

Dated 5th November 2025

Claim No: QB-2019-000616

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

B E T W E E N :

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

Claimants

– and –

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

Defendants

FIRST WITNESS STATEMENT OF AMY PITTAM

I, **Amy Pittam**, solicitor to the Council at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, Warwickshire CV11 5AA will say as follows:

1. I am a solicitor at the First Claimant, Nuneaton and Bedworth Borough Council (the '**Council**'). The Claimants apply pursuant to paragraph 7 of the Order of the Honourable Mr Justice Cotter dated 17 December 2024 (amended under the slip rule and re-sealed on 28 January 2025) for the continuation of the injunction and power of arrest within that Order for a further 12 months against Persons Unknown (the '**Continuation Application**'). I make this statement in support of the Continuation Application. I am authorised by both the Council and the Second Claimant, Warwickshire County Council, to make this statement.
2. This statement is made from facts and matters which are within my own knowledge, save where indicated otherwise, and which I believe to be true. Where a matter is not within my knowledge, I identify the source of the information and believe the same to be true. This

statement has been prepared following conference calls and email exchanges with the Claimants' legal advisers.

3. I exhibit to this witness statement a bundle of documents marked **AP1**. Where I refer to that exhibit I shall do so in the format **AP1/exhibit number**.

INTRODUCTION

4. On 17 December 2024, Cotter J granted the Claimants final injunctive relief against 33 Named Defendants until and including 17 December 2029. Further, the Judge granted injunctive relief against the 54th Defendant, a defined category of Persons Unknown. In accordance with the principles set down by the Supreme Court in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* [2023] UKSC 47 (*'Wolverhampton'*), that relief was granted for a period of one-year, with the option to apply for the continuation of the relief if so advised. I shall refer to the injunction against the 54th Defendant as the **'Injunction'**. I exhibit a copy of the Order at **AP1/1**.
5. A power of arrest was attached to the prohibitions of the Injunction (both as against the Named Defendants and Persons Unknown), pursuant to the Police and Justice Act 2006, s27.
6. The Injunction, as against both Persons Unknown and the Named Defendants, is a so-called 'Traveller injunction', and prohibits the formation of unauthorised encampments and the depositing of waste (ie. fly-tipping). The Injunction is **not** borough-wide against Persons Unknown, nor has it ever been, and captures only 142 sensitive sites in the administrative area of Nuneaton and Bedworth (the **'Borough'**). The Injunction, as it applies to the Named Defendants, is borough-wide.
7. Pursuant to paragraph 7 of the Order of Cotter J, the Claimants were given the express liberty to apply for the renewal of the Injunction against Persons Unknown. The Claimants now make that Application. Absent renewal, the Injunction will expire at 00:00 on 18 December 2025.

Content of this statement

8. In this statement, I shall cover the following:

- i. Background to the proceedings and the Continuation Application;
- ii. The injunctive relief sought;
- iii. How the Council responds to unauthorised encampments;
- iv. The success of the Injunction;
- v. The continuing need for injunctive relief;
- vi. Engagement with the Traveller community;
- vii. Stopping provision in the Borough.

9. The Claimants also rely on the witness statements of Martin Rone-Clarke, Gypsy and Traveller Liaison Officer at Warwickshire Police, and Sarah Matile, Planning Manager (Policy) at the Council.

BACKGROUND

10. The Claimants commenced proceedings by way of a Part 8 Claim Form issued on 22 February 2019. The claim for injunctive relief was made in the discharge of the Claimants' public functions pursuant to the Town and Country Planning Act 1990, s187B to restrain breaches of planning control (that being the material change of use of the relevant land) and the Local Government Act 1972, s222 (specifically to restrain acts of trespass and various nuisances, and to restrain repeated breaches of directions to leave land made under the Criminal Justice and Public Order Act 1994).

11. The Council is the local planning authority for the Borough. The Second Claimant, Warwickshire County Council, is the local highway authority for the county of Warwickshire, in which the Borough is situated, and in whom the adopted highways are vested.

12. The claim was brought in response to the high numbers of unauthorised encampments that were being experienced in the Borough. In the claim, the Claimants' evidence showed that between April 2015 and the end of 2018, approximately 103 unauthorised encampments

were experienced in the Borough; this included 80 encampments that had formed on the Council's land, six on land vested in the Second Claimant and 17 on privately owned land.

13. The sites that were being targeted by unauthorised encampments typically included open green spaces, business sites, sports and recreation areas and facilities, car parks and sites close to schools. The sites were often accessed through forced entry, causing damage to land and property.
14. The formation of unauthorised encampments caused significant harm to the Borough and the inhabitants of the Borough. Those harms, which were explored in full in the Claimants' evidence included:
 - i. the fly-tipping of waste (including green waste, household waste and general rubble/ building waste);
 - ii. the depositing of untreated human excrement at encampment sites. This is especially concerning where the encampment has formed on land facilities used by children. The failure to practise proper sanitation risks the spread of disease and infection. The Claimants' evidence included examples of the following (which are not exhaustive):
 - a. raw sewerage was left behind on the school fields at Vernons Lane (this was an especially large encampment of 32 caravans) in September 2018;
 - b. excrement and soiled nappies and toilet paper was deposited in hedges at the Keresley Community Centre in both May 2017 and July 2018;
 - c. bottles of urine, as well as excrement in clothes, nappies and bedding were thrown over the fence and into the Wembrook Primary School playground when unauthorised encampments formed on adjacent land (that being Pingles overflow car park);

- d. human excrement, soiled nappies and toilet tissue was left on the perimeter of the Camp Hill Primary School in April and September 2017 by an unauthorised encampment that had formed on adjacent land;
 - e. human excrement was left behind at the Bermuda Phoenix Community Centre in August 2018 by a large encampment comprising around 30 caravans;
- iii. public open spaces, sports and recreation facilities being unavailable to the public both during an encampment and during the clean-up process after an encampment (especially where untreated human waste is being removed). Often this would lead to community tensions, and altercations between the occupants of encampments and the inhabitants of the Borough;
- iv. threats, and the use of, force and violence against the inhabitants of the Borough. The Claimants' evidence included multiple examples of altercations between members of encampments and inhabitants of the Borough, some of which escalated into physical violence. Examples included, but were not limited to, the following:
 - a. in August 2018, the co-ordinator of the Bermuda Phoenix Community Centre reported having two teeth knocked out in an altercation with occupants of an encampment;
 - b. in May 2017, the administrator at the Keresley Community Centre reported being threatened with a bladed weapon when trying to prevent a group of Travellers accessing the site; and
 - c. in January 2019, the manager of the Nuneaton Harriers Club reported that they were slapped across the face by a youth from an encampment when asking that person to leave the running track;
- v. the Claimants' evidence also included two examples of a school having to close by reason of the formation of an unauthorised encampment in April and September 2017. The school was closed for a combined total of five days;

- vi. costs incurred in cleaning-up after encampments (by both the Claimants and private landowners) and in guarding against encampments and preventative measures;
 - vii. various anti-social behaviours, including verbal abuse and intimidating and threatening behaviour from occupants of unauthorised encampments.
15. The sites targeted by the unauthorised encampments were often not suitable sites for an encampment to form on, especially where an encampment caused harms of the nature described above; they were sites that had a high public footfall and usage, including by children.

Procedural history

16. Following issue, the claim endured an extended procedural path on its way to final hearing.

In summary:

- i. on 22 February 2019, an alternative service order was granted by Dove J;
- ii. on 19 March 2019, interim injunctive relief was granted by Timothy Straker QC (sitting as a Deputy Judge of the High Court). I exhibit a copy of the Order at **AP1/2**;
- iii. the claim was then brought into the *Barking and Dagenham* litigation by Nicklin J, which culminated in the appeal to the Supreme Court in *Wolverhampton* in February 2023. The appeal determined the question of whether and in what circumstances final injunctive relief could be granted against newcomer persons unknown and, if so, what safeguards were required. The Claimants were successful respondents in the Supreme Court, with judgment being handed down on 29 November 2023;
- iv. following *Wolverhampton*, directions were made and the claim came to ‘final’ hearing before Cotter J in December 2024 (the relief only being ‘final’ against the Named Defendants, following *Wolverhampton*), and the Injunction was granted.

Unauthorised encampments since the grant of injunctive relief

17. The Claimants' evidence in the claim showed that, from the grant of the interim injunction on 19 March 2019 to June 2022, the Borough experienced at least 12 unauthorised encampments. Seventeen further encampments were then recorded between June 2022 and the Claimant's final updating evidence in September 2024.
18. I have reviewed the witness statement of Martin Rone-Clarke, upon which the Claimants also rely on this Continuation Application. Whilst the date ranges in which his data is presented are different to the Council's, it does appear that Mr Rone-Clarke has recorded more encampments than the Council, especially in the period 2019 to 2022. There could be many reasons for the discrepancy in the data recording. In particular, if an encampment is not reported to the Council, and is short lived, it may not be attended by the Council and be recorded. Given Mr Rone-Clarke's specialist role, and his strong community contacts, it is unsurprising if he were to receive the first report of an encampment, and be the first to respond. Discrepancies in the data are unavoidable when multiple agencies are trying to record the formation of unauthorised encampments, and may sometimes simply be due to differences in recording methods.
19. Overall, the discrepancy in the data is limited and, as it was the Council's data that was relied on in December 2024, the data upon which the grant of the Injunction was based was actually more favourable to Persons Unknown.
20. Mr Rone-Clarke's data shows a dramatic drop in the number of unauthorised encampments forming in the Borough following the grant of the interim injunction in 2019 (save for an unusual blip in 2023 which, as I shall explain shortly, coincided with a period in which the power of arrest attached to the Injunction prohibitions was discharged, or at least treated as being discharged).

INJUNCTIVE RELIEF SOUGHT

21. As set out above, and as it applied to Persons Unknown, the Injunction prohibits the formation of unauthorised encampments and the depositing of waste on the 142 sites set

out at Schedule 3 of the Order (the ‘**Injunction Sites**’). The relief is due to expire at 00:00 on 18 December 2025.

22. The Claimants seek the continuation of the Injunction and power of arrest for a further 12 months.
23. The Draft Order produced with the Continuation Application contains minor typographical and stylistic changes from the Order made by Cotter J on 17 December 2024, as well as any changes necessary to reflect that the Order does not in any way relate to the Named Defendants. Some small amendments have been made to the prohibition at paragraph 1(a) and to the definitions used in the Order, which bring the Order into line with the other orders of this nature; Counsel will explain these minor changes at the hearing on 3 December 2025.
24. In line with the *Wolverhampton* guidance, the Draft Order provides for the expiry of the continued Injunction after a period of one-year, with the option for the Claimants to make an application for its continuation (if so advised).

The 142 Injunction Sites

25. As was explained in the Claimants’ evidence in the claim, the 142 Injunction Sites were selected by reason of these sites having been targeted by unauthorised encampments or, in some cases, being sites of a similar nature to those that have already been targeted by unauthorised encampments.
26. The Injunction Sites are sites where it is inappropriate (and harmful) for unauthorised encampments to form; many of the sites are used frequently by the inhabitants of the Borough, with many provided by the Council for the specific use and enjoyment of the inhabitants of the Borough. As set out above, the Injunction Sites include areas such as public open spaces, business sites, sports and recreation facilities, car parks and land close to schools. In selecting the Injunction Sites, the Claimants were, and remain, mindful of the need to balance the rights of the inhabitants of the Borough (to whom the Claimants owe various duties) and the nomadic way of life of the Gypsy and Traveller community; the Claimants’ view is that the selection of the 142 Injunction Sites strikes that balance,

and is a proportionate response to the wrongs that have already been suffered and which are further apprehended.

27. When preparing this Continuation Application, I asked the Second Claimant to use its mapping tools to calculate the area of the Borough, and the area covered by the 142 Injunction Sites. The Second Claimant informs me that the area of the Borough is approximately 78.91 square km/ 30.47 square miles. The maps of the Injunction Sites had not been digitised, so this needed to be done in order to arrive at a figure for the area of the Injunction Sites. I am informed that there are several potential sources of inaccuracy, but that the Second Claimant's calculation, with that caveat attached, is that the total area covered by the Injunction Sites is approximately 4.45 square km/ 1.72 square miles. In percentage terms, that means that the Injunction Sites equate to around 5.6% of the Borough.
28. When preparing this Continuation Application, the Council has considered whether the 142 Injunction Sites require any further additions, or whether any sites should be removed from the scope of the Injunction. On balance, the Council considers that the Injunction should continue to capture all 142 sites; the Injunction Sites were selected carefully, and it is considered that this still represents the best balance between the rights and interests of the various communities.
29. The 142 Injunction Sites are only a small portion of the Borough; there are still very many sites in the Borough where an unauthorised encampment can stop and form without being in breach of the Injunction. Further, the Injunction does not act as a blunt exclusion/prohibition from the Injunction Sites, and the Injunction prohibitions have built in safeguards by which an encampment can stop on an Injunction Site without being in breach of the Injunction; most notably, those forming an encampment will not be in breach of the Injunction if they have formally negotiated with the Council to stop on the site.

The power of arrest

30. The Claimants seek the continuation of the power of arrest that support the Injunction prohibitions. The power of arrest is what gives the injunction its force and utility in restraining the formation of unauthorised encampments. Cotter J was satisfied that the

conditions for the grant of the power of arrest were met in December 2024 (as was the Deputy Judge when granting interim relief in March 2019). It is pleasing that there have been no further incidents since December 2024 which display the harms (including threats and use of force or violence) that justified the power of arrest; that shows the efficacy of the Injunction (and not that the threat of such harms has dissipated), such that the power should be continued along with the prohibitions.

31. Without the power of arrest, the Claimants are left with the option of enforcement by way of contempt proceedings. As against Persons Unknown, this is especially unsatisfactory and inefficient, and would undermine the Injunction as, in reality, there would probably be very little consequence for breach. Contempt proceedings require the identification of those in breach of the Injunction to enable the proceedings to be prepared, issued and served. As was explored in detail in the claim, it is often impossible to identify those on the land for a multitude of reasons; often those forming encampments choose not to engage with the Council, give incorrect or incomplete identification details and, where vehicle registration data is used to identify those persons forming the encampments, issues such as cloned plates and incorrect or complete data held by the PNC and/or DVLA often thwarts attempts at identification.
32. I should make clear that the use of the power of arrest is a last resort, and it has never in fact been relied upon. The Council prefers, and has found it effective, to pursue a constructive approach by which officers of the Council visit an encampment and serve a copy of the injunction orders (where applicable and engaged) and engage with the occupants and explain the effect of those orders. Only if an encampment refused to move on after this engagement would the use of the power of arrest be considered.

HOW THE COUNCIL RESPONDS TO UNAUTHORISED ENCAMPMENTS

33. Whilst there have been very few unauthorised encampments forming in the Borough in the last two years (which, as I shall set out below, the Council says is as a result of the efficacy of the injunctive relief), the Council does still have a standardised process for responding to unauthorised encampments that do form.

34. Upon receiving a report of the formation of an unauthorised encampment, officers from the Private Sector Housing Team will visit the encampment as soon as reasonably possible. At that visit, they will try and establish the identity of the occupants, how many occupants, caravans and associated vehicles are present, why the encampment has formed, and the intentions of those at the encampment (and specifically how long they intend to stay for). A welfare check and assessment will also be completed; officers will make enquiries as to whether there are any vulnerable persons present at the encampment, and assess whether there are any welfare needs. The officers will also make enquiries to determine who the landowner of the relevant land is.
35. If the encampment has formed on an Injunction Site, a copy of the Injunction will be provided to those present, and the officer will explain what the Injunction means, and how it operates (including with the power of arrest). The Council's aim is to engage constructively with the members of the encampment to educate them on the Injunction and assist their understanding; a constructive relationship is more likely to lead to a positive outcome, and reduce the chances of future breaches of the Injunction.
36. If the encampment has formed on an Injunction Site, the encampment will usually be requested to vacate the land. A short but reasonable period will generally be given to allow the orderly packing up and vacation of the land. However, the Injunction is not enforced blind to any compelling welfare needs, and the Injunction has the built-in safeguard that a breach will not be committed if the encampment is present on the land by way of a negotiated stop. Therefore, if there is a compelling welfare need identified, and the Council considers that the encampment should be tolerated on the Injunction Site (rather than being directed to an alternative site), a stopover can and will be negotiated. That stopover will always be subject to the condition that the encampment should remain clean and tidy, and that there should be no nuisances caused by the encampment; the Council's Parks, and Green Spaces department will provide bins to assist with keeping the stopping site tidy.
37. The above process has proved effective. The Council has never needed to enforce the Injunction by way of the power of arrest or contempt proceedings; encampments generally tend to move on swiftly when informed of the power of arrest.

38. Where the encampment has formed somewhere other than on an Injunction Site, the officers visiting the encampment will first establish whether there are any Named Defendants present at the encampment; if there are, the abovementioned process will be followed, as the Injunction is borough-wide as against the Named Defendants. If there are no Named Defendants present, the officers will continue to undertake the abovementioned welfare checks and consider what harms are likely to be caused by the encampment, and whether there is a reason to tolerate the encampment and negotiate a stop. If there is no reason to tolerate, the encampment will again be given a short but reasonable period in which to vacate. If the encampment remains in situ, the Council (or the Second Claimant or Warwickshire Police, as applicable), must then have recourse to the various powers under the Criminal Justice and Public Order Act 1994 to remove the encampment (which powers I shall explain further below).
39. As explained in the Council's evidence in the claim, the Council previously responded to unauthorised encampments in accordance with the standards and procedure set out in the County-wide 'Dealing with Unauthorised Encampments in Warwickshire Protocol 2017' (written by the Police and Crime Commissioner for Warwickshire), which was exhibited in the claim. That Protocol has since been reviewed and updated, most recently in September 2025, and I exhibit a copy of the September 2025 Protocol at **AP1/3**. The Council also has its own flow chart that records its own process and how it responds to unauthorised encampments, which I exhibit at **AP1/4**, and which was last updated in 2019 (shortly after the grant of the interim injunction); further updates to that flow chart are now being considered, especially as the position with the power of arrest is settled, and will be actioned once the outcome of the Continuation Application is known. There are two processes documented; one where the injunctive relief can be relied upon, and the second where powers under the Criminal Justice and Public Order Act 1994 are to be relied upon.
40. I should also add that, in its updating evidence of September 2024, the Council alerted the court to the possibility that the interim injunction had not been served on every encampment (where its terms were engaged) that formed up to the end of 2023. That was due to a high turnover of staff, such that not all officers were up to speed with the process at that time. As I have mentioned above, there had also been some confusion regarding the power of arrest, and the Council was anxious and cautious not to represent that it was in force whilst its status was unclear. The position with the power of arrest is now clear, and it is in force.

THE SUCCESS OF THE INJUNCTION

41. The Injunction, and its predecessor orders, have been successful in reducing the frequency of unauthorised encampments forming in the Borough, especially on the 142 Injunction Sites. As set out above, the data presented by the Claimants in the claim record the following:

| Date range | Number of encampments |
|---|------------------------------|
| April 2015 to the end of 2018 | 103 |
| 19 March 2019 to June 2022 (ie. after the grant of the interim injunction) | 12 |
| June 2022 to September 2024 | 17 |
| December 2024 onwards (i.e after the grant of the Injunction) | 3 |

42. During the course of the *Barking & Dagenham* litigation, Nicklin J discharged the power of arrest that had been attached to the prohibitions of the interim injunction as against Persons Unknown (by way of an order dated 24 May 2021 **AP1/5**). I note that the data shows an increase in the number of encampments following the discharge, until its re-instatement by Cotter J in December 2024. When the Court of Appeal allowed the Claimants' appeal (along with that of the other local authorities), it was not clear whether the power of arrest had been reinstated; therefore, the Council took a cautious approach and proceeded on the basis that it had not. The data therefore suggests that there is a correlation between the power of arrest and lower encampment numbers.

43. None of the three unauthorised encampments that have formed in the Borough since the grant of the Injunction has formed on an Injunction Site.

44. The Claimants' evidence in the claim showed that, when unauthorised encampments did form on Injunction Sites, they were able to be moved on swiftly with the assistance of the Injunction. As such, the duration of encampments has also fallen by reason of the Injunction.

Reduction in harms suffered

45. The reduction in the frequency and duration of unauthorised encampments in the Borough has also caused a reduction in the harms that are suffered by reason of those encampments.
46. For example, the Claimants' presented the following data in relation to legal and eviction costs incurred by the Council by reason of unauthorised encampments:

| Item of cost | 2018/2019 | 2019/2020 | 2021/2022 | 2022/2023 | Total |
|--------------|--------------|----------------|-------------|-------------|----------------|
| Court costs | £3140 | £32,924 | | | £36,334 |
| Eviction | £5983 | £3,980 | £735 | £280 | £10,977 |
| Total | £9393 | £36,903 | £735 | £280 | £47,311 |

47. That table shows that, following the grant of the interim injunction, the legal and eviction costs incurred by the Council fell dramatically; this is because the injunction orders, rather than other powers, could often be relied upon to remove encampments. It should be remembered that the Council has finite resources and is spending public money in the discharge of its public functions, so the reduced spend is welcome.
48. When preparing this witness statement, I have reviewed the Council's budget records and cannot find a record of any court fees having been incurred in relation to unauthorised encampments (save for in these injunction proceedings) since 2023.
49. The Claimants' evidence in the claim was also that, between 2012 and 2015, the Council spent approximately £64,000 on target hardening measures to try and prevent the formation of unauthorised encampments (this included the hire of concrete blocks to restrict access to open spaces). The Council still incurs costs of this nature, and is not wholly reliant on the Injunction to protect sensitive land in the Borough.
50. To that end, I exhibit at **AP1/6** a spreadsheet that shows the costs that have been incurred in 2025 in protecting land from the formation of unauthorised encampments (which is in the sum of £10,125).

51. Since the grant of the Injunction in 2024, none of the three unauthorised encampments that have formed in the Borough have been associated with fly-tipping or the depositing of human waste, such that this harm (and the costs associated with clearing up after such waste deposits), has fallen to nil in the last year.
52. Generally, since the grant of the interim injunction in 2019, incidents of fly-tipping and the depositing of waste have reduced; the reduced frequency and duration of encampments often means that there is reduced scope for such harms to occur. However, some encampments were still associated with such harms, with the most recent example in the Claimant's evidence having occurred in September 2023 when a large unauthorised encampment formed on Injunction Site 76 (Middlemarch Recreation Ground), and which lasted for approximately nine days (this being in the period when it was unclear if the power of arrest was in force). Costs in the sum of £6,055.61 (or £7,266.73 including VAT) were incurred by the Council in cleaning up after the encampment, which included the removal of tipped and human waste.

Unauthorised Encampments since December 2024

53. Since the grant of the Injunction on 17 December 2024, there have been three unauthorised encampments in the Borough. None of these encampments have formed on Injunction Sites.
54. In his witness statement, which I have reviewed, Martin Rone-Clarke has given details of two of those unauthorised encampments (which formed on 13 May 2025, and between 24 March to 4 April 2025). Until informed of those two encampments, the Council had been unaware of their formation; as I have mentioned above, Mr Rone-Clarke's specialist role means that he is often the first to receive reports of and respond to the formation of unauthorised encampments. It would appear from his witness statement that the encampment on 13 May 2025 was responded to and resolved quickly, such that Council intervention was not needed (nor was there time for the same), and that the encampment between 24 March and 4 April 2025 was not problematic or causing harm, such that neither Mr Rone-Clarke or members of the public to report it to the Council. Therefore, whilst the

Council has now counted these encampments within their data, I have nothing further to add in relation to these encampments.

4 September 2025: Aldi, Weddington

55. I personally observed the encampment at this site on Thursday 4 September 2025 at approximately 4:55pm, but I am unsure as to the exact date and time at which the encampment formed on the land. I noted a horse drawn caravan with two horses on the path/grass verge adjacent to the public highway and next to the Aldi car park. I was driving at the time, and therefore did not take note of further details. Upon reaching my destination, I reported what I had seen to the Private Sector Housing Team. The site is not one of the 142 Injunction Sites. I am informed by the Private Sector Housing Team that Bilal Ismail (Technical Officer for Private Housing) attended the Aldi site on 5 September 2025 at around 11am. The encampment was still present, and I exhibit at **AP1/7** two photographs taken by Mr Ismail of the encampment, but I am informed that no welfare checks were carried out. Mr Ismail spoke to the Manager at Aldi and asked if the area belonged to Aldi. The Manager was going to speak with Head Office and call Mr Ismail. I am informed that no call was in fact received, and no information was provided about the behaviour of the encampment. Mr Ismail further attended the site on Saturday 6 November 2025 at around 11:00am, and observed that the encampment had moved on.

56. In the process of making this statement, and in making enquiries with Mr Ismail and the Private Sector Housing Team, it has come to my attention that the Council received a telephone call from a member of the public on 3 September 2025, in which it was reported that two caravans with horses were present on King Street in Bedworth. I am informed that Mr Ismail did not see that the call had been received until 4 September 2025 and, when he returned the call, he was advised that the caravans and horses had moved on. It seems likely that these were the same caravans and horses that attended the Aldi site on 4 September 2025. I have not counted this report as an encampment, as it is not clear when the caravans and horses arrived and how long they stayed for (they could have just parked up briefly to rest, and not stopped over, for example), and no other details are known.

THE CONTINUING NEED FOR INJUNCTIVE RELIEF

57. The Claimants' view is that there is a continuing need for the Injunction against Persons Unknown for two principal reasons:

- i. the Claimants apprehend that, if the Injunction was to expire and not be renewed, the frequency and duration of unauthorised encampments forming in the Borough, and especially on the sensitive Injunction Sites would increase, and significant harm would be suffered by the inhabitants of the Borough;
- ii. the alternative powers that are available to the Claimants to enforce against and manage the formation of unauthorised encampments are not as effective or efficient as the Injunction, and significant harm will be suffered by the inhabitants of the Borough if the Claimants were forced to rely on these powers exclusively (as they did before the grant of injunctive relief).

The need for relief against Persons Unknown

58. The Continuation Application relates only to the 54th Defendant, Persons Unknown. At this time, the Claimants have not identified any other person against whom it would be proportionate to seek injunctive relief. Only one of the three encampments since December 2024 has been formed by persons whose identity has become known to the Claimants; those persons had not previously been identified in the Borough, and have not since been identified in the Borough, and did not appear to be 'transiting' through the Borough in any event, but targeting a specific vacant commercial premises in pursuit of their well-established criminal enterprise.

59. The need for injunctive relief against Persons Unknown remains, as the nomadic way of life of the Gypsy and Traveller community means that there is a revolving cast of people passing through the Borough who may form encampments. As such, it is impossible for the Claimants to know who will in fact visit the Borough and form an encampment.

60. As I have also mentioned above (in the context of the power of arrest), when unauthorised encampments form, the Claimants are not always able to identify those who are present at

the encampment. It is common for members of encampments to decline to give their names and identification details, or they will sometimes give false or incomplete names, or nicknames. Most of the Named Defendants in the claim were identified by their association with a vehicle registration; however, that method of identification is also fraught with issues. Often the details held by the PNC and/or DVLA were incorrect or out of date, and many encampments were attended by vehicles with cloned number plates. Many Named Defendants had to be discontinued against because the identification data was unreliable.

61. Therefore, the Injunction against Persons Unknown must be renewed to ensure the effective protection of the rights of the inhabitants of the Borough.

Likelihood of further encampments

62. As set out above, the Injunction (and its predecessor orders) has been effective in reducing the frequency and duration of unauthorised encampments, especially on Injunction Sites. That said, three encampments did still form in 2025, which shows that the Borough is still attractive to unauthorised encampments. The Claimants apprehend that, if the Injunction were to expire and not be renewed, the number of unauthorised encampments would increase, as would the associated harms (such as fly-tipping, depositing of human waste and anti-social behaviour). It is not sustainable or acceptable for encampment numbers and associated harms to increase to pre-injunction levels, or anywhere close to that.

63. The data produced by Martin Rone-Clarke in his witness statement (which I have reviewed) supports the Claimants' apprehension. Neighbouring local authority areas, which do not have the benefit of injunctive relief, have reported much higher encampment numbers in 2024 as compared to the Borough. That shows that there clearly are unauthorised encampments that frequent the geographical area, and the Claimants apprehend that these encampments will migrate into the Borough and onto the Injunction Sites specifically should the Injunction not be renewed.

64. Mr Rone-Clarke's data also shows that neighbouring local authority areas have been experiencing fairly stable numbers of unauthorised encampments since 2020, with only a minor fluctuation. That suggests that the reduction in the numbers in the Borough is not being achieved by displacement to other local authority areas. The exception to that

observation the Rugby Borough, although Mr Rone-Clarke explains in his witness statement the particular circumstances in Rugby Borough that are giving rise to their increased numbers.

Alternative methods of enforcement and management

65. The powers available to the Claimants and the Police to enforce against and manage unauthorised encampments are ineffective and inefficient. The most notable of these powers are found in the Criminal Justice and Public Order Act 1994, s60C (introduced in 2022), s61 and ss77-78. These powers were used prior to the grant of injunctive relief, and are still used in circumstances where the Injunction does not apply.

66. The ineffectiveness of these powers is evidenced by the high encampment numbers and resulting harms that were suffered prior to the grant of injunctive relief.

Criminal Justice and Public Order Act 1994, ss77-78

67. The Claimants have the power to give a direction under s77 that persons residing in a vehicle or vehicles on highway land, unoccupied land or occupied land without the consent of the occupier must leave the land and remove the vehicle(s). Failure to comply with the direction is an offence, punishable by a fine. A s77 direction is effective for three months, and a person may not re-enter the land during that period. If a s77 direction is not complied with, the local authority may make a complaint to the Magistrates' Court, and an order for the removal of the person(s), vehicle(s) and any other property of the persons(s) can be obtained (per s78).

68. In practice, s77 is a very inefficient way of securing the removal of encampments, and encampments are often able to stay in situ for some time, and all of the harms associated with such encampments are still suffered. In particular, members of the Gypsy and Traveller community are often well-versed in the enforcement mechanisms available to local authorities. The Claimants' experience is that encampments will, once served with s77 directions, wait until the date of a Magistrates' Court hearing (or the date on which enforcement of a s78 order is due to take place), and then vacate the encampment site. By then, the Claimants have incurred the cost of issuing proceedings and run the matter up to

a hearing. Depending on how long it takes to secure a hearing in the Magistrates' Court and/or the resources to enforce an order, the encampment can remain in situ for days or weeks, and the harms that the Claimants are trying to prevent have time to occur.

69. Further weaknesses in the use of s77 include:

- i. directions are only effective for three months, after which time those persons directed to leave the land can re-enter, and fresh enforcement proceedings are required. Section 77 is not a mechanism which can secure medium to long-term protection for especially sensitive or vulnerable land;
- ii. directions (and order obtained under s78) relate only to a specific parcel of land. The Claimants' experience is that when issued with s77 directions, encampments often move only a very short distance away to a new parcel of land, necessitating fresh enforcement proceedings (and causing yet further cost to the Claimants). This often creates a 'cat-and-mouse' series of enforcement proceedings as encampments move from one site to the next.

70. When dealing with the 142 Injunction Sites, time is of the essence; the longer an encampment is allowed to remain in situ, the more chance there is that harms will be suffered. The Injunction enables encampments to be moved on to more appropriate sites swiftly and efficiently, and thus reduces (or even altogether prevents) harm being suffered by the inhabitants of the Borough and the Claimants.

71. Lastly, ss77-78 can be a costly and financially inefficient method of enforcement. Costs are incurred in the drafting of the necessary documents and court applications. That cost is on top of court fees, should an order need to be sought, as well as other disbursements such as counsel's fees. Repeating that cost for each encampment can quickly cause costs to accumulate. In contrast, once injunctive relief is secured, there are very few, if any, ongoing legal costs, as the enforcement is led by the Claimant's own enforcement officers with the assistance of Warwickshire Police.

Criminal Justice and Public Order Act 1994, s60C and s61

72. Warwickshire Police also have specific powers to deal with unauthorised encampments. In particular, if the conditions of s61 are met, police officers can direct person(s) trespassing on land (for the purpose of residing there) to leave the land and remove any vehicles or property that they have with them. The conditions for the use of this power mean that it is available when an encampment is large (six or more vehicles) or aggravated (damage, disruption or distress is being caused). Failure to comply with a s61 direction is an offence, punishable by a fine or a custodial sentence of up to three months. A section 61 direction is effective for 12 months.
73. The 1994 Act was amended by the Police, Crime, Sentencing and Courts Act 2022 to insert s60C (with effect from 28 June 2022), which creates the offence of residing on land without consent and with or in a vehicle, subject to the conditions set out therein. An offence under the provision is again an offence punishable by a fine or a custodial sentence of up to three months. This is the power that Warwickshire Police relied upon in relation to the encampment on 13 May 2025.
74. The police powers under s61 and s60C are not a viable alternative to the Injunction in the medium and long-term, and will not prevent (or reduce to a significant degree) the harms suffered by reason of unauthorised encampments. In particular, the powers are police-led, and rely on Warwickshire Police having the available resourcing to use and enforce those powers.
75. The Claimants' experience prior to the grant of injunctive relief that the Warwickshire Police cannot resource the use of those powers for every encampment that meets the conditions of the statutory provisions (or at least not in a swift enough manner to prevent harm being suffered). The reality is that the organisation has limited and finite resources, and cannot always prioritise responses to (and enforcement against) unauthorised encampments.
76. The power is also reactive and not proactive. It can only be relied upon once an unauthorised encampment has formed, and harms are being suffered. In contrast, the Injunction seeks to prevent harm to the most sensitive and vulnerable sites in the Borough.

Further, the penalties carried by s61 and s60C again rely on the Magistrates' Courts being able to accommodate hearings.

77. Therefore, the Injunction is especially important as the enforcement is Claimant-led and proactive. In the Claimants' experience it is the most efficient way to manage and move on unauthorised encampments from the 142 Injunction Sites to reduce or prevent any harm being caused.

Public space protection orders and byelaws

78. In *Wolverhampton* (in which the Claimants were successful respondents), The Supreme Court said that local authorities should consider whether using byelaws or public space protection orders ('PSPO') are a suitable alternative to injunctive relief.
79. The process of introducing a PSPO can be slow; there are statutory requirements relating to consultation, publicity and notification. Therefore, a PSPO cannot be implemented (or amended) swiftly to react to problematic conduct, unlike injunctive relief. For example, if various PSPOs were used to prohibit encampments, but a site outside of the PSPO area became a frequent target for harmful encampments, the Council would not be able to react with speed to bring that site within the protection of a PSPO; in contrast, an application for the variation of the Injunction, or standalone injunctive relief, can be made with speed to protect the site and prevent harm.
80. The enforcement of a PSPO may also not succeed in moving on an encampment that has formed; a Police officer or Council officer could issue a fine (by way of a fixed penalty notice) to the occupants of the encampment, but this would not ensure the encampment was moved on, meaning that any negative impact on the local community would remain. Only for persistent breaches of a PSPO, where multiple fixed penalty notices have been issued, will there be a summons to court. In that time, the harm of the encampment would have been suffered, and resources used in ineffective enforcement against the encampment. The enforcement of a PSPO contrasts with the Injunction, where encampments can and are moved on swiftly.

81. Lastly, a PSPO is punitive in nature, with fines or a prosecution the result of any contraventions. The Claimants do not seek to punish the Gypsy and Traveller community for their way of life, but simply restrict the areas of the Borough in which they can exercise their way of life and achieve a balance between their interests and the rights of the inhabitants of the Borough. Whilst the Injunction could be enforced by way of the use of the power of arrest or contempt proceedings, that would not result in a prosecution per se, and the way in which the Injunction has in fact been used in practise has been by educating those in breach and providing advice where possible.

82. Many of the reasons as to why PSPOs are unhelpful and inefficient for dealing with unauthorised encampments also apply to byelaws. Most notably, the enforcement of a byelaw does not include the power to move on an encampment, with a fixed penalty notice again being the primary method of enforcement. Further, a byelaw is again punitive in nature, with fines for breach.

STOPPING PROVISION IN THE BOROUGH

83. As is set out in the witness statement of Martin Rone-Clarke (which I have reviewed), the Borough does not operate a transit site, nor does the Council at this time have a formal adopted negotiated stopping policy (although it does operate the ‘Warwickshire Protocol 2025’ exhibited at **AP1/3** and the Council’s own documented procedure exhibited at **AP1/4**).

84. The Borough did not have a designated transit site when Cotter J granted the Injunction in December 2024, nor did it have a formally adopted negotiated stopping policy. The Judge nonetheless granted the Injunction and, when counsel raised the possibility that an undertaking to adopt a formal negotiated stopping policy could be given (as had been done in other similar matters), the Judge expressly said that he did not require the same.

85. As to the absence of a transit site, the Council respectfully says that this should not affect whether the Injunction is continued for a further year, especially in circumstances where:

- i. no transit site was in operation when the Injunction was granted;

- ii. the Claimants have a power, but not an obligation, to provide a transit site (Criminal Justice and Public Order Act 1994, s80 and the Caravan Sites and Control of Development Act 1960, s24);
- iii. a policy or procedure of negotiated stopping is a much more flexible approach to stopping and transit needs, and can better serve the needs of the Gypsy and Traveller community who may need to stop in a particular place for a short period (for example, to attend medical appointments), rather than directing them to a designated site which may not be suitably located for their needs.

Negotiated stopping policy

86. As explained above, the Council does not currently have a formally adopted negotiated stopping policy, but does practise a policy of toleration where appropriate (and specifically where compelling welfare needs require).

87. As Martin Rone-Clarke has explained in his witness statement, he has drafted a negotiated stopping policy with a view to it being adopted by all local authorities in Warwickshire, and his view is that the policy is ready to be adopted (subject to the finalisation of the appendices). I exhibit at **AP1/8** a copy of the policies (minus the appendices). The Council's Senior Leadership Team has approved the policy, and it will now be put before Cabinet for formal adoption; I expect that this will happen in December 2025 at the earliest, given the dates of the meetings and the work and process that is required to put the policy before Cabinet, but is more likely to be January 2026 (but will in any event happen within the next few months).

ENGAGEMENT WITH THE TRAVELLER COMMUNITY

88. Lastly, the Claimants are fortunate that its local police force, Warwickshire Police, has a specialist Gypsy and Traveller Liaison Officer (that being Martin Rone-Clarke) who encourages engagement between local authorities and public bodies and the Traveller Community. Whilst the Second Claimant is more active in assisting with the organising of engagement events than the Council, the Council does participate and attend such events wherever possible.

89. Since the grant of the Injunction in December 2024, the Council attended an event on 30 June 2025 at Warwickshire Police HQ Leek Wootton, Warwick CV35 7QA. Doreen Katusiime (Private Sector Housing Manager) attended in support of the event. The event was a conclusion of several events in the County to celebrate Gypsy Roma Traveller History Month. The day saw artwork on display created by primary schools across the County. It gave professionals the opportunity to engage with other professionals dealing with Gypsy Roma Travellers and to speak to Gypsies and Travellers attending the event to gain a better understand of culture and history.

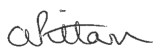
CONCLUSION

90. The Claimants seek a 12 month continuation to the Injunction in the form of the Draft Order. There is a continuing need for the Injunction, and the Claimants apprehend that, if the Injunction was to expire, the frequency, size and duration of unauthorised encampments forming on the 142 Injunction Sites would increase, with the harm being suffered by reason of those unauthorised encampments increasing commensurately.

STATEMENT OF TRUTH

I believe that the facts set out in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:



Amy Pittam

5th November 2025

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: QB-2019-000616

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP1'

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: QB-2019-000616

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP1/1'

Amended under the slip rule CPR 40.12 by The Honourable Mr Justice Cotter

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Before the Honourable Mr Justice Cotter

Claim No. QB-2019-000616



QB-2019-000616

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

ORDER

**IF YOU, ANY OF THE ABOVE DEFENDANTS (WHETHER NAMED OR NOT),
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 the Claimants' Claim seeking injunctive relief pursuant to the Local Government Act 1972, s222 and the Town and Country Planning Act 1990, s187B to restrain unauthorised encampments in the Borough of ~~Test Valley~~ Nuneaton and Bedworth.

AND UPON hearing Caroline Bolton and Natalie Pratt of counsel for the Claimants, and no Defendant appearing or being represented

AND UPON the Court being satisfied that the Defendants have been served with both the Claim Form and the notice of this hearing

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST FOR BREACH OF PARAGRAPHS 1(a) to 1(e) INCLUSIVE OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY PERSON FOUND TO HAVE BREACHED PARAGRAPHS 1(a) to 1(e) INCLUSIVE OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE A JUDGE OF THE HIGH COURT

Note to Arresting Officer: where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006:

- The defendant shall be brought before a Judge of the High Court within a period of 24 hours beginning at the time of their arrest. For the purposes of this requirement, a remote hearing will suffice;
- 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 shall authorise the detention of the defendant after the expiry of the period of 24 hours beginning at the time of their arrest.

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

IT IS ORDERED THAT:

A. INJUNCTION ORDER

1. Until and including **17 December 2029**, the 1st to 13th (inclusive), 15th to 17th (inclusive), 20th to 23rd (inclusive), 25th to 27th (inclusive), 29th to 33rd (inclusive), 35th, 38th, 39th, 41st and 42nd Defendants (as set out at Schedule 1 to this Order) (the '**Named Defendants**' hereafter)

And

Until and including **17 December 2025**, the 54th Defendant (Persons Unknown)

are **forbidden** from:

- a) Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority or the Secretary of State, or written consent from the Local Planning Authority or in accordance with statutory permitted development rights.
- b) Setting-up an encampment (as defined below) on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, save for where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).
- c) Setting-up an encampment (as defined below) on any part of the Land (as defined below) without Written Permission from the Local Planning Authority, or planning permission granted by the Secretary of State or in accordance with statutory permitted development rights.
- d) Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans/mobile homes other than when driving through the highways on the Land or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority or the Secretary of State, or with Written Permission from the Local Planning Authority or in accordance with statutory permitted development rights.
- e) Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.

Power of arrest

- 2. There shall be a power of arrest attached to prohibitions 1(a) to 1(e) (inclusive) of this Order.

Definitions

- 3. In this Order, the following definitions shall apply:
 - a) The '**Land**' means:

- i. For the Named Defendants, all land within the Borough of Nuneaton and Bedworth as marked with the red outline on the map attached at Schedule 2 to this Order;
 - ii. For the 54th Defendant (Persons Unknown), all the land marked on the maps at Schedule 3 to this Order and identified by the key to the map and list of sites, and numbered 1 to 142 on that list.
- b) **‘Encampment’** means the entering and/or occupying of any part of land for residential purposes (temporary or otherwise) with caravans/mobile homes.
 - c) **‘Controlled Waste’** has the same meaning as within s.75(4) of the Environmental Protection Act 1990.
 - d) **‘Written Permission from the Local Planning Authority’** includes, but is not limited to, written permission granted pursuant to any negotiated stopping agreement, policy or procedure.

B. SERVICE

4. Pursuant to CPR 6.26 and 6.27, the Claimants are permitted to serve this Order on the Named Defendants by way of first-class post to the last known address of the Defendant. Service shall be deemed to have been effected on the second business day after the posting.
5. Pursuant to CPR 6.26 and 6.27, this Order shall be deemed served on the 54th Defendant (Persons Unknown) on the date when a copy of this Order (as opposed to an original) is affixed as a laminated copy or in a transparent envelope in a prominent position on all 142 sites defined as the Land in paragraph 3(a)(ii) above.

C. LIBERTY TO APPLY

6. The Defendants or anyone notified of this Order may each of them apply to the Court on 72 hours prior written notice (without prejudice to the right of that person to apply to abridge time for service) to both the Court and the Claimants to vary or discharge this Order (or so much of it as affects that person). The contact details for both the Court and the Claimants can be found in paragraphs 19 and 20 below.

D. REVIEW OF THE ORDER AGAINST THE 54th DEFENDANT (PERSONS UNKNOWN)

7. The Order against the 54th Defendant (Persons Unknown) will expire by the effluxion of time on 00:00hrs on **18 December 2025**. The Claimants may, if so advised, apply for the renewal of the Order against the 54th Defendant (Persons Unknown) (the **‘Renewal Application’**). Any Renewal Application and evidence in support must be filed and served in accordance with paragraph 5 above by 4pm on **6 November 2025**.

8. A hearing shall be listed on **3 December 2025**, with a time estimate of 1 day, at which the Renewal Application shall be considered. If the Claimants do not make a Renewal Application, they must notify the Court as soon as reasonably practicable and seek to vacate the hearing.
9. Any person other than the Claimants who would like to participate in the hearing of the Renewal Application must also file and serve on the Claimants any evidence upon

which they intend to rely at the hearing of the Renewal Application by 4pm on **19 November 2025**.

E. COSTS

10. The Named Defendants shall pay the Claimants' costs of the Claim on the standard basis to be assessed if not agreed. The time by which detailed assessment must be commenced is to be extended to the date of the review hearing, as set out in paragraph 8 above.
11. The Named Defendants shall each make a payment on account of costs to the Claimants in the sum of £2,817 by 4pm on 31st December 2024, the said sum being an assessment of a reasonable sum on account of costs.
12. No order as to costs against the 54th Defendant.

GUIDANCE NOTES

EFFECT OF THIS ORDER

13. A Defendant who is an individual who is ordered not to do something must not do it himself/herself/themselves or in any other way. He must not do it through others acting on his behalf or his/her/their instructions or with his/her/their encouragement.
14. 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

15. 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

16. In this Order, where there is more than one Defendant, unless otherwise stated, references to “the Defendants” means each or all of them.
17. 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.
18. An Order requiring the Defendants to do or not to do anything applies to all Defendants.

COMMUNICATIONS WITH THE COURT

19. All communication to the Court about this order should be sent to Kings Bench Listing, Royal Courts of Justice, Strand, London, WC2A 2LL. The telephone number is 0203 936 8957. The offices are open between 10am and 4pm Monday to Friday. The email address is kbjudgeslistingoffice@justice.gov.uk.
20. All communication to the Claimants about this Order should be sent to Legal Services, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton CV11 5AA. The telephone number is 024 7637 6476, the email address in legal.admin@nuneatonandbedworth.gov.uk.

Order Dated 17 December 2024

SCHEDULE 1 – LIST OF NAMED DEFENDANTS

List of Defendants and their addresses

- (1) THOMAS CORCORAN – Plot 10 Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (2) JESSICA DODDS, Plot 10, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (3) MICHAEL DOYLE, 6 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (4) LUKE DELANEY, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (5) PATRICK MCGINLEY, Barn Fisheries, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (6) ALPHONSUS MCGINLEY, 7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (7) MICHAEL STOKES, 29 Oaktree Field Caravan Site, Odstock Road, Salisbury, Wiltshire SP2 8BY
- (8) MICHAEL STOKES, 6 Horsdean Travelers Site, Braypool Lane, Patcham Brighton, East Sussex BN1 8PP
- (9) DENNIS STOKES, Plot 6 Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
- (10) DENNIS STOKES (JNR), Caravan 6 Dun Roamin Park, Whitfield, NN13 5TD
- (11) BRIAN STOKES, 12a, Orchard Drive, Smithy Fen, Cottenham, Cambridgeshire, CB24 8PT
- (12) JOHN MAUGHAN, 14 Long Green, Cressing, Braintree, Essex, CM77 8DL
- (13) TERRY MAUGHAN, 70 Exton Avenue, Luton, Bedfordshire, LU2 0LJ
- (14) ~~TERRY MAUGHAN, 10 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~
- (15) PATRICK MAUGHAN, 12 Bashley Road Caravan Site, Bashley Road, London, NW10 6TH
- (16) OWEN MAUGHAN, 7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (17) OWEN MAUGHAN, 8 Imari Park, 38 Russell Street, Derby DE24 8AL
- (18) ~~BERNARD CORCORAN, No Fixed Abode~~
- (19) ~~FRANCIS CORCORAN, No Fixed Abode~~
- (20) FRANCIS MAUGHAN, 14 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (21) MARTIN MAUGHAN, 81 Constitution Road, Chatham, Kent, ME5 7DN
- (22) THOMAS MAUGHAN, 11 Kanes Hill Caravan Site, Botley Road, Southampton, SO19 0SA
- (23) JOHN MONGAN, 1 Gapton Hall Road, Great Yarmouth, Norfolk, NR31 0NL
- (24) ~~MARTIN MONGAN, 14 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL~~

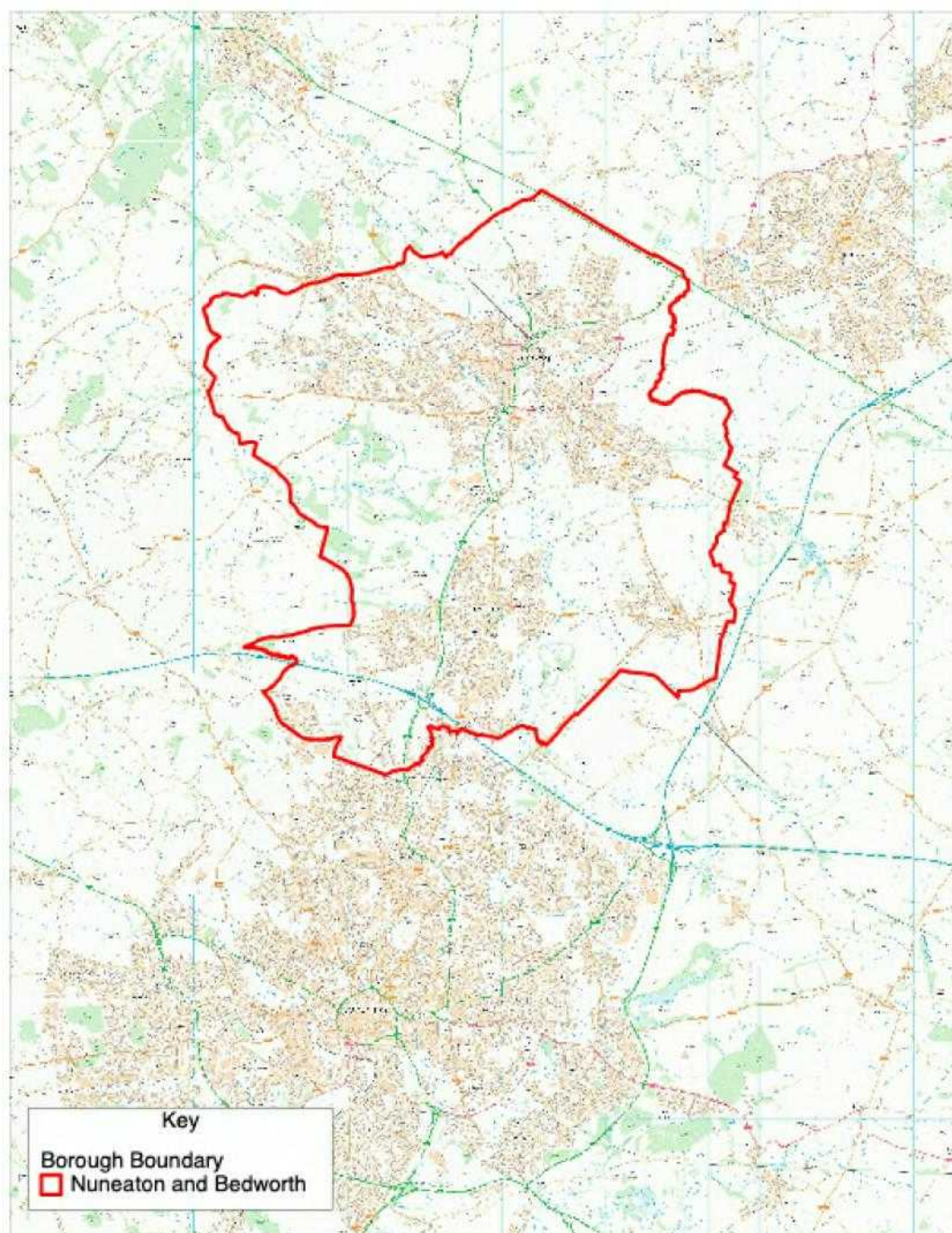
- (25) MARTIN MONGAN, 9 Limehouses, Boathorse Road, Stoke-On-Trent, Staffs ST6 4QQ
- (26) LEONARD MONGAN, 8 Pendles Paddock, Marlow Road, Stokenchurch, High Wycombe, Bucks, HP14 3UW
- (27) PAUL McDONAGH, 9 Russell Street, Derby
- ~~(28) SIMON McDONAUGH, 3 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~
- (29) BERNARD McDONAGH, 37 Boathorse Road, Stoke-On-Trent, Staffordshire, ST7 4JA
- (30) JOHN McDONAGH, Caravan 7 Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD
- (31) MIKE McDONAGH, 62 De Laly Street, Ashton-On-Ribble, Preston, Lancashire, PR2 2DD
- (32) MARTIN McDONAGH, 29 Speyside Court, Orton, Southgate, Peterborough, PE2 6SN
- (33) AARON McDONAGH, 9 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- ~~(34) KATHLEEN McDONAUGH, 3 Orchard View, Horseman Side, Brentwood, Essex, CM14 5SU~~
- (35) WINNIE McDONAUGH, Caravan 14, Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD
- ~~(36) MARTIN WARD, 73 Mullacreevie Park, Armagh, BT60 4BB~~
- ~~(37) PAT WARD, 333 Mullacreevie Park, Armagh, BT60 4BB~~
- (38) MICHAEL WARD, Splashes, Castle Acre Road, Swaffham, Norfolk, PE37 7XE
- (39) KATHLEEN WARD, 2 Imari Park, 38 Russell Street, Derby DE24 8AL
- ~~(40) ROSELEEN WARD, 6 St Agnells Lane, Hemel Hempstead, Herts, HP2 7AX~~
- (41) BERNIE SWEENEY, Kanes Hill Caravan Park, 11 Botley Road, Southampton, SO19 USA
- (42) JOHN CONNORS, 2 Costalot Stables, Heath Road, Leicestershire, LE67 1DG
- ~~(43) TRACEY BROWN, 72 Lower Ecton, Ecton Lane Caravan Site, Northants NN3 5HQ~~
- ~~(44) WILLIAM BRIDGES, 16 Ling Croft, Brough, North Humberside, HU15 1TU~~
- ~~(45) TOM WARD, No Fixed Abode~~
- ~~(46) EDDIE McDONAUGH, No Fixed Abode~~
- ~~(47) EDDIE (AKA EDWARD) WARD, No Fixed Abode~~
- ~~(48) CHRISTOPHER McDONAUGH, No Fixed Abode~~
- ~~(49) WILLIAM DOHERTY, No Fixed Abode~~
- ~~(50) GERRY O'BRIEN, No Fixed Abode~~
- ~~(51) ELIZABETH O'BRIEN, No Fixed Abode~~
- ~~(52) PEARL BLAINLEY, No Fixed Abode~~

~~(53) — FIONA WARD, No Fixed Abode~~

(54) PERSONS UNKNOWN forming unauthorised encampments within the Borough of Nuneaton and Bedworth

SCHEDULE 2 – MAP OF THE BOROUGH

Nuneaton and Bedworth Borough Boundary

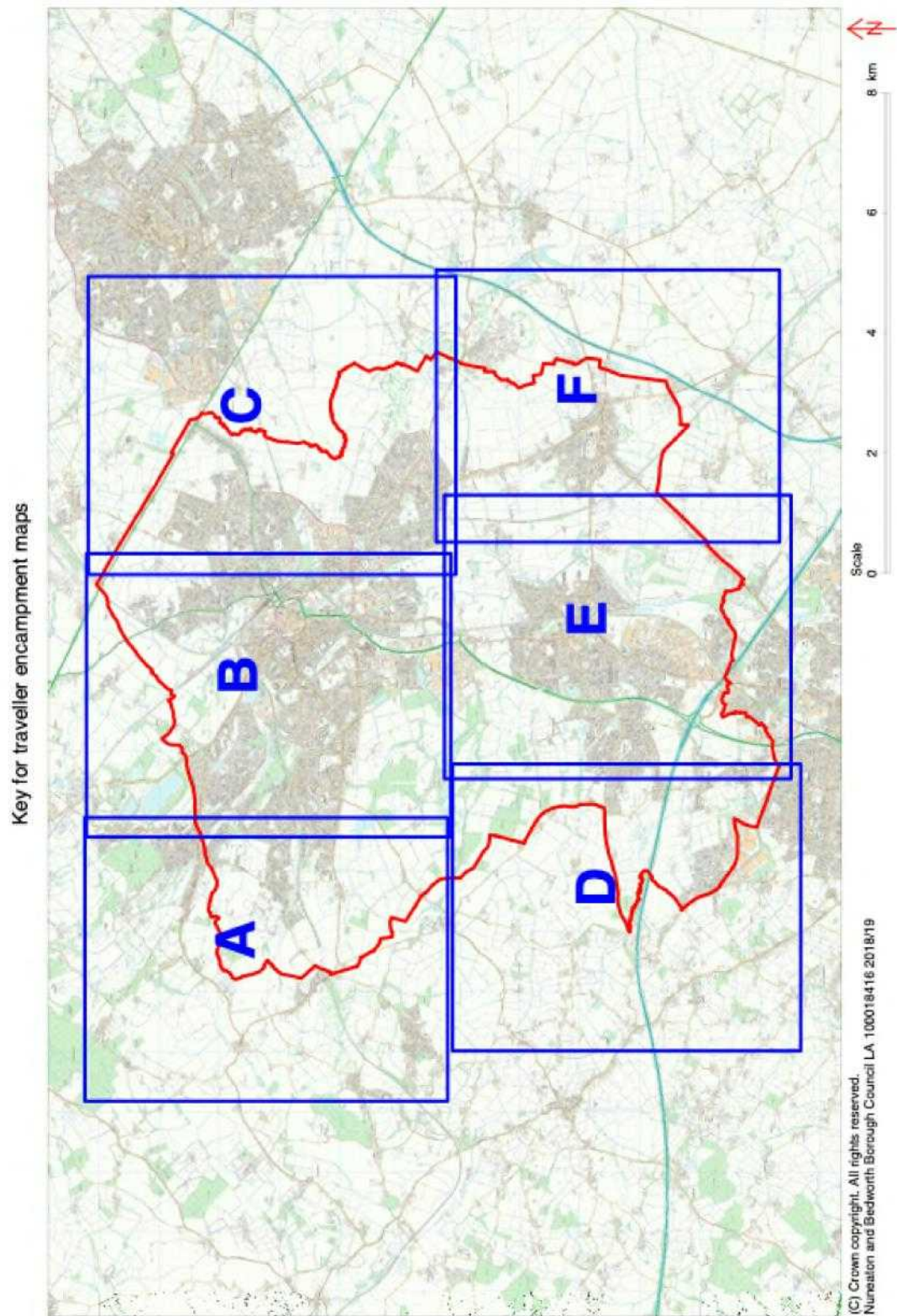


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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Not to scale



SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN



A

Northwest Nuneaton



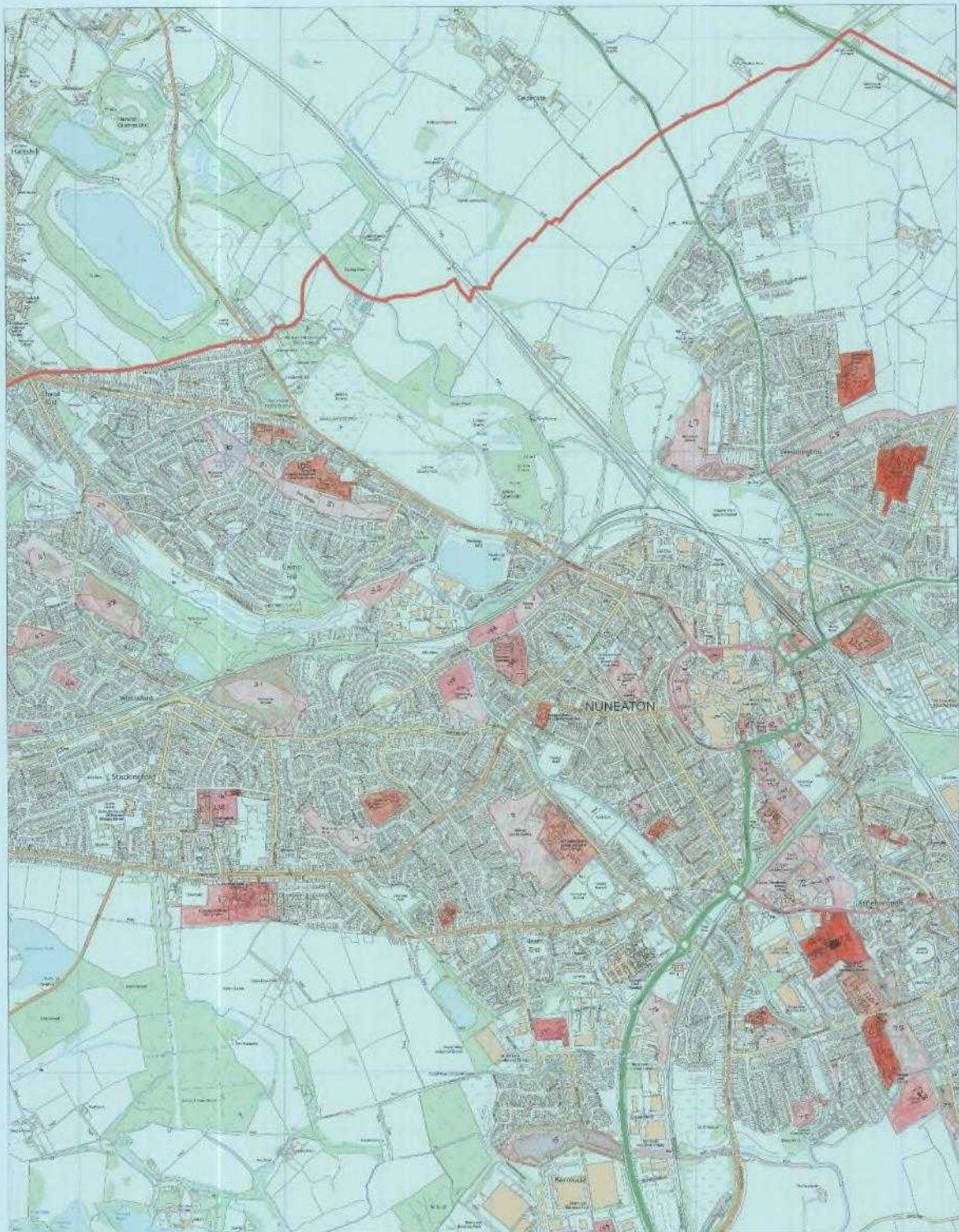
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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Scale
0 250 500 750 1000 m



B

North of Nuneaton



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100018416 2018/19

Scale
0 250 500 750 1000 m



C

Northeast Nuneaton



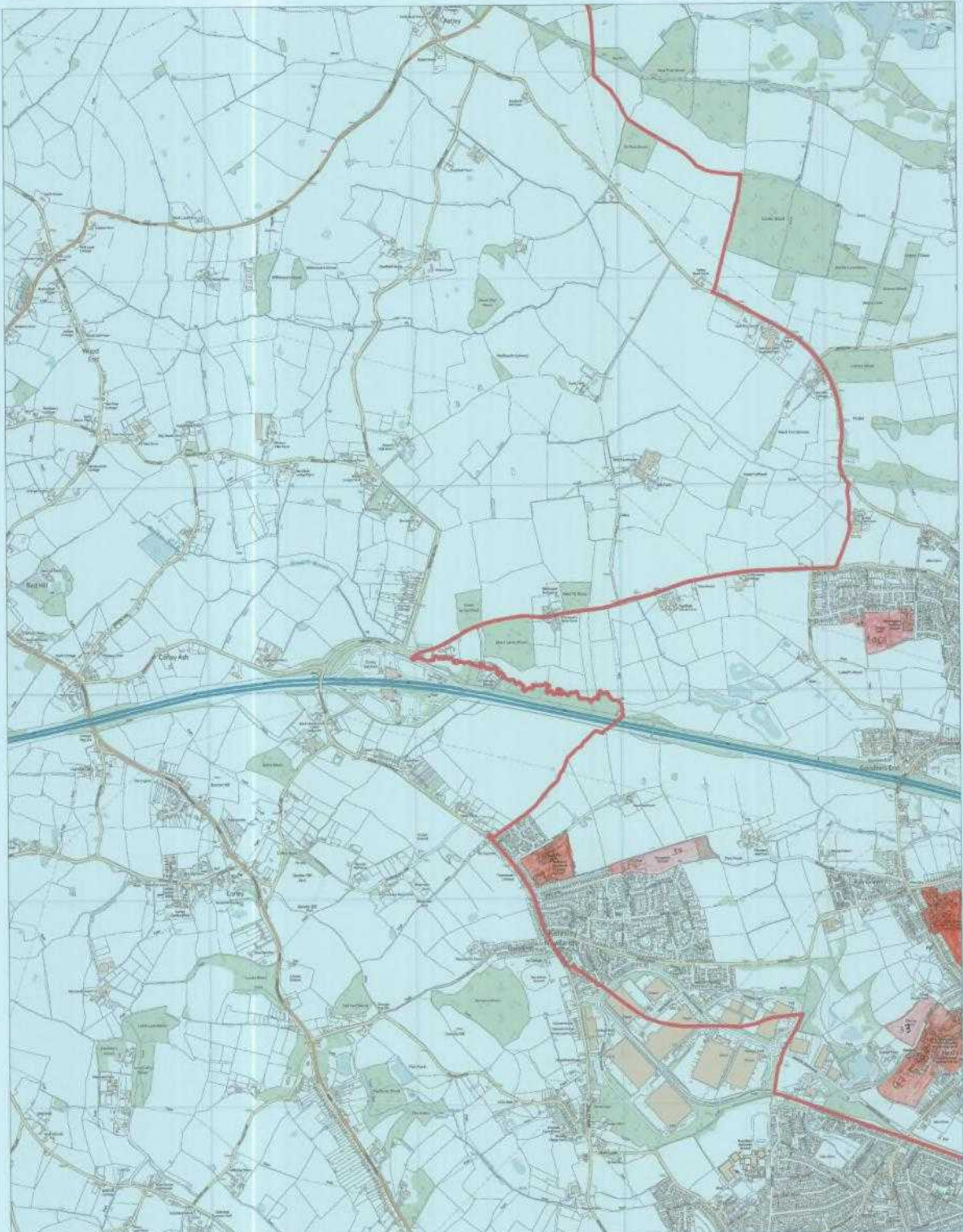
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100018416 2018/19

Scale
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D

Southwest Bedworth

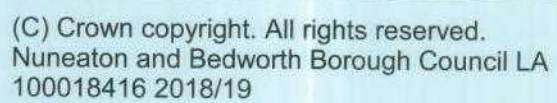


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Scale
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South of Bedworth

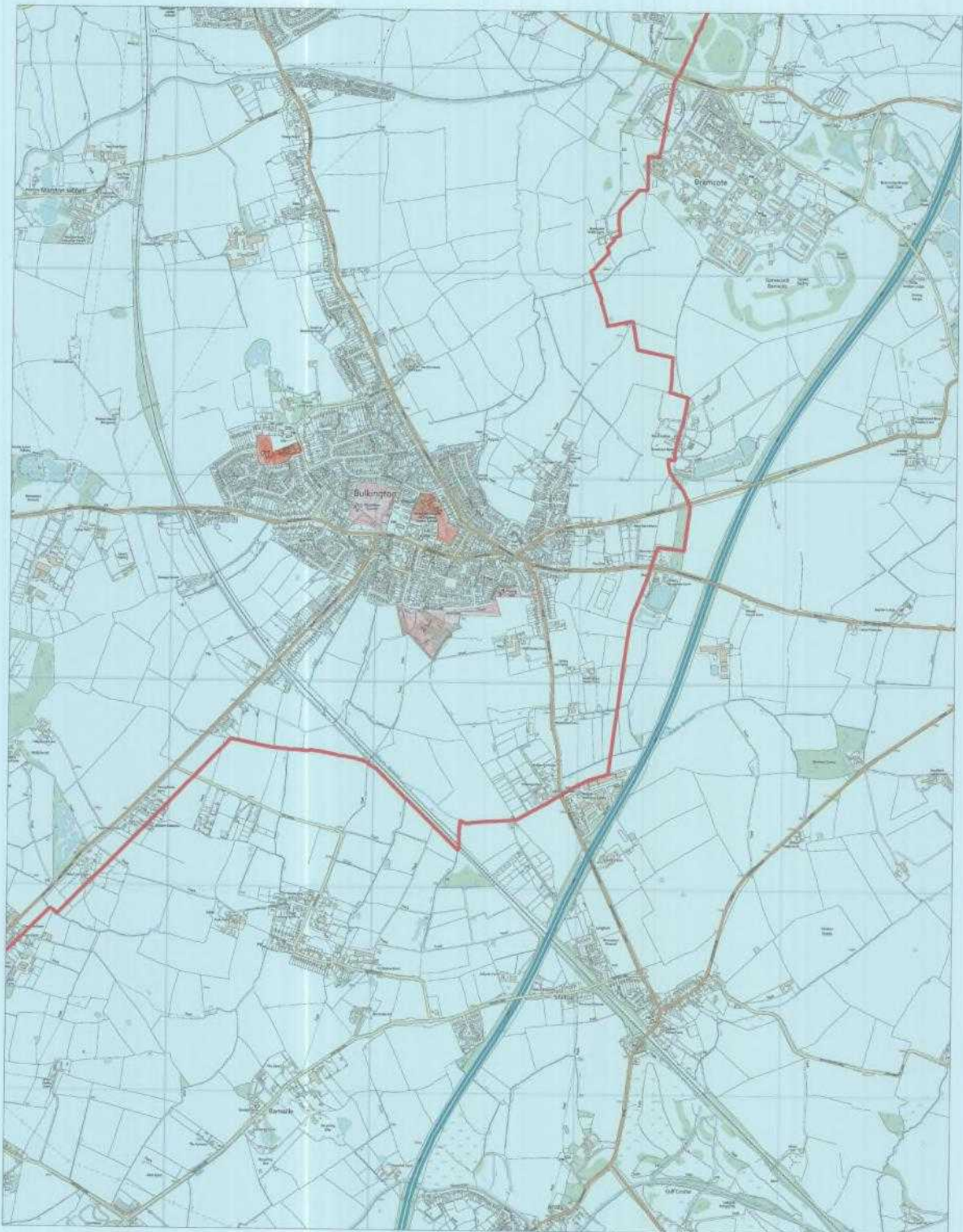


Scale
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F

Southeast Bedworth



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100018416 2018/19

Scale
0 250 500 750 1000 m



| SITE NUMBER | MAP SITE APPEARS ON | SITE | >5 acres | POSTCODE | Land Owner | Title Number |
|-------------|---------------------|--|----------|----------|------------|------------------------------------|
| 1 | B | Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS) | x | | NBBC | WK447699 |
| 2 | B | Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground/Pool Bank St) | ✓ | CV11 5PZ | NBBC | WK446269 |
| 3 | B | Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton (aka Stanley Road/Vernons Lane Recreational Ground) | ✓ | CV11 5ET | NBBC | WK447951/ WK240764/ WK236363 |
| 4 | B | Land being car park on the south west side of Corporation Street, Nuneaton (aka Upper Abbey Street Car Park) | x | CV11 5DG | NBBC | WK449599 |
| 5 | B | Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street Car Park 1 and 2) | x | CV11 5QE | NBBC | WK449585/ WK178804 |
| 6 | B | Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2) | x | CV11 4BW | Private | WK398436 |
| 7 | B | Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park) | x | CV11 5DB | NBBC | WK450184 |
| 8 | B | Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park) | x | CV11 4BS | Private | WK366584 |
| 9 | B | Land and buildings on the east side of Broad Street, the north side of Queen's Road and the south west side of Abbey Street (aka Abbey Street Car Park) | x | CV11 5NE | NBBC | WK251517 |
| 10 | B | Land at Church Street, Nuneaton (aka Church Street Car Park) | x | CV11 4AS | NBBC | WK449976 |
| 11 | B | Land and buildings lying to the East of Coton Road (aka Town Hall Car Park) | x | CV11 5AA | NBBC | WK88582 |
| 12 | B | Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park) | x | CV11 4AL | NBBC | WK426642 |
| 13 | B | Land at Coton Road, Nuneaton (aka Riverside Car Park) | x | CV11 5AA | NBBC | WK450296 |
| 14 | B | Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park) | x | CV11 5JF | NBBC | WK448678 |
| 15 | B | Land to the south side of Bermuda/land lying to the east and west of Coventry Road, Chilvers Coton/land on the west side of a road leading from Coventry to Nuneaton and a balancing lake and land to the south of Bermuda Road, Nuneaton (aka Bermuda Balancing Lake) | ✓ | | NBBC | WK446511/ WK284250/ WK345891 |
| 16 | C | Recreation Ground at Easyboro Way, Nuneaton (aka Attleborough Recreational Ground) | ✓ | CV11 4PY | NBBC | WK449338 |
| 17 | C | Land on south side of Lutterworth Road, Nuneaton (aka Pauls Land) | ✓ | CV11 6QA | NBBC | WK449027 |
| 18 | B | Land lying to the north east of Braemer Way, Nuneaton, Land on the south west and north east sides of Greenmoor Road & Land lying to the south east side of croft road (aka Jubilee Sports Centre) | ✓ | CV10 7EL | NBBC | WK48784/ WK448021/ WK448237 (part) |
| 19 | B | Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton (aka Marsdale Drive) | ✓ | | NBBC | WK342561/ WK355952 |
| 20 | B | Land at Recreation Ground, Tomkinson Road, Nuneaton | ✓ | CV10 8DS | NBBC | WK447355 |
| 21 | B | Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road (aka Whittleford Park) | ✓ | CV10 8PY | NBBC | WK130458/ WK447033 |
| 22 | E | Land on the south side of Marston Lane, Nuneaton (aka Bailey Park) | ✓ | CV12 8DR | NBBC | WK448160 |
| 23 | E | Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground) | ✓ | | NBBC | WK448256 |
| 24 | E | Spitalfields 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the north-west side of Rye Piece Ringway, Bedworth & Zion Chaple, High Street Bedworth | x | CV12 8NF | NBBC | WK448876/ WK246825/ WK448601 |

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|----|-----|---|---|----------|---------|--|
| 25 | E | Park Road (Car Park) - land on the east side of Park Road, Bedworth | x | CV12 8LH | NBBC | WK448511 |
| 26 | F | Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barnacle Lane, Bulkington, Bedworth | ✓ | | NBBC | WK448611/ WK448624(part) |
| 27 | F | Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth | x | CV12 9RF | NBBC | WK448510/ WK448500 |
| 28 | F | Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ) | ✓ | CV12 9LT | NBBC | WK449849 |
| 29 | B | Land on the south west side of Queen Elizabeth Road, Nuneaton | ✓ | CV10 9DA | NBBC | WK439320 |
| 30 | B | Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden Avenue, Nuneaton (aka Stubbs Pool) | ✓ | CV10 9DJ | NBBC | WK448197/ WK448093 |
| 31 | B | Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton (aka The Dingle) | ✓ | CV10 9DE | NBBC | WK373679/ WK448013 |
| 32 | B | Land on the south side of Willow Road, Nuneaton | ✓ | | NBBC | WK447731 |
| 33 | D | Land on the West side of Blackberry Lane, Bedworth | ✓ | | NBBC | WK137139 |
| 34 | E | Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry | ✓ | CV7 9EX | NBBC | WK450050 |
| 35 | D | Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedworth | ✓ | CV7 8NG | NBBC | WK124031 |
| 36 | E | Land lying to the North West of Rowley's Green Lane, Exhall, Coventry (aka Silverstone Drive) | ✓ | | NBBC | WK336223 |
| 37 | E | St. Giles Recreational Ground - Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall | x | CV7 9GZ | NBBC | WK143991/ WK154857 |
| 38 | B | Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Marl.) | ✓ | CV10 9TD | NBBC | WK358453 |
| 39 | A | Land south-east of Hickman Road, Galley Common, Nuneaton (aka Chaucer Drive) | ✓ | CV10 9SD | NBBC | WK339730 |
| 40 | A | Nuneaton & North Warks Group Riding for Disabled, Valley Road, Galley Common (CV10 9NJ) / land at Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NJ) (aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre) | x | CV10 9PZ | NBBC | WK447381/ WK439120/ WK244039/ WK238145 |
| 41 | B/A | Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the north east side of Merlin Avenue, south east side of Freesland Rise, Whittleford and land lying to the West of Bucks Hill (aka Freesland Rise) | ✓ | CV10 9QF | NBBC | WK319146/ WK326554 |
| 42 | B/A | Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Fernsham Drive/Poplar Tree Farm EA) | ✓ | ~ | NBBC | WK319145 |
| 43 | A | Land on Galley Common, Nuneaton; land at Galley Common Nuneaton and Land on the south side of Plough Hill Road, Stockingford (aka North Field) | ✓ | CV10 9PZ | NBBC | WK238447/ WK238145/ WK324522 |
| 44 | B | Land on the south side of Sherbourne Avenue, Nuneaton | x | CV10 9JH | NBBC | WK234444 |
| 45 | D | Land on the south side of Cardigan Road, Bedworth (aka Anderton Road POS) | ✓ | CV12 0HD | NBBC | WK281821 |
| 46 | E | Land and Buildings at Market End Farm and Orchard Farm, Smorrall Lane | ✓ | CV12 0GE | Private | WK380708 |
| 47 | E | Newdigate Recreational Ground - Land at Smorrall Lane, Bedworth | ✓ | CV12 0JP | NBBC | WK449987 |
| 48 | A | Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thorntons Way) | ✓ | CV10 8NN | NBBC | WK32497 |
| 49 | A | Kingswood Road Recreational Ground - Land on the North side of Ansley Road, Stockingford | x | CV10 9QG | NBBC | WK32497 |
| 50 | B | Stockingford Recreational Ground - Land on the west side of Westbury Road, Nuneaton and land on the north-east side of Grove Road, Nuneaton and land lying to the west of Nuneaton Road | ✓ | CV10 8JX | NBBC | WK448137/ WK448304/ WK317827 |
| 51 | E | Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth | ✓ | CV12 8NW | NBBC | WK449032 |
| 52 | E | Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way) | x | CV6 6TE | Private | WK394575 |
| 53 | E | Land on the North side of Bulkington Road and land on the South side of Johnson Road/Alex Wilson Centre, 34 Nuneaton Road, Bedworth (CV12 8AL) and land lying to the west of Wootton Street and land at Elizabeth Centre, Johnson Road | ✓ | CV12 9BH | NBBC | WK169700/ WK448169/ WK250992/ WK448429 |
| 54 | E | Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth | ✓ | CV12 8JT | NBBC | WK449032 |
| 55 | E | Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth | x | CV12 8NN | NBBC | WK449032 |
| 56 | E | Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth | x | CV12 8JT | NBBC | WK449032 |

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| 57 | E | Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth | x | CV12 8JG | NBBC | WK366034 |
| 58 | E | Land at Arbury Avenue, Bedworth (aka Arbury Road POS) | x | | NBBC | WK448598 |
| 59 | E | Collycroft Recreational Ground - Land lying to the east of Amos Jacques Road, Collycroft, Bedworth and land to the west of Nuneaton Road/Alex Wilson Centre 34 Nuneaton Road Bedworth and land to the west of Nuneaton Road | ✓ | | NBBC | WK295888/ WK460024/ WK448169/ WK317827 |
| 60 | E | Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road) | x | CV12 0AL | NBBC | WK449846 |
| 61 | C | Land lying to the north of Buttermere Avenue, Nuneaton | ✓ | CV11 6EP | NBBC | WK210986 |
| 62 | C | Land at Horselton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton | x | | NBBC | WK336798/ WK344607 |
| 63 | C | Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way | x | CV11 6YB | NBBC | WK447654/ WK319282 |
| 64 | C | Recreation Ground, The Long Shoot, Nuneaton, (CV11 6JH) | x | CV11 6JH | NBBC | WK446886 |
| 65 | C | Land at Horselton Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Drive/Tavistock Way) | ✓ | CV11 6YL | NBBC | WK336798/ WK447654 |
| 66 | C | Land on the east side of Changebrook Close and land on the west and east side of Pallett Drive, Nuneaton | ✓ | ~ | NBBC | WK345480/ WK309853 |
| 67 | B | Land on the south side of Church Lane, Nuneaton (Cleaver Gardens/Sandon Fields) | ✓ | CV10 0HG | NBBC | WK448958 |
| 68 | B | Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue, Nuneaton (aka Coronation Walk) | ✓ | CV10 0BN | NBBC | WK448096/ WK448091 |
| 69 | B | Land at Bradestone Road, Nuneaton | x | | NBBC | WK450499 |
| 70 | B | Land on the north side of Donnithorne Avenue, Nuneaton (aka Caldwell Grange) | x | | NBBC | WK452385 |
| 71 | B | Land on the south side of Avenue Road, Nuneaton (aka Gala Fields) | ✓ | | NBBC | WK452276 |
| 72 | B | Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground) | ✓ | | NBBC | WK448965 |
| 73 | B | Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton | x | | NBBC | WK449842/ WK449819 |
| 74 | B | Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton | x | CV11 5PQ | NBBC | WK447475 |
| 75 | B | Land at Donnithorne Avenue, Nuneaton; land lying to the east of Raveloe Drive, Nuneaton; land on the east side of Marston Lane, Nuneaton and Land on the east and west sides of Marston Lane, Nuneaton (aka Marston Lane Fields) | ✓ | CV11 4RE | NBBC | WK452370/ WK452349/ WK449466/ WK449734 |
| 76 | B | Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chilvers Coton | ✓ | CV10 7BX | NBBC | WK448537/ WK344972 |
| 77 | B | Riversley Park, Coton Road, Nuneaton | ✓ | CV11 5TY | NBBC | WK450206/ WK450173 |
| 78 | B | Land at Sorrell Road, Nuneaton | ✓ | CV10 7AW | NBBC | WK450035 |
| 79 | B | Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton | x | CV11 5TX | NBBC | WK450206/ WK450173 |
| 80 | B | Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park) | ✓ | CV11 4LX | NBBC | WK448965 |
| 81 | C | Crowhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton | ✓ | CV11 6XA | NBBC | WK370915 |
| 82 | B | Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton | x | CV11 4PW | NBBC | WK310067 |
| 83 | E | Land at Acacia Crescent, Bedworth | x | | NBBC | WK448428 |
| 84 | B | Land at Dunns Close, Nuneaton | x | | NBBC | WK452330 |
| 85 | E | Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry) | x | | Private | WK394575 |
| 86 | C | Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton | x | | WCC | WK271645/ WK455358 |
| 87 | E | Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA) | ✓ | CV12 9EA | WCC | WK470015/WK424958 |
| 88 | D/E | Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH) | ✓ | CV7 9AH | Private | WK463626 |
| 89 | E | Race Leys Infant School, Bedworth | x | CV12 8AD | WCC | Unregistered |
| 90 | E | Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP) | ✓ | CV12 0HP | WCC | WK424335 |
| 91 | E | All Saints Bedworth C of E Primary School and Nursery, Bedworth | x | CV12 9HP | WCC | Unregistered |

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|-----|-----|--|---|----------|--------------|-------------------|
| 92 | F | Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth | x | CV12 9RT | WCC | WK79471 |
| 93 | E | The Cannons C of E Primary School - aka Land and buildings on the South side of Derwent Road, Bedworth | ✓ | CV12 8RT | Private | WK225063 |
| 94 | E | Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth | x | CV7 9FJ | WCC | WK33092 |
| 95 | D | Keresley Newland Primary Academy and Keresley Newland School, , Grove Lane, Keresley, Coventry, (CV7 8JZ) | ✓ | CV7 8JZ | WCC | WK427632/WK477207 |
| 96 | D | Newdigate Primary School and Nursery - aka Land lying to the South of Smorral Lane, Goodyears End, Bedworth and Land lying to the South of smorral Lane Bedworth | ✓ | CV12 0HA | WCC | WK27604/WK134659 |
| 97 | D/E | Wheelwright Lane Primary School, Ash Green, Coventry | ✓ | CV7 9HN | WCC | WK425267 |
| 98 | E | St Francis Roman Catholic School, Nicholas Street, Bedworth | x | CV12 8JN | Private | WK262596 |
| " | | Land lying to the North of Rye Piece Ringway, Bedworth | | | Private | WK476476 |
| " | | Land on the East Side of Nicholas Street, Bedworth | | | WCC | WK171388 |
| 99 | E | St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth | ✓ | CV7 9NS | WCC | WK171647 |
| 100 | F | St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF) | ✓ | CV12 9PF | Private | WK461720 |
| " | | Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth, CV12 9PF | | | Private | WK472707 |
| 101 | E | St Michael' s Primary School, Hazel Grove, Bedworth, (CV12 9DA) | ✓ | CV12 9DA | Private | WK479304 |
| 102 | B | Land adjoining St Thomas More Catholic School and Sixth Form College, Greenmoor Road, Nuneaton, CV10 7EX | ✓ | CV10 7EX | Private | WK478035 |
| " | | St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX | | | Private | WK477630 |
| " | | Arbury High School, Greenmoor Road, Nuneaton | | | Private | WK233418 |
| 103 | B | Abbey Cof E Infant School, Nuneaton | x | CV11 5EL | WCC | Unregistered |
| 104 | B | All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT) | x | CV10 7AT | Private | WK461748 |
| 105 | B | Camp Hill Primary School, aka Land to the South of Tuttle Hill, Camp Hill, Nuneaton | ✓ | CV10 9QA | WCC | WK409218 |
| 106 | C | Chetwynd Junior School, aka Land lying to the South of Gipsy Lane, Nuneaton | ✓ | CV11 4SE | WCC | WK170501 |
| 107 | B | Land at Judkins Quarry Tuttle Hill, Nuneaton (aka Recycling Centre) | ✓ | CV10 0HU | WCC | WK393091 |
| 108 | B | Chilvers Coton Community Infant School, Frank Street, Nuneaton (CV11 5RB) | x | CV11 5RB | WCC | WK424955 |
| 109 | B | Croft Junior School, aka Land lying to the west of Northumberland Avenue, Nuneaton | ✓ | CV10 8ER | WCC | WK239413 |
| 110 | B | Galley Common Infant School, Nuneaton | x | CV10 9NZ | WCC | Unregistered |
| 111 | C | Milby Primary School, aka Land lying to the East of Higham Lane, Nuneaton | ✓ | CV11 6JS | WCC | WK205172 |
| 112 | B | Glendale Infant School, aka Land on the south side of Skye Close, Nuneaton | x | CV10 7LW | WCC | WK178493 |
| 113 | B | Middlemarch School, Nuneaton | ✓ | CV10 7BQ | WCC | Unregistered |
| 114 | B | Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY) | x | CV10 8HW | WCC | WK426673 |
| " | | Land and buildings on the south side of St Paul's Road, Nuneaton | | | WCC | WK380085 |
| 115 | B | Our Lady of the Angels Infant School and St Josephs RC First School at Coton Road, Nuneaton | x | CV11 5TY | Private | WK226511 |
| " | | Our Lady of the Angels Infant School and St Josephs RC First School, Coton Road, Nuneaton, CV11 5TY | | | Private | WK477543 |
| 116 | A | Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton | ✓ | CV10 8NL | Private | WK470637 |
| " | | Land on the North Side of Ansley Road, Nuneaton | | | Private | WK189736 |
| 117 | B | Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR | | | Private | WK471379 |
| 118 | B | St Pauls C of E Primary School, Nuneaton | x | CV10 8NH | Unregistered | |
| 119 | B | Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton | x | CV10 0JX | Private | WK480568 |
| " | | St. Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX | | | Private | WK449953 |
| 120 | B | Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH | x | CV11 4QH | Private | WK468047 |

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|-----|---|--|---|----------|---------|----------------------------|
| | " | Oakwood Secondary School, Morris Drive, Nuneaton | | | Private | WK468048 |
| | " | Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH | | | WCC | WK233776 |
| 121 | C | Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 6HJ | x | CV11 6HJ | WCC | WK473130 |
| | " | Land on the East Side of Windemere Avenue, Nuneaton | | | Private | WK131856 |
| | " | St Nicolas C of E First School, Windemere Avenue, Nuneaton, CV11 6HJ | | | Private | WK473119 |
| 122 | B | Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton | ✓ | CV10 0DR | WCC | WK149023/WK216447 |
| 123 | B | Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP | ✓ | CV11 4QP | Private | WK458966 |
| 124 | B | Wembrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton | ✓ | CV11 4LU | NBBC | WK448965 |
| 125 | B | Etone College, Leicester Road, Nuneaton, CV11 6AA | ✓ | CV11 6AA | WCC | WK425515 |
| 126 | B | Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ | ✓ | CV10 0BJ | Private | WK465311 |
| 127 | B | Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH | ✓ | CV11 4QH | WCC | WK468047/WK468048/WK233776 |
| 128 | B | The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Rad | ✓ | CV10 7PD | WCC | WK175243/WK425489 |
| 129 | C | North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH | ✓ | CV11 6BH | Private | WK428695 |
| 130 | B | King Edward VI College, King Edward Road, Nuneaton, CV11 4BE | ✓ | CV11 4BE | Private | WK497842/WK497832 |
| 131 | E | Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP | x | CV12 0DP | WCC | WK426282 |
| 132 | D | Exhall Grange School and Science College, Wheelwright Lane, Bedworth | | | WCC | WK426690 |
| | " | Exhall Grange Special School, Wheelwright Lane, Coventry | | | Private | WK440475 |
| | " | Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP | ✓ | CV7 9HP | Private | WK450903 |
| 133 | E | Quest Academy, North Side of Griff Lane, Nuneaton | ✓ | CV10 7SD | WCC | WK365844 |
| 134 | E | Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton | x | CV12 8AG | WCC | WK240628 |
| | " | Race Leys Middle School, Barton Road, Bedworth, CV12 8HG | | CV12 8HG | Private | WK465841 |
| 135 | B | Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton | | | WCC | WK380085 |
| | " | Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY) | ✓ | CV10 8JH | WCC | WK42667 |
| 136 | C | Whitestone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton | x | CV11 4SQ | WCC | WK23140 |
| 137 | B | Attleborough Mills, Attleborough Road, Nuneaton (aka Holman Way) | x | | Private | WK256088 |
| 138 | B | The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton | x | CV11 5SS | Private | WK430022 |
| 139 | B | St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton | ✓ | CV10 7SD | Private | WK447390 |
| 140 | B | Halfords - land and buildings on the south side of Newtown Road, Nuneaton | x | CV11 5UT | Private | WK390614 |
| 141 | B | Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre) | ✓ | CV10 7HU | Private | WK474729 |
| 142 | C | Land on the North Side of Ambleside Way, Nuneaton CV11 6AT (aka Ambleside Community Sports Club) | ✓ | CV11 6AT | Private | WK392039/WK57909 |

Power of arrest

Name of defendant

(1) Thomas Corcoran
(2) - (54) Others (see attached continuation sheet)

Defendant's address

See attached continuation sheet

Name of court
High Court of Justice
King's Bench Division

Claim No.
QB-2019-000616

Claimant's name (including ref.)
(1) Nuneaton and Bedworth Borough Council
(2) Warwickshire County Council

Defendant's name (including ref.)
(1) Thomas Corcoran
(2) - (54) Others



Date order made 1 7 / 1 2 / 2 0 2 4

Name of judge

The Honourable Mr Justice Cotter

Order made under (insert statutory provision)

Local Government Act 1972, s222

This order includes a power of arrest under (insert statutory provision)

Police and Justice Act 2006, s27

The relevant paragraphs of the order to which a power of arrest has been attached are:

(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

Paragraphs 1(a) to 1(e) inclusive of the Order of the Honourable Mr Justice Cotter dated 17 December 2024
(see attached continuation sheet)

This power of arrest was ordered on 1 7 / 1 2 / 2 0 2 4

and expires on the 1 7 / 1 2 / 2 0 2 9

Note to Arresting Officer

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- the defendant shall be brought before the judge within the 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 the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

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

Name of Claimant

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

Claimant's address

Legal Services

Nuneaton and Bedworth Borough Council
Town Hall
Coton
Nuneaton CV11 5AA

Claimant's phone number

0204 7637 6476

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. QB-2019-000616

**Before the Honourable Mr Justice Cotter
17 December 2024**

B E T W E E N :

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

Claimants

-and-

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

Defendants

POWER OF ARREST: CONTINUATION SHEET

SCHEDULE 1 – LIST OF NAMED DEFENDANTS

List of Defendants and their addresses

- (1) THOMAS CORCORAN – Plot 10 Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
(2) JESSICA DODDS, Plot 10, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
(3) MICHAEL DOYLE, 6 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
(4) LUKE DELANEY, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
(5) PATRICK McGINLEY, Barn Fisheries, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB
(6) ALPHONSUS McGINLEY, 7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
(7) MICHAEL STOKES, 29 Oaktree Field Caravan Site, Odstock Road, Salisbury, Wiltshire SP2 8BY
(8) MICHAEL STOKES, 6 Horsdean Travelers Site, Braypool Lane, Patcham Brighton, East Sussex BN1 8PP
(9) DENNIS STOKES, Plot 6 Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB

- (10) DENNIS STOKES (JNR), Caravan 6 Dun Roamin Park, Whitfield, NN13 5TD
- (11) BRIAN STOKES, 12a, Orchard Drive, Smithy Fen, Cottenham, Cambridgeshire, CB24 8PT
- (12) JOHN MAUGHAN, 14 Long Green, Cressing, Braintree, Essex, CM77 8DL
- (13) TERRY MAUGHAN, 70 Exton Avenue, Luton, Bedfordshire, LU2 0LJ
- ~~(14) TERRY MAUGHAN, 10 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~
- (15) PATRICK MAUGHAN, 12 Bashley Road Caravan Site, Bashley Road, London, NW10 6TH
- (16) OWEN MAUGHAN, 7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (17) OWEN MAUGHAN, 8 Imari Park, 38 Russell Street, Derby DE24 8AL
- ~~(18) BERNARD CORCORAN, No Fixed Abode~~
- ~~(19) FRANCIS CORCORAN, No Fixed Abode~~
- (20) FRANCIS MAUGHAN, 14 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- (21) MARTIN MAUGHAN, 81 Constitution Road, Chatham, Kent, ME5 7DN
- (22) THOMAS MAUGHAN, 11 Kanes Hill Caravan Site, Botley Road, Southampton, SO19 0SA
- (23) JOHN MONGAN, 1 Gapton Hall Road, Great Yarmouth, Norfolk, NR31 0NL
- ~~(24) MARTIN MONGAN, 14 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL~~
- (25) MARTIN MONGAN, 9 Limehouses, Boathorse Road, Stoke-On-Trent, Staffs ST6 4QQ
- (26) LEONARD MONGAN, 8 Pendles Paddock, Marlow Road, Stokenchurch, High Wycombe, Bucks, HP14 3UW
- (27) PAUL McDONAGH, 9 Russell Street, Derby
- ~~(28) SIMON McDONAGH, 3 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~
- (29) BERNARD McDONAGH, 37 Boathorse Road, Stoke-On-Trent, Staffordshire, ST7 4JA
- (30) JOHN McDONAGH, Caravan 7 Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD
- (31) MIKE McDONAGH, 62 De Laly Street, Ashton-On-Ribble, Preston, Lancashire, PR2 2DD
- (32) MARTIN McDONAGH, 29 Speyside Court, Orton, Southgate, Peterborough, PE2 6SN
- (33) AARON McDONAGH, 9 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL
- ~~(34) KATHLEEN McDONAGH, 3 Orchard View, Horseman Side, Brentwood, Essex, CM14 5SU~~

- (35) WINNIE McDONAUGH, Caravan 14, Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD
- ~~(36) MARTIN WARD, 73 Mullacreevie Park, Armagh, BT60 4BB~~
- ~~(37) PAT WARD, 333 Mullacreevie Park, Armagh, BT60 4BB~~
- (38) MICHAEL WARD, Splashes, Castle Acre Road, Swaffham, Norfolk, PE37 7XE
- (39) KATHLEEN WARD, 2 Imari Park, 38 Russell Street, Derby DE24 8AL
- ~~(40) ROSELEEN WARD, 6 St Agnells Lane, Hemel Hempstead, Herts, HP2 7AX~~
- (41) BERNIE SWEENEY, Kanes Hill Caravan Park, 11 Botley Road, Southampton, SO19 USA
- (42) JOHN CONNORS, 2 Costalot Stables, Heath Road, Leicestershire, LE67 1DG
- ~~(43) TRACEY BROWN, 72 Lower Ecton, Ecton Lane Caravan Site, Northants NN3 5HQ~~
- ~~(44) WILLIAM BRIDGES, 16 Ling Croft, Brough, North Humberside, HU15 1TU~~
- ~~(45) TOM WARD, No Fixed Abode~~
- ~~(46) EDDIE McDONAUGH, No Fixed Abode~~
- ~~(47) EDDIE (AKA EDWARD) WARD, No Fixed Abode~~
- ~~(48) CHRISTOPHER McDONAUGH, No Fixed Abode~~
- ~~(49) WILLIAM DOHERTY, No Fixed Abode~~
- ~~(50) GERRY O'BRIEN, No Fixed Abode~~
- ~~(51) ELIZABETH O'BRIEN, No Fixed Abode~~
- ~~(52) PEARL BLAINLEY, No Fixed Abode~~
- ~~(53) FIONA WARD, No Fixed Abode~~
- (54) PERSONS UNKNOWN forming unauthorised encampments within the Borough of Nuneaton and Bedworth

Paragraphs 1(a) to 1(e) of the Order of the Honourable Mr Justice Cotter dated 17 December 2024 (to which the power of arrest applies)

1. Until and including **17 December 2029**, the 1st to 13th (inclusive), 15th to 17th (inclusive), 20th to 23rd (inclusive), 25th to 27th (inclusive), 29th to 33rd (inclusive), 35th, 38th, 39th, 41st and 42nd Defendants (as set out at Schedule 1 to this Order) (the '**Named Defendants**' hereafter)

And

Until and including **17 December 2025**, the 54th Defendant (Persons Unknown)

are **forbidden** from:

- a) Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority or the Secretary of State, or written consent from the Local Planning Authority or in accordance with statutory permitted development rights.
- b) Setting-up an encampment (as defined below) on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, save for where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).
- c) Setting-up an encampment (as defined below) on any part of the Land (as defined below) without Written Permission from the Local Planning Authority, or planning permission granted by the Secretary of State or in accordance with statutory permitted development rights.
- d) Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans/mobile homes other than when driving through the highways on the Land or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority or the Secretary of State, or with Written Permission from the Local Planning Authority or in accordance with statutory permitted development rights.
- e) Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.

Power of arrest

2. ...

Definitions

3. In this Order, the following definitions shall apply:

- a) The **‘Land’** means:
 - i. For the Named Defendants, all land within the Borough of Nuneaton and Bedworth as marked with the red outline on the map attached at Schedule 2 to this Order;
 - ii. For the 54th Defendant (Persons Unknown), all the land marked on the maps at Schedule 3 to this Order and identified by the key to the map and list of sites, and numbered 1 to 142 on that list.

- b) **‘Encampment’** means the entering and/or occupying of any part of land for residential purposes (temporary or otherwise) with caravans/mobile homes.
- c) **‘Controlled Waste’** has the same meaning as within s.75(4) of the Environmental Protection Act 1990.

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: QB-2019-000616

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP1/2'

QUEEN'S BENCH DIVISION

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

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

On the 19th day of March 2019

BETWEEN

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

Claimants

-and-

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

Defendants

ORDER

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

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

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

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

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST FOR BREACH OF PARAGRAPHS 1-9 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006 AND SECTION 4 OF THE ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2-10 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

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

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

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

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

IT IS ORDERED THAT:

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

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

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

6. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.

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

7. Setting up an encampment on any land identified on the attached map and list of sites without written permission from the local planning authority, or, planning permission granted by the Secretary of State.
8. From entering and/or occupying any part of the land identified on the attached map and list of sites for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia.
9. From bringing onto the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with express permission from the owners of the land.
10. Deposit or cause to be deposited, controlled waste in or on the Land unless an waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.
11. There be a power of arrest attached to prohibitions 2-10 of this order.

The Land in this order means:

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

GUIDANCE NOTES

EFFECT OF THIS ORDER

17. A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or his instructions or with his encouragement.
18. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

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

INTERPRETATION OF THIS ORDER

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

COMMUNICATIONS WITH THE COURT

24. All communication to the Court about this order should be sent to Room WG08 Royal Courts of Justice, Strand, London, WC2A 2LL (020 7947 6010).

SCHEDULE 1 – LIST OF DEFENDANTS

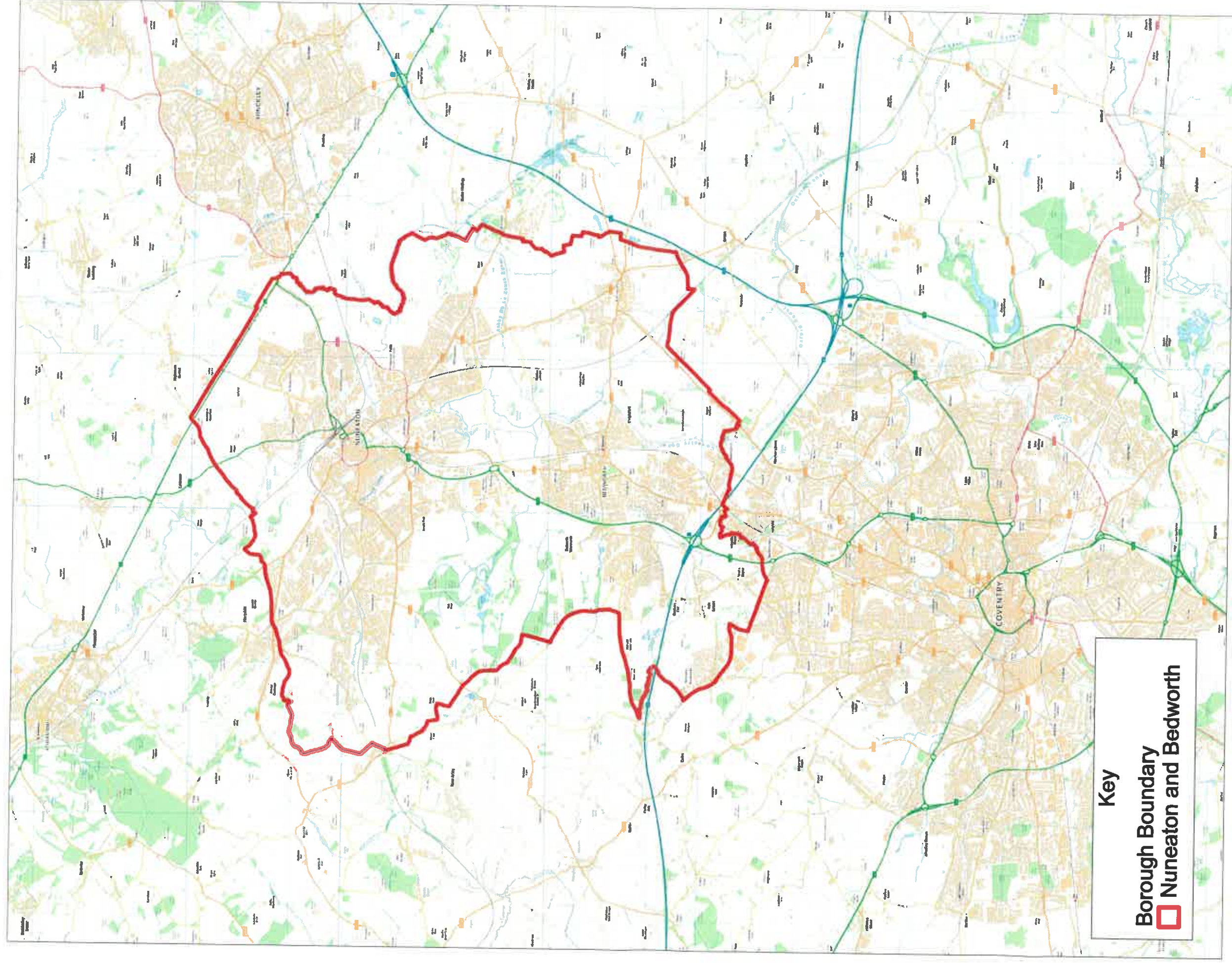
List of Defendants and their addresses

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

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

SCHEDULE 2 – MAP OF THE BOROUGH

Nuneaton and Bedworth Borough Boundary



Key
 Borough Boundary
 Nuneaton and Bedworth

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 Nuneaton and Bedworth Borough Council LA
 100018416 2018/19

Not to scale



SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

| SITE NUMBER | MAP SITE APPEARS ON | SITE | >5 acres | POSTCODE | Land Owner | Title Number |
|-------------|---------------------|--|----------|----------|------------|------------------------------------|
| 1 B | | Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS) | x | | NBBC | WK447699 |
| 2 B | | Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground/Pool Bank St) | ✓ | CV11 5PZ | NBBC | WK446269 |
| 3 B | | Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Nuneaton (aka Stanley Road/Vernons Lane Recreational Ground) | ✓ | CV11 5ET | NBBC | WK447951/ WK240764/ WK236363 |
| 4 B | | Land being car park on the south west side of Corporation Street, Nuneaton (aka Upper Abbey Street Car Park) | x | CV11 5DG | NBBC | WK449599 |
| 5 B | | Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street Car Park 1 and 2) | x | CV11 5QE | NBBC | WK449585/ WK178804 |
| 6 B | | Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2) | x | CV11 4BW | Private | WK398436 |
| 7 B | | Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park) | x | CV11 5DB | NBBC | WK450184 |
| 8 B | | Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park) | x | CV11 4BS | Private | WK366584 |
| 9 B | | Land and buildings on the east side of Broad Street, the north side of Queen's Road and the south west side of Abbey Street (aka Abbey Street Car Park) | x | CV11 5NE | NBBC | WK251517 |
| 10 B | | Land at Church Street, Nuneaton (aka Church Street Car Park) | x | CV11 4AS | NBBC | WK449976 |
| 11 B | | Land and buildings lying to the East of Coton Road (aka Town Hall Car Park) | x | CV11 5AA | NBBC | WK88582 |
| 12 B | | Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park) | x | CV11 4AL | NBBC | WK426642 |
| 13 B | | Land at Coton Road, Nuneaton (aka Riverside Car Park) | x | CV11 5AA | NBBC | WK450296 |
| 14 B | | Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park) | x | CV11 5JF | NBBC | WK448678 |
| 15 B | | Land to the south side of Bermuda/land lying to the east and west of Coventry Road, Chilvers Coton/land on the west side of a road leading from Coventry to Nuneaton and a balancing lake and land to the south of Bermuda Road, Nuneaton (aka Bermuda Balancing Lake) | ✓ | | NBBC | WK446511/ WK284250/ WK345891 |
| 16 C | | Recreation Ground at Easyboro Way, Nuneaton (aka Attleborough Recreational Ground) | ✓ | CV11 4PY | NBBC | WK449338 |
| 17 C | | Land on south side of Lutterworth Road, Nuneaton (aka Pauls Land) | ✓ | CV11 6QA | NBBC | WK449027 |
| 18 B | | Land lying to the north east of Braemer Way, Nuneaton, Land on the south west and north east sides of Greenmoor Road & Land lying to the south east side of croft road (aka Jubilee Sports Centre) | ✓ | CV10 7EL | NBBC | WK48784/ WK448021/ WK448237 (part) |
| 19 B | | Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton (aka Marsdale Drive) | ✓ | | NBBC | WK342561/ WK355952 |
| 20 B | | Land at Recreation Ground, Tomkinson Road, Nuneaton | ✓ | CV10 8DS | NBBC | WK447355 |
| 21 B | | Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road (aka Whittleford Park) | ✓ | CV10 8PY | NBBC | WK130458/ WK447033 |
| 22 E | | Land on the south side of Marston Lane, Nuneaton (aka Bailey Park) | ✓ | CV12 8DR | NBBC | WK448160 |
| 23 E | | Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground) | ✓ | | NBBC | WK448256 |
| 24 E | | Spitalfields 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the north-west side of Rye Piece Ringway, Bedworth & Zion Chapple, High Street Bedworth | x | CV12 8NF | NBBC | WK448876/ WK246825/ WK448601 |
| 25 E | | Park Road (Car Park) - land on the east side of Park Road, Bedworth | x | CV12 8LH | NBBC | WK448511 |
| 26 F | | Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barnacle Lane, Bulkington, Bedworth | ✓ | | NBBC | WK448611/ WK448624(part) |

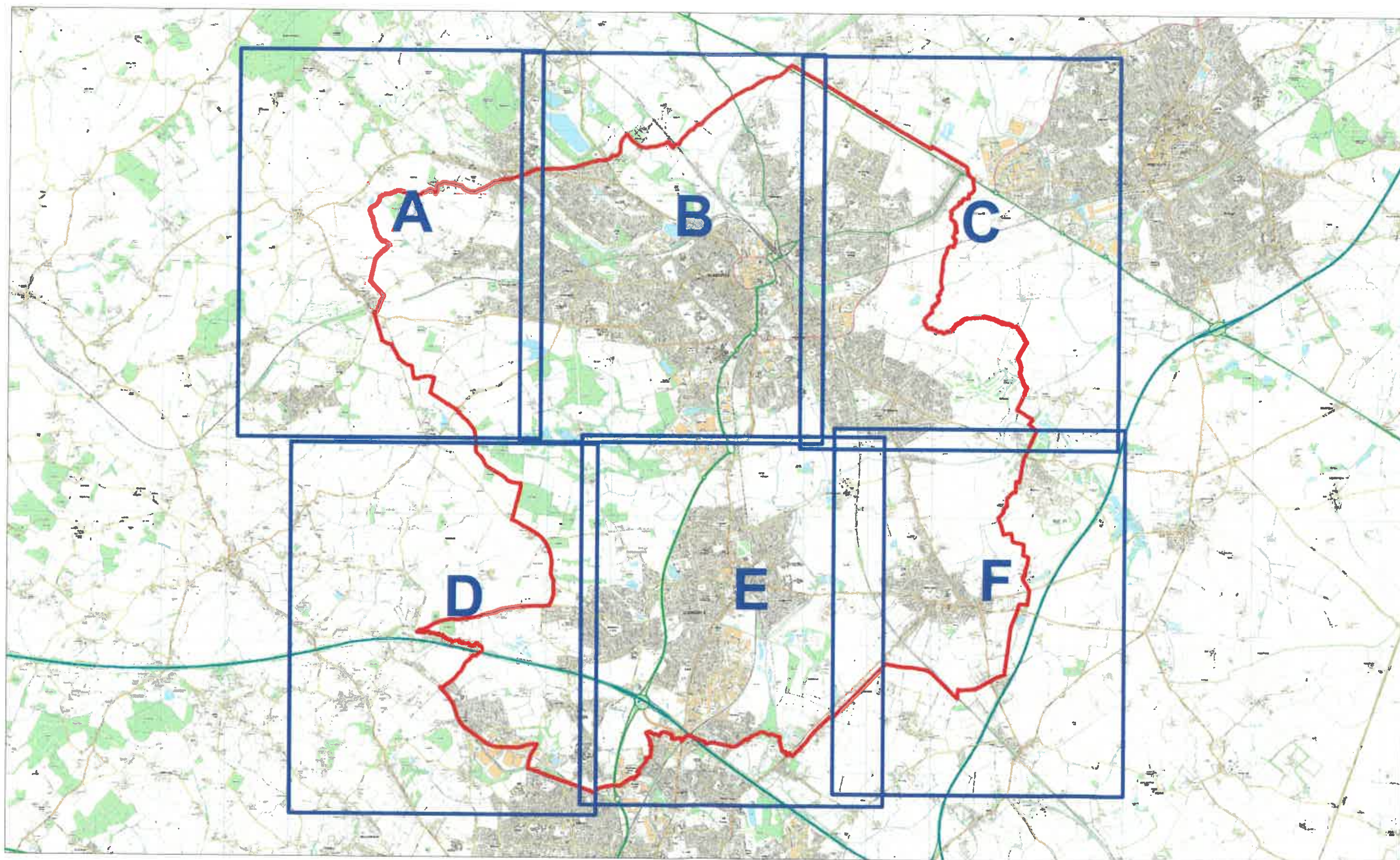
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| 27 | F | Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth | x | CV12 9RF | NBBC | WK448510/ WK448500 |
| 28 | F | Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ) | ✓ | CV12 9LT | NBBC | WK449849 |
| 29 | B | Land on the south west side of Queen Elizabeth Road, Nuneaton | ✓ | CV10 9DA | NBBC | WK439320 |
| 30 | B | Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsden Avenue, Nuneaton (aka Stubbs Pool) | ✓ | CV10 9DJ | NBBC | WK448197/ WK448093 |
| 31 | B | Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Dingle, Queen Elizabeth Road, Nuneaton (aka The Dingle) | ✓ | CV10 9DE | NBBC | WK373679/ WK448013 |
| 32 | B | Land on the south side of Willow Road, Nuneaton | ✓ | | NBBC | WK447731 |
| 33 | D | Land on the West side of Blackberry Lane, Bedworth | ✓ | | NBBC | WK137139 |
| 34 | E | Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry | ✓ | CV7 9EX | NBBC | WK450050 |
| 35 | D | Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedworth | ✓ | CV7 8NG | NBBC | WK124031 |
| 36 | E | Land lying to the North West of Rowley's Green Lane, Exhall, Coventry (aka Silverstone Drive) | ✓ | | NBBC | WK336223 |
| 37 | E | St. Giles Recreational Ground - Land on the South side of Vicarage Lane, Exhall, Bedworth and Land lying to the West of St Giles Road, Exhall | x | CV7 9GZ | NBBC | WK143991/ WK154857 |
| 38 | B | Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Marl.) | ✓ | CV10 9TD | NBBC | WK358453 |
| 39 | A | Land south-east of Hickman Road, Galley Common, Nuneaton (aka Chaucer Drive) | ✓ | CV10 9SD | NBBC | WK339730 |
| 40 | A | Nuneaton & North Warks Group Riding for Disabled, Valley Road, Galley Common (CV10 9NJ) / land at Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NJ) (aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre) | x | CV10 9PZ | NBBC | WK447381/ WK439120/ WK244039/ WK238145 |
| 41 | B/A | Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the north east side of Merlin Avenue, south east side of Freesland Rise, Whittleford and land lying to the West of Bucks Hill (aka Freesland Rise) | ✓ | CV10 9QF | NBBC | WK319146/ WK326554 |
| 42 | B/A | Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Fernsham Drive/Poplar Tree Farm EA) | ✓ | ~ | NBBC | WK319145 |
| 43 | A | Land on Galley Common, Nuneaton; land at Galley Common Nuneaton and Land on the south side of Plough Hill Road, Stockingford (aka North Field) | ✓ | CV10 9PZ | NBBC | WK238447/ WK238145/ WK324522 |
| 44 | B | Land on the south side of Sherbourne Avenue, Nuneaton | x | CV10 9JH | NBBC | WK234444 |
| 45 | D | Land on the south side of Cardigan Road, Bedworth (aka Anderton Road POS) | ✓ | CV12 0HD | NBBC | WK281821 |
| 46 | E | Land and Buildings at Market End Farm and Orchard Farm, Smorrall Lane | ✓ | CV12 0GE | Private | WK380708 |
| 47 | E | Newdigate Recreational Ground - Land at Smorrall Lane, Bedworth | ✓ | CV12 0JP | NBBC | WK449987 |
| 48 | A | Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thornions Way) | ✓ | CV10 8NN | NBBC | WK32497 |
| 49 | A | Kingswood Road Recreational Ground - Land on the North side of Ansley Road, Stockingford | x | CV10 9QG | NBBC | WK32497 |
| 50 | B | Stockingford Recreational Ground - Land on the west side of Westbury Road, Nuneaton and land on the north east side of Grove Road, Nuneaton and land lying to the west of Nuneaton Road | ✓ | CV10 8JX | NBBC | WK448137/ WK448304/ WK317827 |
| 51 | E | Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth | ✓ | CV12 8NW | NBBC | WK449032 |
| 52 | E | Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way) | x | CV6 6TE | Private | WK394575 |
| 53 | E | Land on the North side of Bulkington Road and land on the South side of Johnson Road/Alex Wilson Centre, 34 Nuneaton Road, Bedworth (CV12 8AL) and land lying to the west of Wootton Street and land at Elizabeth Centre, Johnson Road | ✓ | CV12 9BH | NBBC | WK169700/ WK448169/ WK250992/ WK448429 |
| 54 | E | Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth | ✓ | CV12 8JT | NBBC | WK449032 |
| 55 | E | Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth | x | CV12 8NN | NBBC | WK449032 |
| 56 | E | Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth | x | CV12 8JT | NBBC | WK449032 |
| 57 | E | Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth | x | CV12 8JG | NBBC | WK366034 |
| 58 | E | Land at Arbury Avenue, Bedworth (aka Arbury Road POS) | x | | NBBC | WK448598 |
| 59 | E | Collycroft Recreational Ground - Land lying to the east of Amos Jacques Road, Collycroft, Bedworth and land to the west of Nuneaton Road/Alex Wilson Centre 34 Nuneaton Road Bedworth and land to the west of Nuneaton Road | ✓ | | NBBC | WK295888/ WK460024/ WK448169/ WK317827 |
| 60 | E | Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road) | x | CV12 0AL | NBBC | WK449846 |
| 61 | C | Land lying to the north of Buttermere Avenue, Nuneaton | ✓ | CV11 6EP | NBBC | WK210986 |

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| 62 | C | Land at Horselton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton | x | | NBBC | WK336798/ WK344607 |
| 63 | C | Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way | x | CV11 6YB | NBBC | WK447654/ WK319282 |
| 64 | C | Recreation Ground, The Long Shoot, Nuneaton, (CV11 6JH) | x | CV11 6JH | NBBC | WK446886 |
| 65 | C | Land at Horselton Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Drive/Tavistock Way) | ✓ | CV11 6YL | NBBC | WK336798/ WK447654 |
| 66 | C | Land on the east side of Changebrook Close and land on the west and east side of Pallett Drive, Nuneaton | ✓ | ~ | NBBC | WK345480/ WK309853 |
| 67 | B | Land on the south side of Church Lane, Nuneaton (Cleaver Gardens/Sandon Fields) | ✓ | CV10 0HG | NBBC | WK448958 |
| 68 | B | Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue, Nuneaton (aka Coronation Walk) | ✓ | CV10 0BN | NBBC | WK448096/ WK448091 |
| 69 | B | Land at Bradestone Road, Nuneaton | x | | NBBC | WK450499 |
| 70 | B | Land on the north side of Donnithorne Avenue, Nuneaton (aka Caldwell Grange) | x | | NBBC | WK452385 |
| 71 | B | Land on the south side of Avenue Road, Nuneaton (aka Gala Fields) | ✓ | | NBBC | WK452276 |
| 72 | B | Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground) | ✓ | | NBBC | WK448965 |
| 73 | B | Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton | x | | NBBC | WK449842/ WK449819 |
| 74 | B | Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton | x | CV11 5PQ | NBBC | WK447475 |
| 75 | B | Land at Donnithorne Avenue, Nuneaton; land lying to the east of Raveloe Drive, Nuneaton; land on the east side of Marston Lane, Nuneaton and Land on the east and west sides of Marston Lane, Nuneaton (aka Marston Lane Fields) | ✓ | CV11 4RE | NBBC | WK452370/ WK452349/ WK449466/ WK449734 |
| 76 | B | Land lying on the north side of St Georges Way, Nuneaton and land on the North side of St Georges Way, Chilvers Coton | ✓ | CV10 7BX | NBBC | WK448537/ WK344972 |
| 77 | B | Riversley Park, Coton Road, Nuneaton | ✓ | CV11 5TY | NBBC | WK450206/ WK450173 |
| 78 | B | Land at Sorrell Road, Nuneaton | ✓ | CV10 7AW | NBBC | WK450035 |
| 79 | B | Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton | x | CV11 5TX | NBBC | WK450206/ WK450173 |
| 80 | B | Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park) | ✓ | CV11 4LX | NBBC | WK448965 |
| 81 | C | Crowhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton | ✓ | CV11 6XA | NBBC | WK370915 |
| 82 | B | Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton | x | CV11 4PW | NBBC | WK310067 |
| 83 | E | Land at Acacia Crescent, Bedworth | x | | NBBC | WK448428 |
| 84 | B | Land at Dunns Close, Nuneaton | x | | NBBC | WK452330 |
| 85 | E | Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry) | x | | Private | WK394575 |
| 86 | C | Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton | x | | WCC | WK271645/ WK455358 |
| 87 | E | Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA) | ✓ | CV12 9EA | WCC | WK470015/WK424958 |
| 88 | D/E | Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH) | ✓ | CV7 9AH | Private | WK463626 |
| 89 | E | Race Leys Infant School, Bedworth | x | CV12 8AD | WCC | Unregistered |
| 90 | E | Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP) | ✓ | CV12 0HP | WCC | WK424335 |
| 91 | E | All Saints Bedworth C of E Primary School and Nursery, Bedworth | x | CV12 9HP | WCC | Unregistered |
| 92 | F | Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth | x | CV12 9RT | WCC | WK79471 |
| 93 | E | The Cannons C of E Primary School - aka Land and buildings on the South side of Derwent Road, Bedworth | ✓ | CV12 8RT | Private | WK225063 |
| 94 | E | Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth | x | CV7 9FJ | WCC | WK33092 |
| 95 | D | Keresley Newland Primary Academy and Keresley Newland School, , Grove Lane, Keresley, Coventry, (CV7 8JZ) | ✓ | CV7 8JZ | WCC | WK427632/WK477207 |
| 96 | D | Newdigate Primary School and Nursery - aka Land lying to the South of Smorral Lane, Goodyears End, Bedworth and Land lying to the South of smorral Lane Bedworth | ✓ | CV12 0HA | WCC | WK27604/WK134659 |
| 97 | D/E | Wheelwright Lane Primary School, Ash Green, Coventry | ✓ | CV7 9HN | WCC | WK425267 |
| 98 | E | St Francis Roman Catholic School, Nicholas Street, Bedworth | x | CV12 8JN | Private | WK262596 |
| " | | Land lying to the North of Rye Piece Ringway, Bedworth | | | Private | WK476476 |

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| | " | Land on the East Side of Nicholas Street, Bedworth | | | WCC | WK171388 |
| 99 | E | St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth | ✓ | CV7 9NS | WCC | WK171647 |
| 100 | F | St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF) | ✓ | CV12 9PF | Private | WK461720 |
| | " | Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth, CV12 9PF | | | Private | WK472707 |
| 101 | E | St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9DA) | ✓ | CV12 9DA | Private | WK479304 |
| 102 | B | Land adjoining St Thomas More Catholic School and Sixth Form College, Greenmoor Road, Nuneaton, CV10 7EX | ✓ | CV10 7EX | Private | WK478035 |
| | " | St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX | | | Private | WK477630 |
| | " | Arbury High School, Greenmoor Road, Nuneaton | | | Private | WK233418 |
| 103 | B | Abbey C of E Infant School, Nuneaton | x | CV11 5EL | WCC | Unregistered |
| 104 | B | All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT) | x | CV10 7AT | Private | WK461748 |
| 105 | B | Camp Hill Primary School, aka Land to the South of Tuttle Hill, Camp Hill, Nuneaton | ✓ | CV10 9QA | WCC | WK409218 |
| 106 | C | Chetwynd Junior School, aka Land lying to the South of Gipsy Lane, Nuneaton | ✓ | CV11 4SE | WCC | WK170501 |
| 107 | B | Land at Judkins Quarry Tuttle Hill, Nuneaton (aka Recycling Centre) | ✓ | CV10 0HU | WCC | WK393091 |
| 108 | B | Chilvers Coton Community Infant School, Frank Street, Nuneaton (CV11 5RB) | x | CV11 5RB | WCC | WK424955 |
| 109 | B | Croft Junior School, aka Land lying to the west of Northumberland Avenue, Nuneaton | ✓ | CV10 8ER | WCC | WK239413 |
| 110 | B | Galley Common Infant School, Nuneaton | x | CV10 9NZ | WCC | Unregistered |
| 111 | C | Milby Primary School, aka Land lying to the East of Higham Lane, Nuneaton | ✓ | CV11 6JS | WCC | WK205172 |
| 112 | B | Glendale Infant School, aka Land on the south side of Skye Close, Nuneaton | x | CV10 7LW | WCC | WK178493 |
| 113 | B | Middlemarch School, Nuneaton | ✓ | CV10 7BQ | WCC | Unregistered |
| 114 | B | Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY) | x | CV10 8HW | WCC | WK426673 |
| | " | Land and buildings on the south side of St Paul's Road, Nuneaton | | | WCC | WK380085 |
| 115 | B | Our Lady of the Angels Infant School and St Josephs RC First School at Coton Road, Nuneaton | x | CV11 5TY | Private | WK226511 |
| | " | Our Lady of the Angels Infant School and St Josephs RC First School, Coton Road, Nuneaton, CV11 5TY | | | Private | WK477543 |
| 116 | A | Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Ansley Road, Nuneaton | ✓ | CV10 8NL | Private | WK470637 |
| | " | Land on the North Side of Ansley Road, Nuneaton | | | Private | WK189736 |
| 117 | B | Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR | | | Private | WK471379 |
| 118 | B | St Pauls C of E Primary School, Nuneaton | x | CV10 8NH | | Unregistered |
| 119 | B | Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton | x | CV10 0JX | Private | WK480568 |
| | " | St. Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 0JX | | | Private | WK449953 |
| 120 | B | Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH | x | CV11 4QH | Private | WK468047 |
| | " | Oakwood Secondary School, Morris Drive, Nuneaton | | | Private | WK468048 |
| | " | Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH | | | WCC | WK233776 |
| 121 | C | Playing field adjoining St Nicholas C of E Primary School, Windemere Avenue, Nuneaton CV11 6HJ | x | CV11 6HJ | WCC | WK473130 |
| | " | Land on the East Side of Windemere Avenue, Nuneaton | | | Private | WK131856 |
| | " | St Nicolas C of E First School, Windemere Avenue, Nuneaton, CV11 6HJ | | | Private | WK473119 |
| 122 | B | Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton | ✓ | CV10 0DR | WCC | WK149023/WK216447 |
| 123 | B | Land at George Elliot School, Raveloe Drive, Nuneaton, CV11 4QP | ✓ | CV11 4QP | Private | WK458966 |
| 124 | B | Wembrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton | ✓ | CV11 4LU | NBBC | WK448965 |
| 125 | B | Etone College, Leicester Road, Nuneaton, CV11 6AA | ✓ | CV11 6AA | WCC | WK425515 |
| 126 | B | Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ | ✓ | CV10 0BJ | Private | WK465311 |
| 127 | B | Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH | ✓ | CV11 4QH | WCC | WK468047/WK468048/WK233776 |
| 128 | B | The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Rad | ✓ | CV10 7PD | WCC | WK175243/WK425489 |
| 129 | C | North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH | ✓ | CV11 6BH | Private | WK428695 |

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|-----|---|---|---|----------|---------|-------------------|
| 130 | B | King Edward VI College, King Edward Road, Nuneaton, CV11 4BE | ✓ | CV11 4BE | Private | WK497842/WK497832 |
| 131 | E | Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP | x | CV12 0DP | WCC | WK426282 |
| 132 | D | Exhall Grange School and Science College, Wheelwright Lane, Bedworth | | | WCC | WK426690 |
| " | | Exhall Grange Special School, Wheelwright Lane, Coventry | | | Private | WK440475 |
| " | | Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP | ✓ | CV7 9HP | Private | WK450903 |
| 133 | E | Quest Academy, North Side of Griff Lane, Nuneaton | ✓ | CV10 7SD | WCC | WK365844 |
| 134 | E | Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton | x | CV12 8AG | WCC | WK240628 |
| " | | Race Leys Middle School, Barton Road, Bedworth, CV12 8HG | | CV12 8HG | Private | WK465841 |
| 135 | B | Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton | | | WCC | WK380085 |
| " | | Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY) | ✓ | CV10 8JH | WCC | WK42667 |
| 136 | C | Whitestone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton | x | CV11 4SQ | WCC | WK23140 |
| 137 | B | Attleborough Mills, Attleborough Road, Nuneaton (aka Holman Way) | x | | Private | WK256088 |
| 138 | B | The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton | x | CV11 5SS | Private | WK430022 |
| 139 | B | St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton | ✓ | CV10 7SD | Private | wk447390 |
| 140 | B | Halfords - land and buildings on the south side of Newtown Road, Nuneaton | x | CV11 5UT | Private | WK390614 |
| 141 | B | Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre) | ✓ | CV10 7HU | Private | WK474729 |

Key for traveller encampment maps



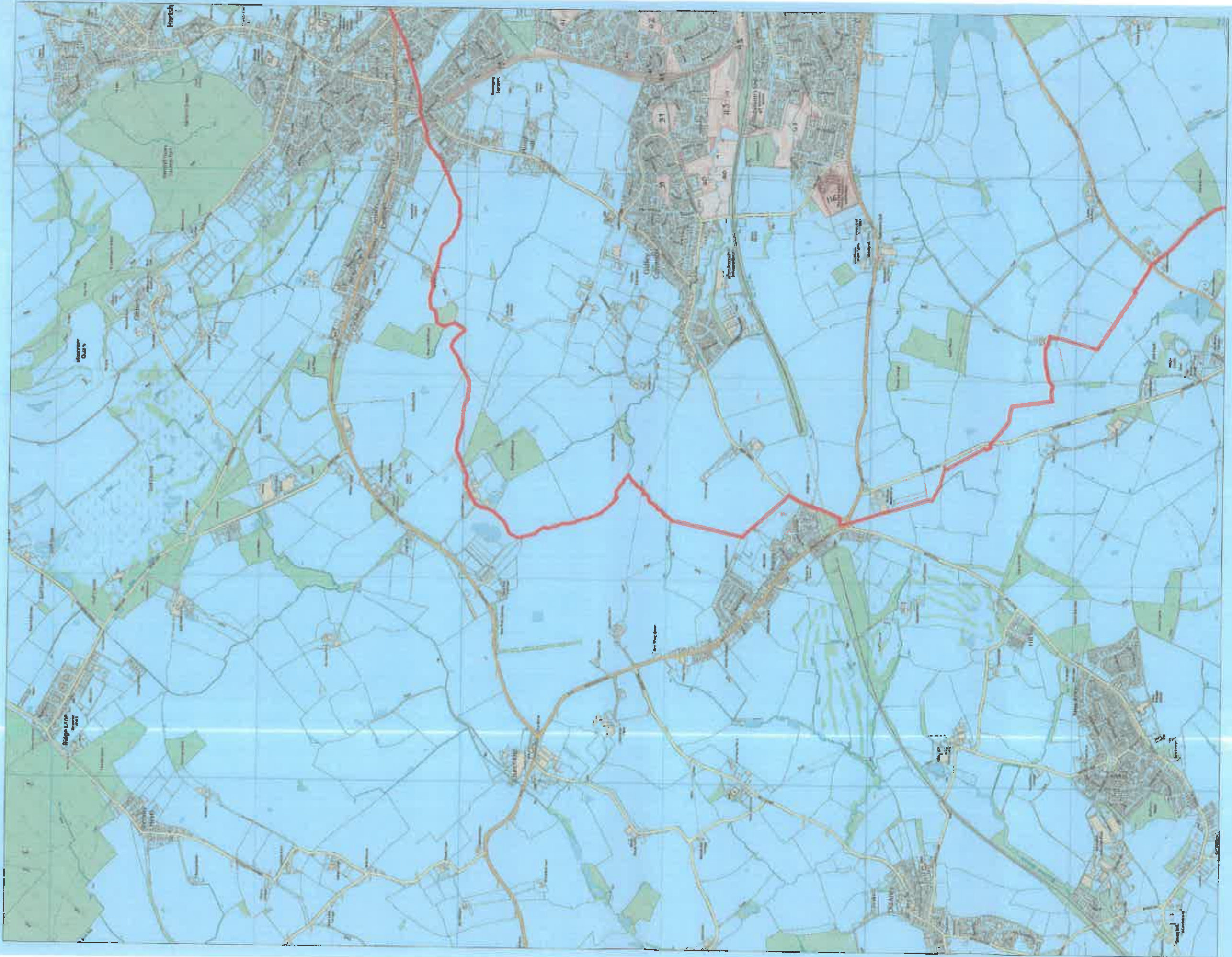
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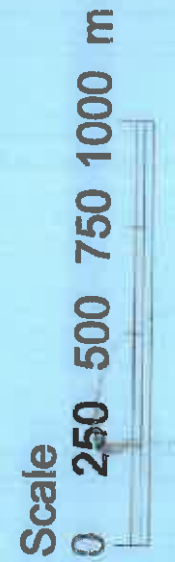


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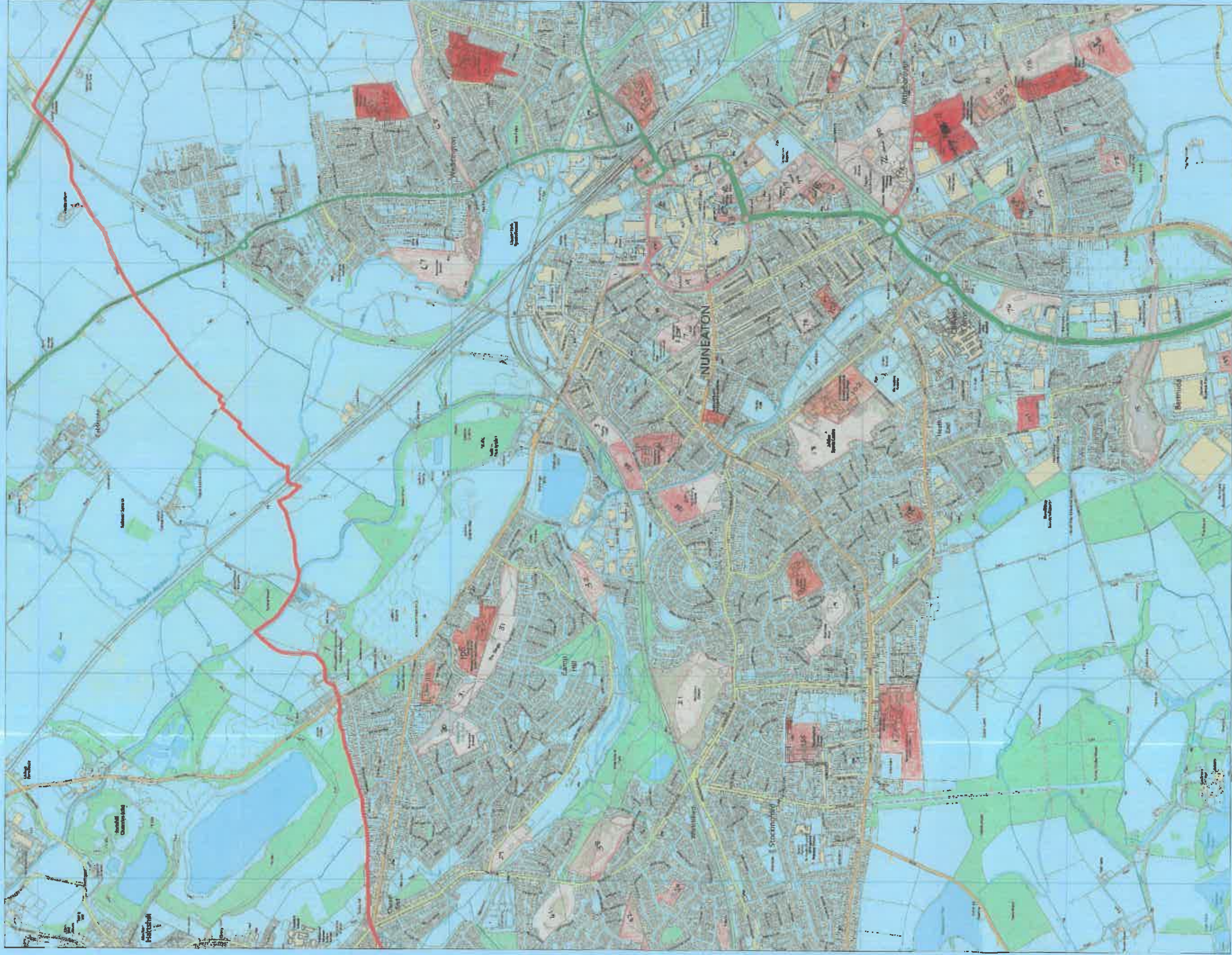
Northwest Nuneaton



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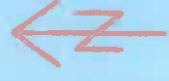


North of Nuneaton

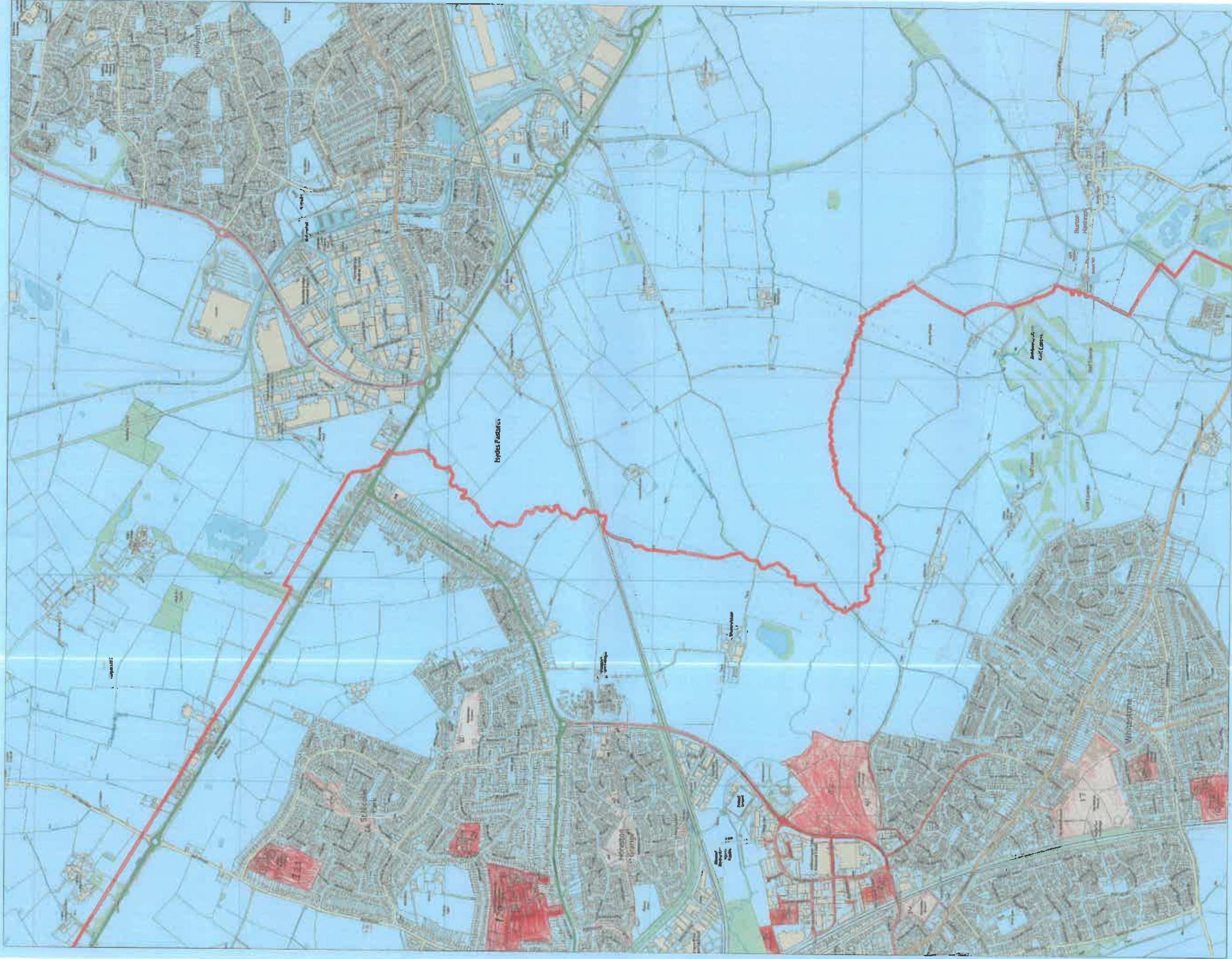


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Northeast Nuneaton

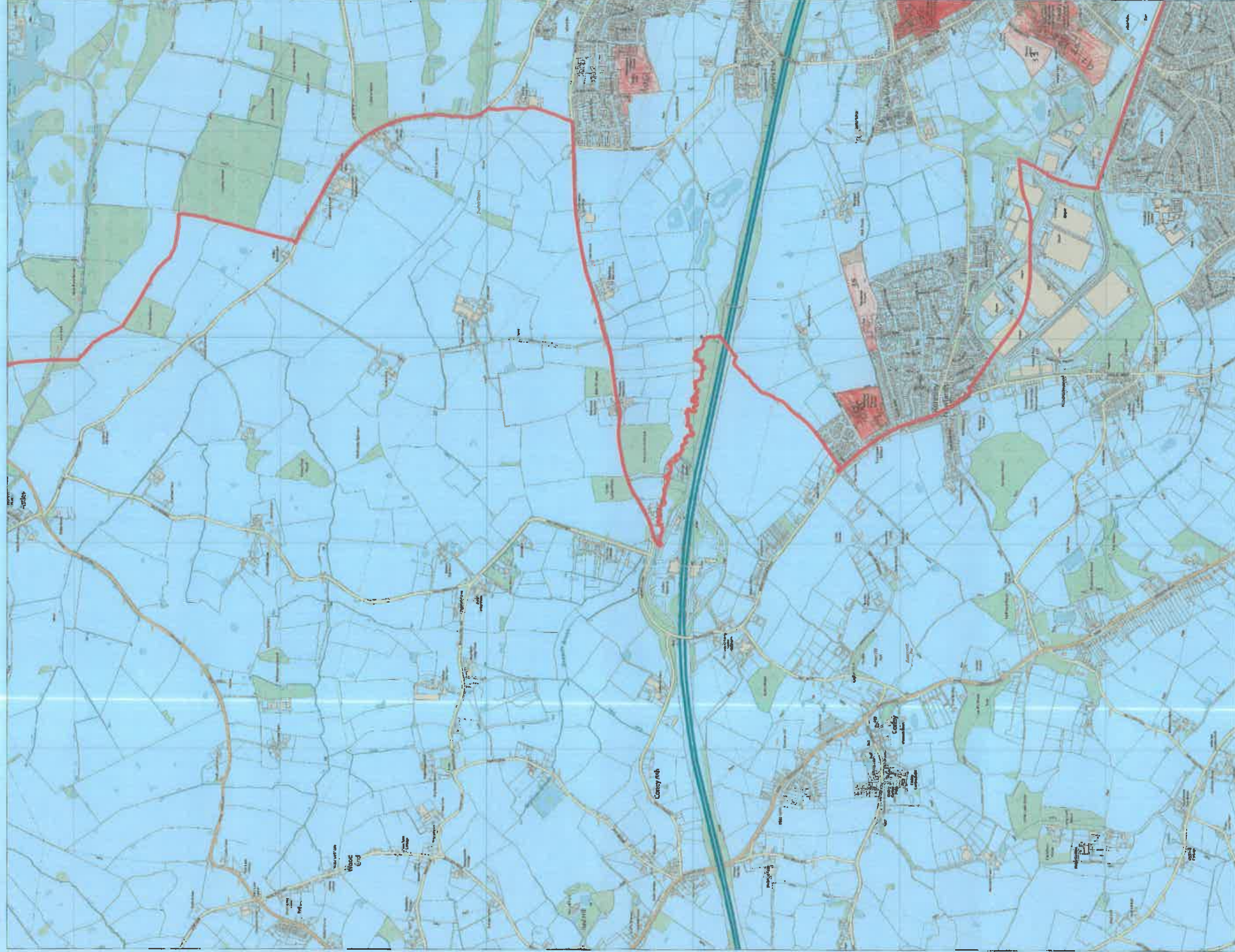


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Southwest Bedworth



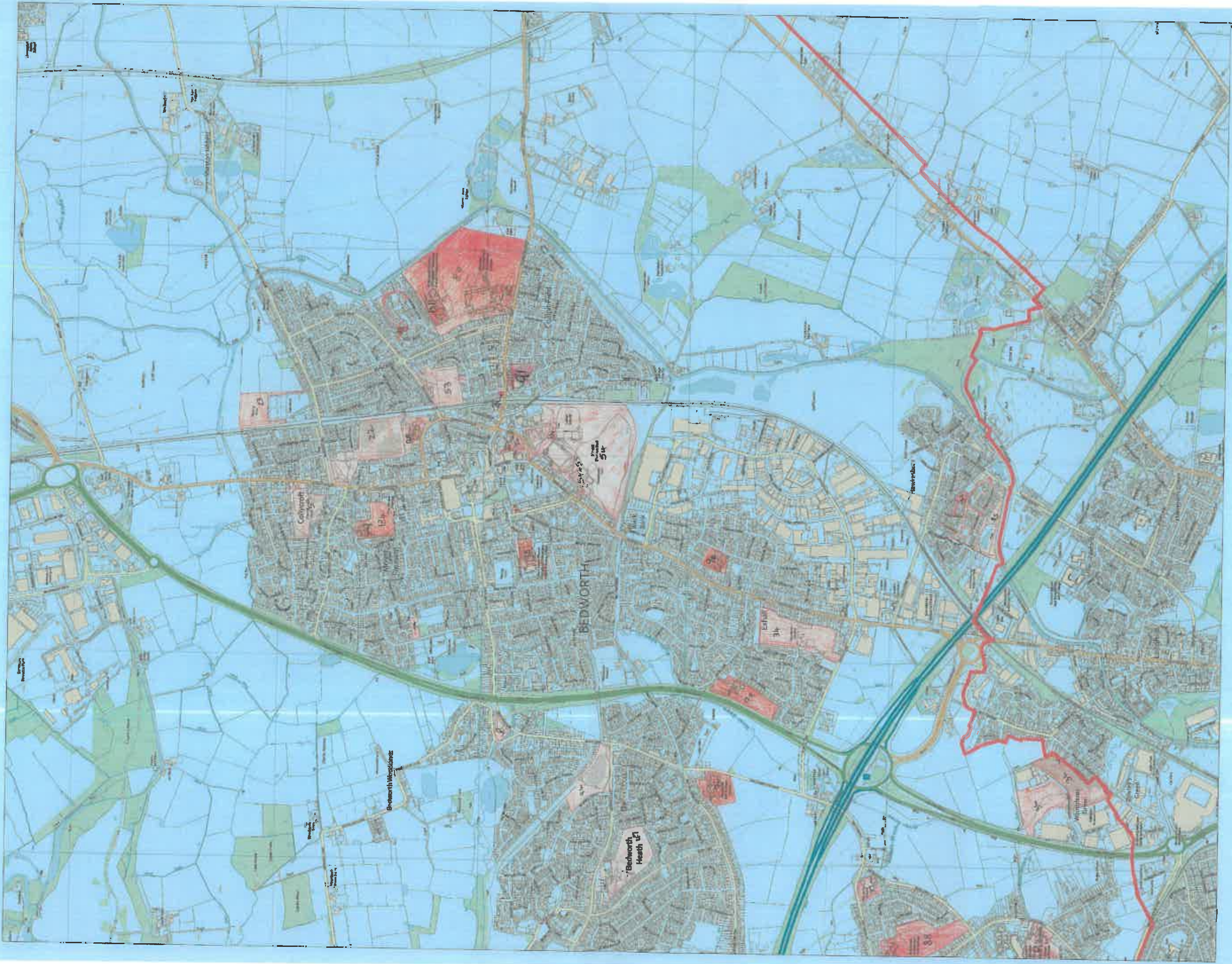
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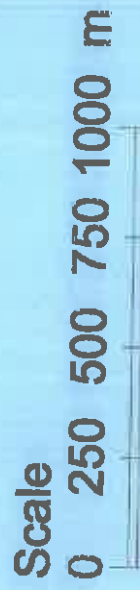


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South of Bedworth

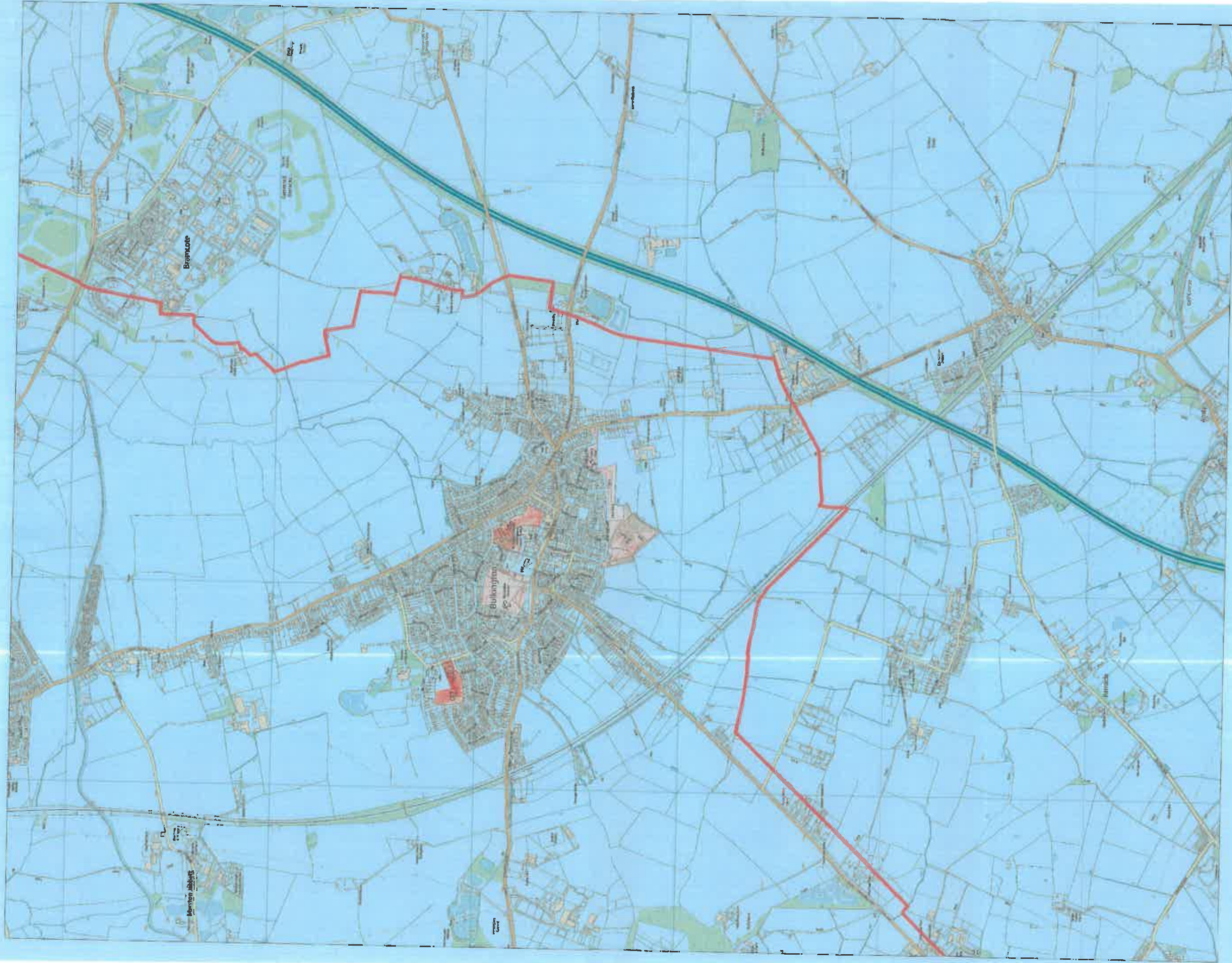


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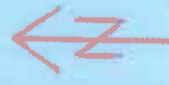
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Southeast Bedworth



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**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION**

Claim No: QB-2019-000616

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit ‘AP1/3’

The Warwickshire Protocol 2025

Countywide process of dealing with Unauthorised Encampments in
Warwickshire



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1. Introduction

1.1. The Warwickshire Countywide Protocol was established in 2017 following research and experience that suggested that over the previous four years most local authority areas in Warwickshire have experienced an increase in unauthorised encampments by Gypsy and Traveller communities. This experience was also felt in Coventry and the West Midlands as a whole. Amongst numerous factors that contributed to these high numbers of encampments, a major factor to this was and still is due to a lack of suitable sites for prolonged stopping, population growth in the Gypsy and Traveller communities and due to members of the community continuing to practice a nomadic habit of life in accordance with their cultural identity.

1.2. Over the last two years there has been a significant reduction in numbers of encampments experienced across the County with numbers of vehicles and caravans in many cases reduced in size. There will be numerous factors that have caused these changes including families settling on purchased land, acquired injunctions protecting land across parts of the County and traditional events no longer taking place in the County.

1.3. It is evident that despite numbers of encampments reducing there are at times continued tensions and criticism from settled residential communities, who continue to seek effective responses from their local elected representatives where there remain some instances of criminal and antisocial behaviour from within and outside of the encampment. These at times continue to impact on local authorities, private land owners, the courts and the police in terms of resource, time and cost. Irrelevant of the numbers of encampments it is crucial that our collective response under the protocol remains proportionate and balanced at all times.

1.4. This protocol is aimed at ensuring that the response to unauthorised encampments from local authorities, private landowners, the police and other salient agencies is cohesive, consistent, efficient and effective. It seeks to provide a set of shared principles and processes with clearly identified leads

1.5. Good communications and negotiation, setting clear expectations, seeking positive outcomes and being committed to challenging crime and disorder are key themes of this document. It is very important to maintain public confidence and uphold the law whilst being cognisant of the rights of the Gypsy and Travelling communities. Post encampment review is also a vital aspect of this document.

1.6. In following this protocol some key principles need to be established. The law needs to be upheld and action applied in a pragmatic, fair and balanced way. Behind all decision making should be the principles of justification, proportionality, legality and absolute necessity.

1.7. Whilst action will in most cases inevitably have to be taken, it is in a spirit of negotiation, clear communication and a partnership approach. Decision makers should take account of threat, harm and risk presented by the unauthorised encampment whilst being cognisant of issues relating to vulnerability, welfare and safeguarding in relation to members of the encampment. Ultimately decision making should take into account the needs, fears and concerns of the settled community.

1.8. On 28th June 2022 following a long consultation period Police powers have been strengthened under the Police, Crime, Sentencing and Courts Act 2022 with the introduction of new and amended powers, these powers are not an automatic default but will be incorporated into this Countywide Protocol.

2. Initial Actions

2.1. Following the report of an unauthorised encampment the information detailed within Appendix 2 should be collated upon first response to the encampment. It is the responsibility of the lead agency (see para. 2.2) to ensure this information is recorded. It is accepted it may not be the lead agency making the first response. Experience would tend to suggest it will probably be the police. However, the lead agency should ensure it is in possession of the information no later than one working day after receiving the first report of the encampment.

2.2. A positive and professional initial response is essential in setting the tone and effectiveness of the subsequent processes. It is a first priority to establish whether the land in question is owned by any of the signatories to this Protocol and if it is, that agency will be the lead agency.

2.3. Where the land trespassed on is owned privately, the district/borough local authority will offer initial advice if requested as the landowner may be inexperienced in such matters. However, it should be noted a district/borough local authority cannot make decisions for a private landowner. Distinct ownership and efficient positive action are the key steps to successful outcomes. It is vital the lead agency has a clearly appointed person(s) able to deal with and make decisions about the encampment. It is also extremely important to engage with the trespassers present at the encampment and those residing on the unauthorised encampment as the Site Code of Conduct Notice should be explained and served as soon as practicable by the lead agency or by the police on behalf of the lead agency. (See Appendix 3)

2.4. Within one to two working days an information sharing meeting should have been established to consider the views of all relevant stakeholders including the Gypsy and Travelling community. This is the responsibility of the lead agency. This may be a physical meeting, on or off site or virtual e.g. telephone conferencing, video conferencing. It is imperative that views are taken from decision makers representing all the relevant partners. A full assessment of the situation and associated risks should be made.

2.5. The meeting should clearly define the planned way forward with a suitable, appropriate, decided timeframe whether leading to a scheduled eviction or a negotiated stay. The plan and key document should be revisited and revised regularly according to need. A significant incident on the site or raised tensions in the local settled community should give cause to conducting an early review.

2.6. Each local Authority is responsible for keeping accurate records of each unauthorised encampment that they are involved in managing. Information held on the Warwickshire Police site assessment document may be shared where appropriate and proportionate in line with local information sharing agreements.

2.7. Key issues to take into account are the intentions of the Gypsy and Travelling community, their actual behaviours, any welfare issues and the potential for criminal or anti-social activity associated with the unauthorised encampment. It is also very important to be cognisant of any criminal or anti-social activity being perpetrated by members of the settled community towards the encampment. Such behaviours and disruption will be viewed seriously. Whether the encampment is on land that is private, residential, public or business related is irrelevant. However, it is accepted local authorities have no control over private land owners actions or decisions. Private land owners do have recourse to powers under common law and the Civil Procedures Rule to help resolve the situation. Police powers may be considered where relevant.

3. Communication

3.1. Good, timely, communication at all stages of dealing with an unauthorised encampment is vital to ensuring that local residents and businesses and the Gypsy and Traveller community are aware of the actions that are being taken to bring about a positive resolution. This protocol does not seek to prescribe all communication methodologies as the circumstances of each unauthorised encampment will be different and the communications tailored to suit as necessary. However, it should be a key priority when an unauthorised encampment occurs to establish a communication strategy, owned by the lead agency and supported by the other agencies as appropriate. This will provide consistency of communications and allow for a co-ordinated response.

3.2. The lead agency will be responsible for the co-ordination of the communications activities and should ensure clear ownership is established for individual elements, though these may be delivered by other agencies. For example the Police and County Gypsy Traveller Team.

3.3. It should be recognised that communication is a two-way process and, as such individuals and networks can pass back information in respect of the impact the encampment is having on the local settled communities. Such feedback should be acknowledged and documented and used by the responsible agencies to further assess the encampment and its consequences. Any criminal activity or anti-social behaviour should be reported directly to the police.

3.4. As a general principle, it is important that the public has clear information about the ways in which agencies will deal with unauthorised encampments, before, during and after they occur. This should deal not only with encampments on public/local authority land or the highway, but also provide practical information and guidance for members of the public dealing with encampments on private land. A flow chart to show private and local authority process is within Appendix 5.

3.5. Consistency of communication is key to ensuring that conflicting information is avoided. It is preferable that there should be one central 'hub', to which agencies can signpost the public towards and from which updates can be shared. The Warwickshire County Council unauthorised traveller sites web page at:-

<http://www.warwickshire.gov.uk/travellerunauthorisedsites> is the suggested basis for such an information hub, particularly as it allows the public to report encampments online and then be kept directly updated on progress. Local authorities can send updates direct to the WCC Gypsy and Traveller Liaison Team who will then update the web site.

3.6. Effort should be made to communicate with key local networks and individuals who can help convey messages on behalf of the responsible agencies, including

elected members. Email, website, social media and direct messaging should be considered, alongside the traditional print and broadcast media as the circumstances dictate, with the aim of maximising the reach of updates. Information updates should be timely, accurate and concise and signpost towards ways in which further feedback can be given.

4. The Law

4.1. Utilising the most relevant and effective legislation for the unauthorised encampment in question is a matter for the lead agency and its legal advisors. The following, though, may help decision makers in determining the best way forward via a legal route. The Police will ultimately have the decision on the use of Police Powers.

- **Common Law** – can be used by the landowner to regain possession of the land; does not require use of a court; enforced by the landowner or private bailiffs; has no sanctions should trespassers return. This option is available to public bodies but government policy discourages its use.
- **Part 55 Civil Procedure Rules** – can only be used by the landowner to regain possession of the land; requires a civil court procedure; possession can be enforced by county court bailiffs; no sanctions should trespassers return unless means have been adopted to identify the persons unknown. Sanctions become unavailable after the 3 month period where the court order is valid expires.
- **Sections 77 – 78 Criminal Justice and Public Order Act 1994** – can only be used by a local authority on land forming part of the Highway, unoccupied land or occupied land without the consent of the occupier; used to remove identified individuals; magistrates court required when those directed do not leave; possession enforced by local authority; return of campers and or their vehicles within three months carries criminal sanctions.
- **Section 60c Criminal Justice and Public order Act 1994.
Brought about by the Police, Crime, Sentencing and Courts Act 2022-
(Residing on land without consent in or with a vehicle).
*A person aged 18 or over resides or intends to reside on land without consent of the occupier of the land;***
 - *They have, or intend to have, at least one vehicle with them on the land;*
 - *They have caused or are likely to cause significant damage, disruption or distress;*
 - *They, without reasonable excuse:*
 - *Fail to leave the land and remove their property following a request to do so by an occupier of the land, their representative or a constable; or*
 - *Enter or, having left, re-enter the land with an intention of residing there without the consent of the occupier of the land, and with an intention to have at least one vehicle with them, within 12 months of a request to leave and remove their property from an occupier of the land, their representative or a constable.*
 - *Reasonable suspicion that a person has committed this offence confers power on a constable to seize their vehicle/other property for up to three months from the date of seizure or, if criminal proceedings are commenced, until the conclusion of those proceedings.*

- **Sections 61 – 62 Criminal Justice and Public Order Act 1994** – Following the PCSC Act 2022 amendments, police are able to use these powers on any land including the highway; to direct that persons leave the land and remove any vehicles they have with them or any other property and a failure to do so or a return to the land within twelve months empowers a police constable to seize and remove that vehicle; it is not only triggered where there are two or more persons trespassing with 6 or more vehicles but can be triggered where there are two or more persons trespassing and that any of those persons trespassing has caused damage to the land or to property on the land or where they have used threatening, abusive, insulting words or behaviour towards the occupier of the land, a member of the occupier's family or an employee or agent of the occupier; does not require the courts; possession enforced by police; return within twelve months –criminal sanctions.
- **Section 62A-E Criminal Justice and Public Order Act 1994** – can be used by a senior police officer to direct 1 or more trespassers to leave land and take any vehicles with them, but where it appears that the trespassers are in possession or control of caravans, there has to be a suitable pitch available on a relevant site before such a direction can be delivered; can be used on any land; is used for identified individuals and or their vehicles; does not require the courts; possession enforced by the police; return to the local authority area within three months – criminal sanctions.
- **Injunction** - Can be drafted to prohibit named individuals from engaging in certain activities or behaviours or protecting vulnerable pieces of land within Districts or Boroughs throughout the County. Some local authorities have obtained or considered this option which if available will be an option where appropriate and proportionate.

4.2. In considering the legal approach decision makers need to be mindful of Article 8 of the Human Rights Act 1998 and being cognisant of the right to respect for private and family life. Decision makers will also need to be mindful of the fact that Gypsy and Travellers are a recognised ethnic group for the purposes of the Equality Act 2010 for which public bodies have a public sector equality duty.

4.3. For more detail on relevant legislation the documents below are recommended reading:-

*Home Office document. Secretary of States Statutory Guidance for Police on Unauthorised Encampments. **June 2022.***

5. Data Protection

5.1. All information sharing commitments as made under the Protocol will be compliant with GDPR and within the parameters of the Data Protection Act 1998 and any future amendments to the Act. It is for the agency sharing information to satisfy itself of that accordingly.

6. Post-Incident Debriefing

6.1. Following the departure of the encampment, within 48 hours a debriefing meeting should be held by the lead agency. This meeting could be virtual, or by way of telephone/video conference. It is very important that information reflecting what went well, not so well and any lessons learnt is documented. Constant improvement in

dealing with unauthorised encampments and information sharing will be golden threads of the debriefing process.

6.2. Whilst action around unauthorised encampments is not at all designed to criminalise any members of the Gypsy and Traveller communities – law breaking will not be tolerated. In that respect as part of the debriefing process it is important the police document and appropriately share information and intelligence in respect of any criminal aspects of the encampment. The police will also utilise the information and intelligence gathered to help build up a picture of the problem across the County and Region. This will help ensure agencies are intelligence led going forward and best placed to make good decisions and use of resources to deal with the challenges posed.

7. Summary

7.1. In summary this protocol seeks to bring cohesion, consistency and sustainable effectiveness to the challenge of dealing with unauthorised encampments. It is absolutely recognised that such encampments can have a very significant and adverse impact on settled communities. Whilst consistent, positive and effective response is imperative it will be in a context of justification, proportionality, legality and absolute necessity. Negotiation should always prevail over any inclination for confrontation. However, criminal behaviour will not be tolerated whether within or outside of the encampment. It is an expectation of this protocol that the police will robustly gather information and intelligence and utilise it positively to neutralise any criminal behaviours.

7.2. The longer term sustainable solutions to unauthorised encampments go beyond the scope of this protocol and probably lie within the realm of national and local government planning and housing strategies. Warwickshire will contribute to the bigger conversation both on a regional and national basis as it is fully recognised and accepted that a wider collaborative approach is needed as part of the overall strategy.

8. Review

8.1. This protocol document that was initially created in 2017 was last reviewed and updated in January 2023 to incorporate the new strengthened Police powers that came into force on 28th June 2022 under the Police Crime, Sentencing and Courts act 2022 and amendments to the Criminal Justice and Public Order Act 1994.

The protocol will be reviewed every 24 months.

The below parties have agreed to work together in accordance with the Warwickshire Protocol. There are designated representatives from all represented partner agencies to assist in ensuring consistency in Warwickshire approach.

The Protocol is currently owned by Warwickshire County Council Gypsy Traveller Services.

| Protocol Owner | Reviewing Officer | Date of last review | Next Review date |
|-----------------------------|---|---------------------|------------------|
| Warwickshire County Council | Martin Rone-Clarke Gypsy Traveller Liaison Advisor Warwickshire Police. | Jan 2023 | Jan 2025 |
| Warwickshire County Council | Martin Rone-Clarke Gypsy Traveller Liaison | Sept 2025 | Sept 2027 |

| | | | |
|--|------------------------------|--|--|
| | Advisor Warwickshire Police. | | |
|--|------------------------------|--|--|

Appendix 1: Tactical and Operational leads for use of the Protocol

| Organisation | Contact; Role; | Phone | E mail |
|--|--|---|--|
| Warwickshire Police and Crime Commissioner | Richard Long Head of Policy and Partnerships | 01926734649 | Richard.Long@warwickshire.police.uk |
| Warwickshire County Council | Leon Livermore Head of Trading Standards and Community Safety | 01926418127 | leonlivermore@warwickshire.gov.uk |
| Warwickshire Police | Martin Rone-Clarke ; Gypsy Traveller Liaison/Advisor. | 07768537483 | Martin.rone-clarke1@warwickshire.police.uk |
| North Warwickshire Borough Council | Ryan Lee-Wilkes Principal Planning Enforcement Officer. Dorothy Barratt Forward Planning & Economic Development Manager | 01827719290 01827719250 07909094494 | RyanLee-Wilkes@NorthWarks.gov.uk dorothybarratt@northwarks.co.uk |
| Nuneaton and Bedworth Borough Council | Sharon Clinton Assistant Director for Strategic Housing. Doreen Katusiime, Private Sector Housing Manager | 02476376121 02476376120 | sharon.clinton@nuneatonandbedworth.gov.uk Doreen.Katusiime@nuneatonandbedworth.gov.uk |

| | | | |
|---------------------------------------|---|----------------------------|--|
| | | | |
| Rugby Borough Council | David Burrows Chief Officer - Regulation and Safety | 01788533806 | David.burrows@rugby.gov.uk |
| | Paul Pritchett Environmental Health & Community Safety Manager | 01788533607 | Paul.pritchett@rugby.gov.uk |
| Warwick District Council | Ian Jackson Senior Housing Standards Officer | 01926456732 | ian.jackson@warwickdc.gov.uk |
| | Joanne Watson Senior Environmental Health Officer | 01926456726 07803203721 | Joanne.watson@warwickdc.gov.uk |
| Stratford-upon-Avon District Council | Julie Lewis Head of Environmental and Neighbourhood Services | 07773096687 | Julie.Lewis@stratford-dc.gov.uk |
| | Sam Slemensek. Community safety manager | 07854717447 | Sam.Slemensek@stratford-dc.gov.uk |
| Warwickshire Fire and Rescue Service. | Moreno Francoiso Fire Prevention and Arson manager | 07970985720 | morenofrancioso@warwickshire.gov.uk |

Appendix 2: Notification to Authorities of an Unauthorised Encampment

Experience to do date shows that in the vast majority of instances when an unauthorised encampment is reported, the police are the first to be notified. Warwickshire Police commence an 'Initial Site Assessment Form'. Warwickshire Police will utilise the form to convey the following information to the relevant authorities:

- Date of arrival of travellers
- Address and location of encampment
- Land ownership
- Number of units and vehicles
- Profile of encampment e.g. numbers of families; business activities;
- Associated equipment/effects; presence of animals
- Intended departure date
- Immediate problems/welfare issues
- Contact details

It is then expected that the relevant data recording in line with GDPR is created for the unauthorised encampment and will be utilised by the lead agency.

Appendix 3: Site Code of Conduct



Unauthorised Encampments

Code of Conduct

To ensure those members of the settled and gypsy and travelling communities can live together in a peaceful and unprejudiced way we expect you to comply with this Code of Conduct. We expect you to treat the land you have occupied with respect, and that you respect the rights and freedoms of other people who also wish to use the area.

Behaviour that may result in your eviction from a site includes the following:

- Camping upon any land designated as a public amenity, such as parks, recreation areas, school fields and similar locations - this is not an exhaustive list.
- Interfering with the rights and freedoms of other members of the public, including interrupting the operation of legitimate businesses.
- Forcing entry to land, by causing damage to any fixtures, fittings or landscaping (including planted areas). This includes digging away of earthwork defences, which have been placed at landowner's expense to prevent trespass.
- Causing any other damage to the land itself, or property on it. Particular care should be taken not to cause damage to those features provided as public amenities.
- Driving vehicles along any footpath, or other highway not specifically designed for road vehicles. This practice is not only unlawful but is also highly dangerous.
- Parking vehicles or caravans on any road, footpath or other highway that causes an obstruction to other people wanting to pass by. This includes parking immediately next to footpaths.
- Burning, dumping or tipping rubbish, waste materials or trade waste such as tree cuttings, rubble, etc. It is your responsibility to keep the site clean and tidy. Council Traveller Liaison Officers can direct you to Civic Amenity Sites (Council Tips) where you will be able to pay to dispose of trade waste.
- Using the area for open toileting. You must NOT deposit or leave human waste in or near this unauthorised encampment area.
- Abuse, intimidation or harassment of any person who is lawfully using the area.
- Excessive noise or other forms of anti-social behaviour especially after 10pm and before 7am.
- Animals that are not kept under control (including dogs fouling public places) or that attack persons lawfully on the land or nearby.
- Interference with electrical, water or gas supplies. Any person(s) found abstracting electricity, or wasting quantities of water may be subject of criminal proceedings.

These principles are the same standards of behaviour that are expected of the settled community. Warwickshire Police are committed to ensuring that all policing issues that affect you are balanced; however behaviour that is deemed unacceptable within society will not be tolerated.

Appendix 4: Guidance Notes

The above Code of Conduct has been successfully used by Warwickshire Police in recent times and it is proposed this document will be suitable for the foreseeable future. Even though the police are not the lead agency in the main, it seems practical for them to continue serving the Code of Conduct on initially attending the site having received the report of the encampment. The following notes are provided to help give guidance to the use of and interpretation of the Code:

- (a). The purpose of this Code of Conduct is to build relationships between all relevant parties and encourage good social behaviours by members of the encampment. Active compliance and cooperation with this code and respect for the site and its neighbours is essential. It should be noted, however, that the literacy skills of members of unauthorised encampments can be varied. It cannot be assumed that by physically serving the Code, the process is complete. Verbal explanation should be provided.
- (b). Active compliance does not mean that the members of the encampment will automatically be offered a tolerated trespass arrangement. The period of stay will be determined by the land owner. It should be made clear that the failure to follow the Code of Conduct could result in enforcement action against any and all individuals.
- (c). Enforcement may include the use of Community Protection Notices. These notices were introduced under the Anti-Social Behaviour, Crime & Policing Act 2014 to stop businesses, organisations or individuals over the age of 16 from committing anti-social behaviour which spoils the communities' quality of life. They can be used to deal with most problems or nuisances which negatively impact on or affect the community, by targeting those responsible.
- (d). Evidenced breaches of the issued Code of Conduct may also change the initial response to the encampment and necessitate a revised course of action.
- (e). The lead agency may give consideration to the installation of temporary bins and toilets. Such measures could lead to cost savings in the longer term. However, it is fully recognised this is a decision for each local authority dependent on a range of local policy and cost recovery fact.
- (f). Damage to property or the environment will not be tolerated. However, Warwickshire Fire

and Rescue Service may, dependant on location and circumstances, deem small camp fires as acceptable and safe. Costs for remedying any damage caused should be paid by the group or will lead to eviction from the affected site and all future sites.

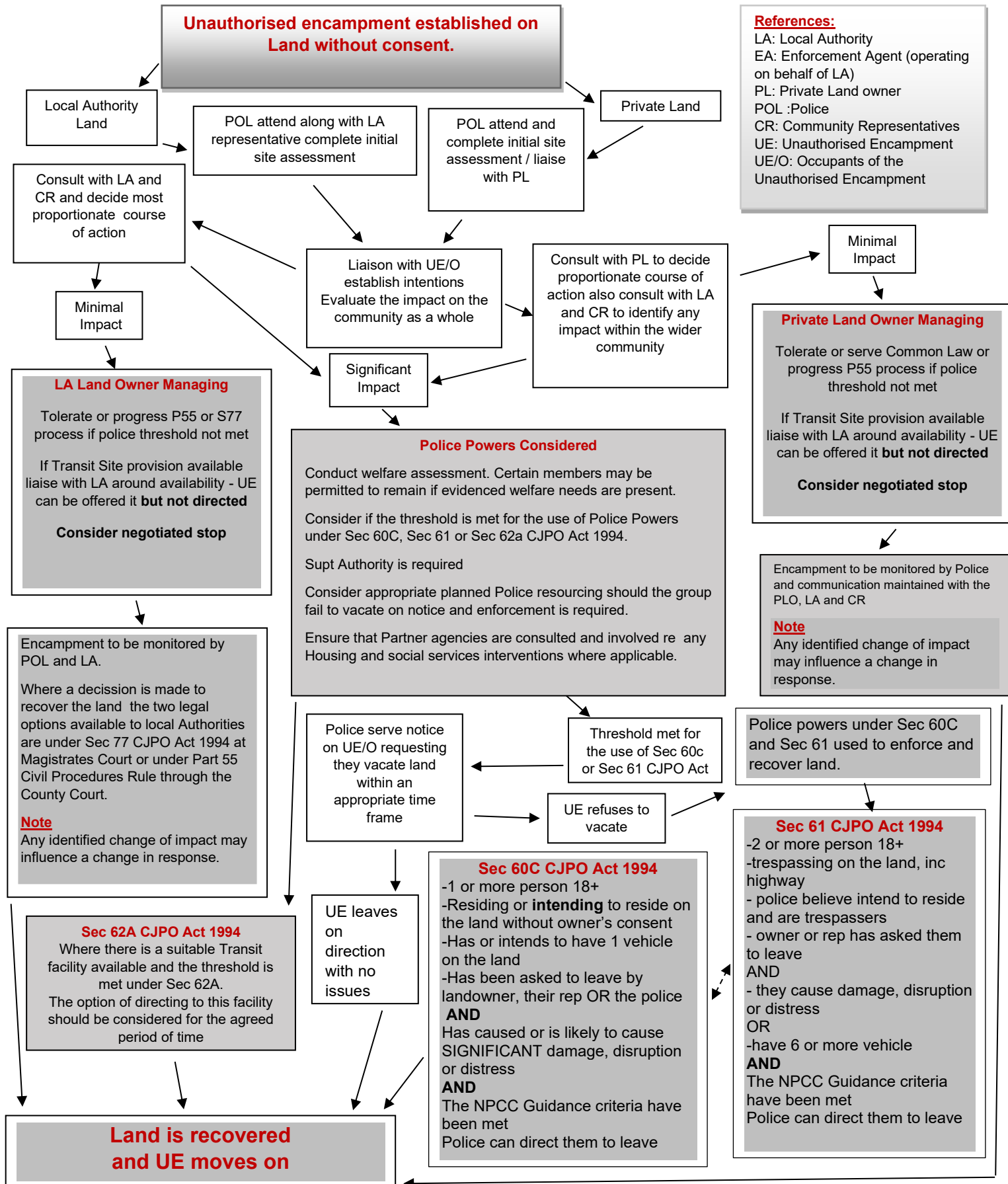
(g). Any allegations of criminal behaviour will be reported to the police

Appendix 5: Information Sharing Meeting Checklist

In undertaking a full assessment of the unauthorised encampment it is recommended that the following topics, as a minimum, are considered in order to achieve a good and comprehensive decision making process. This list is not definitive and decision makers should consider all issues they believe to be relevant in the context of the particular unauthorised encampment that is being considered:

- In relation to the location of encampment – has ownership of the land been confirmed? Has the lead agency been established?
- Is there any particular sensitivity or risks in relation to the site? The level and type of complaints received; associated political issues and pressures may have to be taken into consideration.
- Any significant nuisance related to use of site? e.g. burning of fires/rubbish/ incorrect or illegal disposal of waste materials.
- Any damage to any surrounding properties or places occurred due to the setting up of the encampment?
- Are there stray animals of any description related to the encampment causing public nuisance.
- Are there any safety implications related to site in particular public health issues?
- Are there any relevant planning permissions associated with site?
- What are the travel intentions of the encampment?
- Are any members of the encampment presenting with any welfare issues in relation to health, safeguarding or vulnerability?
- Are there any education requirements to be considered?
- What are the actual numbers of people and vehicles involved with the encampment? Have details been documented where appropriate?
- Has the encampment Code of Conduct been served? Is there any evidence of breach or non-compliance?
- If there are breaches should the police be considering utilising powers under Sections 60c, 61 and 62A of the Criminal Justice and Public Order Act 1994 and amendments under the Police, Crime Sentencing and Courts Act 2022.

Appendix 6: Process Flow Charts.



**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: QB-2019-000616

B E T W E E N :

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

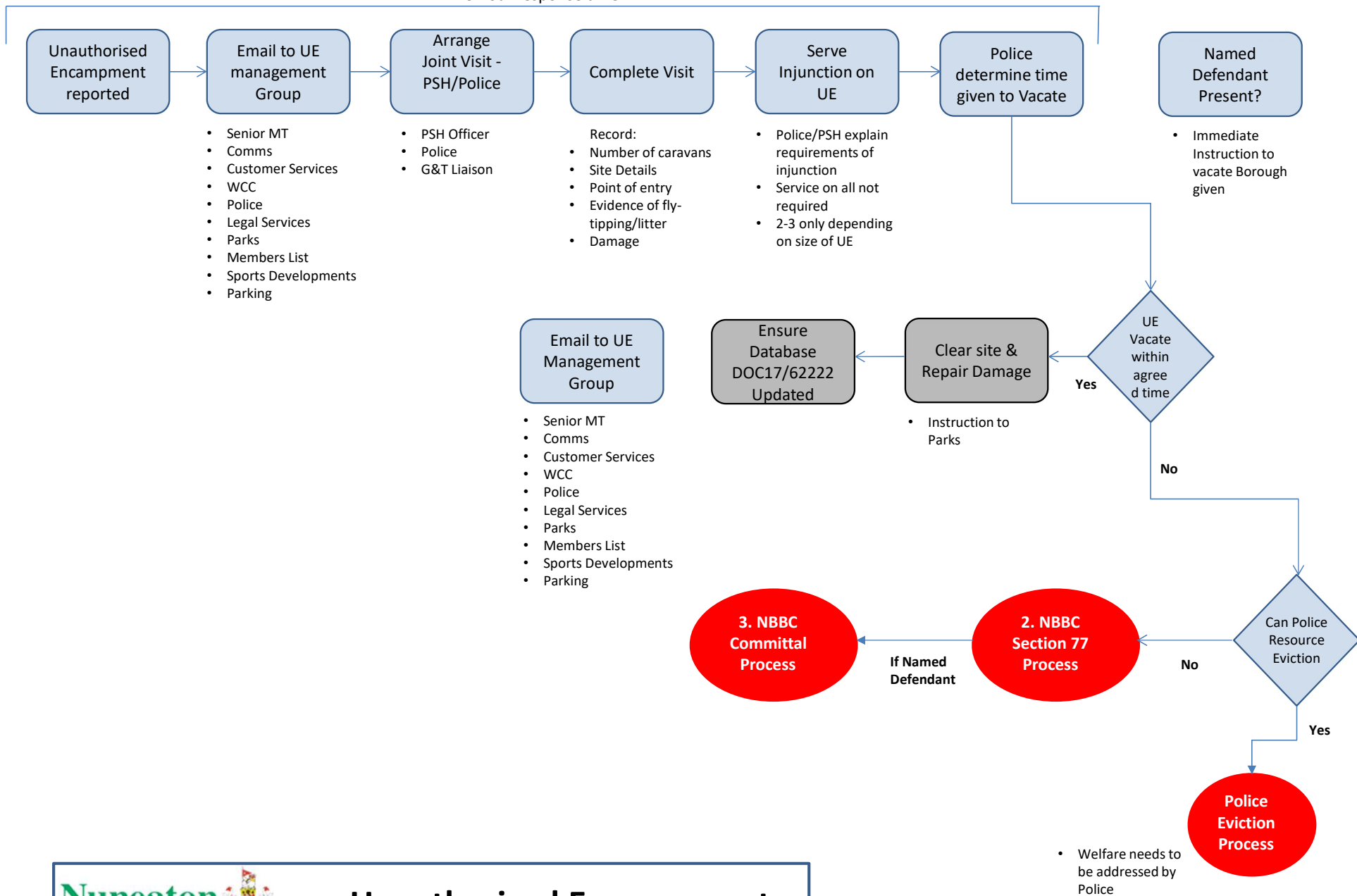
Claimants

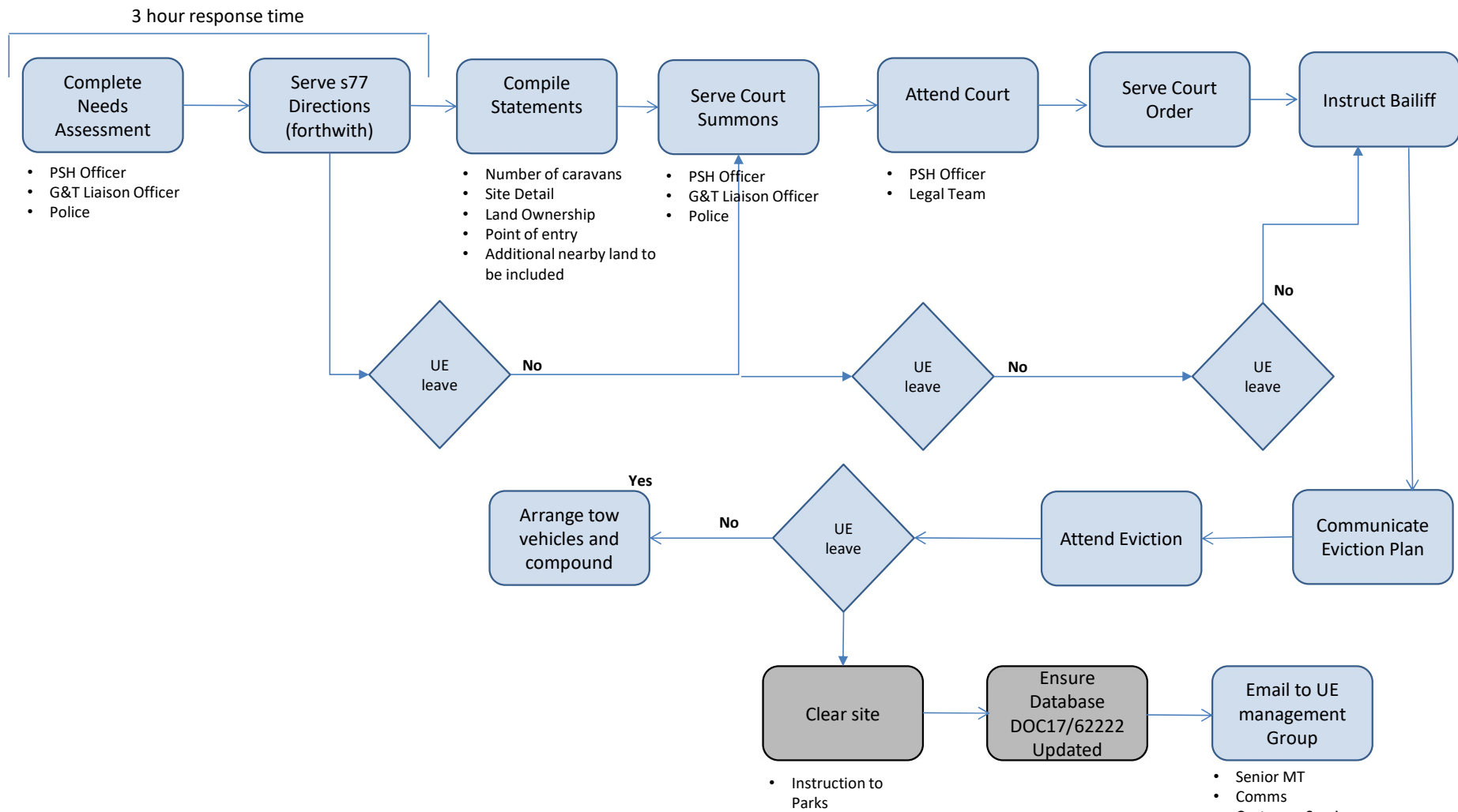
– and –

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

Defendants

Exhibit 'AP1/4'





**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: QB-2019-000616

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP1/5'

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

The Honourable Mr Justice Nicklin
24 May 2021

B E T W E E N:

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

-and-

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

-and-

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



Claimants

QB-2019-000616

Defendants

Interveners

ORDER

UPON THE COURT having handed down judgment on 12 May 2021 ([2021] EWHC 1201 (QB))

AND UPON HEARING Caroline Bolton and Natalie Pratt of Counsel for the Claimants; Marc Willers QC and Owen Greenhall and Tessa Buchanan of Counsel for the Interveners; and Sarah Wilkinson of Counsel as Advocate to the Court

AND UPON all applications consequent upon judgment (including any application for permission to appeal) having been adjourned until 24 May 2021

IT IS ORDERED that:

1. The power of arrest contained in the interim injunction dated 19 March 2019 ("the Injunction Order") is discharged as against the 54th Defendant "Persons Unknown".

2. The Claimants must

- a. by 4.30pm on Monday 7 June 2020, remove every copy of the Injunction Order that has been posted or displayed by the Claimants; and
- b. by 4.30pm on Tuesday 1 June 2020, place a notice on each Claimant's website giving notice that the Injunction Order has been discharged.

The Claimants may replace the Injunction Order with a revised copy of the injunction with the power of arrest removed as against the 54th Defendant "Persons Unknown".

3. By 4.30pm on Monday 14 June 2021, the Claimants must file a witness statement confirming compliance with Paragraph 2 of this Order.
4. Of its own motion, the Court will consider whether to discharge the Injunction Order on the grounds that, having been granted an interim injunction, the failure by the Claimants to progress the claim to a final hearing is an abuse of process ("the Abuse of Process Application").
5. By 4.30pm on 5 July 2021, the Claimants must issue, file and serve any Application Notice together with evidence in support seeking to add any named defendants to the Claim.
6. The Abuse of Process Application will be heard on 14 July 2021 with a time estimate of ½ day.
7. The Claimants must file and serve any further evidence upon which it wishes to rely in relation to the Abuse of Process Application by 4.30pm on 5 July 2021.
8. The Claimants must serve a copy of this Order upon the 1st to 53rd Defendants.
9. No order as to costs.

24 May 2021

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION**

Claim No: QB-2019-000616

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit ‘AP1/6’

January 2025 - September 2025

| T | TT | TransNo | # | Trans.date | Period | Account | Cost Centre | Cat2 | TC | Text | Amount |
|---|----|---------|------|------------|--------|---------|-------------|------|----|--|------------|
| B | ID | 1535127 | 28 | 16/06/2025 | 202603 | 4401 | DJ10 | | OR | 17th March Aviemore - block out for delivery | £155.00 |
| B | ID | 1535127 | 27 | 16/06/2025 | 202603 | 4401 | DJ10 | | OR | 18th March Aviemore - block back after delivery | £155.00 |
| B | ID | 1535127 | 24 | 16/06/2025 | 202603 | 4401 | DJ10 | | OR | 1st Feb Attleborough Rec - moved block for Rail access | £155.00 |
| B | ID | 1535656 | 211 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | 1st May - blocks out at Heritage Centre | £155.00 |
| B | ID | 1534236 | 3003 | 14/02/2025 | 202511 | 4401 | DJ10 | | OR | 1st November 2024 block move | £155.00 |
| B | ID | 1535656 | 123 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | 21st July - blocks out at Heritage Centre | £155.00 |
| B | ID | 1535656 | 217 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | 29th May - block back at Attleborough Rec | £155.00 |
| B | ID | 1535656 | 213 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | 4th August - blocks back at Heritage Centre - £155.00 | £155.00 |
| B | ID | 1535656 | 210 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | 5th May - blocks back | £155.00 |
| B | ID | 1534236 | 2999 | 14/02/2025 | 202511 | 4401 | DJ10 | | OR | 5th November 2024 block move | £155.00 |
| B | ID | 1535127 | 26 | 16/06/2025 | 202603 | 4401 | DJ10 | | OR | ADDITIONAL | £610.00 |
| B | ID | 1535656 | 212 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | April 2025 block hire | £765.00 |
| B | ID | 1535656 | 214 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | August hire | £765.00 |
| B | ID | 1534236 | 2995 | 14/02/2025 | 202511 | 4401 | DJ10 | | OR | December 2024 block hire | £765.00 |
| B | ID | 1535127 | 29 | 16/06/2025 | 202603 | 4401 | DJ10 | | OR | February 2025 block hire | £765.00 |
| B | ID | 1535127 | 25 | 16/06/2025 | 202603 | 4401 | DJ10 | | OR | January 2025 block hire | £765.00 |
| B | ID | 1535656 | 215 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | July block hire | £765.00 |
| B | ID | 1535656 | 216 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | June block hire | £765.00 |
| B | ID | 1534560 | 141 | 28/03/2025 | 202601 | 4401 | DJ10 | | E | Local Authority Annual Membership Renewal for 25/26 | £160.00 |
| B | ID | 1535127 | 23 | 16/06/2025 | 202603 | 4401 | DJ10 | | OR | March 2025 block hire | £155.00 |
| B | ID | 1535656 | 218 | 12/09/2025 | 202606 | 4401 | DJ10 | | OR | May 2025 block hire | £765.00 |
| B | ID | 1534236 | 3007 | 14/02/2025 | 202511 | 4401 | DJ10 | | OR | November 2024 block hire | £765.00 |
| B | ID | 1534236 | 2991 | 14/02/2025 | 202511 | 4401 | DJ10 | | OR | October 2024 block hire | £765.00 |
| | | | | | | | | | | | £10,125.00 |

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: QB-2019-000616

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP1/7'



Opening Hours
Mon. - Sat. 08.00 - 22.00
Sun. 10.00 - 16.00





Opening Hours
Mon. - Sat. 08.00 - 22.00
Sun. 10.00 - 16.00

parkingEye
stay max 1 1/2 hours only
Aldi Customers only in store
All day parking £7.00
For full terms & conditions
Please do not park in front of the Aldi store
All parking is subject to 1 1/2 hours
maximum stay (no return within 4 hours)
Paid only within marked bays
Blue badge holders
only in marked bays
Strictly no parking
within loading bays
No parking in front of property
Car park monitored by
ANPR system



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WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH**

Defendants

Exhibit 'AP1/8'

Draft

The Warwickshire Countywide Protocol on Negotiated stopping.

Dealing with Unauthorised Encampments.

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1. Introduction

1.1. Unauthorised encampments continue to be controversial and often will produce negative reactions from the local community. At times this is just merely at the presence of an encampment and before any behaviour, negative or positive can be evaluated. We must understand that although it is evident that some roadside families cause significant disruption to the area and local community, this is not the case for all and there are equally families who are respectful and in need of somewhere to temporarily stay. As professionals sharing information we are able to differentiate between families, identify need and assess the impact on the community as a whole. We are also bound by the Public Sector Equality Duty in accordance with Section 149 Equality Act 2010 which places a responsibility for proactive elimination of discrimination.

1.2. Negotiated stopping is a method of accommodating roadside families in a temporary stay at a suitable location for an agreed period of time. The process is a balanced and humane approach to managing roadside camps, based on a mutual agreement between the local authority and Gypsy and Traveller families. It is a requirement enshrined in case law that Local Authorities do not automatically proceed to enforcement action. In particular, in [*R. \(on the application of Casey\) v Crawley BC \[2006\] EWHC 301 \(Admin\); \[2006\] B.L.G.R. 239*](#) it was set out that careful consideration should be given to whether the Local Authority can:

“Tolerate” the Gypsy and Traveller occupier, if only for a short time, until an alternative site can be found or the occupiers move on voluntarily.

Find an alternative site, if only on a temporary basis and offer the Gypsy or Traveller occupiers the chance to move onto it.

As part of that mutual agreement, matters such as correct waste disposal and basic temporary facilities, sometimes directing Gypsy and Traveller communities away from contentious public spaces to more appropriate council land will be discussed. This approach is proven to achieve significant savings in public spending and decreased social costs for Gypsy and Traveller communities when initiated in parts of the Country.

1.3. Negotiated stopping is an effective means of building trust and confidence and promoting better engagement with service providers to address some of the health and welfare needs that so often are experienced and not dealt with effectively with roadside families. It also offers an opportunity to build community cohesion and proactively make attempts to reduce stereotypical views that are still engrained in society. It will enable an opportunity for partners such as Health and education to engage and offer support to families, it will also through effective community engagement and good management will allow the settled community the opportunity to observe a more representative insight into the Gypsy and Traveller community. It can be evidenced in other parts of the Country that hearts and minds have changed through this productive engagement process. It is anticipated that all relevant partner agencies will be utilised dependant on the identified community requirements.

- 1.4. Negotiated stopping is not an alternative to providing Transit provision. Negotiated stopping can take place on any suitable land identified and should as a minimum requirement allow access to Fresh running water as a basic humanitarian need. Transit provision is a purpose built site for a temporary stay normally not exceeding 28 days and can be used with a booking on facility, as an emergency provision and It also allows Police powers to be considered in the event of an unauthorised encampment under Sec 62 CJPO Act 1994, to direct persons to a more suitable location.
- It is however understood that there are barriers that currently prevent the creation of Transit sites in the County and whilst work is ongoing to facilitate this, Negotiated stopping places provide a solution in some instances to accommodating families who are in need of a stop over provision.
- 1.5. In Warwickshire there are already examples that demonstrated an ability to consider and implement a form of negotiated stopping, a foundation already set that needs building so that where possible successful negotiated stays can be achieved that allow Gypsy and Traveller families to continue in maintaining their lawful nomadic lifestyle. A negotiated stay would normally not exceed 28 days dependant on circumstances. It is anticipated that in the main a Negotiated stay will only be for a short period of time enough to accommodate a specific requirement, this is often just a few days.
- 1.6. Pioneered over a decade ago in Leeds, negotiated stopping was introduced with a practical agreement drawn up between Gypsy and Traveller families, local Authorities and local residents for people to stop on suitable unused land for a specified period of time, this time frame varying dependant on the needs of the family. ([See Appendix 6](#))
- 1.7. There is a need to change the mindset around unauthorised encampments. And instigate lawful action when there is a negative impact from the encampment rather than this being the automatic default that enforcement action is taken against the encampment. It should be noted that such an automatic default at times acts to persecute a way of life and agencies should be mindful to support the needs of families.

2. Initial Action and considerations

- 2.1 In line with the Warwickshire Protocol on Managing unauthorised Encampments. This will include balancing the need to an initial site assessment of all encampments will capture as much information as possible about the occupants of the land, their intended stay time and any Health and Welfare needs. It is also important at an early stage to share any relevant information that is available between professionals including any information about any positive or negative elements for consideration when assessing if Negotiated stopping is an option.
- 2.2 It should be noted that not all families are suitable for operating a negotiated stay and it is important that care is taken to ensure that the agreed stay can be a successful contract that benefits the family and the wider community in building more positive perceptions of the Gypsy, Roma and Traveller (GRT) community and increasing better community cohesion

- 2.3 Relevant and appropriate Information sharing using a Service Level Agreement between relevant agencies in accordance with the Data Protection Act 2018 should take place as soon as practicable to allow the lead agency to decide whether a negotiated stay is feasible and to determine a relevant contract between the land owner/local Authority and the persons permitted to stay for a contracted period.
- 2.4 Consideration by the relevant local Authority along needs to be applied to refuge and waste disposal along with any additional clear up costs as this is an area so often that triggers a negative response from the wider community, effective waste disposal methods put in place can reduce this negativity and often eliminate any subsequent additional clear up cost after the negotiated stay that would have to be met by the Local Authority.
- 2.5 Toilet and wash facilities are often overlooked but are a basic humanitarian need. It is unrealistic to expect any negotiated stay to be successful without ensuring that adequate provisions are in place to cater for this need. The opening of facilities or introducing temporary portable facilities must be provided.
- 2.6 Early on in the planning process of a Negotiated stop any objectives should be set out and detail who will be the lead person overseeing the management of the Stay. This will be the relevant local Authority responsible for that particular area.
- 2.7 Consideration will need to be given to which staff will engage with the family and be a point of contact. This person should be responsible for the site management record and ensuring that it records of all relevant aspects of the negotiated stay.

3. Site Management

- 3.1. It is important to ensure that the applied management strategy is tailored to meet the needs of each specific encampment, being mindful of possible Health, Welfare, Educational or community relations. It is essential that families are not set up to fail and appropriate support is provided. Most negotiated stays will trigger an inquisitive and sceptical local community, It is crucial to maximise the opportunity to enhance relations and build community cohesion.
- 3.2. There may be a place for Police to be involved in the management process but it is important that the Police are not the lead agency for what is effectively a temporary accommodation issue.
- 3.3. Understanding the health needs and often enhanced needs within the GRT community should be an area to invest productive engagement. This could include making use of the opportunity of a temporary period of stay to maximise any support that may be afforded to families with health needs, to include advising, supporting and signposting to relevant agencies and departments. Identified Health and Dental centres are available in Warwickshire to meet the need of roadside families and these should be documented in Appendix 4 and can be provided to families. In addition The established Warwickshire Gypsy Traveller engagement group is made up of a multitude of professionals and is an ideal multi

agency resource able to accommodate the specific Health, Education and Welfare requirements of a negotiated stay.

- 3.4. When addressing Education, maintaining stability in children's Education is challenging for families who wish to travel. Being able to stop safely within an area for a negotiated period of time can allow families to plan their stay and to liaise with schools to help support a better children's education outcomes. Education is an important aspect and there is a need for schools to recognise the importance of travelling with cultural heritage. The Warwickshire Ethnic minority and Traveller achievement service part of Warwickshire County Council would be able to play a part in ensuring that any educational needs are met during this temporary stay.
- 3.5. Having a negotiated agreement in place does not preclude the authority seeking to use its lawful powers to regain possession of the land secure the land. A County Court may approve a possession order against an individual or family, where behaviour has been seen to breach the agreement, rather than a whole group. The contract drawn up and agreed between the Gypsy and Traveller Family and the Local Authority land owner will detail rules for behaviours. It is when these behaviours are evidenced to have been breached and have an adverse impact on the land owner or the wider community that such action may be sought. ([See Appendix 6](#))

4. Contract

- 4.1 It is crucial that a contract made is agreed so that everyone knows what is expected from the stay, the agreement should document the length of stay allowed and the number of permitted vehicles. The contract should reflect the needs of the families occupying the Negotiated Stopping Place and the measures put in place to accommodate that specific need.
- 4.2 Rules should be defined with an explanation around the consequences should these rules be breached to ensure that there is consideration on any impacts that may affect the wider community and the requirement to proportionately cater for the needs of the community as a whole.
- 4.3 Lead agencies are to be mindful of possible reduced literacy skills that may be relevant It is crucial to ensure that the persons occupying the site fully understand the contract to be agreed and this may require an independent professional to explain and act as a witness to any agreement that is subsequently documented.
- 4.4 Waste is always a controversial issue and in order to allow families to make the most of a negotiated stay it is important to ensure that proper waste provision is supplied. It is recommended that this should be in a waste disposal container proper covered bins. Refuge bags alone often can get attacked by animals or impacted by adverse weather conditions out of the control of the occupants.

- 4.5 Negotiated stopping involves local authority officers making an agreement with Gypsies and Travellers on unauthorised encampments. The terms of the agreement can vary depending on the situation but will include matters such as correct waste disposal which can be described as “good neighbourliness”. Provision and use of services, such as portable toilets and household waste disposal should form part of the agreement. Some authorities also supply water where possible. The contract will stipulate the requirement to abide by rules around waste disposal and that breaches of this agreement may result in an early termination of the stay and subsequent action may be taken to recover the land.
- 4.6 The length of the agreement can also vary and would normally not exceed 28 days. The agreement can apply to the land which has been camped on, or if it is unsuitable the local authority can direct the group to an alternative more suitable location where an agreement can be made. There are varying factors that will determine the length of stay. This will be based around the needs of the Gypsy or Traveller families and to accommodate their nomadic right to travel. There will be a balance with any impacts on the local community. It may also be that the need to stay is a relatively short period for example to attend a funeral, wedding or cultural event.

5. Communication

- 5.1 When a decision is made to facilitate a negotiated stop early effective communication with key community representatives is crucial. There will always be concerns through ignorance or stereotypical perceptions that the behaviours of some will be the same for all. Clearly this is not the case.
- 5.2 Early community engagement and reassurance can eliminate unnecessary unwanted negativity and also may put people at ease and allow them to be more open minded to what a temporary stay will bring. It is important that the right community representative is involved, someone who understands the NGS process, purpose and objective.
- 5.3 Merely advising a community that an encampment has been assessed by our multi agency response and in the circumstances an agreed period of stay has been reached and the professionals dealing have confidence that there will be no adverse impact on the local community.
- 5.4 Using elected members and Key Individual Networks (KINS) to feed information into the community, this can be invaluable in trying to reduce the risk of prejudicial responses from communities. Media and social media comments often can instigate a negative response towards the Gypsy and Traveller communities and working closely with Key community representatives may reduce this negative impact.
- 5.5 Ensure that the local community is aware of the regular engagement professionals will have with the families during their stay and the fact that a contract has been agreed and rules laid down that must be followed. It may be beneficial for all parties concerned to be aware that a negotiated stay in no way bestows any legal interest in the land being stopped on. Any breaches of contract permitted to stay may result in legal action being taken to instigate possession being regained earlier than anticipated.

- 5.6 It is equally important to highlight good examples of behaviours and successful negotiated stops. With there constantly being so much negativity towards Gypsies and Travellers in order to build cohesion and change stereotypical opinions a debrief and subsequent positive press communication where the stay has been a success should be considered through respective corporate communications depts.
- 5.7 Any media coverage needs to be monitored to ensure that it is portraying an accurate picture of the negotiated stop.

Appended

- 6 Appendix 1 NSP debrief Form (For design and completion)
- 7 Appendix 2..... Signatories to Protocol (For design and completion)
- 8 Appendix 3..... Tactical and Operational leads for use of the Protocol (For design and completion)
- 9 Appendix 4..... NSP site management record. (Live document during period of stay) (For design and completion)
- 10 Appendix 5..... Health and welfare Information Sheet (For design and completion)
- 11 Appendix 6.....Negotiated Stay contract between the Gypsy and Traveller family and the Land owner.