REDACTED]
[REDACTED]
[REDACTED]

See attached for further details

Court fee

£ 528.00

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.

Claim no.

QB-2019-000616

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 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

Statement of Truth

~~*(I believe)~~ (The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement.

Full name William Maxwell Hunt Rose

Name of claimant's legal representative's firm Sharpe Pritchard LLP

signed 

*(Claimant)(~~litigation friend~~)
(Legal representative)

position or office held Partner
(if signing on behalf of firm or company)

**delete as appropriate*

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.

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>

Application Notice

For help in completing this form please read the notes for guidance form N244 Notes

NOTICE OF HEARING
APPLICATION WILL BE HEARD AT THE
ROYAL COURTS OF JUSTICE, STRAND, LONDON
WC2A 2LL ON
DATE 19/3/19
TIME TBC
IN A COURT TO BE CONFIRMED

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.)	Nuneaton & Bedworth Borough Council and Warwickshire County Council
Defendants (including ref.)	(1) Thomas Corcoran & Ors
Date	22 February 2019



1. What is your name or, if you are a solicitor, 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 injunction in the terms of the draft Order attached for the reasons set out in the witness statements of Robert Watson, Martyn Stephens, Katherine Moreton, Philip Richardson and Carol Ingleston and their exhibits.

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. Witness statement of Robert Watson dated 15th February 2019 and its exhibits.
2. Witness statement of Martyn Stephens dated 19th February 2019 and its exhibits. x 2
3. Witness statement of Katherine Ann Moreton dated 19th February 2019 and its exhibits.
4. Witness statement of Philip Richardson dated 19th February 2019 and its exhibits.
5. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.

6. Witness statement of Sgt Andrew Scruton 0946 dated 6th March 2019 and exhibits.

Statement of Truth

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

Signed William M. Rose Dated 22 February 2019
Applicant's Solicitor

Full name William Maxwell Hunt Rose

Name of applicant's solicitor's firm Sharpe Pritchard LLP

Position or office held Partner
(if signing on behalf of firm or company)

11. Signature and address details

Signed William M. Rose Dated 22 February 2019
Applicant's Solicitor

Position or office held Partner
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

Sharpe Pritchard LLP
Elm Yard
13-16 Elm Street
London

Postcode WC1X 0BJ

If applicable

Phone no.	020 7405 4600
Fax no.	020 7831 1284
DX no.	353 London/Chancery Lane
Ref no.	WMHR/170.19

E-mail address wrose@sharpepritchard.co.uk

IN THE HIGH COURT OF JUSTICE

CLAIM NO:QB-2019-000616

QUEENS BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972, AND 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE DOVE

On the 22 day of February 2019

BETWEEN:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL



Claimants

-and-

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

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

Defendants

ORDER

UPON HEARING Counsel for the Claimants without notice to the Defendants

AND UPON reading the witness statement of Philip Richardson, Director of Arts Leisure and
Democracy at Nuneaton and Bedworth Borough Council

IT IS ORDERED THAT:

1. The application for the injunction shall be listed before a Judge on Tuesday 19 March
2019 at 10.30am, to allow three clear days between service of the proceedings and

the hearing date for the application for the interim injunction with a 2 hour time estimate.

2. Pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 the Claimants have permission to serve the Defendants between 6.30am and 8pm during the week and between 7am and 4pm on a Saturday. Copies (as opposed to originals) of claim forms and applications served on a Saturday will be deemed served on the second working day after the date of service and copies (as opposed to originals) of claim forms and applications served after 4pm on a working day shall be deemed served on the second working day after the date of service.
3. In the event that the Claimants are unable to personally serve any of the 1st to 53rd Defendants, pursuant to CPR Part 6.14 and 6.15 the Claimant shall be permitted to serve any such Defendants by leaving a copy (as opposed to an original) of the application notice, claim form, draft order, and supporting evidence, in a clear transparent envelope and affixing the same to a caravan, mobile home, or, other vehicle, or, the front door of any residential premises, which in each case is reasonably believed to be owned or occupied by the said Defendants, or, by putting such copy documents through the letter box of any such residential premises. Any such copy documents served by this method will be deemed served the second working day after service of the application notice and claim form.
4. The Claimants shall be permitted pursuant to CPR Part 6.27 to serve the evidence in support of the Claim and application for an interim injunction by USB memory stick and shall provide any Defendant that requests hard copies of the same within 2 working days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the First Claimant's offices at Town Hall, Cotton Road, Nuneaton, Warwickshire CV11 5AA between the hours of 10am and 4pm Monday to Friday excluding public holidays.
5. The claim form and application notice shall be deemed served on Persons Unknown (Second Defendant) pursuant to CPR Part 6.14, 6.15, 6.27 and 6.27 by serving a copy (as opposed to an original) of the claim form, application notice and draft order on

all 141 sites identified in Schedule 3 of this Order by affixing them in a prominent place on the Land with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from the First Claimant's offices at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA.

6. The Defendants shall acknowledge service of the claim form 21 days after the date of deemed service and file any written evidence in support of the Defence by the same date.
7. The Claimants have permission to serve the Defendants with a sealed copy of this Order (as opposed to an original).

QUEEN'S BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990

Before

On the

BETWEEN

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

Claimants

-and-

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

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

Defendants

Draft ORDER - INTERIM.

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 1-9 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:

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 [REDACTED]
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.

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

6. 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 a planning inspector
7. 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
8. 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.
9. 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.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. 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.
12. 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.
13. 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.
14. 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)
15. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. 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

19. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
20. 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.
21. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
22. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

23. 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 (redacted for service)

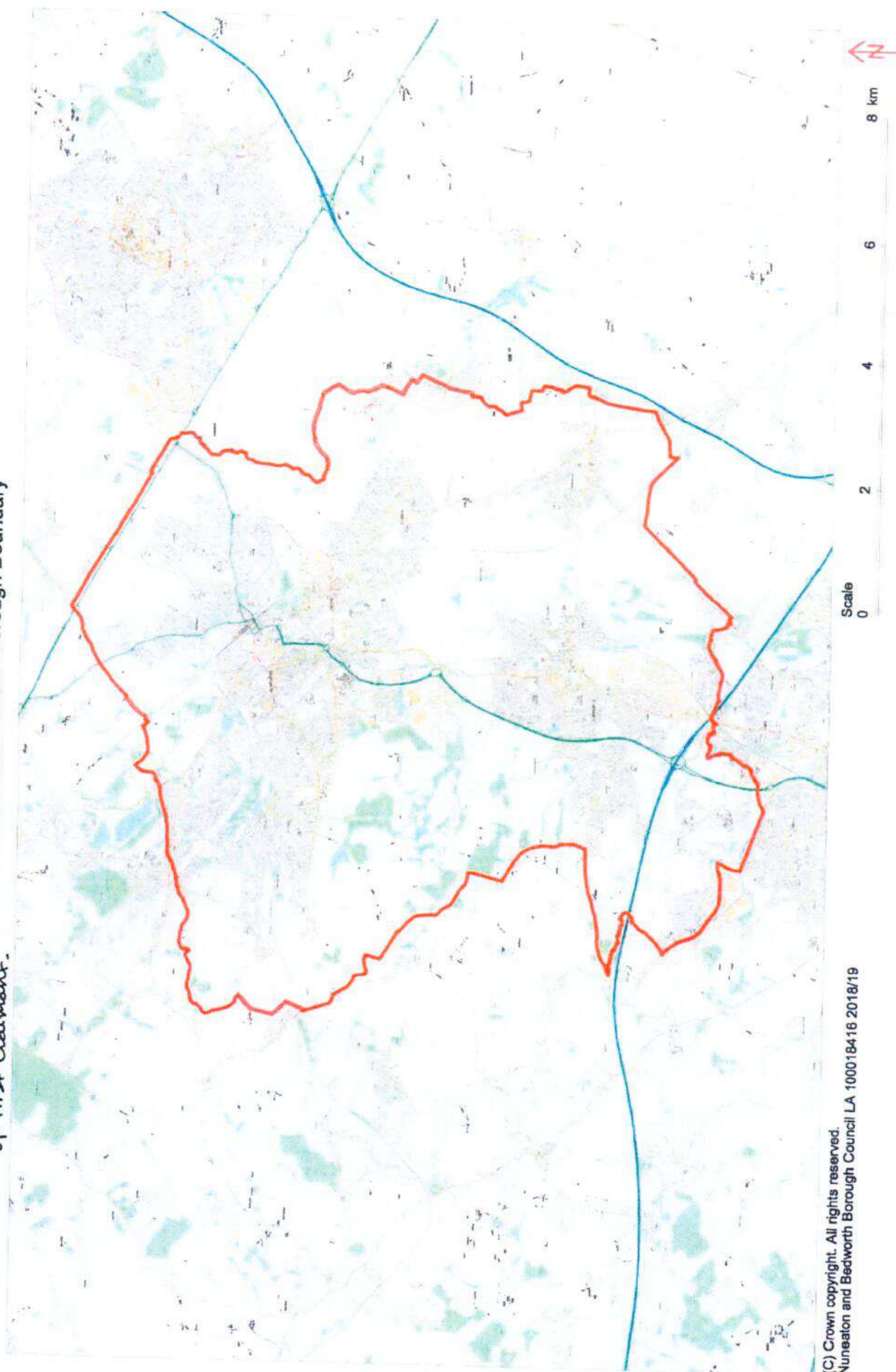
- (2) JESSICA DODD,
- (3) MICHAEL DOYLE
- (4) LUKE DELANEY
- (5) PATRICK McGINLEY,
- (6) ALPHONSUS McGINLEY
- (7) MICHAEL STOKES
- (8) MICHAEL STOKES
- (9) DENNIS STOKES
- (10) DENNIS STOKES (JNR)
- (11) BRIAN STOKES, 12a
- (12) JOHN MAUGHAN
- (13) TERRY MAUGHAN
- (14) TERRY MAUGHAN
- (15) PATRICK MAUGHAN
- (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

SCHEDULE 2 - Administrative Boundary
of First Claimant.

Nuneaton and Bedworth Borough Boundary



SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

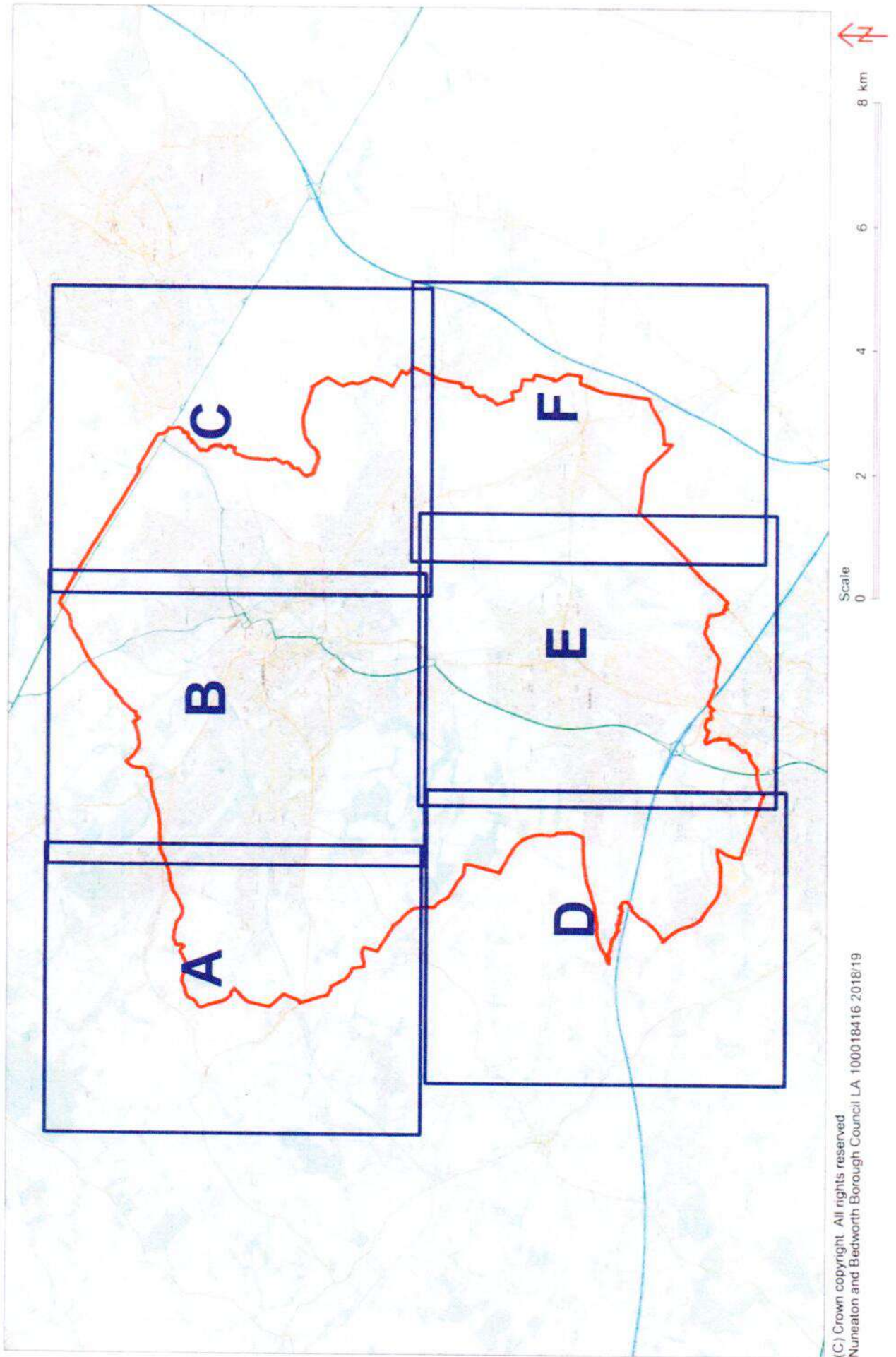
SITE NUMBER	SITE	>5 acres	POSTCODE	Land Owner	Title Number
1	Land on the north side of Corporation Street, Nuneaton	✓		NBBC	WK447699
2	Recreation ground lying to the north of Queens Road, Nuneaton	✓	CV11 5PZ	NBBC	WK446269
3	Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton	✓	CV11 5ET	NBBC	WK447951/ WK240764/ WK236363
4	Land being car park on the south west side of Corporation Street, Nuneaton	✓	CV11 5DG	NBBC	WK449599
5	Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RU)	✓	CV11 5QE	NBBC	WK449585/ WK178804
6	Joinery works and adjacent premises fronting Regent Street, Nuneaton	✓	CV11 4BW	Private	WK398436
7	Land on the west and east sides of Vicarage Street, Nuneaton	✓	CV11 5DB	NBBC	WK450184
8	Riversley Park Clinic, Cotton Road, Nuneaton (CV11 5TY)	✓	CV11 4BS	Private	WK366584
9	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	✓	CV11 5NE	NBBC	WK251517
10	Land at Church Street, Nuneaton	✓	CV11 4AS	NBBC	WK446976
11	Land and buildings lying to the East of Cotton Road	✓	CV11 5AA	NBBC	WK88882
12	Land at Vicarage Street, Nuneaton	✓	CV11 4AL	NBBC	WK226942
13	Land at Cotton Road, Nuneaton	✓	CV11 5AA	NBBC	WK450296
14	Meadow Court, Meadow Street, Nuneaton (CV11 5JE)	✓	CV11 5JF	NBBC	WK448678
15	Land to the south side of Bermuda Road lying to the east and west of Coventry Road, Chivers Cotton 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	✓		NBBC	WK448511/ WK284250/ WK345891
16	Recreation Ground at Enkayboro Way, Nuneaton	✓	CV11 4BY	NBBC	WK449338
17	Land on south side of Lutterworth Road, Nuneaton	✓	CV11 6QA	NBBC	WK449277
18	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	✓	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
19	Land lying to the east of Westbury Road and land lying to the North of Herbert Street, Nuneaton	✓		NBBC	WK342561/ WK355952
20	Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC	WK447355
21	Land at Whitelifford Park, Haunchwood Road, Nuneaton, land lying to the north east of Haunchwood Road	✓	CV10 8PY	NBBC	WK130458/ WK447033
22	Land on the south side of Marston Lane, Nuneaton	✓	CV12 8DR	NBBC	WK448160
23	Land on the north side of Marston Lane, Bedworth	✓	CV12 8DR	NBBC	WK448256
24	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 & Zon Chapel, High Street, Bedworth	✓	CV12 8NF	NBBC	WK448876/ WK246825/ WK448601
25	Park Road (Car Park) - land on the east side of Park Road, Bedworth	✓	CV12 8LH	NBBC	WK448511
26	Barnacle Lane E.A. - land to the south of Barnacle Lane, Bukington, Bedworth, land at Barnacle Lane, Bukington, Bedworth	✓		NBBC	WK448611/ WK448624(part)
27	Land at Brewer Road, Bukington, Bedworth and land at Eustace Road, Bukington, Bedworth	✓	CV12 9RF	NBBC	WK448510/ WK448500
28	Recreation Ground, Bedworth Road, Bukington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK440849
29	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK439320
30	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden Avenue, Nuneaton	✓	CV10 9DJ	NBBC	WK448197/ WK448093
31	Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton	✓	CV10 9DE	NBBC	WK373679/ WK448513
32	Land on the south side of Willow Road, Nuneaton	✓		NBBC	WK447731
33	Land on the West side of Blackberry Lane, Bedworth	✓		NBBC	WK137139
34	Hockley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	✓	CV17 9EX	NBBC	WK450050
35	Land lying to the North East of Howat Road, Bedworth	✓	CV17 8NG	NBBC	WK124031
36	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry	✓		NBBC	WK336223
37	Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	✓	CV17 9GZ	NBBC	WK143991/ WK154857
38	Land on the east side of Bucks Hill, Nuneaton	✓	CV10 9TD	NBBC	WK358453
39	Land south-east of Hickman Road, Gailley Common, Nuneaton	✓	CV10 9SD	NBBC	WK339730

40	Nuneaton & North Notts Group Riding for Disabled, Valley Road, Galleys Common (CV10 9NJ) / land at Campbell Close, Nuneaton and land at Galleys Common, Nuneaton (CV10 9NL)	x	CV10 9PZ	NBBBC	WK447381/ WK439120/ WK244033/ WK238145
41	Fresham Drive and land on the north east side of Melton Avenue, south east side of Freshland Rise, Whitford and land lying to the West of Bucks Hill	✓	CV10 9QF	NBBBC	WK319146/ WK326554
42	Land on the east and west side of Sherbourne Avenue, Whitford, Nuneaton	✓	-	NBBBC	WK319145
43	Land on Galleys Common, Nuneaton, land at Galleys Common Nuneaton	✓	CV10 9PZ	NBBBC	WK238447/ WK238145/ WK324522
44	Land on the south side of Plough Hill Road, Stockingford	✓	CV10 9JH	NBBBC	WK234444
45	Land on the south side of Sherbourne Avenue, Nuneaton	✓	CV12 0H0	NBBBC	WK281821
46	Land and Buildings at Market End Farm and Orchard Farm, Smorall Lane	✓	CV12 0GE	Private	WK380708
47	Land at Smorall Lane, Bedworth	✓	CV12 0JP	NBBBC	WK449887
48	Land on the North side of Anley Road, Stockingford	✓	CV10 8NN	NBBBC	WK32497
49	Kingwood Road Rec - Land on the North side of Anley Road, Stockingford	✓	CV10 9QS	NBBBC	WK32497
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	✓	CV10 8JX	NBBBC	WK448137/ WK448304/ WK317827
51	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8NW	NBBBC	WK448032
52	Land lying to the West side of Blackhorse Road, Bedworth	✓	CV6 8TE	Private	WK394575
53	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 8BH	NBBBC	WK168700/ WK448169/ WK250992/ WK448429
54	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBBC	WK448032
55	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8NN	NBBBC	WK448032
56	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBBC	WK448032
57	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	✓	CV12 8UG	NBBBC	WK366034
58	Land at Albany Avenue, Bedworth	✓		NBBBC	WK448598
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	✓		NBBBC	WK295688/ WK460024/ WK448169/ WK317827
60	Land on the north and south sides of Newtown Road, Nuneaton	✓	CV12 0AL	NBBBC	WK448848
61	Land lying to the north of Buttermere Avenue, Nuneaton	✓	CV11 8EP	NBBBC	WK210586
62	Land at Horseshoe Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	✓		NBBBC	WK336798/ WK344607
63	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	✓	CV11 6YB	NBBBC	WK447654/ WK319282
64	Recreation Ground, The Long Street, Nuneaton (CV11 6JH)	✓	CV11 6JH	NBBBC	WK446568
65	Land at Horseshoe Grange and land to the south of Hinckley Road, Nuneaton	✓	CV11 6YL	NBBBC	WK336798/ WK447654
66	Land on the east side of Changebrook Close and land on the west and east side of Palmet Drive, Nuneaton	✓	-	NBBBC	WK345480/ WK308653
67	Land on the south side of Church Lane, Nuneaton	✓	CV10 0HG	NBBBC	WK448958
68	Land on the north side of Brookdale Road, Nuneaton and land on the North side of Ryde Avenue, Nuneaton	✓	CV10 0BN	NBBBC	WK448096/ WK448091
69	Land at Blakesstone Road, Nuneaton	✓		NBBBC	WK450499
70	Land on the north side of Donithorne Avenue, Nuneaton	✓		NBBBC	WK452385
71	Land on the south side of Avenue Road, Nuneaton	✓		NBBBC	WK452276
72	Land on the north side of Avenue Road, Nuneaton	✓		NBBBC	WK448565
73	Land on the north side of Donithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	✓		NBBBC	WK448842/ WK448819
74	Land on the south-west side of Marlborough Road, Nuneaton	✓	CV11 5PQ	NBBBC	WK447475
75	Land at Donithorne Avenue, Nuneaton, land lying to the east of Raveloe Drive, Nuneaton, and on the east side of Marston Lane, Nuneaton and land on the east and west sides of Marston Lane, Nuneaton	✓	CV11 4RE	NBBBC	WK452370/ WK452349/ WK449460/ WK448734
76	Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chivers Coton	✓	CV10 7BX	NBBBC	WK448537/ WK344972
77	Roversley Park, Coton Road, Nuneaton	✓	CV11 5TV	NBBBC	WK450206/ WK450173

78	Land at Sorrell Road, Nuneaton	✓	CV10 7AW	NBBC	WK450035
79	Riversley Park (Car Park) - Riversley Park, Cotton Road, Nuneaton	✓	CV11 5TX	NBBC	WK450206/WK450173
80	Land on the north side of Avenue Road, Nuneaton	✓	CV11 4LX	NBBC	WK448965
81	Land lying to the east of Ladbroke Way, Nuneaton	✓	CV11 6XA	NBBC	WK370915
82	Trinity Court Flats (Car Park) - land on the West side of Hagfield Road, Nuneaton	✓	CV11 4PW	NBBC	WK110067
83	Land at Ascalia Crescent, Bedworth	✓		NBBC	WK448428
84	Land at Duns Close, Nuneaton	✓		NBBC	WK452130
85	Land lying to the West of Blackhorse Road, Bedworth	✓		Private	WK344575
86	Atterborough Fields Farm, Nuneaton and Land at Siringsby Close, Atterborough Fields Industrial Estate, Nuneaton	✓		WCC	WK271645/WK455198
87	Nicholas Chamberlain School, Bukington Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC	WK470015/WK414958
88	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV7 9AH)	✓	CV7 9AH	Private	WK461626
89	Race Leys Infant School, Bedworth	✓	CV12 8AD	WCC	Unregistered
90	Goodwin's End County First School, Bowling Green Lane, Bedworth (CV12 9HP)	✓	CV12 9HP	WCC	WK434335
91	All Saints Bedworth C of E Primary School and Nursery, Bedworth	✓	CV12 9HP	WCC	Unregistered
92	Land on the West side of Weston Lane, Bukington, Bedworth	✓	CV12 9RT	WCC	WK279171
93	Land and buildings on the South side of Denwest Road, Bedworth	✓	CV12 8RT	Private	WK270613
94	Land lying to the East of Coventry Road, Bedworth	✓	CV7 9FJ	WCC	WK31092
95	Keresley Newland Primary Academy and Keresley Newland School, Grove Lane, Keresley, Coventry (CV7 8JZ)	✓	CV7 8JZ	WCC	WK427632/WK477207
96	Land lying to the South of Smoral Lane, Goodyears End, Bedworth and Land lying to the South of Smoral Lane, Bedworth	✓	CV12 0HA	WCC	WK27048/WK114659
97	Wheeler Lane Primary School, Ash Green, Coventry	✓	CV7 9RN	WCC	WK425267
98	St Francis Roman Catholic School, Nicholas Street, Bedworth	✓	CV12 8JN	Private	WK262596
99	Land lying to the North of Rye Piece Ridgeway, Bedworth	✓		Private	WK476476
100	Land on the East Side of Nicholas Street, Bedworth	✓		WCC	WK171188
101	Land on the South Side of Hayes Lane, Ewhall, Bedworth	✓	CV7 9NS	WCC	WK171647
102	St James Church of England Junior School, Barbridge Road, Bukington, Bedworth (CV12 9RF)	✓	CV12 9RF	Private	WK461770
103	Playing fields at St. James Church of England Junior School, Barbridge Road, Bukington, Bedworth (CV12 9RF)	✓		Private	WK477207
104	St Michael's Primary School, Hazel Grove, Bedworth (CV12 9DA)	✓	CV12 9DA	Private	WK479304
105	Land adjoining St Thomas More School, Greenmoor Road, Nuneaton, CV10 7EX	✓	CV10 7EX	Private	WK478035
106	St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX	✓		Private	WK477630
107	Albury High School, Greenmoor Road, Nuneaton	✓		Private	WK23418
108	Alley C of E Infant School, Nuneaton	✓	CV11 5EL	WCC	Unregistered
109	All Saints C of E Primary School & Nursery, Keresley Crescent, Nuneaton (CV10 7AT)	✓	CV10 7AT	Private	WK461748
110	Land to the South of Tuttle Hill, Camp Hill, Nuneaton	✓	CV10 9QA	WCC	WK409218
111	Land lying to the South of Gipsy Lane, Nuneaton	✓	CV11 4SE	WCC	WK170501
112	Land at Judkins Quarry, Tuttle Hill, Nuneaton	✓	CV10 0HU	WCC	WK393091
113	Chivers Cotton First School, Frank Street, Nuneaton (CV11 5RB)	✓	CV11 5RB	WCC	WK424955
114	Land lying to the west of Northumberland Avenue, Nuneaton	✓	CV10 8ES	WCC	WK279413
115	Galley Common Infant School, Nuneaton	✓	CV10 9NZ	WCC	Unregistered
116	Land lying to the East of Higham Lane, Nuneaton	✓	CV11 6US	WCC	WK2705172
117	Land on the south side of Skye Close, Nuneaton	✓	CV10 7LW	WCC	WK178493
118	Middlemarch School, Nuneaton	✓	CV10 7BQ	WCC	Unregistered
119	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 8HW	WCC	WK426873
120	Land and buildings on the south side of St Paul's Road, Nuneaton	✓		WCC	WK180095
121	School at Cotton Road, Nuneaton	✓	CV11 5TY	Private	WK226511
122	Our Lady of the Angels Infant School and St Joseph's RC First School, Cotton Road, Nuneaton, CV11 5TY	✓		Private	WK477543
123	Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Anstley Road, Nuneaton	✓	CV10 8NL	Private	WK479617
124	Land on the North Side of Anstley Road, Nuneaton	✓		Private	WK189736
125	Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LN	✓		Private	WK471379
126	St Pauls C of E Primary School, Nuneaton	✓	CV10 8BH	Private	Unregistered
127	Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	✓	CV10 0JX	Private	WK460568
128	St Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX	✓		Private	WK449953
129	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	✓	CV11 4QH	Private	WK460047
130	Oakwood Secondary School, Morris Drive, Nuneaton	✓		Private	WK460048

109	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	✓			WCC	WK233776
121	Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 6PJ	✓		CV11 6HJ	WCC	WK271130
122	Land on the East Side of Windemere Avenue, Nuneaton	✓			Private	WK131856
123	St Nicolas C of E First School, Windemere Avenue, Nuneaton, CV11 6HJ	✓			Private	WK271119
124	Land lying to the North East of Oakdene Crescent, Nuneaton	✓		CV10 0DR	WCC	WK140023/WK216447
125	Land at George Eliot School, Ravelhoe Drive, Nuneaton, CV11 4GP	✓		CV11 4QP	Private	WK558966
126	Land on the North Side of Avenue Road, Nuneaton	✓		CV11 4LJ	NBBC	WK448965
127	Elton College, Leicester Road, Nuneaton, CV11 6AA	✓		CV11 6AA	WCC	WK425515
128	Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	✓		CV10 0BJ	Private	WK465311
129	127 Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓		CV11 4QH	WCC	WK468047/WK468048/WK233776
130	Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy	✓		CV10 7PD	WCC	WK175243/WK427489
131	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓		CV11 6BH	Private	WK238695
132	CV11 6BH	✓			Private	WK27842/WK497812
133	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓		CV11 4BE	Private	WK276282
134	Bedworth Heath Nursery School, Gibe Avenue, Bedworth, CV12 0GP	✓		CV12 0GP	WCC	WK416690
135	Exhall Grange School and Science College, Wheelwright Lane, Bedworth	✓			Private	WK450475
136	Exhall Grange Special School, Wheelwright Lane, Coventry	✓		CV17 9HP	Private	WK450903
137	Land at Exhall Grange School, Wheelwright Lane, Coventry, CV17 9HP	✓		CV10 7SD	WCC	WK363444
138	North Side of Griff Lane, Nuneaton	✓		CV12 8AG	WCC	WK230678
139	Land lying to the West of Leicester Road, Nuneaton	✓		CV12 8HG	Private	WK455841
140	Race Lays Mode School, Barton Road, Bedworth, CV12 8HG	✓			WCC	WK380085
141	Land and buildings on the south side of St Paul's Road, Nuneaton	✓		CV10 6JH	WCC	WK41667
142	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 6JH)	✓		CV11 4SQ	WCC	WK23140
143	Land on the South West Side of Maltby Crescent, Nuneaton	✓			Private	WK256088
144	Attleborough Mill, Attleborough Road, Nuneaton	✓		CV11 5SS	Private	WK410022
145	Manor Park Community School, Beaumont Road, Nuneaton	✓		CV10 7SQ	Private	WK447790
146	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓		CV11 5UT	Private	WK390614
147	140 Halfords - land and buildings on the south side of Newfarn Road, Nuneaton	✓			Private	WK474729
148	Bermuda Road Community Centre, Bermuda Road, Nuneaton	✓		CV10 7HU	Private	

Key for traveller encampment maps



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A

Northwest Nuneaton



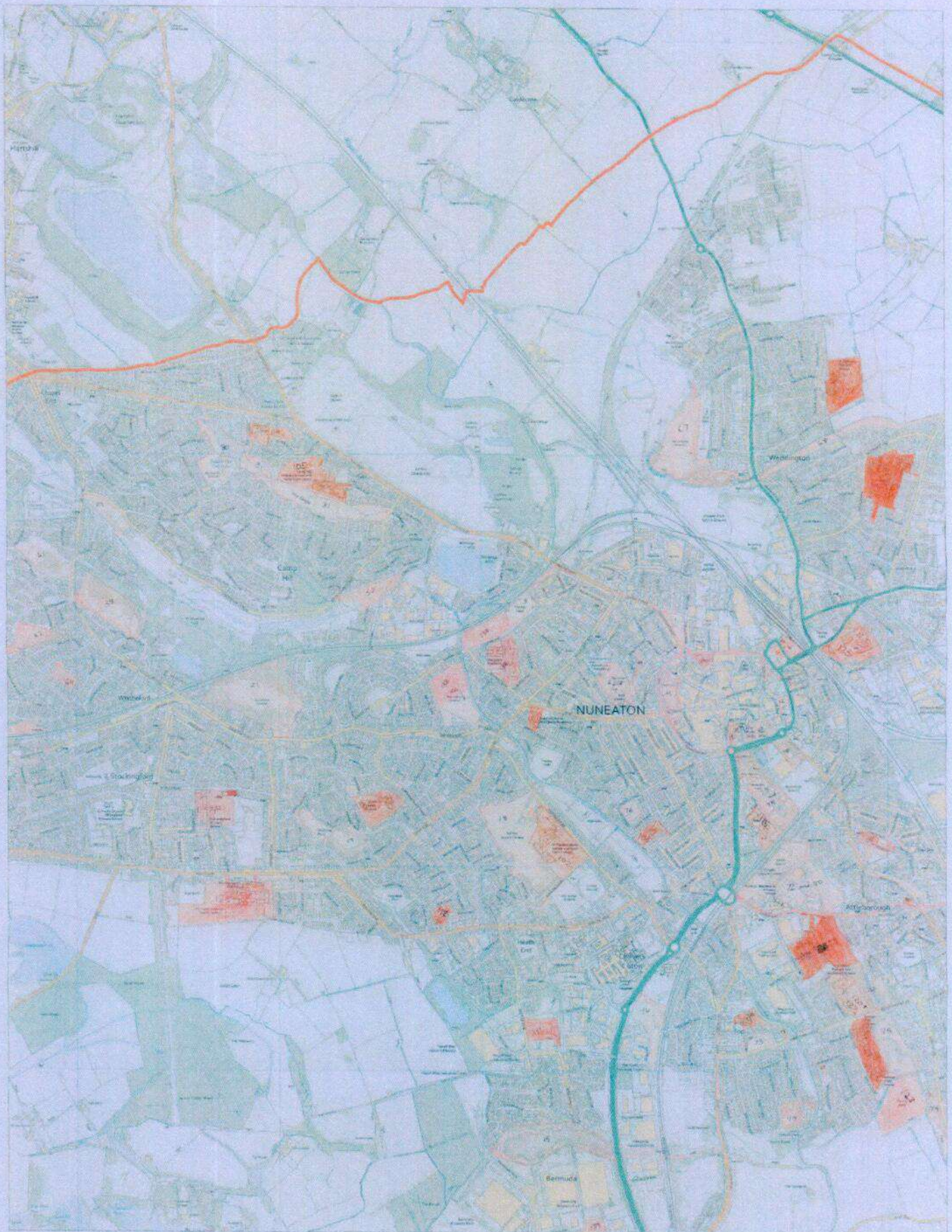
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 Nuneaton and Bedworth Borough Council LA
 100018416 2018/19

Scale
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B

North of Nuneaton



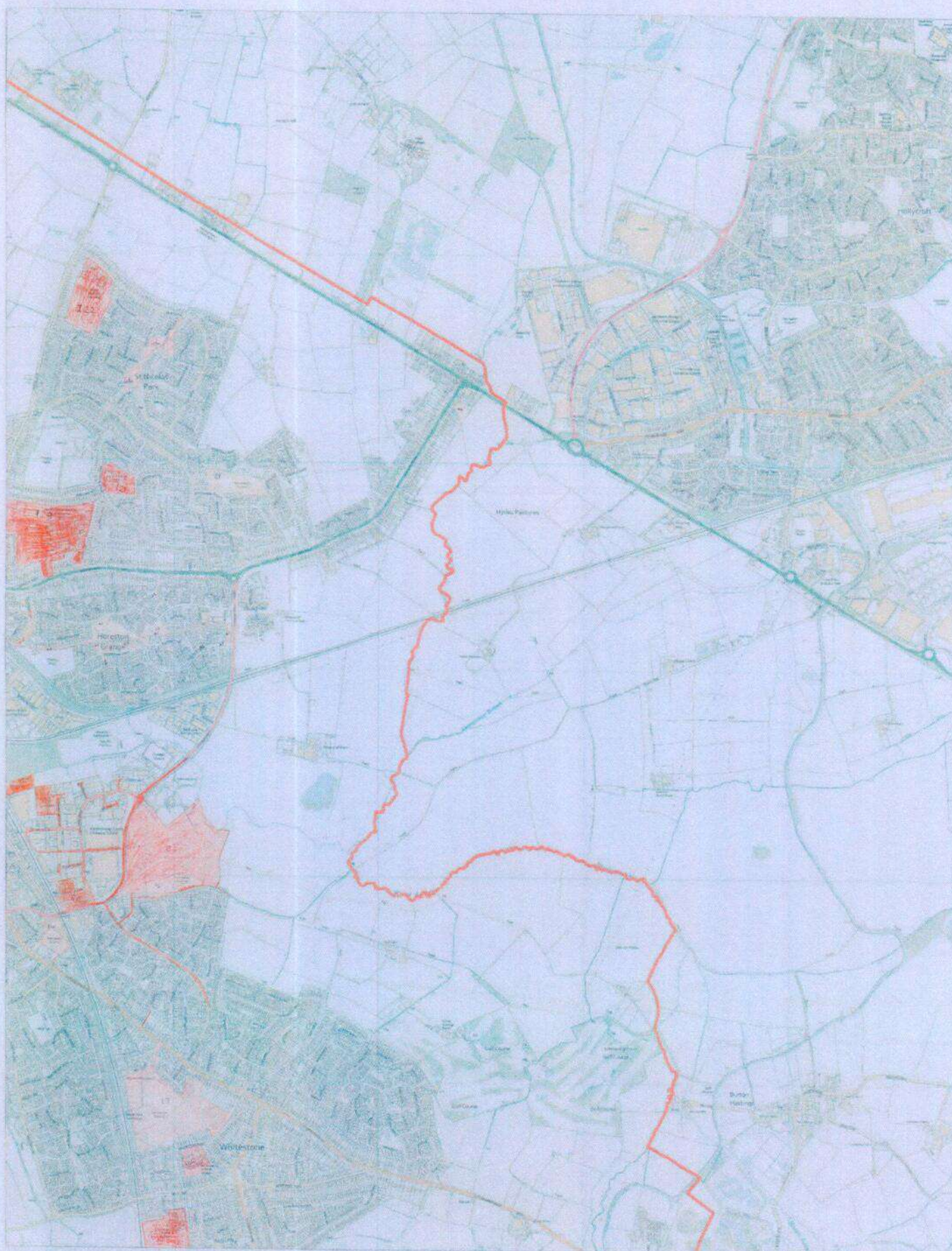
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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Scale
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C

Northeast Nuneaton



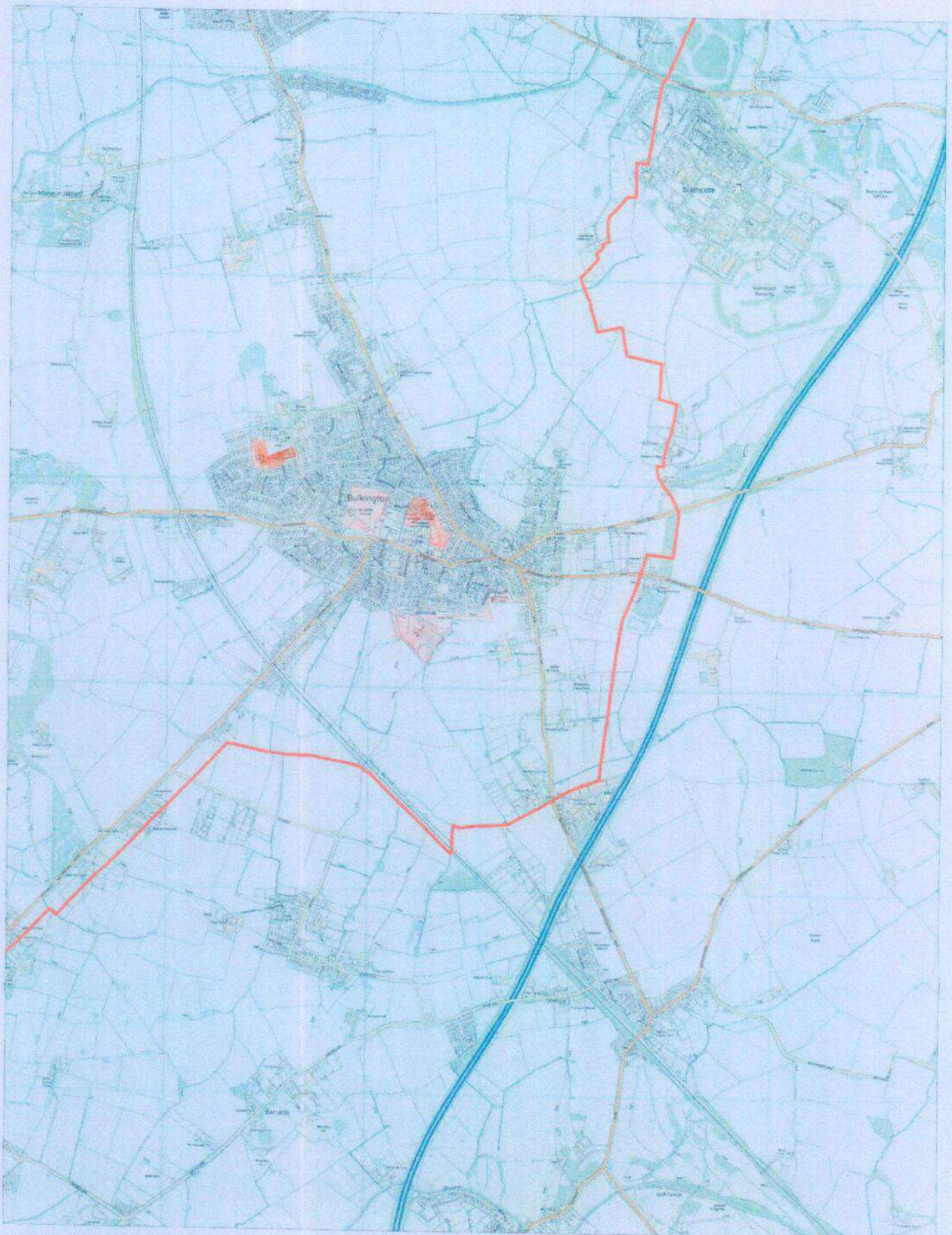
D

Southwest Bedworth



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Southeast Bedworth



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Nuneaton and Bedworth Borough Council LA
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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

On the

BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

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

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

Defendants

Draft ORDER - FINAL .

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 CLAIM FOR THE FINAL INJUNCTION AND DISPOSAL OF THE CLAIM 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 1-9 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:

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 [REDACTED]
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.

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

6. 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 a planning inspector
7. 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
8. 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.
9. 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.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. 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.
12. 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.
13. 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.
14. 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)
15. Costs to be assessed in the sum of [ENTER SUM].

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. 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

19. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
20. 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.
21. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
22. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

23. 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).

Claimant
Harry Michael Mellor
Second
15th March 2019
"HMM1-HMM2"

IN THE HIGH COURT OF JUSTICE

QB-2019-000616

QUEEN'S 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 52 OTHER NAMED DEFENDANTS IN
SCHEDULE 1 OF THE CLAIM FORM

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

Defendants

WITNESS STATEMENT OF 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 the Honourable Mr Justice Dove dated 22nd February 2019, between 14.03hrs on Friday 8th March 2019 and 9.09 hrs on Monday 11th March 2019 effect service of 32 copies of the said Order on 32 named defendants on schedule 1 attached to the Order by inserting a complete copy of the Order of the Honourable Mr Justice Dove dated 22nd February 2019 and the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final; USB Stick containing evidence in support of claim and a covering

letter form my instructing solicitors dated 4th March 2019, in a clearly addressed sealed envelopes addressed to the named defendants. I personally served one named defendant and 31 named defendants were served by letterbox.

2. A schedule detailing the defendant's name; the defendant's address; the time of service and how the defendant was served; is now produced and shown to me marked "HMM1".

3. True copies of the Order of the Order of the Honourable Mr Justice Dove dated 22nd February 2019 and the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter form my instructing solicitors dated 4th March 2019, so served by me are now shown to me marked "HMM2".

Statement of Truth

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

Signed: 

Harry Michael Mellor

Dated: 15th March 2019

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

"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: 15th March 2019

Nuneaton and Bedworth Borough Council & Warwickshire County Council -v- Thomas Corcoran & Others
Application for Injunction against Unauthorised Encampments
Claim number: QB-2019-000616

Schedule of named defendants served by Harry Michael Mellor

Defendant	Address		Date & Time Served	Service
1 9 Dennis Stokes	12 Bashely Road Caravan Site, Bashley Road	NW10 6TH	08/03/19 14:03hrs	Letter Box
2 15 Patrick Maughan	12 Bashely Road Caravan Site, Bashley Road	NW10 6TH	08/03/19 14:03hrs	Letter Box
3 40 Roseleen Ward	6 St Agnells Lane	HP2 7AX	08/03/19 15:05hrs	Letter Box
4 26 Leonard Monghan	8 pendles Paddock, Marlow Road	HP14 3UW	08/03/19 16:07hrs	Letter Box
5 7 Michael Stokes	29 Oaktree Field Caravan Site, Odstock Road	SP2 8BY	08/03/19 17:55hrs	Letter Box
6 8 Michael Stokes	6 Horsdean Travelers Site, Braypool Lane	BN1 8PP	08/03/19 19:55hrs	Letter Box
7 21 Martain Maughan	81 Constitution Road			
8 34 Kathleen McDonaugh	3 Orchard View	ME5 7DN	09/03/19 07:05hrs	Letter Box
9 1 Thomas Corcoran	7 Sandiacre	CM14 5SU	09/03/19 07:40hrs	Letter Box
10 2 Jessica Dodd	7 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
11 3 Michael Doyle	6 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
12 4 Luke Delaney	12 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
13 5 Patrick McGinley	7 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
14 6 Alphonsus McGinley	7 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
15 12 John Maughan	14	CM77 8DL	09/03/19 08:42hrs	Letter Box
16 16 Owen Maughan	7 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
17 20 Francis Maughan	14 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
18 33 Aaron McDonaugh	9 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
19 24 Martin Mongan	14 Sandiacre	CM77 8DL	09/03/19 08:42hrs	Letter Box
20 11 Brian Stokes	12a, Orchard Drive	CM77 8DL	09/03/19 08:42hrs	Letter Box
21 32 Martin McDonaugh	29 Speyside Court,	CB24 8PT	09/03/19 09:45hrs	Letter Box
22 42 John Connors	2 Costalot Stables, Heath Road	PE2 6SN	09/03/19 10:47hrs	Letter Box
23 43 Tracey Brown	72 Lower Ecton, Ecton Lane Caravan Site	LE67 1DG	09/03/19 12:10hrs	Letter Box
24 10 Dennis Stokes (JNR)	Caravan 6 Dun Roamin Park	NN3 5HQ	09/03/19 13:20hrs	Letter Box
25 30 John McDonaugh	Caravan 7 Dun Roamin Park	NN13 5TD	09/03/19 14:10hrs	Letter Box
26 35 Winnie McDonaugh	Caravan 14 Dun Roamin Park	NN13 5TD	09/03/19 14:10hrs	Letter Box
27 13 Terry Maughan	70 Exton Avenue	LU2 0LJ	09/03/19 15:20hrs	Personal Service
28 25 Martin Mongan	9 Limehouses, Boathorse Road,			
29 29 Bernard McDonaugh	37 Boathorse Road	ST6 4QQ	11/03/19 07:40hrs	Letter Box
30 17 Owen Maughan	8 Imari Park, 38 Russell Street	ST7 4JA	11/03/19 07:45hrs	Letter Box
31 27 Paul McDonaugh	9 Russell Street	DE24 8AL	11/03/19 09:09hrs	Letter Box
32 39 Kathleen Ward	2 Imari Park, 38 Russell Street	DE24 8AL	11/03/19 09:09hrs	Letter Box
33 19				

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: 15th March 2019

Email: legal@nuneatonandbedworth.gov.uk

Date: 4 March 2019

Dear Sir/Madam

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

Nuneaton and Bedworth Borough Council & Warwickshire County Council have applied for an injunction in the above named proceedings against you. The Court will hear an application for the interim injunction on 19 March 2019 at the High Court, Queens Bench Division, Royal Courts of Justice, Strand, London.

By order of His Honour Justice Dove dated 22 February 2019, please find attached:

1. Part 8 Claim Form dated 22 February 2019
2. Application for Injunction dated 22 February 2019
3. Order of HHJ Dove for alternative service dated 22 February 2019
4. Draft Interim Injunction Order and attached Schedules to be applied for at the hearing on 19th March 2019
5. Draft Final Order together with Schedules
6. USB Stick containing evidence in support of claim.

The implications of the proposed Interim Order are contained within and include an application for a power of arrest if you are found to be encamped anywhere in the Borough as per Schedule 2 or on any of the sites as per Schedule 3.

A hard copy of the evidence in support of the claim will be provided within 2 working days of receipt of such request.

The documents forming part of this injunction application can also 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).

Yours faithfully,

For and on behalf of Nuneaton and Bedworth Borough Council



Claim Form (CPR Part 8)

CLAIMANT'S COPY

In the High Court of Justice

Queen's Bench Division

Claim no.

QB-2019-000616

Fee Account no.

Help with Fees -

Ref no. (if applicable)

H W F -



Claimant

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL
Town Hall, Cotton Rd, Nuneaton CV11 5AA

(2) WARWICKSHIRE COUNTY COUNCIL
Shire Hall, Warwick CV34 4RL

Assigned to Master McCloud

Defendant(s)

(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

See attached for further details

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 Claimants seeks an injunction to protect the First Claimant's administrative area from further unauthorised encampments by the First to Fifty-Third Defendants, 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, [REDACTED]
[REDACTED]

See attached for further details

Court fee

£ 528.00

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.

N208 Claim form (CPR Part 8) (08.18)

© Crown copyright 2018

Claim no.

QB-2019-000616

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 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

Statement of Truth

~~*(I believe)~~ (The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement.

Full name William Maxwell Hunt Rose

Name of claimant's legal representative's firm Sharpe Pritchard LLP

signed 

*(Claimant)(Litigation friend)
(Legal representative)

position or office held Partner
(if signing on behalf of firm or company)

**delete as appropriate*

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.

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>

Application Notice

For help in completing this form please read the notes for guidance form N244 Notes

NOTICE OF HEARING
APPLICATION WILL BE HEARD AT THE
ROYAL COURTS OF JUSTICE, STRAND, LONDON
WC2A 2LL, UK
DATE 19/3/19
TIME TBC
IN A COURT TO BE CONFIRMED

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.)	Nuneaton & Bedworth Borough Council and Warwickshire County Council
Defendants (including ref.)	(1) Thomas Corcoran & Ors
Date	22 February 2019



1. What is your name or, if you are a solicitor, 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 injunction in the terms of the draft Order attached for the reasons set out in the witness statements of Robert Watson, Martyn Stephens, Katherine Moreton, Philip Richardson and Carol Ingleston and their exhibits.

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?

2

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. Witness statement of Robert Watson dated 15th February 2019 and its exhibits.
2. Witness statement of Martyn Stephens dated 19th February 2019 and its exhibits. ~~19~~²²
3. Witness statement of Katherine Ann Moreton dated 19th February 2019 and its exhibits.
4. Witness statement of Philip Richardson dated 19th February 2019 and its exhibits.
5. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.
6. *Witness statement of Sgt Andrew Scruton 0946 dated 6th March 2019 and exhibits.*

Statement of Truth

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

Signed  Dated 22 February 2019
Applicant's Solicitor

Full name William Maxwell Hunt Rose

Name of applicant's solicitor's firm Sharpe Pritchard LLP

Position or office held Partner
(if signing on behalf of firm or company)

11. Signature and address details

Signed  Dated 22 February 2019
Applicant's Solicitor

Position or office held Partner
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

Sharpe Pritchard LLP
Elm Yard
13-16 Elm Street
London

Postcode WC1X 0BJ

If applicable	
Phone no.	020 7405 4600
Fax no.	020 7831 1284
DX no.	353 London/Chancery Lane
Ref no.	WMHR/170.19

E-mail address wrose@sharpepritchard.co.uk

IN THE HIGH COURT OF JUSTICE

CLAIM NO:QB-2019-000616

QUEENS BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972, AND 187B TOWN AND
COUNTRY PLANNING ACT 1990

BEFORE MR JUSTICE DOVE

On the 22 day of February 2019

BETWEEN:

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL



Claimants

-and-

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

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

Defendants

ORDER

UPON HEARING Counsel for the Claimants without notice to the Defendants

AND UPON reading the witness statement of Philip Richardson, Director of Arts Leisure and
Democracy at Nuneaton and Bedworth Borough Council

IT IS ORDERED THAT:

1. The application for the injunction shall be listed before a Judge on Tuesday 19 March
2019 at 10.30am, to allow three clear days between service of the proceedings and

the hearing date for the application for the interim injunction with a 2 hour time estimate.

2. Pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 the Claimants have permission to serve the Defendants between 6.30am and 8pm during the week and between 7am and 4pm on a Saturday. Copies (as opposed to originals) of claim forms and applications served on a Saturday will be deemed served on the second working day after the date of service and copies (as opposed to originals) of claim forms and applications served after 4pm on a working day shall be deemed served on the second working day after the date of service.
3. In the event that the Claimants are unable to personally serve any of the 1st to 53rd Defendants, pursuant to CPR Part 6.14 and 6.15 the Claimant shall be permitted to serve any such Defendants by leaving a copy (as opposed to an original) of the application notice, claim form, draft order, and supporting evidence, in a clear transparent envelope and affixing the same to a caravan, mobile home, or, other vehicle, or, the front door of any residential premises, which in each case is reasonably believed to be owned or occupied by the said Defendants, or, by putting such copy documents through the letter box of any such residential premises. Any such copy documents served by this method will be deemed served the second working day after service of the application notice and claim form.
4. The Claimants shall be permitted pursuant to CPR Part 6.27 to serve the evidence in support of the Claim and application for an interim injunction by USB memory stick and shall provide any Defendant that requests hard copies of the same within 2 working days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the First Claimant's offices at Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA between the hours of 10am and 4pm Monday to Friday excluding public holidays.
5. The claim form and application notice shall be deemed served on Persons Unknown (Second Defendant) pursuant to CPR Part 6.14, 6.15, 6.27 and 6.27 by serving a copy (as opposed to an original) of the claim form, application notice and draft order on

all 141 sites identified in Schedule 3 of this Order by affixing them in a prominent place on the Land with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from the First Claimant's offices at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA.

6. The Defendants shall acknowledge service of the claim form 21 days after the date of deemed service and file any written evidence in support of the Defence by the same date.
7. The Claimants have permission to serve the Defendants with a sealed copy of this Order (as opposed to an original).

QUEEN'S BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990

Before

On the

BETWEEN

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

Claimants

-and-

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

Defendants

Draft ORDER - INTERIM.

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 1-9 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:

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 [REDACTED]
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.

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

6. 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 a planning inspector
7. 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
8. 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.
9. 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.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. 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.
12. 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.
13. 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.
14. 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)
15. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. 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

19. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
20. 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.
21. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
22. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

23. 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 (redacted for service) .

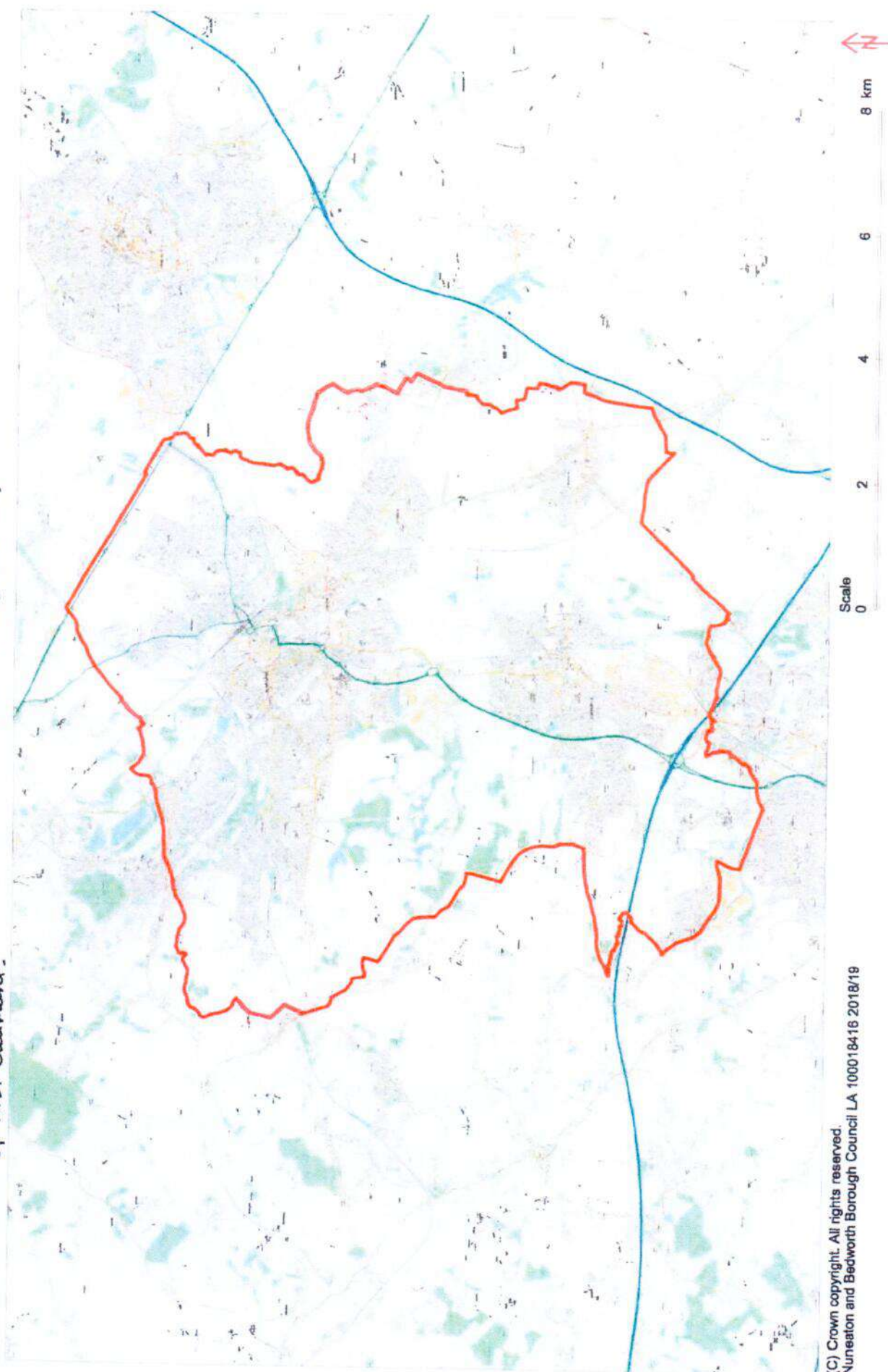
- (2) JESSICA DODD,
- (3) MICHAEL DOYLE
- (4) LUKE DELANEY
- (5) PATRICK McGINLEY,
- (6) ALPHONSUS McGINLEY
- (7) MICHAEL STOKES
- (8) MICHAEL STOKES
- (9) DENNIS STOKES
- (10) DENNIS STOKES (JNR)
- (11) BRIAN STOKES, 12a
- (12) JOHN MAUGHAN
- (13) TERRY MAUGHAN
- (14) TERRY MAUGHAN
- (15) PATRICK MAUGHAN
- (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

SCHEDULE 2 - Administrative Boundaries
of First Claimant.

Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA 100018416 2018/19

SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

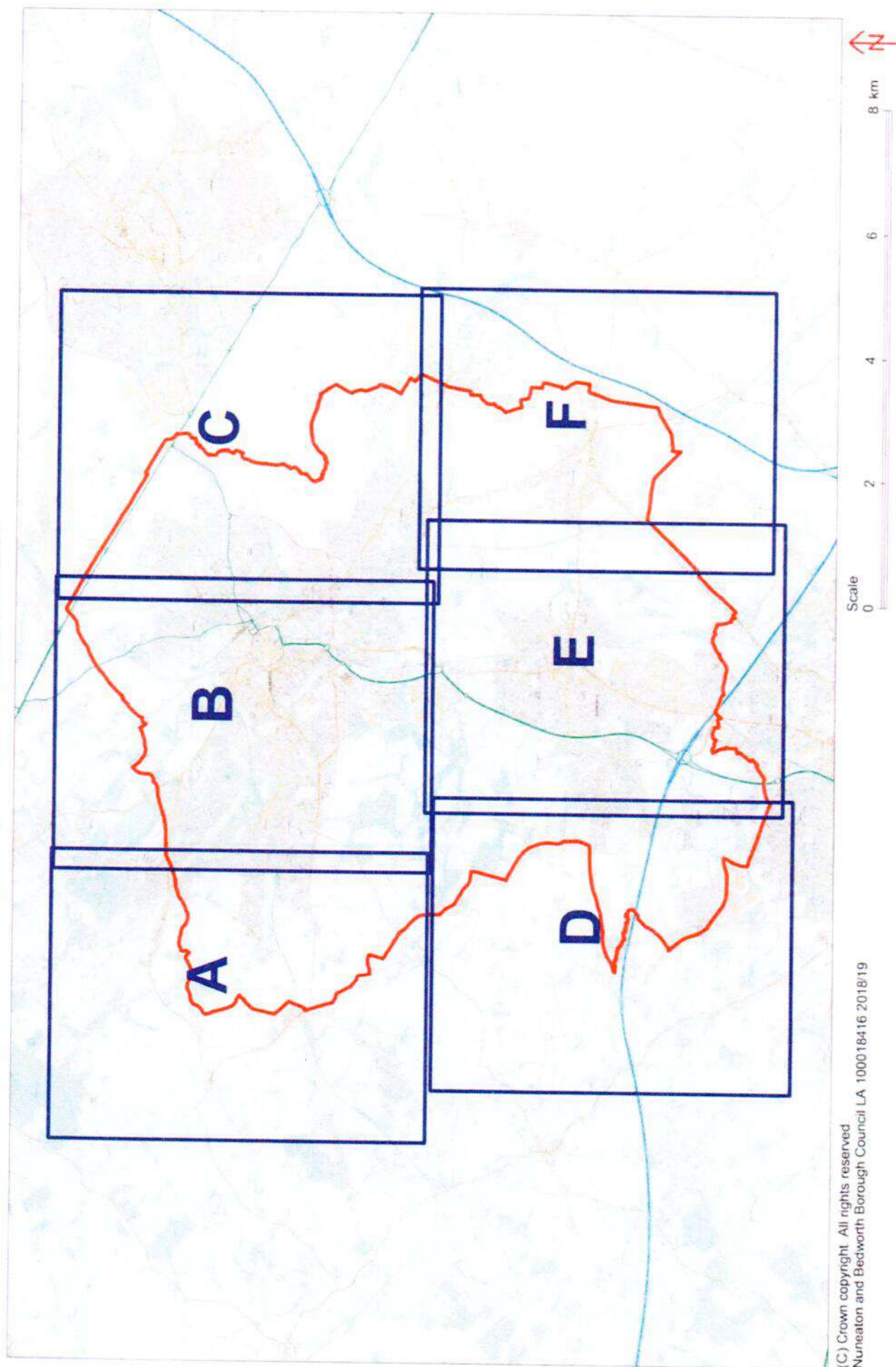
SITE NUMBER	SITE	± acres	POSTCODE	Land Owner	Title Number
1	Land on the north side of Corporation Street, Nuneaton	✓	CV11 9PZ	NBBC	WK447695
2	Recreation ground lying to the north of Queens Road, Nuneaton	✓	CV11 9PZ	NBBC	WK446269
3	Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton	✓	CV11 5ET	NBBC	WK447951/ WK240764/ WK236363
4	Land being car park on the south west side of Corporation Street, Nuneaton	✓	CV11 5DG	NBBC	WK449599
5	Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RU)	✓	CV11 5QE	NBBC	WK449585/ WK17804
6	Joinery works and adjacent premises fronting Regent Street, Nuneaton	✓	CV11 4BW	Private	WK398436
7	Land on the west and east sides of Vicarage Street, Nuneaton	✓	CV11 5DB	NBBC	WK450184
8	Revensky Park Clinic, Cotton Road, Nuneaton, (CV11 5TY)	✓	CV11 4BS	Private	WK366584
9	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	✓	CV11 5NE	NBBC	WK251517
10	Land at Church Street, Nuneaton	✓	CV11 4AS	NBBC	WK449976
11	Land and buildings lying to the East of Cotton Road	✓	CV11 5AA	NBBC	WK88582
12	Land at Vicarage Street, Nuneaton	✓	CV11 4AL	NBBC	WK478642
13	Land at Cotton Road, Nuneaton	✓	CV11 5AA	NBBC	WK450296
14	Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)	✓	CV11 5JF	NBBC	WK448678
15	Land to the south side of Bermudaland lying to the east and west of Coventry Road, Chivers Cotton/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	✓			WK446511/ WK284250/ WK345891
16	Recreation Ground at Easyboro Way, Nuneaton	✓		NBBC	
17	Land on south side of Luffworth Road, Nuneaton	✓	CV11 4PY	NBBC	WK449138
18	Land lying to the north east of Blenheim Way, Nuneaton. Land on the south east side of Croft Road	✓	CV11 6QA	NBBC	WK449027
19	Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton	✓	CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
20	Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC	WK342561/ WK355952
21	Land at Whitford Park, Haunchwood Road, Nuneaton, land lying to the north east of Haunchwood Road	✓	CV10 8PY	NBBC	WK447355
22	Land on the south side of Marston Lane, Nuneaton	✓	CV10 8DR	NBBC	WK130458/ WK447033
23	Splafields 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	WK448160
24	Park Road (Car Park) - land on the east side of Park Road, Bedworth	✓	CV12 8LH	NBBC	WK448256
25	Barnacle Lane EA - land to the south of Barnacle Lane, Bukington	✓		NBBC	WK448876/ WK246825/ WK448601
26	Bedworth, land at Barnacle Lane, Bukington, Bedworth	✓		NBBC	WK448511
27	Land at Brewer Road, Bukington, Bedworth and land at Euface Road, Bukington, Bedworth	✓	CV12 9RF	NBBC	WK448611/ WK448624(part)
28	Recreation Ground, Bedworth Road, Bukington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK448510/ WK448500
29	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC	WK449849
30	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden Avenue, Nuneaton	✓	CV10 9DJ	NBBC	WK430320
31	Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Drople, Queen Elizabeth Road, Nuneaton	✓	CV10 9DE	NBBC	WK448197/ WK448093
32	Land on the south side of Willow Road, Nuneaton	✓		NBBC	WK373679/ WK448013
33	Land on the West side of Blackberry Lane, Bedworth	✓	CV7 9EX	NBBC	WK447731
34	Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	✓	CV7 8NG	NBBC	WK137139
35	Land lying to the North East of Howat Road, Bedworth	✓		NBBC	WK450050
36	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry	✓		NBBC	WK124031
37	Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall	✓	CV7 9GZ	NBBC	WK36223
38	Land on the east side of Bucks Hill, Nuneaton	✓	CV10 9TD	NBBC	WK143991/ WK154857
39	Land south-east of Hickman Road, Galley Common, Nuneaton	✓	CV10 9SD	NBBC	WK358453

40	Nuneaton & North Works Group Riding for Disabled, Valley Road, Galleys Common (CV10 9NU) / land at Campden Close, Nuneaton and land at Galleys Common, Nuneaton (CV10 9NU)	*		CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
41	Land on the south west side of Selby Way, land on the north side of Frenham Drive and land on the north east side of Merlin Avenue, south east side of Friesland Rise, Whitford and land lying to the West of Bucks Hill	✓		CV10 9QF	NBBC	WK319146/ WK326554
42	Land on the east and west side of Sherbourne Avenue, Whitford	✓		-	NBBC	WK319145
43	Land on Galleys Common, Nuneaton, land at Galleys Common Nuneaton	✓		CV10 9PZ	NBBC	WK238447/ WK238145/ WK324522
44	Land on the south side of Pough Hill Road, Stockingford	✓		CV10 9JH	NBBC	WK234444
45	Land on the south side of Sherbourne Avenue, Nuneaton	*		CV12 0H0	NBBC	WK281821
46	Land on the south side of Carrigan Road, Bedworth	✓		CV12 0GE	Private	WK380708
47	Land and Buildings at Market End Farm and Orchard Farm, Smorrail Lane	✓		CV12 0UP	NBBC	WK449987
48	Land at Smorrail Lane, Bedworth	✓		CV10 8NN	NBBC	WK32497
49	Land on the North side of Arnsley Road, Stockingford	✓		CV10 9QG	NBBC	WK32497
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	✓		CV10 8LX	NBBC	WK448137/ WK448304/ WK317827
51	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓		CV12 8NW	NBBC	WK449032
52	Land lying to the West side of Blackhorse Road, Bedworth	✓		CV16 8TE	Private	WK394575
53	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 8BH	NBBC	WK169700/ WK448169/ WK250992/ WK448429
54	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓		CV12 8JT	NBBC	WK449032
55	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	*		CV12 8NN	NBBC	WK449032
56	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	*		CV12 8JT	NBBC	WK449032
57	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	*		CV12 8LG	NBBC	WK56034
58	Land at Albany Avenue, Bedworth	*			NBBC	WK448598
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	✓			NBBC	WK295888/ WK460241/ WK448169/ WK317827
60	Land on the north and south sides of Newton Road, Nuneaton	✓		CV12 0AL	NBBC	WK448846
61	Land lying to the north of Buttermere Avenue, Nuneaton	✓		CV11 6EP	NBBC	WK210986
62	Land at Herndon Grange, Nuneaton and land lying south and west of Carlone Drive, Nuneaton	*			NBBC	WK336798/ WK344607
63	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	*		CV11 6YH	NBBC	WK447654/ WK319762
64	Recreation Ground, The Long Shoot, Nuneaton, (CV11 6UH)	*		CV11 6UH	NBBC	WK446986
65	Land at Horseton Grange and land to the south of Hinckley Road, Nuneaton	✓		CV11 6YL	NBBC	WK336798/ WK447654
66	Land on the east side of Changebrook Close and land on the west and east side of Pallett Drive, Nuneaton	✓		-	NBBC	WK345480/ WK309653
67	Land on the south side of Church Lane, Nuneaton	✓		CV10 0H0	NBBC	WK448958
68	Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue, Nuneaton	✓		CV10 0BN	NBBC	WK448096/ WK448091
69	Land at Bradestone Road, Nuneaton	*			NBBC	WK450489
70	Land on the north side of Donnington Avenue, Nuneaton	✓			NBBC	WK452385
71	Land on the south side of Avenue Road, Nuneaton	✓			NBBC	WK452276
72	Land on the north side of Avenue Road, Nuneaton	✓			NBBC	WK448965
73	Land on the north side of Donnington Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	*			NBBC	WK449842/ WK449819
74	Land on the south west side of Marlborough Road, Nuneaton	*		CV11 5PQ	NBBC	WK447475
75	Land at Donnington Avenue, Nuneaton, land lying to the east of Ravelhoe Drive, Nuneaton, land on the east side of Marston Lane, Nuneaton and land on the east and west sides of Marston Lane, Nuneaton	✓		CV11 4BE	NBBC	WK452370/ WK452349/ WK449466/ WK449734
76	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/ WK344972
77	Nursery Park, Colton Road, Nuneaton	✓		CV11 5TV	NBBC	WK450206/ WK450173

78	Land at Sorrel Road, Nuneaton	✓	CV10 7AW	NBBBC	WK450035	NBBBC	WK450035
79	Riversley Park (Car Park), Riversley Park, Cotton Road, Nuneaton	✓	CV11 5TX	NBBBC	WK450206/ WK450173	NBBBC	WK450206/ WK450173
80	Land on the north side of Avenue Road, Nuneaton	✓	CV11 4LX	NBBBC	WK448965	NBBBC	WK448965
81	Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 6XA	NBBBC	WK370915	NBBBC	WK370915
82	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	✓	CV11 4PW	NBBBC	WK310067	NBBBC	WK310067
83	Land at Aucaia Crescent, Bedworth	✓		NBBBC	WK448428	NBBBC	WK448428
84	Land at Donna Close, Nuneaton	✓		NBBBC	WK452130	NBBBC	WK452130
85	Land lying to the West of Blackhorse Road, Bedworth	✓		Private	WK395375	Private	WK395375
86	Acleborough Fields Farm, Nuneaton and Land at Slingsby Close, Acleborough Fields Industrial Estate, Nuneaton	✓		WCC	WK271645/ WK451358	WCC	WK271645/ WK451358
87	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC	WK470015/ WK424958	WCC	WK470015/ WK424958
88	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH)	✓	CV7 9AH	Private	WK463676	Private	WK463676
89	Race Lays Infant School, Bedworth	✓	CV12 9AD	WCC	Unregistered	WCC	Unregistered
90	Goodyears End County First School, Bowling Green Lane, Bedworth (CV12 9HP)	✓	CV12 9HP	WCC	WK424315	WCC	WK424315
91	All Saints Bedworth C of E Primary School and Nursery, Bedworth	✓	CV12 9HP	WCC	Unregistered	WCC	Unregistered
92	Land on the West side of Weston Lane, Bulkington, Bedworth	✓	CV12 9RT	WCC	WK29421	WCC	WK29421
93	Land and buildings on the South side of Denwest Road, Bedworth	✓	CV12 8RT	Private	WK275063	Private	WK275063
94	Land lying to the East of Coventry Road, Bedworth	✓	CV7 9FJ	WCC	WK33092	WCC	WK33092
95	Keresley Newland Primary Academy and Keresley Newland School, Grove Lane, Keresley, Coventry (CV7 8LZ)	✓	CV7 8LZ	WCC	WK427632/ WK427707	WCC	WK427632/ WK427707
96	Land lying to the South of Smorral Lane, Goodyears End, Bedworth and Land lying to the South of Amoral Lane, Bedworth	✓	CV12 9HA	WCC	WK27604/ WK134659	WCC	WK27604/ WK134659
97	Wheelwright Lane Primary School, Ash Green, Coventry	✓	CV7 9HN	WCC	WK452567	WCC	WK452567
98	St Francis Roman Catholic School, Nicholas Street, Bedworth	✓	CV12 8UN	Private	WK262596	Private	WK262596
99	Land lying to the North of Rye Piece Ringway, Bedworth	✓		Private	WK476476	Private	WK476476
100	Land on the East Side of Nicholas Street, Bedworth	✓		WCC	WK171348	WCC	WK171348
101	Land on the South Side of Hayes Lane, Exhall, Bedworth	✓	CV7 9NS	WCC	WK171647	WCC	WK171647
102	St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PS)	✓	CV12 9PF	Private	WK461120	Private	WK461120
103	Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth, CV12 9PF	✓		Private	WK421207	Private	WK421207
104	St Michael's Primary School, Hazel Grove, Bedworth (CV12 9DA)	✓	CV12 9DA	Private	WK479304	Private	WK479304
105	Land adjoining St Thomas More School, Greenmoor Road, Nuneaton, CV10 7EX	✓	CV10 7EX	Private	WK478035	Private	WK478035
106	St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX	✓		Private	WK477630	Private	WK477630
107	Asbury High School, Greenmoor Road, Nuneaton	✓		Private	WK233418	Private	WK233418
108	Atterley C of E Infant School, Nuneaton	✓	CV11 5EL	WCC	Unregistered	WCC	Unregistered
109	All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)	✓	CV10 7AT	Private	WK461748	Private	WK461748
110	Land to the South of Tuttle Hill, Camp Hill, Nuneaton	✓	CV10 9QA	WCC	WK409218	WCC	WK409218
111	Land lying to the South of Gipsy Lane, Nuneaton	✓	CV11 4SE	WCC	WK170501	WCC	WK170501
112	Land at Jenkins Quarry, Tuttle Hill, Nuneaton	✓	CV10 9HU	WCC	WK33091	WCC	WK33091
113	Chivers Cotton First School, Frank Street, Nuneaton (CV11 5RB)	✓	CV11 5RB	WCC	WK424955	WCC	WK424955
114	Land lying to the west of Northumberland Avenue, Nuneaton	✓	CV10 8ER	WCC	WK239413	WCC	WK239413
115	Galley Common Infant School, Nuneaton	✓	CV10 9AZ	WCC	Unregistered	WCC	Unregistered
116	Land lying to the East of Higham Lane, Nuneaton	✓	CV11 6LS	WCC	WK205172	WCC	WK205172
117	Land on the south side of Skye Close, Nuneaton	✓	CV10 7LW	WCC	WK178493	WCC	WK178493
118	Madlemarch School, Nuneaton	✓	CV10 7BQ	WCC	Unregistered	WCC	Unregistered
119	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 8JY	WCC	WK476673	WCC	WK476673
120	Land and buildings on the South side of St Paul's Road, Nuneaton	✓	CV11 5TY	Private	WK360085	Private	WK360085
121	School at Cotton Road, Nuneaton	✓		Private	WK265311	Private	WK265311
122	Our Lady of the Angels Infant School and St Josephs RC First School, Cotton Road, Nuneaton, CV11 5TY	✓		Private	WK477543	Private	WK477543
123	Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton	✓	CV10 8NL	Private	WK470637	Private	WK470637
124	Land on the North Side of Ansley Road, Nuneaton	✓		Private	WK189376	Private	WK189376
125	Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR	✓		Private	WK471379	Private	WK471379
126	St Pauls C of E Primary School, Nuneaton	✓	CV10 8NH	Private	Unregistered	Private	Unregistered
127	Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton	✓	CV10 0JX	Private	WK480548	Private	WK480548
128	St Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX	✓		Private	WK469953	Private	WK469953
129	Gawwood Primary School, Morris Drive, Nuneaton, CV11 4QH	✓	CV11 4QH	Private	WK468047	Private	WK468047
130	Gawwood Secondary School, Morris Drive, Nuneaton	✓		Private	WK468048	Private	WK468048

101	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH	✓			WCC	WK333776
121	Playing field adjoining St Nicholas C of E Primary School, Windermere Avenue, Nuneaton CV11 6HJ	✓		CV11 6HJ	WCC	WK473130
122	Land on the East Side of Windermere Avenue, Nuneaton	✓			Private	WK331856
123	St Nicolas C of E First School, Windermere Avenue, Nuneaton, CV11 6HJ	✓			Private	WK473119
124	Land lying to the North East of Oakdene Crescent, Nuneaton	✓		CV10 6DR	WCC	WK349023/WK216447
125	Land at George Eliot School, Raveland Drive, Nuneaton, CV11 4QP	✓		CV11 4QP	Private	WK356966
126	Land on the North Side of Avenue Road, Nuneaton	✓		CV11 4LU	NBBG	WK448965
127	Elton College, Leicester Road, Nuneaton, CV11 6AA	✓		CV11 6AA	WCC	WK425535
128	Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	✓		CV10 0BJ	Private	WK465311
129	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓		CV11 4QH	WCC	WK468047/WK468048/WK333776
130	Land lying on the South of Abbey Road, Nuneaton and Nuneaton Academies	✓		CV10 7PD	WCC	WK375243/WK425489
131	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓		CV11 6BH	Private	WK428695
132	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓		CV11 4BE	Private	WK497842/WK497832
133	Bedeorth Heath Nursery School, Giebe Avenue, Bedworth, CV12 0DP	✓		CV12 0DP	WCC	WK526282
134	Exhall Grange School and Science College, Wheelwright Lane, Bedworth	✓			WCC	WK426690
135	Exhall Grange Special School, Wheelwright Lane, Coventry	✓			Private	WK440475
136	Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP	✓		CV7 9HP	Private	WK450950
137	North Side of Griff Lane, Nuneaton	✓		CV10 7SD	WCC	WK365844
138	Land lying to the West of Leicester Road, Nuneaton	✓		CV12 BAG	WCC	WK240628
139	Race Loyd Middle School, Barton Road, Bedworth, CV12 8HG	✓		CV12 8HG	Private	WK465341
140	Land and buildings on the south side of St Paul's Road, Nuneaton	✓			WCC	WK380945
141	Stockingford Junior and Infant School, Grove Road, Nuneaton (CV10 8J)	✓		CV10 8JH	WCC	WK42667
142	Land on the South West Side of Majer Crescent, Nuneaton	✓		CV11 4SQ	WCC	WK031140
143	Attleborough Mills, Attleborough Road, Nuneaton	✓			Private	WK256088
144	Manor Park Community School, Beaumont Road, Nuneaton	✓		CV11 5SS	Private	WK410022
145	St David's Way Hub, St David's Way, Bermuda Park, Nuneaton	✓		CV10 7SD	Private	WK447390
146	Halfords - land and buildings on the south side of Newtown Road, Nuneaton	✓		CV11 5UT	Private	WK390514
147	Bermuda Road Community Centre, Bermuda Road, Nuneaton	✓		CV10 7HU	Private	WK424279

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



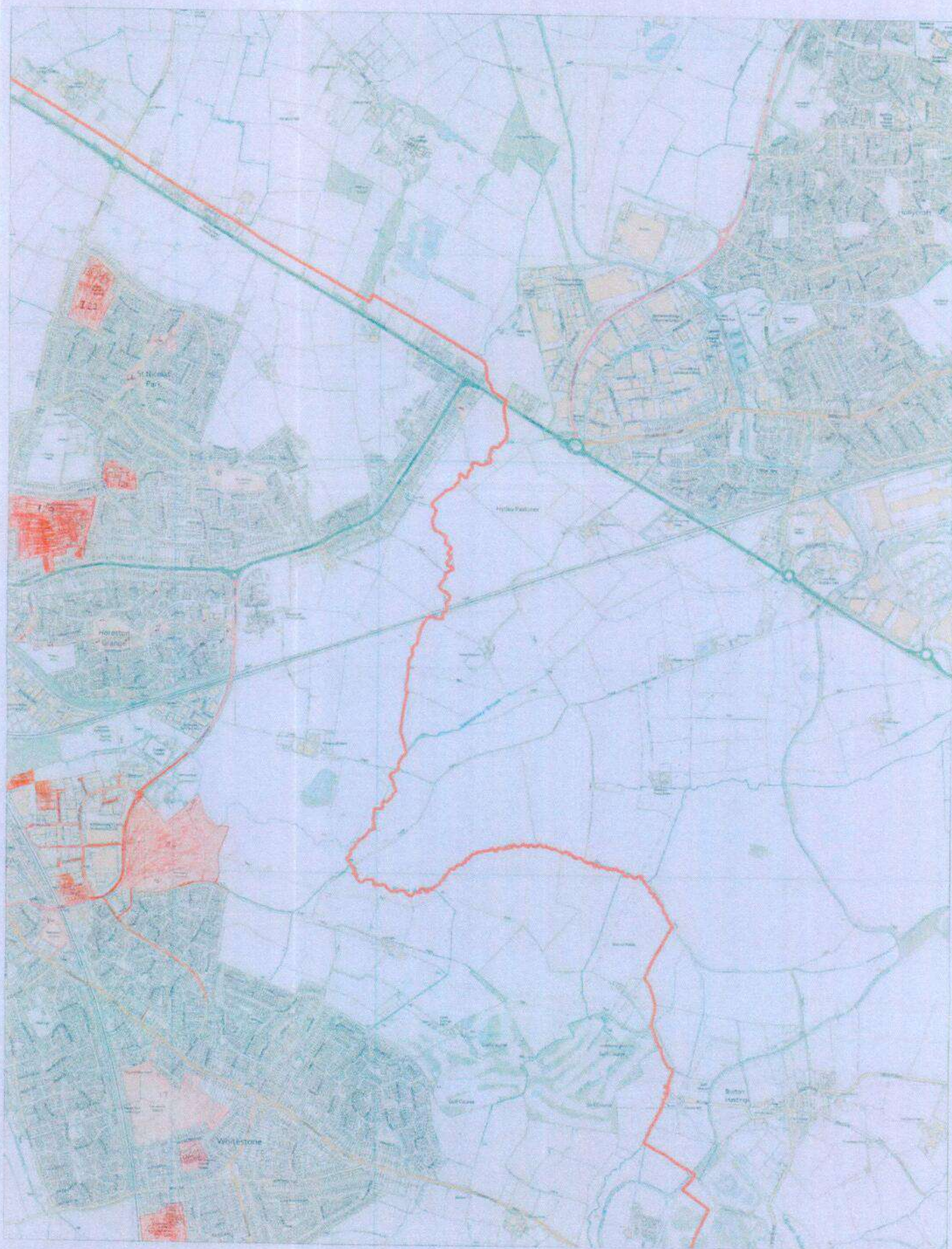
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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Scale
0 250 500 750 1000 m



C

Northeast Nuneaton



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Scale
0 250 500 750 1000 m



D

Southwest Bedworth



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100018416 2018/19

Scale
0 250 500 750 1000 m

↑
147

E

South of Bedworth



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100018416 2018/19

Scale
0 250 500 750 1000 m

F

Southeast Bedworth



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

On the

BETWEEN

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

Claimants

-and-

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

Defendants

Draft ORDER - FINAL .

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 CLAIM FOR THE FINAL INJUNCTION AND DISPOSAL OF THE CLAIM 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 1-9 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:

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 [REDACTED]
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.

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

6. 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 a planning inspector
7. 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
8. 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.
9. 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.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. 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.
12. 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.
13. 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.
14. 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)
15. Costs to be assessed in the sum of [ENTER SUM].

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. 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

19. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.
20. 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.
21. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
22. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

23. 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).

Claimant
John Andrew Ingram
First
15th March 2019
"JAI 1-JAI 3"

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

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 the Honourable Mr Justice Dove dated 22nd February 2019, between 07.30hrs on Monday 11th March 2019 and 15.50 hrs on Wednesday 13th March 2019 I effected service of 145 copies of the said Order 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 the Honourable Mr Justice Dove dated 22nd February 2019 and the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter from my instructing solicitors dated 4th March 2019, in a sealed transparent waterproof envelope and by affixing all 145 copies in prominent positions at each vehicular 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 "JAI1"

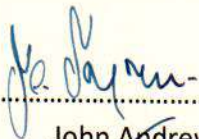
3. True copies of of the Order of the Honourable Mr Justice Dove dated 22nd February 2019 and the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22nd February 2019; Sealed Order dated 22nd February 2019; Draft Order – Interim; Schedule 1 - List of defendants; Schedule 2 – Map of the Borough; Schedule 3 – List of Sites and Map for Persons unknown; Draft Order – Final and a covering letter from my instructing solicitors dated 4th March 2019, so served by me are now shown to me marked "JAI 2".

4. Copies of photographs taken by me, by only way of example of 5 out of 145 serves performed are now produced and shown to me in a bundle marked "JAI 3"

Statement of Truth

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

Signed:



John Andrew Ingram

Dated: 15th March 2019

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

"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: 15th March 2019