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

SECOND WITNESS STATEMENT OF AMY PITTAM

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

1. I am a solicitor at the First Claimant, Nuneaton and Bedworth Borough Council (the **'Council'**). The Claimants apply pursuant to paragraph 11 of the Order of Mrs Justice Obi dated 3 December 2025 for the continuation of the injunction and power of arrest within that Order for a further 12 months against Persons Unknown (the **'Continuation Application'**). I make this statement in support of the Continuation Application. I am authorised by both the Council and the Second Claimant, Warwickshire County Council, to make this statement.

2. This statement is made from facts and matters which are within my own knowledge, save where indicated otherwise, and which I believe to be true. Where a matter is not within my knowledge, I identify the source of the information and believe the same to be true. This statement has been prepared following conference calls and email exchanges with the Claimants' legal advisers.

3. I exhibit to this witness statement a bundle of documents marked **AP2**. Where I refer to that exhibit I shall do so in the format **AP2/exhibit number**.

INTRODUCTION

4. On 17 December 2024, Cotter J granted the Claimants final injunctive relief against 33 Named Defendants until and including 17 December 2029. Further, the Judge granted injunctive relief against the 54th Defendant, a defined category of Persons Unknown. In accordance with the principles set down by the Supreme Court in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* [2023] UKSC 47 (**'*Wolverhampton*'**), that relief was granted for a period of one-year, with the option to apply for the continuation of the relief if so advised. I shall refer to the injunction against the 54th Defendant as the **'Injunction'**. I exhibit a copy of the Order at **AP2/1**.

5. A power of arrest was attached to the prohibitions of the Injunction (both as against the Named Defendants and Persons Unknown), pursuant to the Police and Justice Act 2006, s27.

6. The Injunction, as against both Persons Unknown and the Named Defendants, is a so-called 'Traveller injunction', and prohibits the formation of unauthorised encampments and the depositing of waste (ie. fly-tipping). The Injunction is **not** borough-wide against Persons Unknown, nor has it ever been, and captures only 142 sensitive sites in the administrative area of Nuneaton and Bedworth (the **'Borough'**). The Injunction, as it applies to the Named Defendants, is borough-wide.

7. Pursuant to paragraph 7 of the Order of Cotter J, the Claimants were given the express liberty to apply for the renewal of the Injunction against Persons Unknown. The Claimants made that application, and the Injunction was re-granted for a further year by Obi J on 3 December 2025; the Order again contained an express liberty to apply for the renewal of the Injunction against Persons Unknown. I exhibit a copy of the Order of Obi J at **AP2/2.** No application was made in relation to the Named Defendants, and the Order of Cotter J continues in relation to those persons. The Injunction against Persons Unknown is now due

to expire at midnight on 18 December 2026, and the Claimants apply to renew the same (the Continuation Application).

Content of this statement

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

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

9. The Claimants also rely on the second witness statements of Martin Rone-Clarke, Gypsy and Traveller Liaison Officer at Warwickshire Police, and Sarah Matile, Planning Manager (Policy) at the Council. Both witnesses gave evidence I support of the 2025 continuation application.

BACKGROUND

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

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

12. The claim was brought in response to the high numbers of unauthorised encampments that were being experienced in the Borough. In the claim, the Claimants' evidence showed that between April 2015 and the end of 2018, approximately 103 unauthorised encampments were experienced in the Borough; this included 80 encampments that had formed on the Council's land, six on land vested in the Second Claimant and 17 on privately owned land.

13. The sites that were being targeted by unauthorised encampments typically included open green spaces, business sites, sports and recreation areas and facilities, car parks and sites close to schools. The sites were often accessed through forced entry, causing damage to land and property.

14. The formation of unauthorised encampments caused significant harm to the Borough and the inhabitants of the Borough. Those harms, which were explored in full in the Claimants' evidence included:

    i. the fly-tipping of waste (including green waste, household waste and general rubble/ building waste);

    ii. the depositing of untreated human excrement at encampment sites, which is especially concerning where the encampment has formed on land and facilities used by children. The failure to practise proper sanitation risks the spread of disease and infection. The Claimants' evidence included examples of the following (which are not exhaustive):

        a. raw sewerage was left behind on the school fields at Vernons Lane (this was an especially large encampment of 32 caravans) in September 2018;

        b. excrement and soiled nappies and toilet paper was deposited in hedges at the Keresley Community Centre in both May 2017 and July 2018;

        c. bottles of urine, as well as excrement in clothes, nappies and bedding were thrown over the fence and into the Wembrook Primary School playground

when unauthorised encampments formed on adjacent land (that being Pingles overflow car park);

d. human excrement, soiled nappies and toilet tissue was left on the perimeter of the Camp Hill Primary School in April and September 2017 by an unauthorised encampment that had formed on adjacent land;

e. human excrement was left behind at the Bermuda Phoenix Community Centre in August 2018 by a large encampment comprising around 30 caravans;

iii. public open spaces, sports and recreation facilities being unavailable to the public both during an encampment and during the clean-up process after an encampment (especially where untreated human waste is being removed). Often this would lead to community tensions, and altercations between the occupants of encampments and the inhabitants of the Borough;

iv. threats, and the use of, force and violence against the inhabitants of the Borough. The Claimants' evidence included multiple examples of altercations between members of encampments and inhabitants of the Borough, some of which escalated into physical violence. Examples included, but were not limited to, the following:

a. in August 2018, the co-ordinator of the Bermuda Phoenix Community Centre reported having two teeth knocked out in an altercation with occupants of an encampment;

b. in May 2017, the administrator at the Keresley Community Centre reported being threatened with a bladed weapon when trying to prevent a group of Travellers accessing the site; and

c. in January 2019, the manager of the Nuneaton Harriers Club reported that they were slapped across the face by a youth from an encampment when asking that person to leave the running track;

v. the Claimants' evidence also included two examples of a school having to close by reason of the formation of an unauthorised encampment in April and September 2017. The school was closed for a combined total of five days;

vi. costs incurred in cleaning-up after encampments (by both the Claimants and private landowners) and in guarding against encampments and preventative measures;

vii. various anti-social behaviours, including verbal abuse and intimidating and threatening behaviour from occupants of unauthorised encampments.

15. The sites targeted by the unauthorised encampments were often not suitable sites for an encampment to form on, especially where an encampment caused harms of the nature described above; they were sites that had a high public footfall and usage, including by children.

Procedural history

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

i. on 22 February 2019, an alternative service order was granted by Dove J;

ii. on 19 March 2019, interim injunctive relief was granted by Timothy Straker QC (sitting as a Deputy Judge of the High Court). I exhibit a copy of the Order at **AP2/3**;

iii. the claim was then brought into the *Barking and Dagenham* litigation by Nicklin J, which culminated in the appeal to the Supreme Court in *Wolverhampton* in February 2023. The appeal determined the question of whether and in what circumstances final injunctive relief could be granted against newcomer persons unknown and, if so, what safeguards were required. The Claimants were successful respondents in the Supreme Court, with judgment being handed down on 29 November 2023;

iv. following *Wolverhampton*, directions were made and the claim came to 'final' hearing before Cotter J in December 2024. Injunctive relief was granted against the Named Defendants for a period of five years, and against the 54th Defendant (Persons Unknown) for a period of one-year, subject to the express liberty to apply for the continuation of the relief (the relief only being 'final' against the Named Defendants, following *Wolverhampton*);

v. the Claimants sought a 12 month continuation of the Injunction against Persons Unknown in 2025, which was granted by Obi J on 3 December 2025.

Unauthorised encampments since the grant of injunctive relief

17. The Claimants' evidence in the claim showed that, from the grant of the interim injunction on 19 March 2019 to June 2022, the Borough experienced at least 12 unauthorised encampments. Seventeen further encampments were then recorded between June 2022 and the Claimants' final updating evidence in September 2024.

18. I have reviewed the second witness statement of Martin Rone-Clarke, upon which the Claimants also rely on this Continuation Application. Whilst the date ranges in which his data is presented are different to the Council's, it does appear that Mr Rone-Clarke has recorded more encampments than the Council, especially in the period 2019 to 2022. There could be many reasons for the discrepancy in the data recording. In particular, if an encampment is not reported to the Council, and is short lived, it may not be attended by the Council and be recorded. Given Mr Rone-Clarke's specialist role, and his strong community contacts, it is unsurprising if he were to receive the first report of an encampment, and be the first to respond. Discrepancies in the data are unavoidable when multiple agencies are trying to record the formation of unauthorised encampments, and may sometimes simply be due to differences in recording methods.

19. Overall, the discrepancy in the data is limited and, as it was the Council's data that was relied on in December 2024, the data upon which the grant of injunctive relief was based was actually more favourable to Persons Unknown.

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20. Mr Rone-Clarke's data shows a dramatic drop in the number of unauthorised encampments forming in the Borough following the grant of the interim injunction in 2019 (save for an unusual blip in 2023 which, as I shall explain shortly, coincided with a period in which the power of arrest attached to the Injunction prohibitions was discharged, or at least treated as being discharged).

INJUNCTIVE RELIEF SOUGHT

21. As set out above, and as it applies to Persons Unknown, the Injunction prohibits the formation of unauthorised encampments and the depositing of waste on the 142 sites set out at Schedule 3 of the Order (the **'Injunction Sites'**). The relief is due to expire at 00:00 on 18 December 2026.

22. The Claimants seek the continuation of the Injunction and power of arrest for a further 12 months. A draft order accompanies the Continuation Application; no changes have been made to the Injunction prohibitions. A change has been made to paragraph 10, to formalise the practise that has been adopted throughout these proceedings in relation to alternative service. Counsel will alert the court to these changes at the hearing of the Continuation Application.

23. In line with the *Wolverhampton* guidance, the draft order again provides for the expiry of the Injunction after a period of one-year, with the option for the Claimants to make an application for its continuation (if so advised).

The 142 Injunction Sites

24. As was explained in the Claimants' evidence in the claim, the 142 Injunction Sites were selected by reason of these sites having been targeted by unauthorised encampments or, in some cases, being sites of a similar nature to those that have already been targeted by unauthorised encampments.

25. The Injunction Sites are sites where it is inappropriate (and harmful) for unauthorised encampments to form; many of the sites are used frequently by the inhabitants of the Borough, with many provided by the Council for the specific use and enjoyment of the

inhabitants of the Borough. As set out above, the Injunction Sites include areas such as public open spaces, business sites, sports and recreation facilities, car parks and land close to schools. In selecting the Injunction Sites, the Claimants were, and remain, mindful of the need to balance the rights of the inhabitants of the Borough (to whom the Claimants owe various duties) and the nomadic way of life of the Gypsy and Traveller community; the Claimants' view is that the selection of the 142 Injunction Sites strikes that balance, and is a proportionate response to the wrongs that have already been suffered and which are further apprehended.

26. When preparing the 2025 continuation application, I asked the Second Claimant to use its mapping tools to calculate the area of the Borough, and the area covered by the 142 Injunction Sites. The Second Claimant informed me that the area of the Borough is approximately 78.91 square km/ 30.47 square miles. The maps of the Injunction Sites had not been digitised, so this needed to be done in order to arrive at a figure for the area of the Injunction Sites. I was informed that there are several potential sources of inaccuracy, but that the Second Claimant's calculation, with that caveat attached, is that the total area covered by the Injunction Sites is approximately 4.45 square km/ 1.72 square miles. In percentage terms, that means that the Injunction Sites equate to around 5.6% of the Borough.

27. When preparing this Continuation Application, the Council has considered whether the 142 Injunction Sites require any further additions, or whether any sites should be removed from the scope of the Injunction. On balance, the Council considers that the Injunction should continue to capture all 142 sites; the Injunction Sites were selected carefully, and it is considered that this still represents the best balance between the rights and interests of the various communities. Since the grant of the Injunction in 2025, there has been a change to sites 54 to 56, where a new leisure centre has been built, with new car parking facilities. Sites 54 to 56 previously comprised a leisure centre and associated car parking and greenspace facilities; the new leisure centre and parking follows a different footprint on the ground, but remain facilities in the nature of those that need to be (and are) protected by the injunctive relief, and therefore these sites should remain within the scope of the renewed Injunction.

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28. The 142 Injunction Sites are only a small portion of the Borough; there are still very many sites in the Borough where an unauthorised encampment can stop and form without being in breach of the Injunction. Further, the Injunction does not act as a blunt exclusion/prohibition from the Injunction Sites, and the Injunction prohibitions have built in safeguards by which an encampment can stop on an Injunction Site without being in breach of the Injunction; most notably, those forming an encampment will not be in breach of the Injunction if they have formally negotiated with the Council to stop on the site.

The power of arrest

29. The Claimants seek the continuation of the power of arrest that support the Injunction prohibitions. The power of arrest is what gives the Injunction its force and utility in restraining the formation of unauthorised encampments. Cotter J was satisfied that the conditions for the grant of the power of arrest were met in December 2024 (as was the Deputy Judge when granting interim relief in March 2019), and the same was re-granted by Obi J in December 2025. It is pleasing that there have been no further incidents since December 2024 which display the harms (including threats and use of force or violence) that justified the power of arrest; that shows the efficacy of the Injunction (and not that the threat of such harms has dissipated), such that the power should be continued along with the prohibitions.

30. Without the power of arrest, the Claimants are left only with the option of enforcement by way of contempt proceedings. As against Persons Unknown, this is especially unsatisfactory and inefficient, and would undermine the Injunction as, in reality, there would probably be very little consequence for breach. Contempt proceedings require the identification of those in breach of the Injunction to enable the proceedings to be prepared, issued and served. As was explored in detail in the claim, it is often impossible to identify those on the land for a multitude of reasons; often those forming encampments choose not to engage with the Council, give incorrect or incomplete identification details and, where vehicle registration data is used to identify those persons forming the encampments, issues such as cloned plates and incorrect or complete data held by the PNC and/or DVLA often thwart attempts at identification.

31. I should make clear that the use of the power of arrest is a last resort, and it has never in fact been relied upon. The Council prefers, and has found it effective, to pursue a constructive approach by which officers of the Council visit an encampment and serve a copy of the injunction orders (where applicable and engaged) and engage with the occupants and explain the effect of those orders. Only if an encampment refused to move on after this engagement would the use of the power of arrest be considered.

HOW THE COUNCIL RESPONDS TO UNAUTHORISED ENCAMPMENTS

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

33. Upon receiving a report of the formation of an unauthorised encampment, officers from the Private Sector Housing Team will visit the encampment as soon as reasonably possible. At that visit, they will try and establish the identity of the occupants, how many occupants, caravans and associated vehicles are present, why the encampment has formed, and the intentions of those at the encampment (and specifically how long they intend to stay for). A welfare check and assessment will also be completed; officers will make enquiries as to whether there are any vulnerable persons present at the encampment, and assess whether there are any welfare needs. The officers will also make enquiries to determine who the landowner of the relevant land is.

34. If the encampment has formed on an Injunction Site, a copy of the Injunction will be provided to those present, and the officer will explain what the Injunction means, and how it operates (including with the power of arrest). The Council's aim is to engage constructively with the members of the encampment to educate them on the Injunction and assist their understanding; a constructive relationship is more likely to lead to a positive outcome, and reduce the chances of future breaches of the Injunction.

35. If the encampment has formed on an Injunction Site, the encampment will usually be requested to vacate the land. A short but reasonable period will generally be given to allow the orderly packing up and vacation of the land. However, the Injunction is not enforced

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blind to any compelling welfare needs, and the Injunction has the built-in safeguard that a breach will not be committed if the encampment is present on the land by way of a negotiated stop. Therefore, if there is a compelling welfare need identified, and the Council considers that the encampment should be tolerated on the Injunction Site (rather than being directed to an alternative site), a stopover can and will be negotiated. That stopover will always be subject to the condition that the encampment should remain clean and tidy, and that there should be no nuisances caused by the encampment; the Council's Parks, and Green Spaces department will provide bins to assist with keeping the stopping site tidy.

36. The above process has proved effective. The Council has never needed to enforce the Injunction by way of the power of arrest or contempt proceedings; encampments generally tend to move on swiftly when informed of the power of arrest.

37. Where the encampment has formed somewhere other than on an Injunction Site, the officers visiting the encampment will first establish whether there are any Named Defendants present at the encampment; if there are, the abovementioned process will be followed, as the Injunction is borough-wide as against the Named Defendants. If there are no Named Defendants present, the officers will continue to undertake the abovementioned welfare checks and consider what harms are likely to be caused by the encampment, and whether there is a reason to tolerate the encampment and negotiate a stop. If there is no reason to tolerate, the encampment will again be given a short but reasonable period in which to vacate. If the encampment remains in situ, the Council (or the Second Claimant or Warwickshire Police, as applicable), must then have recourse to the various powers under the Criminal Justice and Public Order Act 1994 to remove the encampment (which powers I shall explain further below).

38. As explained in the Council's evidence in the claim, the Council previously responded to unauthorised encampments in accordance with the standards and procedure set out in the County-wide 'Dealing with Unauthorised Encampments in Warwickshire Protocol 2017' (written by the Police and Crime Commissioner for Warwickshire), which was exhibited in the claim. That Protocol has since been reviewed and updated, most recently in September 2025, and I exhibit a copy of the September 2025 Protocol at **AP2/4**. The Council also has its own flow chart that records its own process and how it responds to unauthorised encampments, which I exhibit at **AP2/5**, and which has been recently updated.

There are two processes documented; one where the injunctive relief can be relied upon, and the second where the injunctive relief is not engaged.

THE SUCCESS OF THE INJUNCTION

39. The Injunction, and its predecessor orders, have been successful in reducing the frequency of unauthorised encampments forming in the Borough, especially on the 142 Injunction Sites. By way of summary:

Date range	Number of encampments
April 2015 to the end of 2018	103
19 March 2019 to June 2022 (ie. after the grant of the interim injunction)	12
June 2022 to September 2024	17
December 2024 to December 2025 (i.e after the grant of the Cotter J Injunction)	3
December 2025 onwards (ie. after the grant of the Obi J Injunction)	2

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

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

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

Reduction in harms suffered

43. The reduction in the frequency and duration of unauthorised encampments in the Borough has also caused a reduction in the harms that are suffered by reason of those encampments.

44. For example, the Claimants' presented the following data in relation to legal and eviction costs incurred by the Council by reason of unauthorised encampments:

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

45. That table shows that, following the grant of the interim injunction, the legal and eviction costs incurred by the Council fell dramatically; this is because the injunction orders, rather than other powers, could often be relied upon to remove encampments. It should be remembered that the Council has finite resources and is spending public money in the discharge of its public functions, so the reduced spend is welcome.

46. When preparing this witness statement, I have reviewed the Council's budget records and cannot find a record of any court fees having been incurred in relation to unauthorised encampments (save for in these injunction proceedings) since 2023.

47. The Claimants' evidence in the claim was also that, between 2012 and 2015, the Council spent approximately £64,000 on target hardening measures to try and prevent the formation of unauthorised encampments (this included the hire of concrete blocks to restrict access to open spaces). The Council still incurs costs of this nature, and is not wholly reliant on the Injunction to protect sensitive land in the Borough.

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48. To that end, I exhibit at **AP2/6** a spreadsheet that shows the costs in the sum of £10,125 were incurred in 2025 in protecting land from the formation of unauthorised encampments, with a further £9,023.77 (inclusive of VAT) being incurred in 2026 (the records for which I exhibit at **AP2/7**).

49. Since the grant of the Injunction in 2024, none of the five unauthorised encampments that formed in the Borough have been associated with fly-tipping or the depositing of human waste, such that this harm (and the costs associated with clearing up after such waste deposits), has fallen to nil in the last year.

50. Generally, since the grant of the interim injunction in 2019, incidents of fly-tipping and the depositing of waste have reduced; the reduced frequency and duration of encampments often means that there is reduced scope for such harms to occur. However, some encampments were still associated with such harms, with the most recent example in the Claimant's evidence having occurred in September 2023 when a large unauthorised encampment formed on Injunction Site 76 (Middlemarch Recreation Ground), and which lasted for approximately nine days (this being in the period when it was unclear if the power of arrest was in force). Costs in the sum of £6,055.61 (or £7,266.73 including VAT) were incurred by the Council in cleaning up after the encampment, which included the removal of tipped and human waste.

Unauthorised Encampments since December 2025

51. Since the grant of the Injunction on 3 December 2025, there have been two unauthorised encampments in the Borough. None of these encampments have formed on Injunction Sites.

52. In his second witness statement dated 15 October 2026, which I have reviewed, Martin Rone-Clarke has given details of two of those unauthorised encampments that formed in the Borough on 30 January 2026 and 25 July 2026. Until informed of those two encampments by way of that witness statement, the Council had been unaware of their formation. As I have mentioned above, Mr Rone-Clarke's specialist role means that he is often the first to receive reports of and respond to the formation of unauthorised

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

THE CONTINUING NEED FOR INJUNCTIVE RELIEF

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

    i. the Claimants apprehend that, if the Injunction was to expire and not be renewed, the frequency and duration of unauthorised encampments forming in the Borough, and especially on the sensitive Injunction Sites, would increase, and significant harm would be suffered by the inhabitants of the Borough;

    ii. the alternative powers that are available to the Claimants to enforce against and manage the formation of unauthorised encampments are not as effective or efficient as the Injunction, and significant harm will be suffered by the inhabitants of the Borough if the Claimants were forced to rely on these powers exclusively (as they did before the grant of injunctive relief).

The need for relief against Persons Unknown

54. The Continuation Application relates only to the 54th Defendant, Persons Unknown. At this time, the Claimants have not identified any other person against whom it would be proportionate to seek injunctive relief.

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

56. As I have also mentioned above (in the context of the power of arrest), when unauthorised encampments form, the Claimants are not always able to identify those who are present at the encampment. It is common for members of encampments to decline to give their names and identification details, or they will sometimes give false or incomplete names, or

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

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

Likelihood of further encampments

58. As set out above, the Injunction (and its predecessor orders) has been effective in reducing the frequency and duration of unauthorised encampments, especially on Injunction Sites. That said, two encampments did still form in 2026, which shows that the Borough is still attractive to unauthorised encampments. The Claimants apprehend that, if the Injunction were to expire and not be renewed, the number of unauthorised encampments would increase, as would the associated harms (such as fly-tipping, depositing of human waste and anti-social behaviour). It is not sustainable or acceptable for encampment numbers and associated harms to increase to pre-injunction levels, or anywhere close to that.

59. The data produced by Martin Rone-Clarke in his second witness statement (which I have reviewed) supports the Claimants' apprehension. Neighbouring local authority areas, which do not have the benefit of injunctive relief, have reported much higher encampment numbers in 2026 (and at all times since the presented data commences in 2019) as compared to the Borough. That shows that there clearly are unauthorised encampments that frequent the geographical area, and the Claimants apprehend that these encampments will migrate into the Borough and onto the Injunction Sites specifically should the Injunction not be renewed.

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

Alternative methods of enforcement and management

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

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

Criminal Justice and Public Order Act 1994, ss77-78

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

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

65. Further weaknesses in the use of s77 include:

    i. directions are only effective for three months, after which time those persons directed to leave the land can re-enter, and fresh enforcement proceedings are required. Section 77 is not a mechanism which can secure medium to long-term protection for especially sensitive or vulnerable land;

    ii. directions (and order obtained under s78) relate only to a specific parcel of land. The Claimants' experience is that when issued with s77 directions, encampments often move only a very short distance away to a new parcel of land, necessitating fresh enforcement proceedings (and causing yet further cost to the Claimants). This often creates a 'cat-and-mouse' series of enforcement proceedings as encampments move from one site to the next.

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

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

Criminal Justice and Public Order Act 1994, s60C and s61

68. Warwickshire Police also have specific powers to deal with unauthorised encampments. In particular, if the conditions of s61 are met, police officers can direct person(s) trespassing on land (for the purpose of residing there) to leave the land and remove any vehicles or property that they have with them. The conditions for the use of this power mean that it is

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available when an encampment is large (six or more vehicles) or aggravated (damage, disruption or distress is being caused). Failure to comply with a s61 direction is an offence, punishable by a fine or a custodial sentence of up to three months. A section 61 direction is effective for 12 months.

69. The 1994 Act was amended by the Police, Crime, Sentencing and Courts Act 2022 to insert s60C (with effect from 28 June 2022), which creates the offence of residing on land without consent and with or in a vehicle, subject to the conditions set out therein. An offence under the provision is again an offence punishable by a fine or a custodial sentence of up to three months.

70. The police powers under s61 and s60C are not a viable alternative to the Injunction in the medium and long-term, and will not prevent (or reduce to a significant degree) the harms suffered by reason of unauthorised encampments. In particular, the powers are police-led, and rely on Warwickshire Police having the available resourcing to use and enforce those powers.

71. The Claimants' experience prior to the grant of injunctive relief that Warwickshire Police cannot resource the use of those powers for every encampment that meets the conditions of the statutory provisions (or at least not in a swift enough manner to prevent harm being suffered). The reality is that the organisation has limited and finite resources, and cannot always prioritise responses to (and enforcement against) unauthorised encampments.

72. The power is also reactive and not proactive. It can only be relied upon once an unauthorised encampment has formed, and harms are being suffered. In contrast, the Injunction seeks to prevent harm to the most sensitive and vulnerable sites in the Borough. Further, the penalties carried by s61 and s60C again rely on the Magistrates' Courts being able to accommodate hearings.

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

Public space protection orders and byelaws

74. In *Wolverhampton* (in which the Claimants were successful respondents), The Supreme Court said that local authorities should consider whether using byelaws or public space protection orders (**'PSPO'**) are a suitable alternative to injunctive relief.

75. The process of introducing a PSPO can be slow; there are statutory requirements relating to consultation, publicity and notification. Therefore, a PSPO cannot be implemented (or amended) swiftly to react to problematic conduct, unlike injunctive relief. For example, if various PSPOs were used to prohibit encampments, but a site outside of the PSPO area became a frequent target for harmful encampments, the Council would not be able to react with speed to bring that site within the protection of a PSPO; in contrast, an application for the variation of the Injunction, or standalone injunctive relief, can be made with speed to protect the site and prevent harm.

76. The enforcement of a PSPO may also not succeed in moving on an encampment that has formed; a Police officer or Council officer could issue a fine (by way of a fixed penalty notice) to the occupants of the encampment, but this would not ensure the encampment was moved on, meaning that any negative impact on the local community would remain. Only for persistent breaches of a PSPO, where multiple fixed penalty notices have been issued, will there be a summons to court. In that time, the harm of the encampment would have been suffered, and resources used in ineffective enforcement against the encampment. The enforcement of a PSPO contrasts with the Injunction, where encampments can and are moved on swiftly.

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

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

STOPPING PROVISION IN THE BOROUGH

79. As is set out in the second witness statement of Martin Rone-Clarke made in support of this Application (which I have reviewed), the Borough does not operate a transit site, nor does the Council at this time have a formal adopted negotiated stopping policy (although it does operate the 'Warwickshire Protocol 2025' exhibited at **AP2/4** and the Council's own documented procedure exhibited at **AP2/5)**.

80. Mr Rone-Clarke also explains that a standardised negotiated stopping policy for all local authorities in Warwickshire remains in draft format, and has not been adopted by either the Council or any other local authorities across the county at this time. I am informed by the Strategic Director for Culture and Environment, Kevin Hollis, that despite the Council's original intention to adopt this policy, upon further review it is considered that the Council cannot deliver on the same. Therefore, it has been decided that the more appropriate course of action is to further review and update the Council's own negotiated stopping procedure, rather than adopt the standardised countywide policy produced by Mr Rone-Clarke.

81. The Borough did not have a designated transit site when Cotter J granted the Injunction in December 2024 and Obi J continued the Injunction in December 2025, nor did it have a formally adopted negotiated stopping policy. The Judges nonetheless granted and continued the Injunction and, when counsel raised the possibility that an undertaking to adopt a formal negotiated stopping policy could be given (as had been done in other similar matters), the Judges expressly said that they did not require the same.

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

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

ii. the Claimants have a power, but not an obligation, to provide a transit site (Criminal Justice and Public Order Act 1994, s80 and the Caravan Sites and Control of Development Act 1960, s24);

iii. a policy or procedure of negotiated stopping is a much more flexible approach to stopping and transit needs, and can better serve the needs of the Gypsy and Traveller community who may need to stop in a particular place for a short period (for example, to attend medical appointments), rather than directing them to a designated site which may not be suitably located for their needs.

ENGAGEMENT WITH THE TRAVELLER COMMUNTIY

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

84. Since the grant of the Injunction in December 2024, the Council attended an event on 30 June 2025 at Warwickshire Police HQ Leek Wootton, Warwick CV35 7QA. Doreen Katusiime (Private Sector Housing Manager) attended in support of the event. The event was a conclusion of several events in the County to celebrate Gypsy Roma Traveller History Month. The day saw artwork on display created by primary schools across the County. It gave professionals the opportunity to engage with other professionals dealing with Gypsy Roma Travellers and to speak to Gypsys and Travellers attending the event to gain a better understanding of their culture and history. I am informed by Ms Katusiime that she did not receive an invite to this or a similar event in 2026, and she therefore did not attend this year.

CONCLUSION

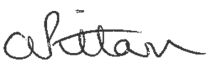
85. The Claimants seek a 12 month continuation to the Injunction in the form of the draft order.

There is a continuing need for the Injunction, and the Claimants apprehend that, if the Injunction was to expire, the frequency, size and duration of unauthorised encampments forming on the 142 Injunction Sites would increase, with the harm being suffered by reason of those unauthorised encampments increasing commensurately.

STATEMENT OF TRUTH

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

Signed:



Amy Pittam
5th November 2026

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IN THE HIGH COURT OF JUSTICE **Claim No: QB-2019-000616**
KING'S BENCH DIVISION

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP2'

IN THE HIGH COURT OF JUSTICE **Claim No: QB-2019-000616**
KING'S BENCH DIVISION

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP2/1'

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



BETWEEN:

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

Claimants

-and-

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

Defendants

ORDER

IF YOU, ANY OF THE ABOVE DEFENDANTS (WHETHER NAMED OR NOT), DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF

THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

UPON the Claimants' Claim seeking injunctive relief pursuant to the Local Government Act 1972, s222 and the Town and Country Planning Act 1990, s187B to restrain unauthorised encampments in the Borough of ~~Test Valley~~ Nuneaton and Bedworth.

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

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

POWER OF ARREST

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

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

- **The defendant shall be brought before a Judge of the High Court within a period of 24 hours beginning at the time of their arrest. For the purposes of this requirement, a remote hearing will suffice;**
- **A constable shall inform the person on whose application the injunction was granted forthwith where the defendant is arrested under these powers.**

Nothing in sections 27 of the Police and Justice Act 2006 shall authorise the detention of the defendant after the expiry of the period of 24 hours beginning at the time of their arrest.

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

IT IS ORDERED THAT:

A. INJUNCTION ORDER

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

   And

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

are **forbidden** from:

a) Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority or the Secretary of State, or written consent from the Local Planning Authority or in accordance with statutory permitted development rights.

b) Setting-up an encampment (as defined below) on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, save for where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).

c) Setting-up an encampment (as defined below) on any part of the Land (as defined below) without Written Permission from the Local Planning Authority, or planning permission granted by the Secretary of State or in accordance with statutory permitted development rights.

d) Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans/mobile homes other than when driving through the highways on the Land or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority or the Secretary of State, or with Written Permission from the Local Planning Authority or in accordance with statutory permitted development rights.

e) Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.

Power of arrest

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

Definitions

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

a) The **'Land'** means:

i. For the Named Defendants, all land within the Borough of Nuneaton and Bedworth as marked with the red outline on the map attached at Schedule 2 to this Order;

ii. For the 54th Defendant (Persons Unknown), all the land marked on the maps at Schedule 3 to this Order and identified by the key to the map and list of sites, and numbered 1 to 142 on that list.

b) **'Encampment'** means the entering and/or occupying of any part of land for residential purposes (temporary or otherwise) with caravans/mobile homes.

c) **'Controlled Waste'** has the same meaning as within s.75(4) of the Environmental Protection Act 1990.

d) **'Written Permission from the Local Planning Authority'** includes, but is not limited to, written permission granted pursuant to any negotiated stopping agreement, policy or procedure.

B. SERVICE

4. Pursuant to CPR 6.26 and 6.27, the Claimants are permitted to serve this Order on the Named Defendants by way of first-class post to the last known address of the Defendant. Service shall be deemed to have been effected on the second business day after the posting.

5. Pursuant to CPR 6.26 and 6.27, this Order shall be deemed served on the 54th Defendant (Persons Unknown) on the date when a copy of this Order (as opposed to an original) is affixed as a laminated copy or in a transparent envelope in a prominent position on all 142 sites defined as the Land in paragraph 3(a)(ii) above.

C. LIBERTY TO APPLY

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

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

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

8. A hearing shall be listed on **3 December 2025**, with a time estimate of 1 day, at which the Renewal Application shall be considered. If the Claimants do not make a Renewal Application, they must notify the Court as soon as reasonably practicable and seek to vacate the hearing.

9. Any person other than the Claimants who would like to participate in the hearing of the Renewal Application must also file and serve on the Claimants any evidence upon

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

E. COSTS

10. The Named Defendants shall pay the Claimants' costs of the Claim on the standard basis to be assessed if not agreed. The time by which detailed assessment must be commenced is to be extended to the date of the review hearing, as set out in paragraph 8 above.

11. The Named Defendants shall each make a payment on account of costs to the Claimants in the sum of £2,817 by 4pm on 31st December 2024, the said sum being an assessment of a reasonable sum on account of costs.

12. No order as to costs against the 54th Defendant.

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

14. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

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

INTERPRETATION OF THIS ORDER

16. In this Order, where there is more than one Defendant, unless otherwise stated, references to “the Defendants” means each or all of them.

17. A requirement to serve on “the Defendants” means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.

18. An Order requiring the Defendants to do or not to do anything applies to all Defendants.

COMMUNICATIONS WITH THE COURT

19. All communication to the Court about this order should be sent to Kings Bench Listing, Royal Courts of Justice, Strand, London, WC2A 2LL. The telephone number is 0203 936 8957. The offices are open between 10am and 4pm Monday to Friday. The email address is kbjudgeslistingoffice@justice.gov.uk.

20. All communication to the Claimants about this Order should be sent to Legal Services, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton CV11 5AA. The telephone number is 024 7637 6476, the email address in legal.admin@nuneatonandbedworth.gov.uk.

Order Dated 17 December 2024

SCHEDULE 1 – LIST OF NAMED DEFENDANTS

List of Defendants and their addresses

(1) THOMAS CORCORAN – Plot 10 Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB

(2) JESSICA DODDS, Plot 10, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB

(3) MICHAEL DOYLE, 6 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL

(4) LUKE DELANEY, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB

(5) PATRICK McGINLEY, Barn Fisheries, Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB

(6) ALPHONSUS McGINLEY, 7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL

(7) MICHAEL STOKES, 29 Oaktree Field Caravan Site, Odstock Road, Salisbury, Wiltshire SP2 8BY

(8) MICHAEL STOKES, 6 Horsdean Travelers Site, Braypool Lane, Patcham Brighton, East Sussex BN1 8PP

(9) DENNIS STOKES, Plot 6 Kirby Glebe Farm, Hartshill, Nuneaton CV10 0TB

(10) DENNIS STOKES (JNR), Caravan 6 Dun Roamin Park, Whitfield, NN13 5TD

(11) BRIAN STOKES, 12a, Orchard Drive, Smithy Fen, Cottenham, Cambridgeshire, CB24 8PT

(12) JOHN MAUGHAN, 14 Long Green, Cressing, Braintree, Essex, CM77 8DL

(13) TERRY MAUGHAN, 70 Exton Avenue, Luton, Bedfordshire, LU2 0LJ

~~(14) TERRY MAUGHAN, 10 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~

(15) PATRICK MAUGHAN, 12 Bashley Road Caravan Site, Bashley Road, London, NW10 6TH

(16) OWEN MAUGHAN, 7 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL

(17) OWEN MAUGHAN, 8 Imari Park, 38 Russell Street, Derby DE24 8AL

~~(18) BERNARD CORCORAN, No Fixed Abode~~

~~(19) FRANCIS CORCORAN, No Fixed Abode~~

(20) FRANCIS MAUGHAN, 14 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL

(21) MARTIN MAUGHAN, 81 Constitution Road, Chatham, Kent, ME5 7DN

(22) THOMAS MAUGHAN, 11 Kanes Hill Caravan Site, Botley Road, Southampton, SO19 0SA

(23) JOHN MONGAN, 1 Gapton Hall Road, Great Yarmouth, Norfolk, NR31 0NL

~~(24) MARTIN MONGAN, 14 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL~~

(25) MARTIN MONGAN, 9 Limehouses, Boathorse Road, Stoke-On-Trent, Staffs ST6 4QQ

(26) LEONARD MONGAN, 8 Pendles Paddock, Marlow Road, Stokenchurch, High Wycombe, Bucks, HP14 3UW

(27) PAUL McDONAGH, 9 Russell Street, Derby

~~(28) SIMON McDONAUGH, 3 Thistle Grove Caravan Park, Main Road, Collin, Dumfries, DG1 4JE~~

(29) BERNARD McDONAGH, 37 Boathorse Road, Stoke-On-Trent, Staffordshire, ST7 4JA

(30) JOHN McDONAGH, Caravan 7 Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD

(31) MIKE McDONAGH, 62 De Laly Street, Ashton-On-Ribble, Preston, Lancashire, PR2 2DD

(32) MARTIN McDONAGH, 29 Speyside Court, Orton, Southgate, Peterborough, PE2 6SN

(33) AARON McDONAGH, 9 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL

~~(34) KATHLEEN McDONAUGH, 3 Orchard View, Horseman Side, Brentwood, Essex, CM14 5SU~~

(35) WINNIE McDONAUGH, Caravan 14, Dun Roamin Park, Whitfield, Brackley, Northants, NN13 5TD

~~(36) MARTIN WARD, 73 Mullacreevie Park, Armagh, BT60 4BB~~

~~(37) PAT WARD, 333 Mullacreevie Park, Armagh, BT60 4BB~~

(38) MICHAEL WARD, Splashes, Castle Acre Road, Swaffham, Norfolk, PE37 7XE

(39) KATHLEEN WARD, 2 Imari Park, 38 Russell Street, Derby DE24 8AL

~~(40) ROSELEEN WARD, 6 St Agnells Lane, Hemel Hempstead, Herts, HP2 7AX~~

(41) BERNIE SWEENEY, Kanes Hill Caravan Park, 11 Botley Road, Southampton, SO19 USA

(42) JOHN CONNORS, 2 Costalot Stables, Heath Road, Leicestershire, LE67 1DG

~~(43) TRACEY BROWN, 72 Lower Ecton, Ecton Lane Caravan Site, Northants NN3 5HQ~~

~~(44) WILLIAM BRIDGES, 16 Ling Croft, Brough, North Humberside, HU15 1TU~~

~~(45) TOM WARD, No Fixed Abode~~

~~(46) EDDIE McDONAUGH, No Fixed Abode~~

~~(47) EDDIE (AKA EDWARD) WARD, No Fixed Abode~~

~~(48) CHRISTOPHER McDONAUGH, No Fixed Abode~~

~~(49) WILLIAM DOHERTY, No Fixed Abode~~

~~(50) GERRY O'BRIEN, No Fixed Abode~~

~~(51) ELIZABETH O'BRIEN, No Fixed Abode~~

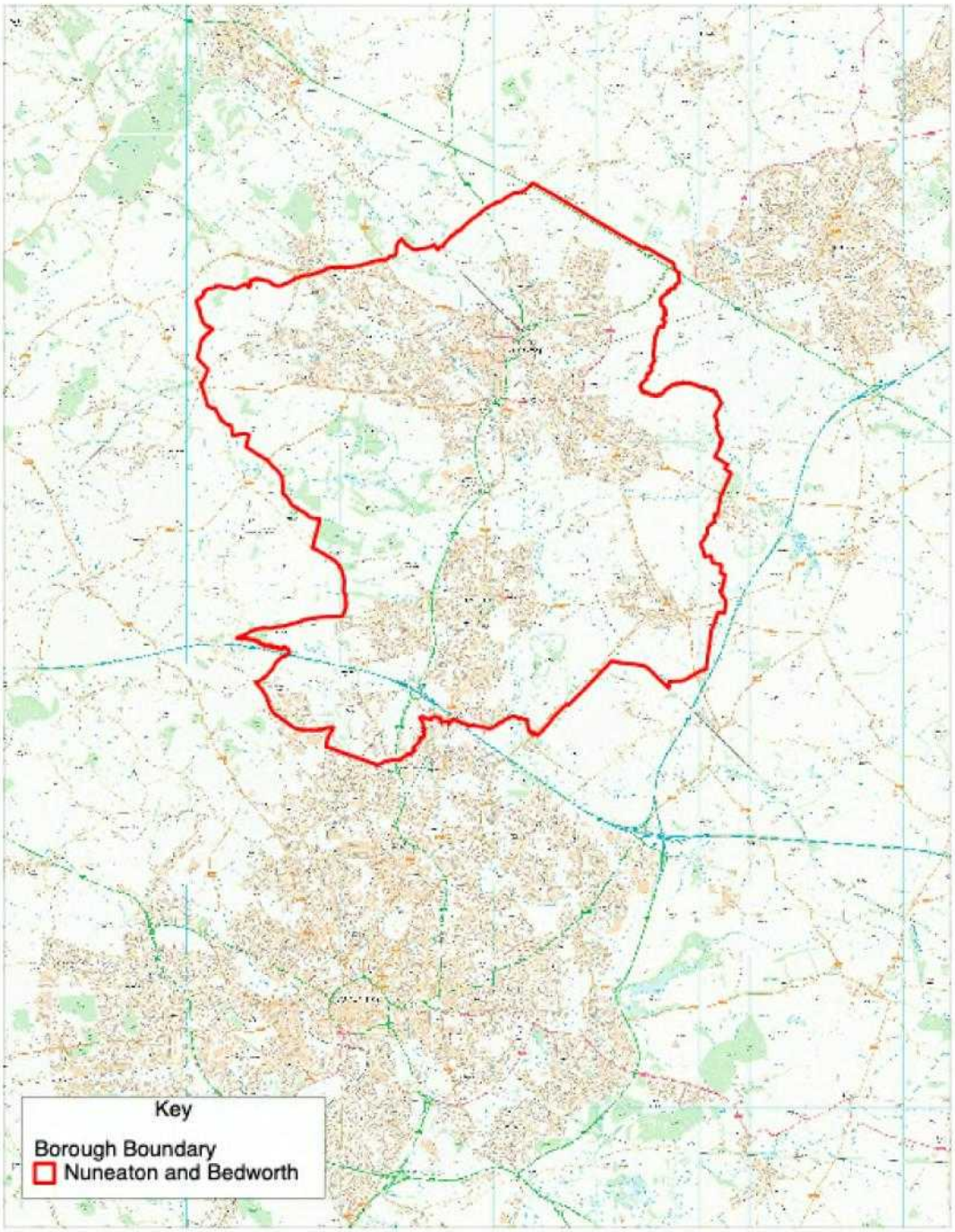
~~(52) PEARL BLAINLEY, No Fixed Abode~~

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

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

SCHEDULE 2 – MAP OF THE BOROUGH

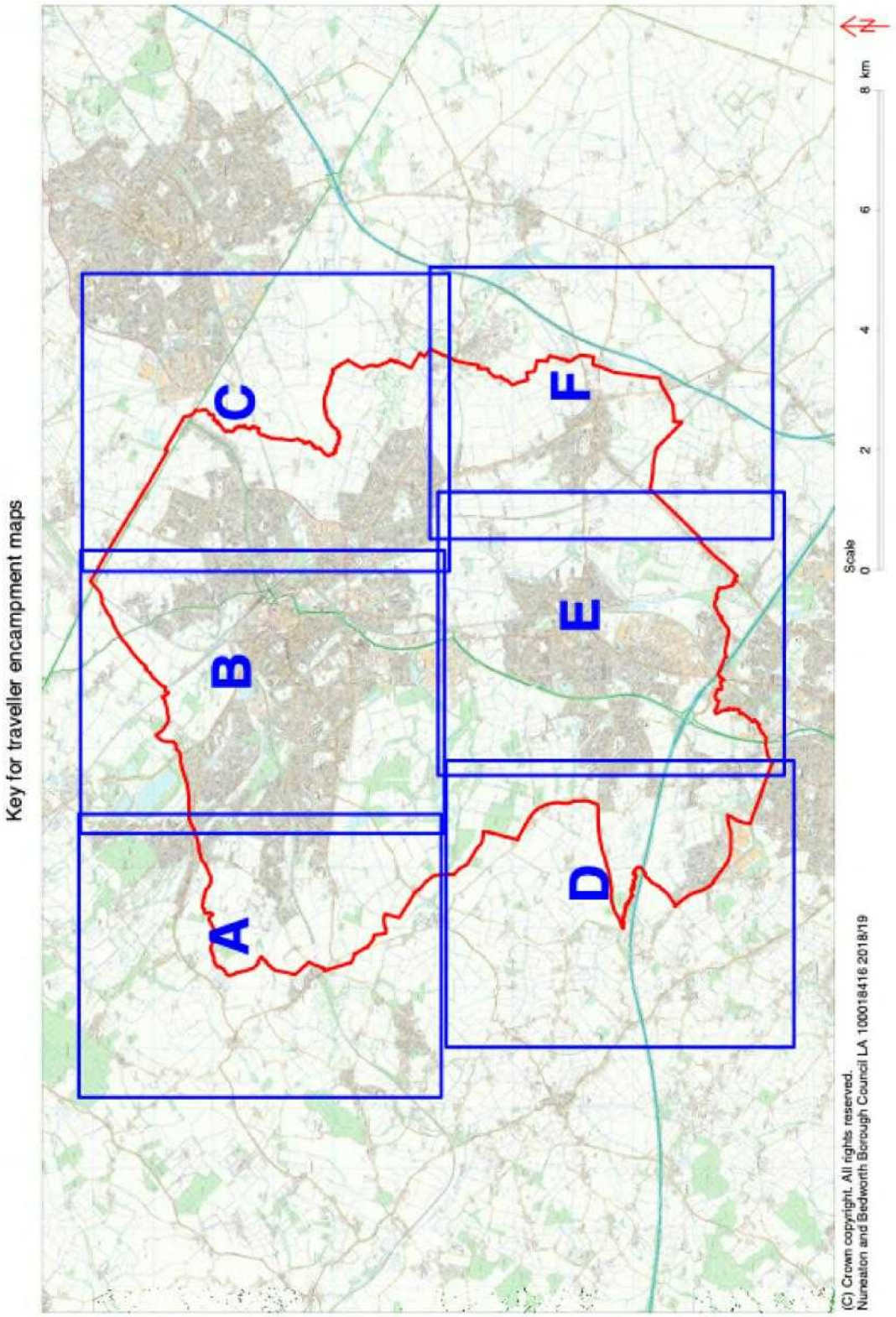
Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

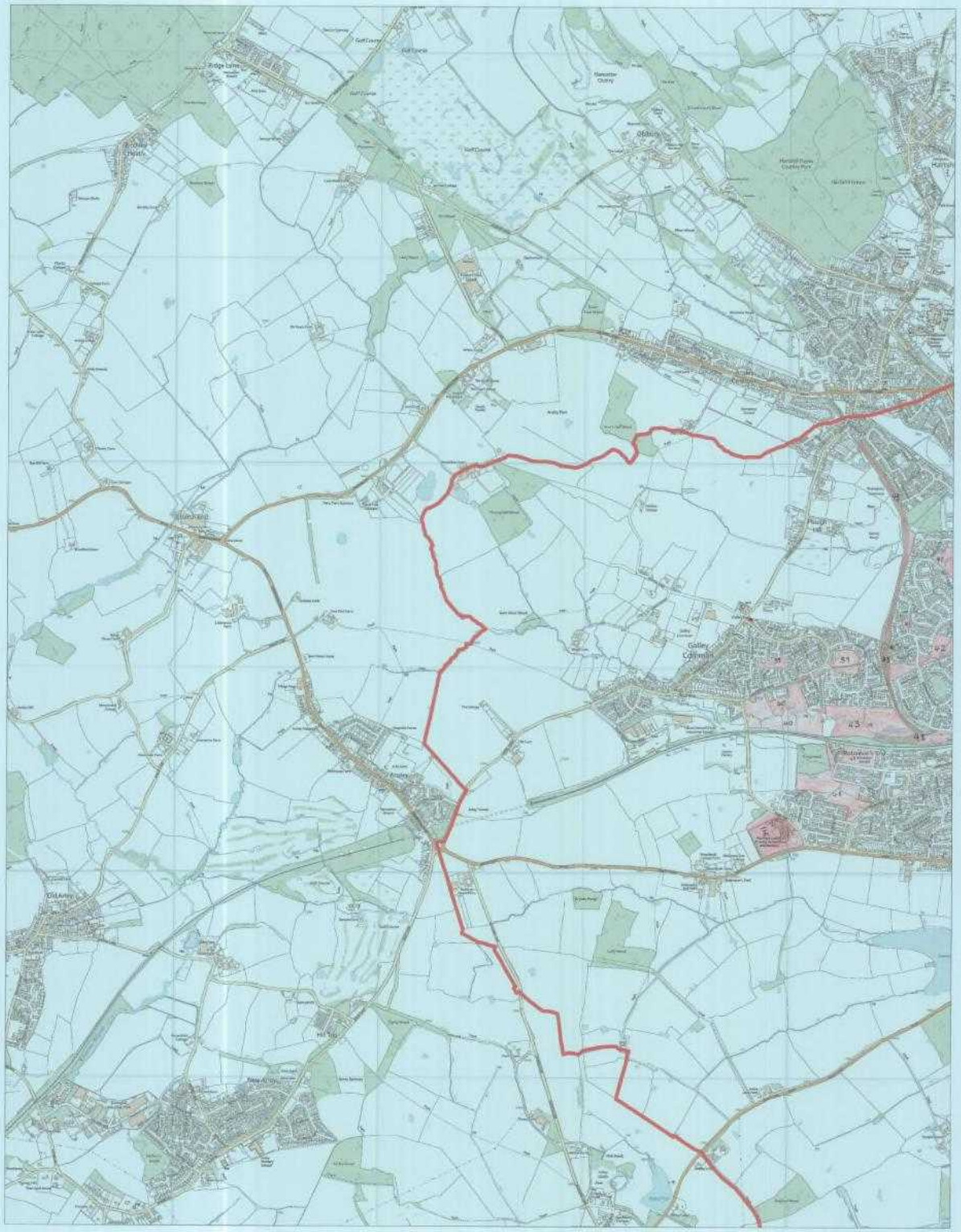
Not to scale

SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN



A

Northwest Nuneaton

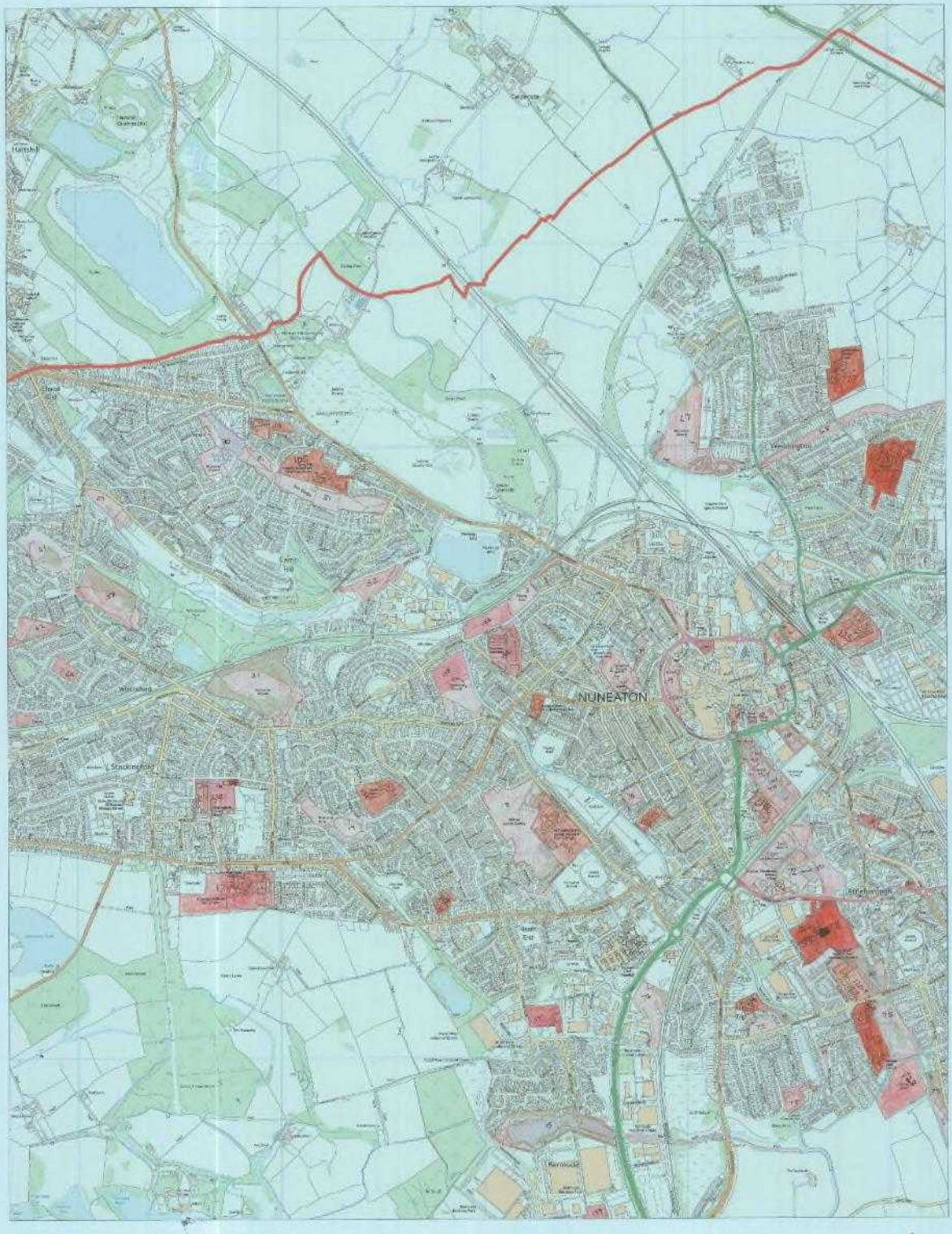


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100018416 2018/19

Scale
0 250 500 750 1000 m

B

North of Nuneaton



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Scale
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C

Northeast Nuneaton

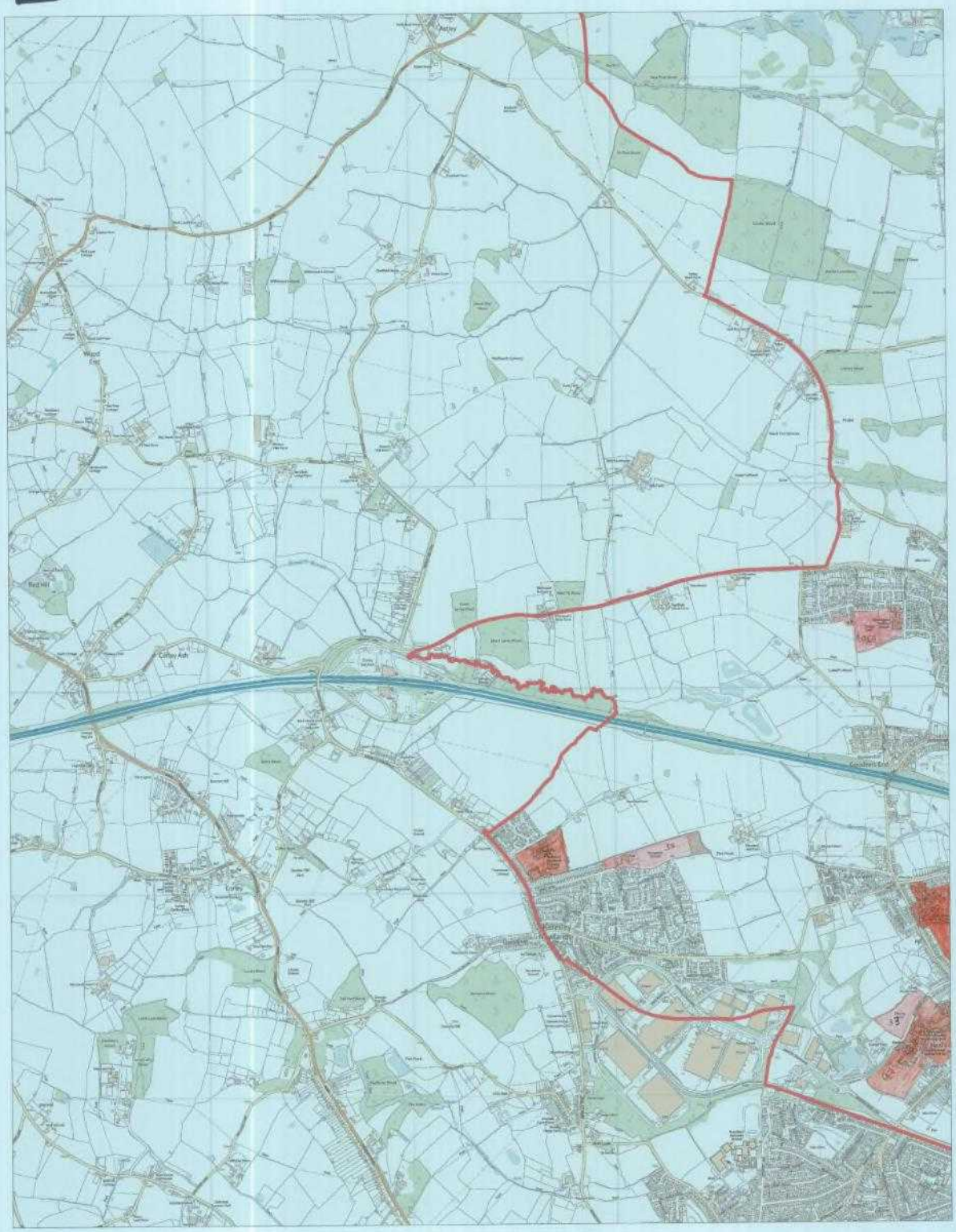


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Scale
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D

Southwest Bedworth

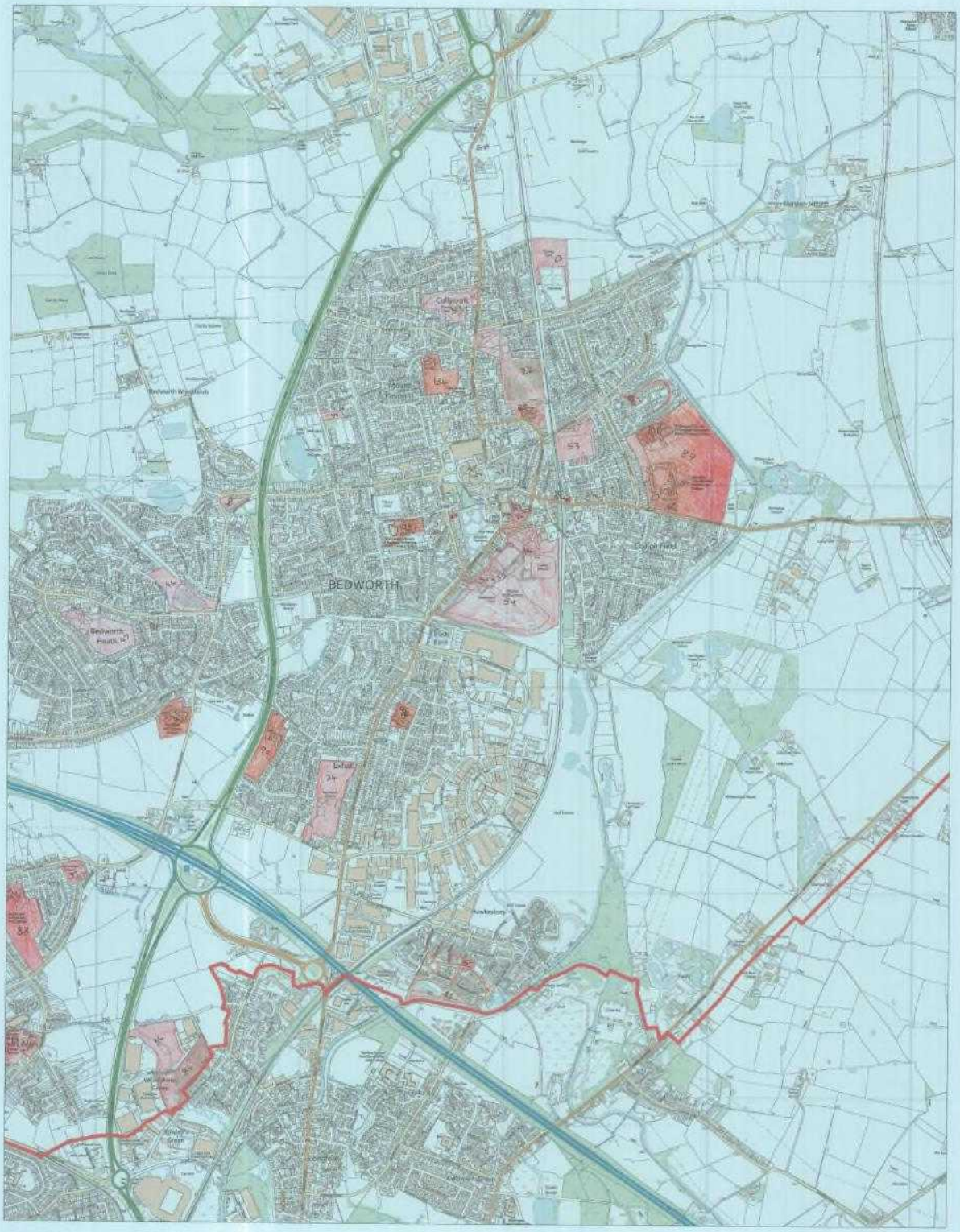


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Scale
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E

South of Bedworth

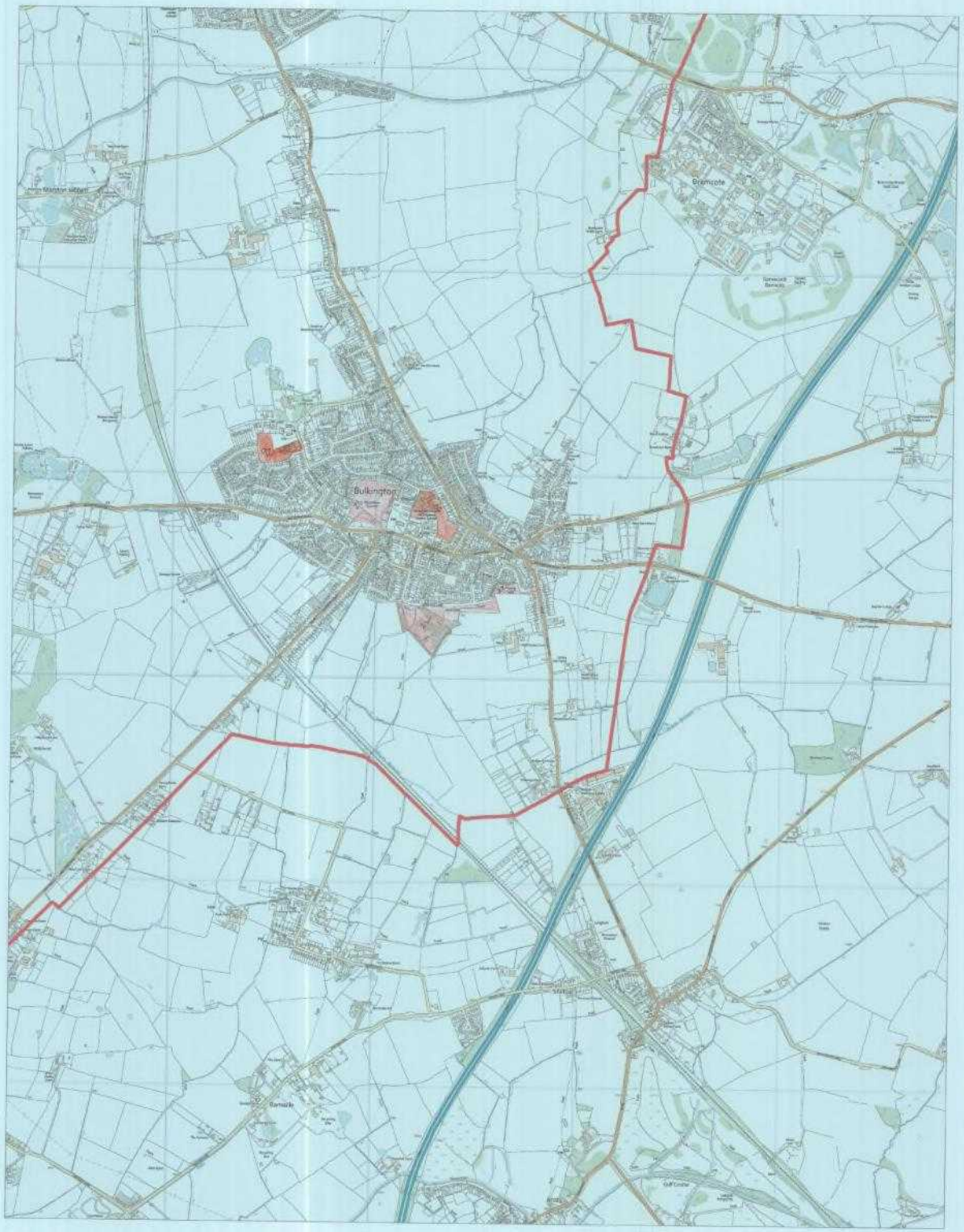


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Scale
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F

Southeast Bedworth



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Scale
0 250 500 750 1000 m

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

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

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

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

"		Oakwood Secondary School, Morris Drive, Nuneaton			Private	WK468048
"		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH			WCC	WK233776
121	C	Playing field adjoining St Nicholas C of E Primary School, Windemere Aveneue, Nuneaton CV11 6HJ	×	CV11 6HJ	WCC	WK473130
"		Land on the East Side of Windermere Avenue, Nuneaton			Private	WK131856
"		St Nicolas C of E First School, Windermere Avenue, Nuneaton, CV11 6HJ			Private	WK473119
122	B	Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton	✓	CV10 0DR	WCC	WK149023/WK216447
123	B	Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP	✓	CV11 4QP	Private	WK458966
124	B	Wembrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton	✓	CV11 4LU	NBBC	WK448965
125	B	Etone College, Leicester Road, Nuneaton, CV11 6AA	✓	CV11 6AA	WCC	WK425515
126	B	Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	✓	CV10 0BJ	Private	WK465311
127	B	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓	CV11 4QH	WCC	WK468047/WK468048/WK233776
128	B	The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Rad	✓	CV10 7PD	WCC	WK175243/WK425489
129	C	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓	CV11 6BH	Private	WK428695
130	B	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓	CV11 4BE	Private	WK497842/WK497832
131	E	Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP	×	CV12 0DP	WCC	WK426282
132	D	Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
"		Exhall Grange Special School, Wheelwright Lane, Coventry			Private	WK440475
"		Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP	✓	CV7 9HP	Private	WK450903
133	E	Quest Academy, North Side of Griff Lane, Nuneaton	✓	CV10 7SD	WCC	WK365844
134	E	Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton	×	CV12 8AG	WCC	WK240628
"		Race Leys Middle School, Barton Road, Bedworth, CV12 8HG		CV12 8HG	Private	WK465841
135	B	Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
"		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 8JH	WCC	WK42667
136	C	Whitestone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton	×	CV11 4SQ	WCC	WK23140
137	B	Attlebrough Mills, Attleborugh Road, Nuneaton (aka Holman Way)	×		Private	WK256088
138	B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton	×	CV11 5SS	Private	WK430022
139	B	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓	CV10 7SD	Private	wk447390
140	B	Halfords - land and buildings on the south side of Newtown Road, Nuneaton	×	CV11 5UT	Private	WK390614
141	B	Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre)	✓	CV10 7HU	Private	WK474729
142	C	Land on the North Side of Ambleside Way, Nuneaton CV11 6AT (aka Ambleside Community Sports Club)	✓	CV11 6AT	Private	WK392039/WK57909

N110A

Power of arrest

Name of court	Claim No.
High Court of Justice King's Bench Division	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	

Name of defendant

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

Defendant's address

See attached continuation sheet

Seal

HIGH COURT OF JUSTICE
28 JAN 2025
QUEEN'S BENCH DIVISION

Date order made 17/12/2024 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 17/12/2024 **and expires on the** 17/12/2029

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

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IN THE HIGH COURT OF JUSTICE **Claim No. QB-2019-000616**
KING'S BENCH DIVISION

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 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

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

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

   And

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

   are **forbidden** from:

a) Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority or the Secretary of State, or written consent from the Local Planning Authority or in accordance with statutory permitted development rights.

b) Setting-up an encampment (as defined below) on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, save for where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).

c) Setting-up an encampment (as defined below) on any part of the Land (as defined below) without Written Permission from the Local Planning Authority, or planning permission granted by the Secretary of State or in accordance with statutory permitted development rights.

d) Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans/mobile homes other than when driving through the highways on the Land or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority or the Secretary of State, or with Written Permission from the Local Planning Authority or in accordance with statutory permitted development rights.

e) Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.

Power of arrest

2. …

Definitions

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

a) The **'Land'** means:

i. For the Named Defendants, all land within the Borough of Nuneaton and Bedworth as marked with the red outline on the map attached at Schedule 2 to this Order;

ii. For the 54th Defendant (Persons Unknown), all the land marked on the maps at Schedule 3 to this Order and identified by the key to the map and list of sites, and numbered 1 to 142 on that list.

b) **'Encampment'** means the entering and/or occupying of any part of land for residential purposes (temporary or otherwise) with caravans/mobile homes.

c) **'Controlled Waste'** has the same meaning as within s.75(4) of the Environmental Protection Act 1990.

IN THE HIGH COURT OF JUSTICE **Claim No: QB-2019-000616**
KING'S BENCH DIVISION

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP2/2'

IN THE HIGH COURT OF JUSTICE **Claim No. QB-2019-000616**
KING'S BENCH DIVISION

Before the Honourable Ms Justice Obi
3 December 2025

B E T W E E N :



QB-2019-000616

(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 AGAINST THE 54th DEFENDANT (PERSONS UNKNOWN)

IF YOU PERSONS UNKNOWN DISOBEY OR BREACH 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 THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

UPON the Application of the Claimants dated 28 October 2025 (the 'Application') seeking to continue the injunction Order of Cotter J dated 17 December 2024 (as amended under the slip rule CPR 40.12 and re-sealed on 28 January 2025) for a period of one year as against the 54th Defendant (Persons Unknown) only

AND UPON the court being satisfied that the Application has been served on the 54th Defendant (Persons Unknown) in accordance with the Order of Cotter J dated 17 December 2024, save that sites 21, 23, 73 and 142 were served only on 24 November 2025 such that the Claimants seek relief from sanctions in relation to the same

AND UPON the court being satisfied that notice of the Application was given to the three Gypsy and Traveller representative groups who were the appellants in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* [2023] UKSC 47

AND UPON hearing Natalie Pratt of counsel for the Claimants and there being no attendance by or representations made for or on behalf of the 54th Defendant (Persons Unknown)

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 2026**, the 54th Defendant (Persons Unknown) are **forbidden** from:

    a) Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise), including by the occupation of caravans/mobile homes and/or the 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 with Written Permission 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 all the land shaded in red on the maps at Schedule 3 to this Order, as identified by the key to the map and on the list of sites (and numbered 1 to 142 on that list).

b) **'Encampment'** means the entering and/or occupying of any land or part of land for residential purposes (whether temporary or otherwise), including the occupation of caravans/mobile homes, and the storage of vehicles, caravans and residential paraphernalia.

c) **'Controlled Waste'** has the same meaning as within s.75(4) of the Environmental Protection Act 1990, namely household, industrial or commercial waste or any such waste.

d) **'Written Permission from the Local Planning Authority'** includes, but is not limited to, written permission granted pursuant to any negotiated stopping agreement, policy, procedure or practise.

Suspension

4. The prohibitions at paragraphs 1(a) to 1(e) inclusive of this Order shall be suspended in relation to sites 21, 23, 73 and 142 (as set out in Schedule 3 to this Order) until 4pm on 31 December 2025.

B. SERVICE

5. Pursuant to CPR 6.26 and 6.27, this Order and the power of arrest shall be deemed served on the 54th Defendant (Persons Unknown) on the date when a copy of this Order and the power of arrest (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) above.

6. For the avoidance of doubt, service shall be effected when a copy of the Order and the power of arrest is first affixed in accordance with paragraph 5 above, irrespective of whether the documents are subsequently removed by a someone other than the Claimants or their agents/representatives.

C. LIBERTY TO APPLY

7. The Defendants or anyone notified of this Order may each of them apply to the court on 72 hours written notice to both the court and the Claimant (without prejudice to the right of that person to apply to shorten the time for written notice) to vary or discharge this Order or so much as if it affects that person. The contact details for both the court and the Claimant can be found in paragraphs 9 and 10 below.

8. Any person who applies to vary or discharge or discharge this Order must supply their full name and address for service.

D. COMMUNICATIONS WITH THE CLAIMANTS AND THE COURT

9. All communications 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.

10. All communications with the court about this Order should be sent to KBJudgesListingOffice@justice.gov.uk or Room E03 Royal Courts of Justice, Strand, London WC2A 2LL, tel: 020 3936 8957. The offices are open tween 10am and 4pm Monday to Friday.

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

11. The Order against the 54th Defendant (Persons Unknown) will expire by the effluxion of time on 00:00hrs on **18 December 2026**. The Claimants may, if so advised, apply

for the renewal of the Order against the 54th Defendant (Persons Unknown) (the **'Renewal Application'**). Any Renewal Application and evidence in support must be filed and served in accordance with paragraph 5 above by 4pm on **6 November 2026**.

12. A hearing shall be listed on **3 December 2026**, with a time estimate of ½ 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.

13. 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 **20 November 2026**.

F. COSTS

14. No order as to costs against the 54th Defendant (Persons Unknown).

Dated 3 December 2025

GUIDANCE NOTES

EFFECT OF THIS ORDER

1. 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, and must not do it through others acting on his behalf or his/her/their instructions or with his/her/their encouragement.

2. 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

3. 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

4. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.

5. 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.

6. An Order requiring the Defendants to do or not to do anything applies to all Defendants.

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

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~~(19) FRANCIS CORCORAN, No Fixed Abode~~

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(21) MARTIN MAUGHAN, 81 Constitution Road, Chatham, Kent, ME5 7DN

(22) THOMAS MAUGHAN, 11 Kanes Hill Caravan Site, Botley Road, Southampton, SO19 0SA

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(26) LEONARD MONGAN, 8 Pendles Paddock, Marlow Road, Stokenchurch, High Wycombe, Bucks, HP14 3UW

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(29) BERNARD McDONAGH, 37 Boathorse Road, Stoke-On-Trent, Staffordshire, ST7 4JA

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(32) MARTIN McDONAGH, 29 Speyside Court, Orton, Southgate, Peterborough, PE2 6SN

(33) AARON McDONAGH, 9 Sandiacre, Long Green, Cressing, Braintree, Essex CM77 8DL

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~~(37) PAT WARD, 333 Mullacreevie Park, Armagh, BT60 4BB~~

(38) MICHAEL WARD, Splashes, Castle Acre Road, Swaffham, Norfolk, PE37 7XE

(39) KATHLEEN WARD, 2 Imari Park, 38 Russell Street, Derby DE24 8AL

~~(40) ROSELEEN WARD, 6 St Agnells Lane, Hemel Hempstead, Herts, HP2 7AX~~

(41) BERNIE SWEENEY, Kanes Hill Caravan Park, 11 Botley Road, Southampton, SO19 USA

(42) JOHN CONNORS, 2 Costalot Stables, Heath Road, Leicestershire, LE67 1DG

~~(43) TRACEY BROWN, 72 Lower Ecton, Ecton Lane Caravan Site, Northants NN3 5HQ~~

~~(44) WILLIAM BRIDGES, 16 Ling Croft, Brough, North Humberside, HU15 1TU~~

~~(45) TOM WARD, No Fixed Abode~~

~~(46) EDDIE McDONAUGH, No Fixed Abode~~

~~(47) EDDIE (AKA EDWARD) WARD, No Fixed Abode~~

~~(48) CHRISTOPHER McDONAUGH, No Fixed Abode~~

~~(49) WILLIAM DOHERTY, No Fixed Abode~~

~~(50) GERRY O'BRIEN, No Fixed Abode~~

~~(51) ELIZABETH O'BRIEN, No Fixed Abode~~

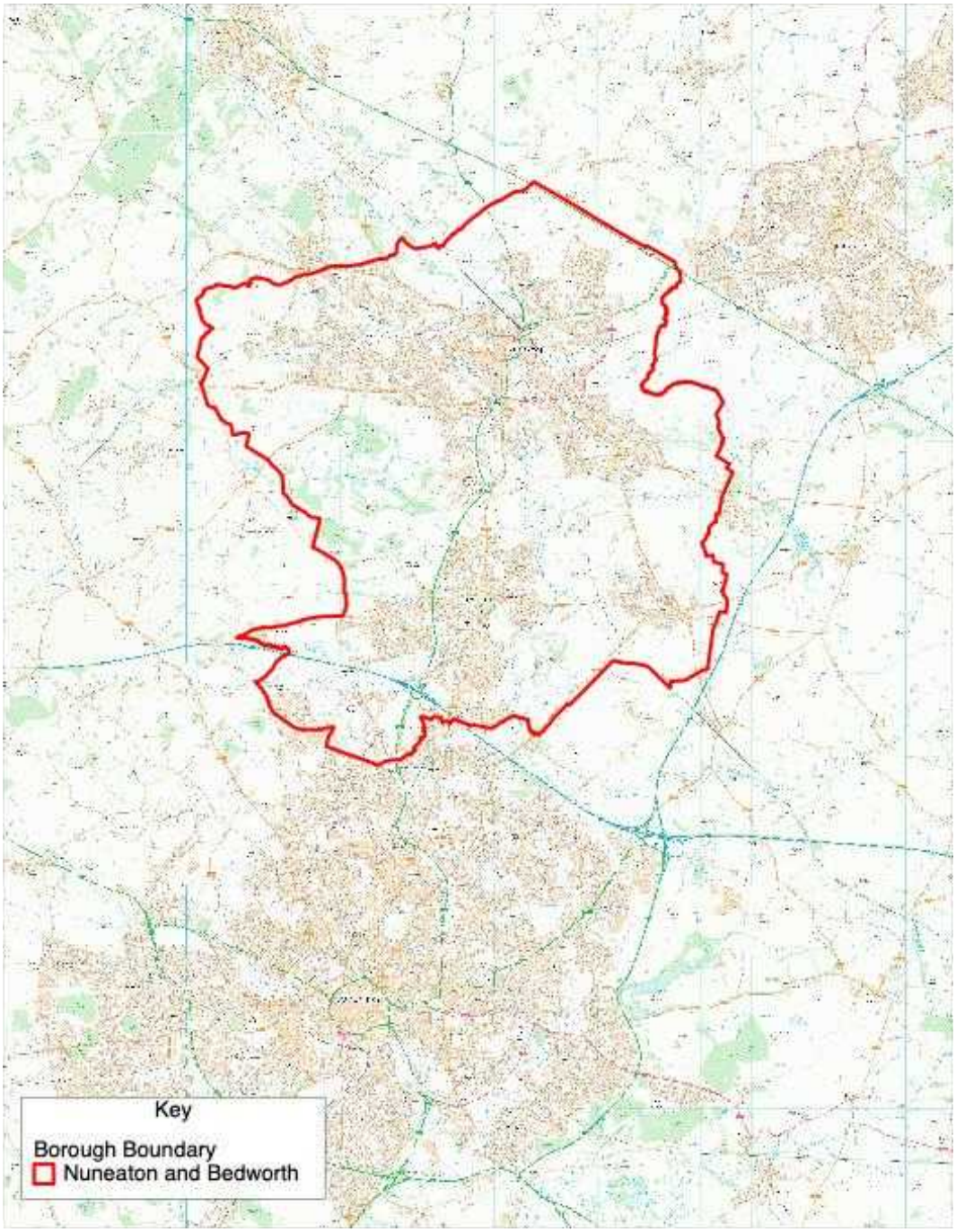
~~(52) PEARL BLAINLEY, No Fixed Abode~~

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

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

SCHEDULE 2 – MAP OF THE BOROUGH

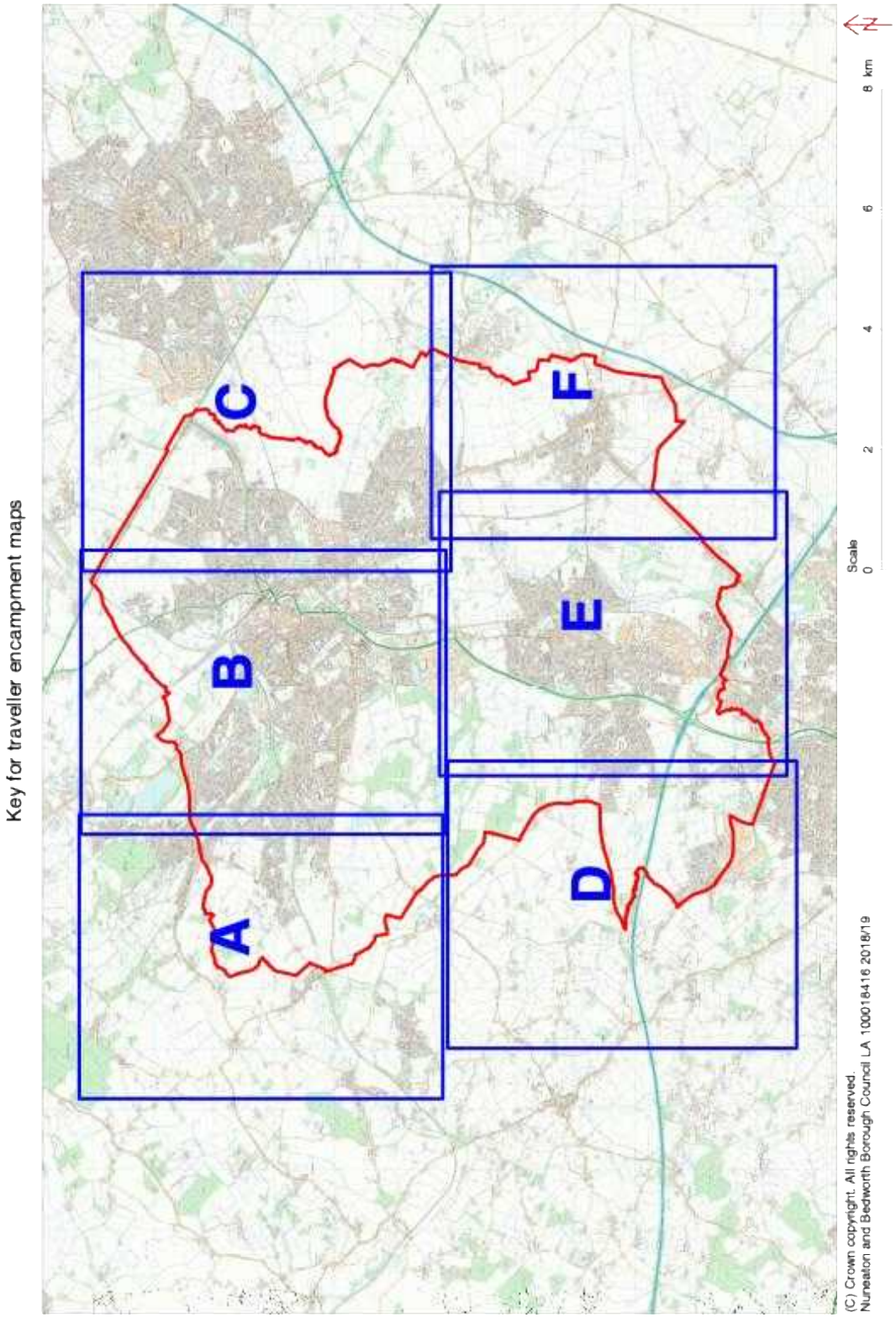
Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

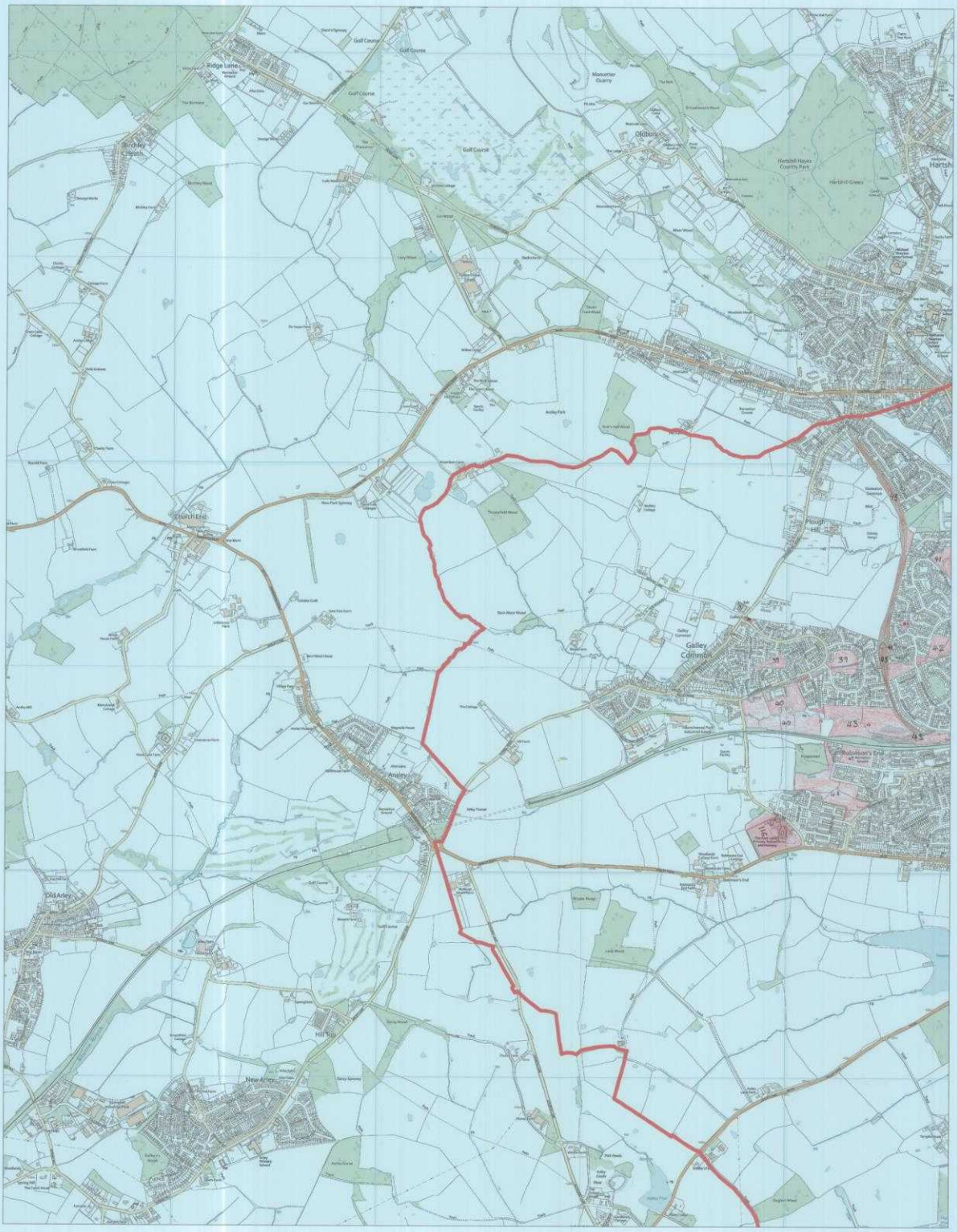
Not to scale

SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN



A

Northwest Nuneaton



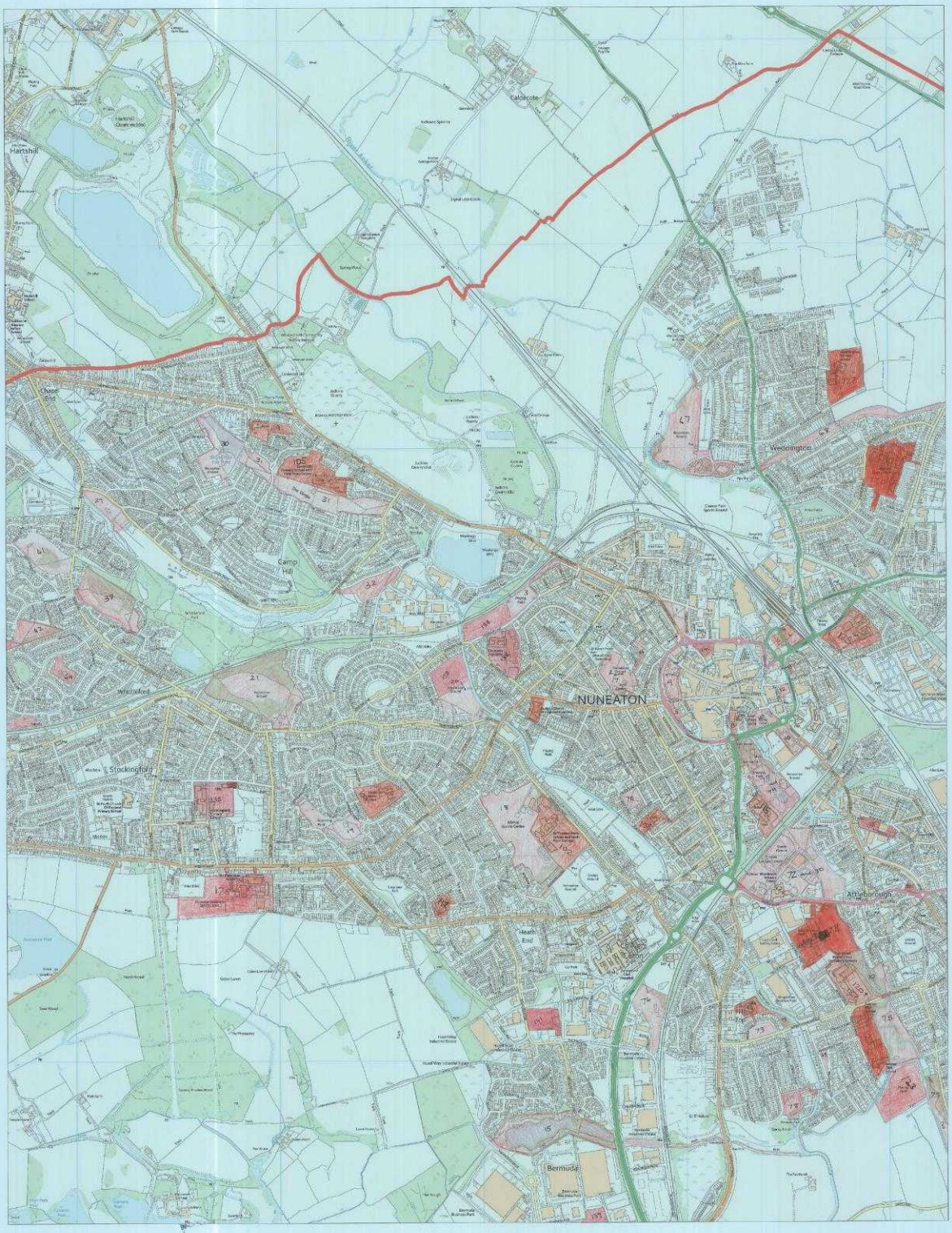
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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Scale
0 250 500 750 1000 m

N

B

North of Nuneaton



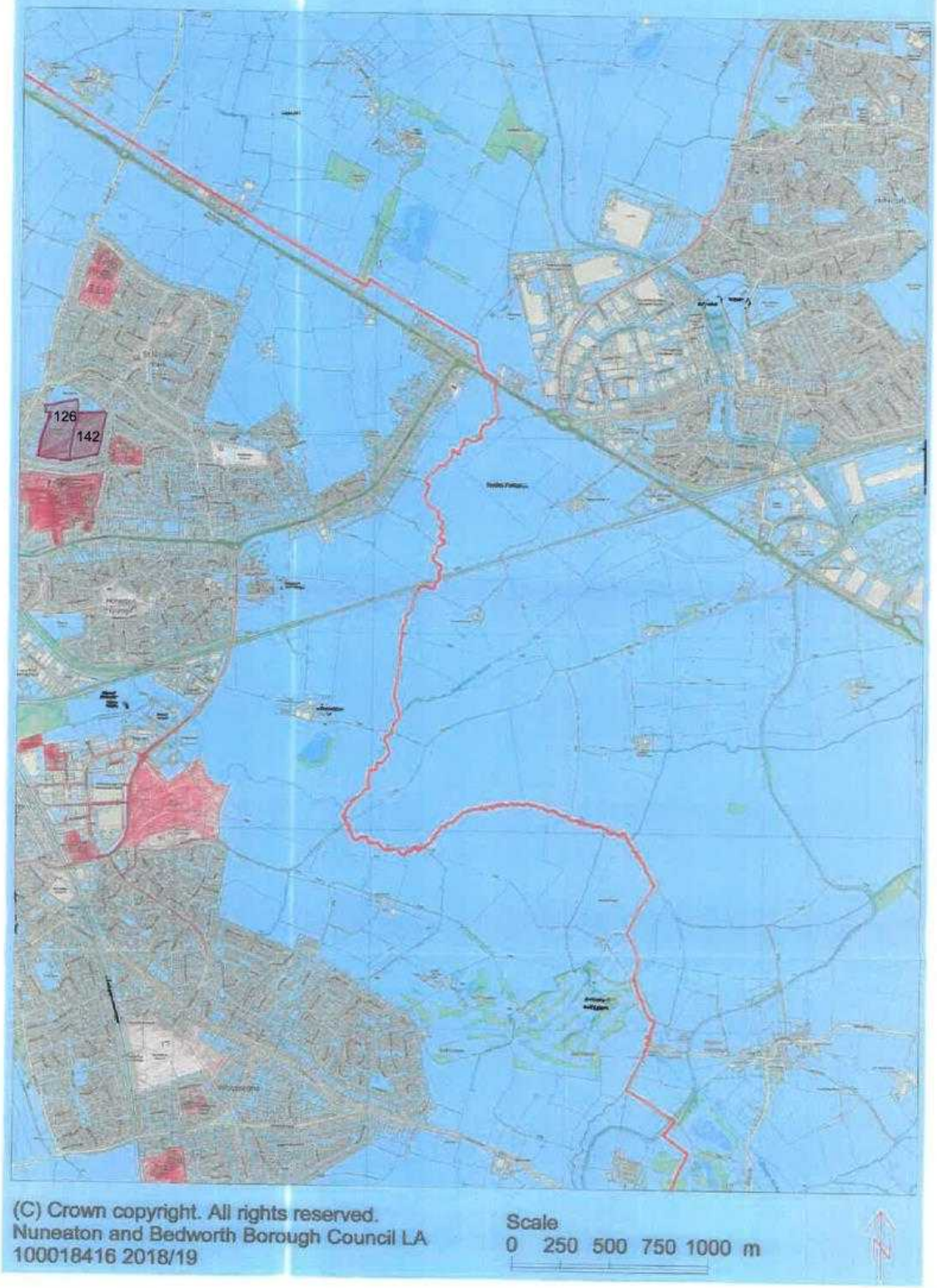
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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Scale
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N

C

Northeast Nuneaton

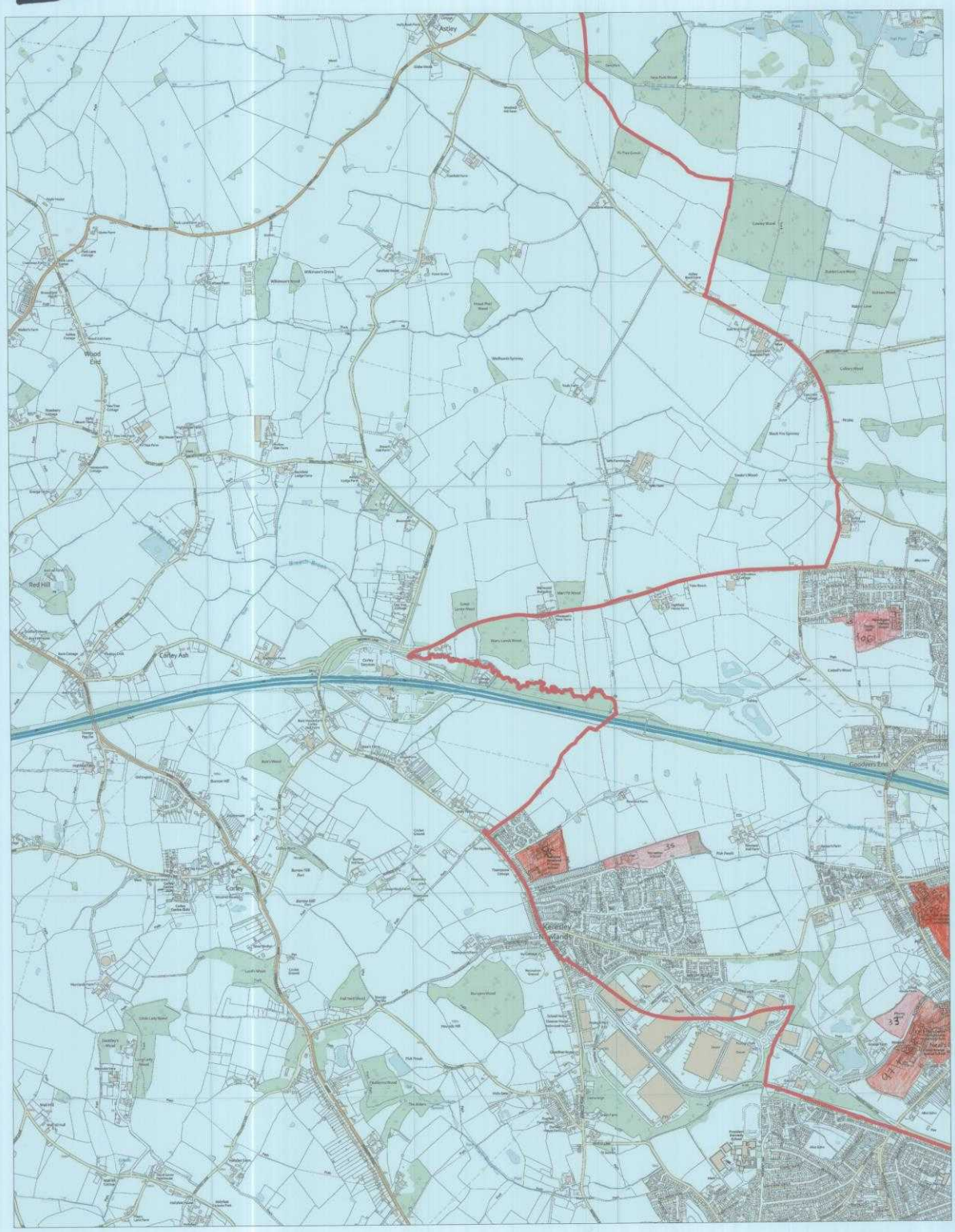


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Scale
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D

Southwest Bedworth



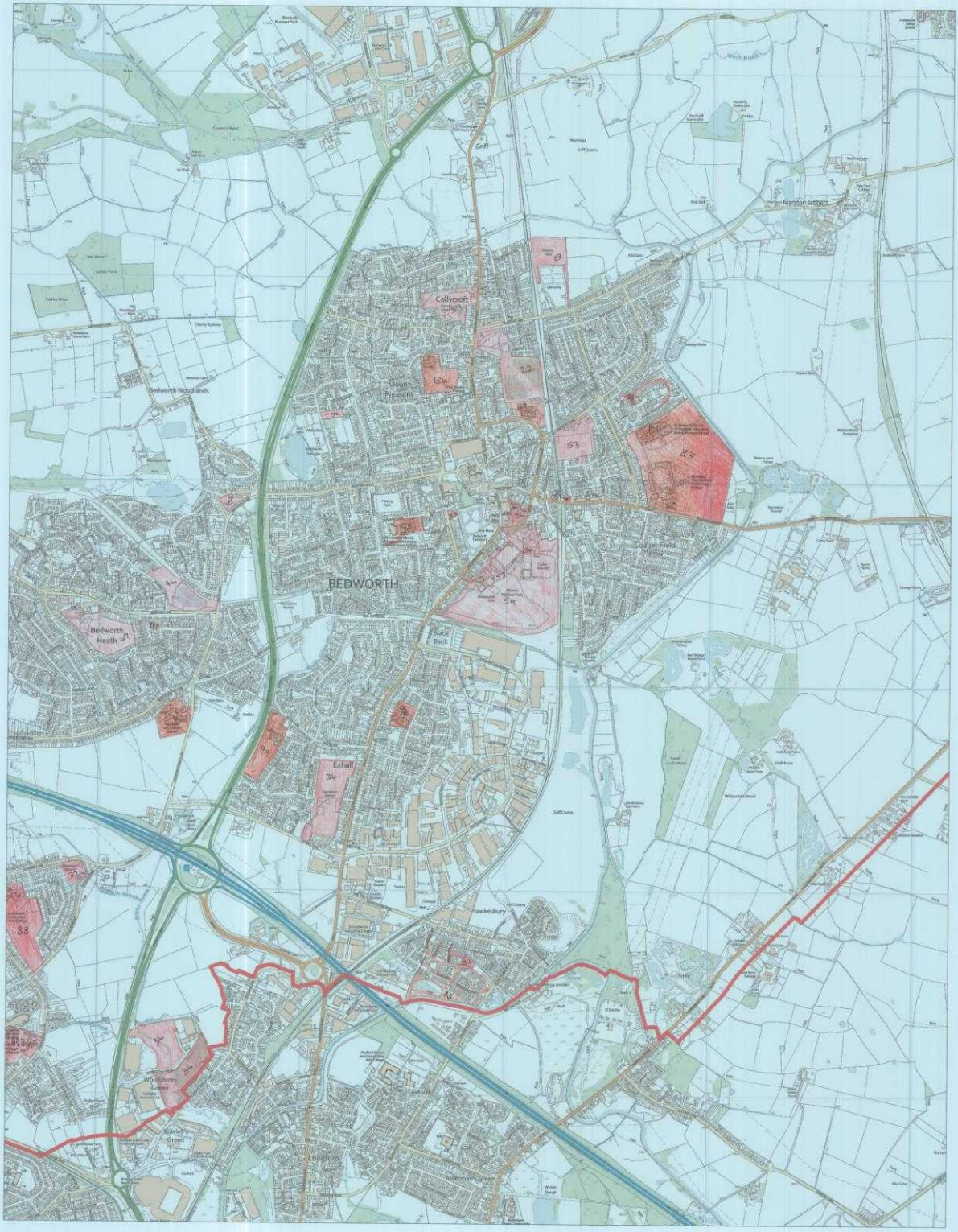
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100018416 2018/19

Scale
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N

E

South of Bedworth

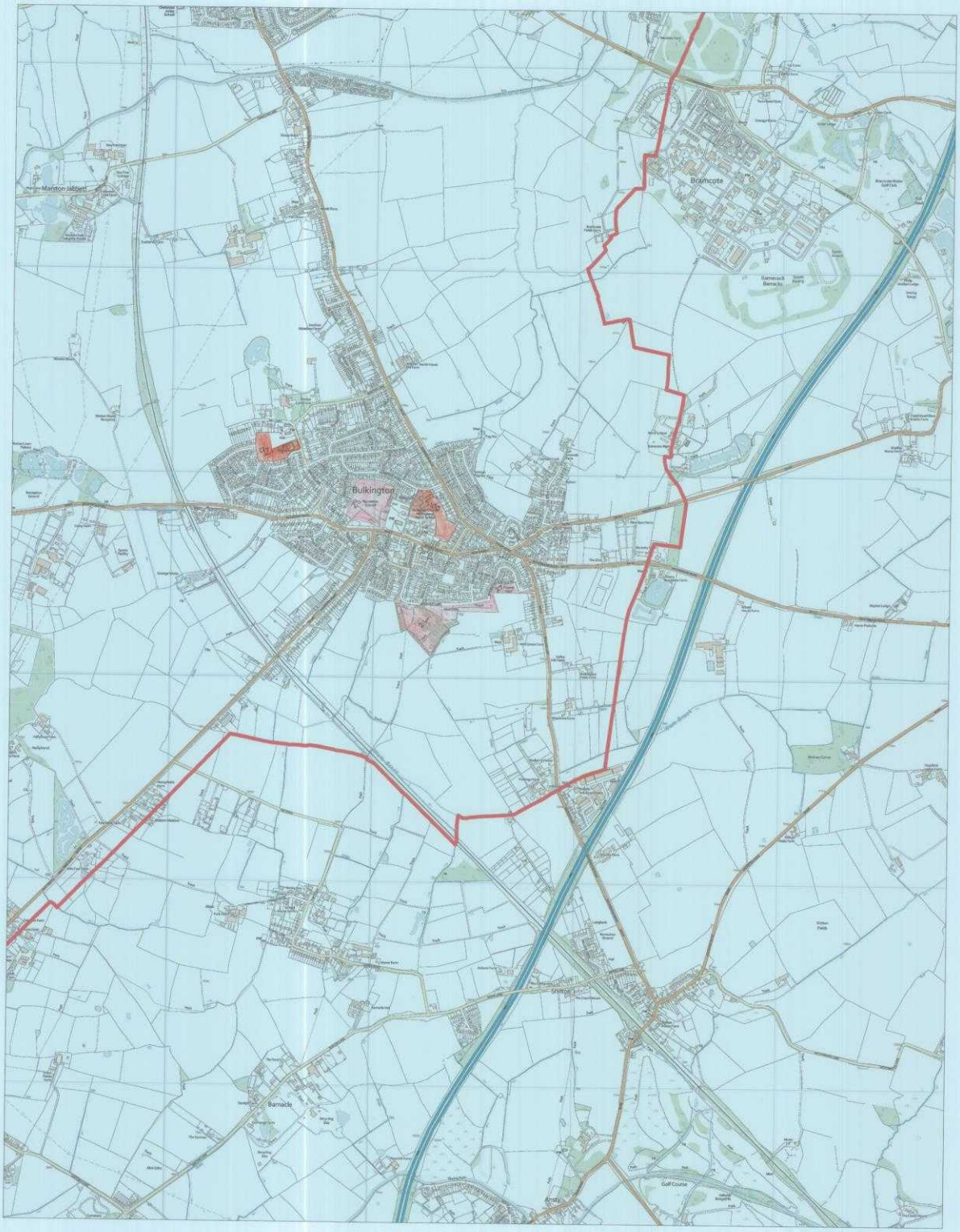


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Scale
0 250 500 750 1000 m

F

Southeast Bedworth



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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Scale
0 250 500 750 1000 m

SITE NUMBER	MAP SITE APPEARS ON	
1	B	Land on the north side of Corporation Street, N
2	B	Recreation ground lying to the north of Queens Bank St)
3	B	Land on the north west of Vernons Lane and la Stanley Road/Vernons Lane Recreational Grou
4	B	Land being car park on the south west side of Park)
5	B	Victoria Street Car Park and 60 Victoria Street,
6	B	Joinery works and adjacent premises fronting F
7	B	Land on the west and east sides of Vicarage S
8	B	Riversley Park Clinic, Coton Road, Nuneaton,
9	B	Land and buildings on the east side of Broad S of Abbey Street (aka Abbey Street Car Park)
10	B	Land at Church Street, Nuneaton (aka Church
11	B	Land and buildings lying to the East of Coton F
12	B	Land at Vicarage Street, Nuneaton (aka Justic
13	B	Land at Coton Road, Nuneaton (aka Riverside
14	B	Meadow Court, Meadow Street, Nuneaton, (CV
15	B	Land to the south side of Bermuda/land lying to the west side of a road leading from Coventry t Bermuda Road, Nuneaton (aka Bermuda Bala
16	C	Recreation Ground at Easyboro Way, Nuneato
17	C	Land on south side of Lutterworth Road, Nunes
18	B	Land lying to the north east of Braemer Way, N Greenmoor Road & Land lying to the south eas
19	B	Land lying to the east of Westbury Road and L Marsdale Drive)
20	B	Land at Recreation Ground, Tomkinson Road,
21	B	Land at Whittleford Park, Haunchwood Road N (aka Whittleford Park)
22	E	Land on the south side of Marston Lane, Nune
23	E	Land on the north side of Marston Lane, Bedw
24	E	Spitalfields 1 and 2 (Car Park) - land lying to th Rye Piece Ringway, Bedworth & Zion Chaple,

25	E	Park Road (Car Park) - land on the east side of
26	F	Barnacle Lane EA - land to the south of Barnacl Bulkington, Bedworth
27	F	Land at Brewer Road, Bulkington, Bedworth and
28	F	Bulkington Recreation Ground, Bedworth Road,
29	B	Land on the south west side of Queen Elizabeth
30	B	Land on south east side of Green Lane, Nuneat Nuneaton (aka Stubbs Pool)
31	B	Land and buildings on the east side of Camp Hi Elizabeth Road, Nuneaton (aka The Dingle)
32	B	Land on the south side of Willow Road, Nuneat
33	D	Land on the West side of Blackberry Lane, Bed
34	E	Heckley Recreational Ground - land lying to the
35	D	Keresley Recreational Ground - Land lying to th
36	E	Land lying to the North West of Rowley's Green
37	E	St. Giles Recreational Ground - Land on the So the West of St Giles Road, Exhall
38	B	Land on the east side of Bucks Hill, Nuneaton (a
39	A	Land south-east of Hickman Road, Galley Comm
40	A	Nuneaton & North Warks Group Riding for Disa Campbell Close, Nuneaton and land at Galley C and Fields of the Nuneaton and North Warwicks
41	B/A	Land on the south west side of Selby Way, land east side of Merlin Avenue, south east side of F Hill (aka Freesland Rise)
42	B/A	Land on the east and west side of Sherbourne A Tree Farm EA)
43	A	Land on Galley Common, Nuneaton; land at Ga Hill Road, Stockingford (aka North Field)
44	B	Land on the south side of Sherbourne Avenue,
45	D	Land on the south side of Cardigan Road, Bedw
46	E	Land and Buildings at Market End Farm and Or
47	E	Newdigate Recreational Ground - Land at Smor
48	A	Land on the North side of Ansley Road, Stockin
49	A	Kingswood Road Recreational Ground - Land o
50	B	Stockingford Recreational Ground - Land on the east side of Grove Road, Nuneaton and land lyi
51	E	Bedworth Leisure Centre - Miners Welfare Park
52	E	Land lying to the West side of Blackhorse Road
53	E	Land on the North side of Bulkington Road and 34 Nuneaton Road, Bedworth (CV12 8AL) and Centre, Johnson Road
54	E	Miners Welfare Park (Car Park) - Miners Welfar
55	E	Bedworth Leisure Centre (Car Park) - Miners W
56	E	Miners Welfare Park (Car Park) - Miners Welfar

57	E	Bedworth Railway Station (Car Park) - Land on
58	E	Land at Arbury Avenue, Bedworth (aka Arbury F
59	E	Collycroft Recreational Ground - Land lying to th to the west of Nuneaton Road/Alex Wilson Cent Nuneaton Road
60	E	Land on the north and south sides of Newtown I
61	C	Land lying to the north of Buttermere Avenue, N
62	C	Land at Horseton Grange, Nuneaton and land ly
63	C	Land lying to the south of Hinckley Road, Nunea
64	C	Recreation Ground, The Long Shoot, Nuneaton
65	C	Land at Horseton Grange and land to the south Way)
66	C	Land on the east side of Changebrook Close an
67	B	Land on the south side of Church Lane, Nuneat
68	B	Land on the north side of Brookdale Road, Nun (aka Coronation Walk)
69	B	Land at Bradestone Road, Nuneaton
70	B	Land on the north side of Donnithorne Avenue,
71	B	Land on the south side of Avenue Road, Nunea
72	B	Land on the north side of Avenue Road, Nuneat
73	B	Land on the north side of Donnithorne Avenue,
74	B	Marlborough Road Recreational Ground - Land
75	B	Land at Donnithorne Avenue, Nuneaton; land ly side of Marston Lane, Nuneaton and Land on th Marston Lane Fields)
76	B	Land lying 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, Cotc
80	B	Land on the north side of Avenue Road, Nuneat
81	C	Crowhill Recreation Ground - Land lying to the e
82	B	Trinity Court Flats (Car Park) - land on the West
83	E	Land at Acacia Crescent, Bedworth
84	B	Land at Dunns Close, Nuneaton
85	E	Land lying to the West of Blackhorse Road, Bed
86	C	Attleborough Fields Farm, Nuneaton and Land a Nuneaton
87	E	Nicholas Chamberlaine School, Bulkington Roa
88	D/E	Ash Green Sports & Arts College, Ash Green La
89	E	Race Leys Infant School, Bedworth
90	E	Goodyers End County First School, Bowling Gre
91	E	All Saints Bedworth C of E Primary School and

92	F	Arden Forest Infant School - aka Land on the W
93	E	The Cannons C of E Primary School - aka Land
94	E	Exhall Cedars Infant School - aka Land lying to
95	D	Keresley Newland Primary Academy and Keres 8JZ)
96	D	Newdigate Primary School and Nursery - aka La Bedworth and Land lying to the South of smorra
97	D/E	Wheelwright Lane Primary School, Ash Green,
98	E	St Francis Roman Catholic School, Nicholas Str
"		Land lying to the North of Rye Piece Ringway, E
"		Land on the East Side of Nicholas Street, Bedw
99	E	St Giles Junior School Bedworth - aka Land on
100	F	St James Church of England School, Barbridge
"		Playing fields at St. James Church of England J 9PF
101	E	St Michael' s Primary School, Hazel Grove, Bed
102	B	Land adjoining St Thomas More Catholic Schoo 7EX
"		St Thomas More Catholic School, Greenmoor R
"		Arbury High School, Greenmoor Road, Nuneato
103	B	Abbey Cof E Infant School, Nuneaton
104	B	All Saints C of E Primary School & Nursery, Kne
105	B	Camp Hill Primary School, aka Land to the Sout
106	C	Chetwynd Junior School, aka Land lying to the S
107	B	Land at Judkins Quary Tuttle Hill, Nuneaton (ak
108	B	Chilvers Coton Community Infant School, Frank
109	B	Croft Junior School, aka Land lying to the west
110	B	Galley Common Infant School, Nuneaton
111	C	Milby Primary School, aka Land lying to the Eas
112	B	Glendale Infant School, aka Land on the south s
113	B	Middlemarch School, Nuneaton
114	B	Stockingford Junior And Infant School, Grove R
"		Land and buildings on the south side of St Paul'
115	B	Our Lady of the Angels Infant School and St Jos
"		Our Lady of the Angels Infant School and St Jos
116	A	Park Lane Primary School, Park Lane, Nuneato Nuneaton
"		Land on the North Side of Ansley Road, Nuneat
117	B	Queens County Junior and Infant School, Bentl
118	B	St Pauls C of E Primary School, Nuneaton
119	B	Land at St Anne's RC Primary School, Camp Hi
"		St. Anne's Roman Catholic Primary School, Car
120	B	Oakwood Primary School, Morris Drive, Nuneat

"		Oakwood Secondary School, Morris Drive, Nuneaton			Private	WK468048
"		Oakwood Primary School, Morris Drive, Nuneaton, CV11 4QH			WCC	WK233776
121	C	Playing field adjoining St Nicholas C of E Primary School, Windemere Aveneue, Nuneaton CV11 6HJ	×	CV11 6HJ	WCC	WK473130
"		Land on the East Side of Windermere Avenue, Nuneaton			Private	WK131856
"		St Nicolas C of E First School, Windermere Avenue, Nuneaton, CV11 6HJ			Private	WK473119
122	B	Weddington Primary School, aka Land lying to the North East of Oakdene Crescent, Nuneaton	✓	CV10 0DR	WCC	WK149023/WK216447
123	B	Land at George Eliot School, Raveloe Drive, Nuneaton, CV11 4QP	✓	CV11 4QP	Private	WK458966
124	B	Wembrook Primary School, aka Land on the North Side of Avenue Road, Nuneaton	✓	CV11 4LU	NBBC	WK448965
125	B	Etone College, Leicester Road, Nuneaton, CV11 6AA	✓	CV11 6AA	WCC	WK425515
126	B	Higham Lane School, Higham Lane, Nuneaton, CV10 0BJ	✓	CV10 0BJ	Private	WK465311
127	B	Oakwood Primary and Secondary School, Morris Drive, Nuneaton, CV11 4QH	✓	CV11 4QH	WCC	WK468047/WK468048/WK233776
128	B	The Nuneaton Academy, aka Land lying on the South of Arbury Road, Nuneaton and Nuneaton Academy, Rad	✓	CV10 7PD	WCC	WK175243/WK425489
129	C	North Warwickshire and Hinckley College, Hinckley Road, Nuneaton, CV11 6BH	✓	CV11 6BH	Private	WK428695
130	B	King Edward VI College, King Edward Road, Nuneaton, CV11 4BE	✓	CV11 4BE	Private	WK497842/WK497832
131	E	Bedworth Heath Nursery School, Glebe Avenue, Bedworth, CV12 0DP	×	CV12 0DP	WCC	WK426282
132	D	Exhall Grange School and Science College, Wheelwright Lane, Bedworth			WCC	WK426690
"		Exhall Grange Special School, Wheelwright Lane, Coventry			Private	WK440475
"		Land at Exhall Grange School, Wheelwright Lane, Coventry, CV7 9HP	✓	CV7 9HP	Private	WK450903
133	E	Quest Academy, North Side of Griff Lane, Nuneaton	✓	CV10 7SD	WCC	WK365844
134	E	Race Leys Junior School, Bedworth aka Land lying to the West of Leicester Road, Nuneaton	×	CV12 8AG	WCC	WK240628
"		Race Leys Middle School, Barton Road, Bedworth, CV12 8HG		CV12 8HG	Private	WK465841
135	B	Stockingford Primary School, aka Land and buildings on the south side of St Paul's Road, Nuneaton			WCC	WK380085
"		Stockingford Junior And Infant School, Grove Road, Nuneaton (CV10 8JY)	✓	CV10 8JH	WCC	WK42667
136	C	Whitestone Infant School, aka Land on the South West Side of Magyer Crescent, Nuneaton	×	CV11 4SQ	WCC	WK23140
137	B	Attlebrough Mills, Attleborugh Road, Nuneaton (aka Holman Way)	×		Private	WK256088
138	B	The Discovery Academy, aka Manor Park Community School, Beaumont Road, Nuneaton	×	CV11 5SS	Private	WK430022
139	B	St Davids Way Hub, St Davids Way, Bermuda Park, Nuneaton	✓	CV10 7SD	Private	wk447390
140	B	Halfords - land and buildings on the south side of Newtown Road, Nuneaton	×	CV11 5UT	Private	WK390614
141	B	Bermuda Road Community Centre, Bermuda Road, Nuneaton (aka Bermuda Phoenix Centre)	✓	CV10 7HU	Private	WK474729
142	C	Land on the North Side of Ambleside Way, Nuneaton CV11 6AT (aka Ambleside Community Sports Club)	✓	CV11 6AT	Private	WK392039/WK57909

IN THE HIGH COURT OF JUSTICE **Claim No: QB-2019-000616**
KING'S BENCH DIVISION

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP2/3'

IN THE HIGH COURT OF JUSTICE Claim Number: QB-2019-000616

QUEEN'S BENCH DIVISION

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

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

On the 19th day of March 2019



BETWEEN

(1) NUNEATON AND BEDWORTH BOROUGH COUNCIL

(2) WARWICKSHIRE COUNTY COUNCIL

Claimants

-and-

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

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

Defendants

ORDER

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

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

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

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

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST FOR BREACH OF PARAGRAPHS 1-6 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 6 OF THIS ORDER MAY BE ARRESTED AND BROUGH BEFORE THE COURT

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

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

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

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

IT IS ORDERED THAT:

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

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

2. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council unless authorised to do so by the owner of the land.

3. Setting up an encampment on any land within the administrative boundaries of Nuneaton and Bedworth Borough Council without written permission from the Local Planning Authority, or, planning permission granted by the Secretary of State.

4. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for Thomas Corcoran (the First Defendant) and his wife Jessica Dodds (the Second Defendant) and any other family member agreed with the First Claimant for the purpose of accessing medical care for their daughter Maureen Corcoran.

5. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.

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

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

7. Setting up an encampment on any land identified on the attached map and list of sites without written permission from the local planning authority, or, planning permission granted by the Secretary of State.

8. From entering and/or occupying any part of the land identified on the attached map and list of sites for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia.

9. From bringing onto the Land or stationing on the Land any caravans/mobile homes other than when driving through the administrative boundaries of Nuneaton and Bedworth Borough Council or in compliance with the parking orders regulating the use of car parks or with express permission from the owners of the land.

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

11. There be a power of arrest attached to prohibitions 2-~~10~~6 of this order.

The Land in this order means:

12. For the First to Fifty-Third Defendants, all land within the administrative boundaries of Nuneaton and Bedworth Borough Council as appears within the marked red outline on the attached map at Schedule 2 of this Order. The said map clearly identifies the boundaries of the Borough of Nuneaton and Bedworth correctly and the principal towns and settlements within the Borough.

13. For Persons Unknown (the Fifty-Fourth Defendant) all the land marked on the map at Schedule 3 of this Order and identified by the key to the map and numbered 1 to 141, further details of which are on the list at Schedule 3 of this Order.

14. Service of this Order shall be by affixing a copy of this Order in a transparent envelope, or laminated copy, in a prominent position on the land.

15. The Defendants may each of them, or anyone notified of this Order, apply to the Court on 72 hours written notice to the Court and the Claimant to vary or discharge this order (or so much of it as affects that person)

16. Costs reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

18. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

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

INTERPRETATION OF THIS ORDER

20. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.

21. A requirement to serve on "the Defendants" means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.

22. An Order requiring the Defendants to do or not to do anything applies to all Defendants.

23. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

COMMUNICATIONS WITH THE COURT

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

SCHEDULE 1 – LIST OF DEFENDANTS

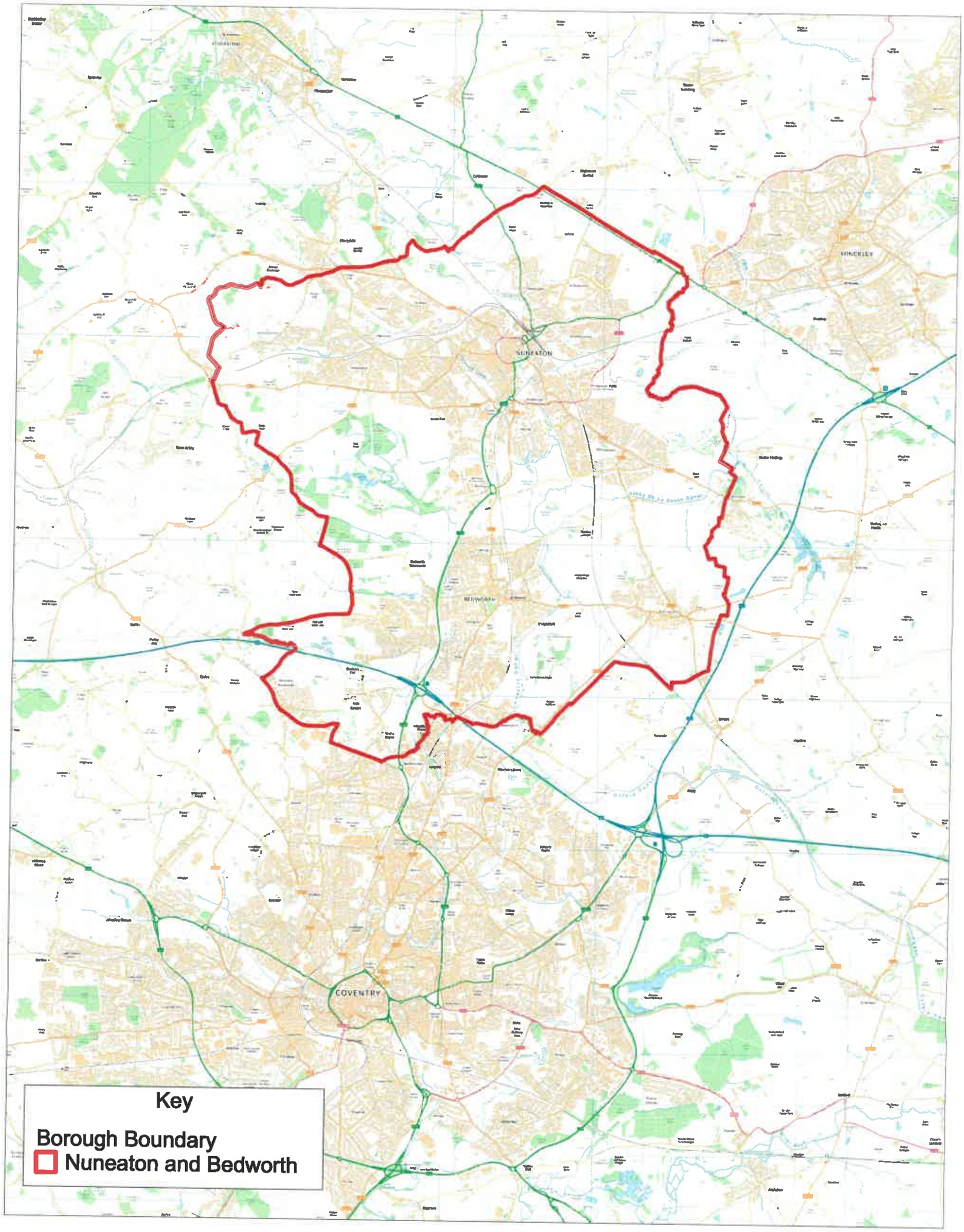
List of Defendants and their addresses

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

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

SCHEDULE 2 – MAP OF THE BOROUGH

Nuneaton and Bedworth Borough Boundary



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Nuneaton and Bedworth Borough Council LA
100018416 2018/19

Not to scale

SCHEDULE 3 – LIST OF SITES AND MAP FOR PERSONS UNKNOWN

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

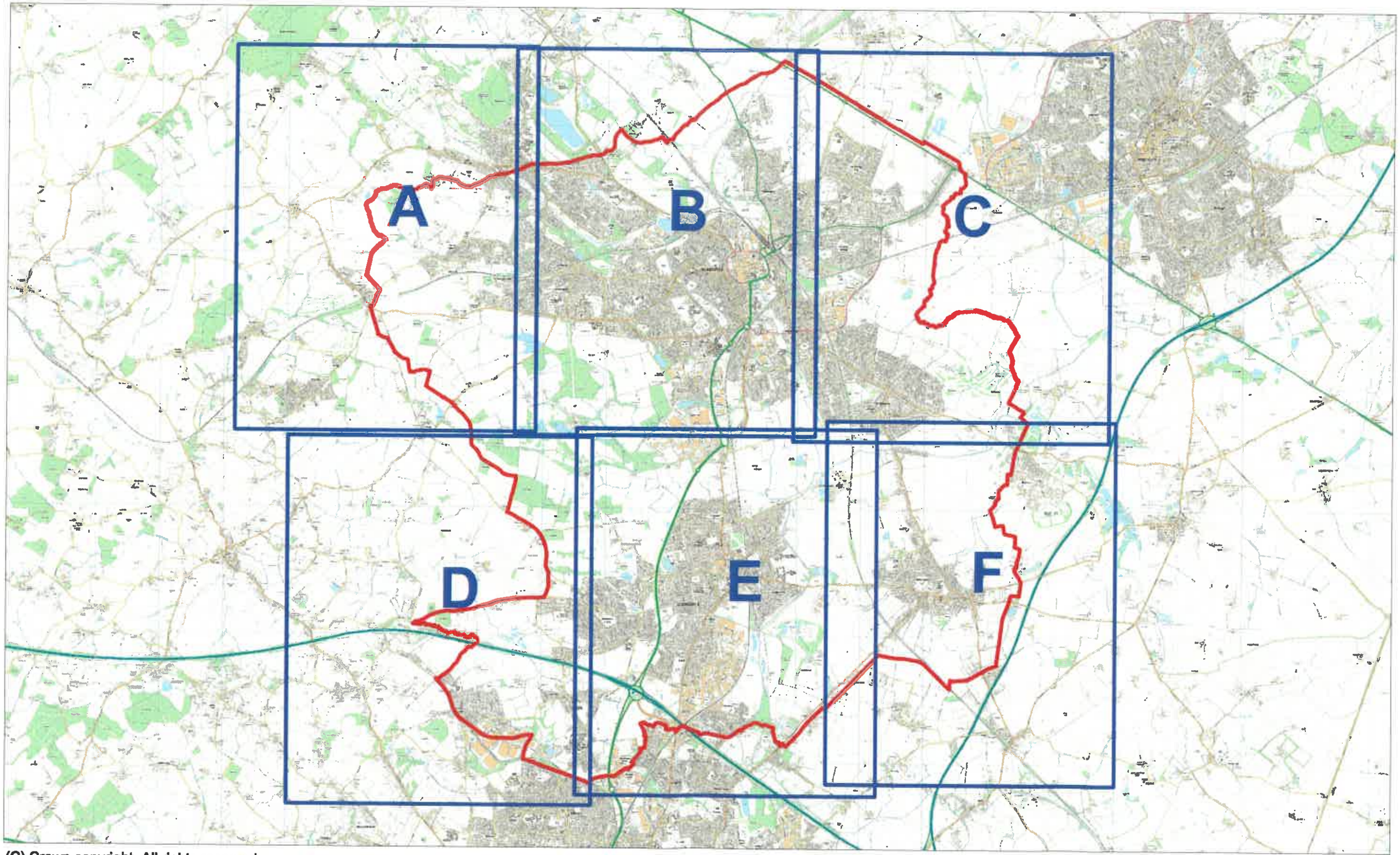
27	F	Land at Brewer Road, Bulkington, Bedworth and land at Eustace Road, Bulkington, Bedworth	×	CV12 9RF	NBBC	WK448510/ WK448500
28	F	Bulkington Recreation Ground, Bedworth Road, Bulkington, Bedworth, (CV12 9PZ)	✓	CV12 9LT	NBBC	WK449849
29	B	Land on the south west side of Queen Elizabeth Road, Nuneaton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

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

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

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

Key for traveller encampment maps

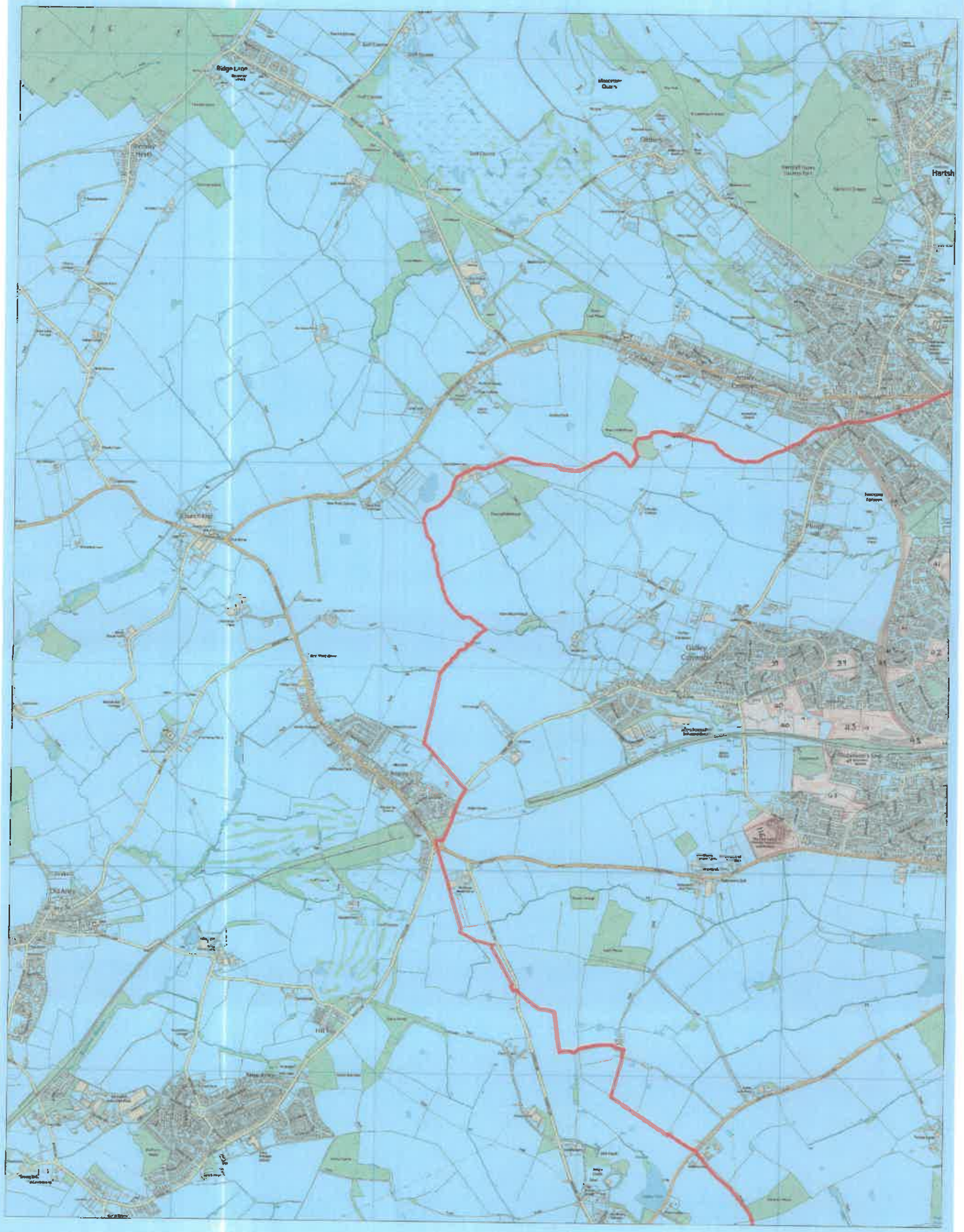


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A

Northwest Nuneaton

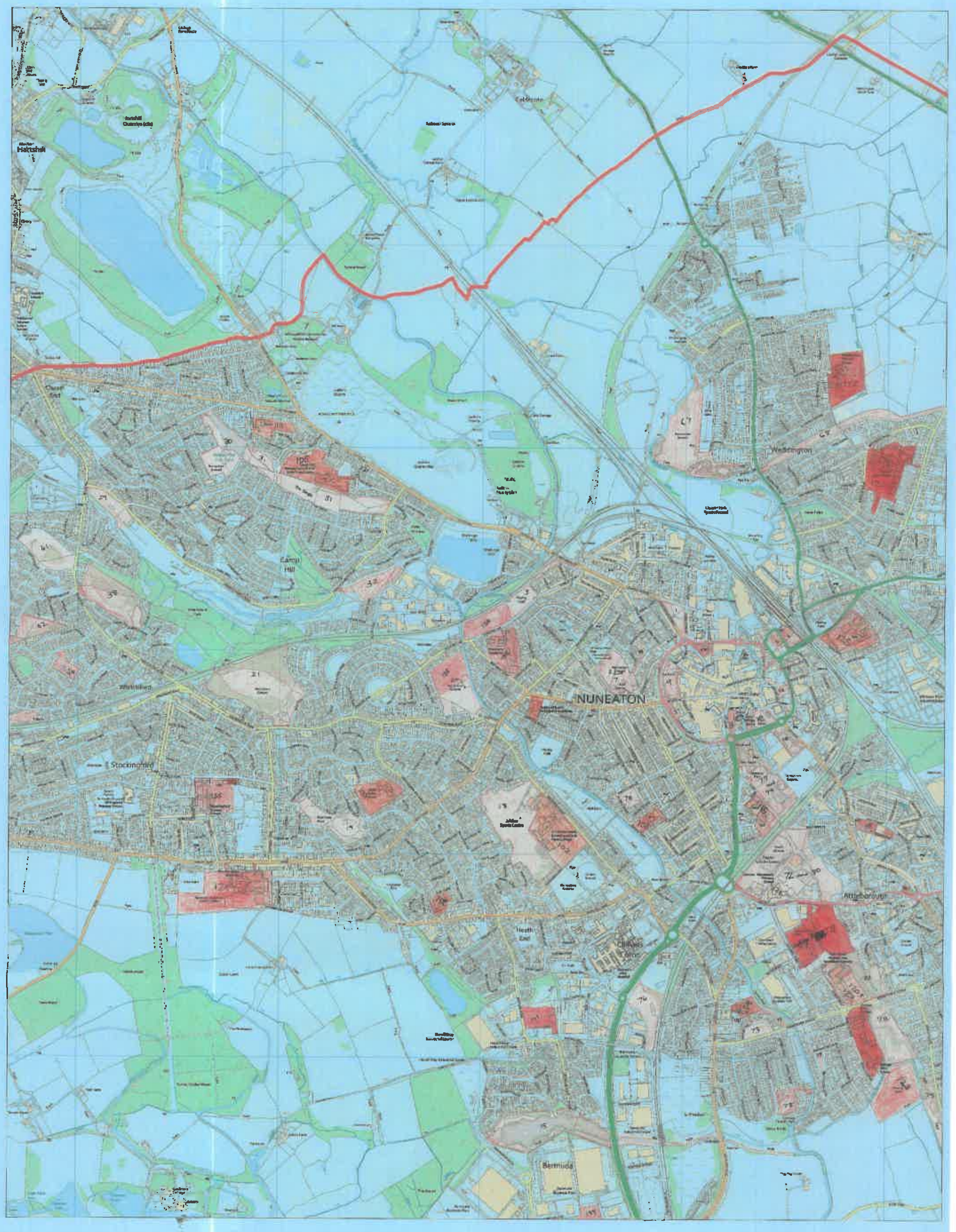


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North of Nuneaton



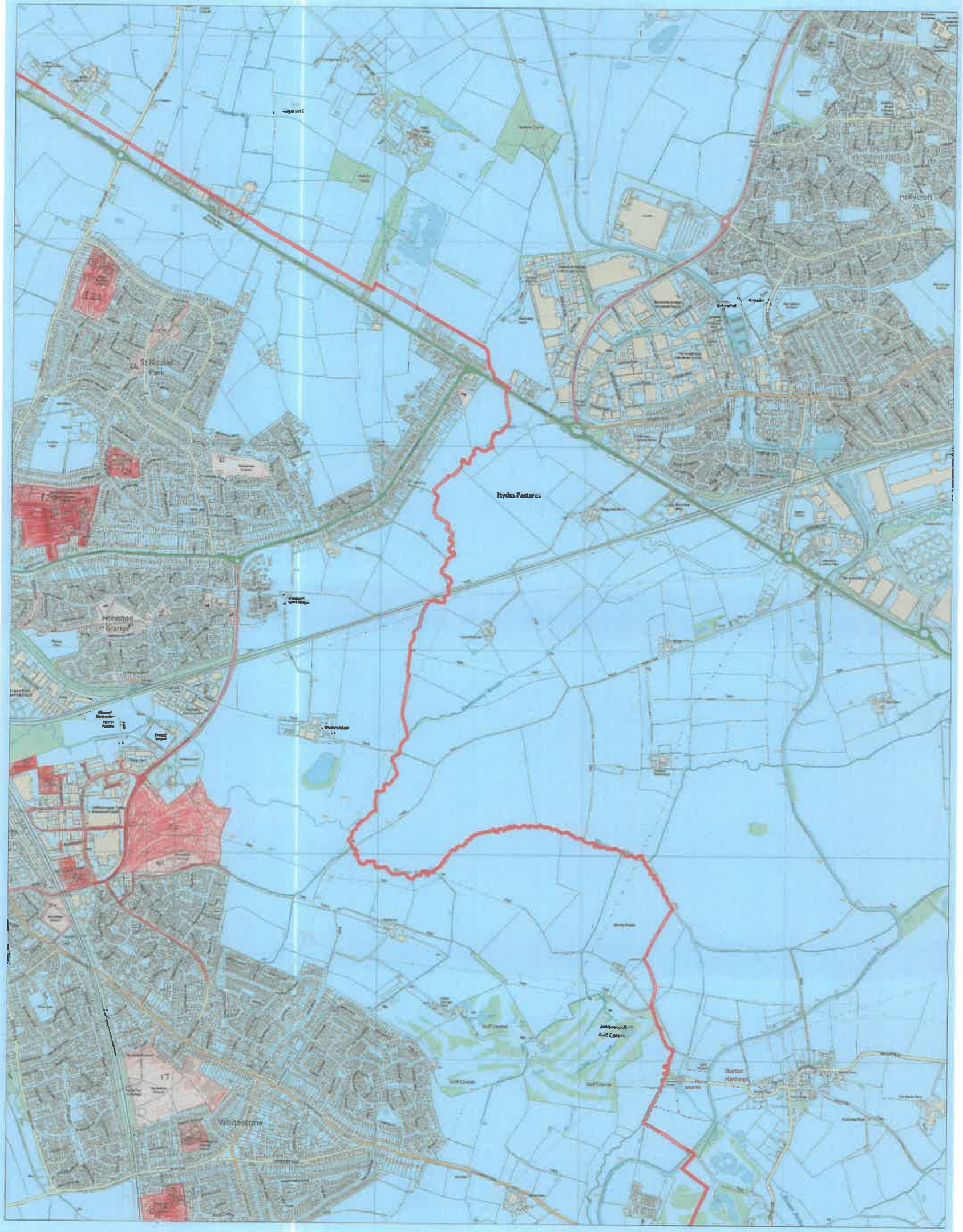
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C

Northeast Nuneaton

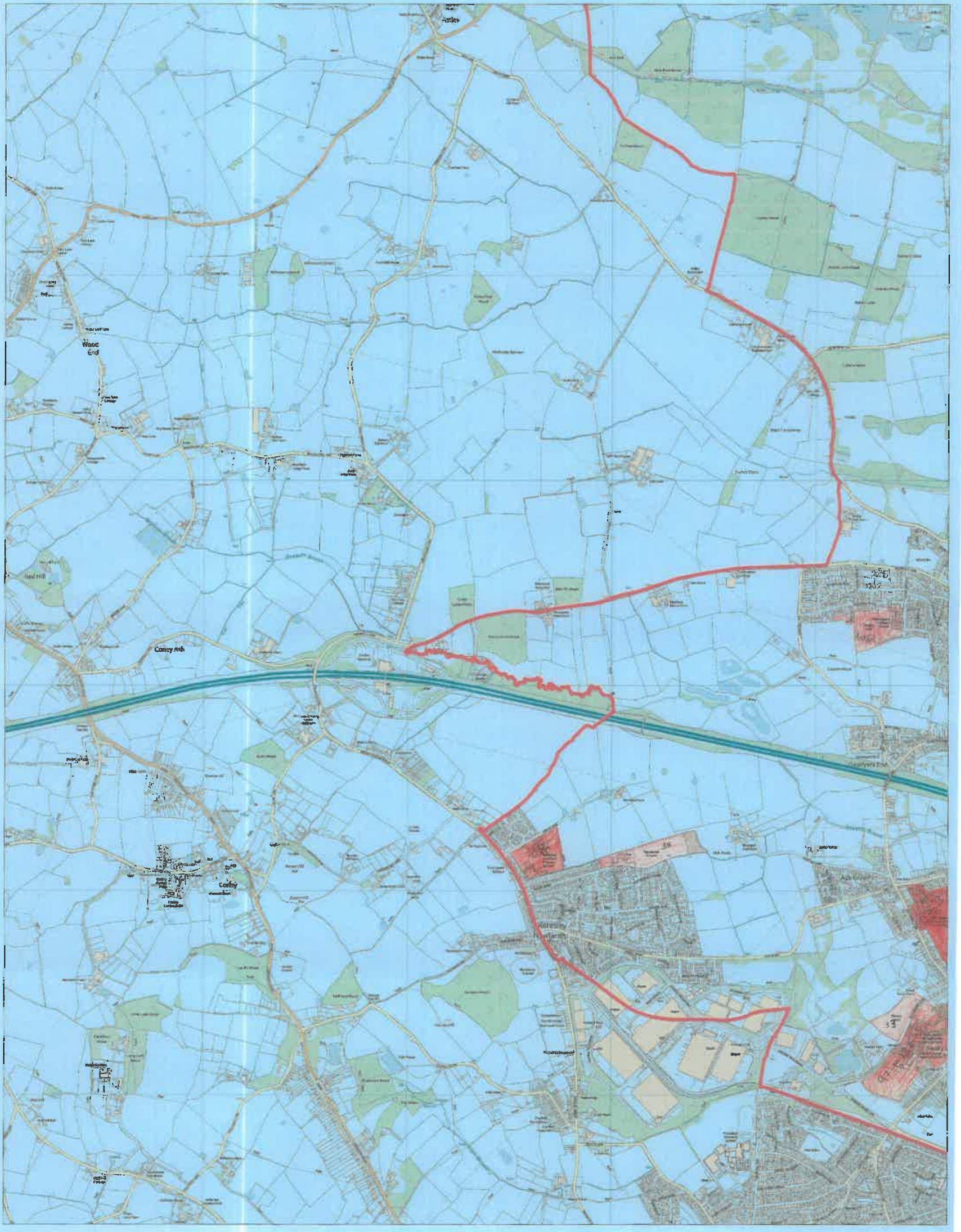


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Southwest Bedworth



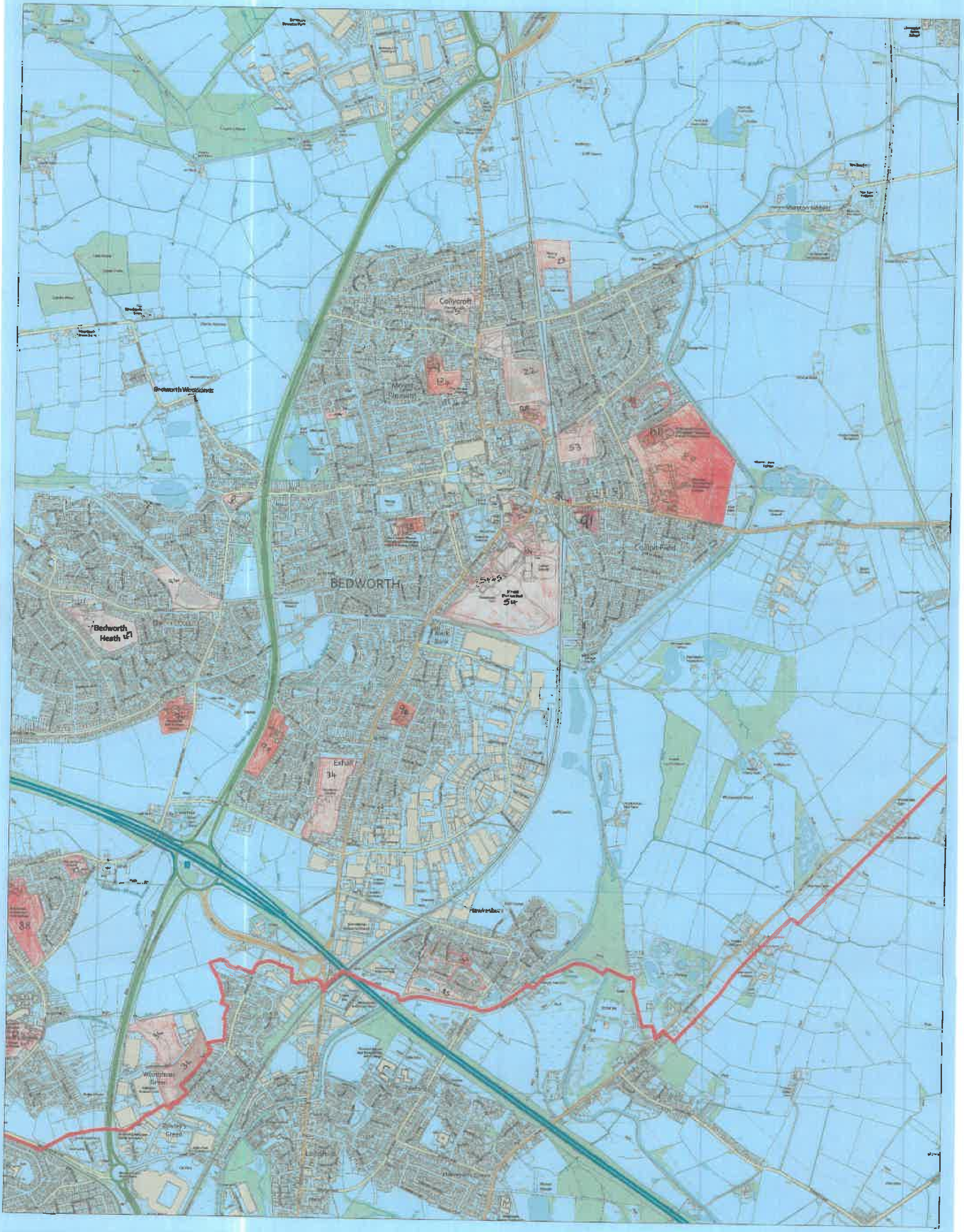
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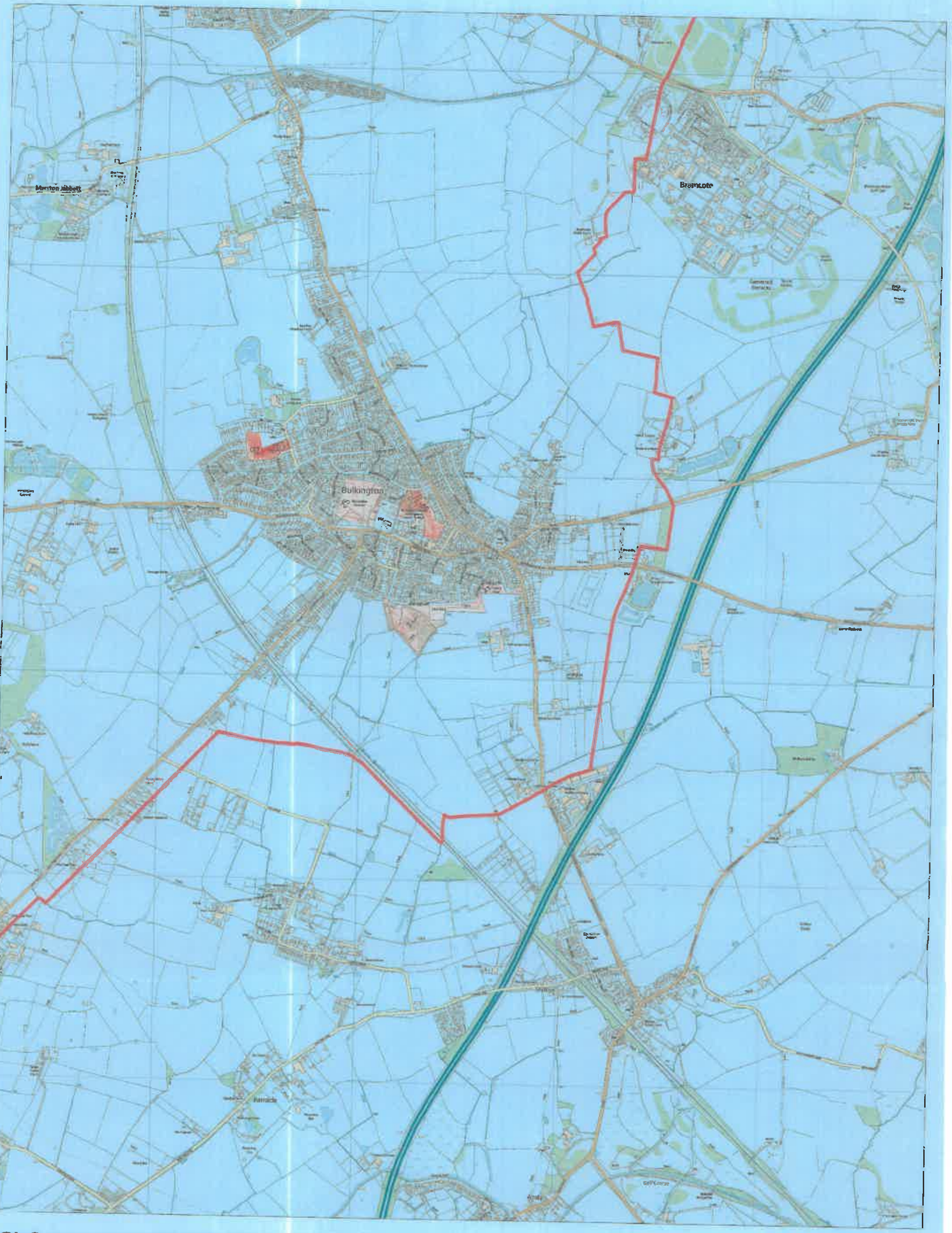
South of Bedworth



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F

Southeast Bedworth



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Scale
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N

100

IN THE HIGH COURT OF JUSTICE **Claim No: QB-2019-000616**
KING'S BENCH DIVISION

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP2/4'

The Warwickshire Protocol 2025

Countywide process of dealing with Unauthorised Encampments in Warwickshire

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1. Introduction

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

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

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

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

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

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

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

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

2. Initial Actions

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

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

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

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

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

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

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

3. Communication

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

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

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

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

3.5. Consistency of communication is key to ensuring that conflicting information is avoided. It is preferable that there should be one central ‘hub’, to which agencies can signpost the public towards and from which updates can be shared. The Warwickshire County Council unauthorised traveller sites web page at:- http://www.warwickshire.gov.uk/travellerunauthorisedsites is the suggested basis for such an information hub, particularly as it allows the public to report encampments online and then be kept directly updated on progress. Local authorities can send updates direct to the WCC Gypsy and Traveller Liaison Team who will then update the web site.

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

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

4. The Law

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

- **Common Law** – can be used by the landowner to regain possession of the land; does not require use of a court; enforced by the landowner or private bailiffs; has no sanctions should trespassers return. This option is available to public bodies but government policy discourages its use.

- **Part 55 Civil Procedure Rules** – can only be used by the landowner to regain possession of the land; requires a civil court procedure; possession can be enforced by county court bailiffs; no sanctions should trespassers return unless means have been adopted to identify the persons unknown. Sanctions become unavailable after the 3 month period where the court order is valid expires.

- **Sections 77 – 78 Criminal Justice and Public Order Act 1994** – can only be used by a local authority on land forming part of the Highway, unoccupied land or occupied land without the consent of the occupier; used to remove identified individuals; magistrates court required when those directed do not leave; possession enforced by local authority; return of campers and or their vehicles within three months carries criminal sanctions.

- **Section 60c Criminal Justice and Public order Act 1994.**
  Brought about by the Police, Crime, Sentencing and Courts Act 2022-
  (**Residing on land without consent in or with a vehicle).**
  A person aged 18 or over resides or intends to reside on land without consent of the occupier of the land;
  - *They have, or intend to have, at least one vehicle with them on the land;*
  - *They have caused or are likely to cause significant damage, disruption or distress;*
  - *They, without reasonable excuse:*
  - *Fail to leave the land and remove their property following a request to do so by an occupier of the land, their representative or a constable; or*
  - *Enter or, having left, re-enter the land with an intention of residing there without the consent of the occupier of the land, and with an intention to have at least one vehicle with them, within 12 months of a request to leave and remove their property from an occupier of the land, their representative or a constable.*
  - *Reasonable suspicion that a person has committed this offence confers power on a constable to seize their vehicle/other property for up to three months from the date of seizure or, if criminal proceedings are commenced, until the conclusion of those proceedings.*

- **Sections 61 – 62 Criminal Justice and Public Order Act 1994** – Following the PCSC Act 2022 amendments, police are able to use these powers on any land including the highway; to direct that persons leave the land and remove any vehicles they have with them or any other property and a failure to do so or a return to the land within twelve months empowers a police constable to seize and remove that vehicle; it is not only triggered where there are two or more persons trespassing with 6 or more vehicles but can be triggered where there are two or more persons trespassing and that any of those persons trespassing has caused damage to the land or to property on the land or where they have used threatening, abusive, insulting words or behaviour towards the occupier of the land, a member of the occupier's family or an employee or agent of the occupier; does not require the courts; possession enforced by police; return within twelve months –criminal sanctions.

- **Section 62A-E Criminal Justice and Public Order Act 1994** – can be used by a senior police officer to direct 1 or more trespassers to leave land and take any vehicles with them, but where it appears that the trespassers are in possession or control of caravans, there has to be a suitable pitch available on a relevant site before such a direction can be delivered; can be used on any land; is used for identified individuals and or their vehicles; does not require the courts; possession enforced by the police; return to the local authority area within three months – criminal sanctions.

- **Injunction** - Can be drafted to prohibit named individuals from engaging in certain activities or behaviours or protecting vulnerable pieces of land within Districts or Boroughs throughout the County. Some local authorities have obtained or considered this option which if available will be an option where appropriate and proportionate.

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

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

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

5. Data Protection

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

6. Post-Incident Debriefing

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

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

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

7. Summary

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

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

8. Review

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

The protocol will be reviewed every 24 months.

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

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

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

	Advisor Warwickshire Police.		

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

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

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

Appendix 2: Notification to Authorities of an Unauthorised Encampment

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

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

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

Appendix 3: Site Code of Conduct

Unauthorised Encampments

Code of Conduct

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

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

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

Appendix 4: Guidance Notes

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

(a). The purpose of this Code of Conduct is to build relationships between all relevant parties and encourage good social behaviours by members of the encampment. Active compliance and cooperation with this code and respect for the site and its neighbours is essential. It should be noted, however, that the literacy skills of members of unauthorised encampments can be varied. It cannot be assumed that by physically serving the Code, the process is complete.
Verbal explanation should be provided.

(b). Active compliance does not mean that the members of the encampment will automatically be offered a tolerated trespass arrangement. The period of stay will be determined by the land owner. It should be made clear that the failure to follow the Code of Conduct could result in enforcement action against any and all individuals.

(c). Enforcement may include the use of Community Protection Notices. These notices were introduced under the Anti-Social Behaviour, Crime & Policing Act 2014 to stop businesses, organisations or individuals over the age of 16 from committing anti-social behaviour which spoils the communities' quality of life. They can be used to deal with most problems or nuisances which negatively impact on or affect the community, by targeting those responsible.

(d). Evidenced breaches of the issued Code of Conduct may also change the initial response to the encampment and necessitate a revised course of action.

(e). The lead agency may give consideration to the installation of temporary bins and toilets.
Such measures could lead to cost savings in the longer term. However, it is fully recognised this is a decision for each local authority dependent on a range of local policy and cost recovery fact.

(f). Damage to property or the environment will not be tolerated. However, Warwickshire Fire

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

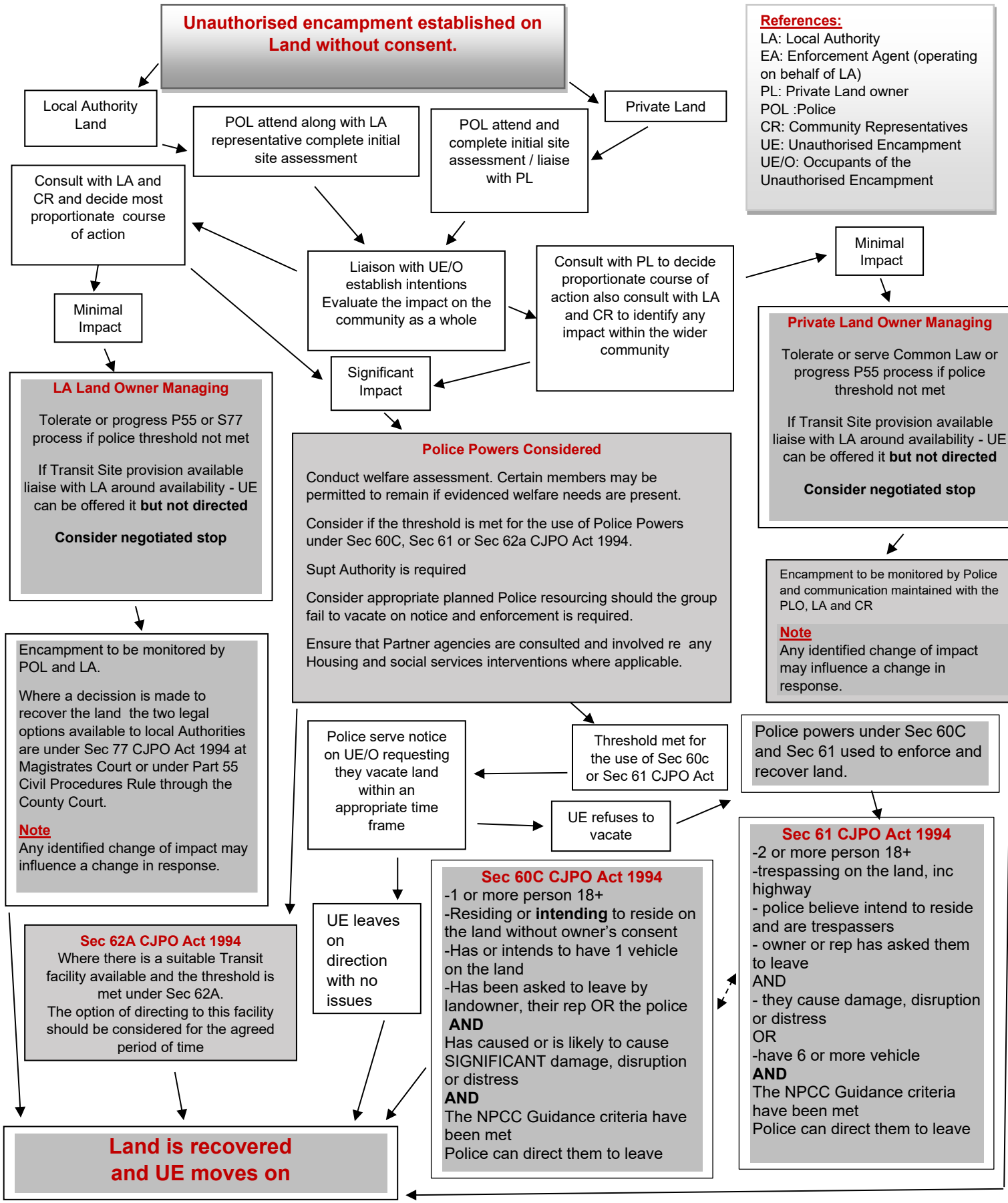
(g). Any allegations of criminal behaviour will be reported to the police

Appendix 5: Information Sharing Meeting Checklist

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

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

Appendix 6: Process Flow Charts.



IN THE HIGH COURT OF JUSTICE **Claim No: QB-2019-000616**
KING'S BENCH DIVISION

B E T W E E N :

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

Claimants

– and –

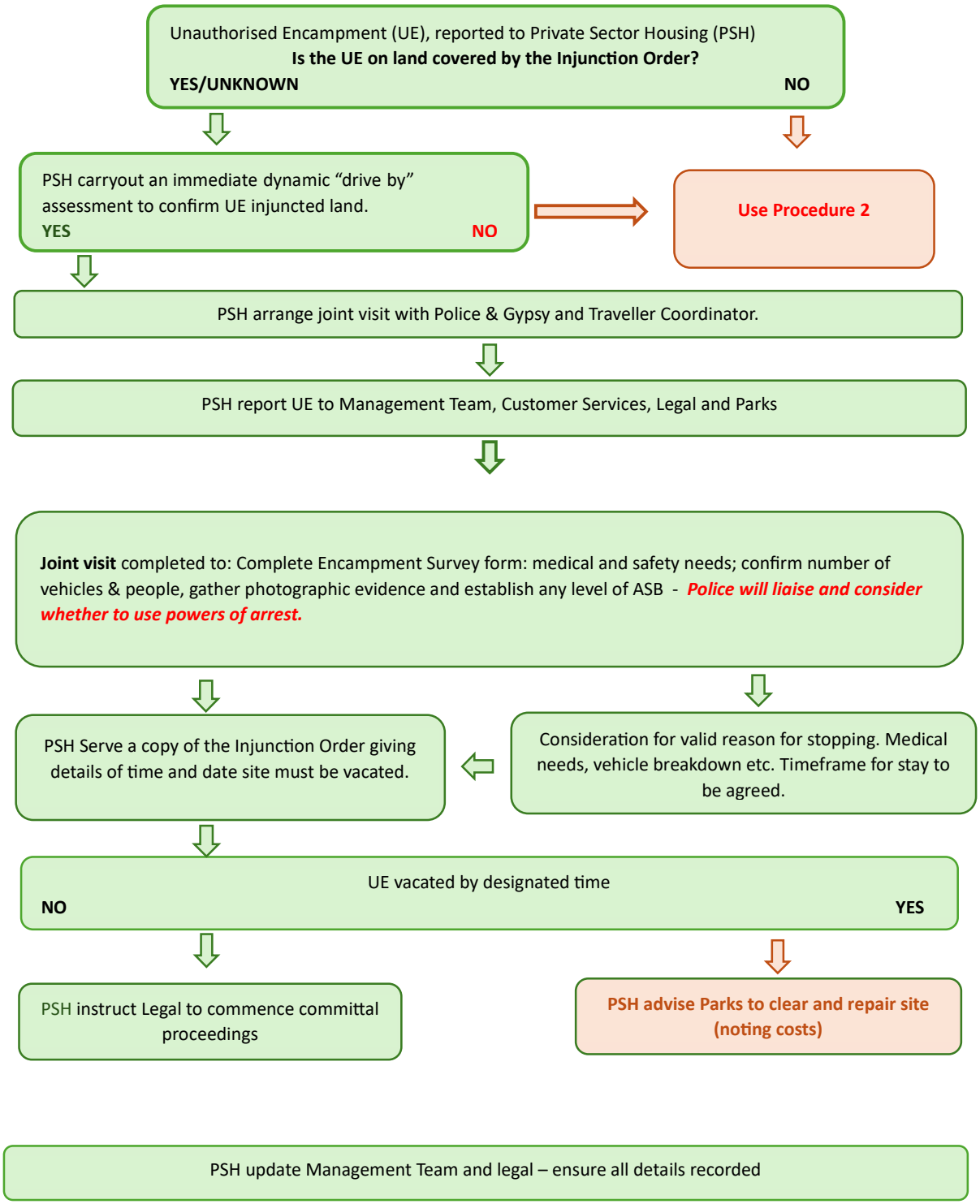
(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
(54) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE BOROUGH OF NUNEATON AND BEDWORTH

Defendants

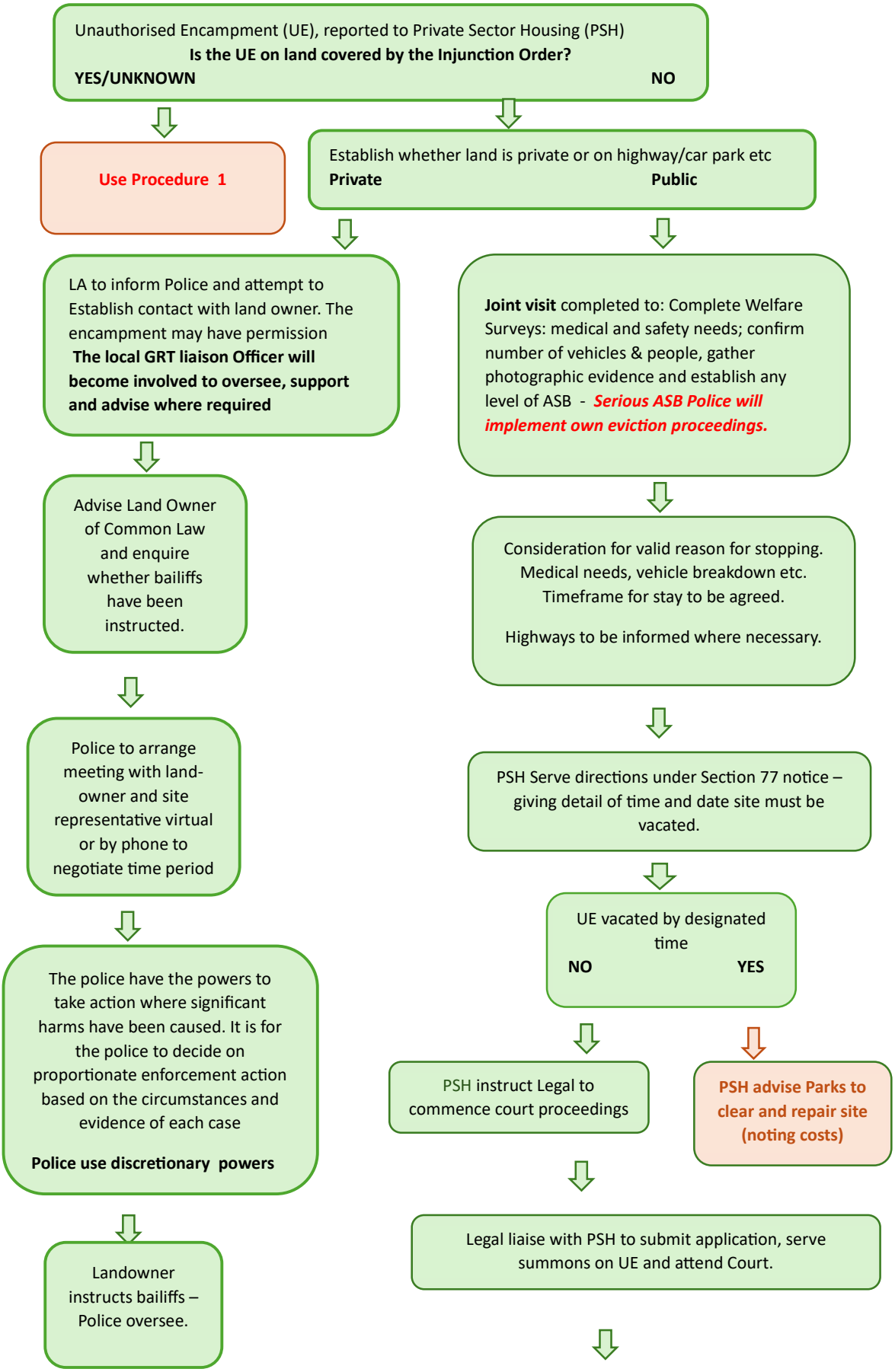
Exhibit 'AP2/5'

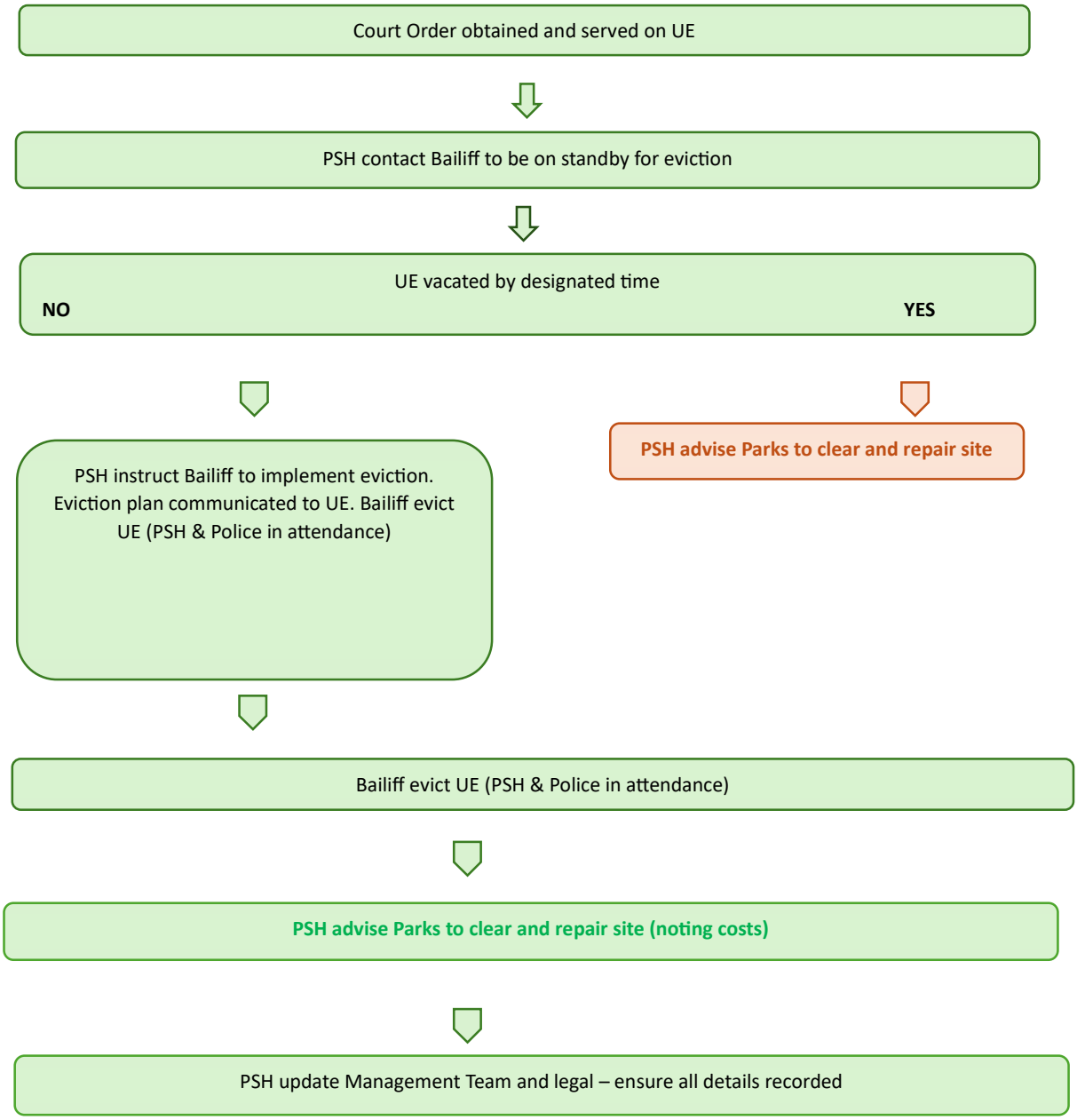
Unauthorised Encampments Procedure

Procedure 1 Unauthorised Encampments covered by Injunction Order



Procedure 2 Unauthorised encampment not covered by Injunction Order




Court Order obtained and served on UE
PSH contact Bailiff to be on standby for eviction
UE vacated by designated time
NO
YES
PSH instruct Bailiff to implement eviction. Eviction plan communicated to UE. Bailiff evict UE (PSH & Police in attendance)
PSH advise Parks to clear and repair site
Bailiff evict UE (PSH & Police in attendance)
PSH advise Parks to clear and repair site (noting costs)
PSH update Management Team and legal – ensure all details recorded

Nuneaton & Bedworth
United to Achieve

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

www.nuneatonandbedworth.gov.uk
024 7637 6376

ENCAMPMENT SURVEY FORM

LOCATION OF ENCAMPMENT:	
VISIT CARRIED OUT BY:	
DATE & TIME:	
FAMILY NAME :	
LAND OWNERSHIP (IF KNOWN):	
DATE ENCAMPMENT ESTABLISHED:	
REASON FOR VISIT PLEASE CIRCLE: **INITIAL VISIT** – Welfare questionnaire and initial letter. **ISSUING DIRECTION ORDER** – time and date (state that you also attached to land and if handed to person/put on caravan/left by caravan/ Injunction (if applicable).) **ISSUING COURT COMPLAINT-** time and date (state that you also attached to land and if handed to person/put on caravan/left by caravan) **ISSUING COURT ORDER-** time and date (state that you also attached to land and if handed to person/put on caravan/left by caravan) **RESPONDING TO A CALL** –give details	Notes

NO.OF CARAVANS/VRM'S/MODEL	
NO.OF VEHICLES ON SITE AT PRESENT/VRM'S/MODEL	
NO.OF ADULTS- MALES/FEMALES	
NO.OF CHILDREN + AGE RANGE	
PERIOD GROUP WISHES TO STAY	
KNOWN TO AUTHORITY IF YES PREVIOUS LOCATION	
ANY HEALTH ISSUES	
NO.OF ANIMALS PRESENT	
ARRANGEMENTS FOR RUBBISH /BLACK SACKS GIVEN	

ANY EVIDENCE OF DAMAGE TO PROPERTY	
REPORTS OF CRIMINAL OR ASB	
GENERAL CLEANLINESS OF THE SITE : – state any issues take photos of site to put into your statement	
ANY OTHER COMMENTS :	
SIGN AND DATE	

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

www.nuneatonandbedworth.gov.uk
024 7637 6376

Social Caring Information Checklist

Encampment/site location

……

Respondents name and mobile home identity

……

Officer Date

……

1) **When did you arrive on this land?**

……

2) **How did you get onto this land?**

……

3) **What permission do you have to be on this land and evidence of this?**

……

……

4) **Where did you come from prior to being on this land? Please provide details for the previous two encampments**

……

5) **How long were you on the previous land?**

……

Are any travellers receiving medical treatment from a local GP or hospital?

Yes **No**

a) **Name of GP or Consultant**

……..

b) **Any other medical information**

……

……..

Are you seeking support from Social Services? Yes No

What support are you seeking?

……..

Name of Social Worker-

Date

September 2026

Location Environmental Health Housing Procedures Encampments

Dealing with Unauthorised Encampments - HP18E

Procedure

Scope

This procedure outlines the powers available to local authorities to respond to unauthorised encampments, including directing persons to leave the land and, where appropriate, removing vehicles. It applies to encampments on both local authority-owned and privately owned land.

Legislation

Criminal Justice and Public Order Act 1994 (CJPOA), Part V
Police, Crime and Sentencing Courts Act 2022
Town and Country Planning Act 1990
Equality Act 2010
Caravan Sites and Control of Development Act 1960
Caravan Sites Act 1968
Planning and Compulsory Purchase Act 2004
Public Health Act 1936
Highways Act 1980

Responsibility of

The Local Authority upon whose land the encampment occurs:-
In Greater London a London Borough, or the Common Council of the City of London.
Elsewhere in England a County Council, District or Borough Council.
In Wales a County Council or County Borough Council.

Summary

This procedure applies where persons are residing in vehicles (including caravans) on land without consent, which constitutes trespass. An authority may take action using its statutory powers where appropriate, taking into account:

- Welfare considerations
- Equality duties
- Human rights obligations
- Impact on the local community.

The land may be publicly or privately owned. Responsibility for action may rest with the landowner, local authority, police or a combination of agencies.

General Procedures

1. A local authority may become aware of an unauthorised encampment on land, where such occupation is not considered lawful, by a number of means. Guidance on handling complaints is in the procedure ‘Investigation of Complaints and Service Requests’. An unauthorised encampment is when anyone camps (in moveable accommodation such as a van or trailer) without permission on land they do not own. This can be in vans, trailers, tents or other temporary structures.

2. The facts of the notification must be confirmed by completing a site visit and survey to establish the exact location and nature of the incursion, the ownership of the land and the nature and scale of occupation (see the section below

on initial site survey and assessment). Responsibility for dealing with an unauthorised encampment normally lies with the landowner. Landowners, the police and local authorities have a wide range of powers to deal with unauthorised encampments.

3. The authority must operate within a clearly documented policy framework, ensuring consistency and fairness in decision-making. The policy should ensure that all unauthorised encampments are dealt with in a consistent manner whether they relate to builders, Gypsies, Travellers or those on holiday. The policy should be based on the guidance provided in the Department of Environment, Transport and the Regions Circular 18/94, Gypsy Site Policy and Unauthorised Camping, as well as more recent guidance, such as 'Dealing with Illegal and Unauthorised Encampments' (DCLG – see Further Guidance below) and equality and human rights considerations.

4. It is essential that the policy recognises the rights of those who choose to live a nomadic way of life and in particular, the obligations under the Human Rights Act 1998 and the Race Relations (Amendment) Act 2000, now superseded by the Equality Act 2010 (including the Public Sector Equality Duty). A best-practice approach would be to adopt a joint policy and procedure with the local police authority.

5. The investigating officer must ensure all actions are:

- Lawful
- Proportionate
- Evidence-based
- Properly authorised.

Initial site survey and assessment
6. Where an unauthorised encampment occurs, the investigating officer shall establish and record:

- Occupants and vehicles present
- Duration and reason for occupation (if known)
- The exact location and extent of the land being occupied
- How the land is being accessed and, in particular, its relationship to land that adjoins it, e.g. residential area or sensitive buildings such as schools or medical facilities, including distances
- Environmental and safety considerations, such as whether there is any visible damage to the site and its boundary, and if the land was secure previously
- Whether the land is of special conservation interest or contaminated by material that could result in a risk to the health of the occupiers of the encampment
- Ground condition of encampment, e.g. concrete, grass, etc.
- Details of ground condition, e.g. any damage
- Whether the encampment encroaches upon, and/or obstructs any right of way or highway and consideration as to any danger relating to road safety.
- If the land has been occupied on any previous occasion, and if so, for how long
- The previous location of those involved with the encampment
- The likely impact on the local community, such as whether there is a significant adverse effect on the amenity of the local area, and if so, for what length of time could it be tolerated
- If there are any other sites, formal or informal, which could be more suitable
- The number and details of vehicles on the land, including number plates, the grouping pattern and distances between them
- Other vehicles on the land, i.e. cars, lorries, vans and mobile plant equipment, including number plates and distinctive identification marks, i.e. signage, telephone numbers, etc.
- Whether the vehicles appear to be roadworthy
- The details of the encampment population and any welfare needs (Sensitive personal data must be handled in accordance with data protection legislation and equality considerations.) Include details of:
    - Family names
    - Any children, including number, age and gender
    - Those in need of medical or welfare provision
    - Any member of the group who is pregnant
    - Group origin (e.g. Romany, Irish, etc.)
    - If any member considers themselves to be homeless
    - If any member of the group is registered to a permanent site
- Details of any livestock
- Details of waste disposal, toilet facilities, water supply, including consideration of statutory nuisance.

7. Following the initial site survey, the investigating officer will need to consider child support needs, i.e. education, potential child protection issues, etc. and the potential for impact on the environment and local community. A formal welfare assessment must be completed and recorded.

8. The officer should liaise with the appropriate service areas and partner organisations, such as:

- Education

- Children's and adults' social services
- Environmental health/environmental crime
- Waste management
- Highways
- Legal services
- Gypsy liaison officer
- Local councillors
- Police
- Anti-social behaviour agencies.

9. A full audit trail must be maintained. Throughout the process, the investigating officer shall keep an accurate record of the date and time of the initial survey and assessment, the details of all relevant discussions and the agencies and officers involved.

10. The local authority must decide which course of action it will follow, taking into account all existing policy and guidance. The authority may determine whether to tolerate the encampment temporarily or take enforcement action. This decision must be based on a documented proportionality assessment.

11. When determining whether to tolerate the encampment, the local authority must consider and balance the welfare needs of the encamped group in the first instance, followed by the characteristics of the encampment and the balance between the needs of the nomadic and settled population, in addition to rights under equality and human rights legislation.

Legislative powers and coordination
12. Where enforcement action is considered appropriate, the investigating officer shall determine which legislation is applicable to the case. The impact of the unauthorised encampment should be considered when deciding the most appropriate course of action. Possible courses of action include:

- Local authorities have powers provided by the **Criminal Justice and Public Order Act 1994, sections 77 and 78**, where persons are residing in vehicles (including caravans) (These empower the service of a direction notice under section 77 of the 1994 Act to vacate land and apply to land forming part of a highway, any other unoccupied land or occupied land without the consent of the occupier. An offence is committed where the conditions of the direction notice are not met. The local authority can apply to a magistrates' court for an order requiring the removal of the vehicles and unauthorised occupants from the land under section 78 of the 1994 Act. The local authority is responsible for enforcing the court order and should liaise with the police force to undertake eviction proceedings and prevent a breach of the peace.)
- Local authorities can use injunctions to protect vulnerable sites
- **Section 268 of the Public Health Act 1936** applies to a shed, van or similar structure and can be used when the condition is such as to be prejudicial to health
- Where the location is on their own land, the local authority may take an action against trespassusing **Part 55 of the Civil Procedure Rules** (The claim must be issued in a county court (or the High Court where there is a risk of public disturbance or harm) and may be secured relatively quickly against trespassers (minimum 5 days' notice for residential and 2 days' in the case of non-residential for a county court hearing). The power is also available to private landowners to take an action against trespassers on property or land. Local authorities may be required to advise private landowners about their rights to recover land from trespassers. Part 55 of the Civil Procedure Rules for an interim possession order gives an accelerated procedure for regaining possession of property occupied by trespassers. Trespassers who fail to leave within 24 hours of service of the court order are guilty of an offence under section 76 of the Criminal Justice and Public Order Act 1994.)

13. The investigating officer shall establish the ownership of the land being occupied. Where Travellers encamp on land they do not own, the issue will need to be resolved by other means, such as compliance with planning legislation or operating a caravan site without a site licence.

14. The investigating officer shall discuss each case with partner organisations, including the police, to establish roles and any joint or coordinated action. The police have powers parallel to those of a local authority, granted under section 61 of the Criminal Justice and Public Order Act 1994. This action can be effected more quickly than section 77, and the welfare considerations are less onerous. However, conditions must be met before an eviction can take place. The **Anti-social Behaviour Act 2003** provides additional enhanced eviction powers where suitable pitches are available on local sites that can accommodate the caravans.

15. The response to reports of an unauthorised encampment must be appropriate to the circumstances. In most cases, it should be the norm that a site meeting involving the local authority, police, and landowner be held at the earliest opportunity. This meeting should aim to clarify the issues relating to the occupation, the lead agency and the initial actions. The investigating officer shall ensure that the meeting takes place as appropriate, that the relevant local authority officers are invited, and that a record is kept of the meeting and its action points.

16. The investigating officer shall establish the needs of the people at the encampment and involve other local authority services such as education and social services, as appropriate. There is clear guidance for local authorities

on exercising section 77 powers, which require them to fulfil their other duties under education, children and homelessness legislation. Case law has clarified the courts' expectations for welfare enquiries and the decision-making process local authorities should follow when making evictions. They may also need to involve the health authority and other agencies, depending on the circumstances encountered.

17. Where land is in the ownership of a local authority, it is good practice to make those on the land aware that they are on the land without the permission of the local authority. A standard letter can be given to caravan occupants during the initial enquiries into their circumstances.

18. Incursions may range from a single caravan to many hundreds, and local protocols will need to reflect the anticipated actions of the agencies involved. Informal action and negotiation should form part of the eviction process. Records must be maintained for reference. Good communication is essential between the agencies involved, the Travellers and the community.

Nuisance policy
19. The standards of behaviour of those occupying the land should be the same as those expected from the settled community. Without prejudice to the specific duties and responsibilities placed upon a local authority, there will be a presumption that processes will be put in place to achieve the vacation of land subject to an unauthorised encampment in cases where such an encampment:

a) Creates an unacceptable nuisance to the public by reason of its size, location, nature or persistence. For example:

- Health: Where there is evidence of inadequate toilet facilities or accumulations of waste and rubbish
- Safety: Where the location of the encampment results in a hazard to the public
- Noise: Where occupants of neighbouring dwellings and/or buildings are disturbed by general noise, barking dogs or generators, particularly at night
- Animals: Where there are dogs that are not kept under control, especially where they intimidate persons or livestock.

b) Has an unacceptable impact upon the enjoyment, use or habitation of adjoining or nearby property, or interferes with the proper management of that property. For example:

- Damage to property or land
- Obstruction of commonly used rights of way
- Denying others the use of facilities, e.g. play area, sports fields, car parks, etc.
- Creating obstruction to road users and/or their safety
- Smoke from fires resulting in smell and nuisance to others
- Pollution of the land and/or watercourses by human, animal or chemical waste.

Use of section 77 power
20. If it appears to a local authority that persons are living in a vehicle or vehicles within that local authority's area, either:

- On land forming part of a highway
- On any other unoccupied land, or
- On any occupied land without the consent of the occupier

the local authority may give a direction that those persons and any others with them are to leave the land and remove the vehicle or vehicles and any other property they have with them on the land.

21. A direction must be served on the persons to whom it applies. It is legal to serve the direction by specifying the land to which it applies, addressed to all the occupants of the vehicles on the land without specifically naming them. (It is normal to give a copy to the occupant of a caravan, attach a copy of the direction to each caravan vacant at the time of serving the direction, and display copies on the site, specifically at all entrances to the site.)

22. An offence that renders a person liable to a summary conviction fine not exceeding Level 3 occurs if, following the serving of a direction:

- The person fails, as soon as practicable, to leave the land or remove identified vehicles
- The person, having removed such vehicles and property, re-enters the land within 3months of the date the direction was given.

23. A person affected by a direction has a defence if they can show that the failure to leave was the result of illness, a mechanical breakdown or other immediate emergency.

Section 78
24. The local authority may make a complaint to a magistrates' court if the requirements of a direction are not fulfilled. The magistrate may make an order requiring the removal of any vehicle or other property on the land and any person residing in it. An order may authorise the local authority to take such steps as are reasonable to carry out

the order and in particular, authorise entry onto the land.

25. The court may require the occupant of a specific vehicle or all occupants of vehicles on the land (without naming them) to attend when the complaint is being heard.

26. Unless reasonable enquiries do not reveal the details of the ownership/occupation of the land, the local authority must not enter upon the land to carry out the actions authorised by the magistrate unless they have given the owner and occupier at least 24 hours' notice.

27. A person who wilfully obstructs the local authority commits an offence and is liable upon summary conviction to a fine not exceeding Level 3.

Summary of other available powers
28. The importance of a multi-agency approach to dealing with unauthorised encampments has been highlighted above; and where applicable, other agency powers may be more suitable under the circumstances. The following paragraphs summarise other powers that may be considered in determining the best course of action and will rely on partnership working with the lead agency noted under each applicable statutory power.

Town and Country Planning Act 1990, sections 171E and 183
29. This legislation allows local planning authorities (LPAs) to issue temporary stop notices for up to 28 days where there is a breach of planning control in respect of any land. The Town and Country Planning (Temporary Stop Notice) (England) (Revocation) Regulations 2013 have enabled the use of this legislation against a caravan used as a main residence, where necessary and proportionate in the circumstances. Section 183 of the act allows local planning authorities to serve a stop notice relating to any activity that contravenes planning control guidance and is already subject to an enforcement notice under the same act. This quickly stops the activity, for example, to prevent further environmental damage or unauthorised building. Contravention of a temporary stop notice or a stop notice is a criminal offence, punishable on conviction by a fine. The penalty for non-compliance is a fine of up to £20,000 on summary conviction or an unlimited fine on indictment.

Caravan Sites and Control of Development Act 1960, Part 1
30. This act prohibits the use of land as a caravan site unless the occupier holds a licence issued by the local authority. Section 3 stipulates that a licence may be issued only if the applicant has permission granted under the Town and Country Planning Act 1990, ensuring there must be express permission in place for the operation of the site for such a purpose. A caravan site includes anywhere a caravan (including mobile or park home) is situated and occupied for human habitation, including touring and single sites. It does not however include where a caravan is used as additional accommodation for an existing dwelling, which is exempt.

Highways Act 1980
31. The act provides a range of powers available to the Highways Authority in dealing with unauthorised use, depositing of objects and the obstruction of highways under their control. Sections 1 and 263 give highways authorities the freehold title of a highway maintained at public expense under their control. This means that possession orders may be appropriate to require the removal of trespassers from property and land under their control. This would require using the procedures under Part 55 of the Civil Procedure Rules and must be issued in a county court with jurisdiction over the affected land. Section III of Part 55 enables an accelerated process through an interim possession order (IPO) to regain possession of property and land. If an IPO is granted by the court and served, the trespassers must leave within 24 hours of service of the order or otherwise be guilty of an offence under section 76 of the Criminal Justice and Public Order Act 1994.

32. Section 137 of the Highways Act 1980 makes it an offence for a person, without lawful authority or excuse, in any way wilfully to obstruct the free passage along a highway and may, by order, require the removal of the offending obstruction. Section 149 of the Highways Act 1980 stipulates that if anything is deposited on a highway and is causing a nuisance and/or danger, the highway authority may, by notice, require its removal, immediately in dangerous circumstances. The authority may make a complaint to a magistrates' court for a removal and disposal order under this section should the notice not be complied with.

The Criminal Justice and Public Order Act 1994, sections 61–62 (CJPOA)
33. This act allows the police authority discretion to direct trespassers to leave land and remove any property or vehicles they have with them in circumstances where they have otherwise refused to leave. The power applies where there are two or more people trespassing, the occupier has taken reasonable steps to ask them to leave and either: the trespassers have caused damage to the land; used threatening, abusive or insulting behaviour; or they have six or more vehicles on the land. Failure to respond to the direction order as soon as reasonably practicable is an offence.

34. Section 62 A–E CJPOA gives police additional powers, where there is a suitable pitch available on a caravan site elsewhere in the local authority area, to direct trespassers and Travellers to leave land and remove vehicles.

The Police, Crime, Sentencing and Courts Act 2022
35. The police have powers to deal with unauthorised encampments under CJPOA. The Police, Crime, Sentencing

and Courts Act 2022 strengthened powers and introduced new powers for the police.

36. This includes a new offence of residing on land without consent in or with a vehicle. Police will be able to exercise powers of arrest and seizure in relation to the offence, including seizure of a vehicle

37. The act strengthens powers to remove trespassers under section 61 with a common purpose of residing on land. Failure to leave the land as soon as possible without a reasonable excuse is an offence under the act. It is also an offence for a trespasser who left the land in compliance with the direction to leave to re-enter as a trespasser within 12 months of the direction.

The Human Rights Act 1998 and possession proceedings

38. The Human Rights Act 1998 should be considered when undertaking possession proceedings and it is advisable to seek legal advice regarding appropriate, reasonable and proportionate possession claims. The Human Rights Act 1998 (HRA) came into force in October 2000, incorporating the European Convention on Human Rights into British law. Challenges to possession claims have previously been made on the Convention right to a fair trial and public hearing within a reasonable time by an independent and impartial tribunal, and the Convention right to respect for private and family life, a person's home, and correspondence (Article 8). The European Court of Human Rights has established that Article 8 imposes a positive obligation on the United Kingdom to 'facilitate the Gypsy way of life' (*Chapman* v *UK* [2001] 33 EHRR 399). However, this must be balanced against proportionality and does not prohibit a local authority from taking steps to address unauthorised camping. The Supreme Court has further concluded the following (with reference to *Manchester City Council* v *Pinnock* (Secretary of State for Communities and Local Government intervening) (Nos 1 and 2) [2010] UKSC 45 par. 61–64) considerations for LAs in the determination of whether Article 8 may be applicable:

- It is only where a person's 'home' is under threat that Article 8 comes into play, and there may be cases where it is open to argument whether the premises involved are the defendant's home (e.g. where very short-term accommodation has been provided)
- Article 8 needs to be considered by the court only if it is raised in the proceedings by or on behalf of the residential occupier
- If an Article 8 point is raised, the court should initially consider it summarily, and if, as will no doubt often be the case, the court is satisfied that even if the facts relied on are made out, the point would not succeed, it should be dismissed (Only if the court is satisfied that it could affect the order that the court might make, should the point be further entertained.)
- If domestic law justifies an outright order for possession, the effect of the convention right may, albeit in exceptional cases, justify (in ascending order of effect) granting an extended period for possession, suspending the order for possession on the happening of an event, or even refusing an order altogether
- The conclusion that the court must have the ability to assess the Article 8 proportionality of making a possession order in respect of a person's home may require certain statutory and procedural provisions to be revisited
- The suggestions put forward on behalf of the Equality and Human Rights Commission, that proportionality is more likely to be a relevant issue 'in respect of occupants who are vulnerable as a result of mental illness, physical or learning disability, poor health or frailty', and that 'the issue may also require the local authority to explain why they are not securing alternative accommodation in such cases' are seen by the Supreme Court as 'well made'.

39. Recent government guidance (Dealing with Illegal and Unauthorised Encampments: A summary of available powers (DCLG, March 2015)) advises public bodies to consider rights and equalities protection afforded to unauthorised occupiers against the powers given to them to deal with unauthorised encampments. When deciding whether to take action, consideration may be given to:

- The harm that such developments can cause to local amenities and the local environment
- The potential interference with the peaceful enjoyment of neighbouring property
- The need to maintain public order and safety and protect health, for example, by deterring fly-tipping and criminal damage
- Any harm to good community relations, and
- The fact that the state may enforce laws to control the use of an individual's property where that is in accordance with the general public interest.

Local Procedures

A joint multi-agency protocol should be in place for managing unauthorised encampments and officers from all the signatory agencies should be trained to understand its contents and application.

Each incursion must be considered on its individual circumstances and all information, site surveys and decisions must be documented, preferably identified as incident specific, by all the agencies involved.

Enforcement

The Criminal Justice and Public Order Act 1994, sections 77 and 78

Power of Entry

The Criminal Justice and Public Order Act 1994, section 78

Further Guidance

See: Housing / National Policy and Guidance / Encampments
Circular 18/94/ WO Circular 76/94 Gypsy Site Policy and Unauthorised Camping, November (DoE, 1994)
Dealing with Illegal and Unauthorised Encampments: A summary of available powers (DCLG, March 2015)
Guidance on Managing Unauthorised Camping (ODPM)
Supplement to Managing Unauthorised Camping: A Good Practice Guide (ODPM)
Guide to Effective Use of Enforcement Powers – Part 2: Unauthorised Development of Caravan Sites (DCLG)
Guide to Effective Use of Enforcement Powers – Part 1: Unauthorised Encampments (ODPM)
Unauthorised Encampments: A summary of available powers (Home Office, June 2022)

Environmental Health / Housing / National Policy and Guidance / Caravan Sites
Gypsy and Traveller Accommodation Needs Assessments Guidance (CLG)

Planning / National Policy and Guidance / Policy
Planning Policy for Traveller Sites (DCLG, August 2015)

Enforcement / Procedures / Powers of Entry
Powers of Entry

Environmental Protection / Procedures / Noise / Power of Entry Noise
Entry by Warrant and Powers of Works in Default Including Seizure (Noise)

Related Procedures

See: Administration / Procedures / Complaints and Service Requests
Investigation of Complaints and Service Requests AP4

Enforcement / Procedures / Authorisation of Officers and Delegated Authority

Licensing / Procedures / Caravan and Tent Sites
Residential Mobile Home Site Licensing LP58

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Nuneaton & Bedworth
United to Achieve

IN THE HIGH COURT OF JUSTICE **Claim No: QB-2019-000616**
KING'S BENCH DIVISION

B E T W E E N :

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

Claimants

– and –

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

Defendants

Exhibit 'AP2/6'

January 2025 - September 2025

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

IN THE HIGH COURT OF JUSTICE **Claim No: QB-2019-000616**
KING'S BENCH DIVISION

B E T W E E N :

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

Claimants

– and –

(1) THOMAS CORCORAN
(2)-(53) OTHER NAMED DEFENDANTS
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Defendants

Exhibit 'AP2/7'

January 2026 to 26th of October 2026

Transaction type	Transaction number	Transaction Date	Period	Account	Account (T)	Costc	Subdeta	Tax code	Description	Amount
ID	1537111	17/04/2026	202702	4401	Oth:Gen,Hire & Cont.	DJ10	D000	OR	DWS 632 - Take down and replace injunction notices across the borough	1,991.18
ID	1538069	01/09/2026	202706	4401	Oth:Gen,Hire & Cont.	DJ10	D000	OR	DWS 889 Padlock replacements at various sites	228.27
ID	1538069	01/09/2026	202706	4401	Oth:Gen,Hire & Cont.	DJ10	D000	OR	DWS 892 Fly tipping at Portland Drive	954.32
										3,173.77

Official Purchase Order (NB064191)

As a Construction Industry Scheme (CIS) registered supplier, your order has been flagged as falling within the scope of the scheme. Please issue your invoice and supply a breakdown of the cost of materials and labour so that we can apply any deductions necessary to the appropriate amount. If the contract or works fall outside the scope of the scheme, your invoice will be reclassified appropriately.

Nuneaton & Bedworth
United to Achieve

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

D J Whitlock

Transmitted By email to djwhitlockplanthire@hotmail.co.uk

Order No	**NB064191**
Order Date	21/10/2026 10:06AM
Requested	Hayley O'Brien Grounds Maintenance, Parks & Cemeteries 024 7637 6137 (Phone) Hayley.O'Brien@nuneatonandbedworth.gov.uk

D J Whitlock Concrete block hire and moved September 2025 - January 2026 (DT)

Please supply the following goods or services

No	Item Code / Job	Product / Service Description	Unit Price	Qty	VAT	Total
[redacted]						

Official Purchase Order (NB064191)

As a Construction Industry Scheme (CIS) registered supplier, your order has been flagged as falling within the scope of the scheme. Please issue your invoice and supply a breakdown of the cost of materials and labour so that we can apply any deductions necessary to the appropriate amount. If the contract or works fall outside the scope of the scheme, your invoice will be reclassified appropriately.

		Each			
	CIS Labour **Yes**				
[redacted]					
[redacted]					
11	January 2026 hire	£735.00 / Each	1	£147.00	**£735.00**
	CIS Labour **No**				
				Total (excl.VAT)	**£4635.00**
				VAT	**£927.00**
				Total (incl.VAT)	**£5562.00**

Delivery Address: Town Hall / Hayley O'Brien

Ship to:

Town Hall
Coton Road
Nuneaton CV11 5AA
Warwickshire
UK

Mark For:

Name	Hayley O'Brien
Delivery Date	Not Applicable
Tel No	0247376137
Ship To Code	104974/001

Payment Method: To Be Invoiced - Central Creditors

Town Hall
Creditors and Procurement
Coton Road
Nuneaton
CV11 5AA

Payment Type	To Be Invoiced
Name on Invoice	Central Creditors
Cheque with Order	No

Important Instructions to Suppliers/Vendors:

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Terms and Conditions:

Standard Council Terms and Conditions apply unless replaced by Formal Contract Terms and Conditions agreed by both parties.

To view the Standard Council Terms and Conditions please go to https://www.nuneatonandbedworth.gov.uk/downloads/file/48/standard-terms-and-conditions

Official Purchase Order (NB064192)

As a Construction Industry Scheme (CIS) registered supplier, your order has been flagged as falling within the scope of the scheme. Please issue your invoice and supply a breakdown of the cost of materials and labour so that we can apply any deductions necessary to the appropriate amount. If the contract or works fall outside the scope of the scheme, your invoice will be reclassified appropriately.

Nuneaton & Bedworth
United to Achieve

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

D J Whitlock

Transmitted By email to djwhitlockplanthire@hotmail.co.uk

Order No	**NB064192**
Order Date	21/10/2026 10:07AM
Requested	Hayley O'Brien Grounds Maintenance, Parks & Cemeteries 024 7637 6137 (Phone) Hayley.O'Brien@nuneatonandbedworth.gov.uk

D J Whitlock - Block hire and moves February 2026 - June 2026 (DT)

Please supply the following goods or services

No	Item Code / Job	Product / Service Description	Unit Price	Qty	VAT	Total
1		February 2026 hire **CIS Labour** **No**	£735.00 / Each	1	£147.00	**£735.00**
2		March 2026 hire **CIS Labour** **No**	£735.00 / Each	1	£147.00	**£735.00**
3		April 30th 2026 blocks moved out of Heritage Centre **CIS Labour** **No**	£155.00 / Each	1	£31.00	**£155.00**
4		April 2026 hire **CIS Labour** **No**	£735.00 / Each	1	£147.00	**£735.00**
5		May 2nd 2026 blocks out and back in one visit for mobile toilet, Pauls Land **CIS Labour** **No**	£155.00 / Each	1	£31.00	**£155.00**
6		May 5th 2026 blocks back at Heritage Centre **CIS Labour** **Yes**	£155.00 / Each	1	£31.00	**£155.00**
7		May 2026 hire **CIS Labour** **No**	£735.00 / Each	1	£147.00	**£735.00**
8		June 2026 hire	£735.00 /	1	£147.00	**£735.00**

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Each

CIS Labour **No**

Total (excl.VAT)	**£4140.00**
VAT	**£828.00**
Total (incl.VAT)	**£4968.00**

Delivery Address: Town Hall / Hayley O'Brien

Ship to:

Town Hall
Coton Road
Nuneaton CV11 5AA
Warwickshire
UK

Mark For:

Name	Hayley O'Brien
Delivery Date	Not Applicable
Tel No	0247376137
Ship To Code	104974/001

Payment Method: To Be Invoiced - Central Creditors

Town Hall
Creditors and Procurement
Coton Road
Nuneaton
CV11 5AA

Payment Type	To Be Invoiced
Name on Invoice	Central Creditors
Cheque with Order	No

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