### **KING'S BENCH DIVISION**

BETWEEN:-

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

**Claimants** 

-and-

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

**Defendants** 

EVIDENCE OF SERVICE BUNDLE	
EVIDENCE OF SERVICE BUNDLE	

	<u>Document</u>	Page Nos.
	Statements of Service of original Claim Form on individuals	
1.	Statement of Peter Newham dated 14 March 2019 and exhibit PN1	3-41
	[service on Thomas Maughan (22) and Bernie Sweeney (41)]	
2.	Statement of Alistair James Mellor dated 14 March 2019 and exhibit AJM1	42-78
	[service on Mike McDonaugh (31)]	
3.	Statement of Paul Tietjen dated 14 March 2019 and exhibit PT1	79-115
	[service on John Mongan (23) and Michael Ward (38)]	
4.	Statement of Harry Michael Mellor dated 15 March 2019 and exhibits HMM1 and HMM2	116-153
	[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 McDonaugh (27), Bernie McDonaugh (29), John McDonaugh (30), Martin McDonaugh (32), Aaron McDonaugh (33), Winnie McDonaugh (35), Kathleen Ward (39), John Connors (42)]	
	Statements of Service of original Claim Form on Sites	
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

	Statements of Service of Injunction Order of 19 March 2019 on individuals	
7.	Second Statement of Paul Tietjen dated 26 April 2019 and exhibit PT1	242-267
	[service on John Mongan (23) and Michael Ward (38)]	
8.	Second Statement of Alistair James Mellor dated 29 April 2019 and exhibit AJM1	268-293
	[service on Mike McDonaugh (31)]	
9.	Second Statement of Harry Michael Mellor dated 23 May 2019 and exhibits HMM1 to HMM3	294-321
	[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 McDonaugh (27), Bernard McDonaugh (29), John McDonaugh (30), Martin McDonaugh (32), Aaron McDonaugh (33), Winnie McDonaugh (35), Kathleen Ward (39), Bernie Sweeney (41), John Connors (42)]	
	Statements of Service of Injunction Order of 19 March 2019 on sites	
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
	Service of Amended Claim Form dated 1 September 2021	
12.	Statement of Philip Richardson dated 1 October 2021 and exhibits PR1 and PR2	394-651
	Service of Re-Amended Claim Form pursuant to Order of MJ Linden dated 23 May 2022	
13.	Statement of Waheeda Sheikh dated 9 December 2024 and exhibits WS/1 to WS/7	652-687
	[service on sites and named Defendants]	
	Service of Orders dated 22 December 2023 and 27 March 2024	
14.	Statement of Mannie Dhaliwal 26 March 2024 and exhibits MD/1 and MD2	688-734
	[service on sites]	
15.	Statement of Josephine Pryse Hawkins dated 1 October 2024	735-736
	[service on sites]	
16.	Statement of Amy Pittam dated 9 December 2024 and exhibits AP/1 to AP/6	737-793
	[service on sites and named Defendants]	

Claimant Peter Newman First 14<sup>th</sup> March 2019 "PN1"

### 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

### 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 9<sup>th</sup> 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 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> 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 9<sup>th</sup> 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 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> March 2019; by leaving the documents at 11 Kanes Hill Caravan Park, Botley Road, Southampton SO19 OSA. At the time of service Thomas Maughan confirmed that the defendant, Bernie Sweenie 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 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> 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) WARCWICKSHIRE 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



### Nuneaton and Bedworth Borough Council Town Hall, Coton Road, Nuneaton Warwickshire CV11 5AA

www.nuneatonandbedworth.gov.uk 024 7637 6376

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
- Draft Interim Injunction Order and attached Schedules to be applied for at the hearing on 19<sup>th</sup> March 2019
- 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



### Nuneaton and Bedworth Borough Council Town Hall, Coton Road, Nuneaton Warwickshire CV11 5AA

www.nuneatonandbedworth.gov.uk 024 7637 6376

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

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
- Draft Interim Injunction Order and attached Schedules to be applied for at the hearing on 19<sup>th</sup> 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

Claim no.

QB-2019-000616

Fee Account no.

Help with Fees -Ref no. (if applicable)

Claimant

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

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



Defendant(s)

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

(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

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



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.

96-2019-000616

### 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 issued 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.
- 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

Sta	ten	nent	OT	iruth

\*(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 www M. -. m

\*(Claimant)(Litigation friend) (Legal representative) position or office heldpartner

(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

APPLICATION WILL BE HEARD AT THE ROYAL COLRECT RESIDENCE STRAND TO SOON WC2A 321 9 13 1 9 TIME TOCK TO BE CONFIRMED

Claim no.	QB-2019-000616
Fee Account no.	PBA0087028
Warrant no.	
Claimant (including ref.)	Nuneaton & Bedworth Borough Council and Warwickshire County Council
Defendants (including ref.)	(1) Thomas Corcoran & Ors
Date	227 COUNTY 2019

	DATE CLIST	(including ref.)	
	IN A COURT TO BE CONFIRMED	Date	22 February 2019
1.	What is your name or, if you are a solicitor, the name of your f	irm?	They By Fell
	Sharpe Pritchard LLP	( 5	* 1 FEB 2019 .
2.	Are you a Claimant Defendant	Legal Representat	BENCH DIVISOR
	Other (please specify)		
	If you are a solicitor whom do you represent Clair	nant	
3.	What order are you asking the court to make and why?		
	The Claimant seeks an injunction in the terms of the draft Or statements of Robert Watson, Martyn Stephens, Katherine N their exhibits.		
4.	Have you attached a draft of the order you are applying for		No
5.	How do you want to have this application dealt with?	at a hearing	ng without a hearing
_			hone 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.		

the attached witness sta	itement	
the statement of case		
the evidence set out in t	he box below	
necessary, please continue on a separate sheet		
<ol> <li>Witness statement of Robert Watson dated 15th Feb</li> <li>Witness statement of Martyn Stephens dated 19th F</li> <li>Witness statement of Katherine Ann Moreton dated</li> <li>Witness statement of Philip Richardson dated 19th F</li> <li>Witness statement of Carol Ingleston dated 15th Feb</li> <li>Witness Statement of Soft Andrew Sc</li> </ol>	ebruary 2019 and its I 19 <sup>th</sup> February 2019 ebruary 2019 and its gruary 2019 and its e	exhibits. * 2 and its exhibits. s exhibits. xhibits.
tatement of Truth		CENIGI
he applicant believes that the facts stated in this section (a	nd any continuation	sheets) are true.
Applicant's Solicitor	Dated 22 Febr	uary 2019
ull name William Maxwell Hunt Rose		
lame of applicant's solicitor's firm Sharpe Pritchard LLP		
osition or office held Partner		
f signing on behalf of firm or company)		
1 Signature and address details		A CONTRACTOR OF THE CONTRACTOR
Signature and address details		
Signed 6 m m - m	Dated 22 Feb	oruary 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 applicat	ion should be sent	
harpe Pritchard LLP		If applicable
lm Yard	Phone no.	020 7405 4600
3-16 Elm Street	Fax no.	020 7831 1284
ondon	DX no.	353 London/Chancery Lane
Postcode WC1X 0BJ	Ref no.	WMHR/170.19
-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

U	CI	10	aı	H

### 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:

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.

- 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 Sazurday. 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 workings days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the 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.
- The claim form and application notice shall be deemed served on Persons Unknown (Second Defendant) pursuant to CFR 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.

- 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.
- 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 BROUGH 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:

- 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
- 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
- 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.
- 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:

- 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.
- 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

 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

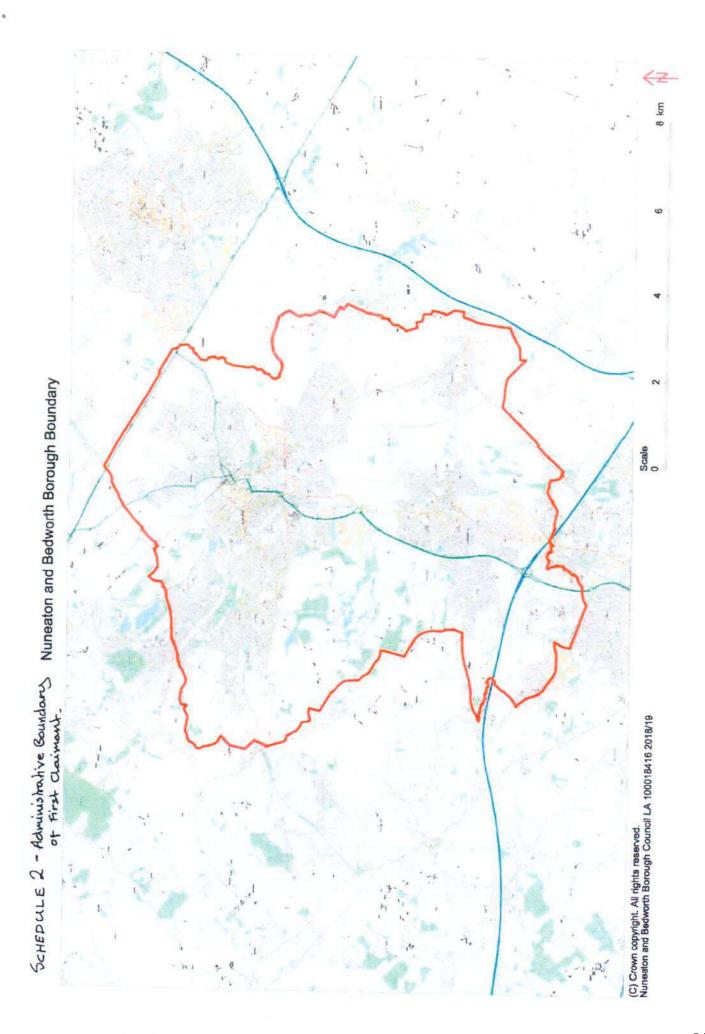
# List of Defendants and their addresses (redacted for service).

- (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

WE / X424-409B / 229314

- (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 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

						WK446511) WK28250/ WK345891			WK48764/ WK448021/ WK448237 (pert)	/ WK355952		VWK447033			WK448876/ WKZ46825/ WK448801		WK448513/ WK448524(part)	V VIX.448500			1 WK448093	V V/K448013						/ WK154857	
	WK449976	WK88582	WK426642	WK450296	WK448678	WK446511/1	WK449338	VAK449027	WK48784/ W	WK342561/ WK355952	WK#47355	WK130456/ WK447033	WK448160	WK448256	WK448876-1	WK448511	WK448611/1	WK448510/ WK448500	WK449849	VFK439320	WK448197/ WK448093	WK373679/ WK448013	WX447731	WK137139	WK450050	WK124031	WK336223	WK143991/ WK154857	WK358453
NEEDC		NBBC W	_	-	NBBC W	NABAC S	-	_	NBBC W	NBBC W	1	NBBC W	7	NBBC W	NBBC W	NBBC W	NBBC W	NBBC W	MBBC W	NBBC W	NBBC W	W NBBC		NBBC M	NBBC W	4	NBBC N	NBBC N	
Z	CV114AS NE	CV11 SAA NE	CV114AL NE	CV11 SAA NE		2	CV114PY NE		CV10 7EL NE	2	CV10 8DS NE	CV10 8PV NE	H	ž	CV12 BNF NE	CV12 BLH NE	ž	CV12 9RF NE	CV12 9LT NE		CV10 90J	CV10 9DE NE	Z	Ž	CV7 9EX	H	N	CV7 9GZ NE	

28 Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12-9PZ)
29 Land on the south west side of Ouese Tellabeth Road, Ninhaition
Land on south east side of Creen Later Nuneation and land lying on the
30 least side of Ramsdern Avenue, Nuneation and Land lying on the

Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington 26 Bedworth, land at Barnacle Lane, Bulkington, Bedworth Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road.

27 Bulkington, Bedworth

25 Park Road (Car Park) - land on the east side of Park Road, Bedworth

Spitaffelds 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the north-west side of Rye Piece Ringway, Bedwo 22 Zion Chaple, High Street Bedworth

WK447951/ WK240764/ WK236363

NBBC NBBC

CV11 SFZ CV11 SET

Receivation ground lying to the north of Queens Road Nurreation Land on the north wast of Vernoris Lane and land lying to the South West of Midland Road, Nurreation

and on the north side of Corporation Street. Numeration

SITE NUMBER

HOSICODE

saune g-

WK449585/ WK178804

WK398436

CV11 SQE

Joinery works and adjacent premises fronting Regent Street, Nuneaton

Riversisy Park Clinic, Cotton Road, Numerston, (CV11.5TY)
Land and buildings on the east side of Broad Street, the north side of

Oueen's Road and the south west side of Abbey Street Land at Church Street, Nunsation

11 Land and buildings lying to the East of Coton Road 12 Land at Vicarage Street. Nuneaton

Land at Coton Road, Nurreaton

and on the west and east sides of Vicarage Street, Nuneston

Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ)

and being car park on the south west side of Corporation Street

WK251517

CV11 SNE

14 Meadow Court, Meadow Street, Numeation, (CV11.5.JE). Lizard by the Court, Meadow Street, Numeation (CV11.5.JE) Land to the Court, side of Bermudalland styring to the asst and west of Covering Road. Chilwes Ceterfand on the west side of a road leading from Covering to Numeation and a balancing lake and land to the south of

is Bermuda Road, Nuneaton is Recreation Ground at Easyboro Way, Nuneaton 17 Land on south side of Lutterworth Road. Nuneaton

Land lying to the north east of Braemer Way, Nureation. Land on the south west and north east sides of Greenmoor Road & Land lying to the 18 south east side of cuts road.

South east side of cuts road.

It and lying to be east of Westbury Road and Land lying to the North of eigherbert Street. Nureation.

Land at Whittieford Park, Haunchwood Road Nuneaton, land lying to the

21 Inorth east of Haunchwood Road 22 Land on the south side of Marston Lane. Nurreation 23 Land on the north side of Marston Lane, Bedworth

CV11 4BS

WK449599

36 Land lying to the North West of Rowley's Green Lane, Exhall, Coventry

Land and buildings on the east side of Camp Hill Drive Camp Hill.

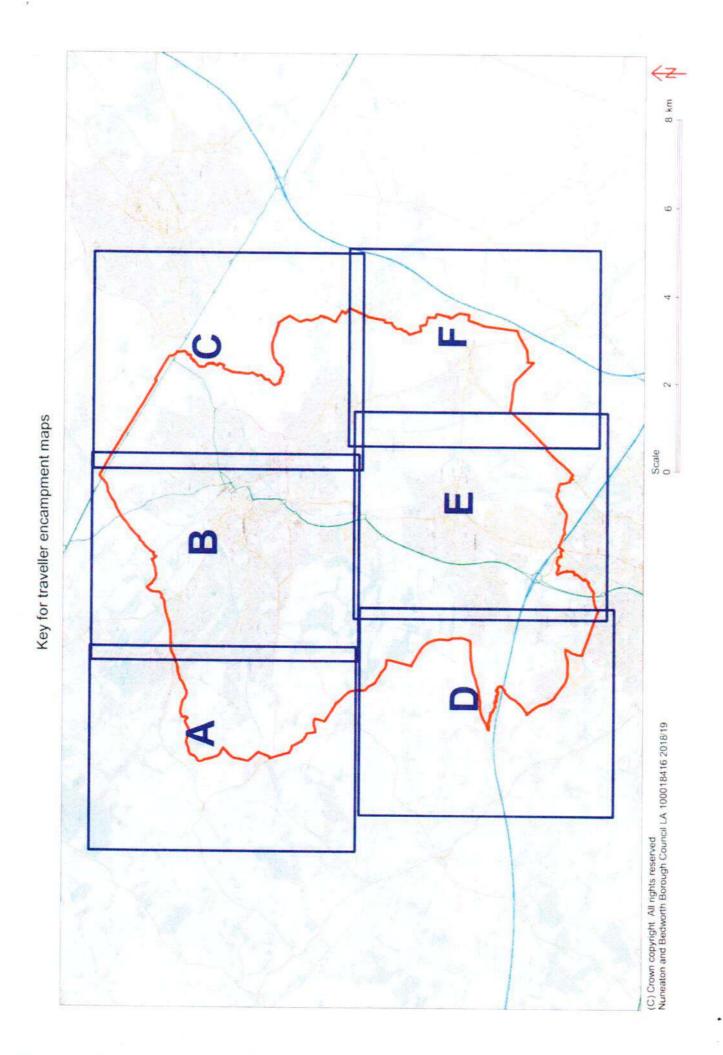
3) Nureation and land at The Dringle Queen Exatteth Road, Nureation
32 Land on the south side of Willow Road, Nureation
31 Land on the West side of Blackerry Lane Bedworth
Heckley Recreational Ground: Land Ying to the north of School Lane

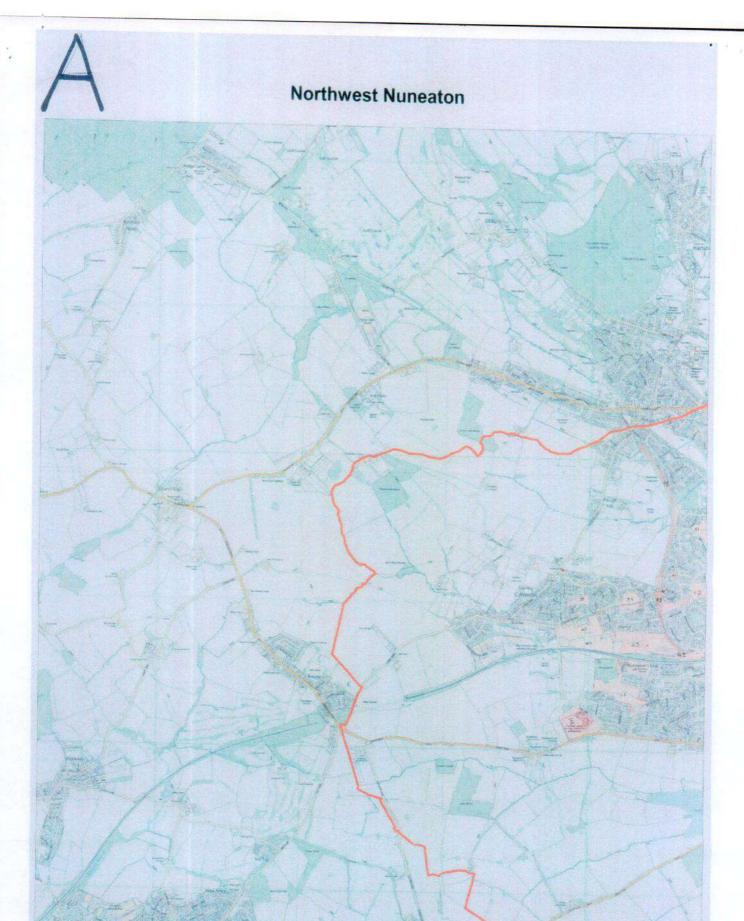
34 Exhall, Coventry 35 Land lying to the North East of Howat Road, Bedworth Land on the South side of Vicerage Lane, Exhall, Bedworth and Land.
31 lying to the West of St Glass Read, Embal.
32 Land on the east side of Bucks Hill, Numerion.
33 Land south-east of Hickman Road, Galley Common, Numerion.

Nutreation & Yorlin Water Subgranding to United to Variory Young, Common (CV 10 9/10)   Jan 2 Campbell Close. Nutreation and land at all Campbell Close. Nutreation and land at all Campbell Close. Nutreation (CV 10 9/10)		CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
Land on the south west side of Selby Way. Iand on the north side of Frentham Drive and land on the north east side of Metin Avenue, south east side of Metin Avenue, south east side of Freesland Rise. Whitterford and land lying to the West of Avenue and Land Lying to the West of		CV10 90F	NBBC	WW.319146/ WW.326554
			NBBC	WK319145
		9-10-10 Page 1	Stoom	WK238447/ WK238145/ WK324522
		CAND BAC	MODE	1806274444
44 Land on the sough side of president Avenue, received		CV12 0HD	NBBC	WK281821
Land and Buildings at Market End Farm and Orchard Farm, Smorrall				CASCAROTOR
46 Lane	,	CV12 0GE	Private	No. i no contrata
47 Land at Smorrall Lane, Bedworth		CV12 BLP	NBBK	WK44996/
48 Land on the North side of Ansiey Road. Stockingfold Kingswood Road Rec. Land on the North side of Ansiey Road.		CATORNA	NBBC	WKSSABY
49 Stockingford Land on the west side of Westbury Road. Nuneaton and land on the	*	CV10 90G	NBBK.	WAS ALL TO THE MERCINE WAS TO THE TOTAL WAS A STATE OF THE TOTAL WAS TO TH
north-east side of Grove Hoad, Numeaton and land lying to the work of Numeaton Road.		CV10 BJX	NBBC	A Long Contract of
		CV12 8NW	NBBC	WK449032
sol, and lying to the West side of Blackhorse Road, Bedworth		CV6 67E	Private	WK394575
				WK169700) WK448169/ WK250992/ WK448429
53 Centre, Johnson Road		CV12 98H	NBBC	
Miners Westare Fark (Lat Fark) - Miners Westare Fark, rye Frenk 54 Ringway, Bedworth		CV12 8JT	NBBC	WK449032
Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece & Bonoure, Barkeneth		CV12 BNN	NBBC	WK449032
Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece	*	CV12 8JT	NBBC	VPK449032
	*	CV12 83G	NOD!	WK366034
57 Bulkington Road Bedworth			NBBC	WK448598
land to the west of Nuneation Road/Alex Wilson Centre 34 Nuneation so Road Bedworth and land to the west of Nuneation Road			NBBC	WK295888/ WK460024/ WK448169/ WK31782/
		CV12 DAL	NBBC	WK449846
		CV116EP	NB80	WK210986
Land at Horseton Grange, Nuneaton and land lying south and west of 62 Cambome Drive, Nuneaton	X		NBBC	WK336758/ WK344607
Land lying to the south of Hinckley Road. Nuneaton and land to the west		CV116YB	NBBC	WK447654/ WK319282
		CVIT 6JH	NBBC	WK446986
Land at Horseton Stange and land to the south of Hindkley Road, as Numeration		CV116YL	NBBC	WK338798/ WK447654
Land on the east side of Changebrook Close and land on the west and				WK345480r WK309853
66 east side of Pallett Drive, Nuneaton		Original Control	NBBK	0.000
67 Land on the south side of Church Lane, Nuneation		CANDUMO	NOON	WW-940300
Land on the north star or produces now, where and a North side of Ryde Avenue, Nuneaton		CV10 08N	NBBC	WK448096/ WK46091
69 Land at Bradestone Road, Nuneaton			NBBC	WK450499
10 Land on the north side of Donnithorne Avenue, Nuneaton	*		NBBC	WK452385
Land on the south side of Avenue Road, Nuneaton			NEED	WINALRES
Land on the north side of Donnthorne Avenue. Nurreation and land at				WK449842! WK449819
73 Kriebley Crescent, Nuneaton		1000	NBBC	
4. Land on the south-west side of Marborough Road, Nuneaton	×	CV115PQ	NBBC	WK44/4/5
Land at Connithome Avenue, Nuneaton, land lying to the east of Raveitor Drive, Nameaton, land on the east side of Mariton Lane, Nuneaton and 5s, Land on the east and west sides of Mariton Lane. Nuneaton	8	CV114RE	NBBC	WRA52370' WRA52349' WRA49466' WRA49734
		CV10 78X	NBBC	WK448537/ WK344972
		THE R. P. LEWIS CO., LANSING, MICH.		

		ALC: TAKE	200000	COLUMN ACTION AC
79 Riversiey Park (Car Park) - Riversiey Park, Coton Road, Nuneaton		N. 10 . 10 . 10 . 10 . 10 . 10 . 10 . 10	4-	W. W. A. A. B. C.
Land on the north side of Avenue Road, Nuneation		CV11 6XA		WK370915
THE DESIGNATION OF THE PROPERTY OF THE PROPERT				
Trinity Court Flats (Car Park) - land on the West side of Highfield Road,		CV11 4PW	NBBC	WK310067
Nuneaton				WK448428
Contract of the Chart States			NBBC	WK452330
On Land Man to the Man of Charleston Door Bedandth	*		Private	WK394575
Attended on Fields Farm Nuneaton and Land at Singsby Close.				
Affleborough Fields Industrial Estate, Nuneaton			WCC	WK273545/ WK455198
s., Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)		CV12 9EA	WCC	WKA70015/WKA24958
DIADICAL CONTRACTOR OF THE PROPERTY OF THE PRO		CV7 9AH	•	
Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV 19AH)			- 14	WK463626
Race Leys Infant School, Bedworth		CV12 8AD	WCC	Unrepaired
Goodyers End County First School, Bowling Green Lane, Bedworth,		CV12 0HP	WCC	WK42433
(CV12 DHP)		CV12 9HP	1	Unregistered
All Carries December 1, Dr. P. Principy Octability and Distriction Background		CV12 9RT		WK79471
Land and buildings on the South aids of Dement Road Bedworth		CV12 8RT	Private	WK225063
Canal hand to the Part of Coventry Road Redworth		CVP 9F.3	WCC	WK33092
Kerestey Newland Primary Academy and Kerestey Newland School.		CV7 R.IZ		
Grove Lane, Keresley, Coverstry, (CV7 8JZ)		700 140	WCC	WK427632/WK477207
Land lying to the South of Smorral Lane. Goodyears End, Bedworth and		CV12 DHA	WCC	WK27604/WK134659
Land Ning to the South of smortal Lane Bedworth		CV7 SHIN	WCC	WK425267
Wheelwright Lane Primary School Ash Green, Cuvernay		CV12 BJN	Private	Private wxz62596
St Francis Koman Catholic School, Nicholas Street, December			Private	Private WK476476
Land lying to the footh of Rye Prece Kingway, bedward			WCC	Wx171388
Land on the trad order of National School December 1	-	CV7 9NS	WCC	WX171647
St. James Church of England School: Barbridge Road, Bulkington.	-	300 C+0-2		
Bedworth (CV12 9PF)		1 2 3 1 A 1	Private	WK461720
Playing fields at St. James Church of England Junior School, Barbridge			Delusta	CANON 2 2 2 2 2 3
Road, Bulkington, Bedworth, CV12 9PF		Course Great	December	CANADA PERIOR
St Michael's Primary School, Hazel Grove. Bedworth. (CV12 9DA)		CV12 90A	PTIVATE	WK4/3304
Land adjoining St Thomas More School, Greenmoor Road, Nurreaton,		CV10 7EX	Private	WK478035
Co. Thomas More Catholic School Greenmont Road Mineaton CV18				
7EX			Private	WK477630
Arbury High School Greenmoor Road, Nuneaton			Private	WK233418
103 Abbey Cof E Infant School, Nuneaton	*	CV11 5EL	WCC	Unregistered
		CV10 7AT	Describe	AND 26.1 7.58
		AVI 00.0	WILL	CONTROL OF THE PERSON OF THE P
	-	CVICE	MCC	WK3 20501
Land lying to the South of Gi		CV10 044)	WCC	Wk393091
107 Land at Judkins Quary Tuttle Hig. Nuneaton		COURT CAR	WCC	100,000,000,000
Chilvers Coton First School, Frank Street, Nunear		CV10 RFR	MCC	WK239411
1031 Land him to the west of fronthumberland Avenue, Numerical		CV10 9NZ	MCC	Unregistered
		CV11 6JS	WCC	WK205172
111 Land lying to the East of Highlan Lane, Numerical		CV10 7LW	WCC	WK178493
114 Land on the south side of take Labe, marketon		CV10 789	WCC	Unregistered
Specialization and Infant School Grove Road Nuneaton (CV10		WOUND BLOW	0.0000	
114 BJY)			WCC	WK426673
Land and buildings on the south side of St Paur's Road, Numeaton			WCC	WX380085
115 School at Coton Road, Nuheaton		CVITSTY	Private	W4226511
Cur Lady of the Angels Infant School and St. Josephs RC First School.			Private	WW677543
Coton Road, Nuneation, CVT1 51 Y  Dark Lane Bolman School Park Lane Nuneation (CV10 8; U) and land		DANCE CALL		
116 on the North side of Ansley Road Numeaton		CATO BML	Private	
			Private	WK189736
Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11			Private	WK471379
114 SLR	×	CV10 8NH		Unregistered
150 J. Page L. Of C. Pinnery October 140 Days Numerical		CV10 0.0X	Private	WK480568
St. Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneation,			Section Section	
CV10 QJX			DIRKUL .	WASHINGS
The same of the sa		1. 1. 10 m. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.		The section of the se

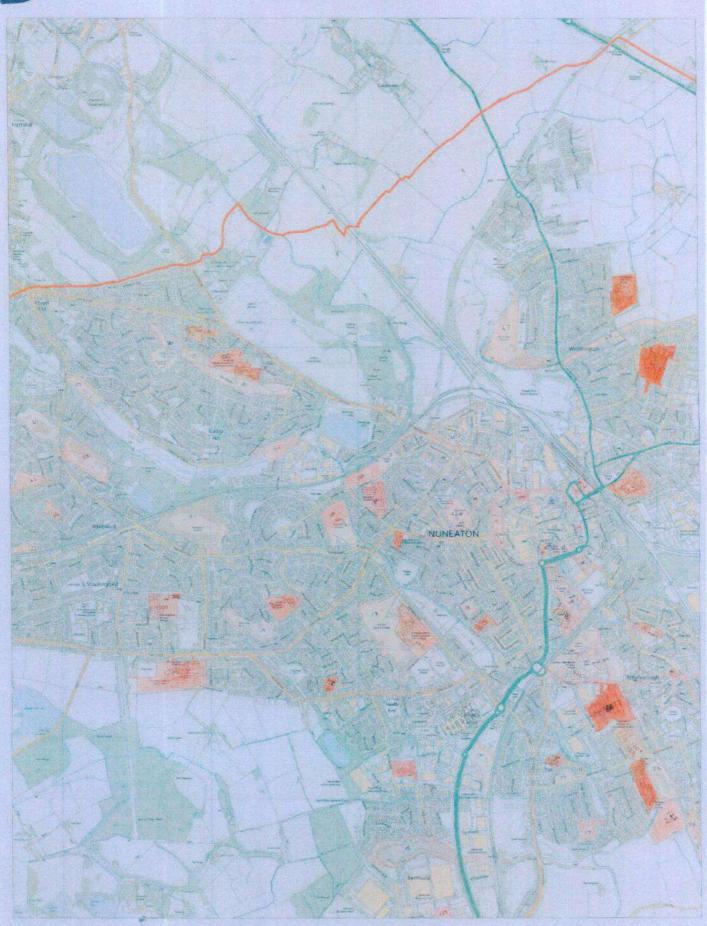
Clakwood Primary School, Morris Drive, Nuneaton, CV11 4QH		WCC	WK213776
Playing felid adjoining St Nicholas C of E Primary School, Windemere x 121 Aversue. Numeation CV11 65tJ	CVITGE	WCC	WK4733.3G
Land on the East Side of Windermere Avenue, Nuneaton		Private	WK131856
St Nicolas C of E First School, Windermere Avenue, Nuneaton, CV11 BHJ		Private	WK473119
Land lying to the North East of Dakdene Crescent, Nuneaton	CV10 0DR	WCC	WK149023/WK216447
123 Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP	CV11 4GP	Private	WK458966
24 Land on the North Side of Avenue Road, Nuneaton	CV114LU	NBBC	WK448965
125 Etone College Leicester Road, Numeaton, CV11 5AA	CV116AA	WCC	WK425515
126 Higham Lane School Higham Lane, Nuneaton, CV10 083	CV10 083	Private	WK465 311
127 Cakwood Primary and Secondary School, Morrs Drive, Nuneaton, CV11 4	CV11 40H	WCC	WK458047/WK458048/WK233776
128 Land Wing on the South of Arbury Road, Nuneaton and Nuneaton Academ Y	CV10 7PD	WCC	WK175243/WK425489
North Warwickshire and Hinckley College, Hinckley Road, Nuneston, 729 CV11 68H	CV11 68H	Private	WK428695
130 King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	CV11 4BE	Private	WKA97842/WK497832
131 Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP .	CV12 00P	WCC	WK426282
32 Exhall Grange School and Science College, Wheelwright Lane, Bedworth		WCC	WK426690
Exhall Grange Special School, Wheelwright Lane, Coventry		Private	WK440475
Land at Exhall Grange School, Wheelwright Lane, Covertry, CV7 9HP	CV7 9HP	Private	WK450903
33 North Side of Griff Lane, Nuneaton	CV10 7SD	WCC	WK365844
134 Land Wing to the West of Leicester Road, Numeaton	CV12 8AG	WCC	WK740628
Race Leys Middle School, Barton Road, Bedworth, CV12 8HG	CV12 8HG	Private	WK465841
135 Land and buildings on the south side of St Paul's Road, Nuneaton		WCC	WK380085
Stockingford Junior And Infant School, Grove Road, Nuheaton (CV10 8JY -	CV10 8JH	WCC	WK42667
136 Land on the South West Side of Magyer Crescent, Nuneaton	CV11 4SQ	WCC	WK23340
32 Amebrough Mils Attleboruph Road, Nuneaton		Private	WK256088
38 Manor Park Community School: Beaumont Road, Nuneaton	CV11 55S	Private	WK430022
139 St Davids Way Hub. St Davids Way, Berttuda Park, Nuneaton	CV107SD	Povate	Wk447390
401 Halfords - land and buildings on the south aide of Newtown Road, Nuneatr *	CV11 SUT	Private	WK190614
	THE STACE	Drivente	Describe Word 24729





(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

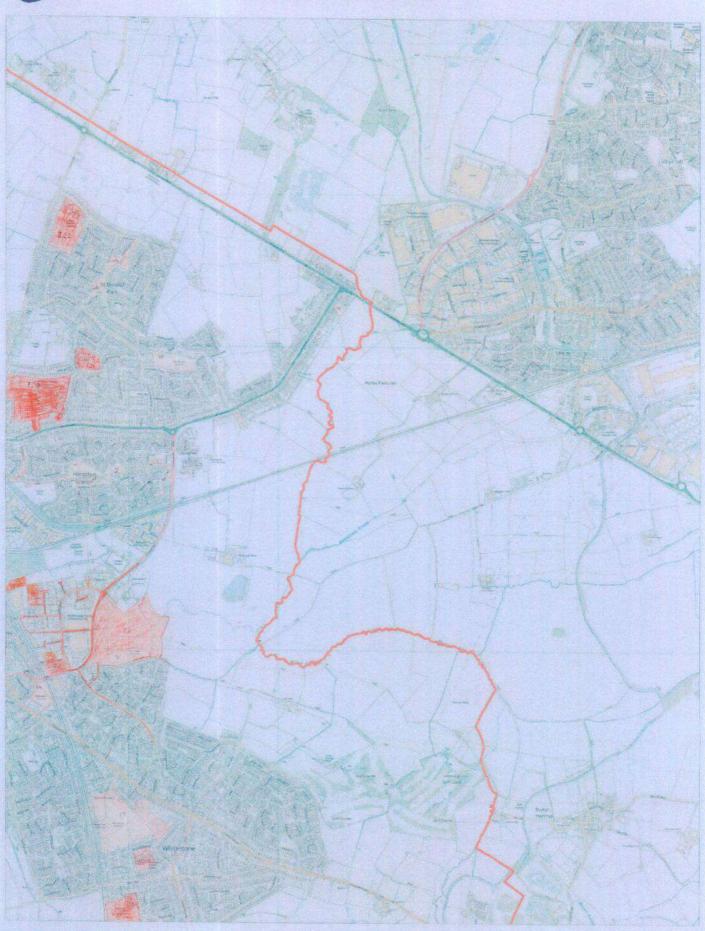
### **North of Nuneaton**



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

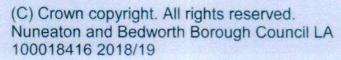


### **Northeast Nuneaton**



(C) Crown copyright. All rights reserved.
Nuneaton and Bedworth Borough Council LA
100018416 2018/19

# Southwest Bedworth



### South of Bedworth



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

# Southeast Bedworth



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

### 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 - ANAL .

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 BROUGH 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:

- 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
- 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
- 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.
- 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:

- 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.
- 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

 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 14<sup>th</sup> March 2019 "AJM1"

### IN THE HIGH COURT OF JUSTICE

QB-2019-000616

### QUEENS BENICH DIVISION

BETWEEN:

(1) NUNEATON & BEDWORTH BOROUGH COUNCIL

(2) WARCWICKSHIRE 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

<u>Defendants</u>

### 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 11<sup>th</sup> March 2019 at 11.12 hrs attend 62 De Lacy Street, Ashton-onribble, Preston, Lancashire PR2 2DD, serve the defendant Mike McDonaugh with the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> 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 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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  $4^{th}$  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

### QUEENS BENICH DIVISION

BETWEEN:

- (1) NUNEATON & BEDWORTH BOROUGH COUNCIL
  - (2) WARCWICKSHIRE 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



Nuneaton and Bedworth Borough Council Town Hall, Coton Road, Nuneaton Warwickshire CV11 5AA

> www.nuneatonandbedworth.gov.uk 024 7637 6376

Mike McDonaugh 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
- 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 pirision

Claim no.

QB-2019-000616

Fee Account no.

Help with Fees -Ref no. (If applicable)

WF.

-

Claimant

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

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

siqued to Master



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

MNO

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



Court fee

£

528.00

See attached for further details

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.

96-2019-000616

### 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 issued 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 www M. -. m

\*(Claimant)(Litigation friend) (Legal representative) position or office heldpartner

(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

APPLICATION WILL BE HEARD AT THE ROYAL COURTS OF IL SERVE, STRAND TO DOON WC2A 2LL 1913 L19
TIME TBC
IN A COURT TO BE CONFIRMED

In the High Court Queen's Bench Di	
Claim no.	QB-2019-000616
Fee Account no.	PBA0087028
Warrant no.	
Claimant (including ref.)	Nuneaton & Bedworth Borough Council and Warwickshire County Council
Defendants (including ref.)	(1) Thomas Corcoran & Ors
Date	22 February 2019

IN A COURT TO BE CONFI		Da	te	22 ebruary 2019
What is your name or, if you a	re a solicitor, the name of y	our firm?	(.	The Cap is a
Sharpe Pritchard LLP			100	2 FEB 2019 .
Are you a Claimant	Defendant	⊠ Lega	al Representat	RES BENCH DIVISION
Other (please sp	pecify)			
If you are a solicitor whom do	you represent	Claimant		
What order are you asking the	court to make and why?			
1777				e reasons set out in the witness ardson and Carol Ingleston and
Have you attached a draft of t	he order you are applying fo	or	∀es	□No
How do you want to have this	application dealt with?		at a hearing	mg without a hearing
How long do you think the heads this time estimate agreed by	<del>-</del>		at a teleph Hours Yes	Minutes
Give details of any fixed trial d	ate or period			
What level of Judge does your	hearing need?		High Court	
Who should be served with th	is application?		Defendants	8
Please give the service addres claimant or defendant) of any				

the attached witness star	tement	
the statement of case		
the evidence set out in the	ne box below	
f necessary, please continue on a separate sheet		
<ol> <li>Witness statement of Robert Watson dated 15<sup>th</sup> Feb.</li> <li>Witness statement of Martyn Stephens dated 18<sup>th</sup> Fe</li> <li>Witness statement of Katherine Ann Moreton dated</li> <li>Witness statement of Philip Richardson dated 19<sup>th</sup> Fe</li> <li>Witness statement of Carol Ingleston dated 15<sup>th</sup> Feb.</li> <li>Witness statement of Soft Andrew Sca</li> </ol>	ebruary 2019 and its 19 <sup>th</sup> February 2019 ebruary 2019 and its	exhibits. × 2 and its exhibits. exhibits.
Statement of Truth		Ganon
The applicant believes that the facts stated in this section (ar	nd any continuation	sheets) are true.
Applicant's Solicitor	Dated 22 Febr	uary 2019
Full name William Maxwell Hunt Rose		
Name of applicant's solicitor's firm Sharpe Pritchard LLP		
Position or office held <u>Partner</u> (if signing on behalf of firm or company)		
11. Claret and address details		
Signed — — — — — — Applicant's Solicitor	Dated 22 Feb	oruary 2019
Position or office held Partner (if signing on behalf of firm or company)  Applicant's address to which documents about this application	on should be sent	
Sharpe Pritchard LLP		If applicable
Elm Yard	Phone no.	020 7405 4600
	Fax no.	020 7831 1284
13-16 Elm Street		
	DX no.	353 London/Chancery Lane
13-16 Elm Street London Postcode WC1X 0BJ	DX no. Ref no.	353 London/Chancery Lane WMHR/170.19
London		

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

De	fe	n	d	a	n	ts	5

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:

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.

- 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.
- In the event that the Claimants are unable to personally serve any of the 1<sup>st</sup> to 53<sup>rd</sup> 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 workings days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the 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 CFR 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.

- The Defendants shall acknowledge survice 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 BROUGH 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:

- 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
- 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
- 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.
- 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:

- 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.
- 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

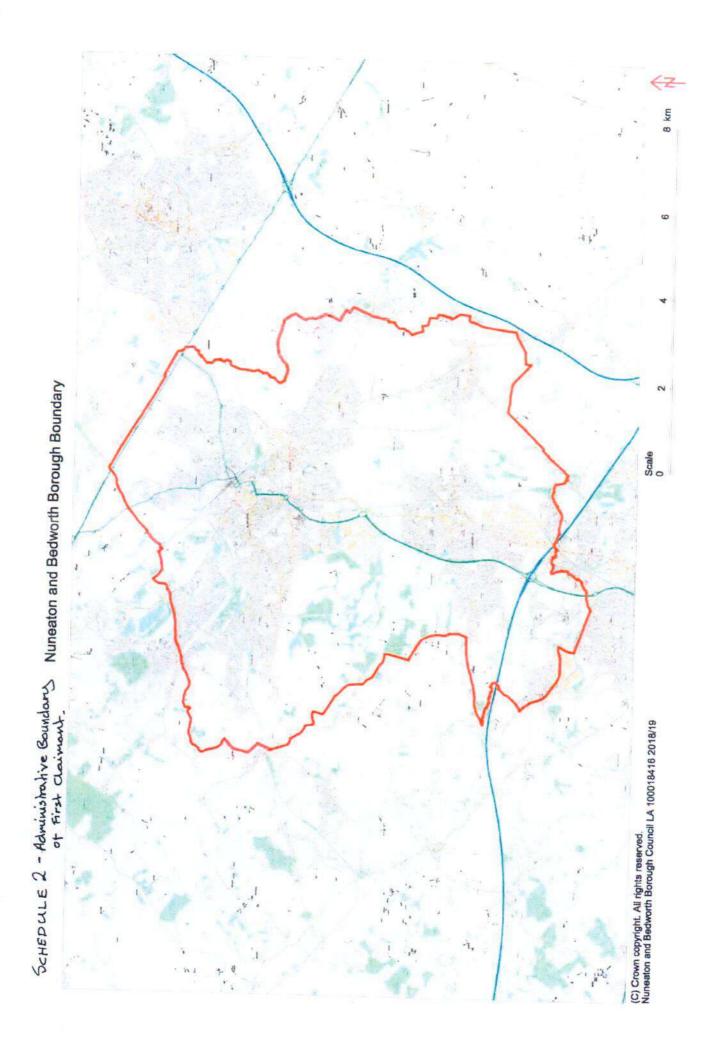
# List of Defendants and their addresses (redacted for service).

- (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

WE / X424-409B / 229314

- (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



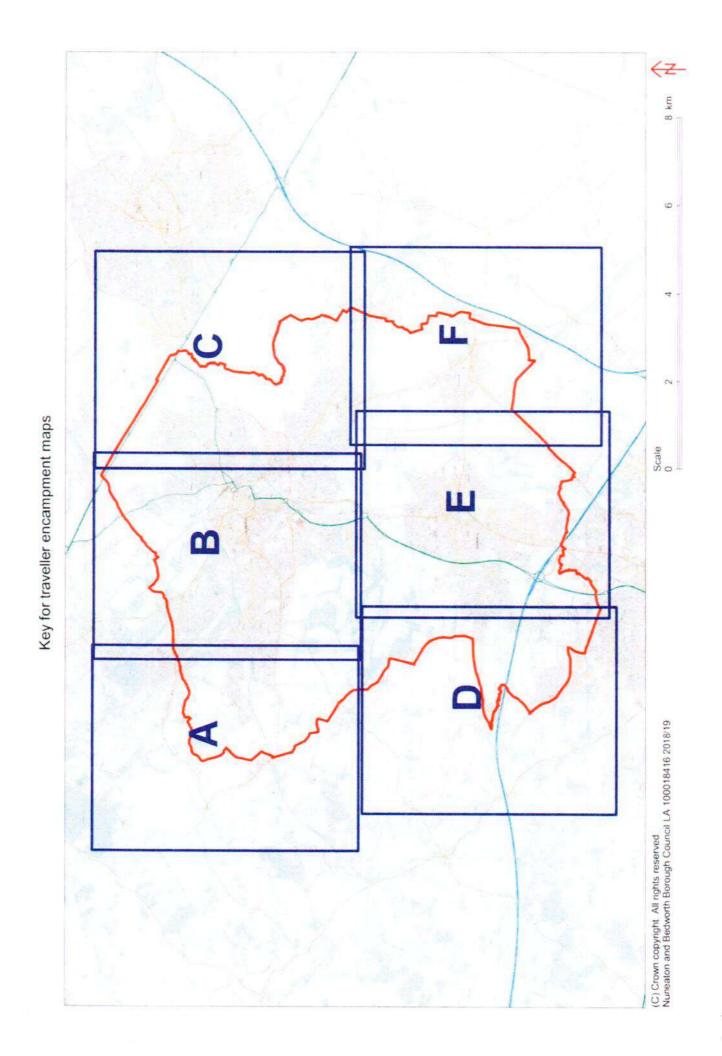
# SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

Virtuation   X	3T12,	sause g<	30001204	Land Owner	Title Wumber
SRJ   SRJ   CV11 5C   NBBC			1	NBBC	WK447699
CV11 5EP   NBBC	creation ground lying to the north of Queens Hoad, Numerion		246 LIA2	MBBC	WK446269
Street   Numeration   Numerat	strons Lane and land lying to the doubt west	×	CV11 SET	NBBC	WK447951/ WK240784/ WK236363
Street Numeration   CV11 564.)   NBBC	louth west side of Corporation Street,		CV11 5DG	NBBC	WK449599
Street Numeration   CV11 6NW Physics			CV11 50E	NBBC	WK449585/ WK178804
Street		4	CV11 48W	Dec. ade	*
Size	Ť		2000	A INDIAN	-
Street   CV11 5AE   NBBC	ton		CV11 4BS	Private	
Street	with side of		CV41 6ME		
A			2000	NBBC	WASSISTE
1.5.15    1.5.			CV11 4AS	NBBC	WK449976
1.0   1.0			CVII DAA	Negan	W. 6606A
Table in the east and west of the east	NOT:	-	COLLAND	N. DODG	AVA-CODES
The east and west of size of the south of size of a road leading and air to the south of size of a road leading and air to the south of size of a road leading to the south of size of a road leading to the south of size of size of the			200	NBBC	WAR SADE 26
side of a road keading and leading and leading and leading and leading to the south of contrast to the lead of contrast to the cont	et and word of		CALLON	14000	0100010
CV11 4PY NBBC	To see auch see to commonweath yays to the east on which compared to contribute to con			g	WK446511/ WK284250/ WK345681
As Road Numeration of CV11 2 BV NBBC out & Land lying to the CV10 EUS NBBC out & Land lying to the CV10 EUS NBBC out & Land lying to the CV10 EUS NBBC out is and lying to the CV10 EUS NBBC out of High Street of Eustan Eustace Road of Eusta Eustace Road of Eusta Eustace Road out of Eusta Eusta Eustace Road out of Eusta	NUCE COOK INCIDENCE IN THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY ADDRESS OF		20710	ADDA	-
CV10 7EL NBBC     CV10 8PV NBBC     CV12 8FV NBBC     CV10 9CV NBBC     CV10 9C	earter occurs as payore way, wiresign		CV11 &CV	Appro	-
CV10 7EL NABEC     CV10 80% NABEC     CV12 80% NABEC     CV10 90%	d yng to the north east of Braemer Way, Nuneaton, Land on the				The same of the sa
A * CV10 80S NBBC  CV10 85W NBBC  CV12 85W NBBC  CV10 90A NBBC	mess and norm east sides or Greenmour room a Labor spring to the	,	CV10 7EL	NBBC	WASSIDE VENESSUS II VENESSUS (part)
CV10 605 N890      CV12 604 N890      CV10 906 N890      CV10 906 N890      CV10 907	Slying to the east of Westbury Road and Land lying to the North of senset Numerical			NBBC	WK342561/ WK355952
CV12 6DR NBBC     CV12 9DF NBBC     CV10 9DA NBBC     CV10 9DA NBBC     CV10 9DA NBBC     CV10 9DC NBBC     CV10 9D	at Recreation Ground Tomkinson Road, Nuncation		CV10 80S	NBBC	WK447355
CV12 80F NBBC     CV12 8NF NBBC     CV12 8NF NBBC     CV12 9NF NBBC     CV12 9NF NBBC     CV10 90A NBBC	wood Road Nuneaton, land lying to the		CV10 8PV	NBBC	WK130458/ WK447033
* CV12 8NF NBBC  * CV12 8NF NBBC  * CV12 9RF NBBC  CV10 9CA NBBC  CV10 9CA NBBC  CV10 9CA NBBC  CV10 9CA NBBC  *			CV12 8DR	NBBC	WK448150
CV12 8NF NBBC     CV12 8LH NBBC     CV12 8LH NBBC     CV12 9FF NBBC     CV10 9CA NBBC     NBBC     CV10 9CA NBBC     CV10 9CA NBBC     NBBC	s on the north side of Marston Lane, Bedworth			NBBC	WK448256
CV12 6LH NBBC     CV12 9FF NBBC     CV10 9CA NBBC     CV10 9CC NBBC     NBC     NBBC	d lying to the east of High Street de of Rye Piece Ringway, Bedworth &		CV12 8NF	NBBC	WK448876/ WK246825/ WK448601
NBBC			CV128LH	NBBC	WK448511
CV12 9/F NBBC  CV10 9/D NBBC  CV1 9/D NBBC  NBBC  CV1 9/D NBBC  CV1 9/D NBBC  NBBC  NBBC  NBBC  CV1 9/D NBBC  NBC  NBBC  NBBC	Bulkington.			NBBC	WK448611/ WK448524(part)
CV10 9CA NBBC  CV7 9CA NBBC  ANBBC  ANBBC  ANBBC  CV7 9CA NBBC  ANBBC  ANBBC  ANBBC  CV7 9CA NBBC  ANBBC  ANBC  ANBBC  ANBBC  ANBBC  ANBBC  ANBBC  ANBBC  ANBBC  ANBBC  ANBBC	Eustace Road		CV12 9RF	NBBC	WK448510/ WK448500
CV10 90A NBBC  CV10 90A NBBC  CV7 96X NBBC  CV7 96X NBBC  NBBC  CV7 96X NBBC  NBBC  CV7 96X NBBC  NBBC  CV7 96X NBBC  NBBC  NBBC  CV7 96X NBBC  NBBC  NBBC  CV7 96X NBBC  NBBC			CV12 9L7	NBBC	WK449849
CV10 90b NBBC  CV10 90b NBBC  CV77 8NG NBBC  NBBC  CV77 8NG NBBC  NBBC  CV77 8NG NBBC  NBBC  NBBC  CV77 8NG NBBC		1	CV10 90A	NBBC	WK459320
DBBN ZD6 ZCA10 ACR			CV10 9DJ	NBBC	WK448197/ WK448093
NBBC  CV7 BKG  NBBC  CV7 BKG  NBBC  CV7 BKG  NBBC		,	CV10 90E	NBBC	WK373679/ WK448013
NBBN CV7 BVG NBBC CV7 BVG CV7 BVG CV7 BVG CV7 BVG NBBC CV7 BVG NBBC CV7 BVG NBBC CV7 BVG CV7 B	T			NBBC	WR447731
CV7 9457 NBBC  CV7 9452 NBBC  CV7 9452 NBBC  * CV7 9452 NBBC  * NBBC  * NBBC  * NBBC  * NBBC  * NBBC	d on the West side of Blackberry Lane. Bedworth	,		NBBC	WK137139
CV7 8NG NBBC	onal Ground - land lying to the north of School Lane.	8	x30 LAJ	NRBC	WHC450050
NBBC CV/96Z NBBC	North East of Howar Road, Bedworth		CV7 8NG	NBBC	WK124031
CV7 9GZ NBBC				NBBC	WK336223
CREA			500 600	NABIC	WK143991/WK154857
TOTAL CALL	2009		CVIDATO	COUNT	

Annual for the west of the wes	Common (CV10 9NJ) I land at Campbell Close: Nuneaton and land at to Galley Common, Nuneaton (CV10 9NJ)	CV10 992	NBBC	WK.447381/ WK.439120/ WK.244038/ WK.238145
E. Whiteleford	e south west side of Selby Way, land on the north side of Drive and land on the north east side of Merins Avenue, south of Freesland Rise. Whittleford and land lying to the West of		NBBC	WK319146/ WK32656
Land on Callery Continent, Nationation, strong as Castley Comment National and Land on Callery Comment, Nationation, strong and Callery Comment, Nationation, strong as Callery Comment, Nationation, strong as Callery Comment, Nationation and Carlo and Property and Carlo and Ca	he east and west side of Sherbourne Avenue, Whatteford	i	NBBC	
Farm, Smorral	Land on Galley Common, Numeaton, land at Galley Common Numeaton and Land on the south side of Plough Hill Road Stockingford		NBBC	WK238447/ WK238145/ WK324522
Farm, Sinorrall	and on the south side of Sherbourne Avenue, Nurseaton		NBBC	WK234444
Fam., Smornall			MBBC	WK281821
197   194   198	Farm, Smorrall		Private	-
In   Place			NBBC	+
Int   Road.			NBBC	WK32497
and Numeration and land on the act of Backworth and and band on the act of Backworth and land ying to the west of the west of the season and land ying to the west of the backworth and an analy Minera Werlane Park, Rye Piece   any - Minera Werlane Park, Rye Road, American   and - Mineration and Land on the west and  any - Mineration and Land on the west and  any - Mineration and Land on the west and  any - Mineration and Land on the west and  any - Mineration and Land on the west and  any - Mineration and Land on the west and  any - Mineration and Land on the Werlane   any - Mineration and Land Werlane Mineration and Land on the Werlane  and - Mineration and Land on the Werlane  and Marketon Lane Mineration and Land on the  any - Mineration and Land Werlane Mineration and Land on the Werlane  and - Mineration and Land on the Werlane  and - Mineration and Land on the Werla	iley Road.		NBBC	WK32497
Thereis Welfare Park, Rye Piece Ringway,  All Statistics Welfare Park, Rye Piece Ringway,  All Animons Welfare Park, Rye Piece Ringway,  All Animons Welfare Park, Rye Piece  Animons Welfare Park, Rye Chile Park, Rye C	Land on the west side of Westbury Road. Numeaton and land on the north-east side of Grove Road, Numeaton and land lying to the west of Muneston Road.		NBBC	WK448137/WK448304/WK317827
And the sound and and and and and and and and and a	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway,			WK449032
Annual and land on the South sale of control to the South sale of the sale	Land lying to the West side of Blackhorse Road, Bedworth			4
and J. Miners Welfare Park, Rye Piece  and J. Mines Welfare Wel	Land on the North side of Bulkington Road and land on the South side of Johnson Roadkies Wisson Centre, 34 Nurveaton Road, Bedworth (CV12, 8AL), and land tying to the west of Wootfon Street and land at Bizabeth.		-	WK169700! WK448169! WK250992! WK448429
an Park) - Miners Welfare Park, Rye Piece   an J. Miners Welfare Park, Rye Piece   are park) - Land on the north side of  are park) - Land on the north side of  are land on the north side of  are land are side of land on the north side of  are land are side of land are land are land are land are land are land are land on the west  a sides of Membrane Road, Numeration   are land to the west of Numeration Road  are land to the west and  and land tying south and west of  are land to the west and  and land to the west and  are land are land on the west and  are land to the west and  are land to the west and  are land to the wast of the land on the   Numeration and land on the west and  are land on the wast of  Anneaton and land and land are  are size of Markston Land Numeration and land at  an All arison Land Numeration and land on  an All arison Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Numeration and land on  are size of Markston Land Num	Centre, Johnson Road Miners Welfare Park, (Car Park) - Miners Welfare Park, Rye Piece		ADD ADD	-
Any - Minera Welfare Park, Rye Piece   as Park) - Land on the north side of   worth   NBBC  Social acquest Road Collycirof, Bedworth and   NBBC  Anadykee Wilson Centre at Numeration   NBBC  CV12 6,0   NBBC  CV11 6,1   NBBC  CV1	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Prece		2	_
As Death, Land on the north side of As CV12 8.15 NBBC NBBC Stages Road Collycroft Bedworth and As Stages Road Standards Road Numeration Road Standards Road Numeration and land to the west and land on the landards lan	Ringway, Bedworth Misses Welfare Dark Car Dack - Miners Welfare Dark Rive Diece		NBBC	-
Head on the north side of head head head head head head head head	Miners wetters hark (Let hark) - without swending harm, hyd hebe. Ringway Bedworth		NBBC	_
Negatives Road Collycroff Bedworth and so Jacques Road Collycroff Bedworth and sets of Numeration Road Numeration New Statements Avenue Road Numeration New Statements Avenue Numeration and land to the west and so of the Numeration and land to the west as sets of Numeration and land on the west and so of Numeration and land on the west and so of Numeration and land on the west and so of Numeration and land on the west and so of Numeration and land on the west and so of Numeration and land on the Numeration and land on the Numeration and land at Numeration and land at Numeration and land at Numeration and land at Numeration and land and on CV11 4RE NUMBER OF Numeration and land on Numeration and land on Numeration and land on Numeration and land on Numeration and Numeration and land on Numeration and Numeration and land on Numeration and Numer	Bedworth Railway Station (Car Park) - Land on the north side of Distriction Board Seminary		NBBC	
Activates Road Collycust Bedworth and the west of Nurreation Road & Nurreation and land to the west and and on the west and	Land at Arbury Avenue. Bedworth		NBBC	
sides of Newtown Road, Numeration  ** CV12 DA, NBBC  University Road, Numeration and land to the west of angles of Newtown Road, Numeration and land to the west and and to the west and and land to the west and and land to the west and and land on the west and angles of Nameron and land on the west and angles of Nameron and Land on the west and angles of Nameron and Land on the country Lane. Nowteston and Land on the country Road. Nameron and Land Road. Nameron La	Land lying to the east of Amos Jacques Road Collycroft, Bedworth and land to the west of Numeralan Read-Kake Wilson Centre 34 Numeraton Board Indexects and land to the west of Numeraton Road		NBBC	WK295888I WK460024/ WK448169/ WK317827
Interest Avenue, Numeration and land for the west of Avenue, Numeration and land lying south and west of Avenue, Numeration and land to the west and sand to the west and sand to the west and sand to the west and and on the west and avenue, Numeration and Land on the vest and avenue, Numeration and Land on the Avenue, Numeration and Land on the Avenue, Numeration and Land on the Avenue, Numeration and land at Avenue, Numeration and land and Avenue, Numeration and land and Avenue, Numeration and land on Avenue, Numeration a	Land on the north and south sides of Newtown Road, Nuneation		NBBC	-
Intreation and land lying south and west of x  TOWARD Numeration and land to the west of Shoot Numeration and land to the west of Shoot Numeration and land to the west and dialed to the west and control of thinking Road  Towards Road Numeration and Land on the control of the Name Covin C	Land lying to the north of Butternere Avenue, Nuneaton		NBBC	
rickiey Road, Nureation and land to the west   CV116Y, Road, Nureation and land to the west and angletic between the south of Hinckiey Road, CV116Y, RABC  Gland to the south of Hinckiey Road, CV116Y, RABC  NABC  CV116Y, RABC  CV116Y, RABC  CV116Y, RABC  CV116Y, RABC  CV116Y, RABC  NABC  CV116Y, RABC  CV116Y, RABC  NABC  CV116Y, RABC  CV116Y, RABC  NABC  CV116Y, RABC  NABC  CV116Y, RABC  CV116Y, RABC  NABC  CV116Y, RABC  NABC  CV116Y, RABC  NABC  CV116Y, RABC  NABC  CV116Y, RABC  CV116Y,	luneaton and land lying south and west of		NBBC	-
Trie Long Shoot Nureation (CV11 E.H)   x   CV11 E.H NBBC of Grange and land to the south of Hickley Road,   x   CV11 EV1 NBBC of Grange and land to the west and   x   CV11 EV1 NBBC of Changebrook Close and land on the west and   x   CV10 EV1 NBBC of Every Name and Land on the extension   x   NBBC of CV10 EV1 NBBC of Every Name and Name and Land of the extension   x   NBBC of CV10 EV1 EV1 NBBC of CV10 EV1	rickley Road, Nuneaton and land to the west		NBBC	-
Nemester in Criange and land to the south of Hinckley Road.  Nemester in Control of Changebrook Close and land on the west and  Land on the east side of Changebrook Close and land on the west and  Land on the south side of Changebrook Close and land on the west and  Land on the south side of Shookdale Road Numeston  Land on the south side of Brookdale Road Numeston  Land on the south side of Changebrook Road Numeston  Land on the noth side of Changebrook Road Numeston  NBBC  Land on the south side of Avenue Road Numeston  An expensive Road Numeston  Land on the noth side of Avenue Road Numeston and land at  An expensive Road Numeston  Land on the noth side of Avenue Road Numeston and land at  NBBC  Land on the noth side of Nationary Road. Numeston and land on  Land on the noth side of Nationary Road. Numeston and land on  Land on the noth side of Road Shareston Lane Numeston and  Land on the noth Road Shareston Lane Numeston and land on  CV11 4RE  CV11 4RE  NBBC  CV10 6W  NBBC  CV11 4RE  NBBC  CV11 4RE  NBBC  CV11 4RE  NBBC  CV10 6W  NBBC  CV10 6W  NBBC  CV11 4RE  NBBC  CV10 6W  NBBC  CV10 6W  NBBC  CV10 6W  NBBC  CV11 4RE  NBBC  CV10 6W  NBBC  CV11 6W  NBBC  CV10	18	CV11 6.3H	NBBC	
Australia of the east act of Changeptrook Close and land on the west and a said on the east act of Changeptrook Close and land on the west and a said on the said of the latest Drive Numeration  Australia of the south side of Broadlaie Road Numeration and Land on the CV10 0BM NBBC  And on the south side of Broadlaie Road Numeration  * CV10 0BM NBBC  Land on the north side of Avenue Road Numeration  * NBBC  Land on the north side of Chanterione Avenue Numeration  * NBBC  Land on the north side of Chanterione Avenue Numeration  * NBBC  Land on the north side of Avenue Road Numeration  * NBBC  Land on the south side of Avenue Road Numeration  * NBBC  Land on the south side of Avenue Numeration and land at Land on the east of Raveiore Nameration  * NBBC  Land on the east south of Side of Dentition and Numeration and Land on the east of Raveiore Control of Nameration and Land on the east and west sides of Mariston Lane Numeration and Land on the east and west sides of Nameration and Land on the east of Seconds Visit American and Land on the east of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side Office Seconds Visit American and Land on the Side of Seconds Visit American and Land on the Side Office Seconds Visit American and Land on the Side Office Seconds Visit American American American American American American American Ameri	Land at Horseton Grange and land to the south of Hinckley Road, 55 Nuneaton	CV116YL	NBBC	WK336798/ WK447654
Land on the south side of Church Lane, Nuneation and Land on the worth side of Brownstale Road Nuneation and Land on the CV10 GBV Nusber Nusber Nusber CV10 GBV Nusber Nusber CV10 GBV Nusber Nusber Nusber CV10 GBV Nusber Nusb			NBBC	-
Number of the north side of Broandale Road. Numeration and Land on the   ** CV10 GBM NIBBC  ** CV10 GBM NIBBC  ** CV11 GBC  ** CV11 GBC  ** CV11 GBC  CV11 GBC  CV11 GBC  CV11 GBC  CV10 GBM  ** NIBBC  ** NIB		CV10 0HG	Н	+
Land at Bradestone Road. Nureation  * NBBC  Land on the north side of Chorninome Avenue. Nureation  * NBBC  Land on the north side of Chorninome Avenue. Nureation  * NBBC  Land on the north side of Avenue Road. Nureation  * NBBC  Land on the north side of Avenue Road. Nureation  * NBBC  Land on the north side of Unitation.  * NBBC  Land on the north side of Marticough Road. Nureation  * NBBC  Land on the north side of Nariborough Road. Nureation  * CV11.6PD  NBBC  Land on the east and west sides of Marticough Road. Nureation and  Land on the east and west sides of Marticough Lane. Nureation and  Land on the east and west sides of Marticough Lane. Nureation and  Land on the east and west sides of Marticough Lane. Nureation and land on  CV10.7BX  NBBC  CV10.7BX  NBBC		CV10 DBN	NBBC	_
Land on the north side of Conditions Avenue, Nuneation   x   x   x   x   x   x   x   x   x	kg Land at Bradestone Road. Nuneaton		NBBC	WK450499
Land on the south side of Average Road. Nurseation.  Land on the south side of Average Road. Nurseation and land at Land on the north side of Average Road. Nurseation and land at Land on the north side of Charitorian Average. Nurseation and land at Land on the south-ward side of Maritorian Road. Nurseation  Land on the south-ward side of Maritorian Road. Nurseation and Land on the east of Raveloe Chine Nurseation and Average Charitorian Average Road. Nurseation and Land on the east sides of Maritorian Lane. Nurseation and Land on the east and west sides of Maritorian Lane. Nurseation and Land on the east and west sides of Maritorian and Land on the sides and west sides of Maritorian Lane. Nurseation and Land on the sides and west sides of Maritorian and Land on the sides of Maritorian Lane. Nurseation and Land on the sides of Maritorian Lane. Nurseation and Land on the sides of Secondar Maritorian Land Only Nurseation and Land on the sides of Secondar Maritorian Land Only Land Land Only Land Land Only Land Land Land Land Land Land Land Land			NBBC	
And on the routh side of Avenue Road Nurreation and land at   *** Avenue Road Nurreation Road Nurreation and land at   *** CV11 5PO NBBC.  Land on the south-west side of Maritorizugh Read, Nurreation and land at   *** CV11 5PO NBBC.  Land on the east and west and of Maritorizugh Road Nurreation and   Land on the east and west and sides of Maritorizugh. Narw, Nurreation and   Land on the east and west and SC Georges Way, Nurreation and land on   CV10 7BX NBBC.	71 Land on the south side of Avenue Road, Nurseaton		NBBC	WK452236
Knebley Crescent, Numeaton  Land on the south-west side of Mariborough Road, Numeaton  × CV11 5PO NBBC  Land on the south-west side of Mariborough Road, Numeaton and Chorulo Name Annume Annume Numeaton and Panel Numeaton and Chorulo Numeaton, inno or the nest side of Mariborous Name Numeaton and Land on the east and west all reads of Mariborous Land Numeaton and Land on the east and west all reads of Mariborous Land Numeaton and land on his Annumental Court Name Numeaton and Land On Annumental Research Sections Name Numeaton and Land On Annumental Research Sections Name Numeaton and Land On Annumental Research Section Name Numeaton and Land On Annumental Research Sections Name Numerous Name Numer			VBBK	WK448)855
Land on the south-west side of Mariborough Road, Nurneation × CV11 5PO NBBC Land at Donnithorne Avenue. Nurneation: land sying to the east of Ravelore Drive. Nurneation, land on the east side of Mariston Lane. Nurneation and Land on the east and west sides of Mariston Lane. Nurneation and Land out the east and west sides of Mariston Lane. Nurneation and Land bying on the routh side of Si Georgee Way. Nurneation and land on CV10 7BX NBBC. The Auth side of Si Georgee Way. Children Control.				_
Land at Donnithorne Avenue. Nuneation, land sying to the east of Ravelove.  Drive, Nuneation, land on the east side of Marston Lane. Nuneation and Land on the east and west sides of Marston Lane. Nuneation and Land on the east and west sides of Marston Lane. Nuneation and land on  CV11 4RE NBBC.  The Auch scale of St Geometry Mary, Nuneation and land on  CV10 7BX NBBC.	74 Land on the south-west side of Marlborough Road, Nuneaton	CV11 5PQ		-
Land lying on the north side of St Georges Way, Nuneation and land on CV10 78X NBBC.	and that and	CV114RE	NBBC	-
	Land lying on the north side of St Georges Way, Nuneaton and land on an the horth side of St Georges Way. Chilwers Coton.	CV10 78X	NABC	to registed to

Trienty Count Forth Reside and Education Wash Numeration  Trienty Count Fast Care Plants, I and on the West side of Highlight Road.  Trienty Count Fast Care Plants, I and on the West side of Highlight Road.  Trienty Count Fast Care Plants, I and on the West side of Highlight Road.  Trienty Count Fast Care Plants, I and on the West side of Highlight Road.  Trienty County Education Consequent Road Road Road Road Road Road Road Road	79 Bluesetter Dark (Car State) Bluesetter Dark Cotton Board Management	× CV116TX	X NRBC	_
Triny Count of the sease of Estation Way, Naviestion  Triny Count (San Care Plank), and on the West size of Hopfield Road,  Triny Count (San Care Plank), and on the West size of Hopfield Road,  Associated Road (San Care Plank), and on the West size of Hopfield Road,  Associated Road (San Care Plank), and on the West size of Hopfield Road,  Associated Road (San Care Plank), and on the West size of Hopfield Road,  Associated Road (San Care Plank), and on the West size of Hopfield Road,  Associated Road (San Care Plank), and on the West Size of Back (Care Plank)  Associated Road (San Care Plank), and on the West Size of Back (San Care Plank)  Associated Road (San Care Plank), and on the West Size of Back (San Care Plank)  Associated Road (San Care Plank), and on the West Size of Back (San Care Plank)  Associated Road (San Care Plank), and on the West Size of Back (San Care Plank)  Associated Road (San Care Plank), and Care Plank)  Associated Road (San Care Plank), and Care Plank)  Associated Road (San Care Plank)	the part on the north side of faceture Done Management	71170	t	_
Municipal Count Pass (Carl Pask) - land on the West side of Hopfeld Floak   Number Count Pass (Carl Pask) - land on the West side of Hopfeld Floak   Number Count Pass (Carl Pask) - land on the West side of Hopfeld Floak   Number Count Pass (Carl Pask) - Number Count Pask) - Number Count Pass (Carl Pask) - Number Count Pask) - Number Count Pask (Carl Pask) - Number Count Pask (Car	Land lying to the east of Eastboro Way, Nurreaton	CVITED	+	1
Named to the control between the control betwe	Tronty Court Flats (Car Park) - land on the West side of Highfield Road			
June 2   Private   Priva	Nureaton			WK310067
NBCC	Land at Acacia Crescent, Bedworth		NBBC	-
WCC	Land at Dunns Close, Nuneaton		NBBC	-
WCC	Land lying to the West of Blackhorse Road, Bedworth	*	Private	-
CV12 86A     CV12 84B     WCC     CV12 9FP     WCC     CV10 9CH     WCC     WCC     CV10 9CH     WCC	Atteborough Fields Farm, Numeaton and Land at Slingsby Close. Atteborough Fields Industrial Estate, Numeaton		WCC	WK271545/ WK455358
CV12 BAH   Private	Necholas Chamberlaine School: Bulkington Road, Bedworth (CV12 9EA)	CV12 96		SALES OF THE PARTY
V   CV12 BAD   Pinvate     V   CV12 BAD   WCC     V   V   V   V   V   V     V   V   V			t	White Colors / White Colors
CV12 BAD WCC	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH)	CV7 9A		-
CV12 94P WCC   CV12 94P WCC   CV12 94P WCC   CV12 94P Private   CV12	Race Leys Infant School, Bedworth	N. CV52.BA	Н	Unregistered
X	Goodyers End County First School, Bowling Green Lane, Bedworth,		-	
X	CV12 0HP)		+	WK424335
CVT 95.1 WCC	All Saints Bedworth C of E Primary School and Nursery, Bedworth	* CV12 St	+	Unregistered
CV7 95.8   Phivate	and on the West side of Weston Lane, Bulkington, Bedworth	× CV12 94	1	
CV7 842 WCC	and and buildings on the South side of Derwent Road, Bedworth	CV128F	+	
CV7 948 WCC     CV7 949 WCC     CV7 949 Physite     CV10 954 Physite     CV10 954 Physite     CV10 954 Physite     CV10 954 WCC     CV10 954 WCC     CV10 954 WCC     CV10 956 WCC     CV10 957 WCC     CV10 956 WCC     CV10	and lying to the East of Coveratry Road, Bedworth	*	1	WK3 KCB2
CV12 0HA   WCC	Keresley Newland Primary Academy and Keresley Newland School.			UNSERTER TO COME \$77303
CV12 GHS   WCC	and been forth Court of Sanaral Lane Goodnesse Fort Radworth and		t	
WCC	and lying to the South of smortal Lane Bedworth	CV12 OF		WR276047WR134659
No.   CV12 BJN   Pinvate	Aheelvinght Lane Primary School, Ash Green, Coventry	CV7 9H		WK425267
Physics	St Francis Roman Catholic School Nicholas Street Bedworth	x CV12 8J	t	WK262596
WCC	and Mind to the North of Rive Piece Ringway Bedworth		T	WK476476
CVT 9PK   Private	and on the East Side of Nicholas Street Bedworth		WCC	
CV12 9PF   Physike	and on the South Side of Hayes Lane, Exhall Bedworth	CV7 9N		WX171647
Private   Private	St James Church of England School, Barbridge Road, Bulkington,	de civio		
Physics	Sedworth (CV12 9PF)	1		
CV10 7EX   Private	Playing fields at St. James Church of England Junior School, Barbridge		Decision	
CV10 7EX   Physide	Aged Burkington, Dedworth, LV L Brit	Course of the Co	Ť	-
CV10 7EX   Phryste	St Michael & Primary School, Hazel Grove, Bedworn, ICV12 Novy	UV 16 TU	t	-
Principle	Land adjoining St. Fromas More School, Greenshoor Hoad, Numerion, CV10 7EX.	CV107E		
CV11 5ER   Private	SI Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10		Danish	
X			Drivate	
CV10 BNH   Physite	ADDY THE SOUND WESTINGS TOWN (AUTHOR)	28 19750	Ť	-
CV10 3AT   Private	ADDRY COT F. IMARI SCHOOL, NOTRESON All Caleta C. of E. Donners, Colocot & Number - Knahlau Chargest Nichtarton	200	t	200000000000000000000000000000000000000
Camp Hill Numeration	CV10 7AT)	CV10 7A		
Vicane, Numeration         V.C.         CV11 4SE         WCC           and Stoest, Numeration (CV11 5RB)         *         CV11 0PH         WCC           Numeration (CV11 5RB)         *         CV11 0PH         WCC           Numeration         *         CV10 BER         WCC           Close, Numeration         *         CV10 BER         WCC           Close, Numeration         *         CV10 BER         WCC           School, Grove Road, Numeration         *         CV10 TuW         WCC           School, School, Branch (CV10 BLU) and sand         *         CV10 BM         Physics           School, Bentley Road, Numeration         *         CV10 BM         Physics           Valvestron         *         CV10 BM         Physics           Numeration         *         CV10 DLX         Physics           CV10 DLX         CV10 DLX         Ph	Land to the South of Tuttle Hill, Camp Hill, Nuneaton	CV10 90		
Murreation	and lying to the South of Gipsy Lane, Nuneaton	CV11 4S		WK170501
Street, Numeration (CV11 5RB)   VCC   VCV10 5RB   VCC   VCV10 5RB   VCC   VC	and at Judkins Quary Tuttle Hill, Nuneaton	CV10 G		WK393091
Numeration	Chilvers Coton First School, Frank Street, Nuneaton (CV11 SRB)	CV115R		WK424955
Numeration   Num	and hing to the west of Northumberland Avenue. Nuneaton	CV10 BE	-	WK239413
Cologe Numeration   X		CV10 9N	-	Unregistered
Close Numeration   *   CV10 TuW   WCC	and king to the East of Higham Lane, Nuneaton	CV1162	H	WK205172
School, Grove Road, Nuneation (CV10   x   CV10 PBO   WCC     School, Grove Road, Nuneation (CV10   x   CV11 STY   WCC     WCC   WCC   WCC   WCC   WCC   WCC     WCC   WCC   WCC   WCC   WCC   WCC   WCC   WCC     WCC	and on the south side of Sxye Close, Numerian	× CV10 72		WK178493
School, Grove Road, Nuneation (CV10 * CV10 8HW WCC  **COV10 8HW WCC  **WCC  **W	Middlemarch School, Nuneaton	CV10 78	-	Unregistered
and buildings on the south side of St Paur's Road, Nuneation  and buildings on the south side of St Paur's Road, Nuneation  and of the Angels Infant School and St Josephs RC First School.  A Road Nuneation, CV115TY Private  To Road Nuneation, CV115TY Private  To the North School Park Lane, Nuneation (CV10 &LU) and land  on the North School Park Lane, Nuneation  on the North School School, Bentley Road, Nuneation  on the North School School, School, School School Nuneation  at School Road School, School Camp Hill Drive Nuneation  x School School School Camp Hill Drive Nuneation  on the North School School Camp Hill Drive Nuneation  y School School School School Camp Hill Drive Nuneation  CV10 CUX  Private	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10	To Christian		
WCC	UV)	2		WK426673
CV10 BNE Private     CV10 BNE Private     CV10 BNE Private     CV10 BNH Private     CV10 BNH Private     CV10 BNH Private     CV10 BNH Private	and and buildings on the south side of St Paul's Road, Nuneaton		1	
CV10 8N6 Private  Private  CV10 8N4 Private  * CV10 UNH Private  * CV10 UNH Private  * CV10 UNH Private	School at Coton Road, Nuneaton	x CV115T	1	
CV10 8NE Private  Private  CV10 SNH  CV10 SNH  Private  Private  CV10 CV10 SNH  Private	Our Lady of the Angels Infant School and St Josephs RC First School,		Drivate	
COVID BNN: Private     COVID BNN: Privat	Copy Road Nutrelson, CV 11 011		t	-
COVIDERM     COVIDERM Provide     COVIDERM Provide     COVIDERM Provide     COVIDERM Provide     COVIDERM Provide	Park Little Printially surrors, many Laste, municipality to succeed and control hade of Ansley Road, Nuneation	CV10 8N		
	and on the North Side of Ansley Road, Nuneaton	0	Private	
CV10 GUH   Provide	Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11			
v CV10.0.0 Private			1	
HON TOUR	St Pauls C of E Primary School, Nurseaton	SALA	T	LINGSTANCE
* CVITAGN	and at St Anne's RC Primary School, Camp Hill Drive, Nuneation	CAID	+	WesterCooking
HO21170	St. Anne s Komen Casholic Primary School, Camp Hill Little, Numerion, CV10 OJX		Private	WK46995.3
	Colombia Debate Colombia Colombia Colombia Colombia	000000	t	

18	Clairwood Primary School, Moms Drive, Nuneaton, CV11 4QH		WCC	WK233776
1 40	Playing field adjoining St Nucholas C of E Primary School, Windemere x 121 Average Branch Numeration CV11 6HJ	CV11 6HJ	wcc	WK473130
20	Land on the East Side of Windermere Avenue, Nuneaton		Private	WK131856
1.0	St Nicolas C of E First School, Windermere Avenue, Nuneation, CV11 64U		Private	W8473119
104	122 Land Wing to the North East of Cakdene Crescent, Nuneation	CV10 0DR	WCC	WK149023/WK716447
100	123 Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP	CV11 40P	Private	WX458966
5 49	124 Land on the North Side of Avenue Road, Nuneaton	CV11 4[U	NBBC	WK448965
140	125 Etone College Leicester Road, Nuneaton, CV11 5AA	CV11 BAA	WCC	WKA25515
100	26 Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	CV10 08J	Private	WK465313
127	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4	CV11 40H	WCC	WK468047/WK468048/WK233776
19365	128 Land Wing on the South of Arbury Road, Nuneaton and Nuneaton Academ	CV10 7PD	WCC	WK175243/WK425489
50	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CO11 68H	CV11 68H	Private	WK428695
110	130 King Edward VI College, King Edward Road, Nuneaton, CV11 48E	CV11 4BE	Private	WK697842/WK297832
E 400	131 Bedworth Health Nursery School, Glebe Avenue, Bedworth, CV12 9DP *	CV12.0DP	WCC	WK426282
TEN	132 Exhall Grange School and Science College, Wheelwright Lane, Bedworth		WCC	Wk426590
	Exnall Grange Special School, Wheelwright Lane, Coventry		Private	WK440475
100	Land at Exhall Grange School, Wheelvinght Lane, Coventry, CV7 9HP	CV7 9HP	Private	
142	33 North Side of Griff Lane, Nuneation	CV10 7SD	WCC	WK365844
15.75	34 Land Wing to the West of Lecester Road, Nuneaton	CV12 BAG	WCC	WK240628
200	Race Leys Middle School, Barton Road, Bedworth, CV12 8HG	CV12 8HG	Private	WK465841
150	35 Land and buildings on the south side of St Paul's Road, Nuneaton		WCC	WK380085
200	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY /	CV10 8JH	WCC	W842662
1140	136 Land on the South West Side of Magyer Crescent, Nuneation	CV11 45Q	WCC	WK23140
150	137 Ametrough Mils, Attleborugh Road, Nuneaton		Private	WK256088
190	38 Mancr Park Community School, Beaumont Road, Nuneaton	CV11 5SS	Private	WK430022
12 400	139 St Davids Way Hub. St Davids Way, Bermuda Park, Nuneston	CV10 7SD	Phyvate	w6447390
1150	140 Halfords - land and buildings on the south side of Newtown Road, Numeate *	CV115UT	Private	Private Wx390614
11		THE USE	Private	WK474729



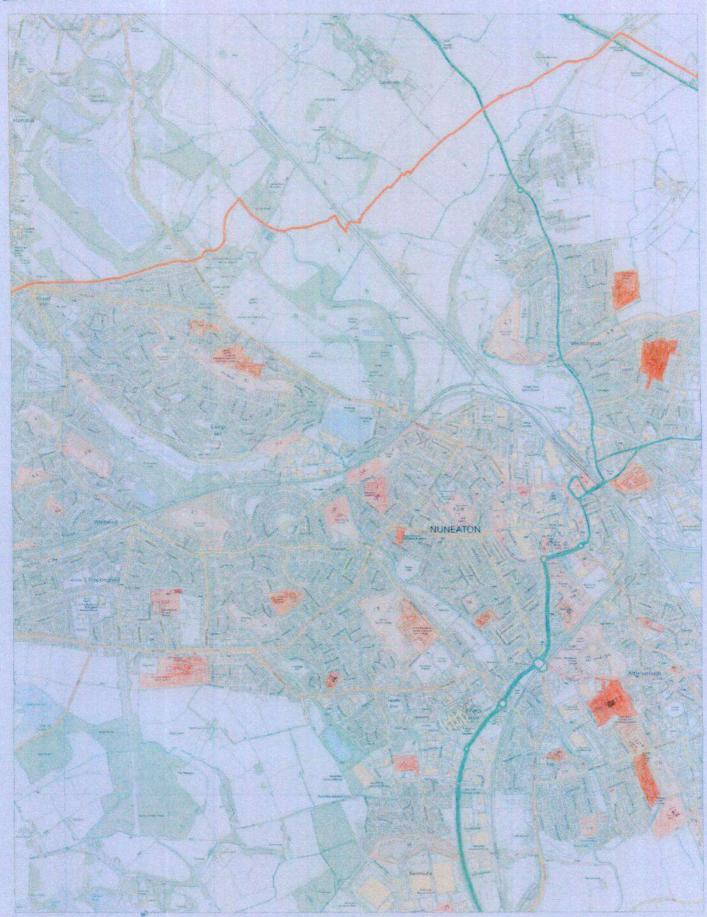


## **Northwest Nuneaton**



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

### **North of Nuneaton**



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

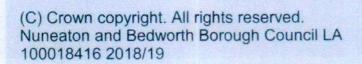


### **Northeast Nuneaton**



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

# Southwest Bedworth



### South of Bedworth



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

### Southeast Bedworth



(C) Crown copyright. All rights reserved.
Nuneaton and Bedworth Borough Council LA
100018416 2018/19

#### 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 - ANAL .

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 BROUGH 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:

- 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
- 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
- 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.
- 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:

- 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.
- 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

 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 14<sup>th</sup> March 2019 "PT1"

#### 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** 

#### 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 11<sup>th</sup> March 2019 at 11.25 hrs attend at 1 Gapton Hall Road, Great Yarmouth, Norfolk NR31 ONL, 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 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> 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 ONL.
- 2. THAT I did Monday 11<sup>th</sup> 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 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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  $4^{th}$  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 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> 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

#### QUEENS BENICH DIVISION

BETWEEN:

- (1) NUNEATON & BEDWORTH BOROUGH COUNCIL
  - (2) WARCWICKSHIRE 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



#### Nuneaton and Bedworth Borough Council Town Hall, Coton Road, Nuneaton Warwickshire CV11 5AA

www.nuneatonandbedworth.gov.uk 024 7637 6376

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
- 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



Nuneaton and Bedworth Borough Council Town Hall, Coton Road, Nuneaton Warwickshire CV11 5AA

> www.nuneatonandbedworth.gov.uk 024 7637 6376

Michael Ward Splashes Castle Acre Road Swaffham Norfolk **PE37 7XE** 

Email:legal@nuneatonandbedworth.gov.uk

Date: 4 March 2019

Dear Sir/Madam

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 pivision

Claim no.

QB-2019-000616

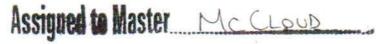
OURT

Fee Account no.

Help with Fees -Ref no. (if applicable) HWF-

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

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



Defendant(s)

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

(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

YNO

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



Court fee

528.00

See attached for further details

Legal representative's costs

TBA

Issue date

22 February 2019

f

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.

96-2019-000616

#### 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 issued 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

*I am duly authorised by the claimant to sig	facts stated in these particulars of claim are true.  gn this statement.
Full name William Maxwell Hunt Rose	
Name of claimant's legal representative's firm	m Sharpe Pritchard LLP
signed win M m	position or office heldpartner
*(Claimant)( <del>Litigation friend</del> ) (Legal representative)	(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

Queen's Bench Di	VISIOII
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 ED (Hary 2019

TIME TBC	(including ref.)	
IN A COURT TO BE CONFIRMED	Date 22 ebruary 2019	
What is your name or, if you are a solicitor, the name of	220 11	
Sharpe Pritchard LLP	E 1 FEB 2019 .	
Are you a Claimant Defendant	Legal Representative BENCH DIN SOT	
Other (please specify)		
If you are a solicitor whom do you represent	Claimant	
What order are you asking the court to make and why?		
The Claimant seeks an injunction in the terms of the distatements of Robert Watson, Martyn Stephens, Kather their exhibits.		
Have you attached a draft of the order you are applying	for 🛛 Yes 🔲 No	
How do you want to have this application dealt with?	at a hearing without a hea	aring
How long do you think the hearing will last?  Is this time estimate agreed by all parties?	at a telephone hearing  Hours  Minutes  Yes	
Give details of any fixed trial date or period	-	
What level of Judge does your hearing need?	High Court	
Who should be served with this application?	Defendants	
. Please give the service address, (other than details of the claimant or defendant) of any party named in question		

the attached witness stat	ament	
	ement	
the statement of case		
the evidence set out in the	ne box below	
necessary, please continue on a separate sheet		
1. Witness statement of Robert Watson dated 15th Febr		
<ol> <li>Witness statement of Martyn Stephens dated 19<sup>th</sup> Fe</li> <li>Witness statement of Katherine Ann Moreton dated</li> </ol>		
4. Witness statement of Philip Richardson dated 19th Fe	ebruary 2019 and its	exhibits.
5. Witness statement of Carol Ingleston dated 15th February Scholars statement of Soft Andrew Sci		
6. Wines severally of vog threaten oc	Tagori O 110 0	exhibits
tatement of Truth		
he applicant believes that the facts stated in this section (ar	nd any continuation	sheets) are true.
igned win man	Dated 22 Febru	uary 2019
Applicant's Solicitor		
ull name William Maxwell Hunt Rose		
Name of applicant's solicitor's firm Sharpe Pritchard LLP		
osition or office held Partner		
f signing on behalf of firm or company)		
Signature and address details		
Signed win m m		
SignedApplicant's Solicitor	Dated 22 Feb	ruary 2019
reportant 3 solution		
Position or office held Partner (if signing on behalf of firm or company)		
100 C		
Applicant's address to which documents about this application	ion should be sent	
harpe Pritchard LLP		If applicable
Im Yard	Phone no.	020 7405 4600
13-16 Elm Street	Fax no.	020 7831 1284
London	DX no.	353 London/Chancery Lane
Postcode WC1X 0BJ	Ref no.	WMHR/170.19
-mail address wrose@sharpepritchard.co.uk		
- Indiagoness wrosewsidibeblichdiu.cu.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

O CICITORIII	De	fend	ant
--------------	----	------	-----

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:

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.

- 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 workings days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the 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.
- The claim form and application notice shall be deemed served on Persons Unknown (Second Defendant) pursuant to CFR 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.

- 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.
- 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 BROUGH 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:

- 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
- 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
- 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.
- 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
- 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.
- 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

 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

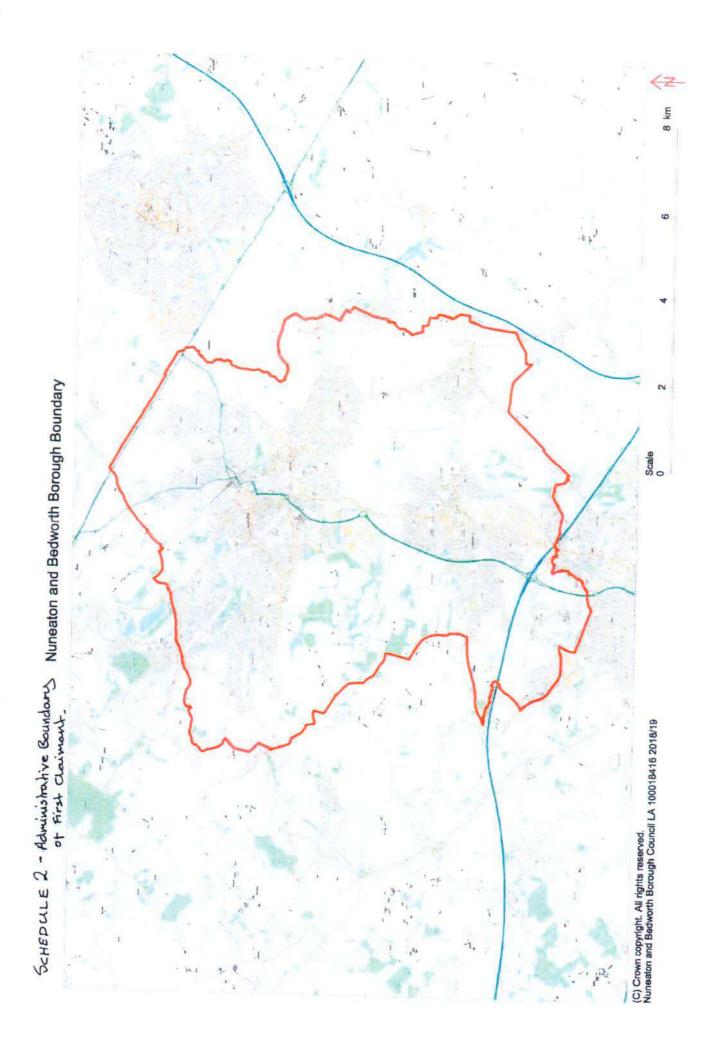
# List of Defendants and their addresses (redacted for service).

- (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

WE / X424-409B / 229314

- (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

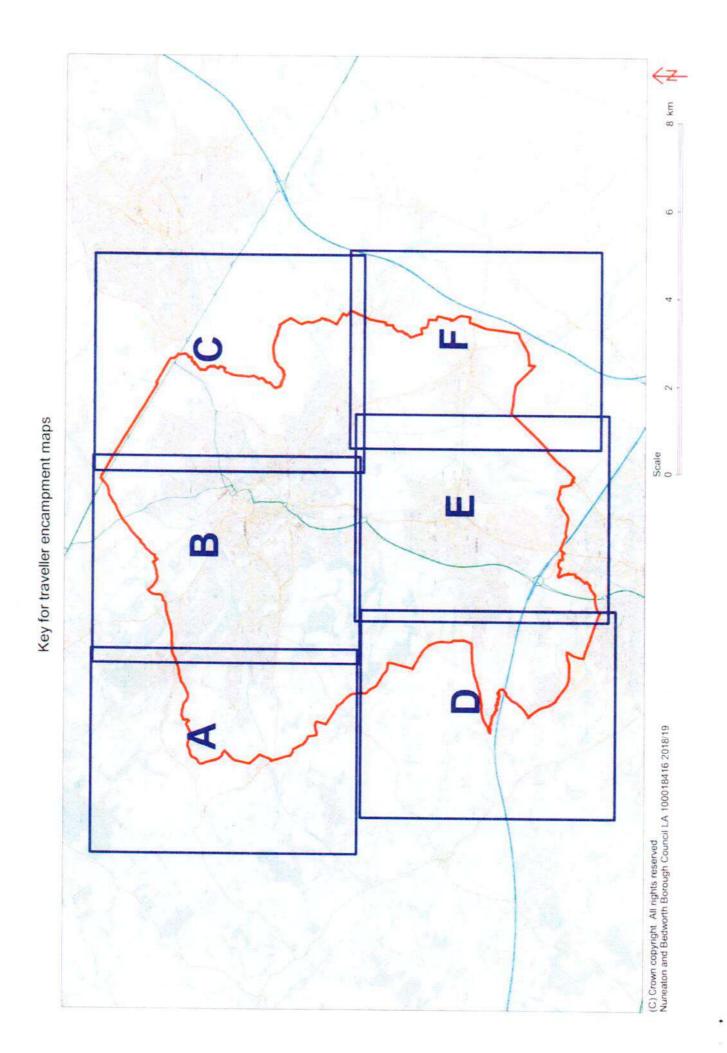


# SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

Price for the stood of the residue of	Common (CV16 9NJ) / land at Campbell Close, Nuneaton and land at to Galley Common, Nuneaton (CV10 9NJ)		CV10 9PZ	NBBC	WK447381/ WK439120/ WK244039/ WK238145
CV10 GPZ   NBBC			CV16 80F	NBBC	WK319146/ WK326554
According to the meaton   According to the meaton			,	NBBC	WK319145
The safe of the west of the we			CV10 ap7	NBBC	WKZ38447/ WKZ38145/ WK324522
and Farm, Smortal  Ansiely Road.  An	Land on the south side of Sherbourne Avenue, Numerica		CV10 9JH	NBBC	WK234444
and Farm, Smorrall  CV12 DuP  Ansiely Road  CV10 BUS  CV10 BUS  CV10 BUS  CV10 BUS  RBSC  RBSC  Ansiely Road  CV10 BUS  CV12 BUN  RBSC  Ansiely Road  Ansiely Road  CV12 BUN  RBSC  Ansiely Road  Ansiely Road  CV12 BUN  RBSC  Ansiely Road  Ansiely Road  CV12 BUN  RBSC  CV12 BUN  RBSC  CV12 BUN  RBSC  CV11 BUS  RBSC  CV11 BUS  RBSC  Ansiely Road  Ansiely Road  CV11 BUS  RBSC  CV11 BUS  RBSC  CV11 BUS  RBSC  RBSC  Ansielon and land at  RBSC  CV11 BUS  RBSC  RB		1	CV12.0HD	NBBC	WK281821
Analogy Road.  Analogy Piece Romany.  Analogy Piece Road.  Analogy Piece Road.  Analogy Piece Analogy Road.  Analogy			PANO DESE	Driveta	WK380708
Ansiely Road.  Ansiely Road.  An and land on the swest of course and land on the swest of court side	Land at Smoral Lane, Bedworth		CV12 0JP	NBBC	SK442087
Avieting Road.  Avieting Road.			CV10 8NN	NBBC	WK32497
The east of Ravelon on the seast of the west of the South side of the West of the We			CV10 90G	NBBC	WK32497
Sedencity   CV12 BNW   NBBC			CV10 &JX	NBBC	WK448137/WK448304/WK317827.
Marcaton and land on the South side of   CV12 BNM NBBC					WK448032
and sind on the east of Ravelor  and Land on the east of Ravelor  Authoriston  and Land on the east of Ravelor  Authoriston  Authoristo	Bedworth		CV12 BNW	NBBC	
and land at Exabeth			2		TO A TO SERVICE AND A SERVICE
are Park, Rye Piece         CV12 847         NBBC           are Park, Rye Piece         x         CV12 847         NBBC           and Rye Piece         x         CV12 847         NBBC           routh side off         x         CV11 6FB         NBBC           routh side off		,	CV12 98H	NBBC	WR.169700/ WRA48169/ WRZ50992/ WK44842
and Pank Rye Piece	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth		CV12 8JT	NBBC	WK449032
ash, Rye Piece	Bedworth Leisure Centre (Car Park) - Miners Wedare Park, Rye Piece	*	CV12 BNN	NBBL	WK449032
ABBC			CV12 8JT	Nonc	WK449032
Arrich Bedworth and   Arrich Bedworth and west of   Arrich Bed			and the second	NOOK!	and the second s
New Columbia			CVI28UG	NBBC	WK.366034
NBBC				NEGGC	WK448595
### A Wurkeston   * CV12 DAL   MBBC   ### A west of   * CV11 6FP   MBBC   ### A west of   * CV11 6FP   MBBC   ### A west of the west and   * CV11 6FP   MBBC   #### A west and   * CV11 6FP   MBBC   #### A west and   * CV11 6FP   MBBC   #### A west and   * CV10 0FP   MBBC   #### A west on the   * CV10 0FP   MBBC   #### A west on the   * CV10 0FP   MBBC   #### A west on the   * CV10 0FP   MBBC   #### A west on the   * CV10 0FP   MBBC   #### A west on the   * MBBC   #### A west on the   ### A west on the   ####				MBBC	WK295888/ WK460024/ WK448169/ WK31782)
NBBC	Land on the north and south sides of Newtown Road, Nuneaton		CV12 DAL	NBBC	WK449846
### ### #### #### #### ##### #########			CV116EP	NBBC	WK210986
And fand to the west (CV11 6YB) NBBC  VV11 6JH) ** CV11 6YL NBBC  Finck Sign Road, (CV11 6YL NBBC  Finck Sign Road, (CV11 6YL NBBC  And on the west and (NBBC  On and Land on the (CV10 0BN NBBC  CV11 6YL 6YL NBBC  NBBC  NBBC  NBBC  CV11 6YL 6YL NBBC  NBBC  NBBC  NBBC  CV11 6YL 6YL NBBC  NBBC  NBBC  CV11 6YL 6YL NBBC				NBBC	WK336798/ WK344607
Fincksky Road,			CV11 6YB	NBBC	WK447554/ WK319282
Introcking Road, CV11 6Y, NBBC and on the west and CV10 046 NBBC on and Land on the CV10 046 NBBC on and Land on the CV10 08N NBBC neation and land at NBBC NBBC NBBC NBBC NBBC NBBC NBBC NBBC		*	CV11 SJH	NBBC	WK446586
and on the west and  on and Land on the  on and land at  Numeration  N			CVITER	NBBC	WK336798/ WK447654
on and Land on the			- 19	NBBC	WK345480/ WK309853
on and Land on the			CV10 0HG	NBBC	WK448958
Name and land and land and land on   Name and   Name a	prof. 6		1000	and and a	WK448096/ WK448091
NBBC	North side of Hyde Avenue, Nunesion		CA10 DRN	NEBC	1207-120-120
Negoc   Nego	Land on the north side of Connithorne Avenue			NBBC	ME462385
Numeation and land ast   Numeation and land ast   Numeation   CV11 5PQ NBBC  CV11 4RE NBBC  CV11 4RE NBBC	Land on the south side of Avenue Road. Nune	1		NBBC	WK452276
Numeation and land att   Numeation and land att   Numeation and land on   COVITABLE NEBC  COVITABLE NEBC  COVITABLE NEBC  COVITABLE NEBC  COVITABLE NEBC	Land on the north side of Avenue Road, Nuneaton			NBBC	WK448965
Numeration cut to the east of Raveline lane. Numeration and land on cut 14RE NBBC cut 14RE NBBC CV114RE NBBC CV107BX NBBC	-			NRBC	WK449842/ WK449819
Ito the east of Ravelore Lane, Nurseaton and Nuneaton CV114RE NBBC Luneaton and land on		*	CV11 SPQ	NBBC	WK447475
uneation and land on CO10 7BX NBBC	and but yet		CV114RE	NBBC	WRAS2370/ WRAS2349/ WKA49486/ WRA49734
	Land lying on the north side of St Georges Way, Nuneaton and land on 36 the North side of St Georges Way, Chluvers Coton	2	CV10 78X	NBBC	WK448537/ WK344972

TO SECRETARION OF THE PROPERTY AND			
Bills and on the sands of business Dones Management	×1200	NBBC	WK448065
81 Land lying to the east of Eastboro Way, Nuneaton	CVITEXA	NBBC	WR(370915
Trinity Court Flats (Car Park) - land on the West side of Highfield Road.	Sept.		•
	-	NBBC	
		NBBC	
84 Land at Dunns Close, Noneaton		NBBC	
85 Land Wing to the West of Blackhorse Road, Bedworth		Private	WK394575
Attreborough Freids Farm, Numeaton and Land at Singsby Close, American Fields Intraction Entra Minneston		WCC	WK271545/-WK455358
Authorities and and a control of the	4 300 00 00 00		
87 Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	CV12 9EA	WCC	WK670015/WK424958
Ash Green Sports & Arts College, Ash Green Lane, Coversty (CV79AH)	ENG DASH	Drivate	45 20 20 20 20 20 20 20 20 20 20 20 20 20
	CV12 8AD	WCC	
90 (CV12 0HP)	CV12 OFF	WCC	WK424335
All Saints Bedworth C of E Primary School and Nursery, Bedworth **	CV12 9HP	WCC	Unregatered
Land on the West side of Weston Lane, Bulkington, Bedworth	CV12 9RT	WCC	WK79471
Land and buildings on the South side of Derwent Road, Bedworth	CV12 8RT	Private	WK225063
Land lying to the East of Coventry Road, Bedworth	CVT9FJ	WCC	WK33092
Keresiey Newland Primary Academy and Keresiey Newland School.	CV7.817	1000	
Grove Lane, Keresley, Coventry, (CV7 5.12)		WCC	WK427632/WK477207
Land lying to the South of Smorral Lane, Goodyears End, Betworth and	CV12 DHA	CANTO	Market Monte Autres 1465 to
Land lying to the South of smortal Lane Bedworth	17.00	10000	A PART OF THE PART
Wheelwright Lane Primary School, Ash Green, Coventry	100 Mary 100	MCC	/975/25/M
St Francis Roman Catholic School, Nicholas Street, Bedworth	CV1Z BJN	Private	Private Wildows
Land lying to the North of Rye Piece Ringway, Bedworth		Private	W8476876
Land on the East Side of Nicholas Street, Bedworth		MCC	WX171385
Land on the South Side of Hayes Lane, Exhall, Bedworth	CA7 9NS	MCC	WKI/M47
St James Church of England School, Barbridge Road, Bulkington,	CV12 9PF	Private	D2/1988
Playing fields at St. James Church of England Janior School, Barbridge			
Road, Bulkington, Bedworth, CV12 9PF		Private	WK822707
St Michael's Primary School, Hazel Grove, Bedworth, (CV12,9DA)	CV12 9DA	Private	WK479308
Land adjoining St Thomas More School, Greenmoor Road, Nuneaton,	CV10 7EX	-	
CV107EX		Private	WK478GF5
St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10		Private	WK477630
Arburo High School Greenmon Road Numerica		Private	
	CV11 SEL	WCC	Unregistered
of E Primary S	9 4 7 7 7 7		
(CV10 TAT)	CVIDIAL	Private	_
Land to the South of Tuttle Hill, Camp Hill, Nuneaton	CV10 90A	WCC	W#409218
Land lying to the South of Gipsy Lane, Nuneation	CV11 4SE	WCC	WK170501
Land at Judkins Quary Tuffle Hill, Nuneaton	CV10 0HU	WCC	WK393091
108 Chilvers Coton First School, Frank Street, Nuneation (CV11 5RB)	CV11 5RB	WCC	WKA24955
Land lying to the west of Northumberland Avenue, Numeaton	CV10 8ER	WCC	WX239413
Galley Common Intant School, Nuneaton	CV10 BNZ	WCC	Universitatived
a to the East of Hoba	CV116JS	WCC	Wr205172
Land on the south side of Save Close. Nuneation	CV10 7LW	WCC	WX178493
113 Middlemarch School, Nuneaton	CV10 78Q	WCC	Untegstered
Stockingford Junier And Infant School, Grave Road, Nuneaton (CV18	CV10 8HW		
8/Y)		WCC	WK425673
Land and buildings on the south aide of St Paur's Road, Nuneaton		WCC	
School at Coton Road, Nuneation	CV115TY	Private	WK226511
Our Lady of the Angels Infant School and St Josephs RC First School,		Private	Wrid27543
Dark Lane Dringer School Park Lane Nuneaton (CV10 8LU) and land	0.77		
on the North side of Ansley Road, Nuneaton	CV10 8NL	Private	WK470637
Land on the North Side of Ansiey Road, Nuneaton		Private	WK189736
Queens County Junior and Infant School, Bentley Road, Numeaton, CV11		-	41 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
N. N.		Private	W847379
St Pauls C of E Primary School Nuneaton	CV10 BWH	-	
Land at St Arne's RC Primary School Camp Hitl Drive Nureaton *	CAIGONA	Private	WK480568
St. Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton,		Private	WX40953
(7)	THE REAL PROPERTY AND ADDRESS OF THE PERSONS ASSESSMENT OF THE PERSONS		
Columns Debug Dance Dates Street Over Acts Acts	CV11 4CH	Private	WK468047

1	Claiwood Primary School, Morris Drive, Numeaton, CV11 4QH			MCC	WK233776
400	Playing field adjoining St Nicholas C of E Primary School, Windemere 121 Aveneue, Nuneaton CV11 6HJ		CV11 6HJ	wcc	WK473130
1.0	Land on the East Side of Windermere Avenue, Nuneaton			Private	WK131856
1 1	St Nicolas C of E First School, Windermere Avenue, Nuneaton, CV11 6HJ			Private	W8.473119
Emu	22 Land lying to the North East of Cakdene Crescent, Nuneaton	1	CV10 0DR	WCC	WK149023/WK216447
123	Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP		CV11 40P	Private	WK458966
-	124 Land on the North Side of Avenue Road, Nuneaton		CV11 4UJ	NBBC	WK448965
	125 Etone College, Leicester Road, Nuneation, CV11 6AA		CV11 6AA	WCC	WK425515
200	26 Higham Lane School, Higham Lane, Nuneaton, CV10 08J		CV10 083	Private	WK465311
100	27 Oakwood Primary and Secondary School, Morris Onive, Nuneaton, CV11 A	1	CV11 40H	WCC	WK458047/WK468048/WK233276
	128 Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academ	,	CV10 7PD	WCC	WK175243/WK425469
	North Warwichshire and Hinckley College, Hinckley Road, Nuneaton, 129 CV11 68H	,	CV11 68H	Private	WK428695
	130 King Edward VI College. King Edward Road. Nuneaton, CV11 48E.		CV11 4BE	Private	WK497842/WK497832
131	Bedworth Heath Nursery School, Glebe Avenue, Bedwodh, CV12 0DP		CV12 00P	MCC	WK426282
	32 Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
	Exhall Grange Special School, Wheelwright Lane, Coventry			Private	WKG40675
	Land at Exhall Grange School, Wheelveright Lane, Coventry, CV7 949	-	CV/ 9HP	Private	WK450903
	33 North Side of Griff Lane, Nuneaton		CV10 7SD	WCC	WK365844
	34 Land lying to the West of Leicester Road, Nuneaton	*	CV12 8AG	WCC	WK240628
11	Race Leys Middle School, Barton Road, Bedworth, CV12 8HG		CV12 8HG	Private	WK465841
Tien.	135 Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
17	Stockingford Junior And Intam School, Grove Road, Nuneaton (CV10 8JY	,	CV10 8JH	wcc	WK42667
1000	136 Land on the South West Side of Magyer Crescent, Noneaton		CV11 4SQ	WCC	WK23140
137	Attebrough Mils, Atteborugh Road, Nuneaton	*		Private	WK256088
	136 Manor Park Community School, Beaumont Road, Nuneaton	×	CVI15SS	Private	WK430022
	139 St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton		CV10 7SD	Private	wk442390
	140 Halfords - land and buildings on the south side of Newtown Road, Nuneath	×	CV11 SUT	Private	Private WK390614
10	A. A. Danier, of a Direct of Contract of the Print of Direct of All Interest of	,	CV10 7HC1	Deimark	Dainage, May 27 5 7 10



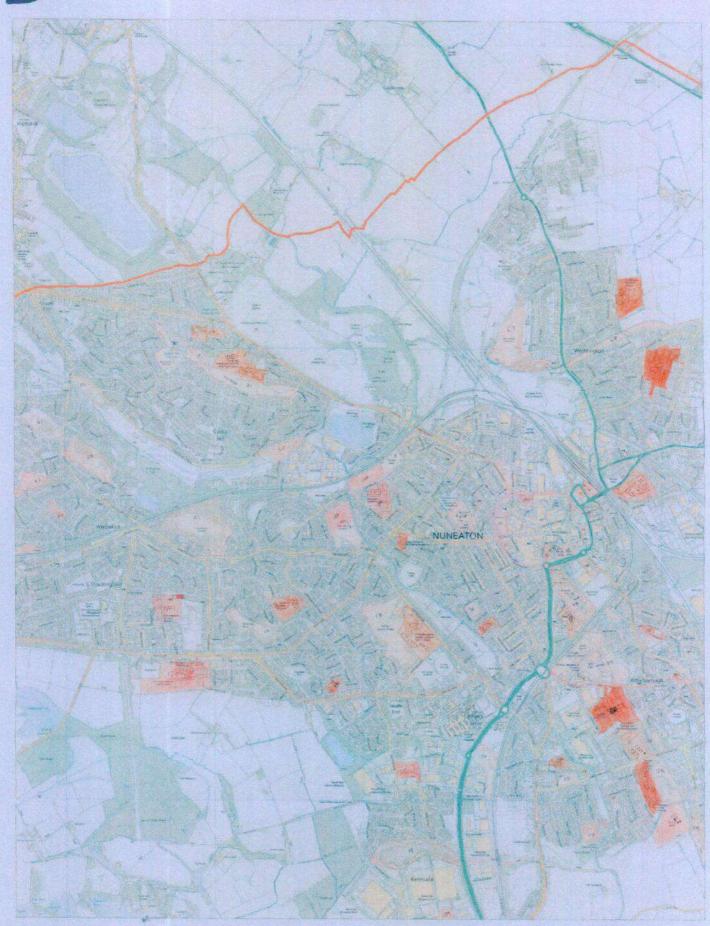


### **Northwest Nuneaton**



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

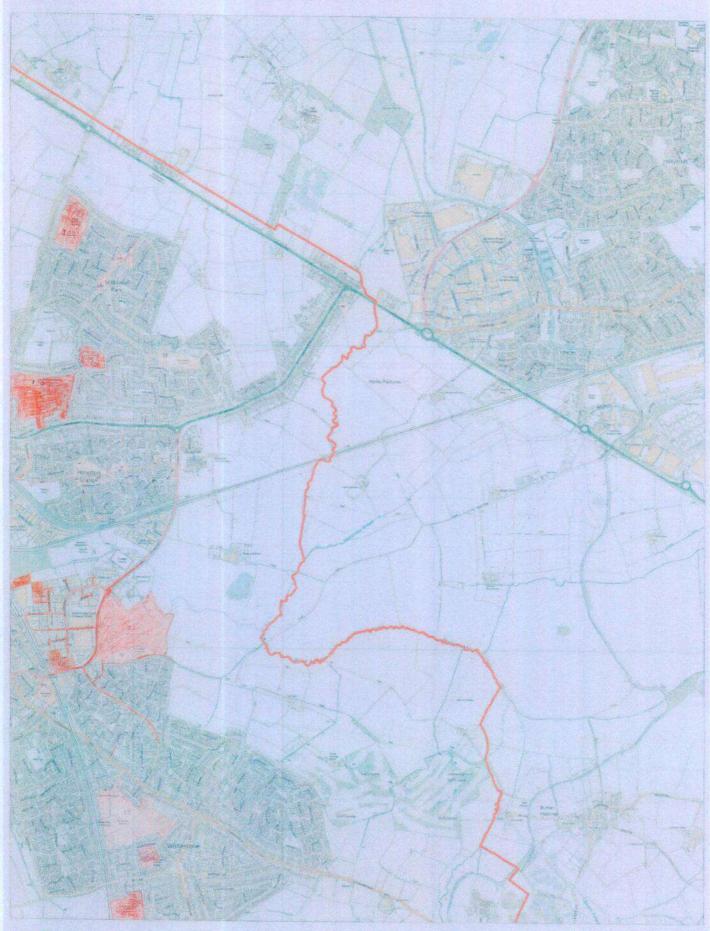
### **North of Nuneaton**



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19



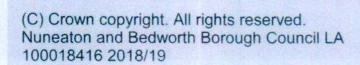
### **Northeast Nuneaton**

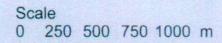


(C) Crown copyright. All rights reserved.

Nuneaton and Bedworth Borough Council LA
100018416 2018/19

# Southwest Bedworth







# South of Bedworth



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

Scale 0 250 500 750 1000 m

# F

# Southeast Bedworth



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

Scale 0 250 500 750 1000 m



# 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 - ANAL .

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 BROUGH 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:

- 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
- 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
- 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.
- 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:

- 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.
- 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

 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 15<sup>th</sup> March 2019 "HMM1-HMM2"

# IN THE HIGH COURT OF JUSTICE

QB-2019-000616

# QUEEN'S 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

# 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 22<sup>nd</sup> February 2019, between 14.03hrs on Friday 8<sup>th</sup> March 2019 and 9.09 hrs on Monday 11<sup>th</sup> 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 22<sup>nd</sup> February 2019 and the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> 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 22<sup>nd</sup> February 2019 and the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> 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

# IN THE HIGH COURT OF JUSTICE QUEENS BENICH DIVISION

QB-2019-000616

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

"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 Injuction against Unauthorised Encampments Claim number: QB-2019-000616

# Schedule of named defendants served by Harry Michael Mellor

					Date & Tir	Date & Time Served	Comico
					5	ייר אבו אבת	Service
6	Dennis Stokes	12 Bashely Road Caravan Site, Bashley Road		NIM10 CTU	04/00/00	,	
15	Patrick Maughan	12 Bashelv Road Caravan Site Bashley Boad		HIGOTAN	08/03/19	14:03hrs	Letter Box
40	Roseleen Ward	6 St Agnells Lane		NW10 6TH	08/03/19	14:03hrs	Letter Box
26	Leonard Monghan	8 pendles Paddock Marland	nemel nempstead	HP2 7AX	08/03/19	15:05hrs	Letter Box
1	Michael Stokes	29 Oaktree Field Caravan Site Odetock Book	Stokenchurch, High wycombe	HP14 3UW	08/03/19	16:07hrs	Letter Box
00	Michael Stokes	6 Horsdean Travelers Site Braynool Lane	Sallsbury	SP2 8BY	08/03/19	17:55hrs	Letter Box
		and book sales	Fatcham Brighton	BN18PP	08/03/19	19:55hrs	Letter Box
21	Martain Maughan	81 Constitution Road	Chatham	MAEC 20M	04/00/00		
34	Kathleen McDonaugh	3 Orchard View	Horsean Cido Broate	MIES / DIN	09/03/19	07:05hrs	Letter Box
	Thomas Corcoran	7 Sandiacre	lone of the prentwood	CM14 55U	09/03/19	07:40hrs	Letter Box
	Jessica Dodd	7 Sandiacre	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
	Michael Dovle	6 Sandiacre	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
_	Luke Delanev	12 Sandiagra	long Green, Cressing , Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
	Patrick McGinley	7 Sandiagra	long Green, Cressing , Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
	Alphonsus McGinley	7 Sandiagra	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
~	John Maughan	14	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
16	Owen Maughan	7 Sandiacro	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
20	Franics Maughan	14 Sandiacra	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
33	Aaron McDonaugh	9 Sandiacre	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
24	Martin Mongan	14 Sandiacre	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
- 55 Th	Brian Stokes	12a Orchard Drive	long Green, Cressing, Braintree	CM77 8DL	09/03/19	08:42hrs	Letter Box
	Martin McDonaugh	29 Spevside Court	Smithy Fen, Cottenham	CB24 8PT	09/03/19	09:45hrs	Letter Box
42	John Connors	2 Costalot Stables Heath Boad	Orton, Southgate	PEZ 6SN	09/03/19	10:47hrs	Letter Box
	Tracey Brown	20,000		LE67 1DG	09/03/19	12:10hrs	Letter Box
-	Dennis Stokes (JNR)	Caravan 6 Dun Roamin Dark		NN3 SHQ	09/03/19	13:20hrs	Letter Box
	John McDonaueh	Caravan 7 Dun Boamin Dark		NN13 5TD	09/03/19	14:10hrs	Letter Box
	q	Caravan 14 Dun Donnin Port	Whittield, Brackley	NN13 5TD	09/03/19	14:10hrs	Letter Box
		70 Exton Avoning	Whitfield, Brackley	NN13 5TD	09/03/19	14:10hrs	Letter Box
	0.00	Avenue	Luton	LU2 OLI	09/03/19	15:20hrs	Personal Service
-		9 Limehouses, Boathorse Road,	Stoke-on-trent	ST6 400	11/03/19	07.406.50	
ш	angh	37 Boathrse Road	Stoke-on-trent	ST7 41A	11/03/19	07.451115	Letter Box
١		8 Imari Park, 38 Russell Street		DF24 8AI	11/03/10	SIIIC+.10	xog Jane
α :	sh	9 Russell Street		DF24 8AI	11/03/19	09:09:05	Letter Box
¥	Kathleen Ward	2 Imari Park, 38 Russell Street		DE24 SAL	11/03/13	09:09	Letter Box
				DL44 OAL	11/03/13	09:09hrs	Letter Box

82 62 8 129

QB-2019-000616

# IN THE HIGH COURT OF JUSTICE 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

"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



# Nuneaton and Bedworth Borough Council Town Hall, Coton Road, Nuneaton Warwickshire CV11 5AA

www.nuneatonandbedworth.gov.uk 024 7637 6376

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
- Application for Injunction dated 22 February 2019
- 3. Order of HHJ Dove for alternative service dated 22 February 2019
- 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 Benun pivision

Claim no.

QB-2019-000616

Fee Account no.

Help with Fees -Ref no. (if applicable)

HWF.

Claimant

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

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

**to** Master



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

YNO

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



Court fee

£ 528.00

See attached for further details

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.

96-2019-000616

# 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 issued 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 www M. - . m

\*(Claimant)(Litigation friend) (Legal representative) position or office heldpartner

(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 APPER ATON WILL BE HEARD AT THE ROYAL COURTS OF ILL STRAND TO NOON DATE 1913 (19 TIME TEC IN A COURT TO BE CONFIRMED

Claim no.	08 3010 000616
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
egal Representat	TEB 2019 .
	SENCH DIA
int	SENCH DIA.
ant er attached for the	e reasons set out in the witness ardson and Carol Ingleston and
er attached for the	e reasons set out in the witness
er attached for the preton, Philip Rich	e reasons set out in the witness ardson and Carol Ingleston and
er attached for the preton, Philip Rich  Yes  at a hearing at a teleph	e reasons set out in the witness ardson and Carol Ingleston and  No  without a hearing
er attached for the preton, Philip Rich	e reasons set out in the witness ardson and Carol Ingleston and
er attached for the preton, Philip Rich  Yes  at a hearing at a teleph	e reasons set out in the witness ardson and Carol Ingleston and  No  without a hearing

	Sharpe Pritchard LLP			100	FEB 2019 .
A	re you a Claimant C	Defendant 🗵	Legal Repre	sentative 8	NCH DIVISION
	Other (please specify)				
If	you are a solicitor whom do you repre	sent Clair	mant		
W	/hat order are you asking the court to r	make and why?			
	The Claimant seeks an injunction in the statements of Robert Watson, Martyn their exhibits.				
Н	ave you attached a draft of the order y	ou are applying for	⊠ Yes		No
Н	ow do you want to have this application	n dealt with?	⊠ at a	hearing	without a hearing
			ata	telephone h	nearing
Н	ow long do you think the hearing will l	ast?	2	Hours	Minutes
15	this time estimate agreed by all partie	s?	Yes		⊠ No
G	ive details of any fixed trial date or per	riod	-		
٧	What level of Judge does your hearing n	eed?	High	Court	
٧	Who should be served with this applicat	tion?	Defe	ndants	
	lease give the service address, (other t	han details of the			

the attached witness statement   the statement of case   the statement of case   the evidence set out in the box below    If necessary, please continue on a separate sheet   the statement of Robert Watson dated 15° February 2019 and its exhibits. 2. Witness statement of Martyn Stephens dated 18° February 2019 and its exhibits. 3. Witness statement of Martyn Stephens dated 19° February 2019 and its exhibits. 4. Witness statement of Philip Richardson dated 19° February 2019 and its exhibits. 5. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15° February 2019 and its exhibits. 6. Witness statement of Carol Ingleston and its exhibits. 7. Witness statement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement of Truth 10° February 2019 and its exhibits. 7. Witness tatement	10. What information will you be relying on, in support of yo	our application?	
In 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 15th February 2019 and its exhibits. 3. Witness statement of Philip Richardson dated 15th February 2019 and its exhibits. 4. Witness statement of Philip Richardson dated 15th February 2019 and its exhibits. 5. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol ingleston dated	the attached witness state	ement	
1. Witness statement of Robert Watson dated 15th February 2019 and its exhibits. 2. Witness statement of Martyn Stephens dated 15th February 2019 and its exhibits. 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 Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston Applicant's Solicitor Patent Inglesson dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston Applicant's Solicitor Patent Inglesson dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston Applicant's Solicitor Patent Inglesson dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Inglesson Applicant's Solicitor Patent Inglesson dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Inglesson Applicant's Solicitor Patent Inglesson dated 15th February 2019 and its exhibits. 6. Witness takenting 15th February 2019 and its exhibits. 6. Witness takenting 15th February 2019 and	the statement of case		
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.  3. Witness statement of Katherine Ann Moreton dated 19th February 2019 and its exhibits.  4. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  5. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness tatement of Carol Ingleston dated 15th February 2019 and its exhibits.  6. Witness tatement of Carol Ingleston dated 15th February 2019 and its exhibits.  7. Witness tatement of Carol Ingleston dated 15th February 2019 and its exhibits.  8. Witness tatement of Carol Ingleston dated 15th February 2019 and its exhibits.  8. Witness tatement of Carol I	the evidence set out in th	e box below	
2. Witness statement of Martyn Stephens dated 18th February 2019 and its exhibits. × 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 Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Carol Ingleston dated 15th February 2019 and its exhibits. 6. Witness statement of Truth  The applicant believes that the facts stated in this section (and any continuation sheets) are true.  Statement of Truth  The applicant believes that the facts stated in this section (and any continuation sheets) are true.  Stigned 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 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  Phone no. 020 7405 4600  Fax no. 020 7831 1284  DX no. 353 London/Chancery Lane			14 vs 400
The applicant believes that the facts stated in this section (and any continuation sheets) are true.  Signed 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 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  Postsodo WCTV ORL  Dated 22 February 2019  If applicable Phone no. 020 7405 4600  Fax no. 020 7831 1284  DX no. 353 London/Chancery Lane	<ol> <li>Witness statement of Martyn Stephens dated 19<sup>th</sup> Fel</li> <li>Witness statement of Katherine Ann Moreton dated 19<sup>th</sup> Fel</li> <li>Witness statement of Philip Richardson dated 19<sup>th</sup> Fel</li> <li>Witness statement of Carol Ingleston dated 15<sup>th</sup> February</li> </ol>	bruary 2019 and its 19 <sup>th</sup> February 2019 bruary 2019 and its uary 2019 and its ex	exhibits. × 2 and its exhibits. exhibits. xhibits.
Applicant's Solicitor  Full name	Statement of Truth		CERUCIS
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 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  Partner O20 7405 4600  Fax no. 020 7831 1284  DX no. 353 London/Chancery Lane	The applicant believes that the facts stated in this section (an	d any continuation	sheets) are true.
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 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  Postcodo WC1Y OBL  Pos		Dated 22 Febr	uary 2019
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 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  Postcodo WC1Y OBL  Pos	Full name William Maxwell Hunt Rose		
Position or office held Partner  If signing on behalf of firm or company)  11. Signature and address details  Signed 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  Postsodo WCIX OBL  Post			
11. Signature and address details  Signed			4.000
Signed 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  Portrado WCIX ORL  Dated 22 February 2019  If applicable Phone no. 020 7405 4600  Fax no. 020 7831 1284  DX no. 353 London/Chancery Lane			
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  Postsedo WCIX ORI  Postsed			
(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  Postsodo WC1X ORL  Phone no.		Dated 22 Feb	oruary 2019
Sharpe Pritchard LLP			
Phone no.   020 7405 4600     13-16 Elm Street   Fax no.   020 7831 1284     London   DX no.   353 London/Chancery Lane	Applicant's address to which documents about this application	on should be sent	
13-16 Elm Street  Fax no. 020 7831 1284  DX no. 353 London/Chancery Lane	Sharpe Pritchard LLP		If applicable
London DX no. 353 London/Chancery Lane	Elm Yard	Phone no.	020 7405 4600
Postsodo WC1X ORI	13-16 Elm Street	Fax no.	020 7831 1284
Postcode WC1X 0BJ Ref no. WMHR/170.19	ondon	DX no.	353 London/Chancery Lane
	Postcode WC1X 0BJ	Ref no.	WMHR/170.19
E-mail address wrose@sharpepritchard.co.uk	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

Det	er	1da	n	ts
	_	-	_	_

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:

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.

- 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 workings days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the 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.
- The claim form and application notice shall be deemed served on Persons Unknown (Second Defendant) pursuant to CFR Part 6.14, 8.15, 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.

- 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.
- 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 BROUGH 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:

- 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
- 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
- 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.
- 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:

- 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.
- 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)
- 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

 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

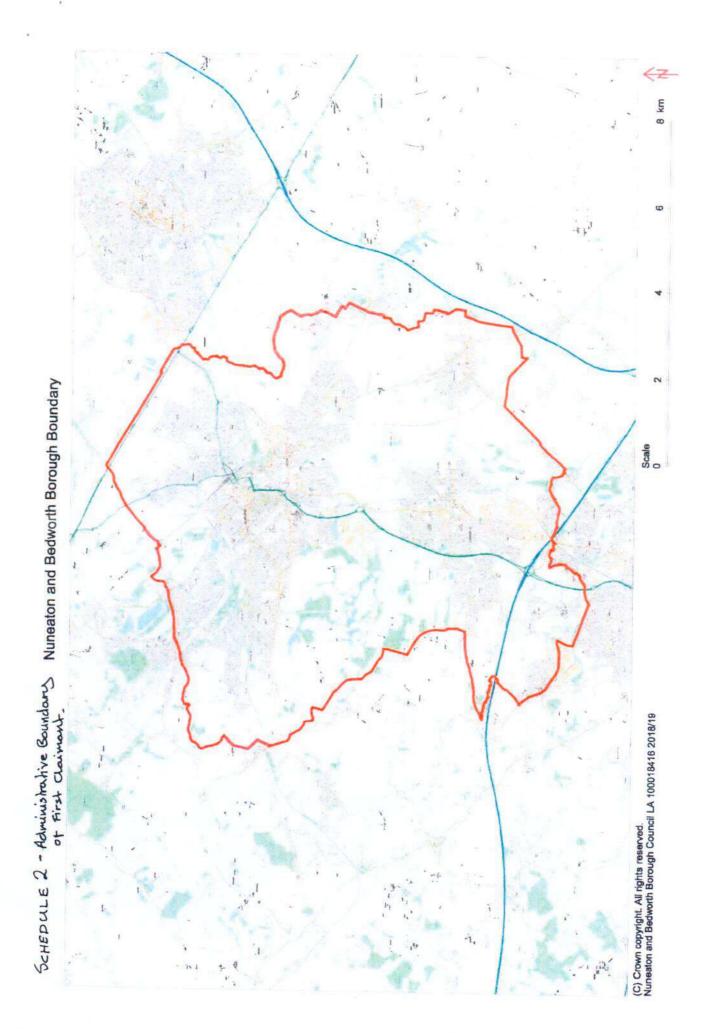
# List of Defendants and their addresses (redacted for service).

- (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

WE / X424-409B / 229314

- (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



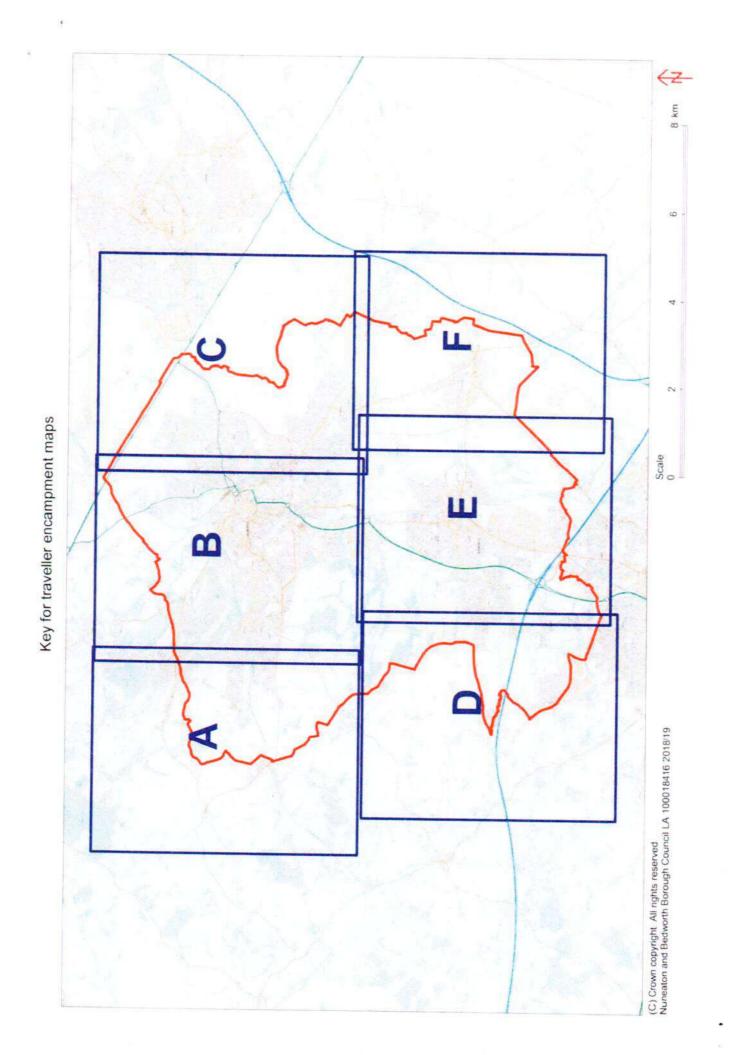
# SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

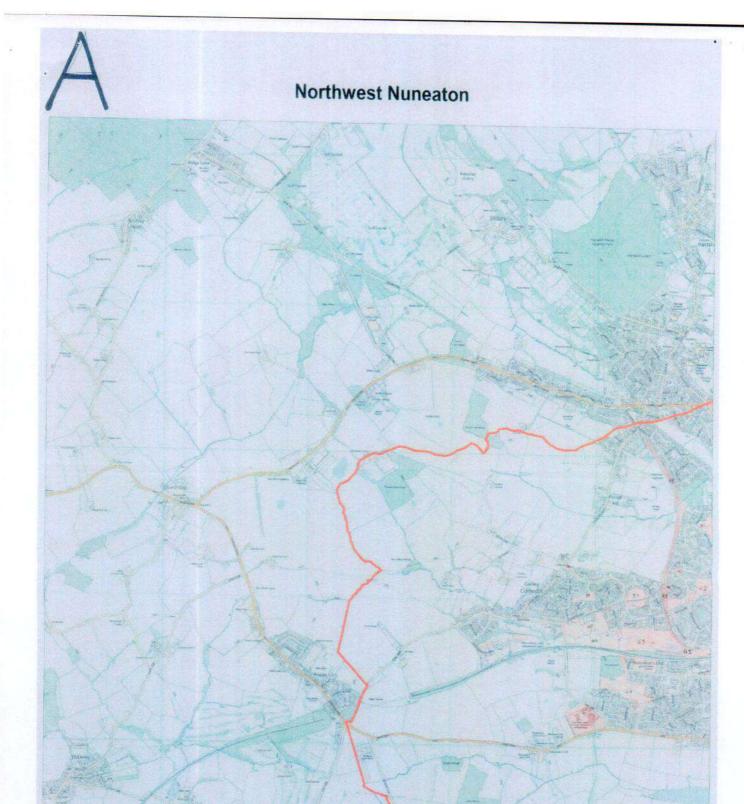
Aureation - CV11 5P2 NBBC NBBC NBBC NBBC NBBC NBBC NBBC NBB	BUT ON the north wide of Communities States to assistance	sause g<	BOOTEON	Land Owner	
South Wees   CV11 &CV11			CO24 603	MBBC	1
11.5R4	emons Lane and land lying to the South West		2 10 11 20	ACCOUNT OF	
1584)	south west side of Corporation Street.		CVI+ 6745	Negar	-
Store of   No.   CV11 68W   Private	See Day Day Day and ED Mathewa Erroad Managaria (1914 - ED)		200	NBBC	-
North et al.   No.   CV11 469V   Private			CV11 SQE	NBBC	_
1			CV11 4BW	Private	_
Single of   Sing	east sides of Vicarage Street, Nuneaton		CV11 5DB	NBBC	•
New Col	Coton Road, Numeaton, (CV11 5TY)		CV114BS	Private	-
A	e sorth side of		CV11 SNE	MBBC	WK251517
			CV11 4AS	NBBC	1
Name			CV11 SAA	NBBC	+-
A			CV11 4AL	NBBC	1
Needing   Need			CV11 SAA	NBBC	
The south of the s			CV11 5JF	NBBC	WK448678
North of the	of to the south side of Bermudailand lying to the east and west of entry Rojad, Chilivers Coton/land on the west side of a road leading Covertry to Nuneation and a balancing take and land to the south of				WK446511/ WK284250/ WK345891
on the North of North of Name of				NBBC	
North of the	reation Ground at Easybord Way, Nuneaton		CV114PV	NBBC	
Anoth of the country	d on south side of Lutterworth Road, Nuneaton		CV11 6QA	NBBC	WK489027
North of   North of   Negac	Bying to the north east of Braemer Way, Nuneatron, Land on the seast and north east sides of Greenmoor Road & Land syng to the heast side of croff road.		CV10 7EL	NBBC	WK48784/ WK448021/ WK448237 (part)
	I lying to the east of Westbury Road and Land lying to the North of set Street Numerican				WK342561/ WK355962
Fine   CV12 8DP   NBBC	s at Recreation Ground, Tomkinson Road, Nuneaton		CV10 8DS	NBBIC	Wikaa736K
CV12 B/PF   NBBCC	at Whittleford Park, Haunchwood Road Nuneaton, land lying to the				CONTRACTOR OF THE PROPERTY OF
Need	CASE OF THURSDAY ROAD		CV10 8PY	NBBC	200 Tanada 600 100
Second   S	of the north side of Marston Lane Radworth		CV12 8DR	NBBC	WK448160
NBBC	ast of High Street e Ringway Bedworth &		CV12 8NF	WBBC	WK448256 WK448876/ WK246825/ WK448601
### CV12 8LH NBBC #### NBBC ###################################	T			NB8C	
### NBBC  12.992)			CV12 BLH	NBBC	WK448511
Taylor Covider Need Need Need Need Need Need Need N	Bulkington,			NBBC	WK448611/ WK448624(part)
on g on the CV10 9C1 NBBC on GV10 9C2 NBBC on GV10 9C2 NBBC or GV10 9C2 NBBC overity CV10 9C2 NBBC overity CV1	Bulkington, Bedworth and land at Eustace Road		CV12 9RF	NBBC	WKA4851D/ WKA48500
ini. CV10 9CA NBBC  ini. CV10 9CA NBBC  ini. CV10 9CA NBBC  Lane. CV7 9CX NBBC  ioverity V CV7 9CX NBBC  icand V CV19 9CD NBBC  icand V CV19 9CX NBBC  icand V C			CV12 9£7	NBBC	WK449849
9 on the CV10 9DJ NBBC  Ha. CV10 9DE NBBC  Llane CV7 9EX NBBC	on the south west side of Queen Estabeth Road, Nuneston		CV10 9DA	NBBC	WK439320
CV10 9CE NBBC	luneaton and land lying on the		CV10 9DJ	NBBC	WH648197/ WH648093
Lane			200 0502	ABBA	WK373679/ WK448013
Lane	T		THE REAL PROPERTY.	0000	
Lane	T			NBBC	WK44/731
Overity / CV7 9KZ NBBC / CV7 9KZ NBBC / NBBC / CV7 9KZ NBBC / NBC / NBBC / NBC / NBBC	ional Ground - land lying to the north of School Lane.		100000000000000000000000000000000000000		W. (C. A. C.
CV7 BVG   NBBC			CV7 9EX	NBBC	Musconopi
NBBC			CAY BNG	NBBC	WK124031
1 Land * CV7 9GZ NBBC * CV7 9GZ NBBC				NBBC	WK336223
CV10.9TD NBBC	all, Bedworth and Land		CV7 9G7	NABAC	WK143891/ WK154857
			CV10 9TD	_	WERSEAG

Common (CV10 SNJ) / land at Campbell Close, Nuneaton and land at 40 Galley Common, Nuneaton (CV10 RNJ)		Z46 01/2	NBBC	WK447381/ WK439120/ WK244039/ WK238145
Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the north east side of Merlin Avenue, south	4			
east side of Freesland Rise. Whitteford and land lying to the West of 41 Bucks Hill	5	CV10 9QF	NBBC	WRSTELEN WRSSChabe
Land on the east and west side of Sherbourne Avenue. Whittieford, 42 Nureation.			NBBC	WK319145
Land on Galley Common, Nuneaton, land at Galley Common Nuneaton at land is and on the south side of Plough Hill Road. Spockingford	6	7.440 GD7	Jogn	WK238447/ WK238145/ WK324522
		HOUND	NRRC	(A)(C)14444
	,	CV12 DHD	NBBC	
				1
40 Land at Smorrall Lane Bedworth		CV12 OGE	Private	-
48 Land on the North side of Ansiey Road, Stockingford		CV10 8NN	NABAC	WK 442567
Kingswood Road Rec - Land on the North side of Ansley Road.		CV10 806	Napar	WK32497
Land on the west side of Westbury Road. Numeaton and land on the north-east side of Grove Road. Numeaton and land lying to the west of			NOON I	WK448137/WK448304/ WK317827
50 humeaton Road	,	CV10 8JX	NBBC	
dedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, 51 Bedworth	5	CV12 BNW	NBBC	WK449032
52 Land lying to the West side of Blackhorse Road, Bedworth	×	CV6 67E	Private	WK394575
Land on the North side of Bulkington Road and land on the South side of Johnson Road/Jawa Wilkon Centre. 38 Nuiveation Road, Bedworth (CV12 RA) I and land Ninto to the west of Whorthon Steels and land at Floatwell.	12			WK169700' WK448169! WK250992/ WK448429
53 Centre Johnson Road	×	CV12 98H	NBBC	
Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Sa Ringway Bedworth	3	POST STATE OF	Amoun	WK449032
Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece		No. of the last	1000	Table a selection
55 Ringway, Bedworth		CV 22 BYON	NBBC	VPRA 4 SULL
Miners wertare Park (Car Park) - Miners Wettare Park, Rye Piece 56 Ringway, Bedworth	×	CV12 8JT	NBBC	WK449032
Bedworth Railway Station (Car Park) - Land on the north side of	*	CV12 &UG	-	WK366034
58 Land at Arbury Avenue. Bedworth	×		NBBC	S×446000
Land lying to the east of Amos Jacques Road Collycroft, Bedworth and	n			
	s		NBBC	WK295888/ WK460024/ WK448169/ WK317827
60 Land on the north and south sides of Newtown Road, Nuneation		CV12 DAL	NBBC	WK449846
		CV11 6EP	NBBC	WK210986
Land at homeon usange, wereation and land ying south and west of Camborne Drive. Nurseation	×		NBBC	WR.336798/ WR.344607
Land lying to the south of Hinckley Road, Nuneston and land to the west 6.3 of Clovelly Way.	w Te	CV11 6YB	NBBC	WK447654/ WK319282
64 Recreation Ground, The Long Shoot, Nuneaton, (CVIII 6JH)		CV116JH	NBBC	WK446886
Land at Horseton Grange and land to the south of Hinckley Road, 65 Nuneston	>	CVITEM	NBBC	WK336798/ WK447654
Land on the east side of Changebrook Close and land on the west and 66 least side of Pallett Drive, Numeaton			NBBC	WM345480: WM309653
67 Land on the south side of Church Lane, Nuneaton		CV10 0HG	NBBC	WK448958
Land on the north side of Brookdale Road, Nurseaton and Land on the 68 North side of Ryde Avenue. Nurseaton		NB0 C170	- Summer	WK448096/ WK448091
g Land at Bradestone Road, Nuneaton			NABAC	WKesthess
70 Land on the nodh side of Donnithorne Avenue. Nuneaton	*		NBBC	WK452385
I Land on the south side of Avenue Road, Nuneaton			NBBC	WK452276
2 Land on the north side of Avenue Road, Nuneaton	8		NBBC	WK448965
Land on the north side of Lonhithorne Avenue, numerion and land at 73 Knebley Crescent, Numeration			NBBC	WK449842/ WK449819
14 Land on the south-west side of Mariborough Road, Nuneaton	*	CV11 5PQ	NBBC	WK447475
Land at Donnthome Avenue, Nureation land lying to the east of Raveloo Drive Nureation, land on the east side of Marstor, Lane, Nureation and 15 Land on the east and west sides of Marston Lane, Nureation	90	CVITARE	NBBC	WR452370! WK452349! WK449466! WK449734
Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chibago Colon.		Company of the Company		WK448537/ WK344972
		1.V101 / 100 X	March Co.	

70 to 10 to	VICTOR ETV	NISSE WALANDER	[WWW.AROCOG   WAR ARON 77]
and on the court side of Autoria Data Nicosatro	X X X X X X X X X X X X X X X X X X X	NBBC	•
Land lying to the east of Eastboro Way, Nuneaton	CVITEXA	T	+
Tonity Court Flats (Car Park), land on the West side of Highfield Road		t	
1809 Court Falls (Car Falls) - land on one vees oute or regiment house.	x CV11.4PW	NBBC	WK31006?
Land at Acacia Crescent, Bedworth		NBBC	WK448428
Land at Dunns Close, Nuneaton	×	NBBC	WX452330
Land lying to the West of Blackhorse Road, Bedworth		Private	WK394575
Attleborough Fields Farm, Nuneation and Land at Slingsby Close.		TANSA C	SALES OF SALES COMMENTS SALES
Affieborovon Fields Industrial Estate, Nuneaton		Mark	ANTICA STORY AND STORY OF THE S
Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	CV12 9EA	WCC	WK.870015. (WK.42.495.8)
Ash Green Sports & Arts College. Ash Green Lane. Coventry (CV79AH)	CV7 9AH	-	
Back Level Indiant Cohoral Darkmonth	CV12 RAD	WCC	Washington
Cookings Fox County Fort Robot Design County and Bedunds	0.00		
CONTROL LINE CORNEY THE COLORS, DOMINING CINEST, LINES, DOCUMENTS,	CV12 DHP	wcc	WK424335
All Saints Bedworth C of E Primary School and Nursery. Bedworth	* CV12 94P	WCC	Unregistered
Land on the West side of Weston Lane, Bulkington, Bedworth	* CV12 9RT	WCC	WK79471
Land and buildings on the South side of Derwent Road, Bedworth	CV12 8RT	Private	WK225061
Land lying to the East of Coventry Road, Bedworth	* CV7.9FJ	WCC	WK33092
Keresley Newland Primary Academy and Keresley Newland School.	CVORD		
Grove Lane, Keresiey, Coventry, (CV7 8JZ)		WCC	W#427632/W#4772G7
Land lying to the South of Smorral Lane, Goodyears End, Bedworth and	CV12 DHA	WOO	Mary Dieze Auger 146659
Wheelstooth I are Directly School Ast Color Country	CV7 9HN	WCC	WK425257
Chranic Boman Catholic School Micholia Stead Radgeoth	CV12 8.N	Private	Private We262596
and him to the Month of Rue Dane Ringson Referents		Private	Private WK476476
and on the East Side of Nicholas Steel Redworth		WCC	WK171388
Land on the South Side of Mayes Lane, Exhall Bedworth	CV7 946S	WCC	WK171647
St James Church of England School, Barbridge Road, Bulkington,	300 0100		
Bedworth (CV12 9PF)	THE ZIAN	Private	WK461720
Playing fields at St. James Church of England Junior School, Barbridge Doed, Bullinger, Bedwerth, P.V.12 60E		Private	966422707
St Michael's Primary School Hazel Grove Bedworth (CV12 9DA)	CV12 90A	Private	
and adjoining St Thomas More School Greenmoor Road, Nuneaton,	1		
CV10 7EX	CVIONEX	Private	WK478035
St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10		Private	WK4.7530
Artsun High School Greenmoor Road Nuneaton		Private	
Abbay Cef E letant School Numerton	V CV11 SEL	WCC	
All Saints C of E Primary School & Nursery Knebley Crescent, Nuneaton	a de la constitución de la const		
(CV10 2AT)	CATGORI	Private	WK461748
Land to the South of Tuttle Hill. Camp Hill. Nuneaton	CV10 90A	WCC	WK409218
Land lying to the South of Gipsy Lane, Nuneaton	CV11 4SE	WCC	WK170501
Land at Juckins Quary Tuttle Hill, Nuneaton	CV10 OtV0	WCG	WX393091
Chlivers Coton First School, Frank Street, Nuneaton (CV11 5RB)	x CV115RB	WCC	WKA24955
Land lying to the west of Northumberland Avenue, Nuneaton	CV10 BER	WCC	WK239413
Galley Common Infant School, Nuneaton	x CV10 9NZ	WCC	Unregistered
Land lying to the East of Higham Lane, Nuneston	CV116.5	MCC	WK205172
Land on the south side of Skye Close, Nuneaton	× CV107LW	WCC	WK178493
Middlemarch School, Nuneaton	CV10 780	WCC	Unregistered
Stockingford Junior And Infant School, Grove Road, Nuneation (CV10	CV10 8HW	3000	Anthony To Chill
BATTO		DOM:	ACCURATION OF
Colonia of Pictor Doug Actions and Colonia Col	VI CVII STV	Drivate	-
During a control roles, by the Region School and St. Incentive RC First School			
Coton Road, Nuneaton, CV11 5TY		Private	WK477543
Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land	CA10 SNE		
on the North side of Ansiey Road, Noneston		Districts	WK470637
Custo on the World Side of Austrey Road, Nutriesson Custon Chinds Union and Infant School, Bentley Road, Nutrieston CVT1			
SLR		Private	WK473379
St Pauls C of E Primary School, Nuneaton	* CV10 8NH		Unregistered
Land at St Anne's RC Primary School, Camp Hill Drive, Nurseaton	* CV10 0JX	Private	Private witd80568
<ol> <li>Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, 1970.</li> </ol>		Drivate	Discussion
CVICOLA			VC/Cabyra
The state of the s	PONT ADM	Drivate	Private withsold?

T Promise and	Live I And Work and the Control of t			2224	45.5.5.5.5.5.4.4.4.
aying field veneue, N	Playing field adjoining St Nicholas C of E Primary School, Windemere Aveneue, Nunsaton CV11 6HJ	CO	CV11 6HU	WCC	WX473130
ind on the	Land on the East Side of Windermere Avenue, Nuneaton			Private	WK131856
St Nicolas C 6HJ	St Nicolas C of E First School, Windermere Avenue, Nuneaton, CV11 6HJ			Private	W8473119
nd hing to	122 Land hing to the North East of Oakdene Crescent, Nuneaton	CV	CV10 0DR	WCC	WK149023/WK216447
nd at Geo	123 Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP	A)	CV1140P	Private	WK458966
nd on the	124 Land on the North Side of Avenue Road, Nuneaton	A)	CVIT ALU	NBBC	WK648965
one Colle	25 Etone College, Leicester Road, Numeaton, CV11 6AA	CO	CV11 SAA	MCC	WK425515
tham Lan	126 Higham Lane School, Higham Lane, Nuneaton, CV10 08J	NO.	CV10 08J	Private	WK465311
Kwood Pa	127 Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11.4	3	CV1140H	WCC	WK468047/WK468048/WK233776
o guid pu	128 Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academ	5	CV10.7PD	WCC	WK175243/WK425489
North Warw CV11 68H	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 88H	ò	CV11 68H	Private	Private WKG28695
g Edward	130 King Edward VI College, King Edward Road, Nuneaton, CV11 48E	CV	CV11 4BE	Private	Private WK497842/WK497832
dworth Hs	Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP x	CV.	CV12 0DP	WCC	WK426282
hall Grans	132 Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
half Grans	Exhall Grange Special School, Wheelvinght Lane, Coventry			Private	WK440475
od at Exth.	Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP	S	CV7 9HP	Private	WK450903
offi Side o	North Side of Griff Lane, Nuneaton	20	CV10 7SD	WCC	WKEES844
of lying to	34 Land lying to the West of Leicester Road, Nuneaton	3	CV12 BAG	WCC	WK240628
ce Leys &	Race Leys Middle School, Barton Road, Bedworth, CV12 8HG	S	CV12 8HG	Private	WK465841
nd and bu	135 Land and buildings on the south side of St Paul's Road. Nuneaton			WCC	WKSBOORS
ckingford	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8,1Y /	AD CO	CV10 8JH	WCC	WK42667
od on the	36 Land on the South West Side of Magyer Crescent, Nuneaton x	3	CV11 4SQ	WCC	WKZ3146
45norde)	137 Attiebrough Wills, Affieborugh Road, Nuneaton			Private	WK256088
nor Park	38 Manor Park Community School, Beaumont Road, Nuneaton x	S	CV11 SSS	Private	WK430022
Davids W	39 St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	S	CV10 7SD	Private	Private weds7390
flords - ian	140 Halfords - land and buildings on the south side of Newtown Road, Nunears	CV	CV11 SUT	Private	WK390614
-					

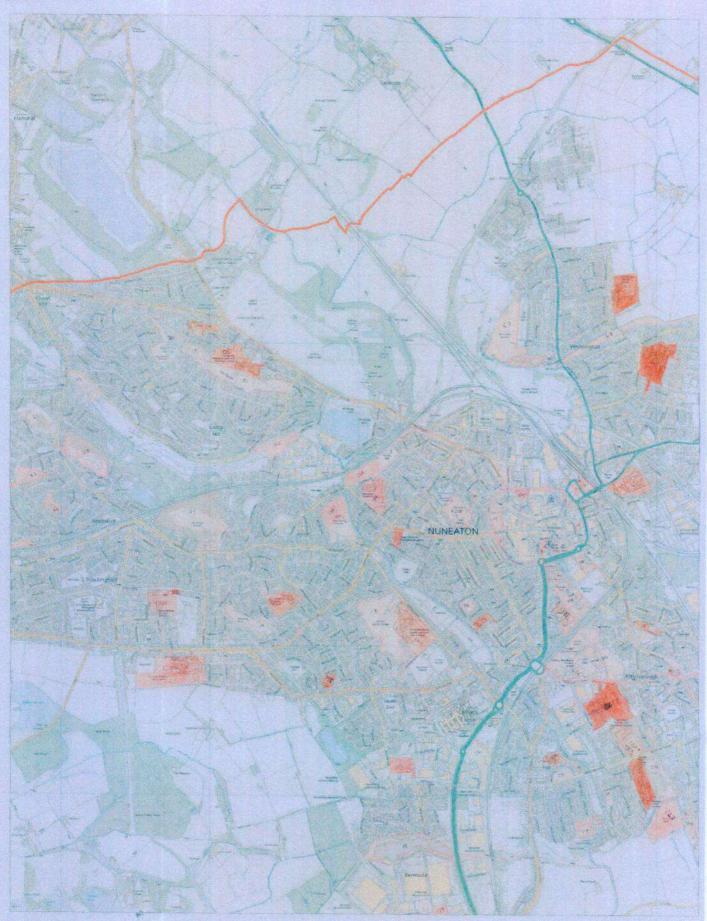




(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

Scale 0 250 500 750 1000 m

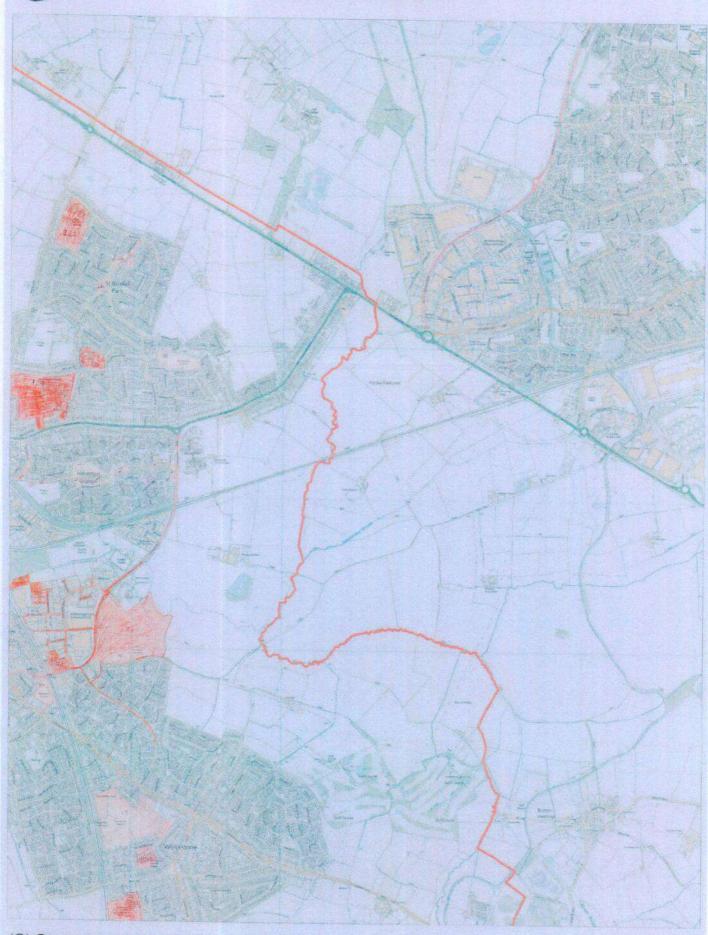
# **North of Nuneaton**



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

Scale 0 250 500 750 1000 m

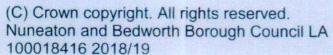
# **Northeast Nuneaton**



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

Scale 0 250 500 750 1000 m

# Southwest Bedworth



Scale 0 250 500 750 1000 m

# South of Bedworth



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

Scale 0 250 500 750 1000 m

# Southeast Bedworth



(C) Crown copyright. All rights reserved. Nuneaton and Bedworth Borough Council LA 100018416 2018/19

Scale 0 250 500 750 1000 m 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 - ANAL .

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 BROUGH 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:

- 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
- 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
- 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.
- 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:

- 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
- 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.
- 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

 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 15<sup>th</sup> March 2019 "JAI 1-JAI 3"

# IN THE HIGH COURT OF JUSTICE QUEENS BENICH DIVISION

QB-2019-000616

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** 

### 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 22<sup>nd</sup> February 2019, between 07.30hrs on Monday 11<sup>th</sup> March 2019 and 15.50 hrs on Wednesday 13<sup>th</sup> 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 22<sup>nd</sup> February 2019 and the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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 4<sup>th</sup> 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.

- A schedule detailing the exact site number, number of orders served; site name and date 2. of time served is now produced and shown to me marked "JAI1"
- True copies of of the Order of the Honourable Mr Justice Dove dated 22<sup>nd</sup> February 2019 3. and the sealed Claim form dated 22 February 2019; sealed Application Notice dated 22<sup>nd</sup> February 2019; Sealed Order dated 22<sup>nd</sup> 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: 15<sup>th</sup> March 2019

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** 

"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:

15<sup>th</sup> March 2019