

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

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Claimant: LB of Havering
R HARPER
First
Exhibits: RH/1-RH/7
Date: 26.07.2019

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THE ATTACHED SCHEDULE

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF ROBERT HARPER

I Robert Harper, a Interim Enforcement Group Manager in the employment of the London Borough of Havering based at Mercury House, Romford WILL SAY AS FOLLOWS:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014, against the above named Defendants. The facts in this witness statement come from my own knowledge or, where they are not from my own knowledge, they are true to the best of my knowledge and belief. I have held my current position

for since September 2018 and took on the lead officer roll for this matter in January 2019. My current duties concern managing the enforcement action to be taken for environmental crime within the London Borough of Havering (**'the Council'**; **'the Borough'**). I have a good breadth of knowledge of relevant legislation and delegated authority to deal with such matter

2. The Council seeks an injunction on the following basis
 - a. the Council considers it expedient for the protection and/or promotion of the interests of the inhabitants or business within its administrative area; and/or
 - b. that it considers it expedient to seek an injunction to prevent further apprehended breaches of planning control; and /or
 - c. that the named defendants have engaged in or threatened to engage in or are likely to engage in anti-social behaviour and that it is necessary, proportionate, just and convenient to make an order against the said defendants.

3. The Council also seeks a power of arrest to be attached to the Order.

BACKGROUND TO CLAIM

4. The Borough was first mentioned in the Domesday book. It is located to the North East corner of the metropolis of Greater London. It is bordered by Thurrock Council to the east, the River Thames to the south, and the London Boroughs of Barking and Dagenham and Redbridge to the west. To the north by Epping D.C and Brentwood Borough Council. Havering is the third largest London Borough being 115 Sq Kilometres (44 Square Miles) in area. In 2016 it had a resident population of 252,783 persons and 9,220 businesses. In 2011 there were 97,199 households, but this is now believed to be over 100,000 households. In relation to the ethnic makeup of the borough 197,615 persons (83.3%) have defined themselves as white British, 2,989 (1.3%) as white Irish, 160(0.1%) as Gypsy and 7185 (3%) as other white. 36.8% of the resident population

are aged 50 years and over and 94.4% have English as their first language.

5. The borough has twenty main leisure parks and forty-two defined leisure open spaces among a number of other maintained open spaces and highway verges. These green spaces house a third of London's reed beds and hedgerows, as well as about a fifth of London's ponds and lakes. It supports a wide range of flora and fauna including protected species such as stag beetles, crested newts, as well as butterflies, moths, song birds and the plants which they need to survive. According to the Authority Monitoring Report 2016-17 (which I produce and am shown as **Exhibit RH1**) Within Greater London, Havering has 56% of the grazing marsh, 31% of the reedbed, 31% of the floodplain grassland, 25% of the marshland and 19% of the lakes and ponds for all London boroughs.

6. Havering has retained its three Sites of Special Scientific Interest (SSSI's) – located within;
 - a. Hornchurch Cutting;
 - b. Ingrebourne Marshes; and
 - c. Inner Thames Marshes

7. These have not changed since 2009/10 and are unlikely to change year-on-year given their significant status. In 2011, Greenspace Information for Greater London (GIGL) recorded the condition of these sites as:
 - a. Hornchurch Cutting: a 0.7 ha site in unfavourable but recovering condition. Hornchurch Cutting, which lies along the railway line, is also identified in the Mayor's London's Foundations SPG (2012) as a site of geodiversity value.
 - b. Ingrebourne Marshes: a 65 ha site, 39 ha of which is in favourable condition, 3 in unfavourable condition and 23 ha in unfavourable and declining condition.

- c. Inner Thames Marshes: a 357 ha site, 106 ha of which is in favourable condition, 152 in unfavourable and declining condition , 86 in unfavourable but recovering condition and 13 ha that have been destroyed.

- 8. Such data shows that the condition of Havering's SSSI's is only classed as favourable for just over 145 ha of the 424 ha total SSSI land- 34%. Of the remainder, 21% is in recovery, 42% is in unfavourable condition and declining further, and 3% has been destroyed. Our SSSI's therefore clearly require attention to improve their overall condition and sustainability for the enjoyment of future generations.

- 9. Furthermore, in light of Local Plan works, a review of Havering's Sites of Nature Conservation has identified a number of additional sites for inclusion at the Borough level, namely;
 - a. Gerpins Lane Open Space: Semi-improved neutral grassland, tall herb, scrub, broadleaved woodland (planted in the 1980s), scattered trees, hedges
 - b. Folkes Lane Woodland: Mixed woodland (planted in 2002), mature trees (possibly ancient), semi-improved neutral grassland, scrub
 - c. Tylers Wood: Broad-leaved woodland (planted in 2002), hedges, semi-improved neutral grassland, scrub
 - d. Harold Court Woods: Broad-leaved woodland (mostly planted in 2001–3), hedges, semi-improved neutral grassland, ponds
 - e. Pages Wood: Broad-leaved woodland (planted in 2002), hedges, semi-improved neutral grassland
 - f. Berwick Glades: Broad-leaved woodland (planted in 2003), hedges, semi-improved neutral grassland

- 10. The review also identified North Ockendon Pit, a neutral grassland (semi-improved) home to tall herb, scrub, woodland, scattered trees and

standing water for promotion in status, from Borough to Metropolitan level.

11. The Council is embarking on an ambitious regeneration and development programme which is set to deliver 5000 new homes, including 1800 affordable homes in the next 10 to 15 years. Developments will be delivered through the Council's three 50/50 Joint Venture Vehicles with private sector development partners and its wholly-owned development company, Mercury Land Holdings. Collectively, the three Joint Vehicles and Mercury Land Holdings are anticipated to require the Council to invest up to £96.24m with the potential to generate over £56.7m in profits and land receipts to the Council between 2017/18 and 2025/26. In conjunction with the new developments, residents will benefit from new schools and health facilities, and travel and infrastructure upgrades. The developments have the potential to provide massive economic boosts for the local economy. It is estimated that for each unit of housing completed, 4.4 new jobs are created which means that overall the developments could deliver up to around 22,000 new jobs. Increasing the housing supply in the Borough will reduce housing demand pressure on the Local Authority and its spending on homelessness reduction solutions. The proposals could generate over £20 million in s106 and CIL contributions to invest in local infrastructure. The increase in housing supply will generate additional Council Tax revenue for the Local Authority as well as Stamp Duty tax receipts for HM Treasury.

12. The London Borough of Havering is currently undertaking an updated to its GTAA. I am advised that as at the base date for the GTAA there were zero public sites for caravans, 6 private sites with permanent planning permission, which consists of 21 pitches. A total of 6 of these pitches are subject to the completion of a s.106 agreement. There are 3 private sites with temporary planning permission, consisting of 7 pitches. There are 2 sites which are tolerated sites for planning purposes, consisting of 5 pitches. There are currently 31 unauthorised sites consisting of 102

pitches. There is 1 travelling showperson yard which consists of 5 plots. There are no public transit sites. These figures include three sites, namely Haunted House Wood, Laburnham Stables, and Railways Sidings), which have a mixture of pitches with permanent planning permission, temporary permission, or unauthorised pitches.

Figure 5 – Total amount of provision in Havering (December 2018)

Category	Sites/Yards	Pitches/Plots
Public sites (Council or Registered Providers)	0	0
Private sites with permanent planning permission	6	21
Private sites with temporary planning permission	3	7
Tolerated sites	2	5
Unauthorised sites	31	102
Public transit provision	0	0
Private transit provision	0	0
Travelling Showpeople yards	1	5
TOTAL	43	140

Appendix D: Sites and Yards in Havering (December 2018)

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots
Public sites		
None	-	-
Private sites with permanent planning permission		
Haunted House Wood	3	-
Laburnham Stables	1	-
Railway Sidings	2	-
The Old Forge	1	-
The View, Prospect Road	3	-
Willow Tree Lodge ^[2]	11	-
Private sites with temporary planning permission		
Laburnham Stables	2	-
Railway Sidings	3	-
Tyas Farm Stud	2	-
Tolerated sites (without planning permission)		
Crow Lane (r/o 21)	-	1
Crow Lane (r/o 24)	-	4
Unauthorised sites (without planning permission)		
Lower Bedfords Road	-	3
Ashleigh View, Tomkyns Lane	-	5
Blossom Hill View, Church Road	-	1
Cherry Blossom View, Church Road	-	1
Cherry Tree View, Church Road	-	1
Dunromin, Church Road	-	1
Fairhill Rise	-	4

^[2] A total of 6 of these pitches are the subject of a Legal Agreement that had not been concluded at the time of this report.

Gravel Pit Coppice	-	6
Haunted House Wood	-	5
Hogbar Farm	-	11
Hogbar Farm East	-	8
Hogbar Farm West	-	7
Laburnham Stables	-	1
Land east of Rosewood Cottage	-	1
Land west of Benskins Lane	-	6
Meadow Rise, Church Road	-	4
Meadow View, Church Road	-	3
Paddock View, Church Road	-	2
Plot 3, Church Road	-	1
Plot 13, Church Road	-	1
Plot 14, Church Road	-	1
Springfield, Church Road	-	2
The Caravan Park, Putwell Bridge	-	4
The Grove, Prospect Road ^[3]	-	5
The Oak View, Church Road	-	1
The Oak, Church Road	-	1
The Schoolhouse, Church Road	-	1
Vinegar Hill	-	9
White House, Benskins Lane	-	4
Willoughby Drive (Adj No 1)	-	1
Willow View, Church Road	-	1
TOTAL PITCHES	28	107
Travelling showpeople yards		
Fairoaks	5	-
TOTAL PLOTS	5	0
Public transit provision		
None	-	-

[3] This site was granted temporary planning permission for 18 months after the base date for the GTAA, this has now lapsed, and the site is unauthorised

13. The 'unauthorised encampments' referred to above are in the category of 'settled' encampments. They are currently awaiting to be allocated within the new Local Plan which, if they are, will render them 'authorised' for these purposes. They are not of the type of encampment which the Claimant seeks to prevent by way of injunction and it is not anticipated that these numbers will be impacted by the injunction.

14. There is now produced and shown to me marked **Exhibit RH/2** a map of the Borough demonstrating the locations of each of the unauthorised encampments over the last 3 years. A schedule **Exhibited at RH/3** lists the date location of each encampment and reveals the following in relation to the split between the private and public sites over the last 3 years. I also produce and am show **Exhibit RH/4** which is a map of the sites the Claimant seeks to protect by way of injunction. I also produce and am shown **Exhibit RH/5** a schedule of those sites.

15. The Claimant currently manages the unauthorised encampments within its Borough in the following way:
 - a) Where the criteria under the ACPO Police guidance is satisfied the Police may be asked to use powers under section 61 Criminal Justice and Public Order Act 1994.
 - b) The Council may exercise its powers under section 77 and 78 Criminal Justice and Public Order Act 1994.
 - c) We offer a 'welfare sheet' containing information on local hospital location and a code of conduct etc
 - d) On some Parks and Open Spaces the local by-laws deny any right to camp and removal of any encampment is undertaken in accordance with these by-laws.

- e) On private land it is the owner's responsibility to seek civil redress with the use of bailiffs, and the Council will provide advice to the owner of the land on how to arrange removal of the encampment.
- f) A Negotiated Tolerance Procedure and Temporary Transit Agreement has been developed which I **exhibit as RH/7**.

16. Where the Council is considering using its powers pursuant to section 77 CJPOA, Council Planning / Enforcement officers and/or Parks Police will first attend the scene to ascertain if there has been an unlawful encampment, check ownership of the site or land if appropriate through land registry search or direct contact with tenants/owners etc. Officers will check if any damage has been caused at the site/land or property either on entry or during the relevant time of unauthorised occupation. The relevant officer will make a note of the number of people and vehicles (such as caravans) on the encampment. Officers will engage with trespassers and any other persons present to enquire of their planned duration of the stay, and welfare assessments will be undertaken of the trespassers, particularly if any require medical attention such as pregnant women and young children or if any require assistance with housing needs. If appropriate the relevant Officer will contact the Metropolitan Police if the Officer considers there are aggravating circumstances for the police to undertake an assessment to serve a Notice under Section 61 of CJPOA.

17. The Borough uses a Microsoft CRM database on which many incidents are recorded, although information can also be received via email and phone messages. Most records are held on Excel spreadsheets. I have no reason to suspect that any data has been incorrectly recorded.

18. The number of encampments, however, demonstrate that existing powers have not abated their occurrence, with the un-authorised encampment simply moving from the site which they are required to leave, and then setting-up camp at another site within the Borough, sometimes only moving a few hundred metres. The issue does not appear to be an issue

of residential need, and it seems that for many of the encampments the motivation behind encampments is commercial gain, with the travellers breaking into business premises and accessing green spaces and fly-tipping on a commercial scale, leaving the owner of the land with tens of thousands of pounds in waste disposal costs and clean-up costs. The Council will also be left with thousands of pounds in eviction costs and clean-up costs for public land.

Identity of Defendants

19. The Local Authority experience difficulty in obtaining accurate identity information of the defendants when an encampment is undertaken. Welfare Checklists are undertaken in accordance with the Claimant's legal obligation, but there is no legal power to compel the disclosure of a particular person's identity. Either no name will be given, or a common name will be given, or potentially a false name. Attempts to photograph can be met with hostility, placing officers of the authority at an unacceptable risk.

20. The Claimant has recorded vehicle registration marks ('VRM') for the majority of unauthorised encampments. These VRMS have also been recorded by the Police. The VRMs are set out in the statements provided by the Police and Local Authority officers. The Claimant has identified the named defendants in these proceedings either
 - a. Following disclosure by the Police as a result of PCN checks; or
 - b. Following requests to the DVLA

21. Such checks and requests have been made in respect of each VRM recorded and made known to the Claimant.
22. These two methods have identified both the registered keeper and any named drivers for the vehicles that have positively been identified as having been part of unauthorised encampments in the past. Some vehicles have clearly been stolen, or the plates have been cloned, and the Claimant has 'filtered' out obvious cases of these (for example, vehicles registered to a national chain of shops who provide baked goods and pastry) so that it is left only with individuals. Clear patterns emerge of specific family groups who partake in these encampments, e.g. Ward, Stokes, McDonagh. In our submission can be found on the balance of probabilities that the registered keepers and/or named drivers of these vehicles are the individuals who are partaking in the unauthorised encampment, or that the vehicle has been used in the encampment with their authority and that those occupying are associated with the registered keepers and/or named drivers.
23. The DVLA do not return data for all VRMs that have been submitted.
24. The Claimant therefore has engaged in robust measures to identify the defendants, and can be expected to do no more. It is unable to ascertain the identity of additional defendants in the time available to it, or at all. The means of description in the claim form is the best that the applicant is able to provide given the extensive evidence gathered to date.
25. It is uncontentionous to state that there will be individuals who form unauthorised encampments who are not the registered keepers or drivers of the vehicles that also form the encampment, and who cannot be identified at the scene. It is on this basis that the Claimant considers it both reasonable and proportionate to include as a defendant Persons Unknown of the description in the Claim Form, and considers that the majority of persons who do form unauthorised encampments within its borough will be the unidentified persons unknown.

26. The unlawful encampments experienced in London Borough of Havering over the last 3 years have had a number of impacts on the Borough and its inhabitants. This can be broken down into the following types of nuisance and harm, which I address in more detail later in this statement:

- a. Fly-tipping;
- b. Risk to public health;
- c. Damage to the wealth and prosperity of the Borough;
- d. Environmental Impacts on green space and damage to land
- e. Threats and intimidation;
- f. Impact on Highways
- g. Impact on schools;
- h. Community Tension and Crime
- i. Financial Costs

FLY-TIPPING

27. Many of the sites, where there have been unauthorised encampments, have been fly-tipped on a commercial scale, and it is usually the most immediately obvious impact of these sites. The usual disposal costs of normal commercial waste sent to landfill generates a landfill tax of £145 per tonne, which is the amount the fly tippers would have to pay if they were to dispose of commercial waste lawfully. If the waste is contaminated by hazardous materials such as asbestos, that cost escalates. Accordingly, the travellers offering waste disposal services to the public and business owners, make a significant commercial saving if they fly-tip the waste either on the Claimant's land or privately owned land. Once fly-tipped on land, the landfill tax costs become the

responsibility of the landowner, who will be obliged to pay these costs to lawfully dispose of the waste. This has at times meant that innocent land owners and the Council have incurred costs of up to £100,000 in cleaning and disposing of the waste left behind by the travellers on a site, purely on the basis that as owners of the site they are responsible for the waste once it is tipped on the site (see for example, the witness statement of Sebastien Hung).

28. I refer to the following witness statements which detail the impact of fly tipping associated with unlawful encampments:

a. **Amy Morgan** in her witness statement outlines an ongoing investigation by the Environment Agency into the commercial scale criminal fly tipping operations in East London (and wider), currently practiced by a number of defendants named in this claim. The statement of Amy Morgan details typically the type of behaviour which the Claimant seeks to prevent, behaviour which in no way involves any form of genuine need, but demonstrates professional criminal activity with the use of caravans and associated vehicles to facilitate significant commercial gain.

i. The investigation involves 77 suspects who are named, however *“a large number of these will be alias’ and the true identity and number is not known”* (**paragraph 4**).

ii. Clear up costs can exceed £250,000 (**paragraph 6**)

iii. The group first operated in Havering in 2016, focusing on Enfield in 2017, and returning back to Havering in 2018 (**paragraph 6**).

iv. The *modus operandi* involves: accessing the site by cutting locks, caravans are moved onto the site to take up residence, children are deployed to control gate access, s144 LASPO notices placed on the sites, waste is imported and deposited onto the site, which will continue until either

the site is full or a court order is obtained, and the police will normally view this as a civil rather than criminal matter reducing the effectiveness of response (**paragraph 7**).

- b. **Andrew Gouldstone, Paragraph 4.** Andrew Gouldstone is the Senior Site Manager for the RSPB site at Rainham Marshes. In his witness statement Mr Gouldstone provides evidence that the travellers entered the site in November 2016 and fly-tipped the site for 5 days, leaving the charity to clear 16 lorry loads of fly-tipped waste including clothes, shoes, household and building waste. The travellers also left a large skip of building waste on the site which the charity was required to remove. Rainham Marshes is a Site of Special Scientific Interest (SSSI) and obviously fly-tipping of this scale would have an adverse impact on the site. This cost the charity, £2,450 in bailiff costs. The Claimant arranged for removal of the waste.
- c. **A resident, who is known to me but who is anonymised,** confirms the fly-tipped waste on the green open space on Wincanton Road Green. He describes the following on 22 May 2017 *“The green is in a horrendous state and full of human faeces, horse poo, bloody towels, household waste, metal cages, bricks etc...”* and at paragraph 16 that *“the smell...is somewhat putrid and the longer it festers the quicker it will become a major health hazard”*. He confirms that the travellers that have repeatedly set-up encampment on Wincanton Road Green, are *“engaged in waste collection and fly-tipping. Fly-tipping avoids the charges which are in place for proper disposal of commercial waste”*
- d. **Deborah Ferry,** the Area Supervisor for ‘Public Realm’ produces a witness statement highlighting the level of fly-tipping which have been found on the sites she has attended after the unauthorised encampment has left the site. She summarises as **paragraph 4** that from 2016 to date the Council has cleared some 685.5 tons of fly tipped material, costing £162,467 to remove.

- e. **Sebstain Hung, Paragraph 10**, of Regency Homes Limited, who at **paragraph 11** provides evidence of fly-tipping by travellers on a construction site managed by Regency Homes Limited, on Angel Way, Romford. He explains how the travellers forced their way onto the site and threatened the security guard with violence. The travellers then locked themselves inside the site, using their own padlock and the travellers were seen, by the security team, bringing waste onto the land and fly-tipping the land, and once the travellers ran out of space on the site to dump rubbish, they started to dump the rubbish on the road outside the site gates. The travellers were photographed entering the site and tipping waste, covering the number plates to their vehicles. Photographs of these activities are exhibited by Mr Hung.
- f. **Mr Tajinder Singh Dhir**, who is employed by Mascraft Limit and responsible for the management of the Palms Hotel in Havering, exhibits (at **paragraph 2, Exhibit TD1 and TD2**) photographs demonstrating fly tipping experienced at the Palms Hotel. He describes, at **paragraph 2**, that the fly tipping occurred after travellers forced entry and deposited tyres, construction waste, domestic household furniture including white goods, asbestos, plus human and household waste. This impacted heavily on a plan to re-open in 2 months time. At **paragraph 14** he confirms that the company has had to employ protective measures such as installation of bunds, trenches, concrete blocks, palisade fencing and concrete bollards and that a substantial amount of waste remains following an incursion in September 2018.
- g. **Trevor Massie**, an Estates Manager for GLA Land and Property Limited, confirms that since 2014 there have been 9 unauthorised encampments on the three sites managed by his company that are located within the Claimant's borough. He states at paragraph 7 "*...when an unauthorised encampment occurs, the travellers gain access followed quickly by various types of vehicles attending*

site and depositing a variety of waste material including tyres, construction materials and waste, domestic household furniture including white goods, asbestos containing material and food waste. In doing so, the owner of the waste or the driver of the vehicle dumping the material is avoiding the payment of transport costs to disposal facilities, landfill tax and disposal costs. As GLA sites are large in one case over 2 hectares it has been difficult to regain access to site whilst the travellers are on site to gather evidence to record these occurrences. It is only when the travellers have left site that the full extent of the fly-tipping of waste can be seen. Photographic evidence has been provided to show the type and amount of waste left after incursions. . Then at paragraph 9 he confirms “The cost to GLAP, who are London tax payers, to evict travellers, clean up the dumped waste and to install more robust defensive measures is substantial. The total cost to remove fly tipped material left by travellers over three years has been £151,277 Over the same period GLAP has also expended over £71,180 in additional physical security measures to minimise further unlawful incursions. A further £34,190 of costs has also been incurred for legal fees and bailiff costs.”

- h. **Iker Dervish**, the Chairman of the London Riverside (BID) Limited, a business improvement district not-for profit company, has provided a witness statement explaining the difficulties experienced by businesses it works with. He refers at paragraph 7 of his witness statement to a travellers’ encampment that occurred on land at Consul Avenue, and states: “I can confirm that recently the incident I have just described happened a Consul Avenue, which is an area of land owned and controlled by one of our members, travellers committed criminal damage to gain entry to the site, up to twenty plus caravans and associated vehicles stayed on the site for several days before they were forcibly evicted. The site was heavily fly-tipped costing approximately £80,000 to clear.”

- i. **James Sutton**, the Mineral and Waste Planner for Ingrebourne Valley Ltd confirms, at **paragraph 10** of his statement, that fly tipping cost the sum of £32,131.97 following encampments in 2014.
 - j. **Kevin Sullivan**, of Havering College, details an encampment from April 2016 and, at paragraph 5 “*The total cost of clearing the rubbish from the college land was £25,788.00 inclusive of VAT and the legal fees for obtaining the Possession Order amounted to £5,287.60.*”
29. I am aware that officers conducted DVLA checks of all vehicle registrations that have been recorded as being used to fly-tip sites that are referred to in the Claimant’s evidence. Where it has been possible to identify the registered owner of the vehicle this is also recorded.

RISK TO PUBLIC HEALTH (INCL. HUMAN EXCREMENT)

30. Human excreta, the collective name for human faeces and urine, contain many disease causing pathogens (viruses, bacteria, cysts protozoa and eggs of parasitic worms). One negative impact of human waste is the risk of surface water contamination which is caused by liquid and solid waste products that find their way into water bodies. Once out of the body stools are subject to environmental bacteria that may use the excrement as food, and thrive. When dry stools become lighter and more susceptible to becoming airborne, this creates a potential to travel greater distances and affect more people. Disease causing organisms that live in the human gut are easily spread from person to person when they are excreted in the faeces. Diseases that are recognised as being spread in this way include viral and bacterial gastroenteritis, hepatitis, cholera, dysentery and intestinal worm infections. Contact with faeces can cause skin irritation and infections, especially when there are minor cuts or abrasions, such infections having the potential to lead to septicaemia and death. I refer to

the witness statement of **Martin Grant**, Environmental Health Officer, who deals with the public health implications.

31. Health hazards are identified by the following witnesses

- a. **Sebastien Hung** at paragraph 11 and 12 confirms that *“significant levels of waste dumped were a potential fire hazard and had fires been set the smoke may have been sufficient for the highways authority to close St Edwards way...they were defecating and urinating on the site. This human waste quickly caused a smell which pervaded the area. This and the fly tipped waste posed a major health hazard to those who wanted to use the site lawfully”*.
- b. **Mike Turrell** confirms in his statement at paragraph 3 that after an encampment at the St George’s Hospital site there was *“significant amounts of rubbish including human excrement”*.
- c. **Robert Gleed** details the health and safety risk posed by discarded gas cylinders: *“All cylinders, regardless of their contents, are at greatest a risk of failure when subjected to direct flame impingement. As a cylinder is heated the steel or aluminium shell loses its tensile strength (300oC for steel, 200 – 250oC for aluminium). All cylinders ultimately fail because the shell reaches a point where its tensile strength weakens and can no longer contain the increasing internal pressure. Any steel cylinder that fails has the potential to project fragments up to 200m. Therefore, if it is at risk of failure (i.e. it has been substantially heated, or is being subjected to direct flame impingement) an initial Hazard Zone (HZ) of 200m must be implemented around any cylinder. However, full consideration should be given to the availability of substantial cover and how this may allow the initial HZ to be reduced. When a cylinder fails this causes the contents to escape and may ignite causing a fireball of up to 25m in diameter and throw debris up to a distance of 200m. Acetylene cylinders are designed to fail in ductile mode and split along their entire length.*

However, if a partial split occurs the cylinder itself can be propelled up to 200m.”

- d. **Simon Treacy** , Estates Manager of Tarmac Trading, who are the freeholder of Berwick Woods, a 72 Acre Public Park, consisting of car park, public footpaths, nature trails, woodland and grassland areas. On 20th April 2018 (**paragraph 6**) there was “*extensive fly tipping... consisting of mixed demolition and house clearance waste that had been tipped on grassland areas and footpaths alongside on of the sites woodland blocks. Quantities of broken class and other waste had been s[read across the sites public car park*”

DAMAGE TO WEALTH AND PROSPERITY IN THE BOROUGH

32. A number of encampments which occur do so on development or investment land. Stakeholders have provided witness statements in support of this claim to demonstrate the impact that these incursions have on developments and investments in the borough:

- a. **Ilker Dervish** is the chair of the London Riverside BID, which is a ‘business improvement district’. These are not for profit organisations approved under the Business Improvement Districts (England) Regulations 2004. They are geographical areas in which local business have voted to invest together to improve their environment. These areas are strongly endorsed by the Mayor and City Hall, and their role in ‘place shaping’ of local town centres and industrial estates. Mr Dervish confirms (Paragraph 3) that the BID encourages and improves regeneration and improves the area. The aim is to promote and attract inward investment in the area and that there is a clean, green and secure agenda supported by the Mayor of London. He refers to the following, namely, that groups are “*systematically identifying sites within the BID area and carrying out large scale fly tipping causing a detrimental effect on the local amenity*” (**at paragraph 4**) and,

secondly, “a significant increase in unauthorised traveller encampments on the land owned and controlled by members of the BID...[where] on many occasions [the travellers] have entered the land by force or criminally damaging the entrance gates or perimeter fences to gain access. Occasionally security guards have been threatened and assaulted in the process” (**paragraph 5**). He confirms an £80,000 cost to clear a site (**paragraph 7**) and a necessity for stakeholders to increase their security budget by 50% (**paragraph 9**). This has all resulted in a reluctance to invest in business, new or existing, within the area and a consequent loss of employment opportunities (**paragraph 10**).

- b. **Trevor Massie** is responsible for GLA Land and Property Limited, the May of London’s property company, which has substantial land holdings within LBH. The sites identified by Mr Massie at paragraph 4 have been designated for housing and commercial purposes, to bring employment opportunities to the Borough and provide supplier contracts for local businesses. At paragraph 9 he confirms “*In addition the result of the unauthorised access and dumping of waste material has a detrimental effect on local residents and businesses making it more difficult for organisations such as Londoneast-uk to attract new businesses to the area restricting the generation of additional business rates for the local authority and economic growth to the area.*”
- c. **Sebastien Hung** gives evidence in relation to the impact of unauthorised encampments on the site owned by regency homes. He confirms, at paragraph 4, that the site in question (Angel Way, Romford) is currently land under development “*of much needed housing within the Borough of Havering*”. On 10th July 2016 the site experienced an incursion in which “*the padlock had been cut off and one of the security guards was confronted by the travellers entering the site with caravans, vans and cars*” (paragraph 5). The

incursion on the site therefore impacted on the development of much needed housing land within the borough.

- i. Jim Ratcliffe has reported that that a Mr Stokes was arrested in relation to this incursion and his vehicle had been impounded in relation to the connected fly tipping. However it was ultimately returned as the Environment Agency did not wish to pursue the matter. This was supplemented by emails from Debbie Hanlon an employee who was on site. Ms Hanlon sent Mr Ratcliffe a number of photographic images of the damage being caused by the travellers. Statements were also provided by Gary Berkley, a CCTV operator in the Havering Council CCTV control room. The CCTV captured still images of the travellers dumping on the Regency Homes site.
 - ii. In a letter to Jim Ratcliffe, the previous officer responsible for oversight of unlawful encampment enforcement, Mr Hung provides a breakdown of costs incurred in removing the travellers, dealing with the waste left on site, necessary repairs and additional security measures. This amounts to £101,743.30 excluding the costs of bailiffs.
- d. **Matt Austin**, who is UK Security Operation Manager for Tesco, provides a statement confirming the impact on a number of Tesco Stores within the Claimant's Borough. Specifically, that the retail store are Gallows Corner has experienced 11 unauthorised encampments across 2 years (paragraph 2) which has cost the company £12,500 in evictions and £125,000 in lost business (paragraph 3). The store at Roneo Corner has experienced 3 incursions over 2 years costing £3,500 in evictions (paragraph 15). Finally, the store at Bridge Road has experienced 5 unauthorised encampments across two years costing £6,000 in evictions and £30,000 in lost trade (paragraph 19).

ENVIRONMENTAL IMPACTS ON GREEN SPACE AND DAMAGE TO LAND

33. Environmental impacts are detailed in the following statements.

- a. **Andrew Gouldstone** details incursions which have taken place at an RSPB wildlife park in Rainham Marshes. He is the senior site manager. In his statement he confirms at paragraph 4 that *“the charity... had to clear 16 lorry loads of dumped rubbish, mostly clothing and shoes but also other household and building waste and also left a large skip of building waste”*. He confirms that the site is usually grazed by cattle and that, at paragraph 6, *“the use of the site by travellers immediately creates concerns as they leave the gate open as they enter and leave...this leads to a risk of cattle getting onto the public highway and also puts the wellbeing of the cattle at risk. The cattle are also put at risk by the dumping of waste at the site”*. Mr Gouldstone also confirms that the site is a Site of Special Scientific Interest, and therefore sensitive to the activities experienced during the course of an unauthorised encampment.

- b. **Simon Elgar** is a community ranger with the Forestry Commission and gives details of unlawful encampments on FC land. His statement concerns land located at Ingrebourne Valley. He confirms that, at paragraph 11, *“The subsequent encampments resulted in significant dumping of fly-tip, household and human wastes. The park is a well supported leisure facility and is used by many residents to enjoy the local countryside and wild life. The encampment and its detrimental effect on the area may have deterred some visitors from using what is a publicly controlled benefit.*

- c. **James Sutton** in his statement confirms that Ingrebourne Hill has experienced unlawful encampments and that this is a concerned

due to the designation of the Ingrebourne Marshes SSSI which neighbours the site. He confirms, at **paragraph 6-7**: The site has been notified since 6 March 1989 under the Wildlife and Countryside Act 1989. The reason for the notification as recorded by Natural England is that *“Ingrebourne Valley supports the largest and one of the most diverse coherent areas of freshwater marshland in Greater London. The variety of habitat includes extensive areas of reed sweet-grass and common reed, swamp, wet natural grassland and tall fen. Nowhere else in London do these habitats occur on such a large scale or in such intimate juxtaposition. These habitats also support a rich assemblage of associated invertebrates and breeding birds”*. Natural England also confirms in the designation that the area, which forms the largest reed bed left in London, also supports *“Golden Dock, a nationally scarce plant”*. The area also includes *“16 nationally scarce fly, beetle, dragonfly and cricket species”*. Natural England also publishes a list of *“Operations requiring Natural England’s Consent”*. This lists operations which *“are likely to damage the special interest”*. Of particular note, in relation to unauthorised encampments, are; *“dumping, spreading or discharge of any materials; burning; the release into the site of any wild, feral, or domestic animal, construction, removal or destruction of road, tracks, walls, fences, hardstands...; storage of materials; use of vehicles...likely o damage or disturb features of interest; recreational or other activities likely to damage or disturb features of interest; erection of permanent or temporary structures”*.

34. Damage to land is detailed in the following statements:

- a. **Sebastien Hung** confirms that, following an incursion at Angel Way, at paragraph 16, that *“the travellers ripped one of the metal gates from its post, leaving the other to blow back and forth into*

the road exposing road users to the risk of damage to their vehicles, or injury to their person.

- b. **Andrew Gouldstone** confirms at paragraph 3 of his statement that a chain and padlock were cut in order to obtain access.
- c. **Simon Elgar** confirms, at paragraph 6, that “*recently installed boudlers...had been removed and a second of fence had been damaged in order to facilitate access*”.
- d. **Mike Turrell**, who is employed as a Technical Service Manager with the NHS Property Services, confirms that during an encampment between 19 and 26 April 2016, upon attending the site he noted, at **paragraph 2**, “*I found entrance fencing down, the security lodge empty, and groups of travellers moving around site*”. At paragraph 3 he confirms that “*An assessment to the site was carried out and identified a substantial amount of damage to CCTV systems, the fabric and structure of buildings and street furniture*”.

THREATS AND INTIMIDATION

35. The following witnesses refer to threats and intimidation experience during the course of an unauthorised encampment.

- a. **Dil Singh** details threats and intimidation at an incursion in April 2018, he says at **paragraph 3** “*The travellers used foul language directed out the security officers, and they were racially abused (being called names such as ‘paki’, ‘isis bomber’, ‘black nigger’, ‘Punjabi scum that wrap a cloth round your head’, all of which were deeply offensive to our staff, and is something that no person should ever have to tolerate or experience) and one of the travellers forcibly snatched a chain (chain for a gate) from my colleague’s hand and hurt her in doing so. The injuries, whilst minor, were still traumatic for my colleague.*”

- b. **Sebastien Hung** in his statement at paragraph 5 confirms that a security guard was confronted and, at paragraph 6, that *“our security guard had his own car on the site and tried to stop the unauthorised access to the site by the travellers, however there were too many and they threatened him with violence to make him stay away”*. At paragraph 7 he concludes that *“the travellers placed their own lock on the gates and following a long period of negotiation they allowed our security guard to re-enter the site...in order that he could remove his car. He was told that if he did not do so they would damage his car”*.
- c. **Ilker Dervish** confirms, at paragraph 8 of his statement, that a member of his security team was assaulted.
- d. **Philip Jones** in his statement at **paragraph 8** confirms that laser lights were shone into the eyes of himself and his colleague, during a site visit on 6 September 2016 at Lilliput Open Space.
- e. **Trevor Massie,** at **paragraph 6**, produces an email report confirming that a security guard was assaulted by a traveller *“using his body to push me back”*.
- f. **Tajinder Singh Dhir** at **paragraph 6** reports, in relation to an unauthorised encampment at Palms Hotel in October 2016, *“Mr IP Singh, the then manager of the premises, reported that the travellers had forcibly gained entry to the hotel and in that process, two of the staff members had been injured. The staff were threatened and told that if they returned to the site, they would be killed, and as a result they fled the site. A number of calls were made to the Police but they did not assist, stating it was a civil matter. Mr Singh reports that he spoke with the duty sergeant at 02:30 a.m. re-iterating his frustration that there was no Police support given. He re-iterated the forced entry, threats and thefts.”*

IMPACT ON HIGHWAYS

36. The following have given witnesses detailing how encampments affect, or have the potential of affect, highways:

- a. **Robert Gleed** who is a group manager with the London Fire Brigade, details concerns about waste found at the Palms Hotel site, he emailed Trevor Rockliff of LBH to state **at paragraph 2** *“the concerns I have with the waste left behind...are the potential for deliberate ignition. This has the potential to close one or both carriageways of the A127 due to smoke travel, the positioning of our vehicles and cordons for safety. Also there may be the possibility of discarded LPG and/or other pressurised cylinders that bring their own problems if involved in fire, i.e. cordons/exclusion zones whilst cylinders go through our cooling process”*. He goes on to say (**paragraph 4**) *“Where the Fire Service has to engage in operations at such travellers sites the units are unavailable for fire emergencies elsewhere in London. Across the country fires on land adjacent to main carriageways has caused serious concerns to Fire Officers”*.

IMPACT ON SCHOOLS

37. Schools and educational establishments are regularly selected as sites for unauthorised encampments. Evidence detailing the impact on the schools can be found in the following statements:

- a. **Kevin Sullivan**, who is employed at Havering College, confirms that following an encampment on 6 April 2018 the Police had advised the college must respond themselves. The encampment consisted of 20 caravans which had broken onto the site and *“padlocked the gates back up using their own padlock”* (paragraph 3). The site suffered *“extensive fly tipping”* (paragraph 4). Kevin confirms that *“concerns were raised by students and parents regarding safety issues”* (paragraph 7) and goes on to confirm that the total cost of clearing the land was £25,788 with an additional £5,287.60 in legal fees (paragraph 8).

COMMUNITY TENSION AND CRIME

38. A number of residents have provided anonymous statements, due to fear of repercussions, and detail the community tension which arises as a consequence of unauthorised encampments.

- a. **Resident A** – at paragraph 9 of his statement, alleges that *“They have been treating our front gardens as if they own them, throwing stones at our windows, throwing stones at our cars, damaging plants, pulling down trees, pulling down fences, removing bricks from walls, hurling abuse at anyone that walks near them, hurling abuse at any resident that dares to step out of their house, sexually assaulted 2 young girls and abused a mother with her 4 year old daughter”* and that *“At one stage the abuse was so bad that I had no choice but to dial 999 and ask for urgent police assistance as I feared that my windows would eventually smash”*. At paragraph 10 he details damage to a car, saying *“The car damage was caused after a resident went outside his house to ask the travellers in his front garden to stop picking up stones and throwing them at their elderly neighbours (who are in their late 80's). He didn't say a word to them, just hoped his presence would scare them off his private property...instead he was met With verbal abuse so he felt it best to go back inside and shortly afterwards they smashed his window and keyed his car.”* At paragraph 12, he confirms that the postal service was even disrupted: *“Just spoke to the postman involved and he said that he was threatened and then a large rock I brick was thrown at his van as he tried to get away. This escalated to a point where Royal Mail decided that no more post could be delivered down our road on that day and no more mail would be delivered until the travellers had gone.”*
- b. **Resident B**, at paragraph 13, details the impact on her elderly husband: *“My husband is elderly and suffered a heart attack in 2014, and is on constant medication. He has also been diagnosed*

with Dementia, and every time the travellers set up camp on the green I find it very hard to keep him calm, he wants to go out to them which is such a worry to me, if he was to get involved in an altercation I really don't like to think what would happen. I don't want to leave my house when they are parked on the green but I feel I have to take my husband away out of sight of them and try to stop him getting so uptight and going over to say something, He gets so agitated it's just one big worry for me the whole time. I really do struggle to keep him calm. I have had genuine fear that he may go out and confront them, as his condition worsens when they are around."

- c. **Resident C**, at paragraph 10 confirms that *"Each time I left my property to get into my car the kids would come into my property & abuse & spit at myself & my 5 year old daughter. They use the most foul language that you could possibly imagine & reduce my daughter to tears. As we tried to drive away they tried to get behind our car to stop us."*

- d. **Resident H** at paragraph 12, confirms that *"I went out onto the drive but before I could say anything they had run off onto the green. Sunday 21st late eve/Monday 22nd early, I went out to go to work when I saw the back window of my car was broken and scratched along the side, called police at 5am ref no 5408288/17 reported incident. Police said they can get someone to visit Wednesday 24th earliest (Refused) got ref no. There was over £1000 damage to car"*

- e. **Resident I**, at paragraph 11, confirms *"I have had to close the window of an evening because of the noise of music and shouting. Unsupervised children have come into my garden and picked the flowers. The children have used an outside water tap on the front wall of my house and left it running. My daughter (who had come to stay with me whilst the travellers are here) was sprayed with a*

water pistol when she asked the children to leave. I am 88 years old and cannot chase people off my property. I feel unsafe to leave the house when cars and vans and horse gigs are constantly driving up and down the green. I cancelled a hospital appointment because I was too nervous to go out and leave the house unattended.”

- f. **Resident M** details at paragraph 4 an incident whereby her husband photographed travellers breaking through a gate: *“Four men got out and looked at the gate. My husband guessed what was going on and took a photograph of the four men, the vehicle following was also in the photograph. They started shouting obscenities at my husband and several men walked up to my husband asking him what he thought he was doing. While this was happening other men were opening the gate. I was watching them, and the largest of the men called me a "dirty filthy slag" and asked me what I thought I was looking at.”*

39. Inspector **Richard Carter** in this statement refers to the following incidents, amongst others, where there has been significant criminal activity:

- a. *“Paragraph 7.3 - 2016 Havering College, New Road, Rainham (off Rainham Steel) CAD 3519- An informant contacted the police and stated that 10-15 caravans had forced their way onto the site, pushing a security officer out of the way and gaining access to the GLA site next door to the college by breaking down a wall. Police attended the site and a standoff occurred between the police and approximately 20 male travellers who were acting aggressively. It was also reported that the travellers were throwing stones and had brought their children with them to the site.”*

- b. *"Paragraph "7.18 16/07/2016 Hornchurch High Street CAD 3739 and Crimint 5412007/16 RDC/75. The victim was parked in the entrance/exit of the Bingo Hall car park at this location, whilst he dropped his children off at the early learning centre. Whilst he was parked at this location he was approached by 3 male youths from a group of travellers that had formed an encampment in the car park. They told the victim to leave. The victim refused. The suspects then started hitting his vehicle with brooms that they had in their hands, causing several dents to the body work of his vehicle."*
- c. *"Paragraph 7.23 - 1/08/2016 Consul Avenue, Rainham CAD 10092 , 5412995/16 RDC/69. The victim was on duty as the sole security guard based in a small office cabin at the front entrance to the gated site. Victim 2 was on mobile security in a vehicle covering numerous sites. On 01/08/2016 at 2320 hrs VIW1 contacted VIW2 stating that a convoy of approximately ten vans and caravans had turned up outside the main entrance gate. Within seconds a group of males described by VIW1 as being from the travelling community, with Irish accents, proceeded to cut open the metal bolt lock on the main front gate using a handheld grinder, causing damage estimated at £200."*
- d. *Paragraph 7.34 "6/09/2016 Liliput Road - 5415048/16 –CAD 10228/6SEPT16. The same males believed from the travellers' site, were on Liliput Road have just come to my address and have smashed the front door with a metal pole. They have knocked it off its hinges East Road is a secluded back street which is dimly lit at this time of night. The victim stated that he was upstairs when he all of a sudden heard a bang from outside, he looked out of his top bedroom window which is situated at the front of the house. He saw 2 IC1 youths. One was standing just on his driveway and the other approached his front door with what appeared to be a long*

metal pole. He then heard loud banging at his front door. Both males then walked away from his front door.

He said that this all stemmed from travellers arriving in the area and causing a lot of ASB. He said at one point he called police because a pizza delivery driver was being robbed by a group from the caravans, and they were basically hanging around all night causing noise and damage.”

- e. Paragraph 7.35 07/09/2016 RDC/56 - 5415042/ – *“Criminal Damage. [No CAD as report via out telephone investigation unit] The victims live on the end house of East Road, 50m away from the park on Lilliput Road. There is an ongoing incident with Irish travellers having set up camp inside the park. It is believed that this incident has been committed by a member of this community. A group of children knocked on the door of No [x] and asked if they could use their toilet. The home owner replied that they could not. The suspect then proceeded to urinate and poo on the driveway. The human excrement was then put through the letter box and smeared all over the front door.”*
- f. Paragraph 7.39 04/10/2016 Palms Austin Hotel, Southend Aterial Road, Hornchurch CADs 9419, 9540, 9658, 9677,9746,8006, 8361,8819,8827,9419 Exhibits RDC 47, 48, 51-52 *Travellers formed an encampment outside the hotel including approximately 30 caravans, the travellers then accessed the hotel, ejected the staff form the hotel, removing some with physical force and made threats to kill and ransacked the hotel. Callers from the hotel confirmed that the travellers were forcing entry using what was believed to be a chain saw. Staff at the hotel explained to the police that travellers had broken into the hotel car park by bending the electric barrier back to allow vehicles and caravans in. They also explained that the CCTV cameras had been broken by the travellers once they got on site. The staff explained that no one saw who broke the barrier and no one on site had access to the CCTV footage. Victim and the informants explained that they live at the Palm Hotel and have their own living area, their job is to*

protect the Hotel. Victim has provided a statement and in that explains that there were a number of people knocking on the door and all around the windows of the Hotel, he has then gone to check the front door to make sure it was locked. At this point the door has been pushed open and the six suspects have pushed through the door, they have then surrounded victim, one of the suspects have then grabbed his right wrist and 3 suspects have pushed both victims out of the door and said to go or they will kill them and then said "this is our hotel now". Victim has sustained a small and minor cut to his right arm next to his elbow, additionally he informed Police that he was hit with a sledge hammer, over the calf of his left leg. Victim refused to provide a statement and go to court re the injuries.

- g. Paragraph 7.49 "21/05/2017 CAD 3905, 6622 and 4928-Barnstaple Road Romford Exhibit RDC 38. An informant contacted the police and explained that a male traveller from an unauthorised travellers' encampment at their local park, approached her daughter (a girl of school age) and sexually assaulted her daughter, by pulling her towards him by the waste and touching her genitals. The police received 90 calls concerning the encampment and further reports that this male traveller was attempting to dry hump other female school children accessing the park on their way back from school. The informant explained that her daughter was frightened that this would happen again and that the informant was taking her daughter to and from school as a result of this incident and was concerned it may happen to other children."*
- h. Paragraph 7.66 01/09/2018 CAD 6748, 6706, 6696, 6085, 3633, 3170, 3072, 2980, 2615, 2153, 2127, 1870 The Palms Hotel, Southend Arterial Road, Hornchurch Exhibit RDC [ENTER NUMBER] An informant contacted the police and confirmed that "loads of travellers are arriving at the location...subjects have broken the barrier to our car park to gain entry...the travellers are blocking the road and the car park area...some of the travellers*

are running around the car park. Approximately 20 vehicles were in the car park by the time the informant called and the rest were in the road causing obstruction. Another informant contacted the police and claimed that there was “loads of trouble” at the location and that the travellers were riding around on quad bikes and nearly knocking over children. The young males on bikes surrounded a police vehicle that attended to prevent them following the quad bikes onto the site and threw bricks and bottles at the police car causing them to have to reverse out of the site. Reports were received of damage to a JCB digger on a neighbouring site and was directly linked to this encampment. Travellers were also reported to be throwing bottles into local residents gardens and disturbing residents by riding around all night on scrambler bikes. Further calls were received from local residents about the all night disturbance caused by the travellers driving up and down the road.”

i.

FINANCIAL COST

40. **Trevor Massie** confirms, at paragraph 12, *“In summary, a total of £256,646 inclusive of additional security measures and fees is estimated to be the cost of dealing with the 9 incursions. This level of expenditure cannot be sustained and action is required to immediately remove the travellers when they make an unauthorised incursion onto GLAP land. As stated previously, if travellers are removed immediately there is little opportunity to fly tip material onto GLAP land.”*
41. **Michael John Turrell**, who is the Technical Service Manager for NHS Property Services, confirms at **paragraph 4** that *“The total cost of legal, eviction and clearance was in excess of £59,000. This is not inclusive of the cost in hours of all employees of NHS PS involved in the process.*

NHS PS is owned by the secretary of state for Health so all costs are ultimately picked up by the taxpayer.”

42. **Sebastien Hung** produces Exhibit SH/X, a letter to myself, which confirms total cost of dealing with the encampment as being £109,385.

43. Inspector **Richard Carter** refers to certain crime reports where significant financial loss is reported:

- a. Paragraph 7.24 – *“01/08/2016 RDC/61 - 5413965/16 – Burglary Non Dwelling Linked CAD 4614/17AUG16 [CAD provided] QUANTUM CONSTRUCTION took possession of the venue and employed a security company to secure it. On 12/08/2016 a large group of travellers moved onto the site. From the time the travellers moved onto the site the informant was unable to access the site. The victim had placed his own handmade trailer inside the venue with his own personal tools on. The Travellers were evicted from the site on 17/08/2016. The victim gained access to the venue and saw that his trailer was missing from inside the venue and that the entire floor of the warehouse had been fly tipped. Upon speaking to the victim, he stated that he had received a quote for clearing the venue estimated to be £100,000. Access had been gained to the warehouse by damaging the front door of the venue.”*

Education Links

44. I have made enquiries and am informed that it appears there are 43 Gypsy/Roma children registered to Havering Schools. Defendants, belonging to four family groups, appears to have 6 children registered in Havering Schools, although some have left secondary education.

Housing/Homelessness

45. There have been 10 homeless applications in 2018-2019 from Gypsies and Travellers. Two were as a result of evictions from 'permanent' travellers sites, four were from end of private rented brick and mortar tenancies, and four were from families no longer willing to be accommodated in bricks and mortar. There were zero as a result of any 'unauthorised encampment' of the nature sought to be prevented by this injunction.

Section 149 Equality Act 2010

46. An Equality Impact Assessment is required to assist the council in demonstrating it has complied with its Section 149 Equality Act Duty. It is used as the basis for making a decision to proceed with an injunction. An EQiA has been completed and approved which I produce and am shown as **Exhibit RH/6**.

Conclusions

47. In the last three years there has been an increase in the number of unlawful encampments, leading to increased pressure on Police and Local Authority officers to utilise their powers and resources. There has also been increased pressure on private utilities to utilise their resources

to secure removal of unauthorised encampments. Despite the use of these powers travellers move from location to location within the borough, and, revisiting old sites. Some encampments can last for significant periods of time. It is apparent therefore that nothing short of an injunction in the terms sought in the draft order will prevent these unauthorised encampments with the associated harm are causing the population. Hence, why we seek injunctive relief.

48. The travellers conduct is a breach of planning control and cause nuisance to the settled community. The identified defendants flout the law causing harassment, alarm and distress to members of the community and businesses. The Council have weighed up the travellers needs against this action in coming to this conclusion but feel it is proportionate, necessary and reasonable to seek an injunction. The council appreciate that the unlawful actions and commercially motivated fly tipping does not represent the actions of the vast majority of the Gypsy and Travelling community. It represents the actions of a small, determined minority who are having a significant impact on the quality of life of those in the vicinity.

49. No witnesses from the travelling community on these sites have assisted the Police or Council in any prosecutions and names and addresses are not generally supplied. The Council is respectfully of the opinion that as evidenced from above, and contained in all evidence filed in support of this claim, that it is expedient for the promotion and or protection of the interests of the inhabitants of Havering to seek an injunction. That there is clear evidence that harassment, alarm and distress is being caused to many of those working and living within Havering and the considerable costs are being incurred for evictions, clear up costs of the waste left behind and the cost of target hardening.

Signed: Robert Harper

Robert Harper

Dated: 26/7/2019

Claim Number: _____

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING
Claimant

Mandeep Mehat
London Borough of Havering
Town Hall
Main Road
Romford
RM11BB

On behalf of Director of Law and Governance, Solicitor for the Claimant

REF: /Traveller's Injunction
Tel:
Email:

**Claimant
First
Exhibits:MM1
Date: 24.7.2019**

**IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION**

Claim Number:

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

-and-

- (1) WILLIAM STOKES & OTHERS LISTED IN
SCHEDULE 1 OF THE CLAIM FORM**
- (2) PERSONS UNKNOWN FORMING OR
INTENDING TO FORM ENCAMPMENTS IN
THE LONDON BOROUGH OF HAVERING**

Defendants

WITNESS STATEMENT OF MANDEEP MEHAT

I MANDEEP MEHAT, a solicitor employed by OneSource Legal Services (on behalf of London Borough of Newham and London Borough of Havering) based at 1000 Dockside Road, London E16 2QU will say as follows:

1. I make this statement on behalf of the Claimant, the London Borough of Havering "the Council" in support of its application for an injunction and interim injunction to prevent persons known and unknown from unlawfully encamping on the named sites identified in the Witness Statement of Robert Harper. The contents of this

witness statement are true to the best of my knowledge and belief , save for where I indicate to the contrary, in which case I have set out the source of my knowledge.

2. I produce and am shown **Exhibits MM1**.
3. Since 2016 the Council has had an influx of unauthorised encampments; these have mainly been travellers, and the ethnicity of some of the travellers is unknown. This has resulted in 96 encampments in total. Clean up costs between 2016 to date total £162,467.30 to the Council (see witness statement of Deborah Ferry). In addition to this, some of the incursions require the intervention of the police and the exercise of their powers under s.61 of The Criminal Justice and Public Order Act 1994.
4. A number of proceedings against travellers are brought pursuant to section 77 and section 78 of the Criminal justice and Public Order Act 1994. Once the papers for these Orders are issued on the travellers at the unauthorised encampment, the papers include the Summons / Order for Removal of Vehicles etc., witness statements with plan of the location , exhibit photographs and so forth. An officer of the Council is required to serve these papers 24 hours prior to the hearing date. In the majority of all cases, the travellers wait to be served with these papers with the hearing date, and then proceed to move to another site within the borough. The Order under Section 78 is only valid for a period of three months. Following this a different set of Travellers have used the same site, therefore sites are encamped repeatedly. The Council is then put to the effort, time and expense of applying for separate section 78 Orders.
5. The sites in which travellers have encamped on are identified in the witness statement of Robert Harper.

6. On 1st April 2014 The London Boroughs of Newham and Havering established a joint committee under s.101 (5) of the Local Government Act 1972 for the discharge of various executive and non-executive functions of each authority via shared arrangements. A Scheme of Delegation to officers from OneSource Joint Committee of participating authorities was agreed on 18th March 2016.
7. The Deputy Director of Legal and Governance (OneSource) who as a Level B Officer under the 'One Source Joint Committee Scheme of Delegation, Appendix A Joint Committee Schedule of Delegated Powers' has the delegated authority to:

C1. To take any action to commence and / or conduct any civil or criminal proceedings on behalf of a participating Council, including but not limited to the instruction of counsel or expert witnesses, any action etc.

C2. To institute proceedings under s.222 of the Local Government Act 1972 on behalf of a participating Council and to take action to represent the authority in those proceedings.

Please see attached a copy of the above document referred to as **Exhibit MM1**.

8. The proceedings have been authorised by the interim Deputy Director of Legal and Governance. The decision maker has been briefed on the impact of the decision on the travellers who have protected characteristics affording them protection from discrimination under The Equality Act 2010 . This includes advice on impact on Human Rights legislation and applying the test of proportionality. There is no specific duty to prepare an Equality Impact Assessment , however an Assessment has been prepared to assist the decision maker to make the decision to instigate proceedings.

9. In making this decision the Authority has considered balancing the rights of each group, and after consideration has concluded the action of Travellers is having a disproportionate affect on the settled community. The decision has been taken to proceed with an application for a Part 8 Injunction in the High Court.

10. The Council has had regard that there appear to be a core group of travellers who repeatedly chose to form unauthorised encampments in the borough and continue to occupy unauthorised sites. These are named within the Map annexed to the Claim Form and Particulars of Claim. Therefore the Council seeks a Borough Wide Injunction against these individuals. In addition, there are also other Travellers which the Council cannot identify who have set up unauthorised encampments at various sites throughout the borough, which have also been identified on the Map. Therefore the Council seeks an Order against persons unknown against those Travellers who the Council cannot name, which is limited to the sites listed on the Schedule attached to the Draft order provided with the Council's application.

11. The Council has liaised with the police over the action taken to date and this application for an interim injunction and injunction against Travellers. It is apparent this is now the last resort and an injunction is necessary to stop the persistent unauthorised encampments in the Borough. The Council is seeking an interim injunction which is required pending consideration of the final order , which the Council accepts, with the number of Defendants involved, might not be fully considered for some time. When considering the interim injunction, the Council is of the view this is now the only way to prevent any further unauthorised encampments.

12. I am familiar with the case of *American Cyanamid Co v Ethicon Ltd* (1975) A.C. 396 and the key principles derived from that case that the Court must apply when considering this application. I make the following points in relation to that case:

(i) *There is plainly a serious issue to be tried and the Claimants have a good arguable case, and damages would not be an adequate remedy, as is apparent from the supporting evidence presented with this application.*

(ii) *Accordingly, the balance of convenience lies with granting the injunction as otherwise the unauthorised encampments, health issues, impact on the businesses and the settled community and environmental impacts from fly tipping, will continue. It has been demonstrated over the last year that alternative measures have not resolved the issue, which could take some time to resolve.*

13. The Claimants respectfully submit that in accordance with the decision in *Kirklees Metropolitan Borough Council v Wickes Building Supplies Ltd* [1992] 3 W.L.R. 179 the Court ought not to require the Claimants to provide a cross-undertaking in damages where the Claimants is a public authority carrying out its administrative duties by seeking an injunction.

14. Accordingly I respectfully request that the Court grants the injunction in the terms provided, or alternatively on terms it thinks fit on an interim basis pending final Order.

I believe the facts stated in this witness statement are true

Signed: M . 

Name: MANDEEP MEHAT

Date: 29/7/2019

Claimant
Mandeep Mehat
Second
Date: 26/7/19

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Havering

Claimant

and

**(1) WILLIAM STOKES & 104 OTHER NAMED DEFENDANTS
(106) PERSONS UNKNOWN**

Defendants

SECOND WITNESS STATEMENT OF MANDEEP MEHAT

I MANDEEP MEHAT, a solicitor employed by OneSource Legal Services (on behalf of London Borough of Newham and London Borough of Havering) based at 1000 Dockside Road, London E16 2QU will say as follows:

1. I make this witness statement in support of the Claimants application for various service Orders prior to service of the above named proceedings. The Claimant seeks an interim and mandatory injunction pursuant to section 222 Local Government Act 1972, section 187B Town and Country Planning Act 1990 and/or section 1 Anti-social Behaviour, Crime and Policing Act 2014, in the terms set out in the draft Order. The Order is sought against the 105 herein named Defendants and Persons Unknown, and concerns to date 96 unauthorised encampments formed by the Defendants in the Borough of Redbridge between 2016 and to date. These encampments have included significant numbers of people at times, including an extended encampment at the Pompadours Pub between March and May of 2018 and resulted in extensive fly tipping. The unauthorised encampments have been formed in public spaces, schools, children's play areas, the business parks and industrial estates within the Borough,

highways, sports clubs and car parks. The encampments have caused significant nuisance and community tension for the following reasons:

- (i) Because the settled community and local businesses believe that the Travellers are being allowed to flout the law;
- (ii) The encampments are causing serious nuisance and annoyance to the settled community, including forced entry to a number of sites and premises.
- (iii) The encampments leave behind untreated human excrement as the Travellers do not use the toilets within their own caravans. Human excrement has been found on sites where Defendants have formed encampments within the Borough. This has also been identified as a risk to human health in the witness statement of Martin Grant who is qualified in Environmental Health, as detailed in their witness statement.

Due to the level of encampments and the time it might take to locate and serve this evidence on the Defendants I am seeking an Order on behalf of the Claimant that the injunction is listed before a Judge on a date after 31 August 2019 to ensure the Council has 3 clear days between service of the proceedings and the hearing date. I would also respectfully request that the hearing is allocated a 2 hour time estimate.

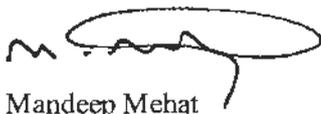
3. Male Gypsies and Travellers usually leave for work early in the morning and do not return until later in the evening. Accordingly, the Claimants also seek permission to serve the Defendants between 6.30am and 8pm during the week and between 7am and 4pm on a Saturday, with an Order that Claim forms and Applications served on a Saturday will be deemed served on the next working day and Claim Forms and Applications served after 4pm on a working day shall be deemed served on the next working day.
4. Travellers can be difficult to serve and there is no guarantee that they will open the door to their caravan, mobile home, or, brick and mortar property if they believe they will be served with court papers. In the event that the Claimants are unable to personally serve any of the 1st to 105th Defendants, the Claimants seek an order giving them permission pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 to serve any of these Defendants that cannot be personally served, by leaving a copy of the application notice, claim form, draft order and supporting evidence in a clear transparent envelope and affixing the same to a Caravan or Mobile home, front door, or, other vehicle of which it is reasonably believed is occupied by the Defendant, or, Defendants that the Claimant has been unable to personally serve. I would also respectfully request that any Claim form and application notice served by this method will be deemed served the next business day after service of the application and Claim Form . The

Claimant would also seek and order giving permission to serve by letter box service at any known address if the Claimant is unable to effect personal service at that address.

5. There are [X] lever arch files of supporting statements and evidence in this matter. Exhibits total over [XXXX] pages. There are 105 named Defendants that each require a copy of the evidence to be served on them. This would be an enormous amount of paper work and expense which no doubt would be difficult for the Travellers to store in their caravans as many of them are living in small touring caravans with the their families. Accordingly, the Claimants proposes that it shall be permitted to serve the evidence in support of the Claim and application for an interim injunction by USB memory stick and shall provide any Defendant that requests hard copies of the same within 2 workings days of receipt of such request and shall have a copy of all evidence relied upon in these proceedings available for inspection at the Council offices at Romford Town Hall between the hours of 10am and 4pm Monday to Friday excluding public holidays.
6. The Claimants also seek an Order that the Claims and Application shall be deemed served on Persons Unknown by serving a copy of the Claim Form, Application Notice and Draft Order on all sites identified in Schedule 2 of this Order by affixing them in a prominent place on the Land with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from Romford Town Hall.

STATEMENT OF TRUTH

I believe that the contents of this statement are true.

A handwritten signature in black ink, appearing to read 'Mandeep Mehat', is written over a horizontal line. The signature is somewhat stylized and includes a large loop at the end.

Signed : Mandeep Mehat

Dated : 26 July 2019

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

LONDON BOROUGH OF HAVERING

CLAIMANT

AND

(1) WILLIAM STOKES AND 104 OTHER DEFENDANTS NAMED IN SCHEDULE 1

AND

(106) PERSONS UNKNOWN

DEFENDANTS

WITNESS STATEMENT OF RICHARD CARTER

I Inspector Richard CARTER currently employed as a Partnership and Prevention Inspector within the East Area BCU, Neighbourhood portfolio at Hornchurch Police Station WILL SAY AS FOLLOWS.

1. I make this statement in support of the Claimant's claim for an injunction against the above named Defendants. The facts in this witness statement come from my own knowledge or, where they are not from my own knowledge, they are true to the best of my knowledge and belief.
2. I have been employed by the Metropolitan Police for approximately fifteen years. I was tasked to compile a list of incidents that Havering Police and now East Area Police have received regarding traveller encampments within the administrative boundaries of the London Borough of Havering. This is a dip sample of calls received in relation to this issue, which affects Havering Borough on a regular basis. This covers a time period of two years from 2016 to 2018. This is by no means a total of all the incidents dealt with during this time. All reports have been summarised where appropriate to give an understanding of the nature of the report, some of which can be many pages long. The reports have been exhibited to my witness statement and have been redacted where appropriate to protect the identity of the informant or victim.

3. These calls all relate to incidents involving members of the travellers encampments and the resources that it takes to deal with these calls.
4. All calls that are received at the emergency call centres generate an individual reference number. This information is placed onto the computer aided dispatch system referred to as CAD. On the CAD is the type of call and other information that would be useful for the officers attending. The calls are then resulted on there. If other calls are received regarding the same location, generally they are linked to the original CAD and closed. Leaving the first CAD as the working one where all the information will be placed.
5. General response policing has a very limited number of officers that are dedicated to answering the emergency calls. Depending on the type of incident denotes how many units may attend. However if units are already dealing with other calls that depletes our available resources. For large disorder incidents, we have to request off borough specialist units such as the Territorial Support Group (TSG). Due to the nature of the calls and the numbers of the travelling community present to provide a response to these calls can mean utilising numerous local assets as well as requesting central pan London resources, which has the effect of limiting our ability to respond to other calls for assistance, it also has significant financial impact on the service.
6. I have not been able to show the length of time spent dealing with these incidents. However on viewing the reports below they have required Police deployment or action on sixty two (62) days over the two year period, generating twenty nine (29) crime (CRIS) reports and fourteen (14) intelligence (Crimint) reports. This does not include the length of time actually spent at each deployment or the officer numbers required or the other paper work that may be required following each deployment. I have not been able to generate an exact costing; however the average cost of one police officer per hour is £16.53.
7. The incidents below are a summary of the relevant CAD's identified from the dip sample. The full CAD reports are exhibited to this witness statement at Exhibits RDC/1 to RDC/69.
 - 7.1. 02/03/2016 78 Straight Road, Harold Hill. CRIS 5404373/16, CAD 3943/02MAR16.
Exhibit No. RDC/1 –An informant contacted the police and reported that travellers had broken locks to gain access to the site, which she owns. The matter was referred to the local authority.

7.2. 09/03/2016 Lower Bedfords Road, Romford. CRIS 5404048/16, CAD 2080/09MAR16. Exhibit No. RDC/2 - A group of travellers gained access to the land used by the business Chaucer Stone located on Lower Bedfords Road and formed an encampment including 7 caravans. It is noted on the CRIS report that it is believed in order to gain access, a lock on the gates had been broken but this could not be proved. Police were informed that the landowner was in the process of seeking a court order to remove the travellers from the site.

7.3. 05/04/2016 Havering College, New Road, Rainham (off Rainham Steel). CAD 3519/05APR19. Exhibit No. RDC/3 - An informant contacted the police and stated that 10-12 caravans had forced their way onto the site, pushing a security officer out of the way and gaining access to the GLA site next door to the college by breaking down a wall. Police attended the site and a standoff occurred between the police and approximately 20 male travellers who were acting aggressively. It was also reported that the travellers were throwing stones and had brought their children with them to the site. The site owner, the GLA, obtained a court order, and the police provided support to the bailiffs in removing the travellers from the land on 06/04/2016. The travellers only moved as far as the other side of Havering College. Offences of criminal damage and common assault were recorded against the group. Vehicle registration checks confirmed that vehicles were present on the site that were either owned or insured by the following individuals:

VRM BV60KAK - Change of keeper since coming to notice.

VRM LN64WWU – Change of keeper since coming to notice.

VRM LT54OVF – Change of keeper since coming to notice.

VRM GY53NZZK – White Ford Transit Panel Van. Keeper since 21/07/15 [REDACTED]

VRM BU56ECV – Change of keeper since coming to notice.

VRM CP55HKF – Change of keeper since coming to notice.

VRM X483PSL – Change of keeper since coming to notice.

VRM SG65BFV – Change of keeper since coming to notice.

7.4 19/04/2016 St Georges Hospital, Hornchurch. CRIS 5406479/16, 5406477/16 and CAD 2776/19APR16. Exhibit No. RDC4 - The police attended the St Georges Hospital which is a disused building spanning 62 acres and several buildings following a call from an informant explaining that travellers had moved onto the site and threatened to kill him. There were security staff present on the site, who resided on site, the site is protected by high fences, chains and padlocks. A large convoy of cars and caravans pulled-up outside the locked gates. Numerous white males of varying ages then jumped out of the van and ripped apart the gates, breaking the chains and padlocks in the process. The procession of vehicles then proceeded to drive onto the site, driving past informant who was out walking his security dog on the site. A white Ford Transit van drove past informant and the front passenger, a male wearing a flat cap, lifted up from his lap what informant described as a rifle. Black metal barrel, wooden handle, sight on the barrel. The suspect raised the firearm up to shoulder height and then placed it down onto his lap again. The suspect stared at the informant as the van drove past, however no words were exchanged between the two. The CAD report confirms approximately 20-40 caravans moved onto the site. During this incident, a camcorder was stolen from a security van, valued at £200. Damage caused to the front metal gates, padlock and chains, valued at under £500. The presence of a firearm could not be confirmed by the police. Accordingly, Trojan units were not deployed. The NHS were advised by the police to obtain an injunction and to be aware of potentially further thefts and criminal damage. Vehicle registration checks confirmed that vehicles were present on the site that were either owned or insured by the following individuals:

VRM K9CPV – Black Kia Sedona Le Auto MPV. Keeper since 19/04/2013 Mr Barry Philip Haward, 1 Waterloo Close, Hilcote, Alferton, DE55 5HG.

7.5 19/05/2016 Building site, Lowen Road, Rainham. CAD 4804/20MAY16 and Crimint KDRT00320607. Exhibit No. RDC/5 - Travellers set-up on site. At 12:00hrs on 20/05/2016 the ASB officer for Circle Anglia Housing Association issued a Notice to Quit to the travellers and attached two notices to the front and rear gates of the building site.

7.6 03/06/2016 The Broadway, Rainham, RM13. CAD 2074/03JUN16 and Crimint KDRT00321011. Exhibit RDC/6 - Police attended to assist with eviction of travellers from this site. The travellers had armed themselves with baseball bats, and in addition to the 10 officers and dog unit that were present, further police assistance was requested. Officers attended with bailiffs to assist in executing the eviction of these travellers. The travellers were refusing to leave the site and stated that their family had issues in Newport Wales with the same bailiffs and were refusing to co-operate with the bailiffs because of their action in Newport. TSG were called to support the eviction. On hearing that TSG were being called, the remaining travellers stated in no uncertain terms that they would leave if the bailiffs left. Accordingly, officers called off TSG and told the Bailiffs to wait in the adjacent building giving the impression that they had left and tactically withdrew most of the officers to a neighbouring building. The travellers left then left the site. The report states it is believed that the family of travellers were the Stokes family but this was not verified. Vehicle registration checks confirmed that vehicles were present on the site that were either owned or insured by the following individuals:

VRM KRZ6954 – Change of keeper since coming to notice.

VRM IXZ5565 - Change of keeper since coming to notice

VRM DY08UJX – Change of keeper since coming to notice.

VRM LD11EGV - Change of keeper since coming to notice.

7.7 11/06/2016 New Road, Rainham. CAD 8196/11JUN19. Exhibit No. RDC/7 - An informant contacted the police and confirmed that travellers with five caravans had set-up an encampment on an industrial site at this location. As the land was privately owned, the Police were not involved in the eviction of the travelers.

7.8 23/06/2016 Lowen Road, Rainham. CAD 3795/23JUN16, CRIS 5410686/16. Exhibit No. RDC/8 - Informant spoke with police on behalf of victim who witnessed the incident. Informant works for Orchard Village (organization in charge of the new estate on LOWEN ROAD). The informant explained that travellers broke into one of the building sites and moved caravans onto the site. The encampment was removed on

20/06/2016 following a court order. The informant works as an ASB officer - he was employed to observe the site and note any registrations on the site of any vehicle involved in fly tipping or cause damage. The cost of removing the fly tipping was estimated to be £250,000-£300,000. Vehicle registration checks confirmed that the vehicles noted as taking part in the fly-tipping were either owned or insured by the following individuals:

VRM PY43 JRZ – Change of owner since coming to Police notice.

VRM DX03 FKH – White LDV 400 Convoy tipper. [REDACTED]
[REDACTED]

7.9 28/06/2016 Marsh Way/Shanks Way Rainham. CAD 8422/28JUN16. Exhibit No. RDC/9 - Fifteen to twenty caravans attempted to break into a premise at this location causing a disruption to the highway. Vehicles moved off this site without the need for further action.

7.10 28/06/2016 The Leisure Centre, Noak Hill Road, Romford. Crimint KDRT00321723, CAD 2443/28JUN16. Exhibit No. RDC/10 - Police were called to land at this location where the new leisure centre was being built. Travellers had formed an encampment at this location including four vehicles. The Police spoke to the travellers and they stated that the Police had already attended. They stated they would move on once a court order has been issued.

7.11 01/07/2016 Mudlands Trading Estate, Rainham. CAD 9480/01JUL19. Exhibit No. RDC/11 - Twenty-five travellers with approximately 8 caravans formed a location at this site. The site owner called the police and stated that the travellers were standing around his car intimidating him and not allowing him to leave his own car park, and that they were putting children in front of his vehicle to stop him moving his vehicle. Two Police units were assigned to deal with this complaint. Informant stated that 8 caravans currently on site however now all is peaceful.

7.12 02/07/2016 Beam Reach Business Park. CAD 6780/02JUL16. Exhibit No. RDC/12 - Seven caravans at the location, reports were received of children throwing stones at cars and playing in the road. An informant confirmed to the Police that more caravans were parked-up on the road waiting to get in.

- 7.13** 09/07/2016 The Green, Wincanton Road, Romford. CAD 1813/09JUL16. Exhibit No. RDC/13 - An informant contacted the police and confirmed that four large caravans, associated vehicles and a horse have parked-up on the green next to her house.
- 7.14** 11/07/2016 WINCANTON ROAD, Harold Hill. CAD 2744/11JUL16 and Crimint KDRT00322088. Exhibit No. RDC/14 - Reports were received of a travellers' encampment at this location. The Police attended with the local authority and the travellers were served with notice to leave the site and find a more suitable place to park their vehicles and caravans. There were around nine to ten caravans on the grass area of Wincanton Road, this area runs the length of Wincanton road between North Hill Drive and Tee's Drive. The grass area backs onto Noak Hill Road. There was a number of children living on the site as well as around 2-3 horses. The local authority required the travellers to leave the site by 9am on 12/07/2016. All of the travellers that were present on the site seemed agreeable whilst officers and local authority were dealing with them and said that they were only at this site for a couple of days before moving on. One of the travellers informed the police that as soon as they were kicked off of the site they would just go across North Hill Drive to the other open green area just past Ashbourne Road.
- 7.15** 11/07/2016 118 High Street, Hornchurch. CAD 3139/11JUL16, CRIS 5411693/16. Exhibit No. RDC/15 - Police attended Pound land, High Street, Hornchurch after a call was made to the police from staff stating they have just had shoplifters make off with goods. On arrival suspects had made off into the traveller encampment that was encamping at Mecca Bingo car park Hornchurch. The manager stated that the suspects had walked into the store with a black wash bags, they had put toys and several sweets into their bags. On leaving the store they were challenged by the informant and manager, the suspects then struggled with staff. The informant was hit on the back with what he thought was a grey toy plastic gun, after speaking with witnesses and the suspect it appears it was a plastic hand held fan. The police attended the traveller encampment at the car park next to Mecca Bingo, High Street, Hornchurch and the adults at the location went and got all three suspects responsible from the descriptions given to them by the police. All three suspects admitted the theft, but not assaulting victim as they stated they were struggling to get away. Due to the age of the

suspects, the victim was happy to proceed by way of words of advice and banning them from returning.

7.16 15/07/2016 Whitchurch Road, Romford. CAD 9152/15JUL16. Exhibit No. RDC/16 - Travellers were reported to have moved onto a green area and were reported to have been driving around the area they had encamped on.

7.17 15/07/2016 Chudleigh Road, Harold Hill, RM3. CAD 7535/15JUL16 and 7655/15JUL16. Exhibit No. RDC/17 - An informant contacted the police and confirmed that 10 traveller's caravans had pulled onto the green at this location to form and encampment and that they believed that more were coming. This was believed to be associated with an illegal horse race that was to take place in the area. The CAD report states that the travellers were believed to have moved from another encampment in the area, having been moved on by the authorities. Further calls were received confirming the travellers had moved onto a field at this location including about 60 people and 20-25 caravans (CAD 7631/15JUL16).

7.18 16/07/2016 Hornchurch High, Hornchurch, RM12. CAD 3739/16JUL16 and CRIS 5412007/16. Exhibit No. RDC/18 - The victim was parked in the entrance/exit of the Bingo Hall car park at this location, whilst he dropped his children off at the Early Learning Centre. Whilst he was parked at this location, he was approached by 3 male youths from a group of travellers that had formed an encampment in the car park. They told the victim to leave. The victim refused. The suspects then started hitting his vehicle with brooms that they had in their hands, causing several dents to the bodywork of his vehicle. An adult from the traveller encampment then walked over to the youths and walked them away from the victim's car.

7.19 20/07/2016 Priory Road, Noak Hill, Romford. CAD 4748/20JUL16. Exhibit No. RDC/19 - An informant called and reported an encampment that had formed on the green at this location. The location was the grazing area for deer. The informant also complained that traveller's vehicles were blocking the access to their driveway. The police attended and confirmed that the travellers were moved off of this site, but that they simply moved to a grassed area on the other side of the road. The matter was referred to the Council to manage.

7.20 21/07/2016 Havering Park. CAD 4307/21JUL16. Exhibit No. RDC/20 - Travellers were reported to have moved onto the open space at the rear of the Pinewoods P/H, Collier Row that is part of Havering Park. The encampment included 4 caravans, 3 vans and 1 car on the site. The Parks Police managed this encampment. The travellers were served with notices to leave and informed the Parks Police that they planned to move off the site by 3pm that day. Vehicle registration checks confirmed the following vehicle present on the site:

VRM XFZ3076 – White Ford Transit panel van. No keeper shown.

7.21 22/07/2016 Bonzer Farm Malborough Road, Romford. CAD 3533/20JUL16. Exhibit No. RDC/21. 20 Caravans were reported to have moved onto this site without the landowner's permission.

7.22 22/07/2016 Wincanton Road, Romford. CAD 3537, 4083, 4341, 7333 and 9652/22JUL16. Exhibit No. RDC/22 - The police received information that up to 15 caravans formed an encampment at this site on the grass verge with associated vehicles, dogs and horses. Complaints were received that the travellers had scramblers and quad bikes at this location, which were being used by young children without helmets and were causing a nuisance.

7.23 01/08/2016 Consul Avenue, Rainham. CAD 10092/01AUG16, CRIS 5412995/16. Exhibit No. RDC/23 - The victim was on duty as the sole security guard based in a small office cabin at the front entrance to the gated site. Victim 2 was on mobile security in a vehicle covering numerous sites. On 01/08/2016 at 2320 hrs VIW1 contacted VIW2 stating that a convoy of approximately ten vans and caravans had turned up outside the main entrance gate. Within seconds a group of males described by VIW1 as being from the travelling community, with Irish accents, proceeded to cut open the metal bolt lock on the main front gate using a handheld grinder, causing damage estimated at £200. VIW1 was powerless to prevent this damage, this group of males then drove their vehicles onto the site. This group of males, numbering approximately twenty in size surrounded VIW1 and pushed him out of the site. VIW1 suffered no visible injuries and did not complain of any aches or pains. VIW1 could not describe which male in particular was the aggressor and rather the twenty males acted together. The group of males then proceeded to enter the office security cabin and stole

a black Motorola London Riverside FM radio walkie talkie and charger. The gates were then padlocked up by the group of males with VIW1 now locked out of the site.

7.24 01/08/2016 Consul Avenue, Rainham. CRIS 5413965/16 – Burglary Non-Dwelling Linked CAD 4614/17AUG16. Exhibit No. RDC24 - Quantum Construction took possession of the venue and employed a security company to secure it. On 12/08/2016 a large group of travellers moved onto the site. From the time the travellers moved onto the site the informant was unable to access the site. The victim had placed his own handmade trailer inside the venue with his own personal tools on. The Travellers were evicted from the site on 17/08/2016. The victim gained access to the venue and saw that his trailer was missing from inside the venue and that the entire floor of the warehouse had been fly tipped. Upon speaking to the victim, he stated that he had received a quote for clearing the venue estimated to be £100,000. Access had been gained to the warehouse by damaging the front door of the venue.

7.25 04/08/2016 7 Beam Reach, Consul Avenue, Rainham. CAD 3046/04AUG16 CRIS 5413170/16. Exhibit No. RDC/25 - Informant stated there were travellers fly tipping in a warehouse at Unit 7 Beam Reach, Consul Avenue. Police attended and PNC and insurance checks revealed the following vehicle on site:

VRM AU55 KNN – Current Keeper after come to notice.

7.26 04/08/2016 MW Construction Ltd. Consul Avenue, Rainham. CRIS 5413226/16. Exhibit No. RDC/26 - Making off without payment. Victim is Pizza Hut delivery driver. He had an order and attended MW Construction Ltd., which is the location of a current travellers' incursion. The gates were unlocked and opened by white male. He took the pizzas and victim asked for payment - suspect asked for an invoice. Victim gave it to him and suspect ran off with the pizzas and the invoice and did not return. He ran to a caravan in distance. There were 4- 5 caravans together. He did not see which caravan he went into. Suspect made no attempt to pay when payment was due. Victim unable to describe suspect.

7.27 07/08/2016 Consul Avenue, Rainham. CAD 6507/07AUG16, Crimint KDRT00322821. Exhibit No. RDC/27 - Informant called police to report vehicles seen entering Consul Avenue with full loads and leaving the site empty. Informant believed that these were the same travellers that had formed an encampment at this location. The

Informant confirmed that they had not seen any fly-tipping take place and that most loads were covered, but informant had seen mattresses on one load. Vehicle registration checks confirmed that vehicles were present on the site that were either owned or insured by the following individuals: William Lawrence, Patrick McDonagh and Karl Barber.

VRM Y201 GAA – Blue Ford Transit. Keeper since [REDACTED]
[REDACTED]

VRM HY65CTO – Grey Vauxhall Vivaro. Keeper since [REDACTED]
[REDACTED]
[REDACTED], London, E15 6LJ.

VRM NG05NVY – Silver Ford Fiesta. Keeper since [REDACTED]
[REDACTED]

7.28 11/08/2016 Unit 22 Allbright Industrial Estate, Ferry Lane, Rainham. CRIS 5413550/16, CAD 9370/11AUG16. Exhibit No. RDC/28 - Call from VIW3 regarding males trying to break into site at location. There were 3 calls in total all of a similar nature Unit 22 Allbright Industrial Estate on Ferry Lane is owned by Rainham Steel, although the unit is currently vacant. On 11/08/2016 at about 2057 hours informant who is a bus driver saw 2 vehicles at location and 5 males using an angle grinder to break into the unit. The vehicles had left prior to police arrival but from Mercury CCTV it appears they were travellers looking to break into the unit to set up a camp as opposed to persons breaking into steal. The suspects have used an angle grinder to cut the lock on the side gate and have then tried to move metal heavy duty blocks from in front of the main gate. It is apparent they have been unable to move them or have been interrupted but they have left. CCTV described 3 vehicles all with caravans and up to 5 suspects breaking in. PNC and insurance checks revealed the following vehicle.

VRM LR53 YXW – No registered keeper, no insurance shown.

7.29 11/08/2016 Beam Reach Business Park, Consul Avenue, Rainham. CRIS 5413580/16. Exhibit No. RDC/29 – Disposing of controlled waste. This is part of an ongoing problem at location whereby local 'travellers' are repeatedly fly tipping at the venue. During the date shown numerous vehicles have attended the location and dumped rubbish at the site, without a licence. Vehicles noted as:

VRM BN04KWK – Blue Ford Fiesta. Keeper since [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

VRM DX54FOT - White Ford Transit Panel Van. [REDACTED]
[REDACTED]

Insurance policy holder details: No details held

VRM WM52DGX – Scrapped.

VRM YE03NPU - Current Keeper after come to notice.

VRM NG08RFF – No Current Keeper since 06/01/2012.

VRM BN04WKW - White Ford Transit Panel Van. Keeper since [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

VRM NG04YGZ – White Ford Transit Tipper. Keeper since [REDACTED]
[REDACTED]

holder details: Insured to the registered keeper.

VRM BN04KWK – Blue Ford Fiesta. Keeper since [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

VRM DX54FOT - White Ford Transit Panel Van. [REDACTED]
[REDACTED]

Insurance policy holder details: No details held

VRM WM52DGX – Scrapped.

VRM YE03NPU - Current Keeper after come to notice.

VRM NG08RFF – No Current Keeper since 06/01/2012.

VRM BN04WKW - White Ford Transit Panel Van. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

VRM NG04YGZ – White Ford Transit Tipper. Keeper since [REDACTED]
[REDACTED]

Insurance policy holder details: Insured to the registered keeper.

7.30 16/08/2016 Consul Avenue, Rainham. CAD 6050/16AUG16. Exhibit No. RDC/30. Site security reporting travellers dumping rubbish at site, vehicles involved VRM Y201GAA and AO55KHN. Vehicle registration checks confirmed that vehicles were present on the site that were either owned or insured by the following individuals:

VRM Y201GAA – Change of keeper since incident date.

VRM AO55KHN – No trace.

7.31 17/08/2016 Unit 7, Beam Reach Business Park, Consul Avenue, Rainham RM13. CRIS 5413774/16. Exhibit No. RDC/31 - Disposing uncontrolled waste. Travellers have made an incursion at the venue and are making multiple trips in and out, bringing general rubbish and dumping it inside the venue. I have shown each VEH with the date, number of trips and other crimes known to CRIS. Several VRMs are duplicated as they were involved on both 13th and 14th August. VRM's noted by Police from CCTV as follows:

VRM BN04WKW – White Ford Transit 350 LWB Panel Van. Keeper since [REDACTED]
[REDACTED]

Insurance policy holders details – Insured to [REDACTED]

VRM DX54FOT – White Ford Transit Panel Van. [REDACTED]

details – No insurance held.

VRM EX55VZV – Change of keeper since coming to notice.

VRM NG04RFF – Change of keeper since coming to notice.

VRM Y201GAA – Change of keeper since coming to notice.

VRM LK16XEL – Change of keeper since coming to notice.

VRM DX54FOT - White Ford Transit Panel Van. [REDACTED]

holder details; no details held.

VRM NG04RFF – No Current Keeper since 06/01/2012.

7.32 28/08/2016 Priory Road, Romford. CAD 4389/28AUG16. Exhibit No. RDC/32. Travellers were reported to have arrived on the green at this location. Two cars and vans, with two horses which they tethered to stakes in the ground and then abandoned on the green when they left. The matter was handed over to the local authority.

7.33 04/09/2016 Queens Hospital, Romford, Old Church Gardens, Romford. CAD 7244/04SEP16. Exhibit No. RDC/33 - Hospital staff reported twenty caravans that have pulled-up in the staff car park at this location, the travellers' stated that they were planning on staying at this location for a couple of days. PNC and insurance checks revealed that the vehicles owned or insured to be driven by the following individuals were on site: Patrick Doran, Joan Conner, Miles Connors, Gerry Connors, John Connors, Lawrence Connors and Lee Cripps. The police served a Section 61 Notice on the site on the 05/09/2018 and the travellers' left the site between the 4th and 7th September.

VRM AV60VKH – White Citroen Dispatch panel van. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

VRM WN12RBZ – Grey Audi A4 saloon. Keeper since [REDACTED]
[REDACTED]
[REDACTED] Insurance policy holder details. [REDACTED]
[REDACTED] Permitted driver
[REDACTED]

VRM DS03LOF – Silver Vauxhall Vectra. [REDACTED]
[REDACTED]
Insurance policy holder details: [REDACTED]
[REDACTED] Permitted driver [REDACTED]
[REDACTED]

- VRM SR16FKL – Current keeper after come to notice.
- VRM KN15WPL - Current keeper after come to notice.
- VRM VN11RYX – Current keeper after come to notice.
- VRM ND09YBX Current keeper after come to notice.
- VRM WR53VFN – Current keeper after come to notice.
- VRM NA08EOS – Current keeper after come to notice.
- VRM MX64XNF – Current keeper after come to notice.
- VRM PK14YUL – Current keeper after come to notice.
- VRM KU57UFD – Current keeper after come to notice.
- VRM WR64NRZ – Current keeper after come to notice.
- VRM SY51UTW – Current keeper after come to notice.

VRM NL60FAU – Current keeper after come to notice.

VRM WP63VDD – Current keeper after come to notice.

VRM LN57XBY Current keeper after come to notice.

VRM GF15HKA Current keeper after come to notice.

VRM MX08HSU White Iveco Daily tipper. Keeper since [REDACTED]

VRM AK59XKF – Current keeper after come to notice.

VRM OU58WNH – Current keeper after come to notice.

VRM NL60XSV – Current keeper after come to notice.

VRM LM15XFU – White Ford Transit Custom panel van. Keeper since [REDACTED]

7.34 06/09/2016 Liliput Road, Romford. CAD 10228/06SEPT16, CRIS 5415048/16. Exhibit No. RDC34 - The same males believed from the travellers' site, were on Liliput Road have just come to my address and have smashed the front door with a metal pole. They have knocked it off its hinges. East Road is a secluded back street, which is dimly lit at this time of night. The victim stated that he was upstairs when he all of a sudden heard a bang from outside; he looked out of his top bedroom window, which is situated at the front of the house. He saw 2 IC1 youths. One was standing just on his driveway and the other approached his front door with what

appeared to be a long metal pole. He then heard loud banging at his front door. Both males then walked away from his front door. He said that this all stemmed from travellers arriving in the area and causing a lot of ASB. He said at one point he called police because a pizza delivery driver was being robbed by a group from the caravans, and they were basically hanging around all night causing noise and damage.

7.35 06/09/2016 East Road, Romford. CAD 9826, 10228, 10047, 10154, 10162, 10277, 10080, 10207/06SEP16 and CAD 7312, 9788/09SEP16 CRIS 5415042/16. Exhibit No. RDC/35 – Criminal Damage. The victims live on the end house of East Road, 50m away from the park on Lilliput Road. There is an ongoing incident with Irish travellers having set up camp inside the park. It is believed that a member of this community has committed this incident. A group of children knocked on the door of No 2 and asked if they could use their toilet. The homeowner replied that they could not. The suspect then proceeded to urinate and poo on the driveway. The human excrement was then put through the letterbox and smeared all over the front door. The exact identity of the male responsible is not known as they were not directly seen committing the crime.

7.36 08/09/2016 Wolseley Road, Romford. CAD 7456/08SEPT16, CRIS 5415160/16. Exhibit No. RDC/36. Reports from a member of the public that members of the travelling community who had set up with their caravans On Lilliput Road had been driving around on mopeds and causing a nuisance. Upon attending the scene police spoke to the victim who stated that four traveller's had come up to his door as he was on a chair sitting outside it and asked him what he was doing, he told them to go away at which point one of them opened his front gate. The victim has then grabbed his walking stick and stated he would hit them if they came inside at which point they retreated and threw stones at him. Victim is partially sighted and a stroke victim so his mobility is very limited. He stated they were four traveller boys and aged around 10-14 years old.

7.37 08/09/2016 Lilliput Road, Romford. CAD 9418/08SEPT16, CRIS 5415170/16. Exhibit No. RDC/37 – Criminal Damage to Motor Vehicle. Police called to Lilliput Road in regards to a disturbance with young travellers and owner of a white ford van VRM LT65UAL. This was stuck at the location partially blocking the entrance to the site due to the keys being taken in an earlier fracas (CRIS 5415168/16 refers). Whilst

at location approximately 10 members of the nearby camp under the age of 10 were present. None would provide their names and even though various older members of the camp were coming and going none would state who the children were or their parents. The young children stated they were annoyed the van was blocking the way. They then began to throw stones quickly and discreetly at the windows while officers were trying to speak with victim to organize recovery. One has then struck the passenger side window smashing it thrown by persons unknown. Victim refused to provide a statement and go to court re the damages.

7.38 05/09/2016 Farringdon Avenue/Neave Crescent, Romford. CAD 8844/05SEP16. Exhibit No. RDC/38 - Police were called by an informant; stating that a number of caravans had set up on a field behind an old people's home on Farringdon Avenue. The informant declined to provide the police with his address, as he did not want them to attend his house.

7.39 04/10/2016 Palms Austin Hotel, Southend Arterial Road, Hornchurch. CADs 9419, 9540, 9658, 9677, 9746, 8006, 8361, 8819, 8827, 9419/04OCT16. Exhibit No. RDC/39. Travellers formed an encampment outside the hotel including approximately 30 caravans, the travellers then accessed the hotel, ejected the staff from the hotel, removing some with physical force and made threats to kill and ransacked the hotel. Callers from the hotel confirmed that the travellers were forcing entry using what was believed to be a chain saw. Staff at the hotel explained to the police that travellers had broken into the hotel car park by bending the electric barrier back to allow vehicles and caravans in. They also explained that the CCTV cameras had been broken by the travellers once they got on site. The staff explained that no one saw who broke the barrier and no one on site had access to the CCTV footage. Victim and the informants explained that they live at the Palm Hotel and have their own living area; their job is to protect the Hotel. Victim has provided a statement and in that explains that there were a number of people knocking on the door and all around the windows of the Hotel, he has then gone to check the front door to make sure it was locked. At this point, the door has been pushed open and the six suspects have pushed through the door, they have then surrounded victim. One of the suspects have then grabbed his right wrist and 3 suspects have pushed both victims out of the door and said to go or they will kill them and then said, "This is our hotel now". Victim has sustained a small and minor cut to

his right arm next to his elbow; additionally he informed Police that he was hit with a sledgehammer, over the calf of his left leg. Victim refused to provide a statement and go to court re the injuries. PNC and insurance checks revealed that the vehicles owned or insured to be driven by the following individuals were on site: Mr Brian Stokes, Robert Eagle.

VRM CP55HKF - Current keeper after come to notice.

VRM YC54GPY - Current keeper after come to notice.

VRM NL57ETU - Current keeper after come to notice.

VRM LN64WWU - Current keeper after come to notice.

VRM LM06EKW - Current keeper after come to notice.

VRMFH07WDT – Keeper since [REDACTED]
[REDACTED] insurance details not available.

VRM EO56KTL - Current keeper after come to notice.

VRM NG02FML – Keeper since [REDACTED]
[REDACTED] insurance details not available.

VRM FY15WWB - Current keeper after come to notice.

VRM LA16CSW- No trace.

VRM 151C9303 – No Trace.

7.40 05/10/2016 The Austin Hotel, Southend Arterial Road, Romford. CAD 4001/05OCT16. Exhibit No. RDC/41 - The Council's enforcement officer issued a Section 77 direction to travellers. Police officers attended to assist with the travellers eviction from the land and ensure that there was no breach of the peace.

7.41 06/10/2016 Palms Hotel, A127, Romford. CAD 1783/06OCT16. Exhibit No. RDC/40 - An informant contacted the Police concerning the ongoing incident at this hotel, which is referred to above in paragraph 7.39 and confirmed that there were 12-14 caravans on site and reported large amounts of fly tipping and litter at the location. Numerous linked calls were received with regards to this incident and the travellers conduct at this site.

7.42 05/11/2016 Near Tilda Ltd, COLDHARBOUR LANE, RAINHAM, ESSEX, RM13 9YQ. CAD 10466/04NOV16 CRIS 5418591/16. Exhibit No. RDC/42 – Criminal Damage. Police were called to attend the location on the 04/11/16 at 2355hrs to a report of persons having removed the padlock of a gate that secures the site. The site is council owned land that has been given over to the RSPB to manage and look after. Although the site office and visitor centre is in Essex the gate, from which the padlock has been removed, is well into Havering. The padlock itself was nowhere to be found - no damage present on the gate. Upon arrival of police at the scene at approximately 1600hrs on the 05/11/16, two vehicles were parked on the land, along with a caravan and bore the hallmarks of a traveller incursion. PNC and insurance checks revealed that the vehicles owned or insured to be driven by the following individuals were on site:

VRM NM07 DKN – Current keeper after come to notice.

VRM CP56 LVD - Current keeper after come to notice.

VRM AU54 LJZ – Scrapped.

7.43 17/11/2016 Near Essex Auto Sales, New Road, Wennington, Rainham, RM13. CAD 3418/18NOV16 CRIS 5419322/16. Exhibit No. RDC43 – Criminal Damage. Victim is a farmer, and tenant of the venue and has been renting the fields for approximately 15 years. He contacted police to state that there had been damage caused to the perimeter fence and that there were travellers on the site. On police arrival, there were 2 caravans on the field, along with two transits and an Astra. Part of the fence around the field was on the floor, which had allowed access to the field for the vehicles. VIW2 states that this was first noticed on the 17/11/2016 at approximately 1340hrs. Police spoke with the occupants of the caravans who were travellers. They stated that they were unaware the land was private and that they were intending to move off the

land. PNC and insurance checks revealed that the vehicles owned or insured to be driven by the following individuals were on site.

VRM NM07DKN – Change of keeper since vehicle coming to notice.

VRM CP56LVD – Change of keeper since vehicle coming to notice.

VRM AU54LJZ – Scrapped on 23.12.2016.

7.44 29/11/2016 Consul Avenue, Rainham. CAD 8402/29NOV16, CRIS 5419974/16. Exhibit No. RDC/44 - Police were called to the location by Victim stating that he was on site security and approximately 30 plus caravans had come onto the Segro site at this location having broken the logs and knocked down the fences to gain access. Damage has been caused to both. Victim stated that he tried to block the entrance with his vehicle and on getting out of his vehicle was threatened by approx. 10-15 males all wearing masks waving knives and baseball bats towards him. Victim said he feared they were going to hurt him and was scared. The males threatened to stab a security dog that was on site. Once the travellers left the site, the CAD confirms that they moved to a site in Dagenham. The site owner arranged for an eviction by bailiffs. PNC and insurance checks revealed that the vehicles owned or insured to be driven by the following individuals were on site: Patrick Stokes and Pat Corby.

VRM EO56 KTL – Current keeper after come to notice.

VRM LN64 WWU - Current keeper after come to notice.

VRM ND55 EXU – Current keeper after come to notice.

VRM EO56 KTL – A blue Ford Transit. [REDACTED]
[REDACTED]

VRM NG02 FMY – Scrapped.

VRM SE65 AZF - Current keeper after come to notice.

SN15 YFK - Current keeper after come to notice.

VRM ST61 UXC – A white Ford Transit. [REDACTED]
[REDACTED]

- 7.45** 22/01/2017 Stanwyck Gardens, Romford. CAD 3052/22JAN17. Exhibit No. RDC/45 - Travellers had formed an encampment behind the informant's garden and were trying to tap into local residents sewer pipes. The informant explained to the Police that the travellers were knocking on doors to see who is in with a view to tapping into the pipes when people are out. The informant had been advised by Essex Water to contact Police to report criminal damage. The informant was concerned that they would target her property as they had seen her leave her property.
- 7.46** 28/02/2017 White Post Farm, Ockendon Road, Upminster RM14. CAD 1225/28FEB17 CRIS 5403363/17. Exhibit No. RDC/48 – Burglary non-dwelling. Police were called by informant stating that several units at the location had been broken into and a safe had been found in a field. There were three sites that had been broken into. One ground floor office, one large red container and then a raised office. Two victims believe it could be local travellers from OCKENDON as apparently they have done it before. There were tire marks on the back field leading away from the site apparently towards the travellers' site. Potentially a scrambler bike was used.
- 7.47** 11/04/2017 Lower Bedford Road/Risebridge Chase, Romford. CAD 1529, 1727, 1873, 1998/11APR17 and CRIS 5405876/17. Exhibit No. RDC/46 and RDC/47 - An informant contacted the police and explained that they were undertaking roadworks for the gas board and local travellers were continually moving the barriers and throwing things at the informant and that one of the travellers from a nearby travellers site threatened the informant and his son with a screwdriver. The caller explained that there was a large hole in the road and that by keep moving the barrier the travellers were causing a danger to the public.
- 7.48** 21/05/2017 The Bear Public House, Noak Hill Road J/W Tees Drive and Wincanton Road, Harold Hill. CAD 4410, 7846 and 7770/21MAY17 CRIS 5408234/17. Exhibit No. RDC/50 - At the junction of Noak Hill Road, Tees Drive and Wincanton Road, 2 x 7 year old children were seen to throw a broom head at the windscreen of a passing vehicle causing it to smash. They then run into the traveller encampment nearby. The other reports on the same date/time refer to 2 x children firing an air rifle at a bus and in a garden.

7.49 21/05/2019 Barnstaple Road, Romford. CAD 3905, 6622 and 4928/21MAR19 CRIS 5408286/17. Exhibit No. RDC/51 - An informant contacted the police and explained that a male traveller, apparent age 14 to 15, from an unauthorised travellers' encampment at their local park, approached her daughter (14 years old) and attempted to sexually assault her, by pulling her towards him by the waist. A friend has gone to help and the Victim has managed to get out of the boys grip and run towards some adults whereby the Victim then heard the boy ask if she would like to have sex with him. Victim's Sister made a further call to Police asking for an ETA and stated that her sister was grabbed by the waist by the suspect where he attempted to touch her genitals. Further reports that the same group of traveller males had attempted to dry hump other female school children accessing the park on their way back from school and other boys looking under grown women's skirts. The informant explained that her daughter was frightened that this would happen again and that the informant was taking her daughter to and from school as a result of this incident and was concerned it may happen to other children.

7.50 18/06/2017 Whitchurch Road, Romford. CRIS 5410043/17. Exhibit No. RDC/53 - Depositing controlled waste, fly tipping - Informant states there is a traveller incursion at the park and they have been dumping rubbish at the site. In excess of 5 caravans present. Travellers fly tipping at location.

7.51 19/06/2017 WINCANTON ROAD, HAROLD HILL. CAD 5759/19JUN19 CRIMINT KDRT00331619. Exhibit No. RDC/49 - An informant called police due to concerns over caravans on the green near to his house. Officers spoke with a member of the travelling community, who informed officers they are planning to stay for 4-5 days whilst waiting for a member of their community to give birth. Officers were informed that once the baby is born the family would be moving on towards Birmingham. The majority of the vehicle registration numbers were from Ireland and it was not possible to identify the registered keepers of the vehicle.

7.52 19/06/2017 Wincanton Road, Harold Hill, Romford. CAD 5759/19JUN17 Crimint KDRT00331619. Exhibit No. RDC/52 - An informant contacted the police and confirmed that ten caravans had pulled-up on the green. The informant explained that this was an ongoing problem and that the travellers had been on the site last week and there was still rubbish on the site from the previous week. The Police spoke to the

travellers who stated they were planning on staying there for four to five days while waiting for a member of their community to give birth. Checks revealed that the vehicles owned or insured to be driven by the following individuals were on site: John Walsh. No further calls to location so assume left of their own accord.

VRM 132LS265 – White caravan, model not known. Irish plate, no trace PNC.

VRM 12D1249 – White caravan, model not known. Irish plate, no trace PNC.

VRM 151MO2323 – White caravan, model not known. Irish plate, no trace PNC.

VRM 10G4379 – White caravan, model not known. Irish plate, no trace PNC.

VRM 07LK1161 – White caravan, model not known. Irish plate, no trace PNC.

VRM 10G19965 – White caravan, model shown as TBBERT. Irish plate, no trace PNC.

VRM 97KK1065 - White Toyota, model not recorded [REDACTED] Irish plate, no trace PNC.

VRM 07KK1934 – Silver Kia Sportage. Irish plate, no trace PNC.

VRM SK17MIV – Volkswagen, model not recorded. No trace PNC.

7.53 Whitchurch Road, Romford, RM3 9EX. CRIS 5410043/17. Exhibit No. RDC/53 - Depositing Controlled Waste Crime, Fly Tipping. Informant states there is a traveller incursion at the park and they have been dumping rubbish at the site. In excess of 5 caravans present. Travellers fly tipping at location.

7.54 22/06/2017 Orange Tree Hill, Havering-Atte-Bower Cricket Club, Romford. CAD 7711/22JUN17, CAD/2019, 2671, and 3772/23JUN17. Exhibit No. RDC/54 - Travellers moved onto the cricket ground at this location and enforcement agent called the Police for assistance in removing travellers who have refused to leave the site. It was noted that there were forty travellers on site with eight caravans and twelve cars

and children. Section 61 Criminal Justice and Public Order Act 1994 issued by the police to ensure the travellers left the site. A further call was made with the informant stating that gypsies were trying to break into the field with approximately fifty caravans and that they were blocking the road. These were monitored by Parks Police and were apparently ten caravans.

7.55 18/01/2018 Tesco Extra Car Park, Bryant Avenue, Romford. CAD 7134/18JAN18. Exhibit No. RDC/56 - An informant contacted the police and confirmed travellers had arrived on the site and were setting-up and encampment in the car park. The informant confirmed that they had placed extra security guards on the access to the car park.

7.56 08/03/2018 Tesco Extra, Gallows Corner, Romford. CAD 4122/08MAR18. Exhibit No. RDC/57 - An informant contacted the police and confirmed that there were about 8 caravans in the car park. They were reported to remain on the car park for 40 minutes before moving off, believed towards the A12.

7.57 09/03/2018 Pompadours, Hildene Avenue, Harold Hill. CAD 1003/09MAR19 and CAD 3097/10MAR18 and CAD 3744, 4719, 5223/12MAR18. Exhibit No. RDC/65 - Reports were received that 'a good 10' caravans had parked up outside of the Pompadours Pub and had broken into the location. By 12/03/2018, reports were being received that the travellers were causing a nuisance and 'screaming abuse at people and chatting up young teenage girls. An informant reported that there was littering and rubbish being left 'all over the place' and generally making matters uncomfortable for residents. Once informant reported the travellers throwing stones at people nearby. The owners reported that the travellers had broken in causing criminal damage by breaking down a fence to gain entry.

7.58 13/03/2018 Tesco Extra, Bridge Road, Rainham. CAD 4101/13MAR18. Exhibit No. RDC/58. An informant contacted the police and confirmed that 7-8 caravans are trying to gain access to the site. The informant explained that they had a barrier that the travellers were trying to remove and they were reported to be "fiddling with the padlock as we speak". Informant complained, "they are going mad now nearly knocked me down in the road they are aggressive and violent." The informant confirmed that the travellers had then taken-up the barrier and their caravans were now

on the site. Vehicle registration checks confirmed that the vehicles were owned and/or insured by the following individuals: Lawrence Connors, Ann Connors, Roderick Eller, Christopher Freeman, Falex Doran, Michel Thomas, John Howell, John Connors Jnr, Priscilla Garside, Andrew Cash, Patrick Connors,

VRM NL07WDK – White Ford Transit Tipper. [REDACTED]
[REDACTED]

VRM AK59XFK – Black Ford Galaxy. [REDACTED]
[REDACTED]

VRM LD06NYZ – Grey Fiat Doblo. [REDACTED]
[REDACTED]

VRM NA60EKN – White Ford Transit Tipper. [REDACTED]
[REDACTED]

VRM NL14BUU – White Ford Transit Tipper. Keeper not known.

VRM X5WAS – Silver BMW X5. [REDACTED]
[REDACTED]

VRM NJ61 GVW – White Ford Transit Tipper. Keeper not known.

VRM EK13 LMY – White Ford Transit panel van. Keeper not known.

VRM MD57XAO – Silver Mercedes ML320. [REDACTED]
[REDACTED]

VRM GF56KXB – Green BMW X3. [REDACTED]
[REDACTED]

VRM PK56KFP – Black Kia Sorrento. [REDACTED]
[REDACTED]

VRM SN67TWM – Grey Ford Ranger pickup. [REDACTED]
[REDACTED]

VRM YS55KNY – White Renault Master panel van. [REDACTED]

VRM KN66XAF – Silver Volkswagen Golf. [REDACTED]

VRM FN66ONO – Blue Ford Kuga. Keeper [REDACTED]

VEM HF67WPK – White Ford Transit panel van. Keeper since [REDACTED]

7.59 13/03/2018 Wymark Close, Rainham. CAD 5367/13MAR18. Exhibit No. RDC/59 - An informant reported to the police that travellers were forcing their way onto the location and that they had to break a lock off to gain entry. Police attended location in the early hours of 14 March 2018 and confirmed that there were 22 vehicles and approximately the same amount of caravans on the playing field. This was reported to be linked to another encampment at Cherry Tree Lane that had been reported at the same time and included 30-40 caravans. The travellers informed the police that they would not move from the site unless ordered to do so. It was eventually decided that the police would serve a section 61 notice and direct the travellers to leave. The following vehicle VRM's were noted as on site: NY14 FPC, BK67 ZPP, FN66 DNO, AK08 GKF, YS55 KNY, SE64 SVA, KN66 XAF, DN55 FKU, YR63 WCF, NL14 BUU, MA64 TZY, GF56 KXB, KN15 WPL, MD57 XAO, NJ61 GVW, LM59 NXL, KK08 FFZ, X5 WAS, HF67 XUJ, HJ66 OYH.

7.60 22/03/2018 Verve Apartments, 24-30 Western Road, Romford. Crimint KDRT00339327 and KDRT00339363. Exhibit No. RDC/69. Police attended a travellers encampment at Verve Apartments. Two IC1 male spoke to officers and directed them toward a LASPO notice on the fence. The occupiers said they moved in 2 days ago and planned to leave on 24/03/2018. They claimed the gate was open and drove in and it is waste land – the gate was padlocked and surrounded by a 7 foot fence. They stated they have 7 vehicles and 6 caravans and around 12 adults and 10 children and 6 dogs. No welfare concerns were reported. Reports were made regarding welfare of dogs on site by the wildlife officer had no concerns. The main concerns for the site were disruption to local residents through noise and fly tipping. The occupier agreed

to move the dogs and generators into the centre of the compound to reduce the noise complaint. Reports confirm private bailiffs had been employed to arrange eviction.

7.61 23/03/2018 Blewits Cottages, New Road, Rainham. Crimint KDRT00339369. Exhibit no. RDC/63 Three trucks and six trailers were reported as being parked in the vicinity. Travellers had locked themselves in the property by putting a padlock on the barrier and they seemed to get annoyed at the fact that officers had entered where they set up their trailer homes. When officers asked what they were doing they said they had been at the location for 7/8 hours and would leave on the following Monday morning and no other vehicles would join them.

7.62 29/03/2018 Manor Way, Rainham. Crimint KDRT00339520. Exhibit No. RDC/64. Travellers had set up at the end of an industrial area in Manor Way. There were seven caravans at the time officers visited the site and no one at the site engaged with officers. A considerable amount of rubbish could be seen to the rear of the caravans. Local businesses reported the encampment having been here since 24/03/2018.

7.63 08/04/2018 – Cockney Gent public house, Petersfield Avenue, Romford. CR 5405544/18. Exhibit No. RDC/66 - Travellers were believed to have forced entry to the front of the property, removing lock and causing damage and destruction within the pub. A number of items were reported stolen and a large quantity of rubbish and debris had been fly tipped in the area. It appears that a stereo had been cut from the wiring system and removed. Further investigations along the hallway revealed a strong smell of urine and seven separate human excrement piles, along with toilet tissue scattered everywhere. The officer also reported numerous empty beer bottles scattered everywhere along with wood, bottles, glass and paper. An ice machine appeared to have been removed from the bar. In the residential area above the police noted smoked cigarette butts, ashtrays, 12 needles and syringes. Drawers were broken throughout the rooms. Within all the rooms there was a large amount of rubbish, which the owner confirmed, was not present prior to the travellers attending on 27/03/2018. The owners reports needing 6 skips to clear the rubbish and a cost of £5,000.00.

7.64 09/04/2018 Rainham Trading Estate, New Road, Rainham. CAD 2855, 5684/11APR18 and Crimint KDRT00339745. Exhibit No. RDC/67 - Officers attended

the above location where the informant stated that a group of caravans and vehicles had parked up at his business and he was unable to gain access. There were 6 caravans and 3-4 vehicles and it was agreed they would leave by 1800hrs on Wednesday. However the informant phoned later to say this did not happen. He confirmed the lock had been broken to grant access along with breaking the roller shutters. An s61 notice was issued but refused by the travellers.

7.65 31/05/2018 Tesco, 300 Hornchurch Road, Hornchurch, RM11 1PY. CRIS 5408721/18. Exhibit No. RDC/68 - Travellers in approximately 6 caravans attended and one of the travellers is reported to have assaulted a customer, who had left by the time police arrived. The customer, a female, was with her son who is between 5-10 years old and a young boy from the encampment ran up to the victim's son and started tugging at his arm. This was all reported by security. Police later spoke to victim who confirm it was two boys pulling at her son and she tried to find their mother. She did not want to proceed with this case.

7.66 01/09/2018 The Palms Hotel, Southend Arterial Road, Hornchurch. CAD 6748, 6696/01SEP18 and CAD 3072, 3170, 6706/02SEP18 and CAD 2127, 2153, 2615, 2980, 3633/03SEP18 and CAD 1870, 6085/04SEP18. Exhibit No. RDC/60 - An informant contacted the police and confirmed that "loads of travellers are arriving at the location, they have broken the barrier to our car park to gain entry. The travellers are blocking the road and the car park area; some of the travellers are running around the car park. Approximately 20 vehicles were in the car park by the time the informant called and the rest were in the road causing an obstruction. Another informant contacted the police and claimed that there was "loads of trouble" at the location and that the travellers were riding around on quad bikes and nearly knocking over children. The young males on bikes surrounded a police vehicle that attended to prevent them following the quad bikes onto the site and threw bricks and bottles at the police vehicle causing them to have to reverse out of the site. Reports were received of damage to a JCB digger on a neighbouring site and was directly linked to this encampment. Travellers were also reported to be throwing bottles into local residents gardens and disturbing residents by riding around all night on scrambler bikes. Further calls were received from local residents about the all night disturbance caused by the travellers driving up and down the road.

7.67 02/09/2018 Southend Arterial Road, Ardleigh Garden. CAD 7680, 7672, 7421, 5977/02SEP18 and CAD 3033, 4224, 4631/03SEP18 and CAD 4604/04SEP18. Exhibit No. RDC/61. Informant, a local resident, contacted the police concerning a travellers encampment in the grounds of an old palm hotel at this location claiming the problems being caused by this encampment were getting worse and that they had to keep all their windows closed due to the smell being caused by the travellers burning rubber. A further caller contacted the police and complained that he had been listening to quad bikes being used by the travellers for 12 hours; the operator reported that they could hear the quad bikes whilst the caller was on the call. Another informant called and reported travellers nearly knocked over some children on their mopeds. They kept riding and now eventually did knock some children over and the father of the children looks like he was going to "lump them". The informant was not sure if the children were ok.

7.68 04/09/2018 Hall Lane, north side of A127. CAD 7411, 7183, 6923, 6839/04SEP18 and CRIS 5414048/18 and Crimint JIRT00393861, KDRT00343876. Exhibit No. RDC/62. Informant called Police stating that travellers had encamped in field off the A127 having arrived here from the Palms Hotel where they had been encamping previously. The informant reported 20 travellers' caravans breaking onto the fields as the location. The informant explained that he attempted to block the caravans from breaking onto the site by parking his car in front of them. However, some make travellers told him to move it or they would set fire to it. Police reports state that on Saturday 1st September 2018 Police were following a convoy of caravans that had been served notice to leave the Little Heath grass area outside of the New City College, Ilford. The vehicles were driven to The Hotel and Conference Centre (also known as Palms Hotel & Austin Hotel) along the A127, towards Southend. EA801L were approximately 15 cars behind the convoy when it reached the Centre but had no view of the entrance. When officers reached the entrance, they could see the barrier that was closed had been prised open and bent backwards to allow cars to enter. There was also a gate on the side of the property that had a lock on, which had been broken off to gain access into the back of the land. This land is privately owned and the security officer made the manager aware of this incident. They stated that they would be seeking a court order if they had not by the following day. Report for criminal damage completed. Further Crimint stated that the Unauthorised Encampment recorded on JIRT00393861

stated that just prior to being served the S61 notice; they vacated the site and moved half a mile away to Hall Lane. It should be noted that officers had stones thrown at them when serving the new Section 61 notice by occupants of this encampment.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed:  EA1046

Inspector Richard Carter EA1046

Date: 05/08/2019

Claimant: LB of Havering
First
Exhibits:
Date:08.05.18

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

Claim Number: _____

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND XX DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF JIM RATCLIFFE

1. My name is Jim Ratcliffe and I am currently employed as an Enforcement Officer within the Street Scene Enforcement section of the London Borough of Havering based at Mercury House Mercury Gardens Romford RM1 3SL. My duties include the investigation of Environmental and Highways offences. I act as witness in these proceedings as a result of complaints received.

Unit 3, New Road, Rainham

2. On Monday 9th April 2018 I was included in an e-mail from Debbie Moore who is employed by London Riverside Bid that a group of Travellers who had previously occupied land known as Unit 1 New road Rainham had moved over the weekend and had now occupied land at Unit 3 New road Rainham which is approximately half a mile from Unit

1. The e-mail went on to say that vehicles occupying the site had already started fly tipping on the land and were covering up their number plates in an attempt to avoid identification. I attach a copy of the e-mail and photographs taken of the occupation as my exhibit JR/Unit3/001

3. On Monday 9th April 2018 I arranged for a land search to be completed which gave me details of (the landowners for me to make further enquiries. I attach the result of the land search as my exhibit JR/Unit3/002.

4. On Tuesday 10th April 2018 I received a telephone call from Mr Prashant Patel who confirmed to me that he was one of the Landowners and the Incursion had taken place on Saturday 8th April. Mr Patel agreed to send to me an e-mail giving me some detail on what had happened.

5. On Tuesday 10th April at 17:38 I received an e-mail from Mr Patel in which he describes what had occurred whilst the incursion was taking place. Mr Patel describes that his agent had been on site and that the Travellers had used Grinders to cut down fencing to force entry onto the site and had subsequently changed the locks to prevent any further access on to the site. Mr Patel states that he requested an immediate Police presence and that he had asked Police to issue a Section 61 notice to request the travellers to leave but that they had been unable to do so. He states that he is now unable to gain access to his land and the office situated within. Attach a copy of this e-mail as my exhibit JR/Unit3/003

6. On Friday 13th April 2018 I e-mailed Mr Patel to let him know that I was preparing a legal file to put before the High court for an injunction on Traveller Incursions. On Saturday 14th April 2018 Mr Patel responded to me to say that Police had arrived on site on 11th April 2018 at 20:30 to serve a Section 61 notice and that they would return on 13th April 2018 at 20:30 to enforce it. Mr Patel describes that 22:00 hours on 13th April 2018 two Police Officers arrived to remove the Travellers. He states that the Travellers "were laughing at the Police Officers and at us as well". Mr Patel states that at 09:50 On 14th April 2018 he was still waiting for the Police to arrive. I attach this e-mail as my exhibit

JR/Unit3/004.

7. On Friday 20th April 2019 I visited the site known as Unit 3 and took a series of photos of the significant amount of refuse which had been left on site when the Travellers had departed. I attach these as my exhibits JR/Unit3/005/006/007/008.

Grenfell Park

8. On Monday 20th November 2017 I was advised by Stephen Edwards who is a Constable in the London Borough of Havering Parks constabulary, that a fly tipping incident had occurred in Grenfell Park over the weekend of 18th and 19th November 2017.
9. A number of fly tips had taken place which he had witnessed and that he had evidence of a vehicle NL06GXB taking part in the fly tip.
10. He further advised me that this vehicle was currently parked in a Car Park at Tesco Roneo Corner which is very close to Grenfell Park.
11. As I had received information from PC Edwards that he had evidence that NL06GXB had been involved in a fly tipping incident I requested our contractor Redcorn Ltd. to remove the vehicle from the Tesco Car Park and to store it at their depot whilst further investigations were made.
12. The vehicle was seized under Section 5 Control of Pollution (amendment) Act 1989. I published this on the Havering website and at the council Town Hall and I attach the notice as my exhibit JR/GP/001.
13. I also completed an on-line check with the London Borough of Havering connection to the DVLA and this showed that the registered keeper of NL06GXB on 20th November 2017 was a [REDACTED]
[REDACTED]

14. On Tuesday 21st November I was contacted by a Mr Khan who stated he was representing Mr Lawrence and stated that he would like to attend any tape recorded interview in regard to our investigations into Mr Lawrence.
15. Later the same day I was contacted by Mr Lawrence who stated he would like his vehicle returned to him. I advised him that the vehicle had been seized as part of our investigations and would not be returned whilst investigations are on-going.
16. I exhibit an email I sent on 23rd November to my Manager from Mr Khan, which also summarizes my telephone conversation with Mr Lawrence as my exhibit JR/GP/002.
17. Mr Lawrence failed to attend our offices for an interview on 6th December and I have had no further contact from Mr Lawrence on his vehicle.
18. On 28th December 2017 I wrote to Mr Lawrence at the address given by DVLA to say that if he did not make contact with me by January 2018 his vehicle would be destroyed.
19. I attach my letter to Mr Lawrence as my exhibit JR/GP/003.
20. On Monday 5th March I was sent an e-mail from Redcorn Ltd who are our vehicle removal contractors as NL06GXB was still being stored by them and incurring storage.
21. I have authorised the destruction of the vehicle.

Berwick Pond Woods

22. On Friday 20th April 2018 I was informed by an e-mail that a Traveller Incursion had taken place on land known as Berwick Pond Woods which are situated in Berwick Pond road within the London Borough of Havering. Berwick Pond Woods is a wide open space used by the

community in and around Havering as a walking and recreational area for themselves and their dogs. I attach a copy of the e-mail as my exhibit JRIBW/001.

23. On Monday 23rd April I visited the site which had now been vacated. I took a series of photographs of the land which I attach as my exhibits JR/BW/002, JR/BW/003, JR/BW/004, JR/BW/005, JR/BW/006, JR/BW/007, JR/BW/008, JR/BW/009.
24. I made a number of enquires with the Woodland Trust and the Forestry Commission in an attempt to find out who was the owner of the land. On Thursday 26th April I made contact with a company called Tarmac UK and on Friday 27th April I received an e-mail from Simon Treacy of Tarmac. I subsequently spoke to Simon Treacy by Telephone and he confirmed that Tarmac UK were the owners of the land and had been involved in the eviction of the Travellers by Bailiffs soon after the incursion. Simon agreed to supply with a Statement describing what had taken place during the incursion and the disruption it had caused to the local community.
25. I attach two maps from the London borough of Havering Digital Mapping system. My exhibit JR/BW/010 shows the location of Berwick Wood and my exhibit JR/BW/011 is an overlay from the mapping system giving a view of the topography of the land.

Angel Way Car Park & adjacent land Decathlon Site

26. On Monday 18th July 2016 I went to the London Borough of Having Council owned Car Park situated at Angel Way Romford and adjacent to a vacant site known as the "Decathlon" site. I was aware that Travellers had occupied the site and that significant amounts of waste were being Imported into the site. I took photographs of the site from the Car Park which confirmed significant amounts of waste were being deposited and I observed a white Ford Transit vehicle depositing waste. I attach these photographs as my exhibit JR/001 and JR/002.

27. On Tuesday 19th July I visited the London Borough of Havering CCTV Control Room to ask them if they had any CCTV Cameras which were located adjacent to the "Decathlon", site.
28. I spoke to Gary Berkeley the CCTV technician in the control Room who informed me that there was a camera adjacent to the "Decathlon" site. This camera was part of the established CCTV camera network operated by London Borough of Havering and there is signage in and around the Town Centre advising that CCTV is present.
29. I asked Gary to forward to me any footage he may already have or any new footage that shows vehicles and their occupants depositing waste on the site.
30. Later that day I received an e-mail from Gary Berkeley confirming that he had downloaded five incidents of waste being deposited at the location and that he had also written statements confirming this. I confirmed to Gary that I would require these statements and downloads under Section 115 of the Crime and Disorder Act 1998 and they were required in the pursuit of a criminal investigation under the Environmental Protection Act 1990. I attach a copy of the e-mail confirming this as my exhibit JR/003.
31. On Tuesday 19th July, Having received the footage and statements from Gary Berkeley, I completed an on line check via the London Borough of Havering direct connection to the DVLA database on each of the vehicles described in Gary's statement as follows;

NC03MPY. The Registered Keeper was shown as, [REDACTED]
[REDACTED] A Ford Transit
White.

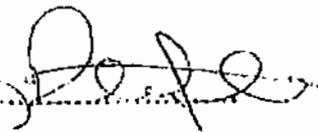
EX54EJJ. The registered keeper was shown as, [REDACTED]
[REDACTED]

PO54 UEB. The registered keeper was shown as, [REDACTED]

[REDACTED] A Ford Transit White.

[REDACTED] A Ford Transit Silver.

I believe that the facts stated in this witness statement are true.

Signed: 

Dated: 8th May 2018

Claimant LB of Havering
B Amerige
First
Exhibits: BA1-15
Date: 29.10.2018

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

Claim Number: _____

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF BARRY AMERIGE

I, Barry Amerige, currently employed as an Enforcement Officer within the Street Scene Enforcement section of the London Borough of Havering based at River Chambers, 36 High Street, Romford, RM1 1HR WILL SAY AS FOLLOWS: -

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above defendants. The facts stated in this statement are within my own knowledge

unless otherwise stated. Those facts outside of my own direct knowledge are true to the best of my knowledge and belief.

2. I have been employed by the London Borough of Havering within this post for over 3 years, previous to this I held the position of Criminal Law Enforcement Senior Officer within the London Borough of Newham from 2001 to 2014.
3. My duties include the investigation of Environmental and Highways offences and to undertake tasked and proactive patrol duties, the primary role of carrying out focused and high levels of enforcement and investigation activities across the borough, addressing issues of crime and disorder, anti-social behavior, nuisance, environmental issues, this also includes responding to and dealing with any reports of unauthorized encampments within the borough.
4. I list below the unauthorized encampments that I have had caused to respond to during the course of my duties:

Front Lane Car Park – 7 March 2018 to 13th March 2018.

5. On the 13th March 2018 I was contacted by e-mail by Mr Kenny Wilks the London Borough of Havering's Enforcement Group Manager. This was to advise that residents, who were local to an unauthorized encampment at Front Lane Car Park Upminster Essex RM14, wished to provide information supporting any action the Local Authority wished to take as a result of the encampment.
6. Front Lane Car Park is a parking facility managed upon land

belonging to the London Borough of Havering for the purpose of vehicle parking. This is upon two co-joining sites separated by a Transport for London Red Bus access to terminus standing. This road access is non adopted carriageway and maintained at the expense of the public purse.

7. At 13.00hrs on Thursday 22nd March 2018 I visited the local residents who conveyed to me what they saw and how this impacted upon them and their family.
8. The informants recounted how the incursion in Front Lane Car Park was first noted on or before the 7th March 2018. 3 caravans were noted with two vehicles. The vehicles were described as a red van and a white truck
9. The noise of the incursion has impacted upon sleep for all the family. This has also impacted upon the ability to study or watch television. One of the informants is currently in ill health having suffered two strokes and subject to medication and rehabilitation which has been compromised by this incursion within Front Lane Car Park.
10. The noise has taken the form of a mechanical fueled electrical generator which was described as being clearly audible overnight. The generator described was witnessed by myself during my visit to the informants and audible at times over the early afternoon vehicular traffic, which was passing by their dwelling.
11. It was claimed by the informants that noise was witnessed of raised voices and laughter emanating from the

encampment together with loud amplified music. The London Borough of Havering was claimed to have been called by the family over the course of the incursion to respond to the noise nuisance. These calls were not monitored.

12. Concerns were voiced by the informants of shouting and cars beeping horns from passing traffic directed at the encampment.
13. The informants informed me that there is an historic rodent problem in the immediate area, with railways being within close proximity. The residents were concerned about waste generation and illegal commercial waste disposal, often associated with unauthorized encampments, which they feared would exacerbate this problem.
14. Concerns were also expressed at the environmental impact of such incursions and the impact of the visual amenity of the area by the presence of the same.
15. Fear of crime was also expressed as a result of this encampment both a fear of physical harm if challenged and goods and items being removed from outside of properties and burglary.
16. Both informants are part of the same address and family unit. The informant's identities are known to me however through fear of intimidation or reprisal wished this not to be disclosed.

Lessa Open Space – 13 March 2018 to 15 March 2018

17. On Thursday 15th March 2018 I visited the site of a Traveler Incursion at Lessa Open space Wymark Close RM13 8SW. This is a public open space owned and maintained by the London Borough of Havering.
18. This incursion was between Tuesday the 13th and Thursday 15th March 2018. The incursion was in the process of dispersal with vehicles and trailing caravans leaving Wymark Close RM13 from Lessa Open space as I arrived at the location at approximately 11.56hrs.
19. There was an accumulation of waste in several satellite piles throughout the area. This consisted of vehicle parts, domestic waste, gas bottles and other general waste items.
20. I saw damage to grassed areas caused by caravans and towing vehicles within areas of witnessed encampment. This I described as deep channels of tyre tracks imbedded into the turf causing ruts across the turfed area.
21. Photographs were taken at the location which I present as photographic collage of which is produced and shown to me as [Exhibit BA01]

Unit 1, Rainham, Essex – 31 March 2018

22. On the 31st March 2018 I was contacted by email by Stephen Edwards, a Parks Constable within the London Borough of Havering. This was to advise that a resident, who was local to an unauthorized encampment at a site within Unit 1 of an Industrial Park off New Road, Rainham Essex, wished to

provide information supporting any action the Local Authority wished to take as a result of such an incursion..

23. At 12.45hrs on Tuesday 3rd April 2018 I visited the location and took photographs which are produced and shown to me as **[Exhibit BA02]**.

24. On Thursday 5th April 2018 I contacted a local resident who conveyed to me what they saw and how this impacted upon them and their family. The informant recounted how the incursion at the Industrial Park off New Road, Rainham Essex was first noted sometime the previous week.

25. Multiple caravans were noted with multiple vehicles. Over the course of the incursion it was recounted to me that vehicle and caravan and vehicle numbers decreased as the space occupied was beginning to fill up with waste.

26. The noise of the incursion has impacted upon sleep for all the family. This has also impacted upon the ability to study and watch television without the need for increased volume.

27. The noise has taken the form of a mechanically fueled electrical generator which was described as being clearly audible when traffic from the A13 dies down overnight. Noise was also audible from dogs kept on the incursion site.

28. The resident also recounted seeing dogs coming from the site onto New Road via a hole in the fencing and attacking pedestrians and threatening barking.

29. The informants recounted that there is an historic rodent and

urban fox problem in the immediate area. The informant had concerns that waste generation and illegal commercial waste disposal, which is often associated with unauthorized encampments, would exacerbate this problem. Concerns were also expressed at the environmental impact of such incursions and the impact of the visual amenity of the area by the presence of the same. Fear of crime was also expressed as a result of this encampment. The informant's identity is known however through fear of intimidation or reprisal wished this not to be disclosed.

The Cockney Gent Public House – 31 March 2018

30. On the 31st March 2018 I was contacted by email by Stephen Edwards, a Parks Constable within the London Borough of Havering.
31. This was to advise that residents, who were local to an unauthorised incursion at a site within the Cockney Gent Public House in Petersfield Road Harold Hill, wished to provide information supporting any action the Local Authority wished to take as a result of such an incursion.
32. The Cockney Gent Public House in Petersfield Road Harold Hill is a vacant plot and is private land. At 12.45hrs on Tuesday 3rd April 2018 I contacted a local resident who conveyed to me what they saw and how this impacted upon them and their family.
33. The informant recounted how the incursion at the Cockney Gent Public House in Petersfield Road Harold Hill was first

noted sometime the previous week. 2 caravans were noted with three vehicles. The vehicles were described as a Blue Ford Transit, an Orange Ford Transit, and a Silver car. The noise of the incursion has impacted upon sleep for all the family. This has also impacted upon the ability to study.

34. The noise has taken the form of a mechanically fueled electrical generator which was described as being clearly audible overnight.
35. The informants recounted that there is an historic rodent problem in the immediate area. The informant had concerns that waste generation and illegal commercial waste disposal, which is often associated with unauthorized encampments, would exacerbate this problem
36. I took photographs at the incursion and exhibit these within a photo collage produced and shown to me as **[Exhibit BA03]**.
37. Concerns were also expressed at the environmental impact of such incursions and the impact of the visual amenity of the area by the presence of the same. Fear of crime was also expressed as a result of this encampment.
38. The informant's identity is known however through fear of intimidation or reprisal wished this not to be disclosed.

The Pompadours Public House – 4 May 2018

39. On Friday 4th May 2018 I attended the site of the former Public House known as the Pompadours at Hilldene Avenue Romford

RM3 8DJ. This is a location within the London Borough of Havering. This land abuts the public highway and is private land.

40. Accompanying me was Mr Jim Ratcliffe, a Senior Street Scene Enforcement Officer. Mr Ratcliffe was driving a Blue Ford Focus unmarked pool vehicle. Mr Ratcliffe dropped me at the location and remained in the vehicle. I immediately observed an unauthorized encampment had formed.

41. I took 1 photograph at the peripheries of the incursion which is produced and shown to me as **[Exhibit BA04]**.

42. I saw the following vehicles parked outside the frontage to the main building.

- a. A white Ford Transit with a blue rear body bearing the registration 06DL7918.
- b. A white Ford Transit with a blue rear body bearing the registration 06DL7918.
- c. A white Volvo bearing the registration YC11BWB.
- d. A blue Ford Focus, I was unable to view the registration of this vehicle.
- e. A blue Nissan Almera bearing the registration 05D647.
- f. A white Toyota bearing the registration VHZ3449.

43. I saw the following caravans parked outside the frontage to the main building.

- a. A white LEXON CARAVAN bearing the registration W315WJN.
- b. A white STIRLING CARAVAN bearing the registration 05G2011.
- c. A white EDDIS AVANTE CARAVAN. This caravan was

displaying no towing vehicle identification.

d. A white SWIFT CARAVAN. This caravan was displaying no towing vehicle identification.

e. A white BELVOIR CARAVAN. This caravan was displaying no towing vehicle identification.

44. Outside the frontage to the main building I saw fly tipping I would describe as predominantly light domestic in content. I also saw vehicle parts and a around 5 to 6 wheels with tyres attached. At the rear of the main building, I saw a further quantity of fly tipped waste. I would describe the waste as consistent with house clearance and construction waste. I estimate this to be in the region of 4 to 5 large skip loads.

45. I photographed this waste and the photographs are produced and shown to me as [**Exhibits BA05 and BA06**].

46. I spoke with a number of residents, who wished to remain anonymous for fear of reprisals, who reported the following concerns to me:

a. That the site was vulnerable to multiple incursions and remained unsecured, and that this behavior would repeat.

b. That "enough is enough" in respect of fly tipping at the site

c. That Police had been called to the site following altercations and threatening behavior

d. Concerns as to safety of residents and concerns about possible vigilante behavior by people being driven to take the law into their own hands

e. General concerns about environmental health and vermin

f. Concerns about noise, raised voices, amplified music, cars beeping their horns and that such noise has impacted on

- sleep and ability to study or watch television
- g. Children associated with the encampment were throwing stones
- h. That a 90 year old resident had become upset as a result of noise, rubbish and disruption
- i. Parties at the site with music being played until 4.a.m.
- j. Petrol powered generators
- k. Bad smells emanating from the waste

**Industrial Park on westbound carriageway of A13 New Road,
Rainham – 14 April 2017**

47. On Thursday 12th April 2017 I visited the site of an unauthorized encampment at an Industrial park on the westbound carriageway of the A 13 New Road in Rainham near to the Dover's Corner Roundabout. This incursion is approximately 200 metres from a previous incursion by travellers at Unit 1 International Industrial Park Manor Way RM13 occupied only days previously.
48. This incursion is upon private land however statements of anti-social behaviour impacting on both domestic and commercial residents have been recorded as a result of the previous occupation. The site presents with a small amount of fly tipping equal to approximately 2 skips full. The waste is commercial in appearance with waste consistent with the trade of a builder.
49. I saw 2 dogs upon the site of incursion free roaming and untethered. I would describe these dog with the first being a white and tan 'Terrier' type dog, small with a Jack Russell appearance. The second dog was slightly larger and a 'Terrier' type dog, however still described as a small dog, tan in colour with a

dark muzzle.

50. Whilst on the westbound pedestrian carriageways adjacent to the A13 New Road both of these dogs had left the incursion and were barking at passing pedestrians. I saw the smaller of the two dogs intermingle with vehicular traffic on the westbound A13 carriageway. The larger of the two dogs came up to me and began to bark whilst snapping at my ankles. I was not bitten but the demeanor of both animals I would describe as aggressive. I saw this dog defecate upon the grass verge between the pedestrian carriageway and A13 westbound carriage.

51. Photographs were taken at the location which I present as photographic collage of which is produced and shown to me as **[Exhibit BA/07]**

Unit 1 International Industrial Park – 11 April 2018

52. On Wednesday 11th April 2018 I visited the International Industrial Park Manor Way Rainham Essex RM13 8RH. This land is both public highway and privately owned and situated within the London Borough of Havering.

53. The reason for my visit was to view land previously occupied by a traveller incursion upon the land decanted on the 8 April 2018 as it was known to be fly tipped. Private land off of the public highway leading to the bottom of Manor Way adjacent to a train level crossing was fly tipped with waste materials consistent with the trade of a builder. There were also signs of domestic waste and white goods within the fly tip. The waste was photographed produced and shown to me as **[Exhibit BA08]**.

54. I then attended Unit 1 and the international Industrial Park Manor Way Rainham Essex RM13 8RH. I saw an accumulation of waste upon land. The land was used prior to the traveller's incursion as car parking for adjacent businesses. This waste spanned the surface area of most of the land.

55. This waste was an accumulation of materials consistent with the trade of a builder and consisted of wood, fabricated plastics, cardboard and other general items.

56. The waste was photographed and produced and shown to me as [Exhibit BA09].

Industrial Park on westbound carriageway of A13 New Road, Rainham

57. On Wednesday 11th April 2017 I visited the International Industrial Park Manor Way just off of the westbound carriageway of the A13 New Road in Rainham RM13.

58. This is the site of a recently decanted incursion by Travellers at land adjacent to Unit 1 International Industrial Park Manor Way RM13 occupied only days previously.

59. This incursion is upon private land however statements of anti-social behaviour impacting on domestic residents have been recorded as a result of the occupation.

60. Commercial residents local to the incursion within land adjacent to unit 1 International Industrial Park Manor Way wished to provide information supportive of any action the Local Authority wished to take as a result of such an incursion.

61. I spoke with commercial businesses who conveyed to me what they saw and how this impacted upon them.
62. Concerns were expressed at the environmental impact of such incursions and the impact of the visual amenity of the area by the presence of the same.
63. The informants recounted that there is an historic rodent problem in the immediate area. The concerns of waste generation and illegal commercial waste disposal often associated with travellers feared would exacerbate this problem. Waste was seen within the parameter of the incursion and was photographed.
64. Fear of crime was also expressed as a result of this encampment both a fear of physical harm if challenged.
65. The informants also recounted how security measures were increased and additional staff hired as a result of the incursion to protect their land from illegal occupation. Awareness of building occupation and theft was also a fear. This had a costing additional to their normal security arrangements.
66. The informants stated a loss of amenity as the site occupied was a car parking area which resulted in vehicles being parked off of the Industrial Park. Damage to vehicles was also cited as a result of positioning these vehicles
67. An Informant recounted damage made to an electronic gate sensor mechanisms that will now need to be replaced. This was

alleged by the Traveller incursion previous to additional security measures being deployed.

68. An informant recounted business disruption by children of the Travellers by constantly calling the office on an electronic intercom. This unit also broke as a result of abuse.

69. An informant stated part of their business is to provide an emergency service to a statutory body. This service was compromised as parking of Travellers vehicles hindered ingress and egress from the informants compound.

70. An informant advised of the ownership of the land occupied and that they have received quotations for lawful removal of the waste deposited within the land adjacent to Unit 1 for £30,000.00.

71. I took photographs at the incursion and exhibit these within a photo collage as **Exhibit BA10**.

72. The informant's identities are known however through fear of intimidation or reprisal wished this not to be disclosed.

Tesco Bridge Road – 19 April 2018

73. On Thursday 19th April 2018 at 09.30hrs I visited Tesco in Bridge Road Rainham RM13 9YZ. This address is within the London Borough of Havering. This is private land aside from a small unit of land owned by the London Borough of Havering for the purpose of vehicle parking.

74. An encampment by travellers occurred at this location on the 13th March 2018 before being evicted by Bailiffs under TESCOs

instruction on the 14th March 2018. As a result of this encampment the store closed between 15.00hrs on the 13th March 2018 and re-opened at 10.30hrs on the 14th March 2018.

75. During the encampment incidences of verbal abuse and anti-social behaviour were anecdotally recorded which were detailed to me upon my visit to the Rainham store on the 19th April 2018.

76. Upon this date I spoke with shoppers at the store upon how such an incursion impacted upon them. I spoke to shoppers at the location over a period of approximately 2 hours. I recorded information upon how the incursion impacted upon shoppers at this store on pro-forma tick box sheets, a copy of which is produced and shown to me as **[Exhibit BA11]**.

77. 18 persons that I spoke with volunteered information however through fear of intimidation or reprisal wished this not to be disclosed. I spoke to 10 persons who identified themselves as resident within the London Borough of Havering. I spoke to 8 persons who identified themselves as resident within the London Borough of Barking and Dagenham. 6 persons came to the store during the period of closure on the 13th March 2018. 4 persons reported they had to postpone their shopping trip and 2 persons attended another store. 3 persons reported as feeling both intimidated and fearful of violence and witnessed persons within the encampment being verbally abusive and threatening Tesco security staff. 5 persons witnessed persons from the encampment in the store being disruptive and abusive. 2 persons were verbally abused themselves from the incursion group. 11 persons felt intimidated as a result of the incursion. 5 persons reported as a result of their experiences whilst the store was open for trading on the 13th March 2018 that they had to

postpone their shopping trip and 3 persons had to attend another store.

Tesco Bridge Road

78. An encampment by travellers occurred at this location on the 13th March 2018 before being evicted by Bailiffs under Tesco's instruction on the 14th March 2018.

79. On Friday 20th April 2018 I contacted residents local to recent traveller incursions at the International Industrial Park Manor Way and TESCO, Bridge Road Rainham RM13.

80. The contact was made by letter posting by hand to addresses within New Road Rainham, nearby to both incursions. The letter requested for local residents to recount how these recent traveller incursions had impacted upon themselves and their families. I produce and am shown a copy of this letter as **Exhibit BA12**

81. On Tuesday 24th April 2018 Havering Council received an E Mail from a resident via the on line Havering Council website local to the Traveller incursions. The resident wished to provide information supportive of any action the Local Authority wished to take as a result of such an incursion. The resident stated they saw travellers upon land described, as TESCO at Rainham and how the presence of this incursion had caused the temporary closure of the store. The resident felt it necessary to go to the neighbouring town to complete their shopping. This was recounted by the informant as very inconvenient.

82. Concerns were also voiced at the clean-up costs that rubbish left behind costs to clear up afterwards. The resident also informed of

an incursion upon the International Industrial Park Manor Way Rainham Essex RM13 8RH, and how this has become a dumping ground. This site was occupied by a traveller incursion in April 2018 and is land privately owned.

83. The resident reports a mountain of building rubble, pallets and domestic refuse, as well as rodents plaguing the area. The informant stated they have noticed at least one feral cat; and that there are probably many more. They gave historical reports of a former encampment within the Bell Public House car park in Rainham to which they found to be intimidating to go to the nearby library on foot.

84. The informant lives within proximity by local address to the incursion within the international Industrial Park Manor Way Rainham Essex RM13 8RH. The informant's identity is known however through fear of intimidation or reprisal wished this not to be disclosed.

Unit 1 International Industrial Park Manor Way Rainham

85. On Saturday 21st April 2018 I received an Email from a resident local to a recent Traveller incursion at Unit 1 International Industrial Park Manor Way, Rainham, Essex RM13 8RH. The resident wished to provide information supportive of any action the Local Authority wished to take as a result of such an incursion.

86. This land is privately owned and situated within the London Borough of Havering. This incursion is upon private land however statements of anti-social behaviour impacting on both domestic and commercial residents have been recorded as a result of the previous occupation.

87. This land was decanted by travellers on the 8th April 2018. The land was fly tipped by the Travellers within this incursion.

88. The E Mail stated the incursion impacted upon the resident and explained they are faced with an eyesore of fly tipped rubbish covering the whole of the car park opposite their property. The E Mail stated that whilst the caravans, vans and lorries were on the site they felt very unsafe within their home and had to take extra precautions whilst their home was empty.

89. The E Mail stated they saw vehicles moving into the site one by one as a 40 tonne tipper truck visited, making room for the dump. They recounted they saw this one day as they came home. The E Mail stated that not only is it an eyesore but there is a very nasty smell and the added risk of vermin.

90. The E Mail stated this is not the first time this car park has been fly tipped, and that something should be done to stop these actions. The resident lives within proximity by local address to the incursion within Unit 1 International Industrial Park Manor Way Rainham Essex RM13 8RH. The resident's identity is known however through fear of intimidation or reprisal wished this not to be disclosed.

**Unit 1 International Industrial Park Manor Way Rainham
Essex**

91. On Wednesday 25th April 2018 I received an E Mail from a resident local to a recent Traveller incursion at Unit 1 International Industrial Park Manor Way Rainham Essex RM13 8RH. The resident wished to provide information supportive of

any action the Local Authority wished to take as a result of such an incursion. This land is privately owned and situated within the London Borough of Havering.

92. This incursion is upon private land and statements of anti-social behavior impacting on both domestic and commercial residents have been recorded as a result of the previous occupation.

93. This land was decanted by travelers on the 8th April 2018. The land was fly tipped by the Travellers within this incursion.

94. The E Mail stated the resident continually watched as 4 to 6 loads a day of waste was fly tipped over a two week period. The E Mail stated the resident experienced a lot of noise from electrical generators. The E Mail stated the resident Could not sleep with the windows open due to the noise from the incursion. The E Mail stated the resident did not want to approach the incursion in case it caused a problem.

95. The E Mail stated the resident kept seeing 2 dogs barking and chasing people along the road. The E Mail stated the resident saw dogs from the incursion running into the road and could have easily caused an accident. The E Mail stated the resident witnessed tipper vans which were not taxed and parking within places that were dangerous. The E Mail stated the resident lost the amenity of parking near to their home as travellers vehicles were parked within parking bays along the road also so the people that live near had to find elsewhere to park. The E Mail stated the resident was very disappointed every time they looked out of their window all they see is a car park full of rubbish that will probably be running with rats. The E Mail stated the resident has seen people within the fly tip there looking for stuff and children playing in there, the informant

raises safety concerns.

96. The resident lives within proximity by local address to the incursion within Unit 1 international industrial Park Manor Way, Rainham Essex RM13 8RH. The resident's identity is known however through fear of intimidation or reprisal wished this not to be disclosed.

The Cockney Gent Public House

97. On Friday 25th May 2018 at 06.06hrs I visited Land at 88 Petersfield Avenue, Harold Hill, ROMFORD RM3 9PB. This is an address within the London Borough of Havering. This site formally housed The Cockney Gent Public House. This land is private and not owned or maintained by the London Borough of Havering.

98. This address was vacated by Travellers on Thursday 24th May 2018. I took 12 photographs at the location and present these as 3 photo collages on 3 A4 sheets which I Exhibit as **BA13**.

99. I found the site fly tipped with both domestic and commercial waste including items of furniture and kitchen appliances. I also saw 2 propane gas canisters within the waste. I saw bags of excrement contained within a plastic bags including one which was hung upon a fence railing.

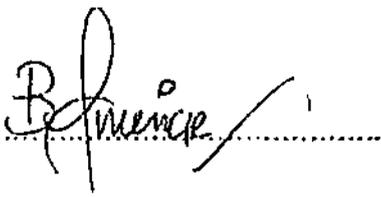
The Pompadours Public House

100. On Friday 25th May 2018 at 06.30hrs I visited Land at Hilldene Avenue, Romford, RM3 8DJ. This is an address within the London Borough of Havering. This site formally housed The Pompadours Public House.

101. This land is private and not owned or maintained by the London Borough of Havering. This address was occupied by an unlawful encampment of Travelers. I took 16 photographs illustrative of the location and present these as 4 photo collages on 4 A4 sheets which I Exhibit as **BA14**. I found the site heavily fly tipped with both domestic and commercial waste including items of furniture and bathroom appliances.

102. On Monday 24th May 2018 Travelers decanted the land. At 13.51hrs on Tuesday 29th May 2018 I attended the site again and took photographs illustrative of the waste left following the encampment. I took 30 photographs illustrative of the location and present these as photo collages on 4 A4 sheets which I Exhibit as **BA15**.

I believe that the facts stated in this witness statement are true

Signed.....

Dated: 29 October 2018

Claimant: LB Havering
Barry Amerige
Second
Exhibits: BA16
Date:14.06.2018

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND XX DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF BARRY AMERIGE

1. I Barry Amerige a Street Scene Enforcement Officer in the employment of the London Borough of Havering based at Mercury House, Romford RM1 3SL.
2. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014, against the above named Defendants.
3. The facts in this witness statement come from my own knowledge or, where they are not from my own knowledge, they are true to the best of my knowledge and belief.

4. I have held my current position for 3 years, from September 2015. I was employed by the London Borough of Newham as a Senior Criminal Law Enforcement Officer for 15 years. Prior to 2001 I was a Law Enforcement Officer within various Local Authorities and Government Agencies.
5. I have previous experience in dealing with traveller incursions, but my current duties concern managing the enforcement action to be taken for environmental crime within the London Borough of Havering. I have a good breadth of knowledge of relevant legislation and delegated authority to deal with such matters.

The Pompadours Public House

6. On Monday 21st May 2018 I hand delivered letters to residents local to an illegal traveller incursion at the site of a former public house The Pompadours in Hildene Avenue, Romford, RM3 8DJ.
7. This was to inform residents that I wished them to convey how these encampments have impacted upon them to support such an injunctive application.
8. Residents were asked if they wanted their experiences to be included within this application to telephone or email me in confidence.
9. I Exhibit a copy of this letter as **BA16**.

21st May 2018

10. An E Mail was received by me at my work email account at London Borough of Havering on Monday 21st May 2018 this was from a local resident who wished to provide information

supportive of any action the Local Authority wished to take as a result of such an incursion.

11. The informant conveyed how this impacted upon them and their family.
12. They expressed frustration regarding encampment and that the site remained unsecure as to prevent repeated incursions.
13. They expressed that enough is enough regarding the waste being deposited at the site.
14. The informant is resident within proximity by local address to the incursion within Hildene Avenue, Romford, RM3 8DJ.
15. The informant's identity is known, however through fear of intimidation or reprisal wished this not to be disclosed

21st May 2018

16. An E Mail was received by me at my work email account at London Borough of Havering on Monday 21st May 2018 this was from a local resident who wished to provide information supportive of any action the Local Authority wished to take as a result of such an incursion.
17. The informant wished to convey how this impacted upon them and their family.
18. The informant stated how waste fly tipped at the former public house The Pompadours in Hildene Avenue, Romford, RM3 8DJ was both an eyesore and a risk to health.
19. The informant stated that Police had been called to the location following altercations and threatening behaviour.

20. The informant expressed concerns for their own safety and that of others.
21. The informant also stated a worry of vigilante behaviour driven by people wanting to take the law into their own hands.
22. The informant is resident within proximity by local address to the incursion within Hilldene Avenue, Romford, RM3 8DJ.
23. The informant's identity is known, however through fear of intimidation or reprisal wished this not to be disclosed.

21st May 2018

24. An E Mail was received by me at my work email account at London Borough of Havering on Monday 21st May 2018 this was from a local resident forwarded by a Local Havering Elected Ward Councillor who wished to provide information supportive of any action the Local Authority wished to take as a result of such an incursion.
25. The informant wished to convey how this impacted upon them and their family.
26. The informant stated concern over increasing levels of fly tipping.
27. The informant stated concern over intimidation of local residents and shopkeepers.
28. The informant expressed concern over environmental health standards.
29. The informant stated concern over rats and filth.

30. The informant is resident within proximity by local address to the incursion within Hilldene Avenue, Romford, RM3 8DJ.

31. The informant's identity is known, however through fear of intimidation or reprisal wished this not to be disclosed.

22nd May 2018

32. An E Mail was received by me at my work email account at London Borough of Havering on Tuesday 22nd May 2018 this was from a local resident who wished to provide information supportive of any action the Local Authority wished to take as a result of such an incursion.

33. The informant wished to convey how this impacted upon them and their family.

34. I had a telephone conversation with the informant on the 22nd May 2018 where the following points were recounted to me.

35. There was recounted noise from raised voices and laughter emanating from the encampment together with loud amplified music.

36. There were also concerns of shouting and cars beeping horns from passing traffic directed at the encampment.

37. The noise of the incursion has impacted upon sleep for all the family. This has also impacted upon the ability to study or watch television.

38. The informant recounted that rats have been seen in the area especially early morning. This was recounted as coming from the site of the former Pompadours Public House.

39. There is an amount of waste contained within the perimeter of the

former Pompadours Public House site. This was estimated visually by the informant as several large skip containers full.

40. Concerns of waste generation and illegal domestic and commercial waste disposal often associated with travellers feared would exacerbate this rat problem.
41. Concerns were also expressed at the environmental impact of such incursions and the impact of the visual amenity of the area by the presence of the same.
42. Fear of crime was also expressed as a result of this encampment. Both a fear of physical harm if challenged and goods and items being removed from outside of properties and burglary.
43. The informant is resident within proximity by local address to the incursion within Hildene Avenue, Romford, RM3 8DJ.
44. The informant's identity is known, however through fear of intimidation or reprisal wished this not to be disclosed.

24th May 2018

45. An E Mail was received by me at my work email account at London Borough of Havering on Thursday 24th May 2018 at 10.27hrs.
46. This was from an informant whom is resident within proximity by local address to the incursion within Hildene Avenue, Romford, RM3 8DJ.
47. The informant expressed concerns over noise emanating from the encampment especially late at night.
48. There were specific concerns over music emanating from the

encampment.

49. The informant expressed concerns over the dumping of rubbish at the site of the encampment.

50. The informant also expressed concerns of children from the encampment throwing stones.

51. The informant's identity is known, however through fear of intimidation or reprisal wished this not to be disclosed.

24th May 2018

52. On Thursday 24th May 2018 at 17.16hrs An EMail was received by me at my work email account at London Borough of Havering.

53. This was to advise that the traveller encampment at The former Pompadours public house site within Hilldene Avenue, Romford, RM3 8DJ were tipping general waste and rubbish on the land within the car park and was using the grassed area as a toilet.

54. The informant is resident within proximity by local address to the incursion within Hilldene Avenue, Romford, RM3 8DJ.

55. The informant's identity is known, however through fear of intimidation or reprisal wished this not to be disclosed.

30th May 2018

56. An E Mail was received by me at my work email account at London Borough of Havering on 30th May 2018.

57. This was from a local resident who wished to provide information supportive of any action the Local Authority wished to take as a result

of such an incursion.

58. The informant conveyed how this impacted upon them and their family.

59. They expressed concerns over the possibility of Travellers returning to this site as there has been at least 2 incursions at the location so far in 2018.

60. They expressed concerns from a 90 year old neighbour who came to them several times upset about the noise, rubbish and general disruption.

61. The noise of the incursion has impacted upon sleep for all the family.

62. This has also impacted upon the ability to study or watch television.

63. The noise has taken the form of a mechanical fuelled electrical generator which was described as being clearly audible 24 hours a day.

64. The informant also describes parties at the site and recounted 5 times when music was played between midnight and 4am.

65. The informant stated several occasions when police were called because of the noise.

66. The informant describes a lot of shouting and screaming at various times of the day and night.

67. The informant expressed a fear of not feeling safe leaving their home unattended to go to work.

68. They informed that an elderly neighbour also did not feel safe.

69. The informant witnessed persons within the incursion throwing leftover food and other waste onto the heaps of fly tipped rubbish on

the site.

70. The informant stated they have seen rats and flocks of birds swarming to eat food scraps fly tipped.

71. The informant gave concerns of smells from the fly tipped waste at the site.

72. The informant recounts an increase in bird numbers with birds coming to the fly tipped rubbish as a source of food.

73. The informant stated that they had never heard birds in this area until the rubbish was dumped apart from the odd one on the roof.

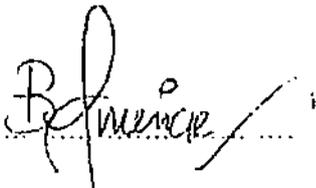
74. They stated it is very much disturbing our everyday life.

75. They expressed a fear of rodents coming into their garden and property because of what is fly tipped.

76. They also suspected theft of electricity supply as the boarding to the pub was removed and the generator stopped a few weeks previously.

77. I believe that the facts stated in this witness statement are true .

Signed.....

A handwritten signature in black ink, appearing to read 'R. Francis', written over a dotted line. The signature is cursive and includes a large flourish at the end.

Dated: 14th June 2018

Claimant: LB of Havering
Statement: Stephen Edwards
Exhibits: SE/01-SE/156
Date: 28.07.2018

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

Claim Number: _____

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS
LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO
FORM ENCAMPMENTS IN THE LONDON BOROUGH OF
HAVERING

Defendants

WITNESS STATEMENT OF STEPHEN EDWARDS

I, Stephen Edwards, Parks Police Officer employed by the London Borough of Havering, WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for an interim and final injunction. The facts stated in this statement are within my known knowledge unless otherwise stated. Where facts are outside of my direct knowledge, they are true to the best of my knowledge and believe.

2. I am a Parks Police Officer, employed by the London Borough of Havering for the purpose of Policing the Borough Parks and Open Spaces by enforcing pleasure ground byelaws and other relevant criminal and traffic legislation.

Incursions between 2015 – 2016

3. I attach as **Exhibit SE/01** a Spreadsheet of all Travellers Incursions between 2015 – 2017 which is a summary of all reports recorded on the London Borough of Havering Parks Police computer system. The List identifies where relevant, the incident date, the Iris number of each report generated as a result of the incursion with the location, the officer attending and where indicated details of the incident or the Officer's general notes inputted on the system. From this Spreadsheet I have identified separate traveller incursions.

Chudleigh Road Open Space 23/09/2015 - 29/09/2015

4. On 24th September 2015 I arrived at 9:45 a.m. to an unlawful traveller encampment which took place at Chudleigh Road Open Space. On that date six caravans entered onto grass area overnight. I attended the location with another officer Martin Stanton who was the Parks and Open Spaces Manager. The travellers Intention was to remain there as long as possible. I was aware foreign travellers were allowed to stay on same area recently. Arrangements were in hand to return with planning officers to serve a notice. They intimated they would hop from one piece of land to another within this area to frustrate any steps to remove them. I advised them of the consequences if fly tipping took place. The Metropolitan police were aware of the incursion, however the

Planning department agreed to liaise to co-ordinate the necessary action. I exhibit IRIS report 20683 as **SE/02**

5. On 24th September 2015 I arrived at 15:11 pm to an unlawful traveller encampment which took place at Chudleigh Road Open place. At the location there were six caravans, no vehicles, and no occupants. Myself and Officer Stephen Rawlins accompanied two planning officers to serve section 77. Notices left on all caravans with registration numbers Index **GU58ULV**, **NL07YH**, **AK59XKF**, **RA52WHT**. Two caravans were not displaying any Indexes. I exhibit IRIS report 20684 as Exhibit **SE03**. This group eventually moved onto Painsbrook Way Open Space.

Painsbrook Way Open Space – 29/9/15

6. On 29th September 2015 I arrived at 14:06 hours to unlawful traveller encampments at Painsbrook Way Open Space to find vehicles of the following description;
 - i) Red Vauxhall index EX10HFV. I exhibit IRIS report 20678 as **SE04**
 - ii) White Truck 'Green leaf' label index **GU58ULV**. I exhibit IRIS report 20679 as **SE05**
 - iii) Space White & black Ford Transit index KS04URN. I exhibit IRIS report 20680 as **SE06**
 - iv) Black Ford index **AK59YXF**. I exhibit IRIS report 20681 as **SE07**
 - v) Registration **RA52WHT**. I exhibit IRIS report 20682 as **SE08**

Derelict Building site Roneo Corner – 12/12/15

7. On 12th December 2015 I arrived at 10:30 a.m. to an unlawful traveller encampment at an address in the ward of Hylands. There were still only four caravans in the builders yard. Bunding was in place to prevent vehicle access to park. I exhibit IRIS report 21315 as **Exhibit SE/09**.
8. On 12th December 2015 at 15:28 pm hours I attended the same location and noticed there were now six caravans on site. I exhibit IRIS report 21320 as **Exhibit SE/10**.

Forestry Commission land- Ingrebourne Hill - 26/2/16

9. On 26th February 2016 I arrived at 18:36 pm to an unlawful traveller encampment at an address in the ward of Elm Park. Travellers had entered Forestry Commission land at Ingrebourne Hill. I conducted a site check to see how many caravans were on site but it was dark to see number of caravans. I exhibit IRIS report 22144 as **Exhibit SE/11**. The Travellers were eventually removed by land owner.

Stone Mason site, Lower Bedfords Road – 9/3/16

10. On 9th March 2016 I arrived at 11:03 am to and unauthorised traveller encampment to an address in Havering Park. Travellers on a stone mason site, lower Bedfords Road. They were still at the site, and no movement. I exhibit IRIS Report 22293 as **SE/12**. A hear hearing was listed at 10am Tuesday 15 March 2016 at Romford County Court for a repossession order pursuant to s78. The Travellers had left the site by 14:20 that day.

Derelict site St Georges Hospital – 22/4/16

11. On 22nd April 2016 at 12:11 I accompanied PC Ron Clayden to an unlawful travellers encampment at St. Georges Hospital .a vehicle was present registration FD05 WZN. I exhibit IRIS Report 22863 as **SE/13**

Bedfords Park – 27/6/16

12. On 27th June 2016 at 18:26 pm a call was received by PC Ron Clayden regarding an unlawful travellers encampment at Bedfords Park. I exhibit IRIS Report 23603 as **SE/14**

King Georges Playing Fields – 7/3/16

13. On 7th March 2016 I arrived at 13:45 pm to an unlawful traveller encampment in King Georges playing fields where there were twelve traveller caravans and vehicles parked up along length of Park footpath, not unhitched. I remained on scene, gave them two hours to leave the park and at 16:00 hrs they all left, with no incidents. I exhibit book entry of 7th March 2016 and emails of 7th March 2016 as **Exhibit SE/15**

Land adjacent to Gidea Park Library – 14/7/16

14. On 14th July 2016 I arrived at 11:35 am hours at Central Park. I was static in car park, the inner vehicle gate lock was missing in the morning, the travellers had made threats to return to the park. They were served notice to vacate by 5pm on that date. I exhibit IRIS Report 23799 as **SE/16**.

15. On 14th July 2016 at 13:05 pm hours I arrived at the park to check the park, and noticed travellers were still present. I exhibit IRIS Report 23800 as **SE/17**.

Chudleigh Road Open Space 15/07 -19/07/2016

16. On 15th July 2018 PC Rawlins arrived at 19:01 pm to an unlawful travellers encampment at Chudleigh Road Open Space where there were 11 caravans on site. I believe these were the same group as previously at Central Park. They were advised to leave by Monday morning first thing. I exhibit IRIS Report 23836 as **SE/18**.

17. On 17th July 2016 at 10:44 am I arrived at Chudleigh Road Open Space to undertake a site visit. I exhibit IRIS Report 23857 as **SE/19**.

18. On 17th July 2016 at 15:53 pm I arrived at Chudleigh Road Open Space to undertake a site visit. I exhibit IRIS Report 23872 as **SE/20**.

19. On 18th July 2018 at 09:06 am I arrived at an unauthorised traveller encampment at Chudleigh Road Open Space with Officer Stephen Rawlins. One of the ladies was taken into hospital the previous evening as she was expecting a baby. At 9:15 am hours a trespass notice was served giving them until noon tomorrow to vacate the land. I exhibit IRIS Report 23874 as **SE/21**.

Derelict land , Romford Town Centre, Angel Way – 18/7/16

20. On 18th July 2016 at 12:35 pm I arrived at Westland Playing Fields. The purpose of the visits on this day were to ensure site security in response to reports received. The main gates were wide open, the school was using main field. The main gate was locked to prevent

the Travellers entering as they were on the move from the town centre. I exhibit IRIS Report 23910 as **SE/22**

21. On 18th July 2016 at 12:40 pm I arrived at Jutsums Recreation Ground. Travellers were on the move from the town centre, the vehicle gate was checked to ensure it was locked and secure. I exhibit IRIS Report 23911 as **SE/23**

22. On 18th July 2016 at 12:44 pm I arrived at Lilliput Road Open Space. The Travellers were on the move from the town centre, the vehicle gate was checked to ensure it was locked and secure. I exhibit IRIS Report 23912 as **SE24**

23. On 18th July 2016 at 12:55 pm Stephen Rawlins arrived at Cottons Park. He was static in the Park, awaiting the direction of travel of the evicted Travellers from the Town Centre. Cottons Park is the nearest Park to their eviction site. I exhibit IRIS Report 23913 as **SE/25**

24. On 18th July 2016 at 13:12 pm I arrived at Bretons Outdoor Recreation Ground. The Travellers were on the move from Romford town centre, the vehicle gates were checked to ensure it was locked and secure. I exhibit IRIS Report 23914 as **SE/26**

25. On 18th July 2016 at 13:29 pm I arrived at Hornchurch Country Park. The Travellers were on the move from the town centre, the vehicle gate was checked to ensure it was locked and secure. I exhibit IRIS Report 23915 as **SE/27**

Central Park, Harold Hill 19/07- 20/07/2016

26. On 20th July 2016 at 11:30 am PC Stephen Rawlins attended an unauthorised travellers encampment at Central Park. Travellers were to be evicted at 12 noon. The Metropolitan Police and Ground Maintenance team were warned to attend at 1130hrs along with other officers John Jones , Gary Carr and Stephen Rawlins. The caravans had moved on but relocated to a nearby site at Priory Open Space. I exhibit IRIS report 23895 as **SE/28**

Priory Road Open Space 20/07/2016

27. On 20th July 2016 at 16:51 pm PC Stephen Rawlins attended an unauthorised traveller encampment at Priory Road Open Space. He attended the site, there was no disorder. A member of the group in the name of Eddie was in charge but was not on site to be served with a notice. PC Rawlins planned to attend again the next day. I exhibit IRIS Report 23899 as **SE/29**

Havering Country Park 20/07-21/07/2016

28. On 21st July 2016 at 09:45 am PC Stephen Rawlins attended an unlawful traveller encampment at Havering Country Park. Caravans entered during the night. The site was visited and 4 caravans were found on the field next to Pinewoods with two vehicles. An Order was issued to leave the site by 3 o'clock and three out of four left by 1300 hrs. One caravan was insecure and no towing vehicle remained on site. The Safer Neighbourhood Team arrived on scene for vehicle checks and were ready to provide support, however this was not required in this instance. All caravans were removed by 1450 hours. I exhibit IRIS Report 23902 as **SE/30**

Wincanton Open Space 23/08/2016

29. On 23rd August 2016 at 11:35 am I arrived at location in the ward of Gooshays. Six traveller caravans were on the grass at Wincanton which had Irish number plates. A note was taken of one red transit van, index 08-DL-3766 . I exhibit IRIS Report 24136 as **SE/31**

Chudleigh Open Space 24/08/2016

30. On 24th August 2016 at 11:55 am I accompanied PC Stephen Rawlins and arrived at Chudleigh Road Open Space. Stephen Rawlins was contacted by Simon Thelwell who requested him to serve a notice on the travellers at the location. After printing the notice, but before Stephen Rawlins started to issue the notices, he was made aware of the police presence in unmarked cars nearby in Chudleigh Road. He was advised that immediate action was likely so handed responsibility to local Metropolitan Police resources standing by and we made our way to block access at Priory Road Open Space. The caravans were moved off by the Police and we made our way to the Benskins site. The following caravans were on site showing index YK62KWG, 161-T-18, 161-G-521, 161-T-694. The following motor vehicles were on site; Black Nissan pickup 09-0Y-7516, Red Transit 06-DL-3766, white Golf 161-T-16, grey VW passatt 12-D-38968. I exhibit IRIS Report 24149 as **SE/32**

Lilliput Road Open Space 08/09/2018 - 10/09/2018

31. On 8th September 2016 at 12:45 pm I arrived at Lilliput Road Open Space and noticed that travellers were still on this site. I exhibit IRIS Report 24311 as **SE/33**

32. On 9th September 2016 at 10:28 am I arrived at Lilliput Road Open Space and noticed that travellers were still on this site. I exhibit IRIS Report 24326 as **SE/34**
33. On 10th September 2016 at 10:14 am PO G Jones arrived at another address in ward Rainham and Wennington, Rainham Marshes to undertake a site visit. I exhibit IRIS Report 24342 as **SE/35**
34. On 10th September 2016 at 10:43 am Support Officer Gareth Jones arrived at Lilliput Road Open Space. The Travellers had all been removed by Bailiffs, and the park gate re-secured with chain and D lock. Some of the Vehicles on site were as follows; Blue BMW 120d MX64XNF; Gold Ranger SR16FKL; White Toyota Hilux PK14YUL; Grey/blue Ranger LN57XWY; Silver Mercedes ML AE56XJY; Silver Peugeot KR13ZPY, White/Grey flat bed Transit NL07WDK, Black Range Rover YC14UKV . I exhibit IRIS Report 24344 as **SE/36**

Priory Road Open Space 11/09/2016-12/09/2016

35. On 12th September 2016 at 07:35 am I arrived at Priory Road Open Space. I noted five caravans, four transits and a car. They were displaying Irish plates. The vehicles were present on open space and had arrived the previous evening around 18:00 hrs. I exhibit IRIS Report 24345 as **SE/37**
36. On 12th September 2016 at 11:30 hours PC John Jones and Stephen Rawlins arrived at Priory Road Open Space as they were on bike patrol. A notice to leave land served on Travellers by PC Stephen Rawlins. I exhibit IRIS Report 24349 as **SE/38**

37. On 12th September 2016 I arrived at 14:00 pm at Priory Road Open Space. The Travellers had now left and their current whereabouts was not known. Some domestic litter needed to be removed from site and the matter was in hand. I exhibit IRIS Report 24358 as **SE/39**

Private Land- Non Operating Palms Hotel, A127 06/10/2016

38. On 6th October 2016 at 11:00 hours I arrived at location in the ward Harold Wood, a premises previously known as Palms hotel. Approximately 20 Traveller caravans were on site. Bailiffs arrived on scene with Metropolitan Police Service to remove the vehicles. I parked in the vicinity to ensure they don't move on to park land and also to record any VRM's. The following vehicles were present; Red Transit SE65AZF, Blue Golf UHZ5274, Blue Transit NGO 3FX, Caravan VRM BG05 UKL, Blue Transit E056 KTL, Transit YC54 GFY, Silver 4x4 CA02 KXY, SA16 LZW white van, White transit van with green back EY54 WLF, white transit FY15 WWB, Grey Transit EY51 CVA, Transit VUI 9541, Transit VUI92-9, red Transit 11-D-49410, White transit BL55 FAK. I exhibit IRIS Report 24629 as **SE/40**

Harrow Lodge Park 16/10/2016

39. On 16th October 2016 at 11:42 am I accompanied PC Ron Clayden and arrived at Harrow Lodge Park. As officers were leaving the park grounds after a general patrol, four (4) Traveller caravans entered the ground to remain at the location. The occupants were advised by the officer that they would commit an offence contrary to the parks byelaws as the caravans were an unauthorised structure in which they could be reported for the offence which holds a penalty of

up to £500.00 per vehicle. The travellers were directed to leave the grounds immediately to prevent prosecution action. The group were escorted from the land and headed in the direction of Hornchurch Town Centre. Police were updated on CAD 7393. Vehicles that were present are as follows: Silver Mercedes ML VRM- 1 DCK 752 Caravan VRM: DO 078 SA, Blue E Class Mercedes VRM: 400 ANC Caravan VRM: HA 528 RM, Silver Volvo VRM: 12 EVL 91, Caravan VRM: UUC 208, Vehicle VRM: XG 6001, Caravan VRM: DC 154 QT I exhibit IRIS Report 24745 as **SE/41**

Incursions in 2017 to date

Chudleigh Road Open Space 15/06/2017

40. On 15th June 2017 at 11:16 am I arrived at Chudleigh Road Open Space and noted that travellers have moved onto green. I attended the location and noted that five caravans have moved onto site index 12-D-3119; 02-LH-1471 (SILVER MERC VAN); 10-G-19965 (WHITE TRANSIT); LN12VXG (MONDEO). The travelers indicated that they had no intention of moving without court order. I exhibit IRIS Report 28021 as **SE/42**

Havering-atte-Bower Cricket Club 21/06- 23/06/2017

41. On 22nd June 2017 at 10:15 a.m. I arrived at Havering Village Green (Bower Cricket Club) 09:44 am to find nine (9) caravans still located on the site. I exhibit IRIS Report 27978 as **SE/43**

42. On 22nd June 2017 at 12.20pm. I arrived at Havering Atte Bower Cricket club and checked the site. There was no visible fly tipping at this time. I spoke with several male Travellers on site, and noted

what I would describe as "jovial banter" at this time. I exhibit IRIS Report 27984 as **SE/44**

43. On 22nd June 2017 at 16:45pm. I arrived at the same location and liaised with Cllr Wallace and Baliff Phil Cutts at Havering Atte Bower Cricket field regarding a proposed eviction that was scheduled for the following day in the morning. I exhibit IRIS Report 27990 as **SE/45**

44. On 23rd June 2017 at 7:45 am I arrived at Bedfords Park, travellers at Havering Atte Bower Cricket ground being moved off that morning. The Park vehicle gate was closed to all unauthorised vehicles until eviction concluded, and they were deployed at the gate. At 09:00 am I was joined by Officers Gareth Carr and Dan WESTON. I exhibit IRIS Report 27964 as **SE/46**

45. On 23rd June 2017 at 11:20 am I arrived at Havering Village Green (Bower Cricket Pitch). They were positioned on the grass verge to prevent Travellers from driving onto the Village green. At 11:30am I notified the Metropolitan Police Service who indicated they will be serving section 61 Notice on the Travellers. At 11:40 am a call was received from a local landowner, the padlock was missing from gate leading into his field off Orange Tree Hill. A 'D' lock was supplied by Stephen Rawlins to place on the gate. The landowner has also positioned his vehicle across gate. At 11:48 am the Travellers were 'pulling off' the cricket field. At 11:53 a.m. they were queuing up along road outside the Hospice which was facing the Village Green. The road was blocked, forcing Travellers right. Vehicle index 12-lk-917 (Transit); 12-D-3119 (VW PASSAT) ;06-WX-4118 (TOYOTA VAN); 10-G-19965 (WHITE TRANSIT);07-KK-1934 (KIA

4X4);SK17MZV (WHITE VW PASSAT); 97-KK-1065 (TOYOTA WHITE PICKUP); 132-50-465. The Convoy travelled down Church Road, right into Chequers Road, and was prevented from entering onto Wincanton Road. It passed Broxhill, across into Lower Bedfords Road at 12:26. The Travellers then turned right into Orange Tree Hill and upon arriving at the landowners now locked gate. I noticed all vehicles did three point turns and made their way back down Orange Tree Hill. At the traffic lights, they turned right heading towards Collier Row. Stephen Rawlins on his bike arrives at Collier Row Rec to find gates wide open, and closed the gates just prior to Travellers arrival. The travelers initially made an effort to enter Park. They drive off down White Hart lane, Morney Road and through the town centre and eventually arrive at Central Park in Dagenham. At 13:06 I placed a new padlock on the gate at Collier Row Rec and spoke to staff who were working in the Park, who stated the padlock was secure on the gate when they entered at lunch time. I exhibit IRIS Report 27973 as **SE/47**

Tees Drive Open Space 04/07/2017

46. On 4th July 2017 at 9:44 am PC Stephen Rawlins and I arrived at Tees Drive Open Space. He attended the site and dealt with two caravans belonging to the family O'Brian, with many of the children dumping waste in the stream. Vehicle 11-mo-3443 white transit was towing. I was told that the group originate from Ireland, Galway. I was told that 'JJ' is the son but date of birth unknown. Photographs were sent to Planning Officer Simon Thelwell who would arrange removal of the travellers. I advised the Council a service more than street cleaners would be required as there had been substantial

dumping of builders type waste at the site. 12k-ky-222. I exhibit IRIS Report 28198 as **SE/48**

47. On 4th July 2017 at 11:05 am I arrived at Central Park and noticed the travellers had been removed from Tees Drive. I checked the park and the inner vehicle gates were wide open. These were then relocked. I exhibit IRIS Report 28200 as **SE/49**

Whitchurch Road Open Space 05/07/2017

48. On 5th July 2017 at 8:50 am I accompanied PC Stephen Rawlins and arrived at Whitchurch Road Open Space. He was called to investigate caravans camped on a grass verge at Whitchurch Road near Chudleigh. There was building debris fly tipped behind caravan into woods. Photo were taken of the travellers. They then left and split up later and gathered again in Bosworth field. I exhibit IRIS Report 28209 as **SE/50**

Collier Row Recreation Ground 12/07- 13/07/2017

49. On 13th July 2017 at 11:40 am I accompanied PC Clayden and arrived at Collier Row Recreation Ground. A call was received relating to travellers located at Collier Row Recreation, having entered the land unlawfully contrary to parks byelaws. We noted the following vehicle:

09-CE-9247 White Ford Transit Van

BJ-13-SZX Red Audi

171-D-3510 White Audi

08-D-37667 Silver Audi

05-LK-1290 Blue Ford Transit

161-CW-175 Grey Ford Transit

11-MO-3443 White Ford Transit

50. Inspector Rawlins verbally directed the group to leave the parks grounds. A 1 Hour direction to leave was given. The group is known to Inspector Rawlins and PC Edwards for previously fly tipping at other sites within the locations known as WINCANTON ROAD, CHUDLEIGH GREEN and HORSE RIDE LANE, STAPPLEFORD ABBOTTS (11.07.2017). A formal notice to leave was issued. Other key locations have been advised including private land owners, where possible. I exhibit IRIS Report 28287 as **SE/51**

Brittons Park 24/08/2017

51. On 24th August 2017 at 14: 20 PC Stephen Rawlins and PC Gary Carr arrived at Brittons Park. Nine (9) Caravans were on the Park,. They had entered via vehicle barrier and a padlock was cut off. They had also removed perimeter bollards. All caravans were removed by Officers the same day as a result of byelaw infringements. Site security was upgraded in February 201 with two (2) new vehicle gates and height barriers installed and ten (10) bollards at a total cost of **£3897**. I exhibit IRIS report 28741 as **SE/52**

Tesco, Gallows Corner 05/09/2017

52. On 5th September 2017 at 11:33 am PC Stephen Rawlins arrived at Tesco's in Gallows Corner, however the vans had all left by our arrival. I exhibit IRIS Report 28919 as **SE/53**

Abbey Road, Rainham 10/04/2017-11/04/2017

53. On 11 April 2017 at 10:50 a.m. PC Rawlins arrived at Abbey Road in Rainham. It was reported that several caravans have entered the site and changed a lock to the main gate. The police served a Section 61 notice to leave by 12 noon that day. A message had been received from Planning Officer Simon Thelwell and that caravans were apparently arriving late last evening around 2030hrs. Officers 172 and 513 called in early, otherwise they would not have been starting work until 1100hrs. Further vehicles were prevented from accessing the site and full eviction was commenced by 2 pm. I exhibit IRIS Report 27492 as **SE/54**

54. In total between 2015 – 2017 the Parks Police dealt with 27 unauthorised incursions by travellers in the Borough.

Berwick Woods – 20 April 2018 to 7 May 2018

55. This unauthorised encampment took place on Forestry Commission land known as Berwick Woods, Berick Pond Road, Rainham, RM13. On Friday 20 April 2018 at 11:39, I was in full uniform, on mobile patrol, driving a marked vehicle in company with PC Jones, at the stated location.

56. As I entered the land, I could see that the metal height barrier had been cut off and the left hand post and gate were removed, all discarded on the grass bank. We drove up into the car park; five caravans were situated to the left and a further three on the right.

57. As we drove through the car park onto the grass, there was a large pile of waste on the left side. As we continued round to our right of the car park and towards the trees that surround the car

park, we found at least a further eight (8) piles of waste dumped.

58. We drove back into the car park and out of the entrance. I did not recognise any of the vehicles, caravans or persons from previous encounters. I am aware the Forestry Commission were responding to this encampment.

59. I downloaded the relevant vehicle video recording onto a disc that is shown to be as **[Exhibit SE55]**.

60. From this recording I took the following screen shots:-

- The caravans located within the car park as you approach from the main entrance, shown to me as **[Exhibit SE56]**;
- The pile of waste prior to the grass area, shown to me as **[Exhibit SE57]**;
- The eight piles of waste behind the tree surrounding the car park, shown to me as **[Exhibit SE58]**;
- A close up of the piles of waste, shown to me as exhibit **[SE59]**;
- The pile of waste prior to the grass area, showing the proximity to the caravans, shown to me as exhibit **[SE60]**;
- The main entrance showing the post and partial gate on the grass bank, shown to me as **[Exhibit SE61]**.

61. On 07 May 2018 at 13:37 I re-attended Berwick Woods, Berwick Pond Road. The car park had been closed and the gate permanently locked since the Travellers were removed on behalf of the Forestry Commission.

62. Using my phone at 13:57 videoed the waste deposited on the land which is shown to me as **[Exhibit SE/62]**

Como Street – 10 March 2018 to 17 March 2018

63. This unauthorised encampment took place at Como Street Car Park Como Street, Romford, RM7 between Saturday 10th March 2018 and Saturday 17th March 2018.
64. Como Street car park is a pay and display car park which has 180 spaces and is open 7 days a week, 24 hours a day. Access into the car park is only possible from Como Street. I produce a map of the car park shown to me as **[Exhibit SE/63]**.
65. On Saturday 10 March 2018 at about 14:15, I was on mobile patrol, driving a marked vehicle in company with PC Gary Carr when we received a call from Romford Police. We were informed that Travellers were entering a council car park in Como Street. At about 14:28 we entered the car park and found nine (9) caravans and vehicles parked up.
66. We spoke with the occupants and established they were all French speaking, all related, and the family name provided was GURGIN.
67. We identified Carlos who could speak English and he told us they wanted to stay a week. Carlos further stated in previous years, they had stayed on this site and a court order had taken a week to obtain.
68. He explained, in broken English, that one of the ladies within the group was heavily pregnant, had high blood pressure and needed complete rest, and the baby was expected within the week. We advised them of the location of the nearest hospital, which was Queens Hospital Romford, should they need to see a Doctor. He informed us approximately twelve (12) to thirteen (13) children

between the ages of 2 to 15 years resided within the caravans.

69. I recorded the index plates of both the caravans and vehicles within the car park in my pocket book, pages 34 - 36, a copy of the pages is shown to me as [Exhibit SE/64]. Details of the vehicles are as follows;

- A TABBERT Puccini caravan index RA AY 350 attached to a Black SEAT, Estate index EQ-827-NN.
- A TABBERT caravan index BF-607-RW attached to Grey PEUGEOT 407 index BS-231-JX (pregnant lady residing in this caravan).
- A TABBERT Majestat caravan index RAVE 138.
- A LUNAR caravan index ET-700-WM with a Green MERCEDES index ET-700-WM.
- A TABBERT Puccini caravan index DY-956-XB.
- A FENDT Diamant caravan index CM-682-QX.
- A LMC Exquisit VIP 655 caravan index AV-959-AS attached to a Brown
- VOLVO Estate D5 index NK EA 32.
- A TABBERT Puccini 650 caravan index EJ-938-HK.
- A SWIFT Corniche 15/2 caravan index 472 ADC 67.
- A Maroon MERCEDES ML500 index NK DM724.
- A Grey MERCEDES AMG index RV 5122.
- A Silver MERCEDES Estate index EF-854-VD.

70. A Court Order was obtained to remove occupants from car park

Lessa Open Space – 13 March 2018 to 15 March 2018

71. This unauthorised encampment took place at Lessa Open Space on Tuesday 13 March 2018 until Thursday 15 March 2018.

72. Lessa Open Space, Wymark Close, Rainham, RM13 SSW is an open space with ample room for informal recreation and has play equipment for children of all ages including a large multi-use

games ball court.

73. I produce a map of the open space shown to me as **[Exhibit SE/65]**

74. On Tuesday 13 March 2018 at about 16:30 I received a phone call from the Parks Department, informing me about twenty caravans had entered Lessa Open Space. At 17:19, I attended the location in company with Kenny WILKS, Enforcement Group Manager, to engage with the Traveller Group. I counted at least twelve(12) caravans within the open space.

75. From the vehicle video camera, I downloaded the journey to the site and leaving the site. From this footage, I took two still photographs, the first showing the vehicles and caravans in the open space on the approach road in the residential estate and a further still photograph from the open space gates showing the vehicles and caravans.

76. I produce these two still photographs shown to me as **[Exhibit SE/66 and SE/67]** respectfully.

77. From the footage, the following registrations are clearly seen.

- MV14NWW attached to a white Peugeot van.
- NL60FAU attached to a caravan.
- DS63LCO attached to Grey Vauxhall Astra .
- SE64SVA attached to a white Fiat 500.
- KN66XAF attached to a silver VW Golf.

78. This open space was not subject to Byelaws and as a result arrangements were in place to serve a section 77 Notice on the group to vacate the site, however prior to service the Police acted using their s.61 powers.

79. On Wednesday 14 March 2018, the Police served a section 61 Notice under CJPOA 1994 on the group to leave the site by 13:00 on Thursday 15 March 2018.

Unit 1, international Industrial Park, New Road, RM13 8RH – 30 March 2018 to 9 April 2018

80. This unauthorised encampment took place at Unit 1, International Industrial Park, New Road, Rainham RM13 8RH.

81. Access into Unit 1 is only possible from Manor Way. I produce a map of the location of the Industrial Estate including Unit 1 shown to me as [Exhibit SE/68]. On Friday 30th March 2018 at about 10:40, I was in full uniform, on mobile patrol, driving a marked vehicle in company with PC Carr and Kenny Wilks, Enforcement Group Manager when we arrived outside Unit 1, stopping in New Road. Five (5) caravans were parked within the site with vehicles.

82. PC Carr, using his mobile phone, took a photograph at 10:40, of the piles of rubbish deposited next to the caravans within unit 1, shown to me as [Exhibit GC/9].

83. We then drove up New Road and turned left into Manor Way to find out the access route into Unit 1. As we drove down Manor Way and took a sharp left towards the Industrial Estate, parked up on our right, were two caravans and two (2) Transit vans. We continued into the Industrial estate and drove up to the entrance of Unit 1. Two (2) unattended Ford Transit flat beds were parked and unattended on either side of the entrance, only

one displaying a front number plate that read P739NOG.

84. We reversed back down the road and made our way out of the Industrial Estate, passing the two Ford Transits registration numbers VUI9541 and MV170XH that were parked with two caravans in Manor Road. We turned right into New Road and as we passed Unit1, I saw a Transit flat bed with its tail gate up and piles of rubbish sliding out of the back of the vehicle onto piles of rubbish already deposited. I was unable to see the driver or any registration number. Unfortunately, we were unable to intervene.

85. I downloaded the relevant vehicle video recording and from this recording, I took the following screen shots:-

- The two Ford transit flat beds by the entrance to Unit 1 that I produce and is shown to me as **[Exhibit SE/69]**;
- The silver Ford Transit VUI 9541 parked in Manor Way that I produce and is shown to me as **[Exhibit SE/70]**;
- The Grey Ford Transit MV170XH parked in Manor Way that I produce and is shown to me as **[Exhibit SE/71]**;
- The Flat bed, tail gate up, depositing rubbish onto the site that I produce and is shown to me as **[Exhibit SE/72]**;
- The same flat bed, tail gate up, depositing rubbish onto the site that I produce as **[Exhibit SE/73]**.

86. From the time of PC CARR's photograph showing the extent of the fly tipping on the site at **[Exhibit GC/9]**, to us driving around to the entrance to unit 1, approximately 4 minutes and our return back to the front of the site in New Road, another four minutes, when the flat bed is depositing its rubbish, the two cars shown in the photograph, parked next to two caravans had moved.

87. This has allowed the flat bed access to the fly tipping area and would suggest, the owners of those cars have facilitated the dumping of that waste on the site.

88. On Saturday 31 March 2018 at approximately 08:21 I was in New Road, Rainham when I drove past Unit 1 and recorded the caravans, vehicles and waste within the site. I downloaded the relevant vehicle video recording and from this recording, I took three screen shots of the site that are shown to me as **[Exhibits SE/74, SE/75 and SE/76]**.

89. On Friday 6th April 2018 at approximately 11:27, I was in company with PC CARR, when we attended Manor Way to check out a report of a fly tip, believed on railway land. On the same day at the sharp left hand bend in Manor Way, where the two caravans were situated, there was a large fly tip, not on the railway land but besides the caravans.

90. We attended the entrance to Unit 1, where only two caravans were now situated within the unit and one caravan parked next to the entrance. I downloaded the relevant vehicle video recordings and from these recordings, I took the following screen shots:-

- A screen shot of the fly tip, next to the railway line shown to me as **[Exhibit SE/77]**;
- A screen shot of caravan index plate VUI 9129 parked outside entrance to Unit 1 that I is shown to me as **[Exhibit SE/78]** .
- A screen shot of the only two caravans now left in Unit 1 that is

shown to me as **[Exhibit SE/79]**;

- A screen shot of a white Toyota index IFZ 3026 and caravan parked in Manor Way that is shown to me as **[Exhibit SE/80]**;
- A screen shot of a Transit index P739NOG, fully laden, parked in Manor Way that is shown to me as **[Exhibit SE/81]**;
- A screen shot showing the fly tip, the two caravans and Transits index VUI 9541, MV170XH that is shown to me as **[Exhibit SE/82]**

91. On Saturday 7 April 2018 at 13:10, I was in company with PC CARR, when we attended the entrance of Unit 1 International Industrial Park, New Road, Rainham RM13 8RH. No caravans were now within the unit because it had been completely filled with waste material. Immediately outside the unit were two caravans, one showing index VUI 9129.

92. I downloaded the relevant vehicle video recording and from this recording I took a screen shot of the two caravans which is shown to me as **[Exhibit SE/83]**.

93. On Monday 9 April 2018 at 11:34 I attended Creekside, an industrial plot approximately 330 metres from Unit 1 and found all the caravans and vehicles were now on this site. I produce a map showing the location of unit 1 and the new location in Creekside shown to me as **[Exhibit SE/84]**

Cockney Gent Public House 27 March 2018 to 31 March 2018

94. This unauthorised encampment took place at The Cockney Gent Public House, Petersfield Avenue, Harold Hill Essex RM3 9PB.

95. On Saturday 31 March 2018 at approximately 08:12 I received a phone call from the out of hours Council switchboard informing me that they had received a call regarding Travellers on The Cockney Gent Public House reference, T-1828880, relating to fly tipping and noise.

96. I informed the switchboard that I was aware of the incursion. The encampment had arrived on the 27th March 2018 and the private owner of the land was aware of the issue.

97. At 08:51:48 on 31 March 2018 I attended the location and using the vehicle video camera obtained some footage of the three caravans within the site. I also took a screenshot of the three caravans which I produce and is shown to me as [Exhibit SE/85] I could not see any obvious fly tipping taking place at this time. This was private land and I do not have information as to how or when the encampment finally left.

Grenfell Park – 17 November 2017 to 19 November 2017

98. This unauthorised encampment with associated fly tipping took place at Grenfell Park, Rush Green Road, RM12 4DV, between Friday 17th and Sunday 19th November 2017. This Park has a play site for children with inclusive play equipment and a field for informal recreation.

99. The Park runs alongside the River Rom, much of the Park area is

used for conservation purposes with links to The Chase Nature Reserve. I produce a map of the Park shown to me as **[Exhibit SE/86]**.

100. I also produce a photograph of the entrance to the Park as Shown to me as **[Exhibit SE/87]** and a further photograph of the vehicle barrier gate entrance shown to me as **[Exhibit SE/88]**

101. I will also be referring to the carpark at Tesco Extra store, 300 Hornchurch Road, Hornchurch, RM11 1PY, which is opposite the Grenfell Park site. I produce a Google map showing the proximity of the store to Grenfell Park shown to me as **[Exhibit SE/89]**

102. On Friday 17 November 2017 at 23:15, Havering out of hours call centre started to receive phone calls, informing them that Travellers had entered Grenfell Park. On Saturday 18 November 2017 at 10:25, I was deployed with PC CARR to Grenfell Park as a result of this Traveller incursion. Upon our arrival at the vehicle barrier gate, we found that the gates padlock had been removed and replaced with a wire combination lock. I produce a photograph of the view front the Park vehicle barrier gate towards the caravans and vehicles within the Park which I produce and this is shown to me as **[Exhibit SE/90]**.

103. We walked into the Park in the direction of the caravans and were met by three males. A conversation took place between us that I recorded on my body camera. Within this conversation they stated there were ten (10) separate families and eleven caravans and gave a family name of 'STOKES'. They stated they were jet washers and they didn't dump rubbish. The date and time

displayed are wrong on the footage for reasons unknown, however I clearly state the date and time on the recording. I produce this footage on disc and shown to me as **[Exhibit SE/91]**

104. During this conversation I served notices, pursuant to byelaws, on the males to vacate the Park by Sunday 19 November 2017 at 4pm. I produce a copy of the notice which is shown to me as **[Exhibit SE/92]**.

105. We returned to our vehicle and the males removed their lock from the Park vehicle gate and it remained off for the duration of their stay. We drove through the vehicle gate into the Park, the only vehicle access, passed their vehicles and caravans and headed towards the back of the Park which is a conservation area.

106. At 10:48, I recorded on my body camera, six piles of rubbish that had been dumped in the conservation area of the Park which I produce on a disc and is shown to me as **[Exhibit SE/93]**. I took two (2) screen snapshots from **[Exhibit SE/93]** showing the piles of rubbish which I produce and are shown to me as **[Exhibits SE/94]** and **[Exhibit SE/95]**. Whilst at this location, I received anonymous information from a member of the public that a fly tip had taken place after 09.30 that morning, no other details supplied.

107. As we returned to the vehicle gate and during our time within the Park, we recorded details of the vehicles and caravans which I produce as **[Exhibit SE/96]**.

108. We remained at the entrance to the Park for most of the day to prevent any further fly tipping within the Park and to reassure the local residents and Park users. Whilst at this location, I

attended Shurgard Self Storage Unit, situated along the access route into the Park and made an appointment to view their CCTV in an effort to identify the vehicle involved in that morning's fly tip. At 12:30 I examined their CCTV and on 18/11/2017 at 09:56:28 a Transit flatbed NL06GXB loaded with waste is seen driving along Rush Green Road and seen in the access road leading into the Park.

109. Clearly visible in the back of the flatbed are two bright yellow poles lying amongst the waste.
110. Using my phone, I took a series of screen shots of the CCTV images of the vehicle which I produce and are shown to me as **[Exhibits SE/97 to Exhibit SE/100]**.
111. At 12:58 I examined the fly tips within Grenfell Park and again using my phone took a picture of the pile of waste showing the two yellow items, two plastic pipes. I produce this photo which is shown to me as **[Exhibit SE/101]**.
112. From the on board vehicle camera, I downloaded two (2) segments of video recording onto a disc showing our vehicle journey from the fly tips in the conservation area of the Park back towards the vehicle gate, the only vehicle access, passing other fly tips and driving through the static caravans and vehicles. The date and time displayed on the footage shows 04/01/2000, 19:51 and 04/01/2000, 19:56, file names 1950240.MOV and 19560241.MOV respectively. I produce the video footage shown to me as **[Exhibits SE/102] and [Exhibit SE/103]**.
113. From **[Exhibit SE/102]**, I took a screenshot showing the proximity of a large flytip to the static caravans and vehicles which

I produce and is shown to me as [Exhibit SE/104].

114. At 14:50, whilst parked up in the Park, we were joined by two males in a White Traffic van, registration number 151-C-11576. After a brief conversation, I handed them both a copy of the byelaw Notice to leave by 4pm on 19 November 2017. From the on board vehicle camera I downloaded the video of this meeting onto disc, (no sound). The date and time displayed on the footage shows 04/01/2000; 21:46:23, file name 21460263.MOV. I produce this footage which is shown to me as [Exhibit SE/105]
115. On Sunday 19 November 2017 at approximately 09:30, PC CARR and myself, again attend Grenfell Park and just prior to our arrival, again anonymously received information that a fly tip has taken place within the Park in the last 20 minutes. We checked the park and found another fly tip in the bushes very close to the static caravans.
116. We parked up close to the vehicle access gate and again I made enquiries of the storage unit to examine their CCTV, however they were unable to grant me access, so I arranged to view it on another day.
117. As a result of further enquiries, on Sunday 19th November 2017, I attended Tesco Extra car park, 300 Hornchurch Road, Hornchurch where I found the Ford Transit flat bed, index NL06GXB locked and unattended.
118. At 10:51, using my phone, I took a photograph of the front of the vehicle including the registration number which I produce and is shown to me as [Exhibit SE/106] At 10:52, I took a further photograph of the passenger mirror, held together with grey

masking tape, which I produce and is shown to me as **[Exhibit SE/107]**. In three other areas of Tesco car park, locked and unattended were three further Transit open back vehicles, registration numbers EF04PUH, HV03BNK, FJZ6942. At no time whilst we were in the Park did these four vehicles visit.

119. We returned to Grenfell Park, where we remained on site until the Travellers all left the Park as agreed at 15:43. We secured the gate and blocked access into the park using large boulders, aware the four (4) open back Transits were in the Tesco car park.

120. On Monday 20th November 2017 at 09:51 I again attended Grenfell Park and took three further photographs of the waste pile showing the yellow plastic pipes which I produce and are shown to me as **[Exhibit SE/108]**, **[Exhibit SE/109]** and **[Exhibit SE/110]**

121. At 11:28 at Tesco Extra car park, 300 Hornchurch Road, Hornchurch, vehicle NL06GXB, concerned in fly tipping was seized by myself using powers under s34B Environmental Protection Act 1990 and removed. At this time, the other vehicles were still in situ locked and unattended. An abandoned vehicle notice was attached to the Transit FJZ6942.

122. On Tuesday 21 November 2017 at 12:26 in Grenfell Park I took five (5) photos on my phone showing the four (4) fly tips close to where the caravans were parked. These are shown to me as **[Exhibits SE/111, SE/112, SE/113, SE/114 and SE/115]**.

123. At 12:50 I again attended 'Shurgard' Self Storage Unit to view the CCTV and at 13:01 I took two (2) screen shot photographs of the empty flat bed, index NL06GXB leaving the Park at 10:05 on

the 17/11/2017. I produce these two photographs shown to me as **[Exhibit SE/116 and SE/117]**. At 13:10 I took a video screen shot dated 11:17:2017 at 23:59 showing five (5) open back Transits in Rush Green Road. I produce this shown to me as **[Exhibit SE/118]**. At 13:10 I took a further video screen shot dated 11:17:2017 at 00:00:33 showing the Ford open back Transits in the access road leading into the Park. I produce this and it is shown to me as **[Exhibit SE/119]**. At 13:18 I took seven (7) screen shot photographs of the CCTV images showing a flat bed Transit, registration EF04PUH, loaded with waste, including a glass door, drive down the access road into the Park on Sunday 19:11:2017 at 09:18 and leave the Park empty at 09:26. I produce these photographs which are shown to me as **[Exhibits SE/120, SE/121, SE/122, SE/123, SE/124, SE/125 and SE/126]**. I also produce three (3) photographs of a fly tip within the Park that has a glass door amongst the deposited waste shown to me as **[Exhibits SE/127, SE/128 and SE/129]**.

124. I returned to Tesco car park, Hornchurch Road with a view to seizing the Transit registration EF04PUH but only Transit FJZ6942 was at the location, the other two had left. I produce a map of Grenfell Park showing the locations of all the fly tips that occurred during the illegal encampment shown to me as **[Exhibit SE/130]**.

Rise Park – 18 July 2018 to 19 July 2018

125. This unauthorized encampment took place at Rise Park, on Wednesday 18 July 2018 until Thursday 19 July 2018. Rise Park, Beaulay Way, Rise Park, Romford RM1 4XH is a Green Flag Park with a pleasant area of grassland, with football pitches and a children play site with inclusive play equipment and outdoor

gym and tennis courts. There is a summer meadow and stream running through the park which provides pleasant woodland walks. I produce a map of the Park shown to me as **[Exhibit SE/131]**.

126. On Wednesday 18 July 2018 from 19:02, Parks Protection Service began to receive calls from concerned neighbours that Travellers had entered Rise Park from Beaulay Way main entrance, having removed the padlock from the inner vehicle gate. On Thursday 19 July 2018 at about 10:02 in company with PC Denham and PCSO Bates from Pettits Safer Neighbourhood Team, we attended Rise Park, so I could serve a removal notice under Park Byelaws on the illegal encampment.

127. From the vehicle video camera, I downloaded the journey to the Park and whilst in the Park and from this footage, I took still screen shots, the first showing the main entrance and car park to the park that I produce and is shown to me as **[Exhibit SE/132]**. I produce a screen shot of the inner vehicle gates, wide open, normally locked shut with a padlock, shown to me as **[Exhibit SE/133]**. I produce a screen shot of the football pitches and the caravans in the far distance of the park, within the meadow, shown to me as **[Exhibit SE/134]**. I produce a screen shot of the caravans and washing hanging from the trees as I approach from the football pitches, shown to me as **[Exhibit SE/135]**. I produce a screen shot of the caravans and vehicles in the park shown to me as **[Exhibit SE/136]**.

128. As I approached the first caravan, I was directed by the female occupant to the furthest caravan where one of the men was present. I introduced myself to the male and the reason for my visit. I handed him a copy of the removal Notice, which I produce

and is shown to me as [Exhibit SE/137] and explained to him the notice and that he had until 11am Friday to leave the park or arrangements would be made to remove him and the other caravans and vehicles. I asked him if they were individuals or a family and when he replied family, I asked the family name and he replied 'Nevin'. I gave each caravan a copy of the Notice and when asked when they had to go, told them by 11am Friday. They were all co-operative and friendly, a total of five (5) caravans were within the Park

129. The following vehicles were present in the park at the time:-

- White Peugeot index 132 LS 552;
- White Toyota van index 09 WH 1308;
- White Transit van index 11 OY 543;
- BMW 1180 index 12 OY 1611;
- Ford tipper truck index 11 MH 4613;
- Ranger caravan 07 G12 964;

130. No index plates displayed on other caravans.

131. At 16:08, I returned to Rise Park and approached the site to speak with three of the men that had not been present on my first visit. They asked about the Notice so I showed them the Notice I had served earlier and explained to them what it meant and that they had until 11am Friday to leave the park on the proviso there was no fly tipping otherwise it would be immediate. They were friendly and jovial and denied they were fly tippers. At approximately 19:00 that evening they left the park of their own accord.

132. On Friday 20 July at 07:40 I attended Rise Park and inspected the site. There was a lot of litter where the caravans had been

situated, a large fly tip of carpets and flooring in the bushes to the right of the caravans. There was soiled toilet paper and human faeces next to the footpath close to the pedestrian gate leading to Garry Close. Using my phone I took a photograph of the litter and two further photographs of the fly tip that are shown to me as [Exhibits SE/138, SE/139, SE/140] respectfully.

133. I contacted Ground Maintenance and the litter was removed that morning.

St Neot's Road, Romford, Essex RM3 9LR

134. I produce a map of the location that I produce as [Exhibit SE/141].

135. On Wednesday 8 August 2018 at approximately 20:34, I was on duty, on mobile patrol, in company with Pc Carr when we received a text message informing us that Travellers had broken the barrier of Amy's Park, St Neot's road and were setting up near the children's play area.

136. At 20:51 we arrived on scene and immediately established they were not on Park land but Council land next to the park. We recognized the group, having had previous dealings with them at Farringdon Flood Lagoon, the Morris Dancers and Amersham Road opposite. We spoke to the group of men including Kevin, their spoke person.

137. Entry had been gained to the site by pushing down a metal post which could then be pulled back up into the upright position. Eight caravans and vehicles were on the land. They were informed we would check to confirm whether the land was subject to the

previous section 78 order obtained for Amersham Road to which they responded "we checked before we came on".

138. They were informed we would return tomorrow with planning Officers to serve a section 77 Notice if that proved to be the case. I checked the previous section 77 notice issued at Amersham Road and the land was not included. On Thursday 9 August 2018 at 14:12 I attended Amersham Road and parked opposite the current incursion to await planning officers.

139. At 14:15 we entered the site and served the section 77 Notice. I produce a copy as **[Exhibit SE/142]**. I recorded the following vehicles on the land at the time of service:-

- **FJ 63 KZA**, white Vauxhall Insignia;
- **EF 17 LNX**, Black Hyundai 140;
- **11-G-7695**, Black VW;
- **06-DL-7918**, White & blue Ford Transit;
- **06-D-41323**, White Ford Transit;
- **03- WW-11169**, Ford flat bed Transit;
- **03- C-22716**, Red Ford Transit;
- **03-WW-11169**, Lunar Clubman caravan;
- **YC 11 BWB**, Sterling Elite caravan;
- **05-G-2011**, Elddis Ramble caravan;
- **12-D-1249**, Sprite Quattro caravan;
- **06-DL-7918**, Lexon 540 caravan;
- **No index**, Abbey GTS caravan;
- **No index**, Sterling Belvoir;

- **No index, Bessacarr Cameo caravan.**

140. From the vehicle video camera, I downloaded the footage from the time I parked in Amersham Road and whilst I accompanied the planning officers on the site to serve the section 77 notice.

141. From this footage I took a screen shot of the site which I produce as [Exhibit SE/143] and a screen shot of myself and planning officers going onto the site to serve the section 77 notice that I produce as [Exhibit SE/144].

Clematis Close, Harold Hill

142. On Saturday 11 August 2018, this group of Travellers left St Neots Road and went and parked on a grass area in **Clematis Close, Harold Hill**. On Friday 17 August 2018 a section 78 Notice was served on the group to leave the land by 12 noon the next day. On Saturday 18 August at 11:35am I was at the location when they left the site. Unfortunately, they drove about 100 metres into Briars Road where they all parked on the grass verge.

Briars Road, Harold Hill

143. On Monday 20 August 2018 at approximately 11:14 I was present when planning Officers served a section 77 Notice on the group to leave the land on or before 12 noon on Tuesday 21 August 2018. They disregarded this notice and remained on site. Arrangements

were in hand to obtain a section 78 but on Saturday 25 August 2018 the Travellers left of their own accord from the site.

Bedfords Park

144. This park is one of Havering's largest parks and has achieved Green Flag status since 2007. It is a site of Metropolitan Importance for Nature Conservation and designated as a local nature reserve. Sites of Metropolitan importance for Nature Conservation are those sites which contain particularly rare species, rare assemblages of species or important population of species, or sites which are of particular significance within otherwise heavily built-up areas of London.
145. It is home to a herd of captive red deer which are a popular attraction. The extensive grounds of meadow and mature woodland provide a variety of walks and the opportunity to bird watch. There is an impressive visitor's centre which is run by the Essex Wildlife Trust
146. I produce a map of the location that I produce as [Exhibit SE/145].
147. On Sunday 26 August 2018 at approximately 17:25; I was on duty, on mobile patrol, in company with Pc Carr when we received a telephone call informing us that a large number of Traveller caravans were driving past Havering-atte-Bower village green and were turning into Broxhill Road heading in the direction of Bedfords Park.
148. At 17:30 we arrived in Bedfords Park to find the vehicle barrier gate within the large car park was wide open and a large number of

caravans and vehicles were parked across the grass area.

149. We established who the spokesperson for the group was and he informed me he knew the law, because it was council land, the council would have to serve a 77, before a section 61 could be issued. They had five pregnant ladies on site and requested the Welfare and the Traveller's liaison officer visit the site, their intention was to remain as long as possible.
150. He stated they had come a long way to carry out work throughout the Borough. They were from the Birmingham area and we estimated there were 15-20 caravans as we left the site.
151. On Monday 27 August 2018 at approximately 09:50am in company with PC Carr we attended Bedfords Park and entered the Travellers site. I again spoke with the spoke person Bobby and I explained the law relating to section 77, section 78, section 61 and then explained the Byelaw offences within the park and our power to deal with breaches. I then showed him the notice directing them to remove their vehicles and caravans. At his request, I read the notice to him informing him he had until 12 noon tomorrow to leave the site. I then served him twenty notices and they were delivered to every caravan. I produce this notice as **[Exhibit SE/146]**.
152. I asked him if the families were all related and he replied extended family, uncles, cousins. I asked the family name and he replied 'Price'. I counted sixteen (16) caravans on site. I recorded the following vehicles on the land at the time of service in my pocket book, pages 82 & 83 that I produce as **[Exhibit SE/147]**:-

BA66CXW, Ford;

NJ62OTB, Ford Transit+ Le Vogue caravan;

WP59BYK, Focus;

EX59XVE, Ford +fendt caravan;

BV14VDP, Caravan;

MK08EYA, Smax silver;

BJ18BVO, Merc 180;

SN17OGL, Ford lorry + caravan;

FP63EVT, Red Ford Focus;

SL62FJZ, Lorry + caravan Le Vogue;

SF64URK, White Ford van;

NU17XGO, lorry + caravan;

BX63VVE, Ford + caravan;

BG65EHR, Caravan;

SH62XAW, Merc;

EJ02ORD, Ford van;

YM12FHO, Caravan;

HV60TTU, Caravan;

153. I produce a photograph of the open inner vehicle gate and the caravans as **[Exhibit SE/148]**. I produce a photograph of the illegal encampment as **[Exhibit SE/149]**.

154. On Tuesday 28 August 2018 at 09:32 I attended Bedfords Park and upon entering the site there were two new caravans that

arrived yesterday. I spoke with the occupants and both served Byelaw Notice to leave by 12 noon. The following two vehicles were parked outside caravans:

06-C-19823, Grey Peugeot;

SL62MFJ, White Nissan 4x4;

155. I spoke with Bobby, site spokesperson and we agreed they would leave site voluntary by 6pm tomorrow. On Wednesday 28 August 2018 at 15:20 seventeen (17) caravans and vehicles left the park and at 16:00 the last remaining caravan was picked up and left the park. I closed the park to vehicle traffic and then returned to examine the site.

156. I produce three photographs showing numerous piles of fly tipped branches and rubbish as **[Exhibit SE/150, SE/151, and SE/152]**.

157. In the small wooded area on the slope were at least three areas where baby wipes had been discarded. I produce a photograph showing discarded wet wipes as **[Exhibit SE/153]**.

158. In the wooded area between the deer pen and the travellers site, I found eighteen different (18) places of discarded wet wipes and faeces.

159. I produce three photographs showing three of those areas as

[Exhibits SE/154, SE/155, and SE/156].

160. The following additional vehicles left the site:

GX15RDU, Ford white Drop back van;

YS61GGF, Ford Fiesta

PX58XPL,

HJ17WXE,

LM15XHK, White Transit;

DU15FNN, Silver Transit;

HF67XCT,

GY16XHK, White Transit,

BN08LWZ, White Transit

161. I believe that the facts stated in this witness statement are true.

Signed:



Debra Edwards 1972

Name:

Date: 28.07.2018

Claimant: London Borough of
Havering
First.
Exhibits: JJ1 – JJ20
Date:

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF JOHN JONES

I John Jones, a Parks Police Officer, in the employment of the London Borough of Havering based at The Lodge, Romford and will say as follows:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014, against the above named Defendants. The facts stated in this statement are within my own knowledge unless stated otherwise. Those facts outside my own direct knowledge are true to the best of my knowledge and belief. In my current position I am responsible for Policing the

Borough Parks and Open Spaces by enforcing pleasure ground byelaws and other relevant criminal and traffic legislation.

2. On 22nd October 2015 at 12:49 pm I attended private land in the ward of Rainham and Wennington to monitor an eviction to ensure the Travellers did not move onto Council owned land. I exhibit IRIS Report 20854 as **JJ/01**.
3. On 23rd May 2016 at 12:41 pm I attended to an unauthorised encampment on land in the ward of South Hornchurch. I completed a vehicle check on the Police National Computer on one of the vehicles and the result was the UK plate had been revoked and the true index should be VUI 8556. I carried out hourly visits. I exhibit IRIS Reports as 23388 as **JJ/02**. I noted one of the defendants, namely Christopher John Stokes, was present at the site.
4. I can see from IRIS Report 23479 that on 13th June 2016 PC Jones 146KP arrived at 13:40 pm to an unlawful traveller encampment at Rainham Creekside Path where there were 6 caravans just arrived at Lamsons Lane. There was no police presence and the vehicles were all on footpaths. I exhibit IRIS Report 23479 as **JJ/03**. I arrived at Rainham Creekside Path at the same time. There was no police presence and the vehicles were all on the footpaths. I exhibit IRIS Report 23479 as **JJ/04**.
5. On 17th June 2016 at 18:32 pm I arrived at Rainham Creekside Path to undertake a sit visit. I exhibit IRIS Report 23524 as **JJ/05**
6. On 18th June 2016 at 20:47 pm I arrived at the same location and noticed the travellers had left. I exhibit IRIS Report 23540 as **JJ/06**.
7. On 20th June 2016 at 12:51 pm I attended an address in the ward of Rainham and Wennington and saw 15 caravans at the location. I exhibit IRIS Report 23545 as **JJ/07**.

8. On 29th June 2016 at 9:37 am I arrived at Rainham Creekside Path to find 12 Caravans with the Vehicle Registrations SA16 LZW, NE03MPY,FG02WRT. I exhibit IRIS Report 23608 as **JJ/08**.
9. On 7th July 2016 at 14:58 I arrived at Rainham Creekside Path to undertake a site visit, I exhibit IRIS Report 23722 as **JJ/09**.
10. On 10th July 2016 at 11:50 I arrived at an address in the ward of Brooklands. I attended with PO Foxon and followed 3 caravans onto St. Edwards Way. There are 17 caravans on the site. The police were informed about the incursion. I exhibit IRIS Report 23768 as **JJ/10**.
11. On 11th July 2016 at 13:35 I arrived at North Hill Drive Open Space to undertake a site visit and was informed by the travellers at the location they would be leaving the next day. I exhibit IRIS Report 23786 as **JJ/11**.
12. On 12th July 2016 at 09:00 I arrived at Central Park to undertake a site visit. I exhibit IRIS Report 23792 as **JJ/12**.
13. On 11th July 2016 at 08:30 I arrived at Central Park to undertake a site visit. I exhibit IRIS Report 23795 as **JJ/13**.
14. On 16th July 2016 at 14:02 I arrived at Chudleigh Road Open Space to undertake a site visit. I exhibit IRIS Report 23843 as **JJ/14**.
15. On 17th July 2016 at 10:58 I arrived at Chudleigh Road Open Space to undertake a site visit. I exhibit IRIS Report 23886 as **JJ/15**.

16. On 7th August 2016 at 20:00 pm I arrived at Bedfords Park and saw a Volkswagen transporter , Irish travellers sitting up in car park, who then moved as we got closer to them. They also moved to a second car park. I exhibit IRIS Report 24059 as **JJ/16**.
17. On 20th March 2016 at 10:50 am I arrived at an address in the ward of Rainham and Wennington. I reported seven caravans in area of Rainham marshes, carrying out search of area. I located a traveller encampment on Rainham marsh land on the A1306 New Road. The Metropolitan Police were informed via 101 CAD number 4494 and 4581 refers to these incidents. I exhibit IRIS report 24874 as exhibit **JJ/17**.
18. On 22 April 2017 a call was received that there was an unauthorised encampment at Cottons Park. Various calls were received thereafter with reports that the encampment had moved to King George's Playing Fields and then to Rise Park. I attended each location but with no trace.
19. On 15 June 2017 I attended Chudleigh Road Open Space and noted 5 caravans on site. The occupants explained they would leave only with a Court order.
20. On 23 June 2017 there were a series of calls reporting concerns that there were unauthorised encampments about to enter land at Having Village Green. Eventually the encampment arrived at Havering-atte-Bower cricked club, where eviction proceedings were undertaken. The encampment then moved to Havering Village Green, with Parks Police position vehicles to prevent access to the Green. The encampment was deterred and eventually settled within the London Borough of Barking and Dagenham, at Central Park.
21. On 3 July 2017 I attended Gooshays, where there was a single caravan with 5 children aged 15,11,9, 2 and 3 and 2 adults.

22. On 4 July 2017 I attended Heaton where there were two caravans occupied by a family identified as 'O'Brian'. There were many children and severe dumping in the nearby stream. Specialist clear up was necessary as street cleansing could not deal with the substantial dumping including builders waste.
23. On 5 July 2017 I attended Gooshays where there were caravans camped on a grass verge at Whitechurch Road. Building debris had been fly tipped behind the caravan into the nearby woods.
24. On 6th July 2017 at 8:47 am I arrived at Wincanton Road Open Space and noted that the travellers had moved from Wincanton Road. I exhibit IRIS Report 28211 as **JJ/18**.
25. On 6th July 2017 at 8:56 am at Chudleigh Road Open Space and noted Section 61a form had been issued by Stephen Rawlins. I exhibit IRIS Report 28212 as **JJ/19**.
26. On 6th July 2017 at 8:09 am I arrived at Myrtle Road Open Space and noted that the travellers had left the location at 11:15 a.m. and had moved to Briar Golf Club Green in Brentwood. I exhibit IRIS Report 28213 as **JJ/20**.
27. On 13 July 2017 I attended Collier Row Recreation ground following reports of an unauthorised encampment. A s.77 notice to leave was issued.
28. On 24 August 2017 I attended Brittons Playing Field. There were 9 caravans present and the green barrier had been cut to allow entry. Bollards had been removed along with the height barrier. Also on this date there were reports of an encampment at Rise Park with threats to stab youths.

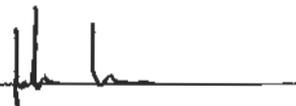
29. On 26 August 2017 a call was received from Metropolitan Police regarding a large group of travellers attempting to gain access to Harrow Lodge Park. After the site was pre-emptively secured, the travellers became abusing and blocked Hornchurch High Street with approximately 9 caravans. This group then moved to the 'Three Travellers Pub' in Dagenham on 27 August 2017. They were evicted from this area and tried to return to Harrow Lodge Park but access was secured. The group then moved to Hornchurch Country Park and ultimately settled at the Tesco Car Park.

30. On 14 September 2017 I attended Tesco Goodmayes. There were 20 caravans and bailiffs on site.

31. On 18th November 2017 I attended Grenfell Park. There were 11 caravans and notices to quit had been issued.

Statement of Truth

I believe the facts stated in this witness statement are true.

Signed: 

John Jones

Dated: 17.2.19.

Claimant
D Colwill
First
Exhibits: DC1-13
Date: 29.10.18

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

**WITNESS STATEMENT OF
DAVID COLWILL**

I David Colwill, a Planning Enforcement Manager, in the employment of the London

Borough of Havering based at Mercury House, Romford and will say as follows:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014. The facts stated in this statement are within my own knowledge unless stated otherwise. Those facts outside of my own direct knowledge are true to the best of my knowledge and belief.

2. I am currently employed as the Team Leader for Planning Enforcement and Appeals at the London Borough of Havering based at Mercury House Mercury Gardens Romford RM1 3SL. My duties on top of managing the day to day operations of the team include the investigation of alleged breaches of planning controls. I act as authorising officer for the issue of statutory notices against alleged offenders and undertake certain investigations alone or in conjunction with team members. The Planning Enforcement Team has been given the role of reacting and responding to traveller incursions on Council owned land and has on a regular basis recently had reason to serve Notices under Section 77 of the Criminal Justice and Public Order Act (the Act) (1994).

3. The Spring of 2018 has resulted in a high number of reports of unlawful encampments into the land controlled by the London Borough of Havering. Several of the encampments were recorded as the same group of travellers whom would move from one site to the next following service of S77 Notices of the Act in order to frustrate LBH attempts to move travellers on. Such techniques are highly time consuming and one recent example is a group of 4-5 traveller vehicles on sites I personally attended with other Officers of the Council.

4. One such incursion commenced at the Queens Theatre Car Park, Billet Lane, Hornchurch between February and March 2018 where a group of 4-5 traveller vehicles encamped on the land. The Queens Theatre site was subsequently protected by large concrete blocks to prevent repeat or new encampments.

5. The group left the land but moved onto a small area of green space land opposite the site on Wedlock Close adjacent to the Telephone Exchange. A S77 Notice of the Act was served by hand by Mr Onkar Bhogal on 5th March 2018. Legal Services were contacted for support.

6. On the 6th of March 2018, a site visit by Mr Sager Perwez (Planning Enforcement & Appeals Technician) confirmed that the travellers had left the

land but had left a quantity of rubbish including rubbish bags and a number of gas canisters.

7. The same group of travellers were confirmed by external emails from John Jones in Havering Parks Constabulary to have moved to the Front Lane Public Car park, adjacent to 69/75 Front Lane, Upminster. I attended the site with officers from parks Police along with Onkar Bhogal and Steve Lomas (Planning Enforcement & appeals Technician) on the 9th of March 2018 from 12:30pm to 1:30pm.
8. I went on annual leave after the 14th of March 2018 and other officers within the Planning Enforcement Team eventually served a S77 Notice by Onkar Bhogal and the travellers were confirmed to have left the site by the 23rd of March 2018. I produce and am shown this as **Exhibit DC10**
9. This series of encampments had a huge resource and reputational impact on LBH as various officers from the Planning Department, parks police undertook multiple site visits whilst the direct cost of contracting bailiffs was incurred. Furthermore, there was loss of revenue from a Council operated pay and display carpark and reputational damage to LBH due to the difficulty in exercising the powers available and the ability of the travellers to simply move on to a nearby site upon service of a notice or threat of further action following a S77 notice.
10. This incursion utilised a high number of Planning Enforcement officer hours and took team members away from their primary role of investigating and remedying breaches of planning controls.
11. A separate traveller encampment occurred at the Viking Way Public Car park, Rainham which was brought to the attention of Planning Enforcement by parks Police on the 21st of February 2018. Before a site visit could occur, I was advised by Kenny Wilks (Parks Police) that the travellers had left the site

at some point either late on the 21st of February or on the 22nd of February. However, I was advised that a new group encamped, or the same group returned, from the 25th of February.

12. I visited the site on the 27th of February 2018 along with Steve Lomas, Sager Perwez, Kokoete Ekanem (Planning, Enforcement & Appeals Technician), Kenny Wilks and 4 Officers from the Metropolitan police. Several of the traveller vehicles had left upon sighting Police vehicles and for the next approximately hour and a half, I witnessed the traveller vehicles leave the site. One vehicle left not through the car park entrance but by driving over the un-dropped kerb which resulted in my later referral to another Council department to have this site protected by physical barriers.
13. This incursion again resulted in many officer hours being dedicated to a response and the involvement of the Metropolitan Police, and the subsequent cost of physical barriers to protect the site.
14. The travellers also left the area in an untidy state with rubbish, alcohol cans and bottles left strewn around the ground. I produce and am shown these photographs as **Exhibit DC11 and DC12**. A loss of revenue was suffered due to the inability of members of the public to utilise the car park during this time.
15. A number of other traveller incursions have occurred recently including a group of French travellers which camped within the Como Street car park from the 12th of March 2018 and were confirmed as having left by the 21st of March 2018. I attended site and along with Sager Perwez, served S77 notices on the 13th of March 2018. Again, the site visits, coordination of resources, issue of notices and contact with the legal department forewarning of court time required all demanded a high number of officer hours.
16. The overall impact of the various incursions has been highly negative and is at a high cost to the Council and public money. A high level of officer time is

required for any incursion onto public land and this takes officers away from their core function of investigating breaches of planning control. Additional costs have been that of loss of revenue to car parks and the engagement of bailiffs.

17. Given that Police can often not use their powers under Section 61 of the Act, Police are unable or unwilling to lead on such incursions however the issue of S77 notices is often ignored by travellers until a summons is issued. This is an inefficient use of Council time and resources.

18. The Planning Enforcement Team had reports from a local resident called and from Police of an unlawful encampment on a piece of land known as Painsbrook Open Space, Painsbrook Way which is in between Amersham Road, St Neotts Road and Paines Brook Way from Monday 11th of June 2018. Gary Carr (Parks Protection Officer) attended the site at 5pm on Monday 11th June and served a Section 77 Notice which I produce and am shown as **Exhibit DC13**. The notice, which is exhibited as evidence, directed the travellers to vacate the land immediately and to not enter the land again within 3 months of the date of the Direction. The notice included details of the nearby hospital and how to get there. There were no issues raised to us in regards to health or social care.

19. On Wednesday 13th June 2018 at 10:00 a.m., I visited the site with Patricia Adesina (Planning Enforcement Officer), and found that seven caravans and a further 9 supporting vehicles have remained on the site and have not complied with the Direction of the S77 Notice. After confirming the details we left the site. I took 9 photos and these are produced and shown to me as **[Exhibit DC 1 through to DC 9.]**

20. Thames Magistrates Court gave order for S78 on Thursday 14th June 2018. Along with Planning Enforcement Colleagues Onkar Bhogal and KFINALokoete Ekanem and Steve Edwards from Parks Police, we collectively hand served the summons on every caravan which the

occupants accepted. The individuals were unnamed. We also attached 2 copies of the summons to lampposts adjacent to the site, along Amersham Road. We left the site at approximately 5pm. Travellers left the site at some point during the evening of the 15th or 16th of June 2018 without the need for bailiffs, and this was confirmed by Enforcement Manager Kenny Wilks. However the travellers then moved to another nearby site in Gooshays Drive which colleagues then dealt with the removal of.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: David Colwill

Name: David Colwill

Date: 29 October 2018

Claimant: LB of Havering
David Colwill
Second
Exhibits: DC2.1
Date: 31.07.2019

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

Claim Number: _____

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

SECOND WITNESS STATEMENT OF DAVID COLWILL

David Colwill, a Planning Enforcement Manager, in the employment of the London Borough of Havering based at Mercury House, Romford and will say as follows:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014. The facts stated in this statement are within my own knowledge unless stated otherwise. Those facts outside of my own direct knowledge are true to the best of my knowledge and belief.
2. I make this statement further to my first witness statement. I have been asked to review the sites that the Claimant seeks to include within its injunction, in light of the provisions of the General Permitted Development Order 2015 ('GPDO') and to determine the application of permitted development rights ('PD') to the unauthorised encampments which the Claimant seeks to restrain, and following representations

made by the interest group 'London Gypsies and Travellers'.

3. The GDPO provides that PD applies to the use of land, other than a building, 'as a caravan site' in particular circumstances.
4. Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015/596 (GPDO 2015) states:

(1) Subject to the provisions of this Order and regulations 75 to 78 of the Conservation of Habitats and Species Regulations 2017 (general development orders), planning permission is hereby granted for the classes of development described as permitted development in Schedule 2.

5. Part 5 of Schedule 2 GPDO 2015 is entitled "Caravan sites and recreational campsites". Class A ("Use of land as caravan site") of this Part is as follows:

Permitted development

A. The use of land, other than a building, as a caravan site in the circumstances referred to in paragraph A.2.

Condition

A.1 Development is permitted by Class A subject to the condition that the use is discontinued when the circumstances specified in paragraph A.2 cease to exist, and all caravans on the site are removed as soon as reasonably practicable.

Interpretation of Class A

A.2 The circumstances mentioned in Class A are those specified in paragraphs 2 to 10 of Schedule 1 to the 1960 Act (cases where a caravan site licence is not required), but in relation to those mentioned in paragraph 10 do not include use for winter quarters.

6. Paragraphs 2, 3, and 10 of Schedule 1 to the Caravan Sites and Control of Development Act 1960 (CSCDA 1960) read as follows:

Use by a person travelling with a caravan for one or two nights

2 Subject to the provisions of paragraph 13 of this Schedule, a site licence shall not be required for the use of land as a caravan site by a person travelling with a

caravan who brings the caravan on to the land for a period which includes not more than two nights—

(a) if during that period no other caravan is stationed for the purposes of human habitation on that land or any adjoining land in the same occupation, and

(b) if, in the period of twelve months ending with the day on which the caravan is brought on to the land, the number of days on which a caravan was stationed anywhere on that land or the said adjoining land for the purposes of human habitation did not exceed twenty-eight.

Use of holdings of five acres or more in certain circumstances

3 (1) Subject to the provisions of paragraph 13 of this Schedule, a site licence shall not be required for the use as a caravan site of land which comprises, together with any adjoining land which is in the same occupation and has not been built on, not less than five acres—

(a) if in the period of twelve months ending with the day on which the land is used as a caravan site the number of days on which a caravan was stationed anywhere on that land or on the said adjoining land for the purposes of human habitation did not exceed twenty-eight, and

(b) if in the said period of twelve months not more than three caravans were so stationed at any one time.

(2) The Minister may by order contained in a statutory instrument provide that in any such area as may be specified in the order this paragraph shall have effect subject to the modification—

(a) that for the reference in the foregoing sub-paragraph to five acres there shall be substituted a reference to such smaller acreage as may be specified in the order, or

(b) that for the condition specified in head (a) of that sub-paragraph there shall be substituted a condition that the use in question falls between such dates in any year as may be specified in the order, or subject to modification in both such respects.

(3) The Minister may make different orders under this paragraph as respects different areas, and an order under this paragraph may be varied by a subsequent order made thereunder.

(4) An order under this paragraph shall come into force on such date as may be specified in the order, being a date not less than three months after the order is made; and the Minister shall publish notice of the order in a local newspaper

circulating in the locality affected by the order and in such other ways as appear to him to be expedient for the purpose of drawing the attention of the public to the order.

Travelling showmen

10 (1) Subject to the provisions of paragraph 13 of this Schedule, a site licence shall not be required for the use of land as a caravan site by a travelling showman who is a member of an organisation of travelling showmen which holds for the time being a certificate granted under this paragraph and who is, at the time, travelling for the purposes of his business or who has taken up winter quarters on the land with his equipment for some period falling between the beginning of October in any year and the end of March in the following year.

(2) For the purposes of this paragraph the Minister may grant a certificate to any organisation recognised by him as confining its membership to bona fide travelling showmen; and a certificate so granted may be withdrawn by the Minister at any time.

7. So far as I am aware, the encampments detailed in the Council's evidence are not of a type and nature for which PD would apply. The encampments that have been dealt with have been for more than two nights, which is the restriction contained within paragraph 2 of CSCDA 1960. Further, the condition within paragraph 2 of CSCDA 1960 applies to 'a person' travelling with 'a caravan' whereas the encampments within Havering are multiple persons with multiple caravans and other associated vehicles.
8. Paragraph 3 of CSCDA 1960 makes provision regarding holdings of more than 5 acres where there are no more than 3 caravans encamped for a total period not exceeding 28 days over a 12 month period. Again, the number of caravans that form encampments within Havering have exceeded this number. The land which the Claimant seeks to protect and which exceeds 5 acres is scheduled in **Exhibit DC2/1**.
9. In the event of the Court granting an injunction to cover those sites that exceed 5 acres, the Claimant will of course not seek to include within that injunction a term that prevents the exercise of lawful permitted development rights, as that conduct by its very nature cannot be said to constitute a breach of planning control.

10. The majority of sites the Claimant seeks to protect are below 5 acres and would not attract PD.
11. Regarding paragraph 4, I am not aware of any certificates of exemption referred to therein. Similarly regarding paragraph 5 I am not aware of any sites approved by exempted organisations nor, with respect of paragraph 6, any meetings organised by exempted organisations.
12. With regards to paragraphs 7 and 8, I am not aware of any sites approved being agricultural land during a season for farming operations.
13. With regards to paragraph 9 I am not aware of any sites which would have met this criteria.
14. With regards to paragraph 10, I am not aware of any of the named defendants being travelling showmen. If any of the persons unknown were travelling showmen, no certificates have been provided and I therefore presume that they were not travelling showmen. This conclusion is supported by the nature of the encampments which have been evidenced.
15. I am not aware of any development which would fall within PD of the description "*Class C – use of land by members of certain recreational organisations*".
16. I therefore confirm that the nature of the encampments experienced by the London Borough of Havering as detailed in its evidence is not of the nature that would have attracted PD, and therefore the nature and extent of the proposed injunction would not interfere with those lawful rights.

Statement of Truth

I believe that the facts contained in this witness statement are true

Signed: David Colwill

David Colwill

Dated: 31st July 2019

Claimant:
LB Havering
Natalie Price
First
Exhibits:
NP/1-NP/15
Date: 6th June 2018

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

Claim Number: _____

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND XX DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

**WITNESS STATEMENT OF
NATALIE PRICE**

I Natalie Price, a Planning Enforcement Officer, in the employment of the London Borough of Havering based at Mercury House, Romford and will say as follows:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014, against the above named Defendants. The facts stated in this statement are within my own knowledge unless stated otherwise. Where facts are outside my own direct knowledge they are true to the best of my knowledge and belief.

2. We had reports of a travellers incursion on the turning point of Spilsby Road on Wednesday 23rd May 2018. I visited the site on Wednesday 23rd May 2018, along with Planning Enforcement Colleagues Onkar Bhogal and Phillip Jones and two Officers from Parks Police. We served a Section 77 Notice of the Criminal Justice and Public Order Act 1994. The notice directed the travelers to vacate the land by 2pm on Thursday 24th May 2018. The notice included details of the nearby hospital and how to get there. There were no issues raised to us in regards to health or social care. I noted that there were 2 caravans, with the following details:
 - a. Caravan 1. Index (no plates)
 - b. Caravan 2. Index 12-D-1249
3. After we served Section 77 Notice, we left the site.
4. I took 6 photos during my visit and these are produced and shown to me as **[Exhibits NP 1 through to NP 6]**.
5. On Thursday 24th May 2018 we received information that another caravan had parked in the same location as the other caravans. I visited the site at 11.30am along with Planning Enforcement colleagues Onkar Bhogal and Phillip Jones and two Officers from Parks Police, and noticed that the two caravans were still on the land and that an additional caravan and van was now parked on the site, with the following details;
 - a. Caravan 3. Index N189 YRX
 - b. Van Index:- Ford Transit 131-KY-187
6. After confirming the details we left the site.
7. I took 3 photos and these are produced and shown to me as **[Exhibits NP 7 through to NP 9.]**
8. On Thursday 24th May 2018, I visited the site at 3.00pm along

with Planning Enforcement colleagues Onkar Bhogal and Phillip Jones, and found that the Van and Caravans have remained on the site. After confirming the details we left the site. I took 1 photo produced and shown to me as [Exhibit NP 10].

9. Barkingside Magistrates Court gave order for S78 on Thursday 5th June 2018. Along with the Planning Enforcement Manager David Colwill and officers from Parks Police, we collectively hand served the summons on every caravan which the occupants accepted. The individuals were unnamed. We also attached 2 copies of the summons to lampposts adjacent to the site, along Splisby Road. I took 5 photos and these are produced and shown to me as [Exhibits NP 11 through to NP 15].

Statement of Truth

The facts in this witness statement come from my own knowledge or where they are not from my own knowledge are true to the best of my knowledge or belief.

Signed:  _____

Name: Natalie Price

Date: 6th June 2018

Claimant: LB Havering
Kokoete Ekanem
First
Exhibits: KE1-KE28
Date: 20.06.18

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF KOKOETE EKANEM

I Kokoete Ekanem, a Planning Enforcement and Appeals Officer, in the employment of the London Borough of Havering based at Mercury House, Romford will say as follows:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014, against the above named Defendants. The facts stated in this witness statement are from my own knowledge unless stated otherwise. Where facts are outside my direct knowledge they are true to the

best of my knowledge and belief.

2. We had reports of an unauthorised encampment on a piece of land known as Painsbrook Open Space, Painsbrook Way which is in between Amersham Road, St Neotts Road and Paines Brook Way from Monday 11th of June 2018.
3. I am aware that Gary Carr (Parks Protection Officer) attended the site at 5pm on Monday 11th June 2018 and served a Section 77 Notice of the Criminal Justice and Public Order Act 1994 on the travellers and on the land. The notice, which is exhibited as evidence, directed the travellers to vacate the land immediately and to not enter the land again within 3 months of the date of the Direction. The notice included details of the nearby hospital and how to get there. There were no issues raised to us in regards to health or social care.
4. Thames Magistrates Court granted a summons for S78; to be served on the Travellers on Thursday 14th June 2018. Along with Planning Enforcement Colleagues Onkar Bhogal and David Colwill; and Steve Edwards from Parks Police; we collectively hand served the summons on every caravan which the occupants accepted. The individuals were unnamed. We also attached 2 copies of the summons to lampposts adjacent to the site, along Amersham Road. I took some photos and these are produced and shown to me as [**Exhibit KE1**] through to [**Exhibits KE21**]. We left the site at approximately 5pm.
5. On Friday, 15th June 2018, I attended Thames Magistrate Court, 58 Bow Road, London, E3 4DJ; as a witness for the Claimant. Thames Magistrates Court gave Order for S78 on Thursday 14th June 2018.
6. Along with Planning Enforcement Colleagues Onkar Bhogal

and Patricia Adesina and the Parks Police, we collectively hand served the Court Order of 15th June 2018 on every caravan which the occupants accepted. The individuals were unnamed. We also attached 2 copies of the summons to lampposts adjacent to the site, along Amersham Road. I took some photos and these are produced and shown to me as [Exhibits KE22] through to [Exhibits KE28]. We left the site at approximately 4pm.

The facts in this witness statement come from my own knowledge or where they are not from my own knowledge are true to the best of my knowledge or belief.

Signed: EJ (K. Ekanem)

Name: Kokoete Ekanem

Date: 20th June 2018

Claimant:
LBH
Name:
Gary Carr
First
Exhibits:
GC/01-
GC/10
Date:
13.06.2018

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF GARY CARR

I Gary Carr, a Parks Police Officer, in the employment of the London Borough of Havering, will say as follows:

1. I make this witness statement in support of the Claimant's claim for interim and final injunctions against the above defendants. The

facts stated in this witness statement are within my own knowledge unless otherwise stated. Where those facts are outside of my direct knowledge, they are true to the best of my knowledge and belief.

2. In my current position I am responsible for Policing the Borough Parks and Open Spaces by enforcing pleasure ground byelaws and other relevant criminal and traffic legislation.
3. On 11th February 2016 at 10:30 am I arrived at a location in the Ward of South Hornchurch where I waited travellers to be evicted from ford property. There were approximately 10 in total. I produce and am shown IRIS Report 21919 as **Exhibit GC/01**. I sat and watched them leave under the instruction of MET POLICE.
4. On 24th May 2016 at 10:12 am I arrived at a location in ward of Rainham and Wennington for a site visit. I produce and am shown exhibit IRIS Report 23314 as **Exhibit GC/02**. It was purely a site visit.
5. On 16th July 2016 at 14:05 I arrived at Central Park in Gooshays to undertake a site visit. I produce and am shown exhibit IRIS Report 23844 as **Exhibit GC/03**. This was purely a site visit.
6. On 3rd July 2017 at 14:17 I arrived at Tees Drive Open Space and found one caravan containing five children aged 15,11 and 9 years old and approximately 2 and 3 years old and two 2 adults. I received a phone call from Simon whilst I was at the scene. I produce and am shown IRIS Report 28183 as **Exhibit GC/04**.
On 3rd July 2017 at 15:29 I arrived at Tees Drive Open Space and

served a Section 61 Trespass Notice which was issued by hand. I produce and am shown IRIS Report 28184 as **Exhibit GC/05**.

7. On 26th August 2017 at 10:40 am I arrived at Harrow Lodge Park. I received a call from Metropolitan Police that a large group of Travellers were on route to try and gain access to Harrow Lodge Park. The officers managed to get to the main entrance in order to block access. The Travellers became abusive by beeping there horns loud and swearing saying (move the fuck out of the way). They then blocked Hornchurch High street with approximately 9 caravans. They then made their way back towards Dagenham. I produce and show IRIS Report 28771 as **Exhibit GC/06**.
8. On 27 August 2017 at 10:30 am I arrived at Harrow Lodge Park. Nine Caravans were evicted from the Rush Green area tried once again to gain access in to Harrow Lodge, however officers blocked access. I produce and am shown IRIS Report 28787 as **Exhibit GC/07**.
9. On 27th August 2017 at 11:05 am I arrived at Hornchurch Country Park. Nine Caravans attempted to gain access in to the Park, however officers blocked access. The travellers then decided to enter Tesco car park. I produce and have shown IRIS Report 28788 as **Exhibit GC/08**.
10. On Friday 30 March 2018 at 10:40, I was in full uniform, on mobile patrol, front passenger in a marked vehicle driven by PC Edwards and also present was Kenny Wilks, Enforcement Group Manager. We arrived outside Unit 1, stopping in New Road. Five (5) caravans were parked within the site with vehicles. Using my mobile phone, I took a photograph at 10:40, of the piles

of rubbish deposited next to the caravans within unit 1, which is produced and shown to me as **Exhibit GC/09**. Also produced and shown to me is a printed copy of the details of that photograph which at **Exhibit GC/10**. That was my only dealing in the matter.

11. On Monday 11 June 2018 at approximately 1:30 I arrived at PAINSBROOK OPEN SPACE, AMERSHAM ROAD, ROMFORD RM3. in company with my colleague PC JONES and entered the traveller site. There were seven (7) caravans in total. The occupants came over to us and we served each owner of each caravan, a copy of a section 77 notice served by PC Jones], asking them to leave the site with immediate effect. Photographs were not taken at the time due to us being outnumbered and we felt that taking photographs would ignite tensions at the site. As I left the site, I also attached a copy of the section 77 notice to the closest lamp post to the site and it still remains on display. That was the last time I dealt with them.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed:



Name: Gary Carr

Date: 13th June 2018

Claimant
Name: Martin Grant
First
Exhibits:
Date: 30.10.18

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

Claim Number: _____

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND XX DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF MARTIN GRANT

I, Martin Grant, Environmental Health Officer with the London Borough of Havering, Mercury House, Romford, RM1 3LR, WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's application for interim and final injunctions against the about defendants. The facts in this statement are within my own knowledge unless stated otherwise. Where facts are outside of my direct knowledge they are true to the best of my knowledge and belief.
2. I have been compiled in my current role since July 2005, having qualified as an Environmental Health Officer in June 1981. My duties include the investigation of statutory nuisances; those issues liable of being prejudicial to health and a nuisance within the terms of the Environmental Protection Act 1990. I have been asked to provide a statement detailing the EH concerns which can accompany unauthorized encampments which occur within the borough.

3. I am aware that it is common for such encampments to be accompanied with fly tipping of various waste items, along with human defecation and urination otherwise than in proper sanitized toilet facilities. This defecation and urination may be open to the air or otherwise deposited in the environment, for example in makeshift containers (bags, socks etc...). Used toilet paper may also be left in the environment.
4. I have been shown the following exhibits, which demonstrate the presence of open human defecation at these sites. Human excreta, the collective name for human faeces and urine, contain many disease causing pathogens (viruses, bacteria, cysts protozoa and eggs of parasitic worms). One negative impact of human waste is the risk of surface water contamination which is caused by liquid and solid waste products that find their way into water bodies. Once out of the body stools are subject to environmental bacteria that may use the excrement as food, and thrive. When dry stools become lighter and more susceptible to becoming airborne, this creates a potential to travel greater distances and affect more people.
2. Proper sanitation is required to prevent the spread of a wide range of bacterial and viral diseases and intestinal parasites. Defecation on land without subsequent appropriate treatment does not constitute proper sanitation.
3. Disease-causing organisms that can live in the human gut are spread from person to person when they are excreted in the faeces, and can be transmitted by direct contact with faeces, or objects in the environment that have been contaminated by faeces. This is the phenomenon of faecal-oral route infection well known in public health disease control. Typically transmission is by infective organisms reaching the mouth from contaminated hands or from food or objects contaminated by contaminated hands.
4. Contamination of surface waters food and drinking water supplies is a risk with uncontrolled presence of untreated human faeces on land.
5. Diseases that are recognized as being spread in this way include viral and bacterial gastro- enteritis; hepatitis; cholera; dysentery; shigellosis; typhoid; Giardiasis and intestinal worm infections. Many such diseases are potentially fatal.

6. Contact with faeces can cause skin infections particularly when there are minor cuts or abrasions. Infections could in the worst cases lead to septicaemia and death. Eye infections through contact with mucous membranes (for example conjunctivitis) are a widely recognized risk of faecal contamination.
7. There is now produced and shown to me [Exhibit MG/01], a photo collage of gathered at Wincanton Road within the London Borough of Havering, shows what appears to be of human faeces on toilet tissue, left behind by those forming the unauthorized encampments which are the subject of this injunction.
8. Animals also naturally carry a range of diseases, some of which can also affect humans. These diseases are known as zoonoses. These diseases also encompass viral, bacterial diseases and parasitic infections.
9. Exhibit MG/01, also shows what appears to be of animal faeces left behind at these sites.
10. I confirm that I consider the accumulation of untreated faeces contained in these photographs to be prejudicial to human health in public health terms.

I believe that the facts stated in this witness statement are true.

Signed: M T Grant

Name: MARTIN THOMAS GRANT

Date: 30-10-2018

Claimant
C Zervou
First
Exhibits
Date: 21.12.18

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

**WITNESS STATEMENT OF
CHRISTINA ZERVOU**

I Christina Zervou, a Senior Public Protection Officer for Environmental Protection, in the employment of the London Borough of Havering based at Mercury House, Romford and will say as follows:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014. The facts stated in this statement are within my own knowledge unless stated otherwise. Those facts outside of my own direct knowledge are true to the best of my knowledge and belief.
2. I am currently employed as a Senior Public Protection Officer for Environmental Protection at the London Borough of Havering based at Mercury House Mercury Gardens Romford RM1 3SL. My duties include provision of specialist advice in the technical areas of air quality, contaminated land and acoustics. I hold a Masters of

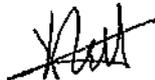
Engineering (MEng) in Chemical Engineering and have six years experience in waste management.

3. According to current guidance on asbestos issued by Public Health England (<https://www.gov.uk/government/publications/asbestos-properties-incident-management-and-toxicology>), asbestos consists largely of fibres which can have adverse health effects. These effects depend on several factors, including the amount to which people are exposed (dose), the duration of exposure, the way of exposure, the form of asbestos and if there is exposure to other chemicals as well. The main route of exposure to asbestos fibres is through inhalation and to a lesser extent ingestion.
4. Illegal dumping of materials containing asbestos is likely to lead to a release of asbestos fibres into the air.
5. According to current guidance on asbestos issued by Public Health England (<https://www.gov.uk/government/publications/asbestos-properties-incident-management-and-toxicology>), short-term high level inhalation exposure to asbestos has been associated with lung cancer, mesothelioma and pleural disorders such as pleural plaques. Such effects may be observed following a latency period of approximately 30 years. Epidemiology studies have shown that chronic inhalation of all types of asbestos fibres is associated with asbestosis, pleural abnormalities, mesothelioma and lung cancer.
6. Any asbestos removal works shall be in compliance with the Control of Asbestos Regulations 2012 and current guidance issued by the Health and Safety Executive.
7. Disposal of asbestos waste shall be in compliance with the Hazardous Waste Regulations 2005. According to current good practice guidance on disposal of asbestos waste (ref. EM9) issued by the Health and Safety Executive, asbestos waste must be packed in UN-approved packaging, transported by a licensed waste carrier in sealed skips or vehicles, accompanied by Waste Consignment Notes and disposed to a licensed disposal site.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed:



Name: Christina Zervou

Date: 21st December 2018

Claimant
D Ferry
First
Exhibits: DF/1
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

WILLIAM STOKES AND XX OTHERS LISTED ON THE ATTACHED
SCHEDULE

XX PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF DEBORAH FERRY

I, Deborah Ferry, Area Supervisor employed at London Borough of Havering/Public Realm, Harrow Lodge Depot, Harrow Lodge Park, Hornchurch, Essex RM11 1JU, WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from within my own knowledge unless stated otherwise. Where facts are not within my own direct knowledge they are true to the best of my knowledge and belief.
2. I have been employed by the London Borough of Havering for two and a half years and am currently engaged as an Area Supervisor. My roles and responsibilities include the clear up operation of traveller incursion, fly tipping in the rural lane's and the general cleansing of the rural and trunk roads with my rural team and anything on a larger scale I would engage the assistance of my grab lorry and driver. I have a team of 38 staff and our main aim is to keep the

Claimant
D Ferry
First
Exhibits: DF/1
Date:

Borough fly tip free. My team is responsible for, amongst other things, responded to unauthorised encampments where there has been an element of fly tipping, and arranging for the removal of waste from the site and subsequent site clearance. Typically, when there is a report of an incursion, myself and my team would meet onsite with enforcement staff and police, once the site has been clear of vehicles we would then go in and start the clear up operation. This is a risky business and requires specialist protective equipment due to the nature of the materials that are normally left behind.

3. I have been asked to review the Claimant's system to provide an estimate of the total cost of clear ups following encampments. I have been provided with a list of unlawful encampments from 2016 to date. I have reviewed the Council's computer systems and have produced a spreadsheet detailing the costs. This is produced and shown to me as Exhibit DF/1.
4. In summary, the Council has engaged in 227 man hours responding to these incidents which, at a rate of £32.00 per hour, has cost the Council some £16,832.00 in officer time. There has been 685.5 tons worth of fly tipped material which has been removed at the cost of the Council, that cost being £145,635.30. Therefore the total combined cost is £162,467.30.
5. In addition this this, the Council has also arranged for installation of boulders at a number of sites, please see attached for costing for this. There have also been occasions where the travellers have filled up empty caravans and placed them at the site entrances. They get filled with asbestos, oil, gas canisters, tyres and other waste including human waste. The caravans have then been removed and crushed, specific examples of this are detailed in the attached spreadsheet.

I believe that the facts stated in this witness statement are true.

Signed: _____
Deborah Ferry

Date:

12/3/19

Claimant LB Havering
First
Exhibits:
Date: 5.11.2018

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

Claim Number: _____

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND XX DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF PHILLIP A. JONES

I, Phillip Jones, currently employed as a Planning Enforcement Officer with the London Borough of Havering Mercury House, Romford, RM1 3SL, WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimants claim for interim and final injunctions against the above named defendants. The facts stated in this witness statement are within my own knowledge unless otherwise stated. Facts which are outside of my own direct knowledge are true to the best of my knowledge and belief.
2. My duties include investigating and resolving planning breaches to the satisfaction of the Local Planning Authority. This can require negotiating with land and property owners, and in the more serious cases the issue of planning enforcement notices to rectify the breach and in the case of non-compliance

with a notice, prosecution via the Magistrate and Crown Courts.

3. During the course of my duties I have had cause to be involved with the following unauthorised encampments.

2nd & 15th June 2016. Lamson Road, Rainham.

4. I attended the site with Havering colleagues Onkar Bhogal and Steve Lomas and we carried out a welfare check by asking the people present if anyone was pregnant or suffering from a long term illness, no one was in need of medical treatment but details of the nearest hospital and directions of how to get there were given. I do not recall a reason being given as to why the travellers had chosen this site. I had very little contact with the travellers on this occasion. I cannot provide any further information as I was not the lead officer in relation to this matter.
5. The travellers on the second incursion, gave no reasons as to why they were at this location, as the site had been subject of a previous incursion the S77 Notice remained in effect. The Council sought and obtained a court order and this was subsequently served on the site but I cannot provide any further information as I was not the lead officer in relation to this matter.

9th July 2016. Highway land Wincanton Road, Harold Hill.

6. The travellers at this location were on Council Highway land and were found not to have any social or health needs. The travellers, although somewhat reluctant to move on, left the site after 2 days without the Council needing to serve a S77 notice. I was not the lead officer in relation to this matter so cannot provide any further information.

6th September 2016. Farringdon Road. Harold Hill

7. I attended this site with colleagues and it was confirmed verbally that the travellers did not have any social or health needs. They left the site the following day following a bailiff eviction. I cannot provide any further information as I was not the lead officer in relation to this site.

6th September 2016. Lilliput Open Space. Romford

8. I attended this site with three colleagues a number of times and the travellers, when asked, did not express any social or health needs. During the time they were on site there was a considerable amount of anti-social behaviour and tension with the local residents including verbal intimidation, driving vehicles at speed in the surrounding streets and general noise and disturbance. Police attended on a number of occasions. During one visit two of my colleagues had a laser light shone into their face and eyes, which caused a degree of discomfort. During the final couple of days before the eviction, the atmosphere was very tense between the local residents and the travellers. The site was cleared on Saturday September 10th but as I was not lead officer so I have no further details in relation to this site.

26th February 2018. Queens Theatre, North Street, Hornchurch.

9. Complaints were received by the Planning Enforcement Team with regard to an unauthorised traveller encampment on a car park to the north of the Queens Theatre in Hornchurch. The site had been visited by other departments to confirm the incursion and numbers of caravans. I attended the site on the 26th February 2018 with two colleagues and asked the travellers present to vacate the site by 10.00 on the 27th February 2018. I visited the site and confirmed that the caravans and associated vehicles had vacated the land on the 27th February 2018, without the need to serve a formal notice under S77.

27th February 2018 BT Telephone exchange, Wedlock Road, Hornchurch.

10. Following the visit to the car park north of the Queens Theatre on the 27th February 2018 I confirmed that the same travellers had just relocated, across North Street to the east side of the Queens Theatre on to a small strip of unregistered land to the south of the BT building on Wedlake Road, Hornchurch. As it was unclear who owned the land BT was informed of the traveller incursion, however it was subsequently established that the incursion was on a piece of unregistered land maintained by the Council. The travellers vacated the site following the service of a S77 Notice but I was not the lead officer in relation to this site so have no further

information.

12th March 2018. Como Street, Romford.

11. A complaint was received by the Planning Enforcement Team on the 12th March 2018 in relation to a traveler incursion at a Council car park on Como Street, Romford. On 13th March 2018, I visited the car park with two colleagues Sager Perwez and Steve Lomas from the Planning Enforcement Team. We made informal requests for the travellers to move from the site. In discussions with the travellers it was clear that they were due to move off the site towards the end of the week. A colleague made a further visit to the site on the 19th March 2018 and confirmed the travellers had vacated the site, without the need to issue formal S77 notices. The site was left in a very clean condition and no further action was required on behalf of the Council.

7th March 2018. 69 Front Lane, Upminster.

12. Complaints were received by the Planning Enforcement Team that travellers had moved onto a car park at 69 Front Lane, Upminster. The site was visited by colleagues and on the 12th March 2018 and a S77 Notice was served on the travellers and I exhibit a copy of the Notice as Exhibit PAJ/01. The travellers indicated that they were not willing to move from the site until a court order was produced by the Council.

13. I visited the site on the 13th & 14th March and confirmed that two caravans were still parked on land to the south of the main car park in an area used for local residents to drop off their recycled goods.

14. As the travellers had not vacated the site following the service of the S77 Notice, an application was then made to Barkingside Magistrates' Court for an Order for removal. A S78 notice was issued by Barkingside Magistrates Court on the 22nd March 2018 and is Exhibited as PAJ/02. I along with two of my colleagues, Steve Lomas and Sager Perwez, served a copy of the notice on the occupiers of the two caravans on the 22nd March 2018 requiring them to vacate the site by 12 noon on 23rd March 2018. I visited the site on the 23rd March 2018 and

confirmed that both caravans and associated vehicles had vacated the site. I attach a number of photographs of the site as Exhibit PAJ/03.

24th April 2018. Lampson Road/Ferry Lane, Rainham.

15. A complaint was received the Planning Enforcement Team on the 24th April 2018 from British Transport Police ('BTP') with regard to a traveller incursion on Ferry Lane, Rainham. I visited the site with a colleague Steve Lomas on the same day and met the BTP who were due to serve a S61 notice on the section of land to the south of the high speed rail line. Three caravans were also parked up on west side Ferry Lane.

16. Following discussions with the travellers the BTP decided that the S61 would not be served at that time and the travellers indicated they would be leaving Ferry lane on the 26th April 2018. The site was subsequently vacated and an officer visited on the 27th April and confirmed the travellers had vacated the site. I was not the lead officer in relation to this matter so cannot provide any further information.

Traveller incursions on Private Land

17. The Planning Enforcement Team has also been notified of at least seven other sites, within the borough, that have been the subject of traveller incursions taking place on private land. As the Council does not have any direct powers or the financial resources to take formal action, regarding evictions on private land, we notify the land owners of the incursion and advise the best course of action available. A list of the privately owned sites most recently subject to traveler incursions are below;

- The Pompadours PH, Edenhall Road, Harold Hill, RM3 8DR. Reported to Planning Enforcement on the 8th March 2018.
- The Verve Apartments, Mercury Gardens, Romford, RM1 3FB. Reported to Planning Enforcement on the 20th March 2018.
- Simply Loos, Manor Way, New Road Rainham, RM13 8RH. Reported to Planning Enforcement on the 26th March 2018.

- Cockney Gent PH, 86 Petersfield Avenue, Harold Hill, RM3 9PH. Reported to Planning Enforcement on the 27th March 2018.
- Vickers House, 365 South Street, Romford, RM1 2BP. Reported to Planning Enforcement on the 28th May 2018.
- The Morris Dancer PH, Melksham Close, Harold Hill, RM3 8QX. Reported to Planning Enforcement on the 22nd June 2018.
- Former Petrol Station, 6 Eastern Avenue, Romford, RM1 4DR. Reported to Planning Enforcement on the 19th July 2018.

18. The traveller incursions mentioned on Council land have taken a considerable number of hours by numerous Council staff from different departments to resolve the issues. This has a very significant financial impact upon the Council budget but I do not have responsibility for the Planning budget so I cannot provide any further information on this matter.

19. I believe that the facts stated in this witness statement are true.

Signed: 

Name: Phillip A. Jones

Signed: 5th November 2018

Claimant: LB of Havering
Witness: Onkar Bhogal
Exhibits: OB/1-OB/16
Date: 17.02.18

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

Claim Number: _____

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND XX DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF ONKAR BHOGAL

I, Onkar Bhogal, currently employed as a Principal Planning Enforcement Officer for the London Borough of Havering, Mercury House, Mercury Gardens, Romford RM1 3DW WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for an interim and final injunction against the above defendants. The facts stated in this statement are within my own knowledge unless stated otherwise. Where facts are outside of my own direct knowledge they are true to the best of my knowledge and belief.

2. I am responsible for monitoring traveller incursions and interactions with unauthorised traveller encampments in the London Borough of Havering. There is no planning consent for traveller encampments within the Borough, but there are tolerated private traveller sites located at:

- Hogbar Farm Lower Bedfords Road Romford
- Benskins Lane, Noak Hill, Romford Willoughby Drive, Rainham
- Ockendon Sidings, Ockendon Road, Upminster
- Prospect Road, Hornchurch

6th May 2016 - Broxhill Centre Noak Hill Road

3. I attended the site with Enforcement colleagues Sam Cadman and Steve Lomas and we carried out a needs survey by asking each family present if they had any health problems and advised them where the nearest hospital was **[Exhibit OB1]**, no travellers expressed a need for help from the Authority. I do not recall a reason being given as to why the travellers had chosen this site. The atmosphere was relaxed and the site was vacated within five days. The travellers left the land in a tidy state.

27th May 2016- Lamson Road, Rainham

4. I attended the site with my colleagues Sam Cadman and Phil Jones and we carried out a needs survey, travellers did not expressed a need for help from the Local Authority. I do not recall a reason being given as to why the travellers had chosen this site. I had very little contact with the travellers on this occasion. A Section 77 Notice **[Exhibit OB2]** was served by us and the travellers left the site on 28th May 2016 before S78 notice was applied for.

2nd June 2016 - Lamson Road, Rainham

5. I attended the site with colleagues Sam Cadman, Steve Lomas and Phil Jones and we carried out a needs survey, no travellers expressed a need for help from the Authority. I do not recall a reason being given as to why the travellers had chosen this site. I had very little contact with the travellers on this occasion. The travellers left the site after a couple of days before S78 notice was granted by Barkingside Magistrates Court.

15th June 2016 - Lamson Road, Rainham

6. I attended the site accompanied by Sam Cadman and Scott Davison. The travellers on this occasion gave no reasons as to why they were at this location, as the site had been subject of a previous incursion the S77 Notice remained in effect. After service of Court summons, the travellers failed to appear at Barkingside Magistrate Court and therefore on 17th June 2016, a S78 Order was applied for and granted by the court. Bailiffs were about to be instructed but the travellers had vacated the site the day after the S78 Order granted. There was very little rubbish left at the site.

27th June 2016 - Broxhill Centre Noak Hill Road

7. I attended the site accompanied by Sam Cadman and Scott Davison. We spoke to the travellers about their welfare needs. The travellers expressed no health or social needs and were then served with a letter requiring them to leave; they left the site the following day.

8th July 2016 - Mecca Bingo Hall High Street, Hornchurch

8. This site was not attended by any of LBH staff because the travellers had occupied private land and the eviction was undertaken by the landowner, the site was vacated after 9 days. The Council was not involved in the eviction process.

9th July 2016 - Highway land Wincanton Road, Harold Hill

9. This site was visited by Sam Cadman, Phil Jones and myself in presence of Parks Police. Spoke to the travellers about their welfare needs and the travellers expressed no health or social needs. The atmosphere was mildly tense because the travellers refused to accept Common Law Trespass letters were very angry and intimidating but they eventually were served with a Common Law Trespass letters, the site was vacated within the next two days. There was a considerable amount of rubbish left behind.

14th July 2016 - Balgores Lane playing field adj. to Gidea Park Library

10. I attended the site with colleagues Sam Cadman, Steve Lomas and Tony Coombes and we carried out a needs survey, no travellers expressed a need for help from the Authority. Travellers had occupied school playing field, we noted there were in excess of 10 caravans, horses and other animals in the field. The atmosphere was quite tense, travellers were aggressive and I was verbally abused by one of the travellers. S61 Notice issued by Police. Police evicted the travellers on 14th July 2016.

24th August 2016 - Chudleigh Road Open Space, Harold Hill

11. I attended this site along with Council colleagues and the local Police. Given criminal damage was caused by removal of bollards and then driving the caravans through the gap in the park land. The Police served the travellers with a Section 61 Notice and the site was vacated the same day. There was a considerable amount of rubbish left behind. As the Council officers were not present during the eviction process, photographs are not available.

6th September 2016 - Lilliput Open Space, Romford

12. I attended this site with Sam Cadman on two occasions, (6th and 7th September 2016) and noted approximately 10 caravans on site. When inquiries about the welfare needs made, travellers did not express any social or health needs. During the time they were on site there was a considerable amount of anti-social behaviour, neighbours were harassed, verbally abused and tension with the local residents was very high. Police attended the site on a number of occasions. During one visit my colleague and I had a laser light shone into our eyes which caused a degree of discomfort. S78 Direction letter was served upon the travellers on 7th September 2016 and S78 on 9th September 2016. **[Exhibit OB3]** During the final couple of days the atmosphere was very tense because of the verbal abuse hurled at Council staff by the travellers. Bailiffs were instructed on 9th September 2018 and the travellers evicted on the same day. There was a considerable amount of rubbish left behind.

27th February 2018 - British Telecom Exchange Building

13. On 27th February 2018 I attended the British Telecom (BT) Telephone Exchange building site at Wedlock Close Hornchurch with Planning Enforcement Officers. Initially the Council were of the opinion the travellers had occupied land belonging to BT. After making further inquiries and exchange of several emails, it was established the incursion had taken place on a piece of unregistered land, which was maintained by the Council. I attach photographs taken on the 27th February 2018 as **[Exhibit OB/4]**.

14. On 5th March 2018 I served a S77 Notice under The Criminal Justice and Public Order Act 1994 (CJPOA) upon occupiers of three caravans on the site. The notice required them to leave the land on 6th March 2018 by no later than 10a.m. I exhibit a copy of the said Notice at **[Exhibit OB/5]**.
15. On 6th March 2018, Enforcement officer Sager Perwez carried out a site visit and confirmed the travellers had left the site but left the land in an untidy condition. There was small amount of building debris and some black bags full of rubbish in the area that had been occupied by the travellers.

7th March 2018 - Front Lane Cranham

16. On 7th March 2018 the Planning Enforcement service was informed members of public that a group of travellers had encamped on a public car park in Front Lane Cranham. A site visit by enforcement staff including myself confirmed that there were 3 caravans on the land along with associated vehicles. This group of travellers I recognised were the same group that had occupied land opposite to Queens Theatre and BT building. I attach photographs taken on 7th March 2018 as **[Exhibit OB/6]**.
17. On 12th March 2018 a Section 77 CJPOA notice was served by me, directing the travellers to vacate the land no later than 12 noon Tuesday 13th March 2018. On 13th March 2018 enforcement staff noted that two traveller caravans remained on the land. I exhibit a copy of the s.77 Notice as **[Exhibit OB/7]**.
18. On 21st March 2018 court summons was served upon the travellers to attend Barkingside Magistrates Court on 22nd March 2018 at 10 a.m. I exhibit a copy of the summons as **[Exhibit OB/8]**. Enforcement staff

attended the court at the prescribed time but the travellers failed to attend. The London Borough of Havering applied for an Order for the Removal of Vehicles and persons under Section 78 of the Criminal Justice and Public Order Act 1994. On the same day the Order was granted by the court and authorised LBH officers to take such steps as are reasonably necessary to effect the removal of all vehicles and other property on the land together with any persons residing on the land. This notice was served on the travellers on the same day directing that they leave by no later than 12 noon on 23rd March 2018. I exhibit a copy of the Order as [Exhibit OB/9].

19. On the 23rd March 2018 LBH Planning Enforcement officers visited the land and noted that the travellers had vacated the site before the prescribed time and therefore no further action was necessary.
20. During the entire process I was made aware by our call centre that a number of complaints had been received from members of the public who reside close to the site and that there was constant noise and disturbance from the travellers and that there were other associated anti-social behaviour fly tipping in the area they had occupied and Environmental Health issues resulting from the travellers being on the land. It was my understanding that other departments within the London Borough of Havering were dealing with these matters Council's Parks Police and Street care were also monitoring the site.

12th March 2018 - Como Street

21. On 12th March 2018 the Planning Enforcement service was informed by members of Public that a group of travellers had encamped on a public car park in Como Street, Romford. I carried out a site visit in company of enforcement officers and confirmed there were 9 caravans along with associated vehicles belonging to one extended

family on the land. I attach photographs taken on 12th March 2018 as **[Exhibit OB/10]**.

22. On 13th March 2018, I attended the site accompanied by other Sam Cadman, Phil Jones and noted there were now 11 caravans. After carrying out welfare checks I served Section 77 CJPOA Notices upon the travellers requiring them to leave the land by no later than 12 noon on 14th March 2018. A copy of the notice is exhibited at **[Exhibit OB/11]** and copies of photographs are exhibited as **[Exhibit OB/12]**
23. On 20th March 2018, a site visit was carried and I established all the travellers had left the land leaving it in a tidy state.
24. During the entire process I was made aware by our call centre that a number of complaints had been received from members of the public who reside close to the site. Reports of anti-social behaviour and Environmental Health were not highlighted. It was my understanding that other departments within the London Borough of Havering were also aware of this incursion.
25. It is difficult to exactly quantify the cost to the Council of continuously having to move encampments on from site to site, but enforcement action of this nature takes a considerable number of hours by numerous staff to resolve, which has a very significant financial impact upon the Council's limited budget. It is plain, that the travellers when served with a notice to leave the land under section 77 CJPOA, simply move to the next site within the Borough, requiring the council to again commence the entire process of removal under the Criminal Justice and Public Order Act 1994.

St Neots Parks Open Space, St Kneots Road, Romford

26. On 9th August 2018, we received complaint from Parks Police that the above site had been occupied by travellers and parked 8 caravans on the site. David Colwill visited and Phil Jones visited the site on 9th August 2018 and noted the 8 caravans and motor vehicles parked on the grass verge. Photographs were taken [Exhibit OB/13]. S77 direction notice was served upon the travellers requiring them to vacate the site immediately. [Exhibit OB/14]. On 13th August 2018, we were informed by Parks Police that the travellers had moved away from site had been cleared and the land was left in a tidy condition.

13th August 2018 – Land Opposite 10 Clematis Close, Romford

27. On 13th August 2018 we had reports from members of the public of a traveller incursion on the land opposite 10 Clematis Close, Romford RM3 8JL. The land had been occupied by 8 caravans.
28. I along with my colleagues visited the site on the same day and I served a Section 77 Notice under the Criminal Justice and Public Order Act 1994 to occupiers of Seven Caravans. I exhibit a copy of the said Notice as [Exhibit OB/15]. The notice directed the travellers to vacate the land immediately. The notice included details of the nearby hospital and how to get there. There were no issues raised to us with regard to their health and social care.
29. After serving the S77 Notice, I took a number of photographs and I exhibit these as [Exhibit OB/16], we then left the site.
30. I recognised this this group of travellers and confirm that this is the same group that had occupied St Neots Adventure Playground, St Neots Road, Harold Hill, Romford.

31. I believe that the facts stated in this witness statement are true.

Signed:  _____

Name: Onkar Bhogal

Date: 17.08.2018

Claimant
K Sullivan
First
Exhibits:KS01-
KS12
Date:

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF KEVIN SULLIVAN

I, Kevin Sullivan, previously employed at Havering College of Further and Higher Education, Ardleigh Green Road, Hornchurch, Essex, RM11 2LL
WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts stated in this statement are within my own knowledge unless stated otherwise. Where facts are outside of my own direct knowledge they are true to the best of my knowledge and belief.

2. Whilst at work on Wednesday 06 April 2016 at the Havering College Ardleigh Green site, I was informed by Duane Smith, Premises Supervisor at the time for Havering College who was initially informed by Marc Henesy, Security Operative on site of an unauthorised encampment on our Rainham campus vacant land. We took photographs of the caravans and other vehicles that had arrived on site, these produced and shown to me as **[Exhibits KS01]** and **[KS02]**.
3. We contacted both the police and the local authority and were advised that we needed to deal with the issue ourselves. The Police attended site at 11:30am by which time there was approximately 20 traveller caravans parked on our land and they had padlocked the gates back up using their own chain and padlock. They informed the Police that they were claiming squatter's rights and produced a notice to the police and put this on the gate. The Police then informed Marc Henesy, Security Operative that there was nothing more they could do at this point and that the college would need to go through legal proceedings to have them evicted.
4. We were unsure who to contact in the Local Authority so spoke with Christopher Hobbs on 06 April 2016 who in turn spoke with Christopher Barter and they advised that the Rainham BID group monitor travellers in the area so we contacted them to appraise them. The next contact from the Local Authority was from Simon Thelwell on 13 April following extensive fly tipping on the site and advising that the Local Authority may be looking at future options. Simon also requested photographs or CCTV so it could be forwarded to the Environment Agency. I seem to recall that the Police were not prepared to take any action as the travellers were

on what was classed as non-operational college land. However, the second time we had an issue with travellers on college land it was on the operational element of the Rainham Campus and despite being in a holiday period the Police did act swiftly and remove them within 24-48hrs.

5. We contacted our lawyers and started work towards obtaining a court order for possession of the land. Over the week following the arrival of the travellers we took further photos of rubbish that had been dumped on our land. These are produced and shown to me as Exhibits, [KS03], [KS04], [KS05], [KS06], [KS07], [KS08], and [KS09]. The waste was classed as mixed waste and the 33 waste transfer notes are now produced and shown to me marked [Exhibit KS12].
6. On 13 April 2016 our lawyers advised that they had been informed by the court that the proceedings for the Interim Possession Order had been listed for 19 April 2016. Prior to the Interim Possession Order, the travellers left site on 17 April 2016. On 18 April 2016 the Deputy District Judge Oldham, was informed that persons unknown had left the property on 17 April 2016 and advised that we could not take possession until a court order had been provided. An Order for Possession was granted by the court dated 26 April 2016, this is produced and shown to me as [Exhibit KS10].
7. When the travellers arrived on site on 06 April 2016 the college was on Easter break. However, students returned to college on 11 April 2016 and concerns were raised by students and parents regarding safety issues. Additional security cover for site was arranged at a cost of circa £5,000 per week. Thankfully there was not too much tension as we did not prevent the travellers from getting water from

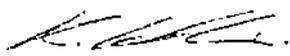
the college site but their behaviour was certainly anti-social and disrespectful, as they left fly-tipping costing the college several thousand pounds in waste removal costs, detailed below, and there was also excrement in various places on the site. Once the Order for Possession was received on 26 April 2017 and we had regained possession of the site we set about making arrangements to have the rubbish cleared.

8. The total cost of clearing the rubbish from the college land was £25,788.00 inclusive of VAT and the legal fees for obtaining the Possession Order amounted to £5,287.60. A copy of an email dated 25 October 2016 to Trevor Rockliff of the London Borough of Havering highlighted these costs is provided is produced and shown to me as **[Exhibit KS11]**.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Name: Kevin Sullivan

Signed: 

Date: 17/07/2019

Claimant: LB of Havering
First
Exhibits:
Date:

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF STEVE LOMAS

I Steve Lomas, currently employed as a Senior Planning Enforcement Officer for the London Borough of Havering, Mercury House, Mercury Gardens, Romford RM1 3DW, WILL SAY AS FOLLOWS:

1. I make this witness statement in support of the Claimant's claim for an injunction against the above named defendants. The facts stated within this statement are within my own knowledge unless stated otherwise. Where facts are outside of my own direct knowledge they are true to the best of my knowledge and belief.
2. I am responsible for monitoring traveller incursions and interactions with unauthorised traveller encampments in the London Borough of Havering. There are very few traveller encampments within the borough that benefit from planning consent however there are a number of tolerated private traveller sites located at:

- Hogbar Farm, Lower Bedfords Road, Romford
- Benskins Lane, Noak Hill, Romford
- Willoughby Drive, Rainham
- Ockendon Sidings, Ockendon Road, Upminster
- Prospect Road, Hornchurch

3. In the course of my duties I had cause to respond to the following unauthorised encampments.

6th May 2016. Broxhill Centre, Noak Hill Road

4. I attended the site with Planning Enforcement colleagues and we carried out a verbal needs survey, no travellers expressed a need for help from the Authority. I do not recall a reason being given as to why the travellers had chosen this site. I had very little contact with the travellers on this occasion. I understand that a Section 77 Notice was served and the travellers left the site after a couple of days. I believe they left of their own accord.

2nd June 2016. Lamson Road, Rainham

5. I attended the site with Planning Enforcement colleagues and we carried out a verbal needs survey, no travellers expressed and need for help from the Authority. I do not recall a reason being given as to why the travellers had chosen this site. I had very little contact with the travellers on this occasion. I understand that a Section 77 Notice was served and the travellers left the site after a couple of days. I believe they left of their own accord.

15th June 2016. Lamson Road, Rainham

6. The travellers on this occasion gave no reasons as to why they were at this location and were eventually summonsed to court however they vacated the site after 5 days. I cannot provide further information as I was not the lead officer in this matter.

27th June 2016. Broxhill Centre, Noak Hill Road

7. The travellers expressed no health or social needs and were served with a Common Trespass Notice, they left the site the following day. I cannot provide further information as I was not the lead officer in this matter.

8th July 2016. Mecca Bingo Hall, High Street, Hornchurch

8. On attending the site it was confirmed that it was private land and the eviction was undertaken by the landowner, the site was vacated after 9 days. I cannot provide further information as I was not the lead officer in this matter and the land is privately owned therefore we do not become involved.

9th July 2016. Highway Lane, Wincanton Road, Harold Hill

9. The travellers at this location were on Council Highway land and following a verbal needs survey were found not to have any social needs. I sensed that the atmosphere was mildly tense but they were served with a Common Law Trespass Notice and the site was vacated after 2 days. There was a considerable amount of rubbish left behind. I cannot provide further information as I was not the lead officer in this matter.

24th August 2016. Chudleigh Road Open Space, Harold Hill

10. I attended this site along with Planning Enforcement colleagues and the local Police. Given the criminal damage that had occurred the Police served the travellers with a Section 61 Notice and the site was vacated the same day. There was a considerable amount of rubbish left behind. I cannot provide further information as I was not the lead officer in this matter.

6th September 2016. Farringdon Road, Harold Hill

11. I attended this site with colleagues and the travellers did not have any social or health needs. They left the site the following day following a bailiff eviction. I cannot provide further information as I was not the lead officer in this matter.

6th September 2016. Lilliput Open Space, Romford

12. I attended this site with colleagues a number of times and the travellers did not express any social or health needs. During the time they were on site there was a considerable amount of anti-social behaviour and tension with the local residents, this apparently was based upon driving cars above the speed limit in adjacent roads and also noise, Police attended on a number of occasions. During one visit a colleague and myself had a laser light shone into our eyes which caused a degree of discomfort. During the final couple of days the atmosphere was very tense between Council staff and the travellers given that they felt they were being harassed. There was a considerable amount of rubbish left behind. I cannot provide further information as I was not the lead officer in this matter.

18th June 2018. Gooshays Gardens, Harold Hill

13. On Monday 18th June 2018 the Planning Enforcement service for the London Borough of Havering was informed by local residents that travellers had camped on land at Gooshays Drive, Harold Hill, Romford and adjacent to Gooshays Gardens. I prepared a Section 77 Notice under the Criminal Justice and Public Order Act 1994. We then attended the land and served the notice on all travellers on the land. The notice directed the travellers to leave with immediate effect and they informed us that they would not comply. I produce and am shown the notice as **[Exhibit SL/1]**. Before leaving the land a number of photographs were taken. I produce and am shown the photographs as **[Exhibit SL/2]**.

14. On 19th June 2018 instruction and information was given to the Legal Services team to prepare and request a summons for the travellers to attend the Magistrates' Court. The summons to court was served on all travellers at approximately 4pm on Wednesday 20th June 2018. The travellers confirmed that they had no intention of attending court. I produce and am shown the summons as **[Exhibit SL/3]**.

15. On Thursday 21st June 2018 I attended Barkingside Magistrates Court with the Borough legal representative. The Magistrates granted the London Borough of Havering an Order for the Removal of Vehicles and Persons under Section 78 of the Criminal Justice and Public Order Act 1994. I produce and am shown the S78 Order as **[Exhibit SL/4]**.

16. At approximately 12:30pm the same day the Section 78 notice was served on all travellers on the land and it was explained to all of them what the notice meant and that they had to vacate the land by no later than 12noon on Friday 22nd June 2018.

17. At approximately 1pm on Friday 22nd 2018 I and other Planning Enforcement Staff visited the land and noted that all travellers had left the site.

3rd July 2019. Clematis Close, Harold Hill

18. On Wednesday 3rd July 2019 the Planning Enforcement service was informed that a group of travellers had arrived at Clematis Close, Harold Hill and had parked on grass verge which forms part of the public highway.

19. On Thursday 4th July 2019 I undertook a site visit in order to gather photographic evidence as to the number of caravans on the green verge, I noted 3 caravans. I took 2 photographs. I produce and am shown these photographs as **[Exhibits SL/5 and SL/6]**.
20. On Friday 5th July 2019 myself and Planning Enforcement colleagues attended the site and served the travellers with a notice to leave the site under Section 77 of the Criminal Justice and Public Order Act 1994. One of the travellers who we know as Kevin told us that it is their intention to stay within the vicinity for some time and that he was fully aware of the procedures that we have to undertake. This group of travellers are the same as one that we had to deal with on a number of sites during 2018. The notice directed the travellers to vacate the site by 12noon Monday 8th July 2019. I produce and am shown the notice as **[Exhibit SL/7]**.
21. On Monday 8th July 2019 our colleagues from the Havering Parks Police attended the site on my behalf to see if the travellers had complied with the Section 77 Notice. It was confirmed that the travellers remained on the grass verge, 3 photographs were supplied to me. I produce and am shown the photographs as **[Exhibits SL/8, SL/9 and SL/10]**.
22. On Tuesday 9th July 2019 instruction and information was given to the Legal Services team to prepare and request a summons for the travellers to attend the Magistrates' Court.
23. On Wednesday 10th July 2019 a copy of the Magistrates Court summons and my witness statement were served by my Planning Enforcement colleagues on all travellers at the site. Court attendance set for 10am Friday 12th July 2019. I produce and am shown the summons and accompanying papers as **[Exhibit SL/11]**.
24. On Friday 12th July 2019 I attended Barkingside Magistrates Court and was represented by Counsel. I gave evidence to the court and was granted a S78 order for the travellers to leave the site by 12noon Saturday 13th July 2019. The order was served upon the travellers the same day. I produce and am shown the papers served as **[Exhibit SL/12]**
25. On Saturday 13th July 2019 the travellers vacated this site.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed:  _____

Name: Steve Lomas

Date: 18th July 2019

Claimant: LB Havering
Gary Berkeley
Exhibits: GB01- GB21
Date: 19.07.2019

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

Claim Number: _____

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF GARY BERKELEY

I, Gary Berkeley, employed by Havering Council as a CCTV Operator
WILL SAY AS FOLLOWS:-

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts stated in this statement are within my own knowledge unless stated otherwise. Where facts are outside my own direct knowledge they are true to the best of my knowledge and belief.

2. All CCTV stills were obtained from footage. The name and address of the place I have downloaded the CCTV footage from is London borough of Havering CCTV control room, Mercury house RM1 3SL.
3. The format of recording is (Digital) CCTV footage has a 1 minute and 50 seconds time delay. The CCTV system is "TECKTON", and consists of 80 cameras. These cameras cover the following areas, respectively – Romford - Angel way. The footage downloaded is from 14/07/2016 and 19/07/2016.

14th July 2016 11.33hrs

4. On Thursday 14th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel way car park. Our camera 31+48 was monitoring the site from a far position. At approximately 11:33 a.m. I noticed a white dumper truck enter the car park grounds, it looked like it was loaded up with building materials. As I focused the camera in to investigate I noticed a white male get out of his truck, he started to cover his front and back number plates. I took 2 x still pictures of the plates that had been covered as well as a clear picture of the male. I produce and am shown these still as **Exhibits GB01 - GB02 - GB03**. As I continued to monitor his suspicious behaviour he then got back in his truck and drove around the back of the car park where he then emptied the contents of his van onto the ground. Once the van was emptied he parked up and removed the sheets that were covering the plates. The registration that was displayed on the truck was - NC03 MPY. I produce and am shown **Exhibit GB04**. When these CCTV stills were taken the CCTV system time was shown as 11:33hrs.

14th July 2016 12.33pm

5. On Thursday 14th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31+48 was monitoring the site from a far position. At approximately 12:33pm I noticed a white dumper truck enter the car park grounds, it looked like it was loaded up with building materials in heavy duty bags. As I focused my camera in to investigate I noticed a white male get out of his truck, and he started to remove his front and back number plates. I took 2 x still pictures of the plates that had been removed as well as a clear picture of the male who removed the plates. Produce and am shown these stills as **Exhibits GB05 - GB06 - GB07**. As I continued to monitor his suspicious behaviour he then got back in his truck and drove around the back of the car park where he then emptied the contents of his van onto the ground. Once the van was emptied he parked up and put his number plates back on his vehicle. The registration that was displayed on the truck was - EX54 EJJ. I produce and am shown **Exhibit GB08**. When these CCTV stills were taken the CCTV system time was shown as 12:33hrs.

14th July 2016 14.23pm

6. On Thursday 14th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel way car park. Our camera 31+48 was monitoring the site from a FAR position. At approximately 14:23Am I noticed a white dumper truck enter the car park grounds; it looked like it was loaded up with Building materials. As I focused my camera in to investigate I noticed a white male drive his truck into the car park where he reversed his van up and He then emptied the contents of his van all over the floor. I took 3 x still pictures of the trucks contents being emptied on the floor which I produce and am shown as **Exhibit GB09 – GB10 – GB11**. I also produce and am shown 1 x still picture of the driver which has been as

Exhibit as GB12. The registration number which was on the truck was PO54-UEB. When these CCTV stills were taken the CCTV system time was shown as 14:23hrs.

14th July 2016 14.53pm

7. On Thursday 14th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31+48 was monitoring the site from a far position. At approximately 14:53pm I noticed a white dumper truck enter the car park grounds; it looked like it was loaded up with garden materials. As I focused my camera in to investigate I noticed 2 x white males get out of their truck. They then started to take off the front and back number plates. I took 2 x still pictures of the plates that had been removed as well as a clear picture of the male. I produce and am shown these photos as **Exhibit GB13 & GB14**. As I continued to monitor their suspicious behaviour the driver then parked up and started speaking with several other males. After a short while the driver of the truck puts his number plates back on, and leaves the car park with an {empty} truck. The registration that was displayed on the truck was - EY51 CVA. I produce and am shown **Exhibit GB15**. When these CCTV stills were taken the CCTV system time was shown as 14:53hrs

19th July 2016 12.03pm

8. On Tuesday 19th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel way car park. Our camera 31+48 was monitoring the site from a FAR position. At approximately 12:03Am I noticed a white dumper truck enter the car park grounds; it looked like it as loaded up with Building materials. As I focused my camera in to investigate I no iced' a white male drive his

truck into the car park where he then covered his front and back registration plates with a black sheet. He then emptied the contents of his Van all over the floor. I took 2 x still pictures of the trucks contents being emptied on the floor which I produce and am shown as **Exhibits GB16 – GB17**. And 1 x still picture of the driver which I produce and am shown as **Exhibit GB18**. The registration number; which was on the truck was NC03-MPY

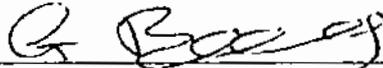
When these CCTV stills were taken the CCTV system time was shown as 12:03hrs.

19th July 2016 14.44pm

9. On Tuesday 19th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31+48 was monitoring the site from a FAR position. At approximately 14:44pm I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 3 x still pictures which I produce and am shown as **Exhibits GB19 - GB20 – GB21**. The registration that was displayed on the Van was - Y453-WGJ. When these CCTV stills were taken the CCTV system time was shown as 14:44hrs.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true

Signed 

Name: Gary Berkeley

Date: 19/07/19

Claimant: LB of Havering
Exhibits: MF01- MF54
Date :

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

Claim Number: _____

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF MATT FAWCETT

I Matt Fawcett employed by Havering Council as a CCTV Operator WILL SAY AS FOLLOWS:-

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts stated in this statement are within my own knowledge unless stated otherwise. Where facts are outside my own direct knowledge they are true to the best of my knowledge and belief.
2. All CCTV stills were obtained from footage. The name and address of the place I have downloaded the CCTV footage from is London

borough of Havering CCTV control room, Mercury house RM1 3SL. The format of recording is (Digital) CCTV footage has a 1 minute and 50 seconds time delay. The CCTV system is "TECKTON" and it has 80 cameras.

18th July 2016 10:28 hrs

3. On Monday 18th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 33 - 48 was monitoring the site from a far position. At approximately 10:28Am I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate I noticed a white male open the back doors to his transit van where he then started pulling out loads building materials and threw them out onto the car park floor. I then printed out 3 x still pictures which I produce and am shown as **Exhibits MF01 - MF02 - MF03**. The registration that was displayed on the Van was- FY55-0ZC. When these CCTV stills were taken the CCTV system time was shown as 10:28 hrs.

18th July 2016 10:57 hrs

4. On Monday 18th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel way car park. Our camera 33- 48 was monitoring the site from a far position. At approximately 10:57am I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate noticed a white male open the back doors to his transit van where he then started pulling out loads building materials and threw them out onto the car park floor. I then printed out 5 x still pictures which I produce and am shown as **Exhibits MF04 - MF05 - MF06 - MF07 - MF08**. The registration that was displayed on the Van was- BL55-FAK. When

these CCTV stills were taken the CCTV system time was shown as 10:57 hrs

18th July 2016 12:36 hrs

5. On Monday 18th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31- 33- 48 was monitoring the site from a far position. At approximately 12:36pm I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate I noticed a white male open the back doors to his transit van where he then started pulling out loads building materials and threw them out onto the car park floor. I then printed out 5 x still pictures which I produce and am shown as **Exhibits MF09 - MF10 - MF11 - MF12 – MF13**. The registration that was displayed on the Van was- BL55-FAK. When these CCTV stills were taken the CCTV system time was shown as 12:36 hrs.

18th July 2016 13:17 hrs

6. On Monday 18th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31+33+48 was monitoring the site from a far position. At approximately 13:17pm I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 3 x still pictures which I produce and am shown as **Exhibits MF14 - MF15 - MF16**. The registration that was

displayed on the Van was-CU53-EYR. When these CCTV stills were taken the CCTV system time was shown as 13:17 hrs.

18th July 2016 15:54 hrs

7. On Monday 18th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31- 48 was monitoring the site from a far position. At approximately 15:54pm I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate I noticed a white male drive his van to the rear of the carpark where he reversed up and he emptied the contents of his van all over the floor. I then printed out 4 x still pictures which I produce and am shown as **Exhibits MF17 - MF18 - MF19 - MF20**. The registration that was displayed on the Van was- BL55 FAK. When these CCTV stills were taken the CCTV system time was shown as 15:54 hrs.

18th July 2016 17:25 hrs

8. On Monday 18th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31+48 was monitoring the site from a far position. At approximately 17:25pm I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 4 x still pictures which I produce and am shown as **Exhibits MF21 - MF22 - MF23 - MF24**. The registration that was displayed on the Van was - YC54-GFY. When these CCTV stills were taken the CCTV system time was shown as 17:25 hrs.

20th July 2016 09:33 hrs

9. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 33+48 was monitoring the site from a far position. At approximately 09:33pm I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck. all over the floor. I then printed out 2 x still pictures which I produce and am shown as **Exhibits MF25 - MF26**. The registration that was displayed on the Van was- CU53-EYR. When these CCTV stills were taken the CCTV system time was shown as 09:33 hrs.

20th July 2016 10:40 hrs

10. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 48 was monitoring the site from a far position. At approximately 10:40Am I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 2 x still pictures which I produce and am shown as **Exhibits MF27 - MF28**. The registration that was displayed on the Van was- YC54-GFY. When these CCTV stills were taken the CCTV system time was shown as 10:40 hrs.

20th July 2016 10:44 hrs

11. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel way car park. Our camera 48 was monitoring the site from a far position. At approximately 10:44am I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera on to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 2 x still pictures I produce and am shown as **Exhibits MF29 - MF30**. The registration that was displayed on the Van was - YC54-GFY. When these CCTV stills were taken the CCTV system time was shown as 10:44 hrs.

20th July 2016 11:58 hrs

12. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 48 was monitoring the site from a far position. At approximately 11:58Am I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate I noticed a white male open the back doors to his transit van where he then started pulling out loads building materials and threw them out onto the car park floor. I then printed out 3 x still pictures which I produce and am shown as **Exhibits MF31-MF32 - MF33**. The registration that was displayed on the Van was - YK14-0VM. When these CCTV stills were taken the CCTV system time was shown as 11:58 hrs.

20th July 2016 12:39 hrs

13. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 48 was monitoring the site from a far position. At

approximately 12:39pm I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 4 x still pictures which I produce and am shown as **Exhibits MF34 – MF35 – MF36 – MF37**. The registration that was displayed on the Van was- CU53-EYR. When these CCTV stills were taken the CCTV system time was shown as 12:39 hrs.

20th July 2016 13:36 hrs

14. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel way car park. Our camera 31+48 was monitoring the site from a far position. At approximately 13:36pm I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate noticed a white male open the back doors to his transit van where he then started pulling out loads of black bags and building materials and threw them out onto the car park floor. I then printed out 2 x still pictures which I produce and am shown as **Exhibits MF38 – MF39**. The registration that was displayed on the Van was -YKI 4-0VM. When these CCTV stills were taken the CCTV system time was shown as 13:36 hrs.

20th July 2016 14:03 hrs

15. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31+48 was monitoring the site from a far position. At approximately 14:03pm I noticed a white dumper truck enter the car park grounds, it looked like it was loaded up with Building materials in

heavy duty bags. As I focused my camera in to investigate I noticed a white male reversing his truck. As I continued to monitor his suspicious behaviour he then emptied the contents of his truck onto the ground. I then printed out 2 x still pictures which I produce and am shown as **Exhibits MF40 – MF41**. The registration that was displayed on the truck was- YC54 - GFY. When these CCTV stills were taken the CCTV system time was shown as 14:03 hrs.

20th July 2016 14:10 hrs

16. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31+48 was monitoring the site from a far position. At approximately 14:10pm I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 3 x still pictures which I produce and am shown as **Exhibits MF42 – MF43 – MF44**. The registration that was displayed on the Van was- BG52-HWK. When these CCTV stills were taken the CCTV system time was shown as 14:10 hrs.

20th July 2016 14:32 hrs

17. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 33+48 was monitoring the site from a far position. At approximately 14:32pm I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate I noticed a white male open the back doors to his transit van where he then

started pulling out loads building materials and threw them out onto the car park floor. I then printed out 2 x still pictures which I produce and am shown as **Exhibits MF45 – MF46**. The registration that was displayed on the Van was- BL55-FAK. When these CCTV stills were taken the CCTV system time was shown as 14:32 hrs.

20th July 2016 14:33 hrs

18. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 33-48 was monitoring the site from a far position. At approximately 14:33pm I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 3 x still pictures which I produce and am shown as **Exhibits MF47 – MF48 – MF49**. The registration that was displayed on the Van was - CU53-EYR. When these CCTV stills were taken the CCTV system time was shown as 14:33 hrs.

20th July 2016 15:16 hrs

19. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 31+48 was monitoring the site from a far position. At approximately 15:16pm I noticed a white Transit van enter the car park grounds. As I focused my camera in to investigate I noticed a white male open the back doors to his transit van where he then started pulling out loads building materials and threw them out onto the car park floor. I then printed out 2 x still pictures which I produce and am shown as **Exhibits MF50 - MF51**. The registration that was displayed

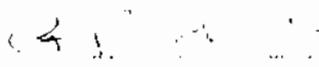
on the Van was- YK14-0VM. When these CCTV stills were taken the CCTV system time was shown as 15:16 hrs.

20th July 2016 15:56 hrs

20. On Wednesday 20th July 2016 I was on day duty and was advised that a large number of travellers had pitched up on our Angel Way Car Park. Our camera 33+48 was monitoring the site from a far position. At approximately 15:56pm, I noticed a white dumper truck enter the car park grounds it looked like it was loaded with building materials. As I focused my camera in to investigate I noticed a white male pull up in his dumper truck and he started emptying the contents of his truck all over the floor. I then printed out 3 x still pictures as **Exhibit MF52 – MF53 – MF54**. The registration that was displayed on the Van was - CU53-EYR. When these CCTV stills were taken the CCTV system time was shown as 09:33 hrs.

21. I believe that the facts stated in this witness statement are true

Signature: 

Signature witnessed by: 

Date: 17.09.16

Claimant
M Thomas
First
Exhibits: MT1-3
Date:

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

Claim Number: _____

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF MARTYN THOMAS

I, Martyn Thomas, Head of Spatial Planning at the London Borough of Havering, WILL SAY AS FOLLOWS

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above defendants. The facts contained within this statement are within my own knowledge, unless otherwise stated, and are true. Those facts outside of my own direct knowledge are true to the best of my knowledge and belief.
2. I work for the London Borough of Havering as the Head of Spatial Planning in the Council's Planning Department of the Neighbourhoods Directorate. My responsibilities include leading the preparation of the Council's land-use and transport planning policy strategies and ensuring that these contribute to the

Council's wider place-making role in creating a borough where people want to live and businesses wish to invest. I have been asked to provide a statement which concerns the current provision for Gypsy and Traveller sites within the London Borough of Havering Local Plan.

3. The Havering Local Plan Examination commenced in October 2018. After two weeks of hearings it was stayed pending further work in the areas of housing, parking and Gypsy and Traveller matters. Responses in relation to Gypsy and Traveller matters was submitted at the end of March 2019. This work encompassed a thorough review of the Gypsy and Traveller Accommodation Assessment which supported the Local Plan (this is Policy 11 – Gypsy and Traveller Accommodation, which took account of the GTAA update report from March 2019). It also included a robust pitch deliverability assessment study to support revisions to Policy 11.
4. The Local Plan Examination in Public re-convened at the end of May 2019 for two days, of which a day was allocated to Gypsy and Traveller matters and the consideration of the items referred to above (revised GTAA, revised Policy 11 and supporting information). Following the hearings, the Inspector has asked the Council to conduct further work on these matters, namely, the preparation of an updated GTAA, field work, mapping the potential of sites to accommodate pitches (both present and future), and associated further revisions to Policy 11. That work is being undertaken by senior officers, with support from Counsel (QC), and will be reviewed by senior officers and the Leader of the Council before being submitted to the Inspector.
5. It will be some time before the Policy is finalised, and there will be a statutory 6 week consultation on the proposed Modifications to the Local Plan in the event that the Inspector accepts the further work.
6. I produce and am shown **Exhibit MT1** (the Havering GTAA Update report dated July 2019).

7. I produce and am shown **Exhibit MT2** (the draft revised Policy 11 document April 2019).
8. I produce and am shown **Exhibit MT3** (the response to the Inspector dated November 2018).
9. I produce and am shown **Exhibit MT4** (response to the inspector dated June 2019).
10. Paragraphs 36 to 41 of **Exhibit MT3** address the issue of unlawful encampments and the impact these have upon the assessment of traveller provision in the plan. The inspector addresses the increase in unauthorised encampments and asks for a reassessment of transit provisions. The response confirms that the presence of unlawful encampments within the borough is not a result of need, and that the provision of further transit sites would not address the concerns relating to those unlawful encampments within the borough.
11. Paragraph 45 of **MT3** confirms, following from paragraph 43, that 128 of the 135 pitches needed within the first 5 years of the plan can be delivered within existing site boundaries. The 7 pitches that cannot be met are a result of land ownership issues and the Council is working to resolve this through the use of other land. The sites that may have the potential to meet this need have been identified and I am informed that none of them fall within the land sought to be covered by the injunction.
12. The above is reflected in the draft revised policy at **MT2** which is currently under revision following the recent updates.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: Martyn Thomas

Martyn Thomas

Date: July 24 2019

Claimant
M Wallace
First
Exhibits
Date: _____

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

(1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE
CLAIM FORM

(2) PERSON UNKNOWN

Defendants

WITNESS STATEMENT OF MELVIN WALLACE

I, Melvin Wallace, Councillor at the London Borough of Havering, Romford Town Hall, Romford, WILL SAY AS FOLLOWS:-

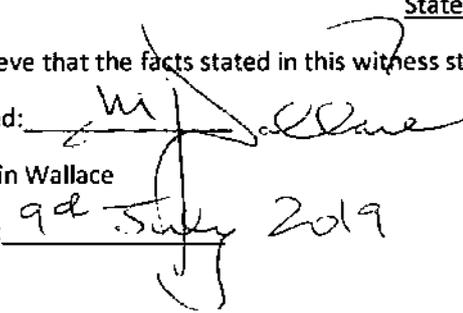
1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from my own direct knowledge unless stated otherwise. Those facts outside my own direct knowledge are true to the best of my knowledge and belief.
2. I am a Councillor with the London Borough of Havering. I represent Squirrels Heath Ward and have held this position for 5 years. My responsibilities included, at the time, being responsible for cultures and communities, ~~and currently~~ ^{*} include sitting on the OneSource Transition to Trading Steering Group. My day to day responsibilities include representing residents of my ward, listening to their concerns and raising those concerns with the Council. 
3. As part of my responsibilities, I hear and act upon concerns raised to me by local residents. I am aware that the London Borough of Havering has experienced a number of unauthorised encampments for a number of years and that this has created significant community tension and given rise to a number of complaints.

Claimant
M Wallace
First
Exhibits
Date: _____

4. I particularly recall an unauthorised encampment at the Havering Atte Bower Cricket Club, which took place in the summer months of 2017. The ground was broken into the land cutting off a padlock to the gate, and up to eight caravans with various vehicles encampment upon the ground, on the cricket pitch itself. There were wheel marks on the main square.
5. I am a member of this cricket club. I requested that the travellers remove themselves from the ground, however they said that they would remain in place for some 10 days as there was a wedding taking place in the local area. I contacted the Police for assistance, however they did not utilise their s.61 powers, on the basis that the club should obtain its own eviction order.
6. The Cricket Club therefore engaged solicitors and obtained an eviction order. This took just under a week. There was rubbish everywhere. We couldn't play on the home ground on the Saturday. This cost around £3,600.00 to the Club.
7. The bailiffs and local police worked together to remove the unauthorised encampment. This was not a quick procedure and took some hours. The travellers had been on the ground for four days, and rubbish was left for the club to clear. Various items of value were stolen including a hosepipe and furniture.
8. I recall also at least twice in the last 3 years, that the local Tesco Store at Gallows Corner has experienced unlawful encampments, which requires the store to be closed for client and staff safety, and to prevent thefts from the store.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: 

Melvin Wallace

Date: 9th July 2019

Claimant
T Lawal
First
Exhibits
Date: _____

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

(1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE
CLAIM FORM

(2) PERSON UNKNOWN

Defendants

WITNESS STATEMENT OF TELE LAWAL

I, Tele Lawal, Councillor at the London Borough of Havering, Romford Town Hall, Romford, WILL SAY
AS FOLLOWS:-

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from my own direct knowledge unless stated otherwise. Those facts outside my own direct knowledge are true to the best of my knowledge and belief.
2. I am a Councillor with the London Borough of Havering. I represent Heaton Ward and have held this position for over one year. My responsibilities include appointments to the Children & Learning Overview & Scrutiny Sub-Committee, Crime & Disorder Sub-Committee and the Standing Advisory Council on Religious Education.
3. My day to day responsibilities include representing residents of my ward, listening to their concerns and raising those concerns with the Council. I am aware that the London Borough of Havering has experienced a number of unauthorised encampments for a number of years and that this has created significant community tension and given rise to a number of complaints.

Date: _____

4. I am aware of an unlawful encampment which occurred at the Pompadours Public House, as I am a resident of Harold Hill, and received a number of complaints about this encampment within my capacity of a Councillor for the Ward. This encampment was reported widely in the Local Press, as the encampment lasted from March to May 2018. I produce and am shown **Exhibits TL1 – 6** a number of screen prints and photographs that have been produced by the Local Press (Romford Recorder, Essex Live) at the time of the encampments, which demonstrate the extent of the fly tipping at the site. Between this period, in particular June, I visited the Pompadours site regularly, and I produce photographic evidence shown as **Exhibits TL7** at the time of the encampments and after, which demonstrates the extent of the fly tipping at the site.

5. I am also aware of a number of complaints made by residents of Wincanton Road in Havering. The complaints concern a number of encampments which have occurred on a strip of open green land which takes the form of a public green along Wincanton Road. A 'Wincanton Road Residents Group' was set up in response to the degree of unlawful encampments experienced in the area. The lead resident of the group reported:
 - a. Threats and intimidation
 - b. Property damage
 - c. Theft
 - d. Attempted Break Ins
 - e. Windows being broken
 - f. Cars being 'keyed'
 - g. Brick walls being kicked down
 - h. Stones being thrown at residents
 - i. Sexual harassment
 - j. Invasion of privacy
 - k. Open defecation
 - l. Horse manure/dog fouling
 - m. Dirty nappies and tampons being left in the topen
 - n. Rubble and builder's waste

Date: _____

6. I am aware that significant complaints were received following 4 encampments in 2016 and 3 in 2017. The lead resident reported the travellers breaking into resident's gardens causing damage and disruption. A number of residents were elderly and had stones thrown at them. The travellers were also reported to walk up to front windows and stare into the resident's properties.
7. The resident also reports that the local postman was surrounded by a number of travellers and was subject to a brick attack when trying to evade the area. I am told that Royal Mail temporarily suspended deliveries in the area due to safety concerns for the postmen.
8. The concerns and fears of the residents is palpable, and they regularly report feeling like 'prisoners' in their own home during the currency of an encampment; they are genuinely fearful of stepping out of their homes, with an encampment within metres of their front doors, given the violent and anti-social behaviour which is directed toward them.
9. Another resident has contacted the Council on 23 June 2019 to report that their 'quiet and peaceful' residence in my ward, since 1994, has become disrupted as a result of the types of unauthorised encampment that occur in the area. He reports having three tipper trailers being stolen, which costs £5,000.00 each, and that his garage had been broken into with £2,500 worth of tools being stolen.
10. Another resident had cause to complain on 21 June 2019 regarding encampments at Farrington Avenue. He reported defecation behind neighbours fences, leaving dirty toilet tissue to blow in the wind. Children from the encampment were said to be running around stealing children's toys from resident's properties. Loud music was reported as being played at 2.a.m. Animal abuse was reported, with a dog being picked up and thrown onto its back. Finally there were reports of a pickup truck making fly tips every night around midnight.
11. I am aware of further unlawful encampments in last year which occurred at Gooshays Gardens, and caused significant community tension due to the land the Travellers acquired. In addition, Tesco's at Gallows Corners was occupied by Travellers twice, and there are reports of individuals being threatening towards staff, which resulted in the closure of our local supermarket.

Date: _____

12. On the 13 August 2018, I was notified by my resident of an unlawful encampments at the piece of grass at the beginning of Clematis Close. My resident felt intimidated and was disheartened by both the Council and Metropolitan Police response. When liaising with the Council Officer on this matter via email on 15 August 2018, it was stated that before they occupied the Council land at Clematis close, they were at St Neots Road, and seemed to be moving around Harold Hill. From correspondence received, they were served a Notice of eviction, which was ignored, and then Council then moved on to obtaining a court summons.

13. On 18 August 2018, I decided to visit the Briar Road Estate to see if the Travellers had vacated. Around 13:00 PM, I saw the travellers were at Briar Road opposite Lavender Close. The nearest address to where they were situated: 3A Lavender Close, Romford, RM3 8AU. I began to take pictures of the Travellers cars etc, in order to notify the Council. I was approached by Traveller who was Caucasian male, middle-aged as slim build. He began to verbally abuse me and raise his fist to scare me off.

14. I decided to call the Council Out of Hours Line, and whilst speaking to a Council Staff, the man again began to be abusive towards me. After logging my complaint, residents emerged to diffuse the situation, and advised I leave so that I would not be harmed. Currently, Travellers have just left that same site this year.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: _____



Tele Lawal

Date: 12th August 2019 _____

Claimant
Name: Ilker Dervish
First
Exhibits:
Date: 20.06.2018

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF ILKER DERVISH

My name is Ilker Dervish. I am the Chairman of London Riverside (BID) Limited based at Estate House, Fairview Industrial Park, Marsh Way, Rainham, Essex, RM13 8UH WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts stated in this statement are within my own knowledge unless otherwise stated. Where the facts are not in my knowledge they are true to the best of my knowledge and belief.

2. I am the Chair of the London Riverside BID, the BID is a business improvement district not-for-profit company. At present my organisation represents industry situated along the eastern corridor which begins at the boundary of Havering and Barking and Dagenham and finishes at the Essex border, in this 4.5 square kilometre area, businesses and organisations such as Ford, the GLA and Tilda Rice own and control large areas of industrial and brown field land areas.
3. A BID is a business led and business funded group that gather under The Business Improvement Districts (England) Regulations 2004 to gain funding, encourage regeneration amongst businesses in the locality and improve the area. The BID's aim is to protect current businesses that are located in the designated area and to promote and attract inward investment in the area from other businesses. The organisation has clean, green and secure agenda which are supported by the Mayor of London and the local authorities that are within its boundaries.
4. In the past two years the members of the BID have experienced two problems which I believe are related; the first is organised groups that are systematically identifying sites within the BID area and carrying out large scale fly tipping causing a detrimental effect on the local amenity of the area costing many thousands in clear up and disposal costs and forcing land owners to increase their expenditure on extra security, CCTV and perimeter fencing.
5. The second issue is that over the last two years there has been a significant increase in unauthorised traveller encampments on the land owned and controlled by members of the BID. The travellers that have carried out these unauthorised encampments have on many occasions entered the land by force or by criminally damaging the entrance gates or perimeter fences to gain access. Occasionally, security guards have been threatened and assaulted in the process. On one occasion the security guard was set about by several travellers causing him physical harm leading to hospital treatment. On gaining access to the land the travellers have systematically fly tipped the land on a large scale industrial level, in some cases asbestos and human waste has been found in the fly tip which has quadrupled the cost of clearance.

6. On every occasion when the travellers have been evicted from site there has been clear evidence that the unlawful occupants have defecated and urinated on site. On some sites this resulted from long term encampment which includes anywhere between sixty to one hundred people. This has had a detrimental effect on the local amenity of the area and has health & safety implications to visitors of the land, to wildlife (the major RSPB site is adjacent to the BID area) and local users of neighbouring areas.
7. I can confirm that recently the incident I have just described happened at Consul Avenue, which is an area of land owned and controlled by one of our members. The incident took place on 1 August 2016 when travellers committed criminal damage to gain entry to the site. Up to twenty plus caravans and associated vehicles remained on the site for several days before they were lawfully evicted. The site was heavily fly tipped costing approximately £80,000.00 to clear.
8. As mentioned above, on this occasion one of our security staff was assaulted and I refer to the emails produced at **Exhibit ID/1**. The emails make some reference to land at Barking and Dagenham, as the BID area crosses both Havering and Barking and Dagenham. The area that falls within Barking and Dagenham is currently protected by their injunction, however the areas within Havering are currently vulnerable and without protection.
9. As a result of these incidents and there increasing frequency stake holders within the group have had to increase their security budget per year by 50%, land owners have had to try and secure entrances and perimeter fences to their land to try and prevent unlawful encampments, this is nearly impossible as their perimeter boundaries stretch for miles. The members have had to pay for clear up of the land that has been systematically fly tipped by these large organised groups. The BID itself have had to step the use of mobile patrols to monitor traveller movements, at a considerable cost to the business community.
10. The impact of this type of criminal and anti-social behaviour includes increased costs for security with associated management costs, clear ups for businesses, diversion of Government, Police and Local Authority resources and a growing

reluctance to invest in business (whether new or existing) in the area with corresponding loss of employment opportunities for the local community.

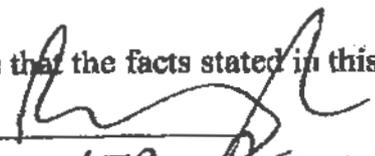
11. I can confirm that we have experienced the following encampments since 2016

- a. **Beam Reach – 13 March 2016** – On this occasion, twenty plus caravans forced entry into the site. Ten settled in 1-3 Salamons Way with the rest settling at Beam Reach 5. There was a static security guard at Beam Reach 5 and the travellers disconnected the electricity supply and intimidated the security guard into leaving the premises. The travellers broke into buildings on site, removed copper pipe and wiring, and fly tipped the location.
- b. **Havering Campus – 16 April 2016** – A significant fly tip was reported at this location.
- c. **Lamson Road – 3 May 2016 to 24 May 2016** -travellers attended this site on 3 May and remained there for a sustained period. It was reported by Steve Elliott that female members of his staff who arrive by train are nervous when walking past the encampment to attend their place of work, at Technology Desking Ltd, based at the location. Around 15 Caravans in total were reported, with fly tipping being photographed.
- d. **Lamson Road – 11 June 2016** – Travellers initially attended at Lamson Road and then moved to 'Simply Loo', and were then removed from that location by the private landowner on 13 June 2016. They moved to Dover Corner and were escorted by Police back to Lamson Road. A s77 Notice was then issued by the Council.
- e. **Salamons Way – 11 July 2016** – travellers removed concrete blocks in order to obtain access to the site, often carrying this out during darkness, and this was followed by large amounts of fly tipping.
- f. **Lamson Road – 23 July 2016** – Travellers attended the site and fly tipped with general debris. It was reported that this group had come from Romford and were a 'very aggressive' group. There was a reported 'stand off' between travellers, BID security and the Police. The travellers were scouting for alternative sites and broke into the farmers

field and RSPB site at Coldharbour lane. There were about 15 caravans blocking off the whole of Lamson Road.

- g. **Consul Avenue – 1 August 2016**, in which travellers attempted to re-entered the premises following a failed access attempt on 22 July 2016. As referred to previously, on this occasion it was reported to me that the security guard received actually bodily harm in the process.
- h. **Consul Avenue – 26 November 2016** - Travellers entered the site on 26th November, placing a sign claiming squatters rights on the gate. Up to 30 Caravans came onto the site and a s61 Notice was issued by the Police.
- i. **Brittons Playing Field 24 August 2017** – 4 caravans broke into this site in Rainham, increasing later to 12 caravans.
- j. **Tesco Council Car Park – 20 February 2018** – 25 caravans were involved in this incursion, with the encampment also moving into Queens Car Park in Hornchurch. Height restriction barriers were criminally damaged in order to facilitate access. There was significant fly tipping involved and it was reported that there were concerns of a high fire risk with the encampment being located next to the C2C railway line. Several different reasons for the arrival of the encampment were provided, including a funeral in Aveley, a funeral in London, or a wedding.
- k. **Cherry Tree Lane – 14 March 2018** – Travellers had broken into a cordoned off area at Tesco Car Park in Rainham. 25 Caravans arrived forcing the store to close, and a vehicular assault was attempted on one of the Tesco employees. The caravans then relocated to grassland opposite the store.
- l. **Old Elliott Loo Hire - 24 March 2018** – Travellers broke into this site and changed the locks, preventing access. Around 8 caravans were reported. Fly tipping was photographed at the site. Cash incentives were reportedly offered by the travellers in exchange for vacating the sites. The caravans relocated to the old Somerfields site and the head of security, Dil Singh, arranged for 20 guards to be on location. The travellers are reported to have threatened to return back to Simply Loos if they are evicted.

I believe that the facts stated in this witness statement are true.

Signed: 

Name: IKER PERUSKI

Date: 20/06/2018

Claimant
M Turrell
First
Exhibits
Date:

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF MICHAEL JOHN TURRELL

I Michael John Turrell currently employed as a Technical Service Manager with the NHS Property Services WILL SAY AS FOLLOW:

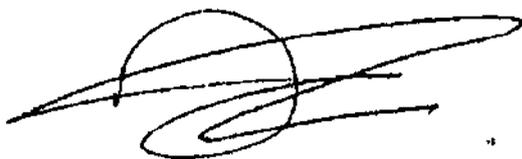
1. I make this witness statement in support of the Claimant's application and claim for an interim and final injunction. The facts in this witness statement come from my own knowledge or where they are not from my own knowledge are true to the best of my knowledge or belief. My duties as the NHS property services representative at the time of the incursion by a large group of travellers on the St Georges Hospital Site, Hornchurch in the London Borough of Havering.

2. On the morning of 19/04/2016 I was contacted by the head of the guarding company employed to secure St Georges and instructed that a large group of travellers had overwhelmed the on site security and driven a large amount of vehicles on to the site. I immediately left Green Lodge respite care centre in Redbridge and headed straight to St Georges. On entering site I found the entrance fencing down, the security lodge empty and groups of travellers moving around site. I also noticed the police helicopter circling above. Leaving site I found a police armed response vehicle parked just up the road who informed me the command unit was being set up at The Railway pub up the road and there had been accusations of threatening behaviour involving firearms. I liaised with deputy inspector heading up the response and was informed there was no evidence of firearms being used and as the travellers were now on private land it was no longer the Police's issue to deal with. With this in mind a steering group was set up by NHS PS involving the asset managers. An eviction notice was applied for and granted quickly via our solicitors, and a bailiff company (The Sheriffs Office) was employed to enforce the eviction. The bailiffs and the police were in attendance and enforced the eviction on the 26/04/2016, 7 days after the initial incursion.

3. Following the eviction an assessment to the site was carried out and identified a substantial amount of damage to the CCTV systems, the fabric and structure of buildings and street furniture. (for example lamp posts has been ripped from the ground). There were also two areas of significant dumped rubbish inclusive of household building detritus. The area around the location of the encampment also had significant amounts of rubbish including human excrement.

4. The total cost of legal, eviction and clearance was in excess of £59,000. This is not inclusive of the cost in hours of all employees of NHS PS involved in the process. NHS PS is owned by the secretary of state for Health so all costs are ultimately picked up by the taxpayer.

I believe that the facts stated in this witness statement are true.

A handwritten signature in black ink, consisting of several overlapping loops and horizontal strokes, positioned above the 'Signed:' label.

Signed:

Name: Michael John Turrell

Date: 12/09/2018

Claimant
A GOULDSTONE
First
Exhibits: AG1
Date: 29.10.18

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF ANDREW GOULDSTONE

I, Andrew Gouldstone, currently employed as the Senior Site Manager for the RSPB Rainham Marshes nature reserve at New Tank Hill Road, Purfleet, Essex, RM19 1SZ, WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts in this witness statement come from my own knowledge unless otherwise

stated, where they are not from my own knowledge, they are true to the best of my knowledge and belief.

2. I am the Senior Site Manager responsible for land owned or controlled by the RSPB at Rainham Marshes in the London Borough of Havering. The land is managed by the RSPB of The Lodge, Patton Road, Sandy, Bedfordshire, SG19 2DL
3. On Saturday the 5th of November 2016 I became aware via a telephone call from our grazier, that travellers had entered the site from Ferry Lane (south) to set up an unauthorised encampment. There were two open back tipper Transit vans involved, one Vauxhall car, and two large caravans. They occupied an area just inside the main access gate to the site. To gain access to the site, they cut a chain and padlock.
4. The travellers stayed for 5 days, and when they left, the RSPB, which is a charity registered with the charities commission under charities number 207076, had to work with Havering council to clear 16 lorry loads of dumped rubbish – mostly clothing and shoes, but also other household and building waste - and also left a large skip of building waste. The total cost was paid for by LBH.
5. The site is grazed by cattle, belonging to our grazier.
6. The use of the site by travellers immediately creates concerns, as they leave the gate open as they enter and leave the site – this leads to a risk of cattle getting onto the public highway, and also puts the wellbeing of the cattle at risk. The cattle are also put at risk by the dumping of waste on the site.
7. Inevitably, site staff and our grazier are then limited with how we can

use the site and allow access to visitors. This leads to a feeling of powerlessness, frustration and intimidation.

8. Police were asked to attend on the 5th November 2016, which they did, and they spoke to the travellers about the issue of the gate and the cattle. The police suggested they had little power to intervene further.
9. We highlighted the sites status as a Site of Special Scientific Interest (designated under the Wildlife and Countryside Act). It is designated as Unit 11 of the Inner Thames Marshes SSSI. It is designated for its grassland and wetland habitats, and the wildlife that these habitats support, such as water voles, invertebrates and birds. Third party damage to a SSSI is an offence. It was also highlighted that the dumping of rubbish is an offence under the Environmental Protection Act. I produce and am shown **Exhibit AG/1** a copy of the designation.
10. The police departed after approximately ½ hour, giving us the telephone number for London Borough of Havering's enforcement team.
11. Subsequent calls to the police to request further action received no response, even when we passed on information confirming that the vehicles in question were untaxed.
12. RSPB eventually instructed bailiffs to evict, and this cost the charity £2,450 (excluding VAT).
13. Once contractors had removed the bulk of the rubbish, approx. 2 days of staff time was then spent tidying up the site, and making the site as secure as possible, to avoid a repeat incursion. This incurred additional costs to the charities limited funds.
14. Time and expense, including tractor fuel, was also incurred

by our grazier to leave a large agricultural trailer blocking the gate, as an additional precaution regarding site security immediately after this incursion. This has in turn made use of the site more difficult to ourselves and our grazier.

15. Earlier in the same year, 2016, during the summer, two other instances of incursion took place, by much larger groups of travelers. Additional security, which had been put in place at the time, was easily by-passed and entry had been forced without issue.

16. No payments were received from the travellers toward the costs incurred by the RSPB.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed: AD Gouldstone

Name: Andrew Gouldstone

Signed: 29 October 2018

Claimant: LB of Havering
First
Exhibits:
Date: 24.04.18

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF MATT AUSTIN

I, Matt Austin, employed by TESCO PLC in the position of UK Security Operations Manager (Safety, Security and Shrinkage) based from Shire Park, Kestrel Way, Welwyn Garden City, Hertfordshire, AL7 1GA. WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts stated in this statement are from my own knowledge unless stated otherwise. Where facts are outside of my own direct knowledge they are true to the best of my knowledge and belief.
2. This statement concerns the Tesco retail store at Romford Gallows Corner Tesco Extra (3120) Bryant Ave, Romford, RM3 0LI which is located within the London Borough of Havering and has had a total of 11 traveller incursions over the last 2 years.

3. The financial cost of evicting these incursions was £12,500.00. The financial loss of trade as a result of these incursions is £125,000.00. In this statement I will detail the encampments, starting with the most recent.
4. On the 18th April 2018 a group of travellers in four caravans occupied Tesco land at Bryant Ave, Romford, RM3 OLL. As a result of this incursion the store was forced to cease trading. The travellers were subsequently evicted. Our bailiffs attended on 19 April and the entire site had been cordoned off due to a traveller "pulling a shotgun" the previous night. The police had cordoned the site. It later transpired a customer had overstated the position due to their frustration at being unable to attend the store. After speaking with the travellers, the Martins family, the unlawful encampment left.
5. On the 11th April 2018 a group of travellers in one caravan have occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.
6. On the 27th March 2018 a group of travellers in seven caravans occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.
7. On the 14th March 2018 a group of travellers with four caravans occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.
8. On the 10th March 2018 a traveller in a caravan occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The traveller was subsequently evicted.
9. On the 8th March 2018 a group travellers in 8 caravans occupied Tesco land Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.
10. On the 18th January 2018 a group of travellers in four caravans occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.
11. On the 30th December 2017 a group of people in 7 caravans occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.
12. On the 8th November 2017 a group of travellers in one caravan occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.

13. On the 13th October 2017 a group of travellers in one caravans occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.
14. On the 4th September 2017 a group of travellers in Nine caravans occupied Tesco land at Bryant Ave, Romford, RM3 OLL. The travellers were subsequently evicted.
15. The Tesco retail store at Romford Roneo- Tesco Extra (3107) 300 Hornchurch Rd, Hornchurch, RM11 1PY is located within the London Borough of Havering and has had a total of 3 traveller incursions over the last 2 years. The financial cost of evicting these incursions was £3,500.00. There were no financial loss of trade as a result of these incursions.
16. On the 19th February 2018 a group of travellers in one caravan occupied Tesco land at 300 Hornchurch Rd, Hornchurch, RM11 1PY. The travellers were subsequently evicted.
17. On the 14th November 2017 a traveller in one caravan occupied Tesco land at 300 Hornchurch Rd, Hornchurch, RM11 1PY. The traveller was subsequently evicted.
18. On the 28th July 2017 a group of travellers in ten caravans occupied Tesco land at 300 Hornchurch Rd, Hornchurch, RM11 1PY. The travellers were subsequently evicted.
19. The Tesco retail store at Rainham- Tesco Extra (3086) Bridge Rd, Rainham, RM13 9YZ is located within the London Borough of Havering and has had a total of 5 traveller incursions over the last 2 years. The financial cost of evicting these incursions is £6,000.00. The financial loss of trade as a result of these incursions is £30,000.00.
20. On the 13th March 2018 a group of travellers with three caravans occupied Tesco land at Bridge Rd, Rainham, RM13 9YZ. The travellers were subsequently evicted.
21. On the 20th February 2018 a group of travellers in Eighteen caravans occupied Tesco land at Bridge Rd, Rainham, RM13 9YZ the traveller's were subsequently evicted.
22. On the 6th December 2017 a group of travellers in one caravan occupied Tesco land at Bridge Rd, Rainham, RM13 9YZ. The travellers were subsequently evicted.

23. On 17th June 2017 a group of travellers with three caravans occupied Tesco land at Bridge Rd, Rainham, RM13 9YZ. The travellers were subsequently evicted.

24. On the 8th June 2016 a group of approximately 25 people in eight caravans occupied Tesco land at Bridge Rd, Rainham, RM13 9YZ. The travellers were subsequently evicted.

25. I believe that the facts stated in this witness statement are true.

Signed:  _____

Name: MATT AUSTIN

Date: Tuesday, 24 April 2018

Claimant: LB Havering
Dil Singh
Exhibits: DS/01 – DS/04
Date: 19.06.2018

Claim Number: _____

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

(1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN
SCHEDULE 1 OF THE CLAIM FORM

(2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM
ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF DIL SINGH

I, Dil Singh, Security Manager of business address 90 New Road, Rainham, RM13 8RS will say as follows:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to section 222 Local Government Act 1972, section 187b Town Country Planning Act 1990 and section 1 Anti-Social Behaviour Crime and Policing Act 2014, against the above named Defendants. The facts stated in this witness statement are within my own knowledge, unless otherwise stated. Where facts are outside of my direct knowledge, they are true to the best of my knowledge and belief.

2. On Sunday 15th April 2018 at about 16:20pm, at 90 New Road Rainham RM13 8RS the premises was breached by travellers from both ends of the private road which services the premises. They cut the padlocks off the gate despite being told by security not to and forced entry on to the site. The security officers were hurt and were threatened and were told to leave the site.
3. The Police were called, and the company dispatched an emergency patrol unit however the Police advised us to apply for a court order and left. Unfortunately, the situation escalated. The travellers used foul language directed at the security officers, and they were racially abused (being called names such as 'paki', 'isis bomber', 'black nigger', 'Punjabi scum that wrap a cloth round your head', all of which were deeply offensive to our staff, and is something that no person should ever have to tolerate or experience.) One of the travellers forcibly snatched a chain for a gate from my colleague's hand and hurt her in doing so. The injuries, whilst minor, were still traumatic for my colleague.
4. The Police were called by the travellers and, upon arrival, the Police issued a Section 61 Notice requiring the travelers to leave. Over the following days the Police were dispatched several times and reminded the travellers that they must leave. However, they insisted that the Police did not provide the section 61 notice and, my impression was that this left the Police powerless.
5. We had provided security officers on the site so that they could protect the other part of the site and some containers which were being stored on site. We locked the internal gates, so the travellers could not enter. However, the travellers cut the padlocks to those gates and forced entry in to that part of the site also.
6. The Police agreed it was criminal damage however made no arrest. The Sergeant explained that they did not have enough resources (Police officers, social workers for the children, dog handling team for the dogs) to remove or arrest them.

7. We then had to organise removing a generator, fuel tanks, microwave and fridge from that part of the site as they were trying to steal them. Whilst the travellers were on site they caused great disruption.
8. The travelers disposed of rubbish they had collected in their vehicles throughout the day; they also disposed their own waste on the site; and they were defecating and urinating on site in front of some of the security officers even though toilets were available on site. The children were asking security officers if they would like to buy drugs or even if they would like to pay to have sex with the young girls on site; they were throwing stones and logs at the security officers; they broke glass windows with stones; they broke in to the containers and made a mess. They left the site on Tuesday 17th April 2018 by midday with the assistance of instructed bailiffs.
9. I noted most of the Vehicles belonging to the travellers with the following Registration Numbers: VHZ 6146, MW17 CWY, FL12 KVE, SM66 ULR, MW17 OSZ, SM66 ULR, FL12 KVE, IF2 3026 MF71889, MW17 OXH, YD53 KHN , EF08 TBY, ND53 OBJ VUI9541, ME2 1899, VUI9129.
10. **Exhibit DS/01** is shown to me as photograph of Travellers who were bringing in vehicles full of rubbish and dumping it on the site. **Exhibit DS/02** is shown to me as a photograph of the travellers, the ringleader and the police. **Exhibit DS/03** is shown to me as photographs of the white van of travellers and a piece of wood which was thrown at the security. **Exhibit DS/04** is shown to me as photographs of gates, smashed windows and mess caused inside the premises.
11. I am very disappointed with the support that is in place for this matter. I feel as if the law is very much one sided for travellers and does not adequately support private land owners in the circumstances I have described. I feel that all law abiding citizens are being disadvantaged in these circumstances when trying to protect their

legitimate business and private interests in a lawful manner. There is not enough support due to limited Police resources to prevent them from trespassing on private land and committing offences such as criminal damage, assault, fly tipping, driving with untaxed vehicles and displaying vehicle registration numbers which do not exist. The Police appear to take no action taken against them as they are not fined nor are their vehicles taken away. They are allowed to force entry without being arrested.

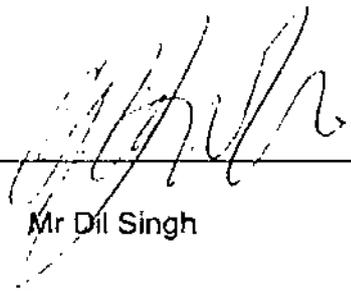
12. The time and cost of commencing and finalising civil proceedings to react to unauthorised encampments often means that significant damage and disruption has occurred before the remedy is obtained. I firmly believe that pro-active protection is necessary.

13. The travelers who have come to our site shout verbal and racial abuse, threaten people and hurt people without being arrested. They cause clear criminal damage and are not arrested. They litter roads and private land and are not fined or even asked to take away the waste (including harmful waste i.e. asbestos) that has been dumped by them. I feel as if this is unfair as they can continue to behave in this manner with little consequences and little protection for those who are adversely affected by it.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true

Signed _____


Mr Dil Singh

Dated: 19th June 2018

Claimant: LB Havering
First
Exhibits: ST001-004
Date: 16.06.18

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND XX DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF SIMON TREACY

1. My name is Simon Treacy. I am an Estates Manager for Tarmac Trading Limited ("the company") covering the company's property interests in the Greater London and South-east region.
2. I make this statement in support of the Claimant's claim for an injunction against the above named Defendants. My duties and responsibilities include managing the company's property interests that range from industrial locations in urban areas to interests more rural settings that include working and restored quarry sites.
3. Berwick Woods ("the site") is a freehold property owned by the company. It is a former sand and gravel quarry that was restored some years ago and extends to about 29 hectares in size (72 acres). The company manages the

land as a country park open to public access with a dedicated on site car park, public footpaths, nature trails, woodland and grassland areas. The company is quite proud of this site and its community use, having won the coveted Cooper Hayman trophy - a prestigious award given to the company by the Mineral Products Association in 2003. The award, given annually, recognises and celebrates outstanding achievements in quarry restoration. The site is looked after by the company's operational staff, locking the gate each night and reopening it each morning. Attached to this statement and **exhibited as ST001** is plan describing the extent of Tarmac's landholding at Berwick Woods.

4. On Thursday 19th April just after 10.30pm I was informed by our Area Operations Manager that the site had been broken into with a number of vehicles reported to have taken up occupation. It was reported to me that to gain access the site gate had been broken, in addition to the separate height restriction barrier having been cut off.
5. The following morning, on Friday 20th April, I contacted GRC Bailiffs to commence proceedings to recover possession of the site under common law powers. I was informed shortly afterwards by GRC Bailiffs that a team would attend the site that same day to attempt to evict the illegal occupants. I was kept informed of progress by GRC Bailiffs and at 7.30pm that evening received confirmation that all illegal occupants and associated vehicles had been evicted from the site.
6. On 20th April 2018 I received photographs from both GRC Bailiffs and also from our Area Operations Manager taken that same day, Friday 20th April, by email which showed extensive fly tipping had occurred at the site during the illegal occupation. The flytipping appeared to consist of mixed demolition and house clearance waste that had been tipped on grassland areas and footpaths alongside one of the sites woodland blocks. Quantities of broken glass and other waste had also been spread across the site's public car park. Attached to this statement are photographs that describe the extent of flytipping that occurred which are exhibited as **ST002, ST003 and ST004**. A list of some of the vehicles removed from the site provided to me by GRC Bailiffs is below:

LFZ 3026 Toyota Avensis
FL12 KVE Insignia WUI 094 tipper DL60 ELJ tipper
MW17 CWY red Seat Alhambra
SP66 EDY VW Passat
P739 NOG tipper blue
NB53 OBJ tipper
WUI 6544 tipper

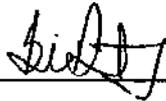
WUI 1094 tipper
EF08 TBY Zafira
YC54 JFY tipper

7. The financial impact to the company in dealing with the illegal occupation to date is estimated to be £13,175 + VAT which comprises of bailiff costs; gate and barrier repairs; the removal of the flytipped waste; and clearing and sweeping the site car park.

8. The local community are also impacted as a result of the incursion and are prevented from having access to the site. Due to the flytipped waste and the state of the car park, access is not permitted until the company is satisfied that the site can be safely reopened for public use. Within the first 24 hours after the site was shut, the company received over 30 telephone calls from the local community enquiring when the site will be reopened.

I believe that the facts stated in this witness statement are true.

Signed: _____



Name: Simon Treacy

Date: 16 June 2018

Claimant
Name:
Sebastien
HUNG
First
Exhibits:
SH/01-
SH/06
Date:
13.7.2018

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF SEBASTIEN HUNG

I, SEBASTIEN HUNG, a director of Regency Homes Limited, (Head Office) Manor of Groves, High Wych, Sawbridgeworth, Hertfordshire,

CM21 OJU, and site office at First Floor, 23/55 North Street, Romford
RM1 1BA WILL SAY AS FOLLOWS:-

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts stated in this statement are within my direct knowledge unless stated otherwise. Where facts are outside my own direct knowledge they are true to the best of my knowledge and belief.
2. I attach to this statement and am shown [Exhibits SH/01] which are photographs of the site detailed in this statement, taken during the period of occupation. I am shown [Exhibits SH/02] A copy of the Possession Order issued on 20 July 2016 by District Judge Foxwell. I am shown [Exhibits SH/03] a copy of a letter to Jim Ratcliffe London Borough of Havering this shows the cost to our clients of removing these travellers and associated works, which is £109,385.00.
3. I confirm that Regency Homes limited act as managing agents on behalf of Accalia Limited, Admiral Park, St Peter Port, Guernsey, GY1 3HB. Accalia Limited are the freeholders of a site in Angel Way, Romford which was formerly the site of a Decathlon Store, and which my company manage for them.
4. This is currently a construction site in the process of planning for a development of much needed housing within the Borough of Havering. It is normally secured with various types of hoardings, secured with padlocked gates and a security guard.
5. On the evening of Sunday 10th July 2016 our security guard was patrolling the site when he heard the metal gates of the being opened. The padlock had been cut off and one security guard was

confronted by travellers entering the site with caravans, vans and cars.

6. Our security guard had his own car on the site and tried to stop the unauthorised access to the site by the travellers, however there were too many and they threatened him with violence to make him stay away and permit access. I produce and am shown a copy of this email as **Exhibit SH/04**.
7. Police were present and advised our security guard merely to record the registration marks of the vehicles and not to intercept the travellers. Our security guard tried to explain that the land was private and that the travellers were trespassing, this was to no avail.
8. The travellers placed their own lock on the gates and following a long period of negotiation, they allowed our security guard to re-enter the site, from which he had been unlawfully ejected, in order that he could remove his car. He was told that if he did not do so, they would damage his car.
9. Police were recalled to the site and at about 5.30am on Monday 11th July 2016. The travellers had settled down on our land and Police stated there was nothing they could do and that as the owners we would need to apply to the court for a possession order.
10. Our site office is located immediately opposite the land in question and we experienced many problems over the whole period of the unlawful occupation of our land. The travellers refused to leave despite numerous requests that they do so.
11. The travellers were seen, by numerous members of Regency Homes Staff and the Security Company 1st Nationwide, bringing

rubbish to our land and fly-tipping it onto our land. The significant levels of waste dumped were a potential fire hazard and had fires been set the smoke may have been sufficient for the highways authority to close St Edwards Way which abuts the site.

12. They was also defecating and urinating on the site. This human waste quickly caused a smell which pervaded the area. This and the fly-tipped waste posed a major health hazard to those who wanted to use the site lawfully.
13. The travellers tapped into a water supply which Regency Homes Limited pay the bill. The abstraction of water from our supply without payment is, I understand, a criminal offence. I produce and am shown photographs as **Exhibit SH/05**.
14. I am aware that they have offered space for parking at the site they had taken control of, at a cost of £10 per day.
15. Regency Home Limited have not submitted a planning application or received planning consent for this site to become a traveller encampment.
16. The travellers ripped one of the metal gates from its post, leaving the other to blow back and forth into the road exposing road users to the risk of damage to their vehicles or injury to their person.
17. The traveller vehicles were frequently left on the yellow no stopping area on Angel Way. This obstructed the free flow of traffic, causing traffic jams. As the site became full of dumped rubbish the travellers commenced dumping rubbish on the road outside of the gate to our site. I produce and am shown photographs as **Exhibit SH/06**.

18. On Wednesday the 13th July 2016 Bailiffs acting on behalf of Regency Homes (V. Woodcock and Company) requested the travellers to leave our site. The travellers stated that they would not leave our land without a court order being served up on them. This delay in removing them from our site allowed them to dump more waste on the land further criminally contaminating the site.

19. Between Sunday 13th July 2016 and Wednesday 20th July 2016 when repossession was obtained the site went from being completely clear to being full to the brim - we witnessed them on an hourly basis coming and going with waste, covering their number plates and disposing of the same on our land.

20. I attach copies of photographs taken over the period of occupation. I produce these photos which are shown to me as [**Exhibits SH/01**].

21. We were very fortunate to have a good Solicitor who employed High Court Bailiffs and therefore we were able to gain possession of our land on the evening of same day, 20th July, 2016

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed..........
Dated..........

Claimant:
Trevor George
Massie
First
Exhibits: TM1-7
Date: 21.06.2018

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF TREVOR GEORGE MASSIE

I, Trevor George Massie, currently employed as Estates Manager-GLA Portfolio by Transport for London (TfL), Property Management at Floor 5, East Wing, 55 Broadway, London SW1H 0BD. WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts stated within this statement are within my own knowledge, unless otherwise stated. Where the facts are not in my direct knowledge they are true to the best of my knowledge and belief. As part of a shared service agreement between the GLA and TfL, I work exclusively on land and property in the ownership of GLA Land and

Property Limited, (GLAP), a subsidiary of the Greater London Authority and the Mayor of London's property holding company

2. I produce and am shown **Exhibits TM/1 - TM/7**

3. I am responsible for and manage land owned by GLA Land and Property Limited, the Mayor of London's property company which has substantial land holdings in the London Borough of Havering. The main land holdings include but are not limited to;
 - Beam Park 2 & 3, Thames Avenue RM9 6DE
 - 1-3 Salamons Way, RM13 9UL
 - Beam Reach 8, Easter Park,
 - Ferry Lane, RM13 9JY
 - Beam Reach 5, Consul Avenue, RM13 9UL
 - Beam reach 6, Consul Avenue, RM13 8EU

4. All the above mentioned sites are designated either for much needed housing for Londoners or for commercial purposes which will bring employment opportunities to the London Borough of Havering and supplier opportunities to local contactors. In addition transport infra structure will be included in the Beam Park development thus improving transport links for local people. A number of sites are already in development agreements with developers who in turn are in the process of producing detailed planning applications or carrying out initial surveys to determine future infra structure and foundation works.

5. As shown on the GLAP's Register of traveller incursions (**Exhibit TM/1**) since September 2014 there have been 9 unauthorised incursions onto GLAP land in the Borough of Havering. On each occasion, forced entry has been obtained and encampments set up. Unauthorised access onto GLAP sites has been gained by various means including cutting chains and padlocks, removing locked gates and fence panels, digging through bunds installed to prevent access and removing concrete blocks installed across entrance

gates. On each occasion the Police were called and they have supported where possible but it has been left to the land owner to secure evictions through the courts. On a number of occasions GLAP Managing Agents and contractor security staff were threatened and intimidated by those within the encampments when attempting to prevent access or record events occurring on GLAP land. When the Police arrive, the travellers disappear and therefore cannot be identified. This significantly inhibits the Police's ability to take appropriate action. If an injunction, with associated power of arrest, had been in place the Police would have had the power to immediately remove or arrest them if they continued to breach the terms of the injunction.

6. Produced and shown to me at **Exhibit TM/7** is a collection of incident reports. The report dated 20 November 2014 refers to threats of injury and damage to property. The email dated 3 October 2014 details an event whereby a security guard was assaulted by a traveller "*using his body to push me back*" in response to photographs being taken.
7. Usually when an unauthorised encampment occurs, the travellers gain access followed quickly by various types of vehicles attending site and depositing a variety of waste material including tyres, construction materials and waste, domestic household furniture including white goods, asbestos containing material and food waste. In doing so, the owner of the waste or the driver of the vehicle dumping the material is avoiding the payment of transport costs to disposal facilities, landfill tax and disposal costs. As GLAP sites are large, in one case over, 2 hectares it has been difficult to regain access to site whilst the travellers are on site to gather evidence to record these occurrences. It is only when the travellers have left site that the full extent of the fly tipping of waste can be seen. Photographic evidence has been provided to show the type and amount of waste left after incursions.
8. I produce and am shown the following exhibits

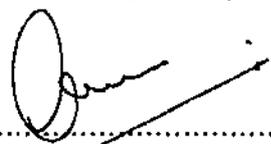
- a. **Exhibit TM/2 – Photographs from Beam Park 2 incursions, June 2014, August 2014 and November 2014**
 - b. **Exhibit TM/3 – Photographs from Beam Park 3 incursion, August 2014 and November 2014**
 - c. **Exhibit TM/4 – Photographs from Beam Reach 5 incursions, March 2014, November 2014, June 2016**
 - d. **Exhibit TM/5 – Photographs from Beam Reach 8 incursions, June 2016**
 - e. **Exhibit TM/6 – Photographs from Salmons Way incursions, March 2016**
9. The cost to GLAP, who are London tax payers, to evict travellers, clean up the dumped waste and to install more robust defensive measures is substantial. The total cost to remove fly tipped material left by travellers over three years has been £151,277. Over the same period GLAP has also expended over £71,180 in additional physical security measures to minimise further unlawful incursions. A further £34,190 of costs has also been incurred for legal fees and bailiff costs.
10. GLAP land is now being protected by the installation of bunds, trenches, concrete blocks, palisade fencing and concrete bollards. Having heavily protected sites could possibly result in:
- a. Reduced land values resulting from the perception of the area being less attractive to potential businesses or house builders. Anyone interested in developing on these sites would not offer a premium price for the land.
 - b. Additional clean up cost to the developer if the land is contaminated resulting from fly tipping of hazardous material thus reducing the profit return to the GLA resulting in less reinvestment in much needed housing.

11. In addition the result of the unauthorised access and dumping of waste material has a detrimental effect on local residents and businesses making it more difficult for organisations such as Londoneast-uk to attract new businesses to the area restricting the generation of additional business rates for the local authority and economic growth to the area..

12. In summary, a total of £256,646 inclusive of additional security measures and fees is estimated to be the cost of dealing with the 9 incursions. This level of expenditure cannot be sustained and action is required to immediately remove the travellers when they make an unauthorised incursion onto GLAP land. As stated previously, if travellers are removed immediately there is little opportunity to fly tip material onto GLAP land. If an injunction is in place the Police will have the power to immediately advise the unlawful occupiers to leave without the land owner having to secure an eviction through the court, such process taking enough time to allow the encampment to engage in significant fly tipping.

13. Urgent action is required to deal with these situations which will only become worse if those engaging in this activity realise that the Borough and Police have limited ability to implement evictions without a court order, and therefore I fully support this application for an injunction.

I believe that the facts stated in this witness statement are true.

Signed.....

Dated..... 21/6/18

Claimant: LBH
First
Exhibits:
Date: 13.06.2017

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND XX DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF ROBERT GLEED

1. My name is Robert Gleed I am employed by the London Fire Service as Station Manager F38 Romford & F39 Hornchurch at Hornchurch Fire Station. 42 North Street RM11 1SH. I make this statement in support of the Claimant's claim for an injunction against the above named defendants and others.
2. On 28 October 2016 at 10.22 I emailed Trevor Rockliff at the London Borough of Havering in respect to waste deposited at a traveller encampment located at the site of the former Palms Hotel on the A127 Southend Arterial Road, Romford.
3. The text of my message was "The concerns I have with the waste left behind by the travellers at Palms Hotel (A127) are the potential for a deliberate ignition. This has the potential to close one or both carriageways of the A127 due to smoke travel, the positioning of our vehicles and cordons for the safety of our crews. Also there may be the possibility of discarded LPG and/or other pressurised cylinders that bring their own problems if involved in a fire, i.e. cordons/exclusion zones whilst the cylinders go through our cooling processes."

4. Where the Fire Service has to engage in operations at such travellers sites the units are unavailable for fire emergencies elsewhere in London.

5. Across the country fires on land adjacent to main carriageways has caused serious concerns to Fire Officers.

I believe that the facts stated in this witness statement are true.

Signed: 

Name: ROBERT GLEED

Date: 13/6/17

Claimant
A Morgan
First
Exhibits:
Date: 31.10.18

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF AMY MORGAN

I, Amy Morgan, an Environmental Crime Officer, in the Enforcement Team, South East region, Herts and North London area, based at Welwyn Garden City office WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above defendants. The facts contained in this statement are within my own knowledge unless stated otherwise. Those facts outside of my own direct knowledge are true to the best of my knowledge and belief.
2. This statement relates to an ongoing Environment Agency investigation targeting an organised crime group responsible for illegal incursions and significant illegal deposits across North & South London, predominantly East London, West London,

Hertfordshire, Buckinghamshire, Bedfordshire and Surrey and surrounding counties.

3. The alleged activities appears to be for the significant financial gain and puts the environment at risk, undermines regulatory control, puts pressure on a limited Police resource and leaves landowners with significant clean-up costs.
4. The group was originally thought to contain 22 main suspects but over the last 9 months investigations have identified numerous other associates making a total of 77 potential suspects. A large number of these will be alias's so the true identity and number is not know at this time.
5. Also, the investigation to date has identified 184 waste carrying vehicles which have been seen on or near to one of the illegal waste sites. The majority of these vehicles are small transit type tippers modified to carry large volumes of waste.
6. A significant amount of the sites targeted by this group have been on private land. The clearance costs have been met by the landowner. Some sites have cost in excess of £250,000 to clear. We are investigating in excess of 60 sites which have been targeted by this group. However this has been a wide spread problem across London and bordering boroughs for over two years, with this well-known notorious group targeting Havering in 2016, then in 2017 Enfield and now, in 2018, Havering again.
7. The Modus Operandi (MO) which we have identified with this group is

- a. The site is accessed by cutting the lock off the outer security fence.
 - b. Once entry has been secured, by force if necessary, caravans are moved onto the site and occupants take up residence.
 - c. Children are deployed to control access to the site opening and closing the gate.
 - d. A notice is placed on the entrance to the site stating section 144 of the Legal Aid Sentencing & Punishment of Offenders Act does not apply. Section 144 makes squatting a criminal offence only in residential properties. Trespassing remains a civil offence on land and non-residential buildings and so does not carry a prison sentence.
 - e. They import and deposit waste on site. The waste is generally made up of construction waste (bathroom / kitchen refits) also general house clearance waste. They allow third parties to use the land to deposit waste. This will continue until the landowner makes an application to the Courts to have them evicted or the site becomes full.
 - f. The police see this as a civil matter and will not take any action until a court order is served requiring them to leave. (some police forces will serve a notice requiring them to leave)
 - g. The court bailiffs will enforce the injunction in conjunction with the police, however they have usually moved on before the eviction date and time, or, they leave if they have filled the site with waste
8. Currently we receive information of two new site a week, with no sign of this wide spread problem slowing down. This year we have attended sites in the Havering area which I will detail below. On

these sites I have seen large amounts of illegal deposits of waste and vehicles associated with the target groups-

9. Firstly, at Manor Way, Rainham, in April 2018, which was subject to an incursion on site where I saw the following vehicles –

a. YB08AXW – White Ford Transit, registered keeper Mr Michael McDonagh

b. SM66ULR – Silver Ford Ranger pickup registered keeper Mr Michael McDonagh

10. Secondly, and also in April 2018 I attended Rainham Trading Estate, New Road Rainham this site had been subject to a large deposit of waste, and on site I saw the following vehicles –

a. M66ULR – Silver Ford Ranger pickup registered keeper Mr Michael McDonagh

b. P739NOG – Grey Ford Tipper registered keeper Mrs Kathleen Stokes

11. These vehicles have also been associated with other incursions and illegal waste deposits

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: 

Name: Amy Morgan

Date: 31/10/2018

Claimant
Simon Elgar
First
Exhibits SE/01 -02
Date

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF SIMON ELGAR

I, Simon Elgar, currently employed as a Community Ranger by Forestry England (formerly referred to as The Forestry Commission) East of England Forest District, Santon Downham, Brandon; Suffolk, IP27 0TJ, WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts contained have been ascertained through examination of records held by

Forestry England and through checking with individuals involved in the incident referred in this witness statement. Where they are not from my own knowledge, they are true to the best of my knowledge and belief.

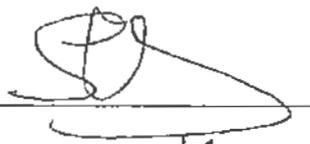
2. I produce and am shown attached to this statement [**Exhibits SE/1 – SE/2**]
3. This statement concerns land owned by Ingrebourne Valley Ltd (IVL), and managed by Forestry England (**FE**), at Ingrebourne Hill, Rainham Road, Rainham, Essex, RM13 8ST.
4. On Monday the 29th of February 2016 FE staff became aware that travellers had entered the site to camp at 08:00 as the FE office had received multiple phone calls from members of the public over the weekend stating approximately 12 caravans had accessed Ingrebourne Hill and set up on the grass meadow adjacent to Lake Stillwell. The FE office had been unmanned so the local team was unable to respond to this incident until the Monday morning.
5. Local staff visited site and found that recently installed boulders to prevent illegal access had been removed and a section of fence had been damaged in order to facilitate access. This is shown at [**Exhibit SE/1**]. With Police on site the local team visited members of the encampment to discuss their objectives and enquire as to when they would be leaving. FE staff were informed that due to concerns about a second traveller group in the area, the group at Ingrebourne Hill would be moving in the next couple of days.
6. As landowners, IVL instructed the FE to repossess the property by means of employing bailiffs to facilitate an eviction of the group. The

cost of £1975 was borne by the FE with an eviction due to take place later in the week.

7. On Tuesday 1st March the local FE team visited the site to find the last caravan leaving site, with the occupants again citing the proximity of another group in the area they had concerns about. The local team stayed on site to commence the clear up operation of household and human waste. IVL arranged for two lorry loads of top soil to be dropped across the point of entry, creating a physical bund, in the hope of preventing future unauthorized access.
8. Whilst this incident was resolved relatively quickly, historically the local FE team has had to deal with numerous encampments at Ingrebourne Hill, with substantial costs incurred relating to both waste removal, remedial work to secure the boundary and additional ongoing security measures.
9. For example, in 2015 over 35 caravans, shown at **[Exhibit SE/2]** set up on Ingrebourne Hill, with associated costs of approximately £2230 on waste removal and £20,000 on retrospective remedial work and site hardening to increase security across all local FE sites, including the placement of boulders around high risk areas and entrances, and raising the profile of ditching and bunds around the car parks themselves.
10. Through checking of records held there was also an incursion in 2014, after which waste removal after the encampment left costs of £1300.
11. No payment from any of the travellers towards those costs were received by FE.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed: 

Name: Simon Clark

Date: 26/7/2019

Claimant: LB of Havering
James Sutton
First
Exhibits: JS/1-JS/2
Date: 30.06.2017

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

AND

- (1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING OR INTENDING TO FORM ENCAMPMENTS IN THE LONDON BOROUGH OF HAVERING

Defendants

WITNESS STATEMENT OF JAMES SUTTON

I, James Sutton, currently employed as a Mineral and Waste Planner by Ingrebourne Valley Limited, Cecil House, Foster Street, Harlow, Essex, CM17 9HY, WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts in this witness statement come from my own knowledge or, where they are not from my own knowledge, they are true to the best of my knowledge and belief.
2. Ingrebourne Valley specialise in remediating historic damaged,

brownfield land /sites. Upon the successful completion of a restoration scheme these sites are revived as public open space and/or biodiversity conservation areas, often managed in the long term by managing agents such as the Forestry Commission or other environmental charities.

3. Back in 2010-11 Ingrebourne Valley restored the Ingrebourne Hill from a neglected, semi derelict state which had become a magnet for anti-social behaviour and indiscriminate fly tipping.
4. Once completed the site was handed over to the Forestry Commission for them to manage on a long term lease which reduced the level of illegal activities taking place as well as providing circa 45 hectares of community woodland and green open space to the residents of Hornchurch and the wider area to use for leisure and recreation. The scheme provided investment into the local community through the economic opportunities it originally provided as well as offering long term benefits through the creation of accessible green public open spaces which can support wider health and well-being initiatives and provide a focus for on-site community activity and volunteering opportunities.
5. Furthermore, the site provides important ecological habitats and designations including the Ingrebourne Valley Local Nature Reserve (LNR) which supports a range of habitats for birds, invertebrates and reptiles. However, and perhaps more importantly is the location of the Ingrebourne Marshes SSSI which lies in close proximity to the site and this supports a diverse biological interest , being a freshwater marshland with extensive reed growth.

6. The site has been notified since 6 March 1989 under the Wildlife and Countryside Act 1989. The reason for the notification as recorded by Natural England is that *“Ingrebourne Valley supports the largest and one of the most diverse coherent areas of freshwater marshland in Greater London. The variety of habitat includes extensive areas of reed sweet-grass and common reed, swamp, wet natural grassland and tall fen. Nowhere else in London do these habitats occur on such a large scale or in such intimate juxtaposition. These habitats also support a rich assemblage of associated invertebrates and breeding birds”*. Natural England also confirms in the designation that the area, which forms the largest reed bed left in London, also supports *“Golden Dock, a nationally scarce plant”*. The area also includes *“16 nationally scarce fly, beetle, dragonfly and cricket species”*. The designation is produced and shown to me as **JS/1**

7. Natural England also publishes a list of *“Operations requiring Natural England’s Consent”* which is produced and shown to me as exhibit **JS/2**. This lists operations which *“are likely to damage the special interest”*. Of particular note, in relation to unauthorised encampments, are; *“dumping, spreading or discharge of any materials; burning; the release into the site of any wild, feral, or domestic animal, construction, removal or destruction of road, tracks, walls, fences, hardstands...; storage of materials; use of vehicles...likely o damage or disturb features of interest; recreational or other activities likely to damage or disturb features of interest; erection of permanent or temporary structures”*.

8. The risk from trespassers and illegal encampment can be widespread in this part of East London, and the rubbish / waste that is left behind as a result has the potential to affect the high level of biodiversity within the site and surrounding areas which are often in direct connectivity. Ingrebourne Hill provides an essential link that enables residents to use Hornchurch Country Park as well and with a distinct lack of public green open space in the wider area it is clear that this site must be fully protected from any future unauthorised encampments.

9. Following the eviction of the travellers in 2014, a clean up operation was undertaken by Ingrebourne Valley Ltd as a responsible landowner and these operations cost the company a total of £32,131.97. The costs range from Personal Protective Equipment (PPE) to the costs associated with the removal of asbestos contamination and subsequent haulage removal costs. There was a second incursion in March 2016 but this was on Forestry Commission land and not directly dealt with by Ingrebourne Valley. However, we did arrange for bailiffs and for waste clearance on the site, and we were re-imbursed by the Forestry Commission for this.

10. No payments from any of the travellers towards those costs were received by Ingrebourne Valley Limited.

I believe that the facts stated in this witness statement are true.

Signed: 

Name: James Sutton

Date: 30th June 2017

Claimant
D Moore
First
Exhibits

Date: _____

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant
D Moore
First
Exhibits

and

(1) MR WILLIAM STOKES AND OTHER DEFENDANTS LISTED IN SCHEDULE 1 OF THE
CLAIM FORM

IN THE HIGH COURT OF JUSTICE:

QUEENS BENCH DIVISION

(2) PERSON UNKNOWN

Defendants

BETWEEN

WITNESS STATEMENT OF DEBBIE MOORE

Defendants
D Moore
First
Exhibits

I, Debbie Moore, BID Co-Ordinator with London Riverside (BID) Ltd, Estate House, Fairview Industrial Estate, Rainham, Rm13 8UH WILL SAY AS FOLLOWS:-

- Defendants
1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from my own direct knowledge unless stated otherwise. Those facts outside my own direct knowledge are true to the best of my knowledge and belief.
 2. I am responsible for the day to day operations and projects carried out within the BID area, which include informing all businesses of any security incidents, suspicious activity.
 3. The London Riverside (BID) Ltd is a business improvement district. A Business Improvement District (BID) is a geographical area in which the local businesses have voted to invest together to improve their environment. BIDs provide additional or improved services, identified by the local businesses. This could include extra safety, cleaning or environmental measures. BIDs are business-led organisations. They're funded by a mandatory levy on all eligible businesses after a successful ballot. The Mayor and City Hall strongly endorse the idea of BIDs and their role in the 'place shaping' of local town centres and industrial estates.
 4. During an unlawful encampment within the BID district, the normal course of events will be as follows. Myself or a colleague will be notified by the security contractor, including at evenings or weekends, who will inform of the location of any encampment. The Police will normally be contacted direct by the security contractor.

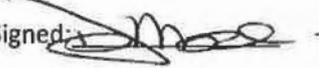
Claimant
D Moore
First
Exhibits

Date: _____

5. As soon as possible we will email the information to all interested parties on the database, namely, the Council, private landlords, Fords, Tesco and other local security companies. We may be informed that other incursions have occurred, and will circulate accordingly.
6. We are then very active in making sure that the landlords and occupiers are aware of the incursion and will provide assistance where necessary in helping private landlords to obtain the necessary paperwork in order that they can secure an eviction order through the Courts. Because of the severity of incursions in the area, I am told that some landlords keep bailiffs on speed dial.
7. If the incursion is within the BID area, we instruct our private security company (Security Projects UK Ltd) to provide 24 hour cover at the location in question. This assists in alleviating the worry for local business that area that area affected by the unauthorised encampment. The costs of this is covered by the BID which can be anywhere between 3 days or 3 weeks. The cost for this service is £13.50 per hour, £324.00 per day. This is money that could better be invested on improvements within the BID area.
8. We will update local interested parties as to any eviction date so that they can implement any necessary 'target hardening' to protect against further unauthorised encampments as a result of the encampment moving on.
9. I am aware that the travellers are regularly abusive towards guards, and there is a particular problem with racially aggravated intimidation. I recall once incident in which a guard has been bitten on the neck and physically removed from the yard he was patrolling. (I attach a copy of the security report sent to the BID from our security contractor— Security Projects (UK) Ltd)
10. Usually fly tipping will accumulate during the course of an unlawful encampment. Where possible we will assist landlords in attempting to remove the fly tip, as the ongoing presence of a fly tip can attract further unlawful deposits, worsening the situation.
11. I have, on two occasions, been called into work during my time off to respond to unlawful encampments. It can be very time consuming and delay other work.
12. The parties who I consider have been particularly affected are; Security Projects UK LTD, D&D commercials, Tops Prints, Technology Desking Ltd and Rainham Steel.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: 

Debbie Moore

Date: 16/4/2019

Claimant: LBH
Tajinder Dhir
First
Exhibits: TD1 - TD8
Date: 08.07.2019

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

WILLIAM STOKES AND OTHERS LISTED ON THE ATTACHED SCHEDULE
& PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF TAJINDER SINGH DHIR

I, Mr Tajinder Dhir, currently employed as the Senior Group Manager for Mastcraft Limited WILL SAY AS FOLLOWS:-

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. The facts stated in this witness statement come from my own knowledge and are true. Where those facts are not from my own knowledge they are true to the best of my knowledge and belief.

2. I produce and am shown **Exhibits TD1-TD2**, which are two collage of photographs showing damage and fly-tip arising from a traveller incursion onto our site.
3. Mastcraft Limited is a parent company. Palms Hospitality Limited is a subsidiary of Mastcraft Limited and owns Palms Hotel which is now called Austin Hotel. I have been managing Austin Hotel, formerly the Palms Hotel, which is situated in the Borough of Havering on the A127 Southend Arterial Road. I have managed the premises since it has not been functioning. The premises is being redeveloped into a hotel as part of a group of hotels and refurbished, and remains closed during this period.

Incident in October 2016

4. On the 4th October 2016 I was made aware of a traveller incursion onto the car park and lands forming part of the hotel.
5. I sent an email to insurers on 5th October 2016 in morning at 8.55 a.m. informing that on 4th October 2016 a group of travellers forcibly entered and ransacked the Palms Hotel, they are numbered around 60, with their vans and are still in the car park and that the Police has been called on the day. I was provided with reference CAD9540 & CAD9419, 4.10.2015, CRIME REF: CR/S4/166/78-16
6. Mr IP Singh, the then manager of the premises, reported that the travellers had forcibly gained entry into the hotel and in that process, two of the staff members had been injured. The staff were threatened and told that if they returned to the site, they would be killed, and as a result they fled the site. A number of calls were made to the Police but they did not assist, stating it was a civil matter. Mr Singh reports that he spoke with the duty sergeant at

02:30 a.m. re-iterating his frustration that there was no Police support given. He re-iterated the forced entry, threats and thefts.

7. Mr Singh reported that, after regaining entry, it was observed that the hotel had been ransacked, with doors kicked down and theft of the CCTV system. Locks, doors and windows were all damaged, and fridges, utensils and bedding had all been stolen as well. Additional security was called in and a bailiff team was employed to secure eviction.
8. Although the Police did eventually attend the hotel, they did not remove the travellers or prevent further fly tipping or further damage. The Police did not obtain any details of the perpetrators and it was left to us as landowners to secure evictions and to accept the financial loss as a result.
9. As soon as travellers had forced entry, various types of vehicles attended the site depositing a variety of waste material including tyres, construction materials and waste, domestic household furniture including white goods, asbestos containing material plus human and household waste. It is only when the travellers have left site that the full extent of the fly tipping of waste can be seen. Photographic evidence has been provided to show the type and amount of waste left after the encampment.
10. The site had been due to re-open in 2 months time, and a lot of work was required to fix the damage. We received the following quotes for work and replacements:
 - a. A quote form TTA Construction to repair door damage - £59,700 + VAT. I produce and am shown **Exhibit TD3**.

- b. A quote from Mitre for Replacement bedding - £10,426.50 + VAT. I produce and am shown **Exhibit TD4**.
- c. A quote for replacement gardening equipment - £159.99 for a landscaping tool and £449.99 for a petrol mower. I produce and am shown totalling £609.98 **Exhibit TD5**
- d. A quote from Scenery Fencing UK Ltd for installation of crash barrier and gates - £13,740 + VAT. I produce and am shown **Exhibit TD6**.
- e. A quote from Benning Construction Ltd for Damage re-instatement works - £42,530 + VAT. I produce and am shown **Exhibit TD7**
- f. I also produce and am shown **Exhibit TD8** a spreadsheet detailing urgent works, namely
 - i. Around the Clock Locks Ltd - £256.00 + VAT
 - ii. Enforcement Bailiffs Ltd - £4,150 + VAT
 - iii. Seales Road Haulage Ltd - £9,900 + VAT
 - iv. Safe Systems UK Ltd - £1,320 + VAT
 - v. G4S CCTV - £19,500 + VAT

11. Some of these quotes were multiple quotes. Once work was agreed, the total financial loss to the business following this incident is therefore £106,308 as detailed in the table which I produce and is shown as **Exhibit TD8**.

Incident in September 2018

12. I was informed about the incident on 01 September 2018 where I noted that windows had been smashed by travellers at hotel. We had to employ extra security as there were only two security usually stationed at the premises. We secured the premises with fencing and other 'target hardening'. The CCTV system had again been ransacked.

13. The cost to the Mastcraft Hotels Group to evict travellers and clean up the dumped waste is substantial. The estimated cost to remove fly tipped material left by the travellers on the hotel site is £5,000. The Mastcraft Hotels group has also expended over £15,000 in additional physical security measures to minimise further illegal incursions. A further £2,500 of costs have been incurred for legal fees and bailiff costs.
14. The land is now being protected by the installation of bunds, trenches, concrete blocks, palisade fencing and concrete bollards with a number of sites still with substantial amounts of waste material remaining on them which will be removed once the procurement process has been completed later this year.
15. As a result of the impact of the unlawful encampments, the redevelopment of the site will be delayed or possibly scrapped owing to the additional financial pressures caused by this unauthorised traveller encampment. A significant amount of time and money has been wasted as a result of these matters.
16. The effect of the encampments can be summarised as follows:
 - a. Reduced land values resulting from the perception of the area being less attractive to prospective house buyers.
 - b. If Mastcraft Hotels Group decline to continue developing the site, it will remain vulnerable to further unauthorised encampments, and any other company interested in developing on this site would not offer the best price for the land.

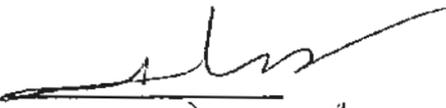
- c. Additional clean up cost to the developer if the land is contaminated resulting from fly tipping of hazardous material such as asbestos.

17. In addition, the result of the illegal access and dumping of waste material has a detrimental effect on local residents and businesses. We would be strongly supportive of an injunction with attached power of arrest, as the Police will have the power to immediately advise the unlawful occupiers to leave without the land owner having to secure an eviction through the court. If the travellers still refuse to leave the police will have the power to arrest and remove the unlawful occupants.

18. Urgent action is required to deal with these situations which will only become worse if offenders realise that the Borough and Police are powerless in implementing evictions without a court order therefore I fully support this application for an injunction.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed: 
Name: Tajinder S Dhillon
Date: 25 July 2019

Claimant
M White
First
Exhibits
Date

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

WILLIAM STOKES AND OTHERS LISTED ON THE ATTACHED SCHEDULE
PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF MARK WHITE

I, Mark White, director of Security Projects UK Limited, 3a Fairview Industrial Estate, Blackwater Close, Rainham, RM13 8UA WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from within my own knowledge unless stated otherwise. Where facts are not within my own direct knowledge they are true to the best of my knowledge and belief.
2. On 25 April 2019 I was contacted by Barry Amerige enforcement officer with the London Borough of Havering, regarding travellers incursions on a site at Consul Avenue, Rainham, which occurred in 2016.
3. On 1 August 2016 at 23:30 Mr Kane White, who was engaged on duty as a mobile patrol unit, was contacted by telephone by Abdul Kareem, who is a security officer employed by Security Projects UK and who was on duty at the

Claimant
M White
First
Exhibits
Date

gatehouse in Consul Avenue. This was a location which Security Projects UK had been contracted to guard.

4. Abdul Kareem informed Mr White that there were approximately 10 to 15 travellers in the process of cutting the padlock off the main gate with an angle grinder. Mr White reported this to the Metropolitan Police and it was recorded under reference CAD 1009201082916. Mr Kane then arrived at Consul avenue at 23.29 hrs.
5. At 23.30 It was noted that 7 or 8 caravans and transit vans had already gained access and the travellers had placed their own padlock on the gate. Mr White was then informed that one of the travellers had sought to remove Mr Kareem from the gatehouse and, in the process of doing this, had bitten him on the neck.
6. Police arrived at 23.30. The travellers refused to leave the site despite Police requests. No arrests were made as the perpetrator could not be identified. Mr White informed the landowners as to the events, and I made my way to the site. Police left at 01.19 having been unable to assist.
7. I produce and am shown Exhibit **MW/1** and email detailing the events.

STATEMENT OF TRUTH

Signed: _____

Mark White

Date: _____

16th July 19.

Claimant
G Bramley
First
Exhibits:
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

WILLIAM STOKES AND OTHERS LISTED ON THE ATTACHED SCHEDULE
PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF GEORGE BRAMLEY

I, George Bramley, owner of D&D Commercial Services Limited, Unit 3, Lamson Road, Rainham, RM13 9YY, WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from within my own knowledge unless stated otherwise. Where facts are not within my own direct knowledge they are true to the best of my knowledge and belief.
2. On 18 April 2019 I was contact by Barry Amerige, and enforcement officer with the London Borough of Havering. This was with regard to an unlawful encampment at a site within Lamson Road, Rainhan, during 2018.
3. I cannot recall the precise date, however I remember the encampment clearly and it occurred at land adjacent to my business premises, at Unit 1, which is occupied by Kerry Foods. I noticed that the perimeter fencing had been damaged which gave access to the various vehicles. The site housed a number of

Claimant
G Bramley
First
Exhibits:
Date:

vehicles and over the course of the encampment, the number of vehicles decreased as the space occupied began to fill up with waste.

4. The noise from the encampment caused considerable business disruption, namely the noise of mechanically fuelled electrical generators which were audible from my premises. There was the additional noise from raised voices, shouting, laughter and loud amplified music.
5. As a result of the encampment, the land was fly tipped heavily by the persons occupying the encampment. The fly tip consisted of commercial waste, tipped bricks, wood, dirt and their own rubbish. There has historically been an issue with rodents and foxes in this area, and I was concerned that the waste generated could exacerbate this problem. The fly tipping impacted on the environment and visual amenity of the area.
6. I was fearful of crime as a result, specifically fear of physical harm if I challenged any member of the encampment, and also the possibility of goods and items being removed from outside of the properties and potential burglary. I therefore had to arrange additional security to guard the gates and prevent entry and further theft and damage.
7. My business suffered a substantial financial loss of £10,000 as a result of theft and damages at the time of the incursion. Our roller shutters were cut open and tyres were stolen. At the time of the incursion, I recognised persons encamped within the area touting goods which I recognised as mine which I reported to the Police. Our truck tyres have a badge on them with the company name. A tyre company in Ferry Lane was offered our tyres and they called to let us know.

STATEMENT OF TRUTH

Claimant
G Bramley
First
Exhibits:
Date:

Signed: Bramley Date: 24 July 2019
George Bramley

IN THE HIGH COURT OF JUSTICE

Claim Number: _____

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

And

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF DEREK MOUNTNEY

1. My name is Derek Mountney and I am the owner of the Door Factory located at Unit 1 International Industrial Park, Rainham RM13 8RH.
2. I act as witness in these proceedings as a result of complaints received by the claimant and his legal representative.
3. The facts in this witness statement come from my own knowledge or where they are not from my own knowledge are true to the best of my knowledge or belief.

Statement of Truth

4. On the 3rd April 2018 I was contacted by Barry Amerige , an Enforcement Officer within the London Borough of Havering.
5. This was regarding a traveller incursion upon a site within land bordering Unit 1 of International Industrial Park, Rainham RM13 8RH.

6. He informed me that the London Borough of Havering were in the process of making an application for an injunctive order regarding Traveller incursions and asked if I wished to provide information supportive of any action the Local Authority wished to take as a result of such an incursion.
7. The land was heavily fly tipped by persons encamped or visitors to the encampment.
8. Photographs representative of the fly tip were taken on Tuesday 3rd April 2018. I present this collage as my Exhibit DM01.
9. The incursion at Land adjacent to Unit 1 International Industrial Park, Rainham RM13 8RH was first noted sometime the previous week.
10. The land occupied is used as car parking area for my business. The occupation of the land forced my staff and I to park away from the business giving anxiety of fear of damage to vehicles and our safety walking to and from the parked vehicles as a result of them being parked elsewhere.
11. There site housed multiple caravans and vehicles and over the course of the incursion, the vehicle and caravan numbers decreased as the space occupied began to fill up with waste.
12. The noise from the incursion was also disturbing and disrupting the business which took the form of a mechanical fuelled electrical generator which was clearly audible over the A13 traffic.
13. Noise was also audible from dogs kept on the incursion site.
14. I saw dogs coming from the site onto New Rd via a hole in the fencing and attacking pedestrians and threatening barking.
15. There is an historic rodent and urban Fox problem in the immediate area. The concerns of waste generation and illegal commercial waste disposal often associated with travellers feared would exacerbate this problem.

16. I was concerned over environmental impact of such incursions and the impact of the visual amenity of the area by the presence of the same.

17. I was fearful for safety of my business as a result of this encampment and a fear of physical harm if challenged.

18. The clean-up cost to my business as a result of this incursion was over £80,000.00.

19. On Monday 15th April 2019 Barry Amerige again contacted me asking if I was prepared to make a statement regarding the incursion @ Unit 1 International Industrial Park, Rainham RM13 8RH from April 2018.

20. I believe that the facts stated in this witness statement are true.

Signed: _____



Name: DEREK MOUNTNEY.

Date: Tuesday, 16 April 2019

Claimant
S Harland
First
Exhibits
Date

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

WILLIAM STOKES AND OTHERS LISTED ON THE ATTACHED SCHEDULE
PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF SUSAN HARLAND

I, Susan Harland, employee of Estuary Housing Association as a Tenancies Housing manager at Centre Place, Prospect Close, Southend on Sea, Essex, SS1 2JY WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from within my own knowledge unless stated otherwise. Where facts are not within my own direct knowledge they are true to the best of my knowledge and belief.
2. On 12 April 2019 I was contact by Barry Amerige, and enforcement officer with the London Borough of Havering. This was with regard to an unlawful encampment at a site at Neopost, South Street, Romford, RM1 2AR during 2018. The unlawful encampment took place on 28 May 2018 on land owned by Estuary Housing Association. The travellers gained entry to the land by breaking locks and forcing entry into the site.

Claimant
S Harland
First
Exhibits
Date

3. Initially the travellers move in with 6 caravans onto the land, and a truck full of rubbish was witnessed coming onto the site. We received a number of calls from concerned residents reporting that residents of a nearby development at Vickers House that persons on site were throwing bricks at the windows and that abuse language and behaviour was being directed toward the residents. I reported this to the Police and the Council.

4. Estuary Housing therefore engaged the services of a High Court Enforcement Agency to serve notice of eviction on our behalf. The site was secured on 30 May 2018 and security guards monitored the site until it could be fully secured the next day. The costs of the High Court Enforcement Agency was £594 for service of the notice, and £900 to arrange for removal of the encampment. Additional security barriers had to be installed after the site had been cleared.

5. A considerable amount of waste had been left at the site, preventing access by tenants to the refuse store, to properly dispose of their own waste.

6. I produce and am shown Exhibit SH/1 photographs of the encampment at the time.

STATEMENT OF TRUTH

Signed: S Harland Date: 19/7/19
Susan Harland

Claimant
R Honey
First
Exhibits
Date

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

WILLIAM STOKES AND OTHERS LISTED ON THE ATTACHED SCHEDULE

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF ROGER HONEY

I, Roger Honey, Treasurer of the Ardgleigh Green and Havering Atte Bower Cricket Club ('the club'), Broxhill Road, RM4 WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from within my own knowledge unless stated otherwise. Where facts are not within my own direct knowledge they are true to the best of my knowledge and belief.
2. The club is located within the London Borough of Havering, and the last incursion took place on 19 June 2017. During this incursion a group of travellers encamped within the boundary of the club. Rubbish was left at the site from the travellers encampment, and waste overflowed into the adjacent field. The water hose pipe went missing during this time.
3. As a security measure we have now put the pitch entrance gate out of use with a large boulder in front of it.

Claimant
R Honey
First
Exhibits
Date

4. Because of the encampment, arrangements had to be made to cancel one Saturday match at a costs of £75.00. The travellers were subsequently eviction at a costs of £3,720.00. This was a significant cost for the club as we were only in a position to pay it after donations from club members and members of the public.

STATEMENT OF TRUTH

Signed: R. Honey Date: 4/8/19
Roger Honey

Claimant
R Napp
First
Exhibits
Date

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

and

WILLIAM STOKES AND OTHERS LISTED ON THE ATTACHED SCHEDULE
PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF RUTH NAPP

I, Ruth Napp, Business Development Director for Simply Loos Environmental Services, Manor Way, Rainham, RM13 8RH WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for interim and final injunctions against the above named defendants. The facts contained in this witness statement are from within my own knowledge unless stated otherwise. Where facts are not within my own direct knowledge they are true to the best of my knowledge and belief.
2. On 3 April 2018 I was contacted by Barry Amerige enforcement officer with the London Borough of Havering, regarding travellers incursions at Unit 1, International Industrial Park, Rainham, RM13 8RH.
3. I do not recall the precise date, but do recall that the incursion was heavily fly tipped, having first occurred a week prior. The site housed multiple caravans and vehicles over the course of the encampment, which decreased as the site became full with waste. During the course of the encampment, damage was

Claimant
R Napp
First
Exhibits
Date

caused to our gating sensors and the intercom. The intercom was also repeatedly abused by the travellers' children which caused it to break. This caused considerable business disruption.

4. Our business provides emergency services for companies such as Thames Water, and both entry and egress from the business was compromised as a result of the incursion. At times, vehicles from the encampment totally blocked the gates. Some of our vehicles were damaged as a result of not being able to use the compound.
5. Additional security had to be arranged to guard the gates and prevent entry and further damage by the travellers. I was concerned over safety as a result of the encampment, and also concerned about the environmental and amenity impact caused by the fly tipping.

STATEMENT OF TRUTH

Signed:  Date: 16/7/19
Ruth Napp