

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

And

Until and including **17 December 2025**, the 54<sup>th</sup> 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 54<sup>th</sup> 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 54<sup>th</sup> 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 54<sup>th</sup> DEFENDANT (PERSONS UNKNOWN)**

7. The Order against the 54<sup>th</sup> 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 54<sup>th</sup> 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 31<sup>st</sup> December 2024, the said sum being an assessment of a reasonable sum on account of costs.
12. No order as to costs against the 54<sup>th</sup> 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](mailto: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](mailto: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~~

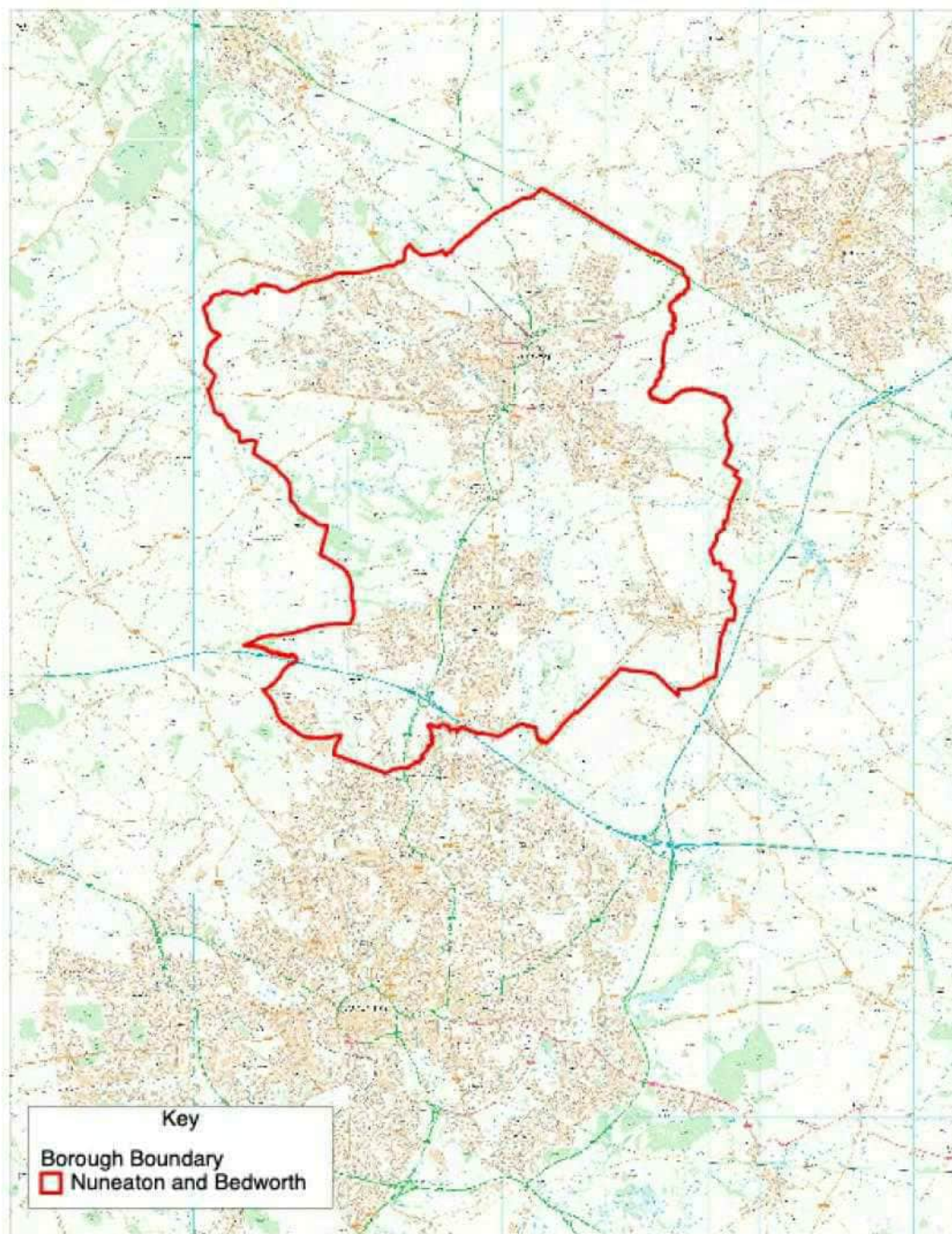
~~(53) — FIONA WARD, No Fixed Abode~~

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



## SCHEDULE 2 – MAP OF THE BOROUGH

## Nuneaton and Bedworth Borough Boundary



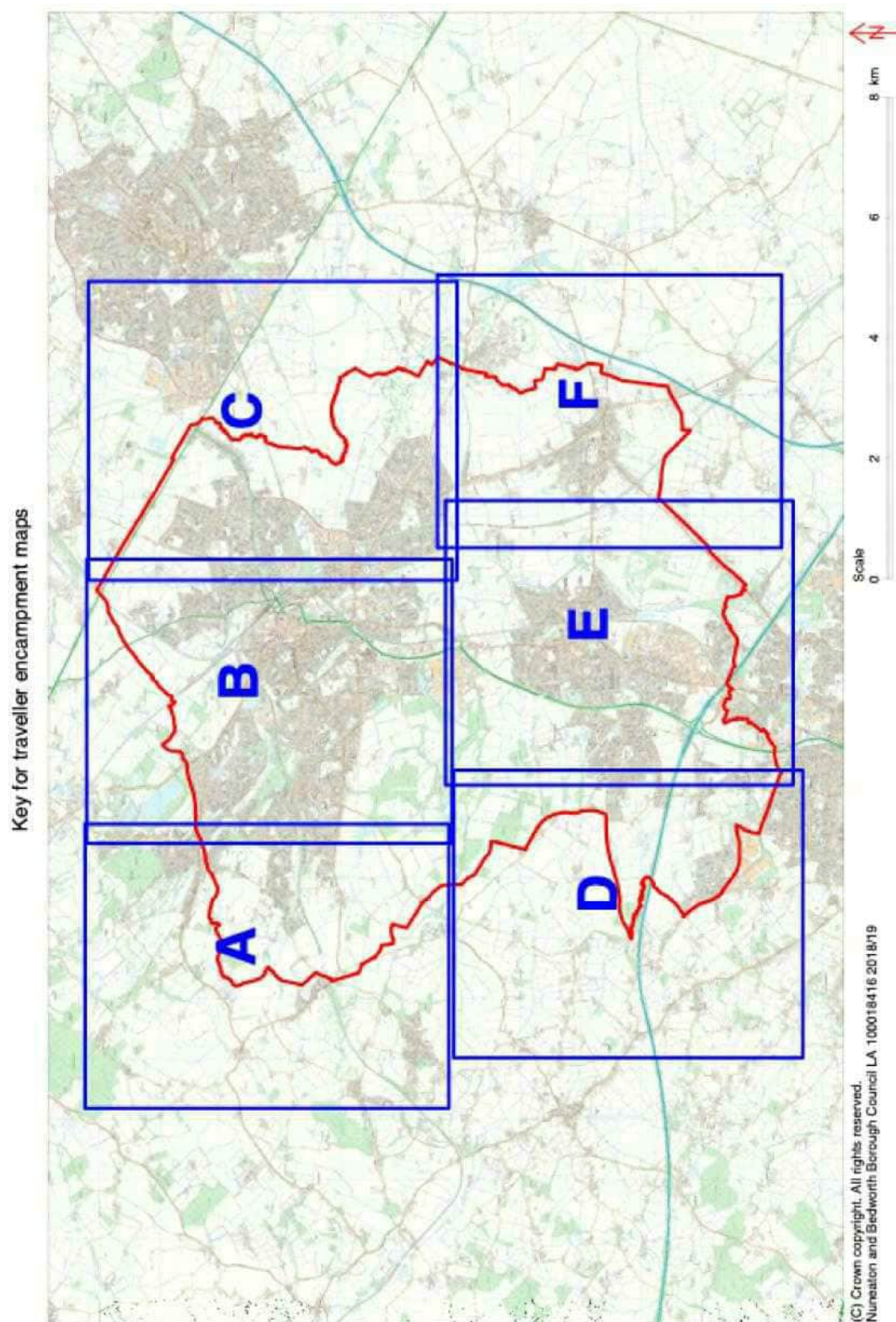
(C) Crown copyright. All rights reserved.  
Nuneaton and Bedworth Borough Council LA  
100018416 2018/19

Not to scale



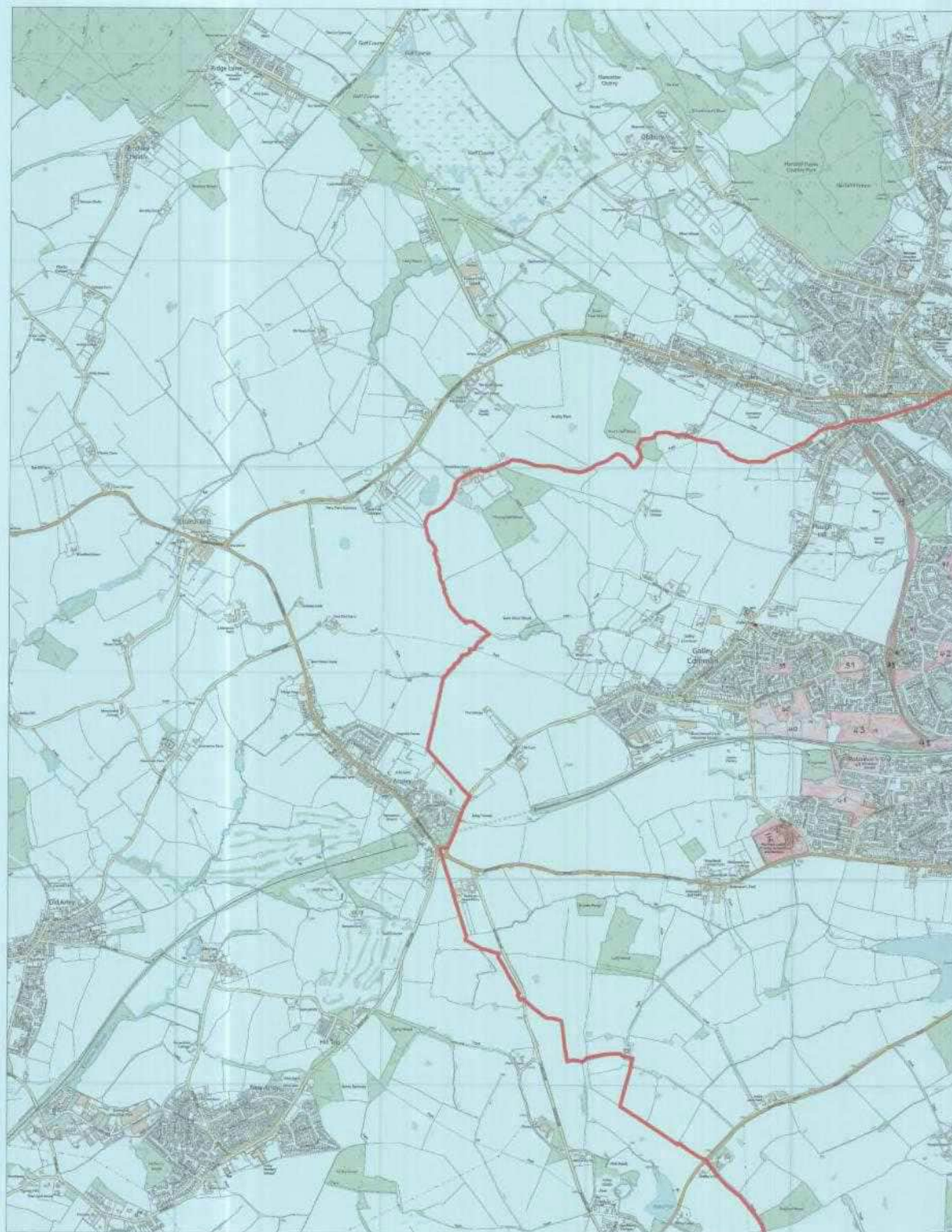


## SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN



A

## Northwest Nuneaton



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

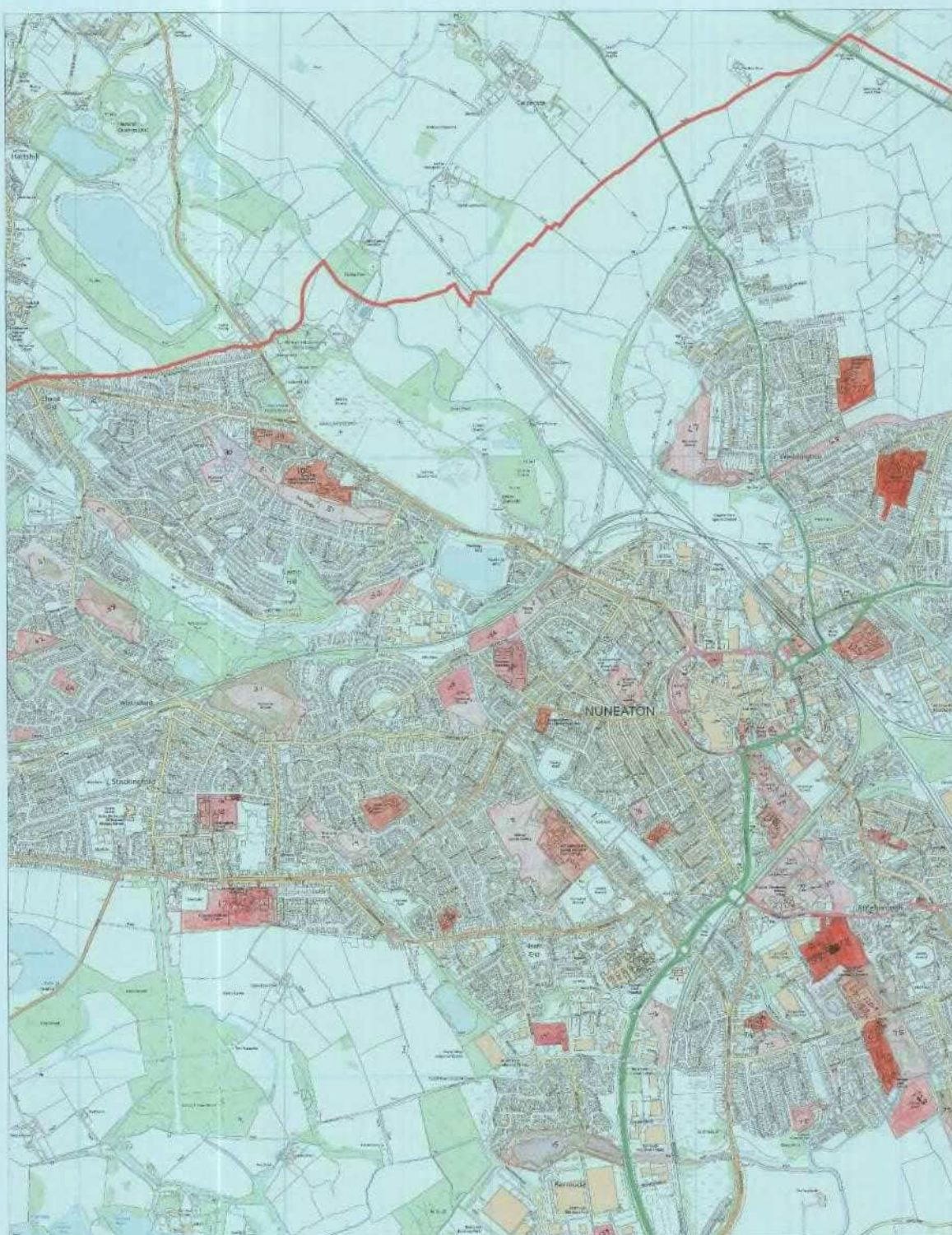
Scale  
0 250 500 750 1000 m





B

## North of Nuneaton



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

Scale  
0 250 500 750 1000 m



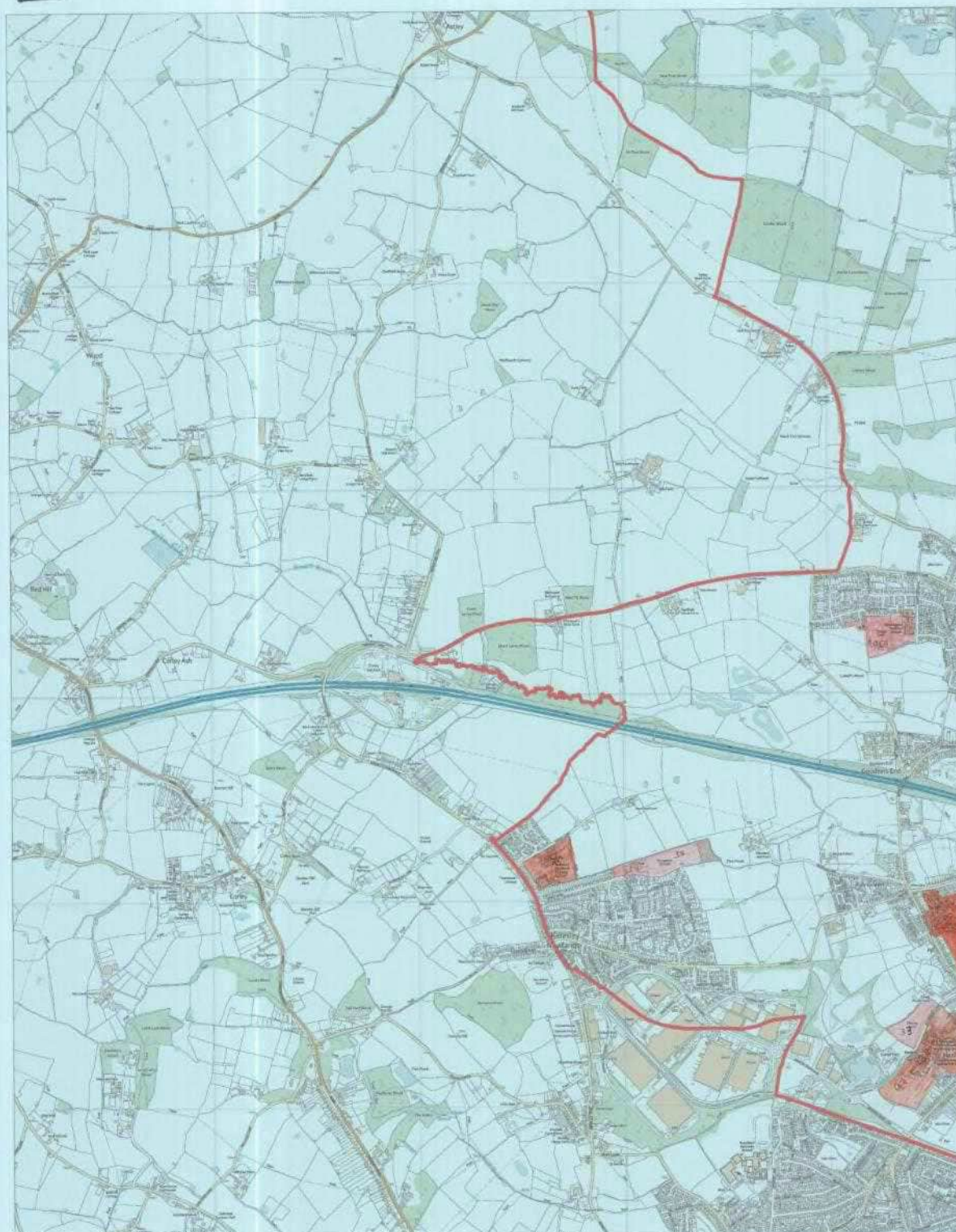






D

## Southwest Bedworth



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

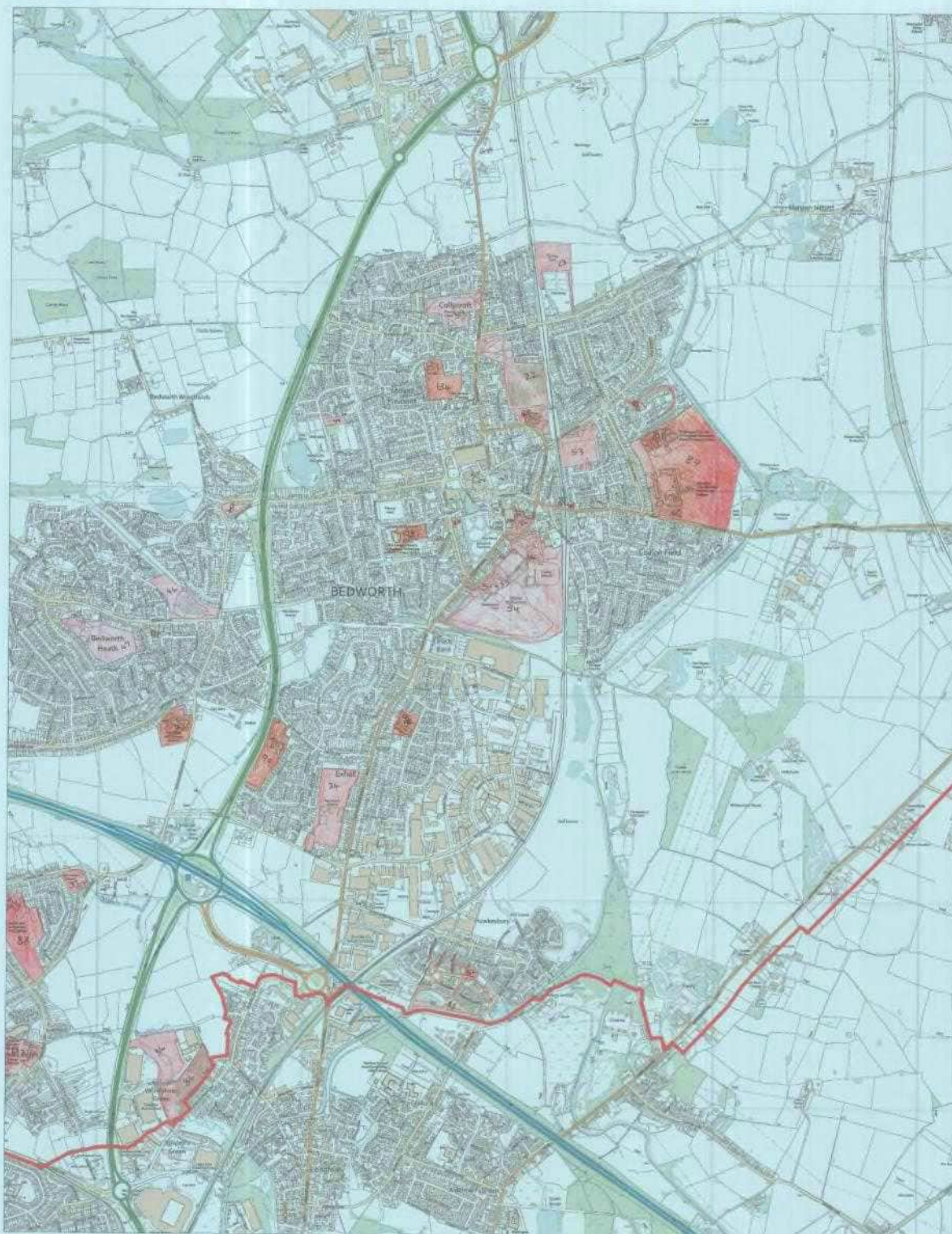
Scale  
0 250 500 750 1000 m





E

## South of Bedworth

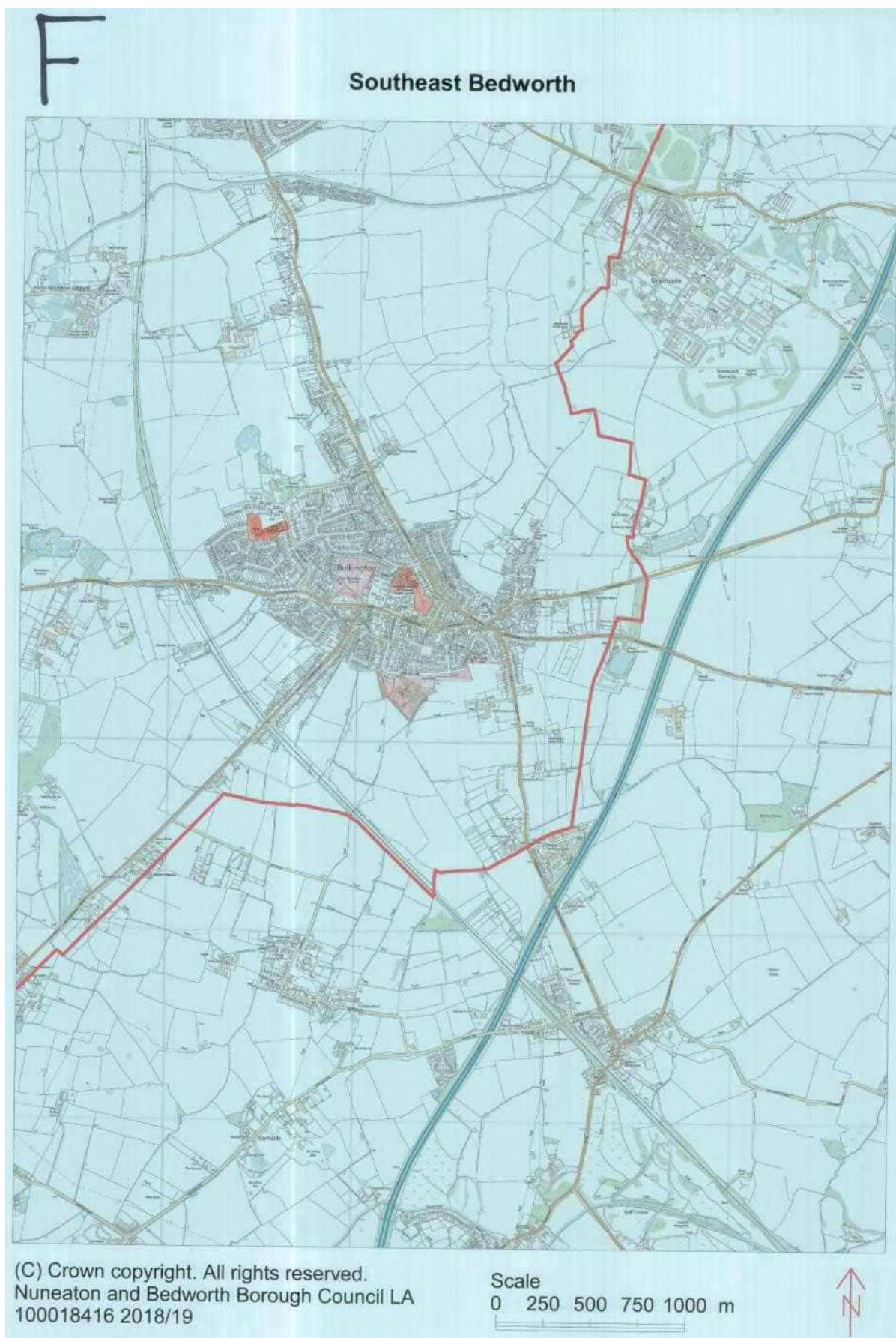


(C) Crown copyright. All rights reserved.  
Nuneaton and Bedworth Borough Council LA  
100018416 2018/19

Scale  
0 250 500 750 1000 m







SITE NUMBER	MAP SITE APPEARS ON	SITE	>5 acres	POSTCODE	Land Owner
1	B	Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS)	x		NBBC
2	B	Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreational Ground/Pool Bank St)	✓	CV11 5PZ	NBBC
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
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
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
6	B	Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street Car Parks 1 and 2)	x	CV11 4BW	Private
7	B	Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car Park)	x	CV11 5DB	NBBC
8	B	Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park)	x	CV11 4BS	Private
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
10	B	Land at Church Street, Nuneaton (aka Church Street Car Park)	x	CV11 4AS	NBBC
11	B	Land and buildings lying to the East of Coton Road (aka Town Hall Car Park)	x	CV11 5AA	NBBC
12	B	Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)	x	CV11 4AL	NBBC
13	B	Land at Coton Road, Nuneaton (aka Riverside Car Park)	x	CV11 5AA	NBBC
14	B	Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park)	x	CV11 5JF	NBBC
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
16	C	Recreation Ground at Easyboro Way, Nuneaton (aka Attleborough Recreational Ground)	✓	CV11 4PY	NBBC
17	C	Land on south side of Lutterworth Road, Nuneaton (aka Pauls Land)	✓	CV11 6QA	NBBC
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
19	B	Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nuneaton (aka Marsdale Drive)	✓		NBBC
20	B	Land at Recreation Ground, Tomkinson Road, Nuneaton	✓	CV10 8DS	NBBC
21	B	Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Haunchwood Road (aka Whittleford Park)	✓	CV10 8PY	NBBC
22	E	Land on the south side of Marston Lane, Nuneaton (aka Bailey Park)	✓	CV12 8DR	NBBC
23	E	Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)	✓		NBBC
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



25	E	Park Road (Car Park) - land on the east side of Park Road, Bedworth	x	CV12 8LH	NBBC
26	F	Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barnacle Lane, Bulkington, Bedworth	✓		NBBC
27	F	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	x	CV12 9RF	NBBC
28	F	Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC
29	B	Land on the south west side of Queen Elizabeth Road, Nuneaton	✓	CV10 9DA	NBBC
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
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
32	B	Land on the south side of Willow Road, Nuneaton	✓		NBBC
33	D	Land on the West side of Blackberry Lane, Bedworth	✓		NBBC
34	E	Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry	✓	CV7 9EX	NBBC
35	D	Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedworth	✓	CV7 8NG	NBBC
36	E	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry (aka Silverstone Drive)	✓		NBBC
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
38	B	Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Marl.)	✓	CV10 9TD	NBBC
39	A	Land south-east of Hickman Road, Galley Common, Nuneaton (aka Chaucer Drive)	✓	CV10 9SD	NBBC
40	A	Nuneaton & North Works Group Riding for Disabled, Valley Road, Galley Common (CV10 9NJ) / land at Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NJ) (aka as Equestrian Centre and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre)	x	CV10 9PZ	NBBC
41	B/A	Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the north east side of Merlin Avenue, south east side of Freeland Rise, Whittleford and land lying to the West of Bucks Hill (aka Freeland Rise)	✓	CV10 9QF	NBBC
42	B/A	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Fernsham Drive/Poplar Tree Farm EA)	✓	~	NBBC
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
44	B	Land on the south side of Sherbourne Avenue, Nuneaton	x	CV10 9JH	NBBC
45	D	Land on the south side of Cardigan Road, Bedworth (aka Anderton Road POS)	✓	CV12 0HD	NBBC
46	E	Land and Buildings at Market End Farm and Orchard Farm, Smorral Lane	✓	CV12 0GE	Private
47	E	Newdigate Recreational Ground - Land at Smorral Lane, Bedworth	✓	CV12 0JP	NBBC
48	A	Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thorntons Way)	✓	CV10 8NN	NBBC
49	A	Kingswood Road Recreational Ground - Land on the North side of Ansley Road, Stockingford	x	CV10 9QG	NBBC
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
51	E	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8NW	NBBC
52	E	Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way)	x	CV6 6TE	Private
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
54	E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	✓	CV12 8JT	NBBC
55	E	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8NN	NBBC
56	E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth	x	CV12 8JT	NBBC

57	E	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth	x	CV12 8JG	NBBC
58	E	Land at Arbury Avenue, Bedworth (aka Arbury Road POS)	x		NBBC
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
60	E	Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road)	x	CV12 0AL	NBBC
61	C	Land lying to the north of Buttermere Avenue, Nuneaton	✓	CV11 6EP	NBBC
62	C	Land at Horseton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton	x		NBBC
63	C	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way	x	CV11 6YB	NBBC
64	C	Recreation Ground, The Long Shoot, Nuneaton, (CV11 6JH)	x	CV11 6JH	NBBC
65	C	Land at Horseton Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Drive/Tavistock Way)	✓	CV11 6YL	NBBC
66	C	Land on the east side of Changebrook Close and land on the west and east side of Pallett Drive, Nuneaton	✓	~	NBBC
67	B	Land on the south side of Church Lane, Nuneaton (Cleaver Gardens/Sandon Fields)	✓	CV10 0HG	NBBC
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
69	B	Land at Bradestone Road, Nuneaton	x		NBBC
70	B	Land on the north side of Donnithorne Avenue, Nuneaton (aka Caldwell Grange)	x		NBBC
71	B	Land on the south side of Avenue Road, Nuneaton (aka Gala Fields)	✓		NBBC
72	B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground)	✓		NBBC
73	B	Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton	x		NBBC
74	B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road, Nuneaton	x	CV11 5PQ	NBBC
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
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
77	B	Riversley Park, Coton Road, Nuneaton	✓	CV11 5TY	NBBC
78	B	Land at Sorrell Road, Nuneaton	✓	CV10 7AW	NBBC
79	B	Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton	x	CV11 5TX	NBBC
80	B	Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park)	✓	CV11 4LX	NBBC
81	C	Crowhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton	✓	CV11 6XA	NBBC
82	B	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton	x	CV11 4PW	NBBC
83	E	Land at Acacia Crescent, Bedworth	x		NBBC
84	B	Land at Dunns Close, Nuneaton	x		NBBC
85	E	Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry)	x		Private
86	C	Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton	x		WCC
87	E	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)	✓	CV12 9EA	WCC
88	D/E	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH)	✓	CV7 9AH	Private
89	E	Race Leys Infant School, Bedworth	x	CV12 8AD	WCC
90	E	Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)	✓	CV12 0HP	WCC
91	E	All Saints Bedworth C of E Primary School and Nursery, Bedworth	x	CV12 9HP	WCC



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

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

N110A

**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 Mulla Creevie Park, Armagh, BT60 4BB~~
- ~~(37) PAT WARD, 333 Mulla Creevie 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 1<sup>st</sup> to 13<sup>th</sup> (inclusive), 15<sup>th</sup> to 17<sup>th</sup> (inclusive), 20<sup>th</sup> to 23<sup>rd</sup> (inclusive), 25<sup>th</sup> to 27<sup>th</sup> (inclusive), 29<sup>th</sup> to 33<sup>rd</sup> (inclusive), 35<sup>th</sup>, 38<sup>th</sup>, 39<sup>th</sup>, 41<sup>st</sup> and 42<sup>nd</sup> Defendants (as set out at Schedule 1 to this Order) (the '**Named Defendants**' hereafter)

And

Until and including **17 December 2025**, the 54<sup>th</sup> 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 54<sup>th</sup> 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'

---

IN THE HIGH COURT OF JUSTICE

Claim Number: QB-2019-000616

QUEEN'S BENCH DIVISION

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

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

On the 19<sup>th</sup> 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 14<sup>th</sup> Defendant Terry Maughan, 28<sup>th</sup> Defendant Simon McDonough, 36<sup>th</sup> Defendant Martin Ward and 37<sup>th</sup> Defendant Pat Ward with liberty to restore.

Until further order, The First to Fifty-Third Defendants (save for the 14<sup>th</sup>, 28<sup>th</sup>, 36<sup>th</sup> and 37<sup>th</sup> 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**



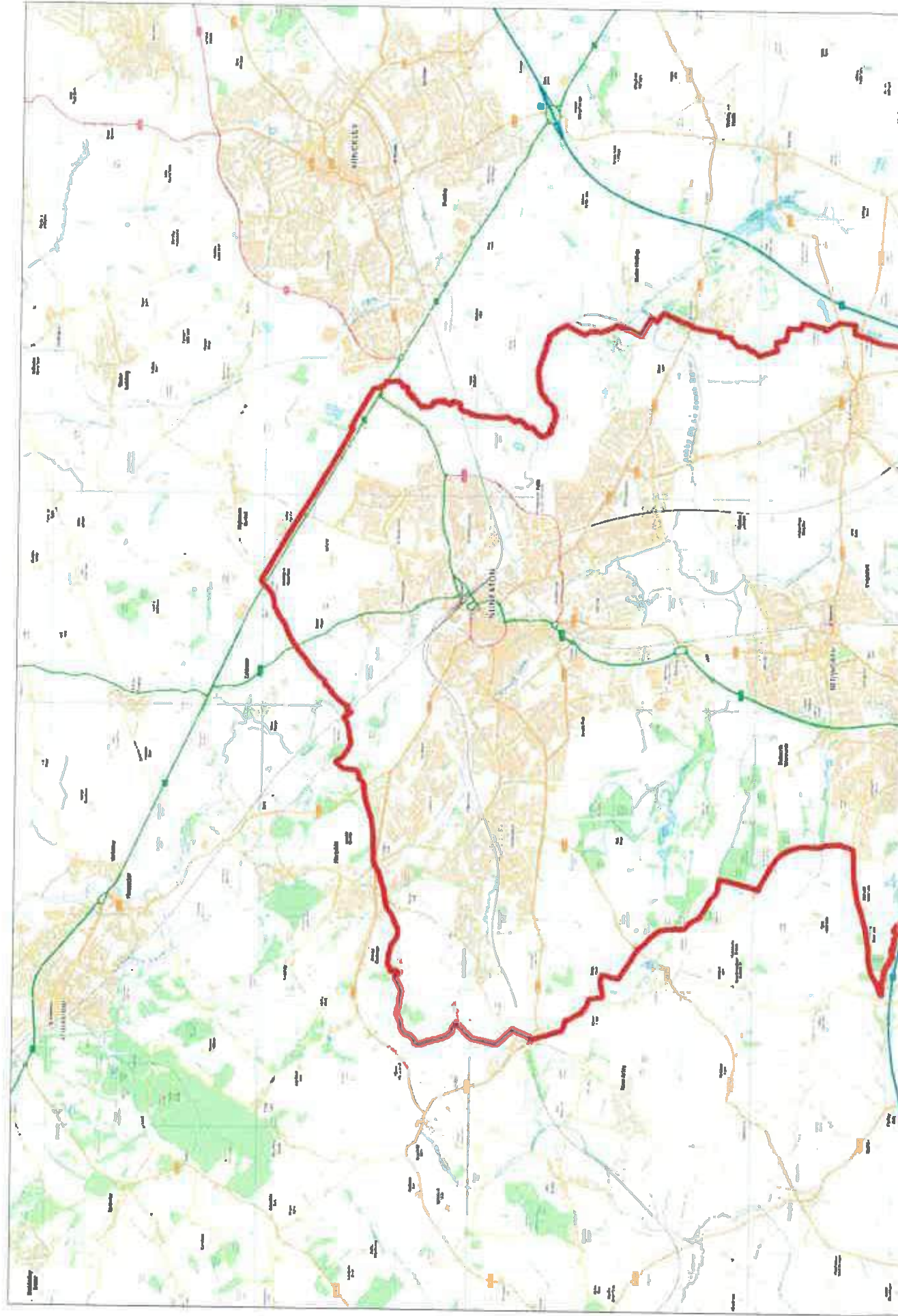
## List of Defendants and their addresses

- (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



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



SITE NUMBER	MAP SITE APPEARS ON	SITE
1 B		Land on the north side of Corporation Street, Nuneaton (aka Abbey Green POS)
2 B		Recreation ground lying to the north of Queens Road, Nuneaton (aka Nuneaton Recreation Bank St)
3 B		Land on the north west of Vernons Lane and land lying to the South West of Midland Road, Stanley Road/Vernons Lane Recreational Ground)
4 B		Land being car park on the south west side of Corporation Street, Nuneaton (aka Upper Ab Park)
5 B		Victoria Street Car Park and 60 Victoria Street, Nuneaton (CV11 5RJ) (aka Victoria Street C
6 B		Joinery works and adjacent premises fronting Regent Street, Nuneaton (aka Regent Street 2)
7 B		Land on the west and east sides of Vicarage Street, Nuneaton (aka Pool Bank Street Car P
8 B		Riversley Park Clinic, Coton Road, Nuneaton, (CV11 5TY)(aka Orchard Street Car Park)
9 B		Land and buildings on the east side of Broad Street, the north side of Queen's Road and th of Abbey Street (aka Abbey Street Car Park)
10 B		Land at Church Street, Nuneaton (aka Church Street Car Park)
11 B		Land and buildings lying to the East of Coton Road (aka Town Hall Car Park)
12 B		Land at Vicarage Street, Nuneaton (aka Justice Walk Car Park)
13 B		Land at Coton Road, Nuneaton (aka Riverside Car Park)
14 B		Meadow Court, Meadow Street, Nuneaton, (CV11 5JE)(aka Meadow Street Car Park)
15 B		Land to the south side of Bermuda/land lying to the east and west of Coventry Road, Chilve the west side of a road leading from Coventry to Nuneaton and a balancing lake and land to Bermuda Road, Nuneaton (aka Bermuda Balancing Lake)
16 C		Recreation Ground at Easyboro Way, Nuneaton (aka Attleborough Recreational Ground)
17 C		Land on south side of Lutterworth Road, Nuneaton (aka Pauls Land)
18 B		Land lying to the north east of Braemer Way, Nuneaton, Land on the south west and north Greenmoor Road & Land lying to the south east side of croft road (aka Jubilee Sports Cent
19 B		Land lying to the east of Westbury Road and Land lying to the North of Herbert Street, Nun Marsdale Drive)
20 B		Land at Recreation Ground, Tomkinson Road, Nuneaton
21 B		Land at Whittleford Park, Haunchwood Road Nuneaton, land lying to the north east of Hau (aka Whittleford Park)
22 E		Land on the south side of Marston Lane, Nuneaton (aka Bailey Park)
23 E		Land on the north side of Marston Lane, Bedworth (aka Marston Lane Recreation Ground)
24 E		Spitalfields 1 and 2 (Car Park) - land lying to the east of High Street Bedworth, land on the Rye Piece Ringway, Bedworth & Zion Chaple, High Street Bedworth
25 E		Park Road (Car Park) - land on the east side of Park Road, Bedworth
26 F		Barnacle Lane EA - land to the south of Barnacle Lane, Bulkington, Bedworth; land at Barn Bulkington, Bedworth

27	F	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth
28	F	Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)
29	B	Land on the south west side of Queen Elizabeth Road, Nuneaton
30	B	Land on south east side of Green Lane, Nuneaton and land lying on the east side of Ramsdell Lane, Nuneaton (aka Stubbs Pool)
31	B	Land and buildings on the east side of Camp Hill Drive, Camp Hill, Nuneaton and land at The Elizabeth Road, Nuneaton (aka The Dingle)
32	B	Land on the south side of Willow Road, Nuneaton
33	D	Land on the West side of Blackberry Lane, Bedworth
34	E	Heckley Recreational Ground - land lying to the north of School Lane, Exhall, Coventry
35	D	Keresley Recreational Ground - Land lying to the North East of Howat Road, Bedworth
36	E	Land lying to the North West of Rowley's Green Lane, Exhall, Coventry (aka Silverstone Drive)
37	E	St. Giles Recreational Ground - Land on the South side of Vicarage Lane, Exhall, Bedworth and the West of St Giles Road, Exhall
38	B	Land on the east side of Bucks Hill, Nuneaton (aka Bucks Hill Marl.)
39	A	Land south-east of Hickman Road, Galley Common, Nuneaton (aka Chaucer Drive)
40	A	Nuneaton & North Warks Group Riding for Disabled, Valley Road, Galley Common (CV10 9JL) and Campbell Close, Nuneaton and land at Galley Common, Nuneaton (CV10 9NJ) (aka as Equine and Fields of the Nuneaton and North Warwickshire Riding for Disabled Centre)
41	B/A	Land on the south west side of Selby Way, land on the north side of Frensham Drive and land on the east side of Merlin Avenue, south east side of Freesland Rise, Whittleford and land lying to the north of Hill (aka Freesland Rise)
42	B/A	Land on the east and west side of Sherbourne Avenue, Whittleford, Nuneaton (aka Fernsham Tree Farm EA)
43	A	Land on Galley Common, Nuneaton; land at Galley Common Nuneaton and Land on the south side of Hill Road, Stockingford (aka North Field)
44	B	Land on the south side of Sherbourne Avenue, Nuneaton
45	D	Land on the south side of Cardigan Road, Bedworth (aka Anderton Road POS)
46	E	Land and Buildings at Market End Farm and Orchard Farm, Smorrall Lane
47	E	Newdigate Recreational Ground - Land at Smorrall Lane, Bedworth
48	A	Land on the North side of Ansley Road, Stockingford (aka Grove Farm/Thornions Way)
49	A	Kingswood Road Recreational Ground - Land on the North side of Ansley Road, Stockingford
50	B	Stockingford Recreational Ground - Land on the west side of Westbury Road, Nuneaton and land on the east side of Grove Road, Nuneaton and land lying to the west of Nuneaton Road
51	E	Bedworth Leisure Centre - Miners Welfare Park, Rye Piece Ringway, Bedworth
52	E	Land lying to the West side of Blackhorse Road, Bedworth (aka Ironbridge Way)
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 Alex Wilson Centre, Johnson Road
54	E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth
55	E	Bedworth Leisure Centre (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth
56	E	Miners Welfare Park (Car Park) - Miners Welfare Park, Rye Piece Ringway, Bedworth
57	E	Bedworth Railway Station (Car Park) - Land on the north side of Bulkington Road, Bedworth
58	E	Land at Arbury Avenue, Bedworth (aka Arbury Road POS)
59	E	Collycroft Recreational Ground - Land lying to the east of Amos Jacques Road, Collycroft, and land lying to the west of Nuneaton Road/Alex Wilson Centre 34 Nuneaton Road Bedworth and land lying to the north of Nuneaton Road
60	E	Land on the north and south sides of Newtown Road, Nuneaton (aka Heath Road)
61	C	Land lying to the north of Buttermere Avenue, Nuneaton

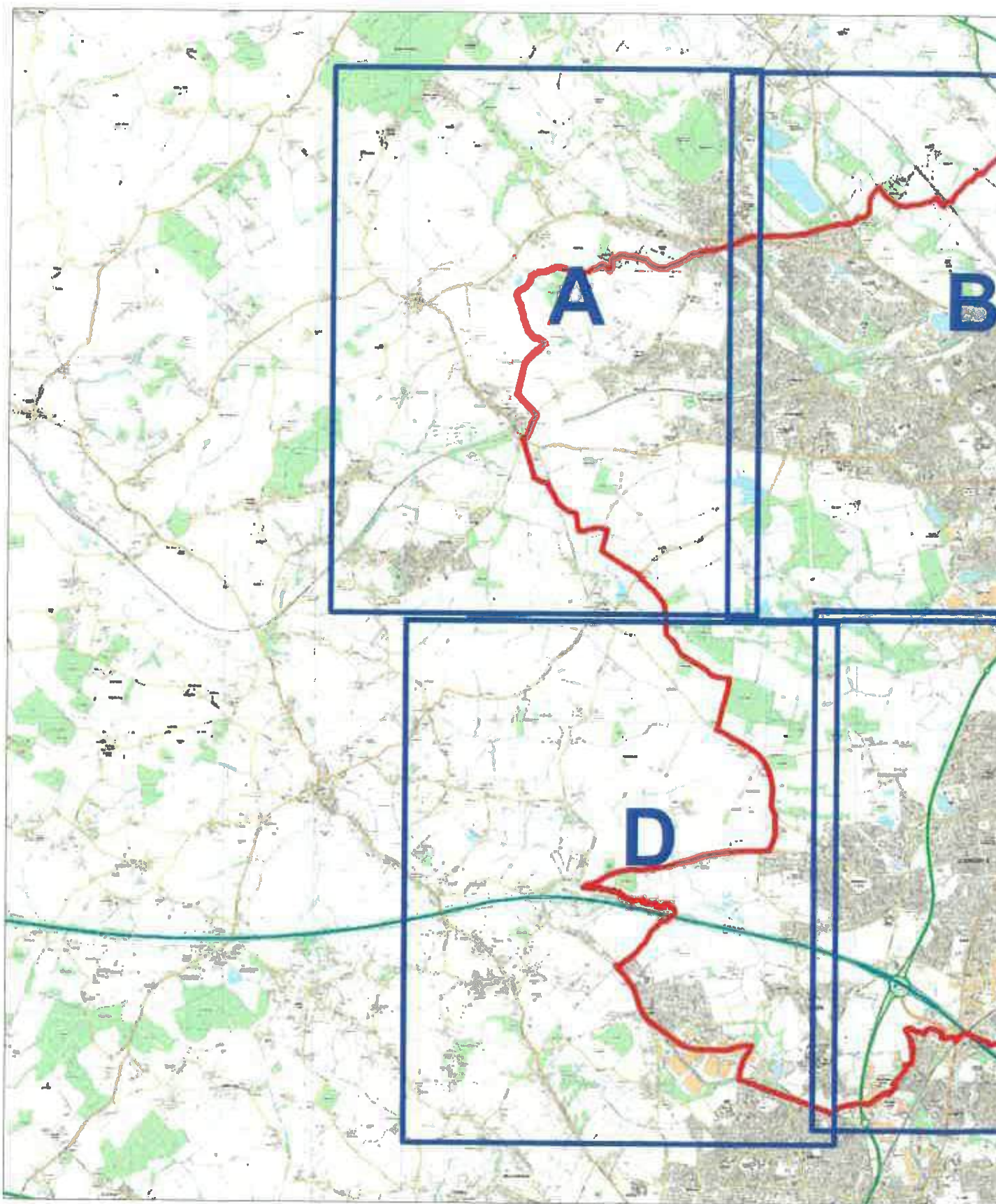


62	C	Land at Horselton Grange, Nuneaton and land lying south and west of Camborne Drive, Nuneaton
63	C	Land lying to the south of Hinckley Road, Nuneaton and land to the west of Clovelly Way
64	C	Recreation Ground, The Long Shoot, Nuneaton, (CV11 6JH)
65	C	Land at Horselton Grange and land to the south of Hinckley Road, Nuneaton (aka Tiverton Way)
66	C	Land on the east side of Changebrook Close and land on the west and east side of Pallett Lane
67	B	Land on the south side of Church Lane, Nuneaton (Cleaver Gardens/Sandon Fields)
68	B	Land on the north side of Brookdale Road, Nuneaton and Land on the North side of Ryde Avenue (aka Coronation Walk)
69	B	Land at Bradestone Road, Nuneaton
70	B	Land on the north side of Donnithorne Avenue, Nuneaton (aka Caldwell Grange)
71	B	Land on the south side of Avenue Road, Nuneaton (aka Gala Fields)
72	B	Land on the north side of Avenue Road, Nuneaton (aka Heritage Centre/Pingles Showground)
73	B	Land on the north side of Donnithorne Avenue, Nuneaton and land at Knebley Crescent, Nuneaton
74	B	Marlborough Road Recreational Ground - Land on the south-west side of Marlborough Road
75	B	Land at Donnithorne Avenue, Nuneaton; land lying to the east of Raveloe Drive, Nuneaton; side of Marston Lane, Nuneaton and Land on the east and west sides of Marston Lane, Nuneaton (Marston Lane Fields)
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
77	B	Riversley Park, Coton Road, Nuneaton
78	B	Land at Sorrell Road, Nuneaton
79	B	Riversley Park (Car Park) - Riversley Park, Coton Road, Nuneaton
80	B	Land on the north side of Avenue Road, Nuneaton (aka Pingles Leisure Centre Car Park)
81	C	Crowhill Recreation Ground - Land lying to the east of Eastboro Way, Nuneaton
82	B	Trinity Court Flats (Car Park) - land on the West side of Highfield Road, Nuneaton
83	E	Land at Acacia Crescent, Bedworth
84	B	Land at Dunns Close, Nuneaton
85	E	Land lying to the West of Blackhorse Road, Bedworth (aka Lymington Drive, Coventry)
86	C	Attleborough Fields Farm, Nuneaton and Land at Slingsby Close, Attleborough Fields Industrial Estate, Nuneaton
87	E	Nicholas Chamberlaine School, Bulkington Road, Bedworth (CV12 9EA)
88	D/E	Ash Green Sports & Arts College, Ash Green Lane, Coventry (CV79AH)
89	E	Race Leys Infant School, Bedworth
90	E	Goodyers End County First School, Bowling Green Lane, Bedworth, (CV12 0HP)
91	E	All Saints Bedworth C of E Primary School and Nursery, Bedworth
92	F	Arden Forest Infant School - aka Land on the West side of Weston Lane, Bulkington, Bedworth
93	E	The Cannons C of E Primary School - aka Land and buildings on the South side of Derwent Lane, Bedworth
94	E	Exhall Cedars Infant School - aka Land lying to the East of Coventry Road, Bedworth
95	D	Keresley Newland Primary Academy and Keresley Newland School, , Grove Lane, Keresley (CV7 8JZ)
96	D	Newdigate Primary School and Nursery - aka Land lying to the South of Smorral Lane, Goodyers End, Bedworth and Land lying to the South of smorral Lane Bedworth
97	D/E	Wheelwright Lane Primary School, Ash Green, Coventry
98	E	St Francis Roman Catholic School, Nicholas Street, Bedworth
"		Land lying to the North of Rye Piece Ringway, Bedworth

	"	Land on the East Side of Nicholas Street, Bedworth
99	E	St Giles Junior School Bedworth - aka Land on the South Side of Hayes Lane, Exhall, Bedworth
100	F	St James Church of England School, Barbridge Road, Bulkington, Bedworth (CV12 9PF)
	"	Playing fields at St. James Church of England Junior School, Barbridge Road, Bulkington, Bedworth (CV12 9PF)
101	E	St Michael's Primary School, Hazel Grove, Bedworth, (CV12 9DA)
	"	Land adjoining St Thomas More Catholic School and Sixth Form College, Greenmoor Road, Nuneaton (CV10 7EX)
102	B	St Thomas More Catholic School, Greenmoor Road, Nuneaton, CV10 7EX
	"	Arbury High School, Greenmoor Road, Nuneaton
103	B	Abbey C of E Infant School, Nuneaton
104	B	All Saints C of E Primary School & Nursery, Knebley Crescent, Nuneaton (CV10 7AT)
105	B	Camp Hill Primary School, aka Land to the South of Tuttle Hill, Camp Hill, Nuneaton
106	C	Chetwynd Junior School, aka Land lying to the South of Gipsy Lane, Nuneaton
107	B	Land at Judkins Quarry Tuttle Hill, Nuneaton (aka Recycling Centre)
108	B	Chilvers Coton Community Infant School, Frank Street, Nuneaton (CV11 5RB)
109	B	Croft Junior School, aka Land lying to the west of Northumberland Avenue, Nuneaton
110	B	Galley Common Infant School, Nuneaton
111	C	Milby Primary School, aka Land lying to the East of Higham Lane, Nuneaton
112	B	Glendale Infant School, aka Land on the south side of Skye Close, Nuneaton
113	B	Middlemarch School, Nuneaton
114	B	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)
	"	Land and buildings on the south side of St Paul's Road, Nuneaton
115	B	Our Lady of the Angels Infant School and St Josephs RC First School at Coton Road, Nuneaton
	"	Our Lady of the Angels Infant School and St Josephs RC First School, Coton Road, Nuneaton
116	A	Park Lane Primary School, Park Lane, Nuneaton (CV10 8LU) and land on the North side of Park Lane, Nuneaton
	"	Land on the North Side of Ansley Road, Nuneaton
117	B	Queens County Junior and Infant School, Bentley Road, Nuneaton, CV11 5LR
118	B	St Pauls C of E Primary School, Nuneaton
119	B	Land at St Anne's RC Primary School, Camp Hill Drive, Nuneaton
	"	St. Anne's Roman Catholic Primary School, Camp Hill Drive, Nuneaton, CV10 OJX
120	B	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH
	"	Oakwood Secondary School, Morris Drive, Nuneaton
	"	Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH
121	C	Playing field adjoining St Nicholas C of E Primary School, Windermere Avenue, Nuneaton
	"	Land on the East Side of Windermere Avenue, Nuneaton
	"	St Nicolas C of E First School, Windermere Avenue, Nuneaton, CV11 6HJ
122	B	Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton
123	B	Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP
124	B	Wembrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton
125	B	Etone College, Leicester Road, Nuneaton, CV11 6AA
126	B	Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ
127	B	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH
128	B	The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton
129	C	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH

130	B	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE
131	E	Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP
132	D	Exhall Grange School and Science College, Wheelwright Lane, Bedworth
	"	Exhall Grange Special School, Wheelwright Lane, Coventry
	"	Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP
133	E	Quest Academy, North Side of Griff Lane, Nuneaton
134	E	Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton
	"	Race Leys Middle School, Barton Road, Bedworth, CV12 8HG
135	B	Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton
	"	Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)
136	C	Whitestone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton
137	B	Attleborough Mills, Attleborough Road, Nuneaton (aka Holman Way)
138	B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton
139	B	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton
140	B	Halfords - land and buildings on the south side of Newtown Road, Nuneaton
141	B	Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre)





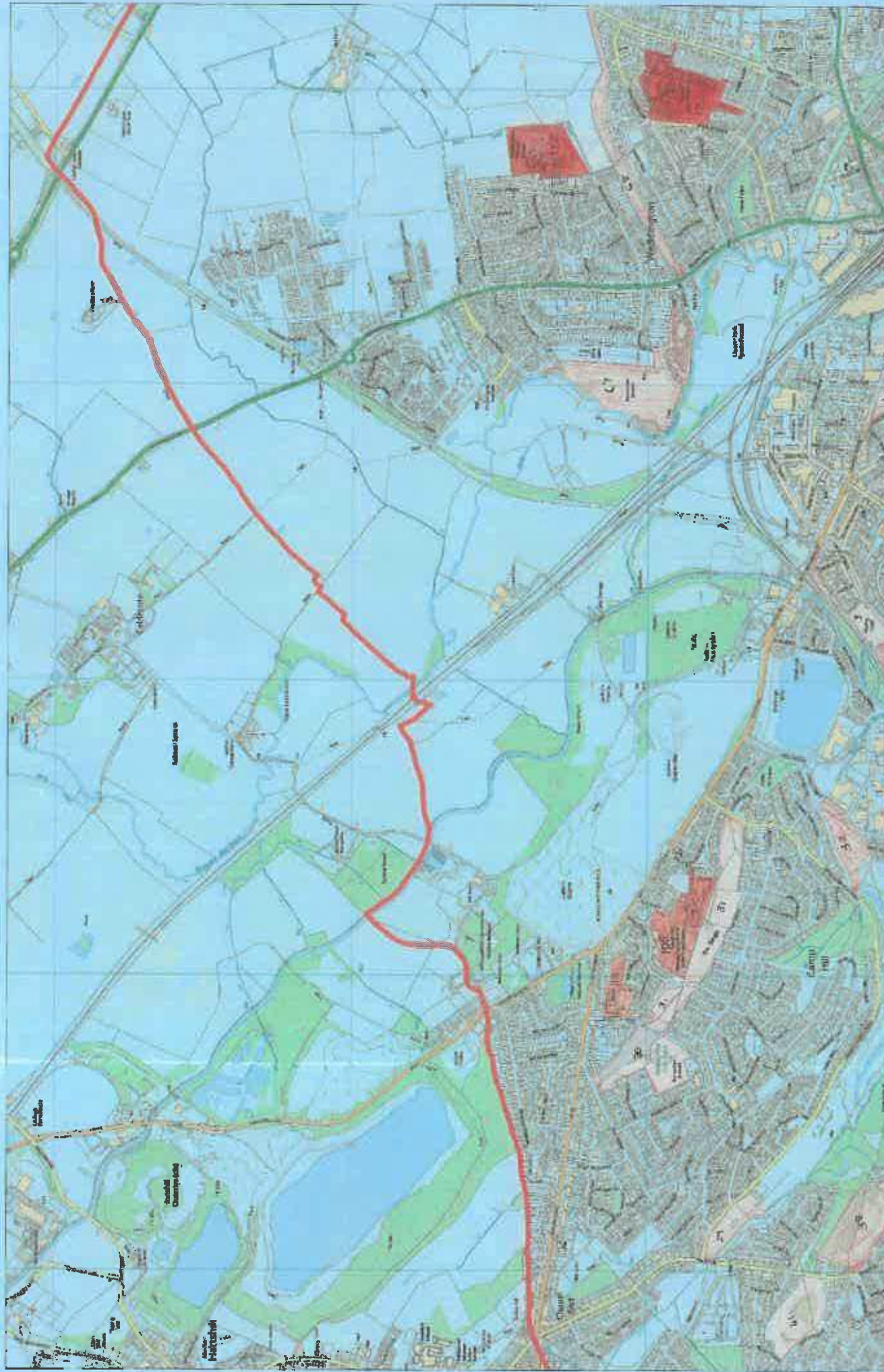


# Northwest Nuneaton



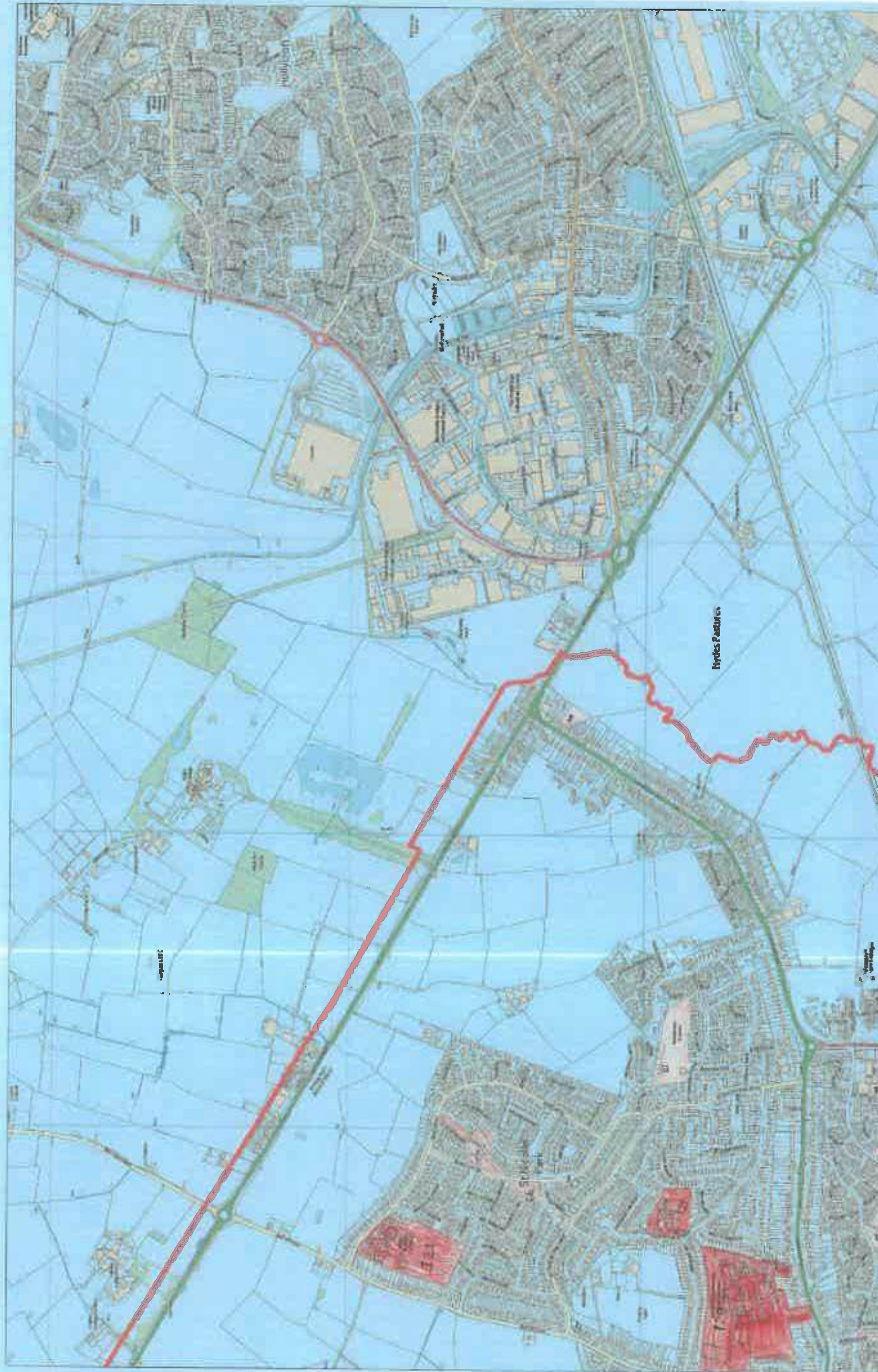


# North of Nuneaton





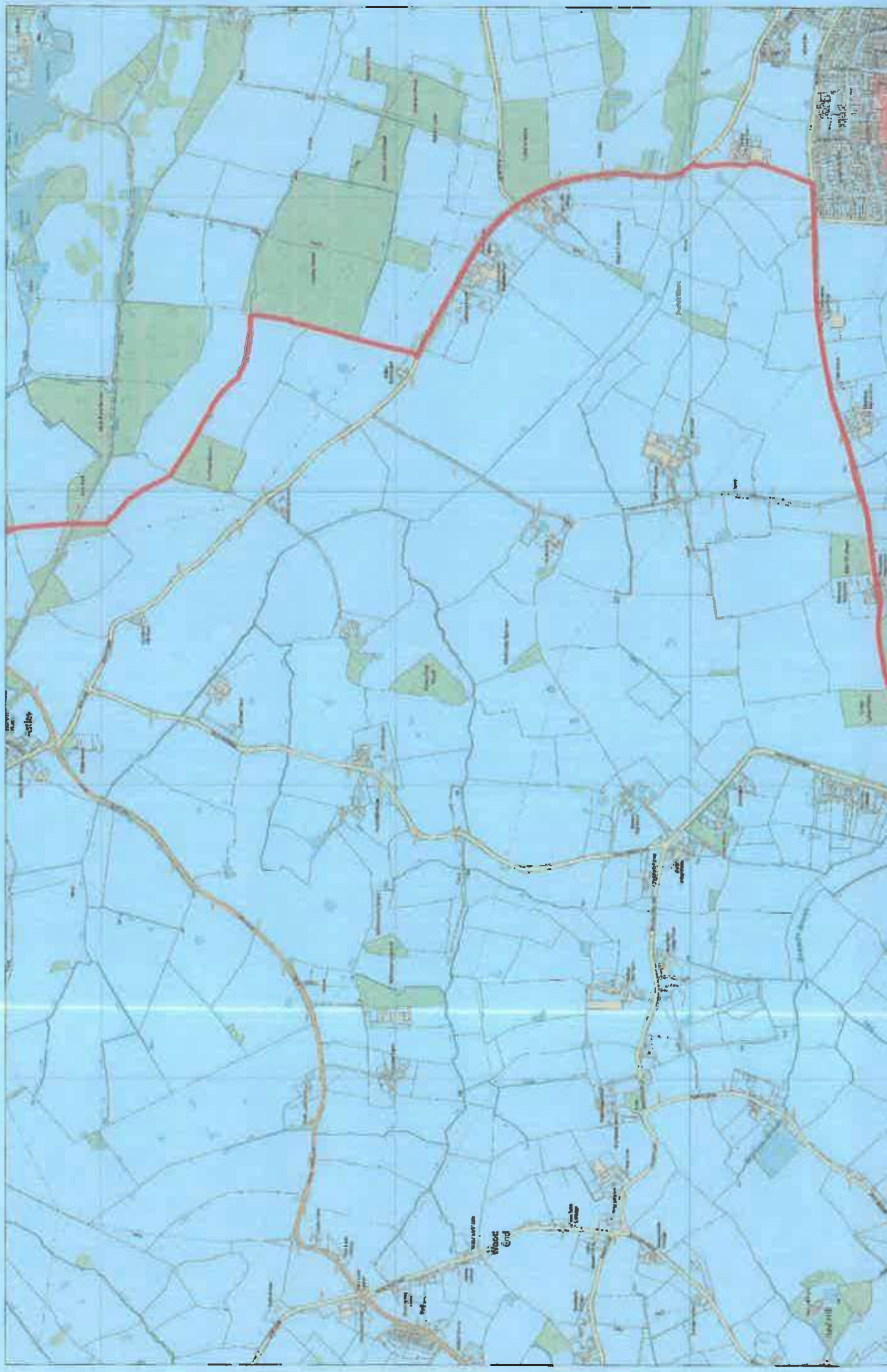
# Northeast Nuneaton





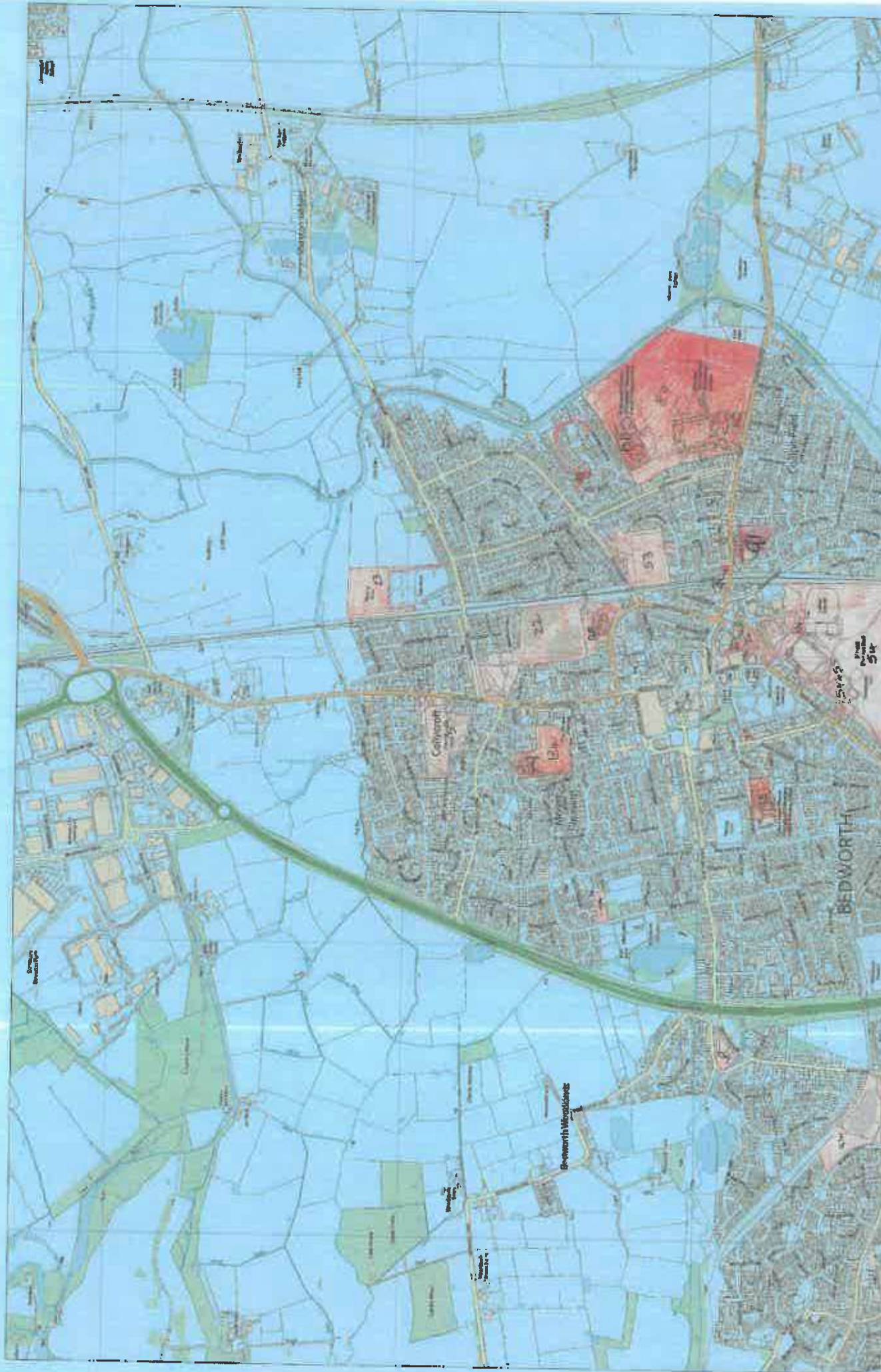
D

# Southwest Bedworth



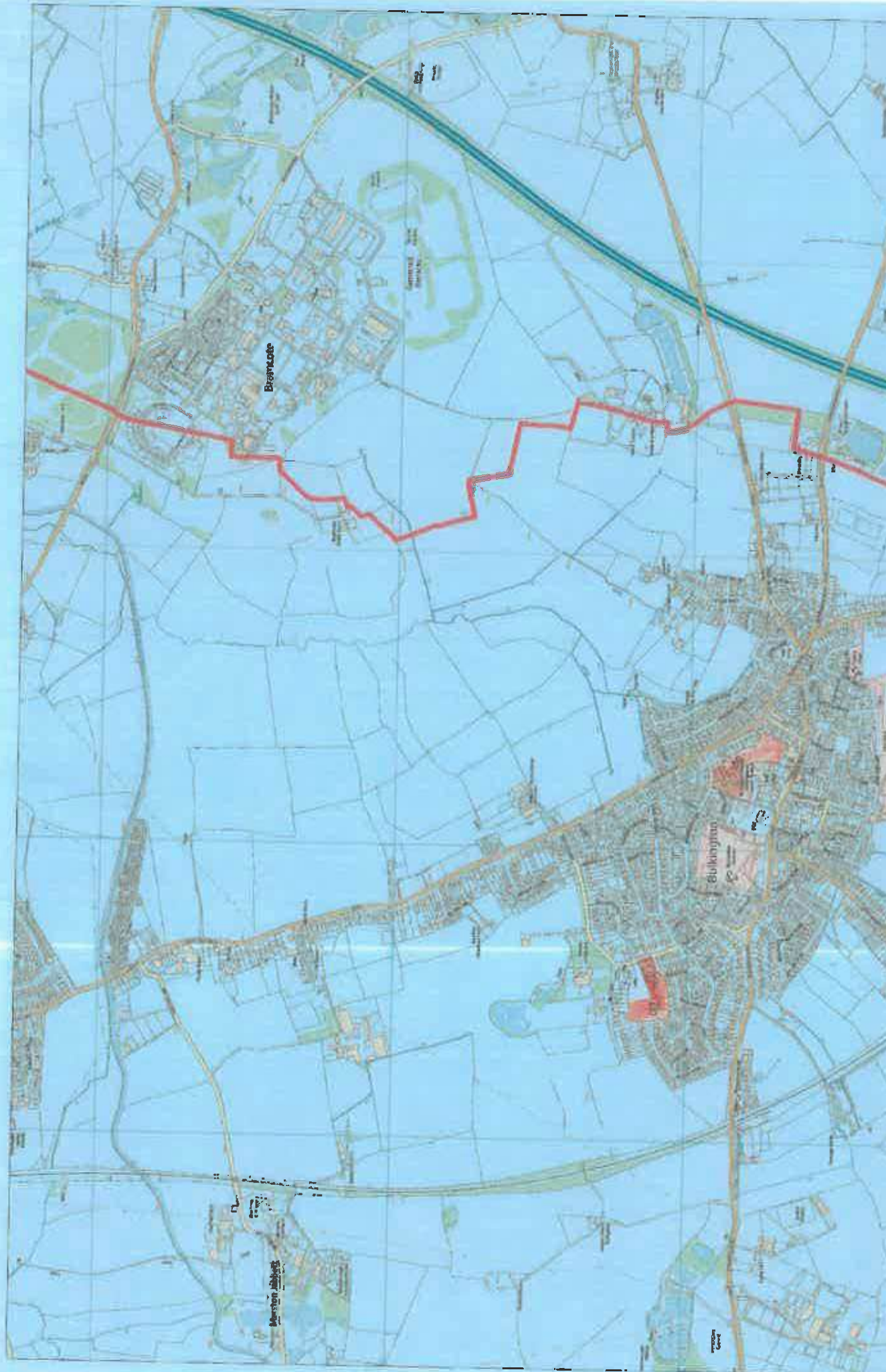


# South of Bedworth





# Southest Bedworth



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



North Warwickshire  
Borough Council



## Contents

1. Introduction .....	3
2. Initial Actions .....	4
3. Communication .....	5
4. The Law .....	6
5. Data Protection .....	7
6. Post-Incident Debriefing.....	7
7. Summary.....	8
8. Review .....	8
Appendix 1: Tactical and Operational leads for use of the Protocol .....	9
Appendix 2: Notification to Authorities of an Unauthorised Encampment.....	11
Appendix 3: Site Code of Conduct .....	12
Appendix 4: Guidance notes .....	13
Appendix 4: Information Sharing Meeting Checklist.....	15
Appendix 5: Process Flow charts Private and local Authority land.....	16

## 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 28<sup>th</sup> 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 28<sup>th</sup> 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	<a href="mailto:Richard.Long@warwickshire.police.uk">Richard.Long@warwickshire.police.uk</a>
Warwickshire County Council	Leon Livermore Head of Trading Standards and Community Safety	01926418127	<a href="mailto:leonlivermore@warwickshire.gov.uk">leonlivermore@warwickshire.gov.uk</a>
Warwickshire Police	Martin Rone-Clarke ; Gypsy Traveller Liaison/Advisor.	07768537483	<a href="mailto:Martin.rone-clarke1@warwickshire.police.uk">Martin.rone-clarke1@warwickshire.police.uk</a>
North Warwickshire Borough Council	Ryan Lee-Wilkes Principal Planning Enforcement Officer.  Dorothy Barratt Forward Planning & Economic Development Manager	01827719290  01827719250 07909094494	<a href="mailto:RyanLee-Wilkes@NorthWarks.gov.uk">RyanLee-Wilkes@NorthWarks.gov.uk</a>  <a href="mailto:dorothybarratt@northwarks.co.uk">dorothybarratt@northwarks.co.uk</a>
Nuneaton and Bedworth Borough Council	Sharon Clinton Assistant Director for Strategic Housing.  Doreen Katusiime, Private Sector Housing Manager	02476376121  02476376120	<a href="mailto:sharon.clinton@nuneatonandbedworth.gov.uk">sharon.clinton@nuneatonandbedworth.gov.uk</a>  <a href="mailto:Doreen.Katusiime@nuneatonandbedworth.gov.uk">Doreen.Katusiime@nuneatonandbedworth.gov.uk</a>



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

## **Appendix 2: Notification to Authorities of an Unauthorised Encampment**

Experience to 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

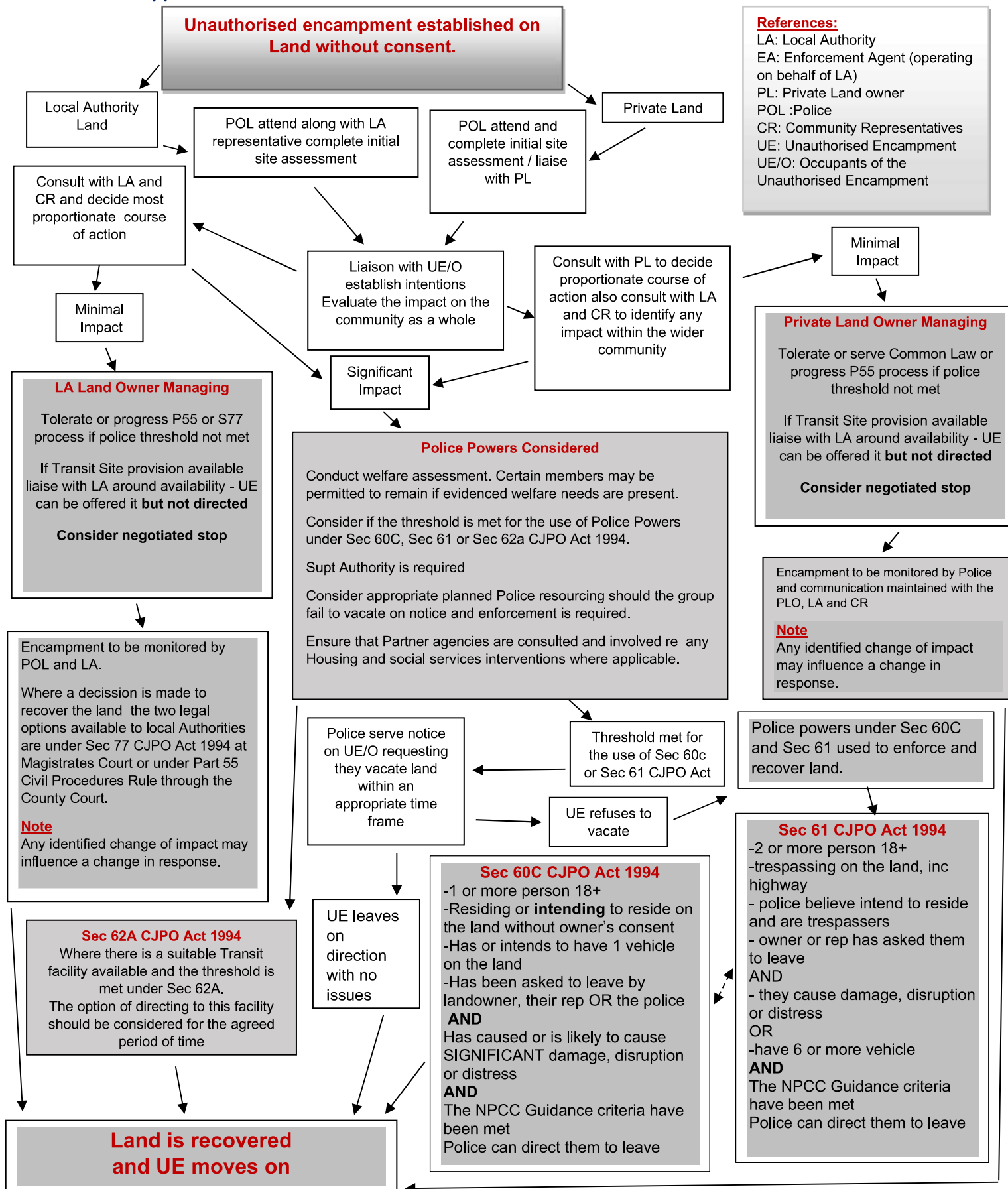
## Appendix 5: Information Sharing Meeting Checklist

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 –

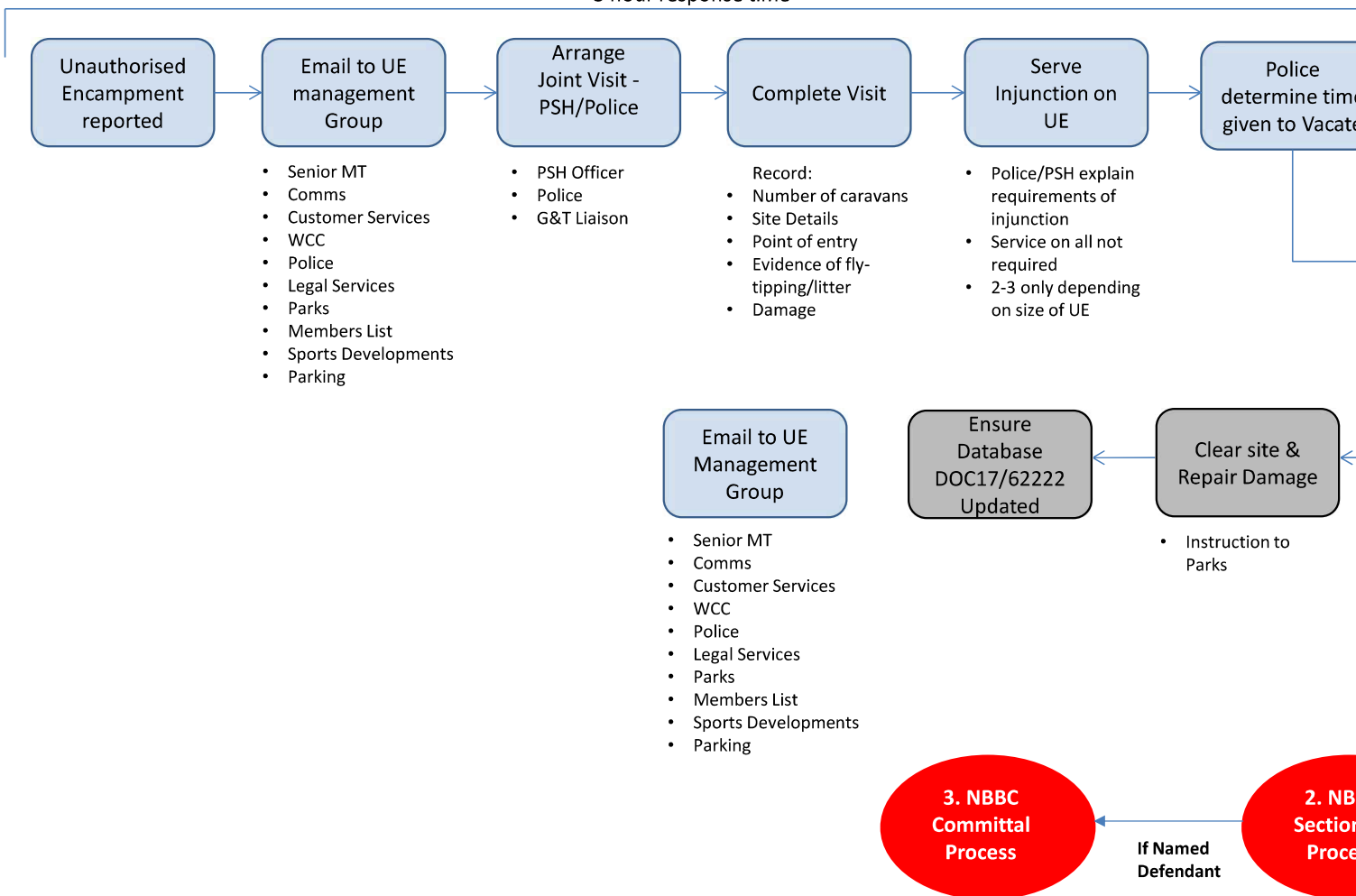
(1) THOMAS CORCORAN  
(2)-(53) OTHER NAMED DEFENDANTS  
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS  
WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

---

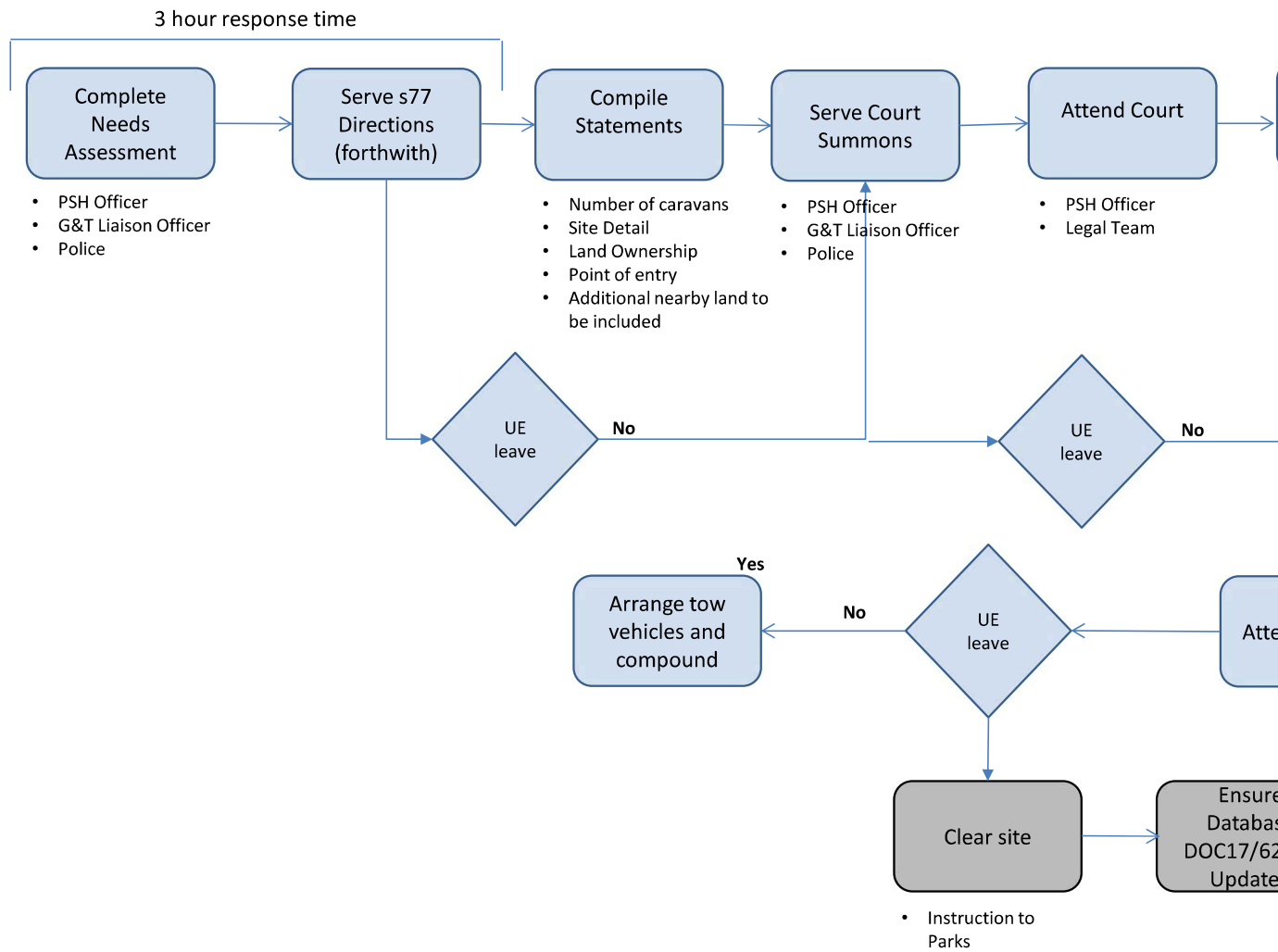
Exhibit 'AP1/4'

---





## Unauthorised Encampment Injunction Enforcement





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'

---

Claim No. QB-2019-000616

**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**

**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
B	ID	1535127	28	16/06/2025	202603	4401	DJ10		OR	17th March Aviemore - block out for
B	ID	1535127	27	16/06/2025	202603	4401	DJ10		OR	18th March Aviemore - block back a
B	ID	1535127	24	16/06/2025	202603	4401	DJ10		OR	1st Feb Attleborough Rec - moved b
B	ID	1535656	211	12/09/2025	202606	4401	DJ10		OR	1st May - blocks out at Heritage Cen
B	ID	1534236	3003	14/02/2025	202511	4401	DJ10		OR	1st November 2024 block move
B	ID	1535656	123	12/09/2025	202606	4401	DJ10		OR	21st July - blocks out at Heritage Ce
B	ID	1535656	217	12/09/2025	202606	4401	DJ10		OR	29th May - block back at Attleboroug
B	ID	1535656	213	12/09/2025	202606	4401	DJ10		OR	4th August - blocks back at Heritage
B	ID	1535656	210	12/09/2025	202606	4401	DJ10		OR	5th May - blocks back
B	ID	1534236	2999	14/02/2025	202511	4401	DJ10		OR	5th November 2024 block move
B	ID	1535127	26	16/06/2025	202603	4401	DJ10		OR	ADDITIONAL
B	ID	1535656	212	12/09/2025	202606	4401	DJ10		OR	April 2025 block hire
B	ID	1535656	214	12/09/2025	202606	4401	DJ10		OR	August hire
B	ID	1534236	2995	14/02/2025	202511	4401	DJ10		OR	December 2024 block hire
B	ID	1535127	29	16/06/2025	202603	4401	DJ10		OR	February 2025 block hire
B	ID	1535127	25	16/06/2025	202603	4401	DJ10		OR	January 2025 block hire
B	ID	1535656	215	12/09/2025	202606	4401	DJ10		OR	July block hire
B	ID	1535656	216	12/09/2025	202606	4401	DJ10		OR	June block hire
B	ID	1534560	141	28/03/2025	202601	4401	DJ10		E	Local Authority Annual Membership
B	ID	1535127	23	16/06/2025	202603	4401	DJ10		OR	March 2025 block hire
B	ID	1535656	218	12/09/2025	202606	4401	DJ10		OR	May 2025 block hire
B	ID	1534236	3007	14/02/2025	202511	4401	DJ10		OR	November 2024 block hire
B	ID	1534236	2991	14/02/2025	202511	4401	DJ10		OR	October 2024 block hire

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





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 'AP1/8'

---

Draft

## **The Warwickshire Countywide Protocol on Negotiated stopping.**

**Dealing with Unauthorised Encampments.**

Contents

1. Introduction ..... 3

2. Initial Actions and considerations..... 4

3. Site Management.....5

4.Contract.....6

5.Communication ..... 7

Appendix 1. NSP Debrief form.....8

Appendix 2: Signatories to Protocol ..... 8

Appendix 3: Tactical and Operational leads for use of the Protocol .....8

Appendix 4: NSP site management record. (Live document during period of stay) .....8

Appendix 5: Site Contract between land owner and occupant.....8

Appendix 6: Health and welfare Information Sheet.....8

## 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 refuse 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. Refuse 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.

**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**

---

**FIRST WITNESS STATEMENT OF MARTIN RONE-CLARKE**

---

I, **Martin Rone-Clarke**, Gypsy and Traveller Liaison Officer at Warwickshire Police, based at Nuneaton Justice Centre, Vicarage Street, Nuneaton CV114JU will say as follows:

1. I am the Gypsy and Traveller Liaison Officer at Warwickshire Police. I joined Warwickshire Police in 1990 and, after initially retiring in 2019, returned to Warwickshire Police to take up my current role. In my role, I act as the liaison between the Gypsy, Roma and Traveller ('GRT') community and the Police, and I am especially passionate about encouraging engagement between the Police and the GRT community, and educating Police Officers and helping them understand the GRT community and their needs.
2. I make this statement at the request of the First Claimant to present to the court the data that I hold in relation to unauthorised encampments that have formed in the county of Warwickshire (the '**County**'), as well as other relevant information on encampments that have formed and also the County's transit and stopping provision.
3. The facts and matters set out by me in this witness statement are either know by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge

to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement has been produced following correspondence with the Claimants' legal representatives.

### **Unauthorised Encampment Data**

4. As part of my role, I maintain a record of the unauthorised encampments that form in the County. I have consulted that record and can see that, since December 2024, there have been 42 unauthorised encampments in the County. These encampments have occurred on both private and local authority land. The breakdown of these encampments as between local authority areas is as follows:

- i. Rugby: 17
- ii. Stratford: 13
- iii. Warwick: 5
- iv. North Warwickshire: 4
- v. Nuneaton and Bedworth: 3

5. I have also consulted both my records and those of Warwickshire Police, and present below the unauthorised encampment data from the past seven years.

<b>Local Authority Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>Stratford District</b>	16	17	13	10	11	6	12
<b>Warwick District</b>	39	44	10	11	9	10	14
<b>Nuneaton and Bedworth</b>	33	24	12	6	7	14	1
<b>Rugby Borough</b>	44	35	13	10	8	22	16
<b>North Warwickshire</b>	7	4	7	11	9	5	6
<b>TOTAL</b>	<b>139</b>	<b>124</b>	<b>55</b>	<b>48</b>	<b>44</b>	<b>57</b>	<b>49</b>



6. The downward trend of unauthorised encampments in the County since 2022 can be attributed to many factors, including the establishment of the Kirby Glebe Farm Site in North Warwickshire (which is a large permanent Traveller site, most – but not all – of which now has planning permission, although there are injunctions in place to prevent expansion and further unauthorised development on the site), the discontinuance of the Kenilworth Horse Fair and, in Nuneaton and Bedworth, the presence of the injunction order prohibiting the formation of unauthorised encampments on 142 selected sites.
7. Rugby Borough continues to experience higher unauthorised encampment numbers than other local authority areas in the County. Many of these encampments are associated with a well-known Traveller family based outside of Warwickshire who target commercial premises for criminal enterprise, particularly the theft of high value cables and other materials.
8. Lastly, I also present a breakdown of the number of unauthorised encampments that formed on adopted highways, as recorded in both mine and Warwickshire Police's records.

	2018	2019	2020	2021	2022	2023	2024
<b>Total encampments (as above)</b>	139	124	55	48	44	57	49
<b>Warwickshire CC/highways</b>	38 (27%)	40 (32%)	18 (33%)	5 (10%)	8 (18%)	6 (11%)	15 (31%)
<b>Total caravans</b>	1389	1017	360	376	385	389	244

9. In the last year or so, there has been a notable increase in unauthorised encampments forming on adopted highways maintained by the local highway authority (the Second Claimant). Those encampments are typically 'New Age Travellers', who favour highway verges.

## **The Unauthorised Encampments in the Borough of Nuneaton and Bedworth**

10. I have consulted my records, and provide the following information in relation to the three unauthorised encampments that have occurred in Nuneaton and Bedworth since December 2024.

*4 September 2025*

11. I understand from the First Claimant's legal representatives that a small encampment formed on the grass verge outside of Aldi in Weddington. I was unaware of this encampment until advised of it by the First Claimant's legal advisers in the preparation of this witness statement. I therefore have no further detail to add in relation to this encampment, but have recorded it within my data.

*13 May 2025*

12. Hazel Way, Bermuda Industrial Estate (not a site protected by the injunction). Thirteen caravans and associated vehicles forced entry to a vacant (but still commissioned) privately owned commercial premises, with the occupants locking themselves in. The occupants had forced open a padlocked gate with an angle-grinder. Ten dogs were also present at the encampment.
13. The occupants were identified as members of a well-known Traveller family based outside of Warwickshire, and who are identified frequently in the Borough of Rugby (but who had not hitherto been identified in Nuneaton and Bedworth). The family are known for their criminal enterprise of theft from vacant commercial premises; their modus operandi is to force entry and lock themselves in a premises overnight, and strip high value materials from the premises (particularly cabling). There is a trigger plan that is activated if and when the family are identified on such commercial/industrial sites.
14. Given the significant risk of high value theft and damage being committed, the trigger plan was initiated, and Warwickshire Police sought to use its powers under section 60C of the Criminal Justice and Public Order Act 1994. A Police Support Unit was deployed and,

following negotiation, the encampment left the site and the area generally (and were observed heading towards Birmingham).

15. To my knowledge, the family have not been identified in the Borough of Nuneaton and Bedworth either prior to or since this incident. Immediately prior to arriving at the site, the family had been identified elsewhere in the County.

***24 March 2025 to 4 April 2025***

16. Withybrook Way, Bulkington (not a site protected by the injunction). Two horse-drawn caravans formed a small encampment on adopted highway. I did not receive any reports of issues or adverse impacts relating to this encampment, and I understand that the encampment vacated the land of its own motion prior to any enforcement action being taken by either of the Claimants. No policing response was required in relation to this encampment.

**Transit and Stopping Provision**

17. The County does not have a transit site. I am also aware that the neighbouring county of Staffordshire also does not have a transit site. However, West Midlands, which neighbours both the County and Staffordshire, operates two transit sites (in Walsall and Dudley). Of those two sites, one (Walsall) has a full suite of facilities on site, including toilets, showers, electricity supply and waste and water services.
18. I have in the past on occasions used both of the above mentioned transit sites, offering an alternative temporary site provision to families on unauthorised encampments in Warwickshire.
19. I am currently working with the Second Claimant (Warwickshire County Council) and Warwick District Council on a proposed transit site in Warwick. However, I expect that it will still be a few years before that site is operational.
20. The First Claimant does not at this time have a formally adopted negotiated stopping policy. I understand from the First Claimant's legal representatives that, in December 2024, the

court was informed that the First Claimant was working with other local authorities in the County to establish a countywide protocol for managing unauthorised encampments, which is separate to a negotiated stopping policy.

21. In 2017, a protocol for managing unauthorised encampments was established in Warwickshire and signed up to by all local authorities, the police and fire service. It has a working group that I chair, and the protocol was amended in 2022 to introduce and reflect the new Police powers that came into power in June 2022 under the Police, Crime, Sentencing and Courts Act 2022 (which amended the Criminal Justice and Public Order Act 1994, notably by inserting sections ss60C-E).
22. I am in the process of creating a standardised negotiated stopping policy for all local authorities in Warwickshire. I have written that policy in conjunction with the above mentioned protocol working group; the drafting is its final stages, and I can report that good progress has been made. My view is that, subject to the appendices being finalised, the policy is now ready for adoption, and I would be happy for the First Claimant to adopt it (subject of course to its usual governance and democratic processes). If adopted in its current form, I would aim to then expedite a full County-wide implementation.

### **Engagement with the GRT Community**

23. As I have set out above, I am very keen to encourage engagement between Warwickshire Police and the GRT community. However, I believe that the engagement should extend further, and should also exist with other agencies and public bodies, and the settled community. My view is that tensions often arise between the GRT community and others because of a misunderstanding and stereotyping of the GRT community; an entire community should not be judged against the standard of a minority of problematic members. It is my firm view that all forms of racism should be challenged, and racism and prejudice against the GRT community is no different in this regard.
24. In an attempt to forge better engagement with the GRT community, in 2022 I established the Warwickshire GRT engagement group. The group now consists of a variety of service providers across health, education and community engagement. The group has proved productive in engagement and building better community cohesion. For the last three years,



the group has put together a project for GRT History month, using artwork created by primary school children across the County to promote GRT History, and displaying this work across Warwickshire Libraries and a finale event at Police HQ. The project has been extremely productive in educating the general public on the reality of the GRT community, and subsequently contributing to better community cohesion. Representatives from the Second Claimant's (Warwickshire County Council) Gypsy and Traveller Team have been involved in supporting this project, and other work from the GRT engagement group.

25. I believe that progress is being made in the County, and that engagement is leading towards better relationships between the GRT community and public bodies and key agencies and, over time, the settled community more generally.

### **Statement of Truth**

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

Signed:

*M Rone-Clarke*

Martin Rone-Clarke

Date: 28th October 2025

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

**Claim No: 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**

---

**FIRST WITNESS STATEMENT OF SARAH MATILE**

---

I, **Sarah Matile**, Planning Manager (Policy) at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton CV11 5AA will say as follows:

1. I make this witness statement in support of the Claimants' application for the renewal of the injunction order of the Honourable Mr Justice Cotter dated 17 December 2024 for a further 12 months. I make this statement to explain to the Court the position with the First Claimant's supply balance of residential and permanent Gypsy and Traveller pitches in its administrative area.
2. The facts and matters set out by me in this witness statement are either known by me directly and are true or are known by me indirectly and are believed to the best of knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was produced following correspondence with Claimants' legal representatives.

3. There is exhibited to this statement a bundle of documents marked 'SM'. Where I refer to documents contained in that bundle I do so in the format **[SM/exhibit number]**.

### **The Local Plan**

#### **Assessed Need**

4. The Council's Borough Plan was adopted on 11<sup>th</sup> June 2019 and covers the plan period 2011 – 2031. I exhibit a copy of the Borough Plan at **SM/1**. Policy DS4 – Overall development needs and Policy H3 – Gypsies and Travellers in the Borough Plan set out the need for at least at least 39 residential and 5 transit pitches by 2031/32. This need figure was based on the 2016 Gypsy, Traveller and Travelling Showperson Accommodation Assessment (GTTSAA). Policy H3 proceeds to set out criteria to be used to identify potential locations for residential and permanent pitches through a separate Gypsy and Travellers Site Allocations Development Plan Document (GTSA DPD).
5. The Council's GTSA DPD **SM/2** was adopted on 17<sup>th</sup> January 2024 and covers the plan period 2021 to 2037. At the point of adoption, the GTSA DPD superseded Policy H3 of the Borough Plan in its entirety. To support the production of the GTSA DPD, the Council commissioned an updated GTTSAA in 2021 **SM/3**.
6. The GTTSAA 2021 indicates by 2036/37, 20 new pitches will be required, comprising of 16 for people defined as Gypsies and Travellers and a further 4 for a cultural need. No transit pitches are required. For clarity, I reproduce GTSA DPD Table 1: Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37.

Table 1 – Plan Period Gypsy and Traveller pitch need 2021/22 to 2036/27

Time period	Cultural need	Of which: PPTS need
<b>5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)</b>	<b>8</b>	<b>6</b>
<b>Longer-term need</b>		
<i>Over period 2026/7 to 2030/31 (B)</i>	4	3
<i>Over period 2031/32 to 2036/37(C)</i>	8	7
<i>Longer-term need TOTAL to 2036/37 (12 years) D=(B+C)</i>	<b>12</b>	<b>10</b>
<b>NET SHORTFALL 2021/22 to 2036/37 (A+D) (11 years)</b>	<b>20</b>	<b>16</b>

PPTS = Planning Policy for Traveller Sites (2015) within which the definition of gypsies and travellers is provide.

7. The Government's Planning Policy for Traveller Sites (PPTS) was updated in 2024 to reflect the new definition of Gypsy and Travellers that had resulted from a development in case law. The definition now includes those who previously did not meet the 2015 definition and has therefore been expanded to capture a wider range of persons.
8. As demonstrated in Table 1 above, the Council's GTTSAA included 4 pitches for those who did not meet the PPTS 2015 definition. Therefore, the need identified in the Council's GTTSAA 2021 in facts reflects the PPTS 2024 definition in any event and fully addresses the need even after the PPTS 2024 revision.
9. The 2021 GTTSAA assumes that some of this provision for additional pitches can be found through turnover of an existing Warwickshire County Council (WCC) ran site at The Griff and by a combination of intensification and expansion of three existing sites. I reproduce GTSA DPD Table 2: Addressing Gypsy and Traveller pitch need below.