

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

Claim Number:



**IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990
AND S1 ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014**

Before Mr Justice Phillips

On the 31st day of July 2019

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

-and-

**(1) WILLIAMS STOKES & 104 OTHER NAMED DEFENDANTS NAMED IN
SCHEDULE 1**

**(106) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE LONDON BOROUGH OF HAVERING**

Defendants

ORDER

UPON HEARING Counsel for the Claimant without notice to the Defendants

AND UPON the Claimants undertaking to issue the Part 8 Claim form for an injunction and application notice for an interim injunction in the form attached with this without notice application for alternative service

AND UPON reading the witness statement of Mandeep Mehat

IT IS ORDERED THAT:

1. The interim injunction application shall be listed before a Judge on 10 September 2019 at 10.30am to allow three clear days between service of the proceedings and the hearing date for the application for an interim injunction. There shall be a 2 hour time estimate.
2. Pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 the Claimant has permission to serve the named Defendants between 6.30 am and 8 pm during the week and 7am and 4pm on a Saturday. Copies (as opposed to originals) of the Claim Form and Applications served on a Saturday will be deemed served on the second working day after the date of service and copies (as opposed to originals) of claim forms and applications served after 4.p.m. on a working day shall be deemed served on the second working day after the date of service.
3. In the event that the Claimant is unable to personally serve the 1st to 105th Defendants, pursuant to CPR 6.14 and 6.15 the Claimant shall be permitted to serve any such Defendants by leaving a copy (as opposed to an original) of the application notice, claim form, draft order and supporting evidence in a clear transparent envelope and affixing the same to a caravan, mobile home or other vehicle, or to the front door of any residential premises which in each case is reasonable believed to be owned or occupied by the said Defendants, or by putting such copy documents through the letter box of any such residential premises. Any such copy documents served by this method will be deemed served the second working day after service of the application notice and claim form.
4. The Claimant shall be permitted pursuant to CPR 6.27 to serve the evidence in support of the Claim and application for an interim injunction by USB memory stick and/or by providing a digital link to the evidence contained on the Claimants website and shall provide any Defendant that requests copies of the same within 2 working days of receipt of such request, and shall have a copy of all evidence relied upon in these proceedings available for inspection at the Havering Town Hall Main Road,

Romford RM1 3BB, between the hours of 10am and 4pm Monday to Friday, excluding public holidays.

5. The claim form and application shall be deemed served on persons unknown (106th Defendant) pursuant to CPR 6.14, 6.15, 6.26 and 6.27 by serving a copy (as opposed to an original) of the claim form, application notice and draft order on all sites identified in Schedule 2 and 3 of this order by affixing them in a prominent place on the Land with a notice to persons unknown that a copy of the supporting evidence can be obtained from the Council offices at Havering Town Hall Main Road, Romford RM1 3BB between the hours of 10am and 4pm Monday to Friday, excluding public holidays, and by providing a digital link to a copy of the evidence on the Claimant's website.
6. The Defendants shall acknowledge service of the claim form 21 days after the date of deemed service and file any written evidence in support of the Defence by the same date.
7. The Claimant has permission to serve the Defendants with a sealed copy of this order (as opposed to an original).

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

SCHEDULE 1 – LIST OF DEFENDANTS

- 2) Craig Reece
- 3) Mohammed Nadeer
- 4) Brian Stokes
- 5) Michael Doherty
- 6) Mr J Cassidy
- 7) John Smith
- 8) Jonathan Ashton
- 9) James Robert Manning
- 10) Gary Ward
- 11) Abigail Eldridge
- 12) Patrick Doran
- 13) Marshall Tattam
- 14) Marshall William Tattam
- 15) James Allen
- 16) Patrick Stokes
- 17) Patrick Stokes (2)
- 18) Martin McDonagh
- 19) Mathew McGrory
- 20) Thomas Stokes
- 21) Tom Seokes
- 22) Russell Francis Stanley
- 23) Roberto Silva
- 24) Charley Delaney
- 25) Patrick Anthony McDonagh
- 26) Patrick McDonagh

- 27) Michael Lawrence
- 28) Edward McDonagh
- 29) Thurston Bros
- 30) John Walter Thurston
- 31) Lawrence Connors
- 32) William Stokes (2)
- 33) Gerry Connors
- 34) Guy Lidbetter
- 35) Lorna Upton
- 36) Andrew Gray
- 37) Joan Conner
- 38) Mark Fitzgerald
- 39) Anthony James
- 40) Celine Power
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- 54) Eddie Lawrence
- 55) Alexis Maughan
- 56) Ellen Stokes
- 57) Stephen Stokes
- 58) Michael McDonagh
- 59) Maurice Taggart
- 60) Dean Montgomery
- 61) Jason Barton
- 62) Christopher Lawrence
- 63) Brian Alan Clark
- 64) Ben Warbles
- 65) Winnie Maughan
- 66) Kevin Maughan
- 67) Ann Nevin
- 68) Jaye Price
- 69) Hope Price
- 70) Harry Mochan
- 71) Thomas Machan
- 72) Rosemary Arrowsmith
- 73) Bobby McDonald
- 74) Joseph Stewart

- 75) Elizabeth Stewart
- 76) Leanne Baggott
- 77) Tom Pyman
- 78) Joseph Jones
- 79) William Williams
- 80) Christine Williams
- 81) Joseph Williams
- 82) Charlene Jones
- 83) Tony Jones
- 84) Martin Bryant
- 85) Sharon Fraser
- 86) Westlay Williams
- 87) Luke Clee
- 88) Jordon Lee
- 89) John Lee
- 90) Samuel Evans
- 91) James Evans
- 92) Manrica Lee
- 93) Jim Obrien
- 94) Martin Hallissey
- 95) Tina O'Neill
- 96) Jake Lee
- 97) Anthony Price
- 98) Catherine McCann
- 99) Priscilla Garside
- 100) James Doran
- 101) Falex Doran
- 102) Marton Doran
- 103) Nickola Tomlinson
- 104) Ann Connors
- 105) Patrick Connors

IN THE HIGH COURT OF JUSTICE

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AND

(106) PERSONS UNKNOWN

DEFENDANTS

SCHEDULE 2 – MAP

**IN THE HIGH COURT OF JUSTICE
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BETWEEN**

LONDON BOROUGH OF HAVERING

CLAIMANT

AND

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AND

(106) PERSONS UNKNOWN

DEFENDANTS

SCHEDULE 3 – LIST OF SITES

Schools

ID	Address	Ownership
1	Abbs Cross Academy and Arts College, Abbs Cross Lane, Hornchurch, RM12 4YB	Public
2	Ardleigh Green Infant School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
3	Ardleigh Green Junior School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
4	Benhurst Primary School, Benhurst Avenue, Hornchurch, RM12 4QS	Public
5	Bower Park Academy, Havering Road, Romford, RM1 4YY	Public
6	Brady Primary School, Wennington Road, Rainham, RM13 9XA	Public
7	Branfil Primary School, Cedar Avenue, Upminster, RM14 2LW	Public
8	Broadford Primary School, Faringdon Avenue, Romford, RM3 8JS	Public
9	Clockhouse Primary School, Clockhouse Lane, Romford, RM5 3QR	Public
10	Corbets Tey School, Harwood Hall Lane, Upminster, RM14 2YQ	Public
11	Crowlands Primary School, London Road, Romford, RM7 9NS	Public
12	Crownfield Infant School, White Hart Lane, Romford, RM7 8JB	Public
13	Crownfield Junior School, White Hart Lane, Romford, RM7 8JB	Public
14	Dame Tipping Church of England Primary School, North Road, Havering-Atte-Bower, Romford, RM4 1PS	Public
15	Drapers' Academy, Settle Road, Romford, RM3 9XR	Public
16	Drapers' Brookside Infant School, Dagnam Park Drive, Romford, RM3 9DJ	Public
17	Drapers' Brookside Junior School, Dagnam Park Drive, Romford, RM3 9DJ	Public
18	Drapers' Maylands Primary School, Settle Road, Romford, RM3 9XR	Public
19	Drapers Pyrgo Priory Primary School, Settle Road, Romford, RM3 9RT	Public
20	Dycorts School, Settle Road, Romford, RM3 9YA	Public
21	Elm Park Primary School, South End Road, Hornchurch, RM12 5UA	Public
22	Emerson Park Academy, Wych Elm Road, Hornchurch, RM11 3AD	Public
23	Engayne Primary School, Severn Drive, Upminster, RM14 1SW	Public
24	Gaynes School, Brackendale Gardens, Upminster, RM14 3UX	Public
25	Gidea Park College, Balgores Lane, Romford, RM2 5JR	Public
26	Gidea Park Primary School, Lodge Avenue, Romford, RM2 5AJ	Public
27	Goodrington School, Walden Road, Hornchurch, RM11 2JT	Public
28	Hacton Primary School, Chepstow Avenue, Hornchurch, RM12 6AU	Public
29	Hall Mead School, Marlborough Gardens, Upminster, RM14 1SF	Public
30	Harold Court Primary School, Church Road, Romford, RM3 0SH	Public
31	Harold Wood Primary School, Recreation Avenue, Romford, RM3 0TH	Public
32	Harrow Lodge Primary School, Rainsford Way, Hornchurch, RM12 4BP	Public
33	Hilldene Primary School, Straight Road, Romford, RM3 7DT	Public
34	Hylands Primary School, Granger Way, Romford, RM1 2RU	Public
35	Immanuel School, Havering Road, Romford, RM1 4HR	Public
36	La Salette Catholic Primary School, Rainham Road, Rainham, RM13 8SR	Public
37	Langtons Infant School, Westland Avenue, Hornchurch, RM11 3SD	Public
38	Langtons Junior Academy, Westland Avenue, Hornchurch, RM11 3SD	Public
39	Marshalls Park Academy, Pettits Lane, Romford, RM1 4EH	Public
40	Mead Primary School, Amersham Road, Romford, RM3 9JD	Public
41	Nelmes Primary School, Wingletye Lane, RM11 3BX	Public
42	Newtons Primary School, Lowen Road, Rainham, RM13 8QR	Public
43	Oakfields Montessori School, Harwood Hall Lane, Upminster, RM14 2YG	Public
44	Oasis Academy: Pinewood, Thistledene Avenue, Romford, RM5 2TX	Public
45	Parklands Infant School, Havering Road, Romford, RM1 4QX	Public
46	Parklands Junior School, Havering Road, Romford, RM1 4QX	Public
47	Parsonage Farm Primary School, Farm Road, Rainham, RM13 9JU	Public
48	R J Mitchell Primary School, Tangmere Crescent, Hornchurch, RM12 5PP	Public
49	Raphael Independent School, Park Lane, Hornchurch, RM11 1XY	Public
50	Ravensbourne School, Neave Crescent, Romford, RM3 8HN	Public
51	Redden Court School, Cotswold Road, Romford, RM3 0TS	Public
52	Rise Park Infant School, Annan Way, Romford, RM1 4UD	Public
53	Rise Park Junior School, Annan Way, Romford, RM1 4UD	Public
54	Sacred Heart of Mary Girls' School, St Marys Lane, Upminster, RM14 2QR	Public
55	Sanders School, Suttons Lane, Hornchurch, RM12 6RT	Public
56	Scargill Infant School, Mungo Park Road, Rainham, RM13 7PL	Public
57	Scargill Junior School, Mungo Park Road, Rainham, RM13 7PL	Public
58	Scotts Primary School, Bonington Road, Hornchurch, RM12 5TD	Public

59	Squirrels Heath Infant School, Salisbury Road, Romford, RM2 5TP	Public
60	Squirrels Heath Junior School, Salisbury Road, Romford, RM2 5TP	Public
61	St Alban's Catholic Primary School, Heron Flight Avenue, Hornchurch, RM12 5LN	Public
62	St Edward's Church of England School and Sixth Form College, London Road, Romford, RM7 9NX	Public
63	St Edward's Church of England Voluntary Aided Primary School, Havering Drive, Romford, RM1 4BT	Public
64	St Joseph's Catholic Primary School, St Mary's Lane, Upminster, RM14 2QB	Public
65	St Mary's Catholic Primary School, Hornchurch Road, Hornchurch, RM12 4TL	Public
66	St Mary's Hare Park Primary School, South Drive, Romford, RM2 6HH	Public
67	St Patrick's Catholic Primary School, Lowshoe Lane, Romford, RM5 2AP	Public
68	St Peter's Catholic Primary School, Dorset Avenue, Romford, RM1 4JA	Public
69	St Ursula's Catholic Infant School, Straight Road, Romford, RM3 7JS	Public
70	St Ursula's Catholic Junior School, Straight Road, Romford, RM3 7JS	Public
71	Suttons Primary School, Suttons Lane, Hornchurch, RM12 6RP	Public
72	The Albany School, Broadstone Road, Hornchurch, RM12 4AJ	Public
73	The Brittons Academy, Ford Lane, Rainham, RM13 7BB	Public
74	The Champion School, Wingletye Lane, Hornchurch, RM11 3BX	Public
75	The Coopers' Company and Coborn School, St Marys Lane, Upminster, RM14 3HS	Public
76	The Frances Bardsley Academy for Girls, Brentwood Road, Romford, RM1 2RR	Public
77	The Harris Academy (formerly Chafford School), Lambs Lane South, Rainham, RM13 9XD	Public
78	The James Oglethorpe Primary School, Ashvale Gardens, Upminster, RM14 3NB	Public
79	The Mawney Foundation School, Mawney Road, Romford, RM7 7HR	Public
80	The Royal Liberty School, Upper Brentwood Road, Romford, RM2 6HJ	Public
81	Towers Infant School, Osborne Road, Hornchurch, RM11 1HP	Public
82	Towers Junior School, Osborne Road, Hornchurch, RM11 1HP	Public
83	Upminster Infant School, St Marys Lane, Upminster, RM14 3BS	Public
84	Upminster Junior School, St Marys Lane, Upminster, RM14 3BS	Public
85	Whybridge Infant School, Ford Lane, Rainham, RM13 7AR	Public
86	Whybridge Junior School, Ford Lane, Rainham, RM13 7AR	Public
87	Rainham Village Primary School & Nursery, Upminster Road South, Rainham RM13 9AA	Public
88	Havering Technical College (Quarles Campus), Tring Gardens, Romford, RM3 9ES	Public
89	Havering College Rainham Campus, New Road, Rainham, RM13 8GP	Public
90	Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3SU	Public
91	Havering College of Further and Higher Education, Ardleigh Green Road, Hornchurch, RM11 2LL	Public

Council Owned Car Parks

ID	Address	Ownership
92	Appleton Way Car Park, Hornchurch	Public
93	Angel Way Multi Storey Car Park, Romford	Public
94	Balgores Square Car Park, Romford	Public
95	Billet Lane Car Park, Hornchurch	Public
96	Cherry Tree Car Park, Rainham	Public
97	Como Street Car Park, Romford	Public
98	Dorrington Gardens Car Park, Hornchurch	Public
99	Elm Park Hotel Car Park, Elm Park	Public
100	Elm Park Library Car Park, Elm Park	Public
101	Fentiman Way Car Park, Hornchurch	Public
102	Front Lane Car Park, Upminster	Public
103	Hoppy Hall Car Park, Upminster	Public
104	Keswick Avenue Car Park, Hornchurch	Public
105	Old Church Rise Car Park, Romford	Public
106	Rex Close Car Park, Romford	Public
107	Slaney Road Car Park, Romford	Public
108	Town Hall 3/4, Romford	Public
109	Town Hall 1/2, Romford	Public
110	Viking Way Car Park, Rainham	Public
111	Wilson Close Car Park, Upminster	Public
112	Woodhall Crescent Car Park, Hornchurch	Public

ID	Address	Ownership
113	Abbey Lane Open Space	
114	Amersham Road	
115	Balgores Lane playing field	
116	Barham Close	
117	Bedfords Park	
118	Berwick Woods	
119	Bretons Outdoor Recreation Ground	
120	Briar Road	
121	Brittons Playing Field	
122	Brookway play area	
123	Broxhill Centre	
124	Central Park	
125	Chelmsford Avenue Playsite	
126	Chelmsford Avenue/ Galleywood Crescent	
127	Chudleigh Road open Space	
128	Clematis Close	
129	Clockhouse Gardens	
130	Collier Row link	
131	Collier Row Recreation Ground Pedestrian gate	
132	Cornflower Way open Space	
133	Coronation Gardens	
134	Cottons Park	
135	Cranham Brickfields Sunnycroft Gdns	
136	Dagnam Park	
137	Elliots Field	
138	Elm Close / Elm Road	
139	Farringdon Flood Lagoon	
140	Fielders Sports Ground	
141	Fleet Close play site	
142	Forest Row Centre	
143	Forest Row play site	
144	Gaynes Parkway	
145	Gidea Park Sports Ground	
146	Gooshay Drive/Gooshay Gardens	
147	Gooshay Drive next to A12/ Melksham Drive	
148	Gooshay Drive/St Neots Road and Harlesden Road	
149	Grenfell Park	
150	Hacton Parkway and Playsite	
151	Hall Lane Mini Golf	
152	Harold Wood Park	
153	Harrow Lodge Park	
154	Havering Country Park	
155	Havering Playing Field	
156	Havering Road opposite Moray Way	
157	Havering Village Green	
158	Havering Well Garden	
159	Haynes Park	
160	Hilldene Ave/Nth Hill Drive	
161	o/s 25 Nth Hill Drive	
162	o/s 45 Nth Hill Drive	
163	Nth Hill Drive/ Taunton Road	
164	Taunton Rd/Barnstable Rd	
165	180 Taunton Rd	
166	Taunton Rd/Noak Hill Rd	
167	Ashbourne Rd/Lewes Rd	
168	Ashbourne Road/ Aylsham Lane	
169	Ashbourne Road	
170	Hornchurch Stadium	
171	Hylands Park	
172	Jutsums Recreation Ground	
173	Keats Avenue playsite	
174	Kew Close	
175	King Georges Playing Field	
176	Langtons Gardens	
177	Lamson Road, Rainham Marshes Nature Reserve	

178	Lawns Park	
179	Lessa Playsite and Open Space	
180	Lodge Farm Park	
181	Louis Marchesi Playsite (Maybank)	
182	Mardyke Adventure Playground and Open Space	
183	Mrtyle Road	
184	Noak Hill Sports Ground	
185	North Hill Recreation Ground	
186	Nth Romford Community Centre	
187	Oldchurch Park	
188	Painsbrook Open Space Harold Wood	
189	Painsbrook Way Open Space Harold Hill	
190	Park Lane Recreation Ground	
191	Parklands	
192	Priory Road Open Space	
193	Priory Road opposite Priory Path	
194	Priory Path	
195	Queens Theatre	
196	Rainham Recreation Ground	
197	Raphael Park	
198	Rise Park	
199	Rise Park Boulevard	
200	Sheffield Drive open space	
201	Spring Farm Park	
202	Stratton Wood	
203	St Andrews Park	
204	St Neots - Barnsley Road	
205	Sunflower Way flood lagoon	
206	Open Space Jarvis Way	
207	St Neots Open Area adj to Penzance Road	
208	St Neots play site	
209	Suttons Parkway	
210	The Dell, Hornchurch	
211	The Glens Elm Park	
212	The Glens, Rainham	
213	Tyle Green	
214	Tylers Common	
215	Upminster Hall Playing Field	
216	Upminster Park	
217	Westlands	
218	Whitchurch Road	
219	White Hart Lane/Cross Road	
220	Whybridge Close open space	
221	Wincanton Road open space/ Tees Drive	
222	Windmill Field	
223	Kings Lynn Drive/ Dartfields	
224	Dunstable Road	
225	o/s No. 132 Chatteris Ave	
226	Trowbridge Road	
227	Kingsbridge Circus	
228	Dewsbury Road/Farringdon Ave	
229	Halesworth Road/ Kettering Road	
230	Cambourne Ave opp. Halesworth Road	
231	Petersfield Ave/ Dagnam Park Drive	
232	Dagnam Park Drive / Sheffield Drive	
233	Dagnam Park Drive/Dagnam Park Square	
234	Dagnam Park Drive/ Dagnam Park Close	
235	Wingletye Lane between Upminster Road & Maywin Drive	
236	Between Hacton Lane & Kenley Gardens	
237	Between Hacton Lane & Clements Way	
238	Between Hacton Lane & Bevin Way	
239	Lilliput open space	
240	Jubilee Park , Old Church Road	
241	Queens Hospital vacant land site	
242	Hornchurch Country Park, Squadron Approach	
243	Ingrebourne Hill, Rainham Road	FORESTRY

244	Orange Tree Hill fields	
245	Rainham Creekside Path	
246	Stirling Close Open Space Rainham	
247	Rush Green Gardens Open Space	
248	Rainham Road opposite Thorogood Way	
249	Chadwick Drive open space, Harold Wood,	
250	Havering-atte-Bower Cricket Ground	
251	The Green, Wennington	
252	Duck Wood	
253	Tylers Wood	FORESTRY
254	Shoulder of Mutton Wood	
255	Hatters Wood	
256	Sage wood	
257	upminster cemetery	
258	rainham marshes	
259	Ingrebourne Valley North of A1306	
260	Whitchurch Road opp 118 - 158	
261	Federation Jewish Cemetery	
262	A12/Whitelands Way Bund, Whitelands Way, Romford	
263	Edenhall Road opp 24 & 28 Edenhall Road	
264	Kingsbridge Close	
265	Craven Gardens land adjacent to Lodge Lane	
266	Fairford Way / Petersfield Avenue	
267	Briscoe Road Verge, Kenway,	
268	Romford Library Gardens	
269	Crow Lane Cemetery	
270	St. Francis Hospice - Havering-Atte-Bower	
271	Harold Court Woods	FORESTRY
272	Pages Wood	FORESTRY
273	Berwick Glades	FORESTRY
274	Bonnetts Wood	FORESTRY
275	Thames Chase Forest Centre	FORESTRY
276	Folkes Lane Woodland	FORESTRY
277	Belhus Country Park	
278	Ockendon Road Grass Verge - adj Huntsman and Hounds	
279	Tem Gardens	



Claim Form (CPR Part 8)

In the High Court of Justice

Claim no.

Fee Account no. PBA0079788

Help with Fees -
Ref no. (if applicable) **H W F**

Claimant

The London Borough Havering
Enforcement Team
Newham Dockside,
1000 Dockside Road
London]
E16 2QU



QB-2019-002737

Defendant(s)

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

Does your claim include any issues under the Human Rights Act 1998? Yes No

Details of claim *(see also overleaf)*

1. The Claimant seeks an Interim and final injunction pursuant to s222 of the Local Government Act 1972, and/or s187B of the Town and Country Planning Act 1990, and/or s.1 of the Anti-Social Behaviour, Crime and Policing Act 2014, with a power of arrest attached to the appropriate provisions of the Court order.
2. The Claimant owns a number of public open spaces, car parks and other sites within its Borough and has suffered a number of unauthorised encampments throughout its Borough within the last 3 years as detailed in the witness statement evidence. In addition, a number of privately owned commercial, industrial and other similar sites have also been the subject of unauthorised encampments in breach of planning control. The details of these and the impacts suffered by local businesses are contained in the witness statements filed in support of this claim.
3. The London Borough of Havering is a medium sized London Borough and has experienced significant issues associated with unauthorised encampments, including fly tipping, anti social behaviour, violence, public order and property damage. The Claimant has experienced environmental and health risks as a result.
4. The encampments are having a detrimental impact on the borough's residents and businesses, as well as the enjoyment of public open spaces and sporting grounds. Existing powers are being undermined and are ineffective. The law is being flouted repeatedly and the Claimant has experienced significant expense both in legal costs and clear up costs. Service of s.77 CJPOA 1994 orders only leads to encampments moving from one site to the next

Defendant's
name and
address

	£
Court fee	
Legal representative's costs	TBC
Issue date	31.7.2019

Details of claim *(continued)*

and has not deterred the unauthorised encampments from forming further encampments within the Borough.

5. For the reasons set out in the witness statements, it is necessary and expedient for the promotion and protection of the interests of the inhabitants of Havering and to prevent further apprehended breaches of planning control and to prevent further acts of anti-social behaviour to seek an injunction to prevent repeated establishment of unauthorised encampments.

6. It is necessary to bring these proceedings against persons unknown and to deter any unauthorised encampments on specified sites by such persons. It is not possible to identify all of the individuals who have formed part of these unauthorised encampments, many of whom are not prepared to identify themselves. The draft order attached to this claim form recognises that a more limited order should be sought against persons unknown. Accordingly, the order sought confines the scope of the injunction against persons unknown to specified areas within the Borough.

Statement of Truth

*(I believe)(The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement.

Full name Mandeep Mehat (on behalf of John William Jones Deputy Director of Legal and Governance)

Name of claimant's legal representative's firm London Borough of Havering Legal Services

signed



~~*(Claimant)(Litigation friend)~~
(Legal representative)

position or office held Interim Principal Lawyer
(if signing on behalf of firm or company)

**delete as appropriate*

LB Havering Legal Services
Enforcement Team
Newham Dockside,
1000 Dockside Road
London
E16 2QU

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

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(106) PERSONS UNKNOWN

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- 59) Maurice Taggart
- 60) Dean Montgomery
- 61) Jason Barton
- 62) Christopher Lawrence
- 63) Brian Alan Clark
- 64) Ben Warbles
- 65) Winnie Maughan
- 66) Kevin Maughan
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- 70) Harry Mochan
- 71) Thomas Machan
- 72) Rosemary Arrowsmith
- 73) Bobby McDonald
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- 76) Leanne Baggott
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- 78) Joseph Jones
- 79) William Williams
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- 81) Joseph Williams
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- 86) Westlay Williams
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- 88) Jordon Lee
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- 90) Samuel Evans
- 91) James Evans
- 92) Manrica Lee
- 93) Jim Obrien
- 94) Martin Hallissey
- 95) Tina O'Neill
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- 97) Anthony Price
- 98) Catherine McCann
- 99) Priscilla Garside
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- 101) Falex Doran
- 102) Marton Doran
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- 104) Ann Connors
- 105) Patrick Connors

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

SCHEDULE 2 – MAP

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

SCHEDULE 3 – LIST OF SITES

Schools

ID	Address	Ownership
1	Abbs Cross Academy and Arts College, Abbs Cross Lane, Hornchurch, RM12 4YB	Public
2	Ardleigh Green Infant School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
3	Ardleigh Green Junior School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
4	Benhurst Primary School, Benhurst Avenue, Hornchurch, RM12 4QS	Public
5	Bower Park Academy, Havering Road, Romford, RM1 4YY	Public
6	Brady Primary School, Wennington Road, Rainham, RM13 9XA	Public
7	Branfil Primary School, Cedar Avenue, Upminster, RM14 2LW	Public
8	Broadford Primary School, Faringdon Avenue, Romford, RM3 8JS	Public
9	Clockhouse Primary School, Clockhouse Lane, Romford, RM5 3QR	Public
10	Corbets Tey School, Harwood Hall Lane, Upminster, RM14 2YQ	Public
11	Crowlands Primary School, London Road, Romford, RM7 9NS	Public
12	Crownfield Infant School, White Hart Lane, Romford, RM7 8JB	Public
13	Crownfield Junior School, White Hart Lane, Romford, RM7 8JB	Public
14	Dame Tipping Church of England Primary School, North Road, Havering-Atte-Bower, Romford, RM4 1PS	Public
15	Drapers' Academy, Settle Road, Romford, RM3 9XR	Public
16	Drapers' Brookside Infant School, Dagnam Park Drive, Romford, RM3 9DJ	Public
17	Drapers' Brookside Junior School, Dagnam Park Drive, Romford, RM3 9DJ	Public
18	Drapers' Maylands Primary School, Settle Road, Romford, RM3 9XR	Public
19	Drapers Pyrgo Priory Primary School, Settle Road, Romford, RM3 9RT	Public
20	Dycorts School, Settle Road, Romford, RM3 9YA	Public
21	Elm Park Primary School, South End Road, Hornchurch, RM12 5UA	Public
22	Emerson Park Academy, Wych Elm Road, Hornchurch, RM11 3AD	Public
23	Engayne Primary School, Severn Drive, Upminster, RM14 1SW	Public
24	Gaynes School, Brackendale Gardens, Upminster, RM14 3UX	Public
25	Gidea Park College, Balgores Lane, Romford, RM2 5JR	Public
26	Gidea Park Primary School, Lodge Avenue, Romford, RM2 5AJ	Public
27	Goodrington School, Walden Road, Hornchurch, RM11 2JT	Public
28	Hacton Primary School, Chepstow Avenue, Hornchurch, RM12 6AU	Public
29	Hall Mead School, Marlborough Gardens, Upminster, RM14 1SF	Public
30	Harold Court Primary School, Church Road, Romford, RM3 0SH	Public
31	Harold Wood Primary School, Recreation Avenue, Romford, RM3 0TH	Public
32	Harrow Lodge Primary School, Rainsford Way, Hornchurch, RM12 4BP	Public
33	Hilldene Primary School, Straight Road, Romford, RM3 7DT	Public
34	Hylands Primary School, Granger Way, Romford, RM1 2RU	Public
35	Immanuel School, Havering Road, Romford, RM1 4HR	Public
36	La Salette Catholic Primary School, Rainham Road, Rainham, RM13 8SR	Public
37	Langtons Infant School, Westland Avenue, Hornchurch, RM11 3SD	Public
38	Langtons Junior Academy, Westland Avenue, Hornchurch, RM11 3SD	Public
39	Marshall's Park Academy, Pettits Lane, Romford, RM1 4EH	Public
40	Mead Primary School, Amersham Road, Romford, RM3 9JD	Public
41	Nelmes Primary School, Wingletye Lane, RM11 3BX	Public
42	Newtons Primary School, Lowen Road, Rainham, RM13 8QR	Public
43	Oakfields Montessori School, Harwood Hall Lane, Upminster, RM14 2YG	Public
44	Oasis Academy: Pinewood, Thistledene Avenue, Romford, RM5 2TX	Public
45	Parklands Infant School, Havering Road, Romford, RM1 4QX	Public
46	Parklands Junior School, Havering Road, Romford, RM1 4QX	Public
47	Parsonage Farm Primary School, Farm Road, Rainham, RM13 9JU	Public
48	R J Mitchell Primary School, Tangmere Crescent, Hornchurch, RM12 5PP	Public
49	Raphael Independent School, Park Lane, Hornchurch, RM11 1XY	Public
50	Ravensbourne School, Neave Crescent, Romford, RM3 8HN	Public
51	Redden Court School, Cotswold Road, Romford, RM3 0TS	Public
52	Rise Park Infant School, Annan Way, Romford, RM1 4UD	Public
53	Rise Park Junior School, Annan Way, Romford, RM1 4UD	Public
54	Sacred Heart of Mary Girls' School, St Marys Lane, Upminster, RM14 2QR	Public
55	Sanders School, Suttons Lane, Hornchurch, RM12 6RT	Public
56	Scargill Infant School, Mungo Park Road, Rainham, RM13 7PL	Public
57	Scargill Junior School, Mungo Park Road, Rainham, RM13 7PL	Public
58	Scotts Primary School, Bonington Road, Hornchurch, RM12 5TD	Public

59	Squirrels Heath Infant School, Salisbury Road, Romford, RM2 5TP	Public
60	Squirrels Heath Junior School, Salisbury Road, Romford, RM2 5TP	Public
61	St Alban's Catholic Primary School, Heron Flight Avenue, Hornchurch, RM12 5LN	Public
62	St Edward's Church of England School and Sixth Form College, London Road, Romford, RM7 9NX	Public
63	St Edward's Church of England Voluntary Aided Primary School, Havering Drive, Romford, RM1 4BT	Public
64	St Joseph's Catholic Primary School, St Mary's Lane, Upminster, RM14 2QB	Public
65	St Mary's Catholic Primary School, Hornchurch Road, Hornchurch, RM12 4TL	Public
66	St Mary's Hare Park Primary School, South Drive, Romford, RM2 6HH	Public
67	St Patrick's Catholic Primary School, Lowshoe Lane, Romford, RM5 2AP	Public
68	St Peter's Catholic Primary School, Dorset Avenue, Romford, RM1 4JA	Public
69	St Ursula's Catholic Infant School, Straight Road, Romford, RM3 7JS	Public
70	St Ursula's Catholic Junior School, Straight Road, Romford, RM3 7JS	Public
71	Suttons Primary School, Suttons Lane, Hornchurch, RM12 6RP	Public
72	The Albany School, Broadstone Road, Hornchurch, RM12 4AJ	Public
73	The Brittons Academy, Ford Lane, Rainham, RM13 7BB	Public
74	The Champion School, Wingletye Lane, Hornchurch, RM11 3BX	Public
75	The Coopers' Company and Coborn School, St Marys Lane, Upminster, RM14 3HS	Public
76	The Frances Bardsley Academy for Girls, Brentwood Road, Romford, RM1 2RR	Public
77	The Harris Academy (formerly Chafford School), Lambs Lane South, Rainham, RM13 9XD	Public
78	The James Oglethorpe Primary School, Ashvale Gardens, Upminster, RM14 3NB	Public
79	The Mawney Foundation School, Mawney Road, Romford, RM7 7HR	Public
80	The Royal Liberty School, Upper Brentwood Road, Romford, RM2 6HJ	Public
81	Towers Infant School, Osborne Road, Hornchurch, RM11 1HP	Public
82	Towers Junior School, Osborne Road, Hornchurch, RM11 1HP	Public
83	Upminster Infant School, St Marys Lane, Upminster, RM14 3BS	Public
84	Upminster Junior School, St Marys Lane, Upminster, RM14 3BS	Public
85	Whybridge Infant School, Ford Lane, Rainham, RM13 7AR	Public
86	Whybridge Junior School, Ford Lane, Rainham, RM13 7AR	Public
87	Rainham Village Primary School & Nursery, Upminster Road South, Rainham RM13 9AA	Public
88	Havering Technical College (Quarles Campus), Tring Gardens, Romford, RM3 9ES	Public
89	Havering College Rainham Campus, New Road, Rainham, RM13 8GP	Public
90	Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3SU	Public
91	Havering College of Further and Higher Education, Ardleigh Green Road, Hornchurch, RM11 2LL	Public

Council Owned Car Parks

ID	Address	Ownership
92	Appleton Way Car Park, Hornchurch	Public
93	Angel Way Multi Storey Car Park, Romford	Public
94	Balgores Square Car Park, Romford	Public
95	Billet Lane Car Park, Hornchurch	Public
96	Cherry Tree Car Park, Rainham	Public
97	Como Street Car Park, Romford	Public
98	Dorrington Gardens Car Park, Hornchurch	Public
99	Elm Park Hotel Car Park, Elm Park	Public
100	Elm Park Library Car Park, Elm Park	Public
101	Fentiman Way Car Park, Hornchurch	Public
102	Front Lane Car Park, Upminster	Public
103	Hoppy Hall Car Park, Upminster	Public
104	Keswick Avenue Car Park, Hornchurch	Public
105	Old Church Rise Car Park, Romford	Public
106	Rex Close Car Park, Romford	Public
107	Slaney Road Car Park, Romford	Public
108	Town Hall 3/4, Romford	Public
109	Town Hall 1/2, Romford	Public
110	Viking Way Car Park, Rainham	Public
111	Wilson Close Car Park, Upminster	Public
112	Woodhall Crescent Car Park, Hornchurch	Public

ID	Address	Ownership
113	Abbey Lane Open Space	
114	Amersham Road	
115	Balgores Lane playing field	
116	Barham Close	
117	Bedfords Park	
118	Berwick Woods	
119	Bretons Outdoor Recreation Ground	
120	Briar Road	
121	Brittons Playing Field	
122	Brookway play area	
123	Broxhill Centre	
124	Central Park	
125	Chelmsford Avenue Playsite	
126	Chelmsford Avenue/ Galleywood Crescent	
127	Chudleigh Road open Space	
128	Clematis Close	
129	Clockhouse Gardens	
130	Collier Row link	
131	Collier Row Recreation Ground Pedestrian gate	
132	Cornflower Way open Space	
133	Coronation Gardens	
134	Cottons Park	
135	Cranham Brickfields Sunnycroft Gdns	
136	Dagnam Park	
137	Elliots Field	
138	Elm Close / Elm Road	
139	Farringdon Flood Lagoon	
140	Fielders Sports Ground	
141	Fleet Close play site	
142	Forest Row Centre	
143	Forest Row play site	
144	Gaynes Parkway	
145	Gidea Park Sports Ground	
146	Gooshay Drive/Gooshay Gardens	
147	Gooshay Drive next to A12/ Melksham Drive	
148	Gooshay Drive/St Neots Road and Hariesden Road	
149	Grenfell Park	
150	Hacton Parkway and Playsite	
151	Hall Lane Mini Golf	
152	Harold Wood Park	
153	Harrow Lodge Park	
154	Havering Country Park	
155	Havering Playing Field	
156	Havering Road opposite Moray Way	
157	Havering Village Green	
158	Havering Well Garden	
159	Haynes Park	
160	Hilldene Ave/Nth Hill Drive	
161	o/s 25 Nth Hill Drive	
162	o/s 45 Nth Hill Drive	
163	Nth Hill Drive/ Taunton Road	
164	Taunton Rd/Barnstable Rd	
165	180 Taunton Rd	
166	Taunton Rd/Noak Hill Rd	
167	Ashbourne Rd/Lewes Rd	
168	Ashbourne Road/ Aylsham Lane	
169	Ashbourne Road	
170	Hornchurch Stadium	
171	Hylands Park	
172	Jutsums Recreation Ground	
173	Keats Avenue playsite	
174	Kew Close	
175	King Georges Playing Field	
176	Langtons Gardens	
177	Lamson Road, Rainham Marshes Nature Reserve	

178	Lawns Park	
179	Lessa Playsite and Open Space	
180	Lodge Farm Park	
181	Louis Marchesi Playsite (Maybank)	
182	Mardyke Adventure Playground and Open Space	
183	Mrtyle Road	
184	Noak Hill Sports Ground	
185	North Hill Recreation Ground	
186	Nth Romford Community Centre	
187	Oldchurch Park	
188	Painsbrook Open Space Harold Wood	
189	Painsbrook Way Open Space Harold Hill	
190	Park Lane Recreation Ground	
191	Parklands	
192	Priory Road Open Space	
193	Priory Road opposite Priory Path	
194	Priory Path	
195	Queens Theatre	
196	Rainham Recreation Ground	
197	Raphael Park	
198	Rise Park	
199	Rise Park Boulevard	
200	Sheffield Drive open space	
201	Spring Farm Park	
202	Stratton Wood	
203	St Andrews Park	
204	St Neots - Barnsley Road	
205	Sunflower Way flood lagoon	
206	Open Space Jarvis Way	
207	St Neots Open Area adj to Penzance Road	
208	St Neots play site	
209	Suttons Parkway	
210	The Dell, Hornchurch	
211	The Glens Elm Park	
212	The Glens, Rainham	
213	Tyle Green	
214	Tylers Common	
215	Upminster Hall Playing Field	
216	Upminster Park	
217	Westlands	
218	Whitchurch Road	
219	White Hart Lane/Cross Road	
220	Whybridge Close open space	
221	Wincanton Road open space/ Tees Drive	
222	Windmill Field	
223	Kings Lynn Drive/ Dartfields	
224	Dunstable Road	
225	o/s No. 132 Chatteris Ave	
226	Trowbridge Road	
227	Kingsbridge Circus	
228	Dewsbury Road/Farringdon Ave	
229	Halesworth Road/ Kettering Road	
230	Cambourne Ave opp. Halesworth Road	
231	Petersfield Ave/ Dagnam Park Drive	
232	Dagnam Park Drive / Sheffield Drive	
233	Dagnam Park Drive/Dagnam Park Square	
234	Dagnam Park Drive/ Dagnam Park Close	
235	Wingletye Lane between Upminster Road & Maywin Drive	
236	Between Hacton Lane & Kenley Gardens	
237	Between Hacton Lane & Clements Way	
238	Between Hacton Lane & Bevin Way	
239	Lilliput open space	
240	Jubilee Park , Old Church Road	
241	Queens Hospital vacant land site	
242	Hornchurch Country Park, Squadron Approach	
243	Ingrebourne Hill, Rainham Road	FORESTRY

244	Orange Tree Hill fields	
245	Rainham Creekside Path	
246	Stirling Close Open Space Rainham	
247	Rush Green Gardens Open Space	
248	Rainham Road opposite Thorogood Way	
249	Chadwick Drive open space, Harold Wood,	
250	Havering-atte-Bower Cricket Ground	
251	The Green, Wennington	
252	Duck Wood	
253	Tylers Wood	FORESTRY
254	Shoulder of Mutton Wood	
255	Hatters Wood	
256	Sage wood	
257	upminster cemetery	
258	rainham marshes	
259	Ingrebourne Valley North of A1306	
260	Whitchurch Road opp 118 - 158	
261	Federation Jewish Cemetery	
262	A12/Whitelands Way Bund, Whitelands Way, Romford	
263	Edenhall Road opp 24 & 28 Edenhall Road	
264	Kingsbridge Close	
265	Craven Gardens land adjacent to Lodge Lane	
266	Fairford Way / Petersfield Avenue	
267	Briscoe Road Verge, Kenway,	
268	Romford Library Gardens	
269	Crow Lane Cemetery	
270	St. Francis Hospice - Havering-Atte-Bower	
271	Harold Court Woods	FORESTRY
272	Pages Wood	FORESTRY
273	Berwick Glades	FORESTRY
274	Bonnetts Wood	FORESTRY
275	Thames Chase Forest Centre	FORESTRY
276	Folkes Lane Woodland	FORESTRY
277	Belhus Country Park	
278	Ockendon Road Grass Verge - adj Huntsman and Hounds	
279	Tern Gardens	

IN THE HIGH COURT OF JUSTICE

Claim Number:

QUEEN'S BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972
AND S187B TOWN AND COUNTRY PLANNING ACT 1990
AND S1 ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

-and-

(1) WILLIAMS STOKES & 104 OTHER NAMED DEFENDANTS NAMED IN
SCHEDULE 1

(106) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE LONDON BOROUGH OF HAVERING

Defendants

ORDER

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

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

POWER OF ARREST

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

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

- The defendant shall be brought before the judge within a period of 24 hours beginning at the time of their arrest

- A constable shall inform the person on whose application the injunction was granted forthwith where the defendant is arrested under these powers

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

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

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

AND UPON READING THE PAPERS AND HEARING THE CLAIM FOR THE FINAL INJUNCTION AND DISPOSAL OF THE CLAIM

IT IS ORDERED THAT:

Until _____, The First to One Hundred-Fifth are forbidden from:

1. Setting up an encampment on any land within the London Borough of Havering unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the London Borough of Havering without written permission from the Local Planning Authority, or, planning permission granted by the Secretary of State or in accordance with statutory permitted development rights
3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the London Borough of Havering or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The One Hundred-Sixth Defendant (person unknown) are forbidden from:

6. Setting up an encampment on any land identified on the attached map at Schedule 2 and list of sites at Schedule 3 without written permission from the local planning authority, or, planning permission granted by the Secretary of State in accordance with statutory permitted development rights
7. From entering and/or occupying any part of the land identified on the attached map at Schedule 2 and list of sites and Schedule 3 for residential purposes (temporary or

otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia

8. From bringing onto the Land or stationing on the Land any caravans/mobile homes other than when driving through the London Borough of Havering or in compliance with the parking orders regulating the use of car parks or with express permission from the owners of the land.
9. Deposit or cause to be deposited, controlled waste in or on the Land unless an waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.
10. There be a power of arrest attached to prohibitions 1-9 of this order

The Land in this order means:

11. For the First to One Hundred-Fifth Defendants, all land within the London Borough of Havering as appears within the marked blue outline on the attached map at Schedule 2 of this Order.
12. For the One Hundred-Sixth Defendant (persons unknown) all the land marked on the map at Schedule 2 of this Order and identified by the key to the map and numbered 1 to 279, further details of which are on the list at Schedule 3 of this Order.
13. Service of this Order shall be by affixing a copy of this Order in a transparent envelope, or laminated copy, in a prominent position on the land.
14. The Defendants may each of them, or anyone notified of this Order, apply to the Court on 72 hours written notice to the Court and the Claimant to vary or discharge this order (or so much of it as affects that person)
15. The Defendants shall pay the Claimant's costs summarily assessed in the sum of £ _____

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

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

INTERPRETATION OF THIS ORDER

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

COMMUNICATIONS WITH THE COURT

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

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

SCHEDULE 1 – LIST OF DEFENDANTS

- 2) Craig Reece
- 3) Mohammed Nadeer
- 4) Brian Stokes
- 5) Michael Doherty
- 6) Mr J Cassidy
- 7) John Smith
- 8) Jonathan Ashton
- 9) James Robert Manning
- 10) Gary Ward
- 11) Abigail Eldridge
- 12) Patrick Doran
- 13) Marshall Tattam
- 14) Marshall William Tattam
- 15) James Allen
- 16) Patrick Stokes
- 17) Patrick Stokes (2)
- 18) Martin McDonagh
- 19) Mathew McGrory
- 20) Thomas Stokes
- 21) Tom Seokes
- 22) Russell Francis Stanley
- 23) Roberto Silva
- 24) Charley Delaney
- 25) Patrick Anthony McDonagh
- 26) Patrick McDonagh

- 27) Michael Lawrence
- 28) Edward McDonagh
- 29) Thurston Bros
- 30) John Walter Thurston
- 31) Lawrence Connors
- 32) William Stokes (2)
- 33) Gerry Connors
- 34) Guy Lidbetter
- 35) Lorna Upton
- 36) Andrew Gray
- 37) Joan Conner
- 38) Mark Fitzgerald
- 39) Anthony James
- 40) Celine Power
- 41) John Doran
- 42) Arthur Connors
- 43) Christopher Stokes
- 44) Patrick Stowes
- 45) John Stokes
- 46) John Paul Nevin
- 47) Alan George Baker
- 48) Micheal Price
- 49) Tom Donovan
- 50) John Reilly
- 51) Kathleen Stokes
- 52) Kathleen Stokes (2)
- 53) Christopher Lawson
- 54) Eddie Lawrence
- 55) Alexis Maughan
- 56) Ellen Stokes
- 57) Stephen Stokes
- 58) Michael McDonagh
- 59) Maurice Taggart
- 60) Dean Montgomery
- 61) Jason Barton
- 62) Christopher Lawrence
- 63) Brian Alan Clark
- 64) Ben Warbles
- 65) Winnie Maughan
- 66) Kevin Maughan
- 67) Ann Nevin
- 68) Jaye Price
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- 70) Harry Mochan
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- 75) Elizabeth Stewart
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- 78) Joseph Jones
- 79) William Williams
- 80) Christine Williams
- 81) Joseph Williams
- 82) Charlene Jones
- 83) Tony Jones
- 84) Martin Bryant
- 85) Sharon Fraser
- 86) Westlay Williams
- 87) Luke Clee
- 88) Jordon Lee
- 89) John Lee
- 90) Samuel Evans
- 91) James Evans
- 92) Manrica Lee
- 93) Jim Obrien
- 94) Martin Hallissey
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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

SCHEDULE 2 – MAP

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

SCHEDULE 3 - LIST OF SITES

Schools

ID	Address	Ownership
1	Abbs Cross Academy and Arts College, Abbs Cross Lane, Hornchurch, RM12 4YB	Public
2	Ardleigh Green Infant School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
3	Ardleigh Green Junior School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
4	Benhurst Primary School, Benhurst Avenue, Hornchurch, RM12 4QS	Public
5	Bower Park Academy, Havering Road, Romford, RM1 4YY	Public
6	Brady Primary School, Wennington Road, Rainham, RM13 9XA	Public
7	Branfil Primary School, Cedar Avenue, Upminster, RM14 2LW	Public
8	Broadford Primary School, Faringdon Avenue, Romford, RM3 8JS	Public
9	Clockhouse Primary School, Clockhouse Lane, Romford, RM5 3QR	Public
10	Corbets Tey School, Harwood Hall Lane, Upminster, RM14 2YQ	Public
11	Crowlands Primary School, London Road, Romford, RM7 9NS	Public
12	Crownfield Infant School, White Hart Lane, Romford, RM7 8JB	Public
13	Crownfield Junior School, White Hart Lane, Romford, RM7 8JB	Public
14	Dame Tipping Church of England Primary School, North Road, Havering-Atte-Bower, Romford, RM4 1PS	Public
15	Drapers' Academy, Settle Road, Romford, RM3 9XR	Public
16	Drapers' Brookside Infant School, Dagnam Park Drive, Romford, RM3 9DJ	Public
17	Drapers' Brookside Junior School, Dagnam Park Drive, Romford, RM3 9DJ	Public
18	Drapers' Maylands Primary School, Settle Road, Romford, RM3 9XR	Public
19	Drapers' Pyrgo Priory Primary School, Settle Road, Romford, RM3 9RT	Public
20	Dycorts School, Settle Road, Romford, RM3 9YA	Public
21	Elm Park Primary School, South End Road, Hornchurch, RM12 5UA	Public
22	Emerson Park Academy, Wych Elm Road, Hornchurch, RM11 3AD	Public
23	Engayne Primary School, Severn Drive, Upminster, RM14 1SW	Public
24	Gaynes School, Brackendale Gardens, Upminster, RM14 3UX	Public
25	Gidea Park College, Balgores Lane, Romford, RM2 5JR	Public
26	Gidea Park Primary School, Lodge Avenue, Romford, RM2 5AJ	Public
27	Goodrington School, Walden Road, Hornchurch, RM11 2JT	Public
28	Hacton Primary School, Chepstow Avenue, Hornchurch, RM12 6AU	Public
29	Hall Mead School, Marlborough Gardens, Upminster, RM14 1SF	Public
30	Harold Court Primary School, Church Road, Romford, RM3 0SH	Public
31	Harold Wood Primary School, Recreation Avenue, Romford, RM3 0TH	Public
32	Harrow Lodge Primary School, Rainsford Way, Hornchurch, RM12 4BP	Public
33	Hilldene Primary School, Straight Road, Romford, RM3 7DT	Public
34	Hylands Primary School, Granger Way, Romford, RM1 2RU	Public
35	Immanuel School, Havering Road, Romford, RM1 4HR	Public
36	La Salette Catholic Primary School, Rainham Road, Rainham, RM13 8SR	Public
37	Langtons Infant School, Westland Avenue, Hornchurch, RM11 3SD	Public
38	Langtons Junior Academy, Westland Avenue, Hornchurch, RM11 3SD	Public
39	Marshalls Park Academy, Pettits Lane, Romford, RM1 4EH	Public
40	Mead Primary School, Amersham Road, Romford, RM3 9JD	Public
41	Nelmes Primary School, Wingletye Lane, RM11 3BX	Public
42	Newtons Primary School, Lowen Road, Rainham, RM13 8QR	Public
43	Oakfields Montessori School, Harwood Hall Lane, Upminster, RM14 2YG	Public
44	Oasis Academy: Pinewood, Thistledene Avenue, Romford, RM5 2TX	Public
45	Parklands Infant School, Havering Road, Romford, RM1 4QX	Public
46	Parklands Junior School, Havering Road, Romford, RM1 4QX	Public
47	Parsonage Farm Primary School, Farm Road, Rainham, RM13 9JU	Public
48	R J Mitchell Primary School, Tangmere Crescent, Hornchurch, RM12 5PP	Public
49	Raphael Independent School, Park Lane, Hornchurch, RM11 1XY	Public
50	Ravensbourne School, Neave Crescent, Romford, RM3 8HN	Public
51	Redden Court School, Cotswold Road, Romford, RM3 0TS	Public
52	Rise Park Infant School, Annan Way, Romford, RM1 4UD	Public
53	Rise Park Junior School, Annan Way, Romford, RM1 4UD	Public
54	Sacred Heart of Mary Girls' School, St Marys Lane, Upminster, RM14 2QR	Public
55	Sanders School, Suttons Lane, Hornchurch, RM12 6RT	Public
56	Scargill Infant School, Mungo Park Road, Rainham, RM13 7PL	Public
57	Scargill Junior School, Mungo Park Road, Rainham, RM13 7PL	Public
58	Scotts Primary School, Bonington Road, Hornchurch, RM12 5TD	Public

59	<u>Squirrels Heath Infant School, Salisbury Road, Romford, RM2 5TP</u>	Public
60	<u>Squirrels Heath Junior School, Salisbury Road, Romford, RM2 5TP</u>	Public
61	<u>St Alban's Catholic Primary School, Heron Flight Avenue, Hornchurch, RM12 5LN</u>	Public
62	<u>St Edward's Church of England School and Sixth Form College, London Road, Romford, RM7 9NX</u>	Public
63	<u>St Edward's Church of England Voluntary Aided Primary School, Havering Drive, Romford, RM1 4BT</u>	Public
64	<u>St Joseph's Catholic Primary School, St Mary's Lane, Upminster, RM14 2OB</u>	Public
65	<u>St Mary's Catholic Primary School, Hornchurch Road, Hornchurch, RM12 4TL</u>	Public
66	<u>St Mary's Hare Park Primary School, South Drive, Romford, RM2 6HH</u>	Public
67	<u>St Patrick's Catholic Primary School, Lowshoe Lane, Romford, RM5 2AP</u>	Public
68	<u>St Peter's Catholic Primary School, Dorset Avenue, Romford, RM1 4JA</u>	Public
69	<u>St Ursula's Catholic Infant School, Straight Road, Romford, RM3 7JS</u>	Public
70	<u>St Ursula's Catholic Junior School, Straight Road, Romford, RM3 7JS</u>	Public
71	<u>Suttons Primary School, Suttons Lane, Hornchurch, RM12 6RP</u>	Public
72	<u>The Albany School, Broadstone Road, Hornchurch, RM12 4AJ</u>	Public
73	<u>The Brittons Academy, Ford Lane, Rainham, RM13 7BB</u>	Public
74	<u>The Champion School, Wingletye Lane, Hornchurch, RM11 3BX</u>	Public
75	<u>The Coopers' Company and Coborn School, St Marys Lane, Upminster, RM14 3HS</u>	Public
76	<u>The Frances Bardsley Academy for Girls, Brentwood Road, Romford, RM1 2RR</u>	Public
77	<u>The Harris Academy (formerly Chafford School), Lambs Lane South, Rainham, RM13 9XD</u>	Public
78	<u>The James Oglethorpe Primary School, Ashvale Gardens, Upminster, RM14 3NB</u>	Public
79	<u>The Mawney Foundation School, Mawney Road, Romford, RM7 7HR</u>	Public
80	<u>The Royal Liberty School, Upper Brentwood Road, Romford, RM2 6HJ</u>	Public
81	<u>Towers Infant School, Osborne Road, Hornchurch, RM11 1HP</u>	Public
82	<u>Towers Junior School, Osborne Road, Hornchurch, RM11 1HP</u>	Public
83	<u>Upminster Infant School, St Marys Lane, Upminster, RM14 3BS</u>	Public
84	<u>Upminster Junior School, St Marys Lane, Upminster, RM14 3BS</u>	Public
85	<u>Whybridge Infant School, Ford Lane, Rainham, RM13 7AR</u>	Public
86	<u>Whybridge Junior School, Ford Lane, Rainham, RM13 7AR</u>	Public
87	<u>Rainham Village Primary School & Nursery, Upminster Road South, Rainham RM13 9AA</u>	Public
88	<u>Havering Technical College (Quarles Campus), Tring Gardens, Romford, RM3 9ES</u>	Public
89	<u>Havering College Rainham Campus, New Road, Rainham, RM13 8GP</u>	Public
90	<u>Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3SU</u>	Public
91	<u>Havering College of Further and Higher Education, Ardleigh Green Road, Hornchurch, RM11 2LL</u>	Public

Council Owned Car Parks

ID	Address	Ownership
92	Appleton Way Car Park, Hornchurch	Public
93	Angel Way Multi Storey Car Park, Romford	Public
94	Balgores Square Car Park, Romford	Public
95	Billet Lane Car Park, Hornchurch	Public
96	Cherry Tree Car Park, Rainham	Public
97	Como Street Car Park, Romford	Public
98	Dorrington Gardens Car Park, Hornchurch	Public
99	Elm Park Hotel Car Park, Elm Park	Public
100	Elm Park Library Car Park, Elm Park	Public
101	Fentiman Way Car Park, Hornchurch	Public
102	Front Lane Car Park, Upminster	Public
103	Hoppy Hall Car Park, Upminster	Public
104	Keswick Avenue Car Park, Hornchurch	Public
105	Old Church Rise Car Park, Romford	Public
106	Rex Close Car Park, Romford	Public
107	Slaney Road Car Park, Romford	Public
108	Town Hall 3/4, Romford	Public
109	Town Hall 1/2, Romford	Public
110	Viking Way Car Park, Rainham	Public
111	Wilson Close Car Park, Upminster	Public
112	Woodhall Crescent Car Park, Hornchurch	Public

ID	Address	Ownership
113	Abbey Lane Open Space	
114	Amersham Road	
115	Balgores Lane playing field	
116	Barham Close	
117	Bedfords Park	
118	Berwick Woods	
119	Bretons Outdoor Recreation Ground	
120	Briar Road	
121	Brittons Playing Field	
122	Brookway play area	
123	Broxhill Centre	
124	Central Park	
125	Chelmsford Avenue Playsite	
126	Chelmsford Avenue/ Galleywood Crescent	
127	Chudleigh Road open Space	
128	Clematis Close	
129	Clockhouse Gardens	
130	Collier Row link	
131	Collier Row Recreation Ground Pedestrian gate	
132	Cornflower Way open Space	
133	Coronation Gardens	
134	Cottons Park	
135	Cranham Brickfields Sunnycroft Gdns	
136	Dagnam Park	
137	Elllots Field	
138	Elm Close / Elm Road	
139	Farringdon Flood Lagoon	
140	Fielders Sports Ground	
141	Fleet Close play site	
142	Forest Row Centre	
143	Forest Row play site	
144	Gaynes Parkway	
145	Gidea Park Sports Ground	
146	Gooshay Drive/Gooshay Gardens	
147	Gooshay Drive next to A12/ Melksham Drive	
148	Gooshay Drive/St Neots Road and Harlesden Road	
149	Grenfell Park	
150	Hacton Parkway and Playsite	
151	Hall Lane Mini Golf	
152	Harold Wood Park	
153	Harrow Lodge Park	
154	Havering Country Park	
155	Havering Playing Field	
156	Havering Road opposite Moray Way	
157	Havering Village Green	
158	Havering Well Garden	
159	Haynes Park	
160	Hilldene Ave/Nth Hill Drive	
161	o/s 25 Nth Hill Drive	
162	o/s 45 Nth Hill Drive	
163	Nth Hill Drive/ Taunton Road	
164	Taunton Rd/Barnstable Rd	
165	180 Taunton Rd	
166	Taunton Rd/Noak Hill Rd	
167	Ashbourne Rd/Lewes Rd	
168	Ashbourne Road/ Aylsham Lane	
169	Ashbourne Road	
170	Hornchurch Stadium	
171	Hylands Park	
172	Jutsums Recreation Ground	
173	Keats Avenue playsite	
174	Kew Close	
175	King Georges Playing Field	
176	Langtons Gardens	
177	Lamson Road, Rainham Marshes Nature Reserve	

178	Lawns Park	
179	Lessa Playsite and Open Space	
180	Lodge Farm Park	
181	Louis Marchesi Playsite (Maybank)	
182	Mardyke Adventure Playground and Open Space	
183	Mrtyle Road	
184	Noak Hill Sports Ground	
185	North Hill Recreation Ground	
186	Nth Romford Community Centre	
187	Oldchurch Park	
188	Painsbrook Open Space Harold Wood	
189	Painsbrook Way Open Space Harold Hill	
190	Park Lane Recreation Ground	
191	Parklands	
192	Priory Road Open Space	
193	Priory Road opposite Priory Path	
194	Priory Path	
195	Queens Theatre	
196	Rainham Recreation Ground	
197	Raphael Park	
198	Rise Park	
199	Rise Park Boulevard	
200	Sheffield Drive open space	
201	Spring Farm Park	
202	Stratton Wood	
203	St Andrews Park	
204	St Neots - Barnsley Road	
205	Sunflower Way flood lagoon	
206	Open Space Jarvis Way	
207	St Neots Open Area adj to Penzance Road	
208	St Neots play site	
209	Sultons Parkway	
210	The Dell, Hornchurch	
211	The Glens Elm Park	
212	The Glens, Rainham	
213	Tyle Green	
214	Tylers Common	
215	Upminster Hall Playing Field	
216	Upminster Park	
217	Westlands	
218	Whitchurch Road	
219	White Hart Lane/Cross Road	
220	Whybridge Close open space	
221	Wincanton Road open space/ Tees Drive	
222	Windmill Field	
223	Kings Lynn Drive/ Dartfields	
224	Dunstable Road	
225	o/s No. 132 Chatteris Ave	
226	Trowbridge Road	
227	Kingsbridge Circus	
228	Dewsbury Road/Farringdon Ave	
229	Halesworth Road/ Kettering Road	
230	Cambourne Ave opp. Halesworth Road	
231	Petersfield Ave/ Dagnam Park Drive	
232	Dagnam Park Drive / Sheffield Drive	
233	Dagnam Park Drive/Dagnam Park Square	
234	Dagnam Park Drive/ Dagnam Park Close	
235	Wingletye Lane between Upminster Road & Maywin Drive	
236	Between Hacton Lane & Kenley Gardens	
237	Between Hacton Lane & Clements Way	
238	Between Hacton Lane & Bevin Way	
239	Lilliput open space	
240	Jubilee Park , Old Church Road	
241	Queens Hospital vacant land site	
242	Hornchurch Country Park, Squadron Approach	
243	Ingrebourne Hill, Rainham Road	FORESTRY

244	Orange Tree Hill fields	
245	Rainham Creekside Path	
246	Stirling Close Open Space Rainham	
247	Rush Green Gardens Open Space	
248	Rainham Road opposite Thorogood Way	
249	Chadwick Drive open space, Harold Wood,	
250	Havering-atte-Bower Cricket Ground	
251	The Green, Wennington	
252	Duck Wood	
253	Tylers Wood	FORESTRY
254	Shoulder of Mutton Wood	
255	Hatters Wood	
256	Sage wood	
257	upminster cemetery	
258	rainham marshes	
259	Ingrebourne Valley North of A1306	
260	Whitchurch Road opp 118 - 158	
261	Federation Jewish Cemetery	
262	A12/Whitelands Way Bund, Whitelands Way, Romford	
263	Edenhall Road opp 24 & 28 Edenhall Road	
264	Kingsbridge Close	
265	Craven Gardens land adjacent to Lodge Lane	
266	Fairford Way / Petersfield Avenue	
267	Briscoe Road Verge, Kenway,	
268	Romford Library Gardens	
269	Crow Lane Cemetry	
270	St. Francis Hospice - Havering-Atte-Bower	
271	Harold Court Woods	FORESTRY
272	Pages Wood	FORESTRY
273	Berwick Glades	FORESTRY
274	Bonnetts Wood	FORESTRY
275	Thames Chase Forest Centre	FORESTRY
276	Folkes Lane Woodland	FORESTRY
277	Belhus Country Park	
278	Ockendon Road Grass Verge - adj Huntsman and Hounds	
279	Tern Gardens	

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Name of court High Court of Justice, QBD		Claim no.	
Fee account no. (if applicable) PA079778		Help with Fees – Ref. no. (if applicable) H W F - - - - -	
Warrant no. (if applicable)			
Claimant's name (including ref.) London Borough of Havering			
Defendant's name (including ref.) (1) WILLIAMS STOKES & 104 OTHER NAMED DEFENDANTS NAMED IN SCHEDULE 1 (106) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE LONDON BOROUGH OF HAVERING			
Date			

1. What is your name or, if you are a legal representative, the name of your firm?

London Borough of Havering

2. Are you a Claimant Defendant Legal Representative

Other (please specify) _____

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

An application for alternative service, as per the attached draft order

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with? at a hearing without a hearing

at a telephone hearing

6. How long do you think the hearing will last? _____ Hours Minutes

Is this time estimate agreed by all parties? Yes No

7. Give details of any fixed trial date or period _____

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application? None – without notice

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

Statement of Truth

(I believe) (The applicant believes) that the facts stated in this section (and any continuation sheets) are true.

Signed _____ Dated _____
Applicant('s legal representative)('s litigation friend)

Full name _____

Name of applicant's legal representative's firm _____

Position or office held _____
(if signing on behalf of firm or company)

11. Signature and address details

Signed  Dated: 31/7/19
Applicant('s legal representative)

Position or office held: INTERIM PRINCIPAL LAWYER
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

LONDON BOROUGH OF
HARINGEY, LEGAL SERVICES
ENFORCEMENT, NEWHAM
DOCKSIDE, 1000 DOCKSIDE
ROAD, LONDON

Postcode E16 2Q4

If applicable	
Phone no.	
Fax no.	
DX no.	
Ref no.	

E-mail address

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 FORMING UNAUTHORISED ENCAMPMENTS WITHIN
THE LONDON BOROUGH OF HAVERING**

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 Claimant's 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 ^{Havering} [REDACTED] between 2016 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,

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 numerous lever arch files of supporting statements and evidence in this matter. 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 paperwork 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 their families. Accordingly, the Claimant 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/or by providing a digital link to its website where the evidence can be viewed and downloaded. Further the Claimant will 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 Claimant 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 or by using the provided digital link to the Claimant's website.

STATEMENT OF TRUTH

I believe that the contents of this statement are true.

Signed : 

Mandeep Mehat

Dated : ^{31st}  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

SCHEDULE 1 – LIST OF DEFENDANTS

- 2) Craig Reece
- 3) Mohammed Nadeer
- 4) Brian Stokes
- 5) Michael Doherty
- 6) Mr J Cassidy
- 7) John Smith
- 8) Jonathan Ashton
- 9) James Robert Manning
- 10) Gary Ward
- 11) Abigail Eldridge
- 12) Patrick Doran
- 13) Marshall Tattam
- 14) Marshall William Tattam
- 15) James Allen
- 16) Patrick Stokes
- 17) Patrick Stokes (2)
- 18) Martin McDonagh
- 19) Mathew McGrory
- 20) Thomas Stokes
- 21) Tom Seokes
- 22) Russell Francis Stanley
- 23) Roberto Silva
- 24) Charley Delaney
- 25) Patrick Anthony McDonagh
- 26) Patrick McDonagh

- 27) Michael Lawrence
- 28) Edward McDonagh
- 29) Thurston Bros
- 30) John Walter Thurston
- 31) Lawrence Connors
- 32) William Stokes (2)
- 33) Gerry Connors
- 34) Guy Lidbetter
- 35) Lorna Upton
- 36) Andrew Gray
- 37) Joan Conner
- 38) Mark Fitzgerald
- 39) Anthony James
- 40) Celine Power
- 41) John Doran
- 42) Arthur Connors
- 43) Christopher Stokes
- 44) Patrick Stowes
- 45) John Stokes
- 46) John Paul Nevin
- 47) Alan George Baker
- 48) Micheal Price
- 49) Tom Donovan
- 50) John Reilly
- 51) Kathleen Stokes
- 52) Kathleen Stokes (2)
- 53) Christopher Lawson
- 54) Eddie Lawrence
- 55) Alexis Maughan
- 56) Ellen Stokes
- 57) Stephen Stokes
- 58) Michael McDonagh
- 59) Maurice Taggart
- 60) Dean Montgomery
- 61) Jason Barton
- 62) Christopher Lawrence
- 63) Brian Alan Clark
- 64) Ben Warbles
- 65) Winnie Maughan
- 66) Kevin Maughan
- 67) Ann Nevin
- 68) Jaye Price
- 69) Hope Price
- 70) Harry Mochan
- 71) Thomas Machan
- 72) Rosemary Arrowsmith
- 73) Bobby McDonald
- 74) Joseph Stewart

- 75) Elizabeth Stewart
- 76) Leanne Baggott
- 77) Tom Pyman
- 78) Joseph Jones
- 79) William Williams
- 80) Christine Williams
- 81) Joseph Williams
- 82) Charlene Jones
- 83) Tony Jones
- 84) Martin Bryant
- 85) Sharon Fraser
- 86) Westlay Williams
- 87) Luke Clee
- 88) Jordon Lee
- 89) John Lee
- 90) Samuel Evans
- 91) James Evans
- 92) Manrica Lee
- 93) Jim Obrien
- 94) Martin Hallissey
- 95) Tina O'Neill
- 96) Jake Lee
- 97) Anthony Price
- 98) Catherine McCann
- 99) Priscilla Garside
- 100) James Doran
- 101) Falex Doran
- 102) Marton Doran
- 103) Nickola Tomlinson
- 104) Ann Connors
- 105) Patrick Connors

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

SCHEDULE 2 – MAP

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

SCHEDULE 3 – LIST OF SITES

Schools

ID	Address	Ownership
1	<u>Abbs Cross Academy and Arts College, Abbs Cross Lane, Hornchurch, RM12 4YB</u>	Public
2	<u>Ardleigh Green Infant School, Ardleigh Green Road, Hornchurch, RM11 2SP</u>	Public
3	<u>Ardleigh Green Junior School, Ardleigh Green Road, Hornchurch, RM11 2SP</u>	Public
4	<u>Benhurst Primary School, Benhurst Avenue, Hornchurch, RM12 4QS</u>	Public
5	<u>Bower Park Academy, Havering Road, Romford, RM1 4YY</u>	Public
6	<u>Brady Primary School, Wennington Road, Rainham, RM13 9XA</u>	Public
7	<u>Branfil Primary School, Cedar Avenue, Upminster, RM14 2LW</u>	Public
8	<u>Broadford Primary School, Faringdon Avenue, Romford, RM3 8JS</u>	Public
9	<u>Clockhouse Primary School, Clockhouse Lane, Romford, RM5 3QR</u>	Public
10	<u>Corbets Tey School, Harwood Hall Lane, Upminster, RM14 2YQ</u>	Public
11	<u>Crowlands Primary School, London Road, Romford, RM7 9NS</u>	Public
12	<u>Crownfield Infant School, White Hart Lane, Romford, RM7 8JB</u>	Public
13	<u>Crownfield Junior School, White Hart Lane, Romford, RM7 8JB</u>	Public
14	<u>Dame Tipping Church of England Primary School, North Road, Havering-Atte-Bower, Romford, RM4 1PS</u>	Public
15	<u>Drapers' Academy, Settle Road, Romford, RM3 9XR</u>	Public
16	<u>Drapers' Brookside Infant School, Dagnam Park Drive, Romford, RM3 9DJ</u>	Public
17	<u>Drapers' Brookside Junior School, Dagnam Park Drive, Romford, RM3 9DJ</u>	Public
18	<u>Drapers' Maylands Primary School, Settle Road, Romford, RM3 9XR</u>	Public
19	<u>Drapers Pyrgo Priory Primary School, Settle Road, Romford, RM3 9RT</u>	Public
20	<u>Dycorts School, Settle Road, Romford, RM3 9YA</u>	Public
21	<u>Elm Park Primary School, South End Road, Hornchurch, RM12 5UA</u>	Public
22	<u>Emerson Park Academy, Wych Elm Road, Hornchurch, RM11 3AD</u>	Public
23	<u>Engayne Primary School, Severn Drive, Upminster, RM14 1SW</u>	Public
24	<u>Gaynes School, Brackendale Gardens, Upminster, RM14 3UX</u>	Public
25	<u>Gidea Park College, Balgores Lane, Romford, RM2 5JR</u>	Public
26	<u>Gidea Park Primary School, Lodge Avenue, Romford, RM2 5AJ</u>	Public
27	<u>Goodrington School, Walden Road, Hornchurch, RM11 2JT</u>	Public
28	<u>Hacton Primary School, Chepstow Avenue, Hornchurch, RM12 6AU</u>	Public
29	<u>Hall Mead School, Marlborough Gardens, Upminster, RM14 1SF</u>	Public
30	<u>Harold Court Primary School, Church Road, Romford, RM3 0SH</u>	Public
31	<u>Harold Wood Primary School, Recreation Avenue, Romford, RM3 0TH</u>	Public
32	<u>Harrow Lodge Primary School, Rainsford Way, Hornchurch, RM12 4BP</u>	Public
33	<u>Hilldene Primary School, Straight Road, Romford, RM3 7DT</u>	Public
34	<u>Hylands Primary School, Granger Way, Romford, RM1 2RU</u>	Public
35	<u>Immanuel School, Havering Road, Romford, RM1 4HR</u>	Public
36	<u>La Salette Catholic Primary School, Rainham Road, Rainham, RM13 8SR</u>	Public
37	<u>Langtons Infant School, Westland Avenue, Hornchurch, RM11 3SD</u>	Public
38	<u>Langtons Junior Academy, Westland Avenue, Hornchurch, RM11 3SD</u>	Public
39	<u>Marshall's Park Academy, Pettits Lane, Romford, RM1 4EH</u>	Public
40	<u>Mead Primary School, Amersham Road, Romford, RM3 9JD</u>	Public
41	<u>Nelmes Primary School, Wingletye Lane, RM11 3BX</u>	Public
42	<u>Newtons Primary School, Lowen Road, Rainham, RM13 8QR</u>	Public
43	<u>Oakfields Montessori School, Harwood Hall Lane, Upminster, RM14 2YG</u>	Public
44	<u>Oasis Academy: Pinewood, Thistledene Avenue, Romford, RM5 2TX</u>	Public
45	<u>Parklands Infant School, Havering Road, Romford, RM1 4QX</u>	Public
46	<u>Parklands Junior School, Havering Road, Romford, RM1 4QX</u>	Public
47	<u>Parsonage Farm Primary School, Farm Road, Rainham, RM13 9JU</u>	Public
48	<u>R J Mitchell Primary School, Tangmere Crescent, Hornchurch, RM12 5PP</u>	Public
49	<u>Raphael Independent School, Park Lane, Hornchurch, RM11 1XY</u>	Public
50	<u>Ravensbourne School, Neave Crescent, Romford, RM3 8HN</u>	Public
51	<u>Redden Court School, Cotswold Road, Romford, RM3 0TS</u>	Public
52	<u>Rise Park Infant School, Annan Way, Romford, RM1 4UD</u>	Public
53	<u>Rise Park Junior School, Annan Way, Romford, RM1 4UD</u>	Public
54	<u>Sacred Heart of Mary Girls' School, St Marys Lane, Upminster, RM14 2QR</u>	Public
55	<u>Sanders School, Suttons Lane, Hornchurch, RM12 6RT</u>	Public
56	<u>Scargill Infant School, Mungo Park Road, Rainham, RM13 7PL</u>	Public
57	<u>Scargill Junior School, Mungo Park Road, Rainham, RM13 7PL</u>	Public
58	<u>Scotts Primary School, Bonington Road, Hornchurch, RM12 5TD</u>	Public

59	<u>Squirrels Heath Infant School, Salisbury Road, Romford, RM2 5TP</u>	Public
60	<u>Squirrels Heath Junior School, Salisbury Road, Romford, RM2 5TP</u>	Public
61	<u>St Alban's Catholic Primary School, Heron Flight Avenue, Hornchurch, RM12 5LN</u>	Public
62	<u>St Edward's Church of England School and Sixth Form College, London Road, Romford, RM7 9NX</u>	Public
63	<u>St Edward's Church of England Voluntary Aided Primary School, Haverling Drive, Romford, RM1 4BT</u>	Public
64	<u>St Joseph's Catholic Primary School, St Mary's Lane, Upminster, RM14 2QB</u>	Public
65	<u>St Mary's Catholic Primary School, Hornchurch Road, Hornchurch, RM12 4TL</u>	Public
66	<u>St Mary's Hare Park Primary School, South Drive, Romford, RM2 6HH</u>	Public
67	<u>St Patrick's Catholic Primary School, Lowshoe Lane, Romford, RM5 2AP</u>	Public
68	<u>St Peter's Catholic Primary School, Dorset Avenue, Romford, RM1 4JA</u>	Public
69	<u>St Ursula's Catholic Infant School, Straight Road, Romford, RM3 7JS</u>	Public
70	<u>St Ursula's Catholic Junior School, Straight Road, Romford, RM3 7JS</u>	Public
71	<u>Suttons Primary School, Suttons Lane, Hornchurch, RM12 6RP</u>	Public
72	<u>The Albany School, Broadstone Road, Hornchurch, RM12 4AJ</u>	Public
73	<u>The Brittons Academy, Ford Lane, Rainham, RM13 7BB</u>	Public
74	<u>The Champion School, Wingletye Lane, Hornchurch, RM11 3BX</u>	Public
75	<u>The Coopers' Company and Coborn School, St Marys Lane, Upminster, RM14 3HS</u>	Public
76	<u>The Frances Bardsley Academy for Girls, Brentwood Road, Romford, RM1 2RR</u>	Public
77	<u>The Harris Academy (formerly Chafford School), Lambs Lane South, Rainham, RM13 9XD</u>	Public
78	<u>The James Oglethorpe Primary School, Ashvale Gardens, Upminster, RM14 3NB</u>	Public
79	<u>The Mawney Foundation School, Mawney Road, Romford, RM7 7HR</u>	Public
80	<u>The Royal Liberty School, Upper Brentwood Road, Romford, RM2 6HJ</u>	Public
81	<u>Towers Infant School, Osborne Road, Hornchurch, RM11 1HP</u>	Public
82	<u>Towers Junior School, Osborne Road, Hornchurch, RM11 1HP</u>	Public
83	<u>Upminster Infant School, St Marys Lane, Upminster, RM14 3BS</u>	Public
84	<u>Upminster Junior School, St Marys Lane, Upminster, RM14 3BS</u>	Public
85	<u>Whybridge Infant School, Ford Lane, Rainham, RM13 7AR</u>	Public
86	<u>Whybridge Junior School, Ford Lane, Rainham, RM13 7AR</u>	Public
87	<u>Rainham Village Primary School & Nursery, Upminster Road South, Rainham RM13 9AA</u>	Public
88	<u>Haverling Technical College (Quarles Campus), Tring Gardens, Romford, RM3 9ES</u>	Public
89	<u>Haverling College Rainham Campus, New Road, Rainham, RM13 8GP</u>	Public
90	<u>Haverling Sixth Form College, Wingletye Lane, Hornchurch, RM11 3SU</u>	Public
91	<u>Haverling College of Further and Higher Education, Ardleigh Green Road, Hornchurch, RM11 2LL</u>	Public

Council Owned Car Parks

ID	Address	Ownership
92	Appleton Way Car Park, Hornchurch	Public
93	Angel Way Multi Storey Car Park, Romford	Public
94	Balgores Square Car Park, Romford	Public
95	Billet Lane Car Park, Hornchurch	Public
96	Cherry Tree Car Park, Rainham	Public
97	Como Street Car Park, Romford	Public
98	Dorrington Gardens Car Park, Hornchurch	Public
99	Elm Park Hotel Car Park, Elm Park	Public
100	Elm Park Library Car Park, Elm Park	Public
101	Fentiman Way Car Park, Hornchurch	Public
102	Front Lane Car Park, Upminster	Public
103	Hoppy Hall Car Park, Upminster	Public
104	Keswick Avenue Car Park, Hornchurch	Public
105	Old Church Rise Car Park, Romford	Public
106	Rex Close Car Park, Romford	Public
107	Slaney Road Car Park, Romford	Public
108	Town Hall 3/4, Romford	Public
109	Town Hall 1/2, Romford	Public
110	Viking Way Car Park, Rainham	Public
111	Wilson Close Car Park, Upminster	Public
112	Woodhall Crescent Car Park, Hornchurch	Public

Parks and Open Spaces

ID	Address	Ownership
113	Abbey Lane Open Space	
114	Amersham Road	
115	Balgores Lane playing field	
116	Barham Close	
117	Bedfords Park	
118	Berwick Woods	
119	Bretons Outdoor Recreation Ground	
120	Briar Road	
121	Brittons Playing Field	
122	Brookway play area	
123	Broxhill Centre	
124	Central Park	
125	Chelmsford Avenue Playsite	
126	Chelmsford Avenue/ Galleywood Crescent	
127	Chudleigh Road open Space	
128	Clematis Close	
129	Clockhouse Gardens	
130	Collier Row link	
131	Collier Row Recreation Ground Pedestrian gate	
132	Cornflower Way open Space	
133	Coronation Gardens	
134	Cottons Park	
135	Cranham Brickfields Sunnycroft Gdns	
136	Dagnam Park	
137	Elliots Field	
138	Elm Close / Elm Road	
139	Farringdon Flood Lagoon	
140	Fielders Sports Ground	
141	Fleet Close play site	
142	Forest Row Centre	
143	Forest Row play site	
144	Gaynes Parkway	
145	Gidea Park Sports Ground	
146	Gooshay Drive/Gooshay Gardens	
147	Gooshay Drive next to A12/ Melksham Drive	
148	Gooshay Drive/St Neots Road and Harlesden Road	
149	Grenfell Park	
150	Hacton Parkway and Playsite	
151	Hall Lane Mini Golf	
152	Harold Wood Park	
153	Harrow Lodge Park	
154	Havering Country Park	
155	Havering Playing Field	
156	Havering Road opposite Moray Way	
157	Havering Village Green	
158	Havering Well Garden	
159	Haynes Park	
160	Hilldene Ave/Nth Hill Drive	
161	o/s 25 Nth Hill Drive	
162	o/s 45 Nth Hill Drive	
163	Nth Hill Drive/ Taunton Road	
164	Taunton Rd/Barnstable Rd	
165	180 Taunton Rd	
166	Taunton Rd/Noak Hill Rd	
167	Ashbourne Rd/Lewes Rd	
168	Ashbourne Road/ Aylsham Lane	
169	Ashbourne Road	
170	Hornchurch Stadium	
171	Hylands Park	
172	Jutsums Recreation Ground	
173	Keats Avenue playsite	
174	Kew Close	
175	King Georges Playing Field	
176	Langtons Gardens	
177	Lamson Road, Rainham Marshes Nature Reserve	

178	Lawns Park	
179	Lessa Playsite and Open Space	
180	Lodge Farm Park	
181	Louis Marchesi Playsite (Maybank)	
182	Mardyke Adventure Playground and Open Space	
183	Mrtyle Road	
184	Noak Hill Sports Ground	
185	North Hill Recreation Ground	
186	Nth Romford Community Centre	
187	Oldchurch Park	
188	Painsbrook Open Space Harold Wood	
189	Painsbrook Way Open Space Harold Hill	
190	Park Lane Recreation Ground	
191	Parklands	
192	Priory Road Open Space	
193	Priory Road opposite Priory Path	
194	Priory Path	
195	Queens Theatre	
196	Rainham Recreation Ground	
197	Raphael Park	
198	Rise Park	
199	Rise Park Boulevard	
200	Sheffield Drive open space	
201	Spring Farm Park	
202	Stratton Wood	
203	St Andrews Park	
204	St Neots - Barnsley Road	
205	Sunflower Way flood lagoon	
206	Open Space Jarvis Way	
207	St Neots Open Area adj to Penzance Road	
208	St Neots play site	
209	Suttons Parkway	
210	The Dell, Hornchurch	
211	The Glens Elm Park	
212	The Glens, Rainham	
213	Tyle Green	
214	Tylers Common	
215	Upminster Hall Playing Field	
216	Upminster Park	
217	Westlands	
218	Whitchurch Road	
219	White Hart Lane/Cross Road	
220	Whybridge Close open space	
221	Wincanton Road open space/ Tees Drive	
222	Windmill Field	
223	Kings Lynn Drive/ Dartfields	
224	Dunstable Road	
225	o/s No. 132 Chatteris Ave	
226	Trowbridge Road	
227	Kingsbridge Circus	
228	Dewsbury Road/Farringdon Ave	
229	Halesworth Road/ Kettering Road	
230	Cambourne Ave opp. Halesworth Road	
231	Petersfield Ave/ Dagnam Park Drive	
232	Dagnam Park Drive / Sheffield Drive	
233	Dagnam Park Drive/Dagnam Park Square	
234	Dagnam Park Drive/ Dagnam Park Close	
235	Wingletye Lane between Upminster Road & Maywin Drive	
236	Between Hacton Lane & Kenley Gardens	
237	Between Hacton Lane & Clements Way	
238	Between Hacton Lane & Bevin Way	
239	Lilliput open space	
240	Jubilee Park , Old Church Road	
241	Queens Hospital vacant land site	
242	Hornchurch Country Park, Squadron Approach	
243	Ingrebourne Hill, Rainham Road	FORESTRY

244	Orange Tree Hill fields	
245	Rainham Creekside Path	
246	Stirling Close Open Space Rainham	
247	Rush Green Gardens Open Space	
248	Rainham Road opposite Thorogood Way	
249	Chadwick Drive open space, Harold Wood,	
250	Havering-atte-Bower Cricket Ground	
251	The Green, Wennington	
252	Duck Wood	
253	Tylers Wood	FORESTRY
254	Shoulder of Mutton Wood	
255	Hatters Wood	
256	Sage wood	
257	upminster cemetery	
258	rainham marshes	
259	Ingrebourne Valley North of A1306	
260	Whitchurch Road opp 118 - 158	
261	Federation Jewish Cemetery	
262	A12/Whitelands Way Bund, Whitelands Way, Romford	
263	Edenhall Road opp 24 & 28 Edenhall Road	
264	Kingsbridge Close	
265	Craven Gardens land adjacent to Lodge Lane	
266	Fairford Way / Petersfield Avenue	
267	Briscoe Road Verge, Kenway,	
268	Romford Library Gardens	
269	Crow Lane Cemetry	
270	St. Francis Hospice - Havering-Atte-Bower	
271	Harold Court Woods	FORESTRY
272	Pages Wood	FORESTRY
273	Berwick Glades	FORESTRY
274	Bonnetts Wood	FORESTRY
275	Thames Chase Forest Centre	FORESTRY
276	Folkes Lane Woodland	FORESTRY
277	Belhus Country Park	
278	Ockendon Road Grass Verge - adj Huntsman and Hounds	
279	Tern Gardens	

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Name of court High Court of Justice, QBD		Claim no.
Fee account no. (if applicable) PBA0079705	Help with Fees – Ref. no. (if applicable) H W F - [] [] - [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.) London Borough of Havering		
Defendant's name (including ref.) (1) WILLIAMS STOKES & 104 OTHER NAMED DEFENDANTS NAMED IN SCHEDULE 1 (106) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS WITHIN THE LONDON BOROUGH OF HAVERING		
Date		



QB-2019-002737

What is your name or, if you are a legal representative, the name of your firm?

2. Are you a Claimant Defendant Legal Representative
 Other (please specify)

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with?
 at a hearing without a hearing
 at a telephone hearing

6. How long do you think the hearing will last?
 Hours Minutes
 Is this time estimate agreed by all parties?
 Yes No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

9. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

[Empty box for service address]

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

Statement of Truth

(I believe) (The applicant believes) that the facts stated in this section (and any continuation sheets) are true.

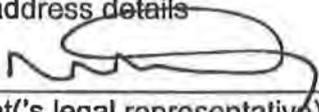
Signed _____ Dated _____
Applicant('s legal representative)('s litigation friend)

Full name _____

Name of applicant's legal representative's firm _____

Position or office held _____
(if signing on behalf of firm or company)

... Signature and address details

Signed  Dated: 31/7/19
Applicant('s legal representative)

Position or office held: **INDEPENDENT PRINCIPAL LAWYER**
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

LONDON BOROUGH OF
HAWKING, LEGAL
SERVICES, NEWHAM DOCKSIDE
1000 DOCKSIDE ROAD
Postcode **E16 2QY**

If applicable	
Phone no.	
Fax no.	
DX no.	
Ref no.	

E-mail address _____

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

SCHEDULE 1 – LIST OF DEFENDANTS

- 2) Craig Reece
- 3) Mohammed Nadeer
- 4) Brian Stokes
- 5) Michael Doherty
- 6) Mr J Cassidy
- 7) John Smith
- 8) Jonathan Ashton
- 9) James Robert Manning
- 10) Gary Ward
- 11) Abigail Eldridge
- 12) Patrick Doran
- 13) Marshall Tattam
- 14) Marshall William Tattam
- 15) James Allen
- 16) Patrick Stokes
- 17) Patrick Stokes (2)
- 18) Martin McDonagh
- 19) Mathew McGrory
- 20) Thomas Stokes
- 21) Tom Seokes
- 22) Russell Francis Stanley
- 23) Roberto Silva
- 24) Charley Delaney
- 25) Patrick Anthony McDonagh
- 26) Patrick McDonagh

- 27) Michael Lawrence
- 28) Edward McDonagh
- 29) Thurston Bros
- 30) John Walter Thurston
- 31) Lawrence Connors
- 32) William Stokes (2)
- 33) Gerry Connors
- 34) Guy Lidbetter
- 35) Lorna Upton
- 36) Andrew Gray
- 37) Joan Conner
- 38) Mark Fitzgerald
- 39) Anthony James
- 40) Celine Power
- 41) John Doran
- 42) Arthur Connors
- 43) Christopher Stokes
- 44) Patrick Stowes
- 45) John Stokes
- 46) John Paul Nevin
- 47) Alan George Baker
- 48) Micheal Price
- 49) Tom Donovan
- 50) John Reilly
- 51) Kathleen Stokes
- 52) Kathleen Stokes (2)
- 53) Christopher Lawson
- 54) Eddie Lawrence
- 55) Alexis Maughan
- 56) Ellen Stokes
- 57) Stephen Stokes
- 58) Michael McDonagh
- 59) Maurice Taggart
- 60) Dean Montgomery
- 61) Jason Barton
- 62) Christopher Lawrence
- 63) Brian Alan Clark
- 64) Ben Warbles
- 65) Winnie Maughan
- 66) Kevin Maughan
- 67) Ann Nevin
- 68) Jaye Price
- 69) Hope Price
- 70) Harry Mochan
- 71) Thomas Machan
- 72) Rosemary Arrowsmith
- 73) Bobby McDonald
- 74) Joseph Stewart

- 75) Elizabeth Stewart
- 76) Leanne Baggott
- 77) Tom Pyman
- 78) Joseph Jones
- 79) William Williams
- 80) Christine Williams
- 81) Joseph Williams
- 82) Charlene Jones
- 83) Tony Jones
- 84) Martin Bryant
- 85) Sharon Fraser
- 86) Westlay Williams
- 87) Luke Clee
- 88) Jordon Lee
- 89) John Lee
- 90) Samuel Evans
- 91) James Evans
- 92) Manrica Lee
- 93) Jim Obrien
- 94) Martin Hallissey
- 95) Tina O'Neill
- 96) Jake Lee
- 97) Anthony Price
- 98) Catherine McCann
- 99) Priscilla Garside
- 100) James Doran
- 101) Falex Doran
- 102) Marton Doran
- 103) Nickola Tomlinson
- 104) Ann Connors
- 105) Patrick Connors

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

SCHEDULE 2 - MAP

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

SCHEDULE 3 - LIST OF SITES

Schools

ID	Address	Ownership
1	Abbs Cross Academy and Arts College, Abbs Cross Lane, Hornchurch, RM12 4YB	Public
2	Ardleigh Green Infant School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
3	Ardleigh Green Junior School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
4	Benhurst Primary School, Benhurst Avenue, Hornchurch, RM12 4QS	Public
5	Bower Park Academy, Havering Road, Romford, RM1 4YY	Public
6	Brady Primary School, Wennington Road, Rainham, RM13 9XA	Public
7	Branfil Primary School, Cedar Avenue, Upminster, RM14 2LW	Public
8	Broadford Primary School, Faringdon Avenue, Romford, RM3 8JS	Public
9	Clockhouse Primary School, Clockhouse Lane, Romford, RM5 3QR	Public
10	Corbets Tey School, Harwood Hall Lane, Upminster, RM14 2YQ	Public
11	Crowlands Primary School, London Road, Romford, RM7 9NS	Public
12	Crownfield Infant School, White Hart Lane, Romford, RM7 8JB	Public
13	Crownfield Junior School, White Hart Lane, Romford, RM7 8JB	Public
14	Dame Tipping Church of England Primary School, North Road, Havering-Atte-Bower, Romford, RM4 1PS	Public
15	Drapers' Academy, Settle Road, Romford, RM3 9XR	Public
16	Drapers' Brookside Infant School, Dagnam Park Drive, Romford, RM3 9DJ	Public
17	Drapers' Brookside Junior School, Dagnam Park Drive, Romford, RM3 9DJ	Public
18	Drapers' Maylands Primary School, Settle Road, Romford, RM3 9XR	Public
19	Drapers' Pvrgo Priory Primary School, Settle Road, Romford, RM3 9RT	Public
20	Dycorts School, Settle Road, Romford, RM3 9YA	Public
21	Elm Park Primary School, South End Road, Hornchurch, RM12 5UA	Public
22	Emerson Park Academy, Wych Elm Road, Hornchurch, RM11 3AD	Public
23	Engayne Primary School, Severn Drive, Upminster, RM14 1SW	Public
24	Gaynes School, Brackendale Gardens, Upminster, RM14 3UX	Public
25	Gidea Park College, Balgores Lane, Romford, RM2 5JR	Public
26	Gidea Park Primary School, Lodge Avenue, Romford, RM2 5AJ	Public
27	Goodrington School, Walden Road, Hornchurch, RM11 2JT	Public
28	Hacton Primary School, Chepstow Avenue, Hornchurch, RM12 6AU	Public
29	Hall Mead School, Marlborough Gardens, Upminster, RM14 1SF	Public
30	Harold Court Primary School, Church Road, Romford, RM3 0SH	Public
31	Harold Wood Primary School, Recreation Avenue, Romford, RM3 0TH	Public
32	Harrow Lodge Primary School, Rainsford Way, Hornchurch, RM12 4BP	Public
33	Hilldene Primary School, Straight Road, Romford, RM3 7DT	Public
34	Hylands Primary School, Granger Way, Romford, RM1 2RU	Public
35	Immanuel School, Havering Road, Romford, RM1 4HR	Public
36	La Salette Catholic Primary School, Rainham Road, Rainham, RM13 8SR	Public
37	Langtons Infant School, Westland Avenue, Hornchurch, RM11 3SD	Public
38	Langtons Junior Academy, Westland Avenue, Hornchurch, RM11 3SD	Public
39	Marshall's Park Academy, Pettits Lane, Romford, RM1 4EH	Public
40	Mead Primary School, Amersham Road, Romford, RM3 9JD	Public
41	Nelmes Primary School, Wingletye Lane, RM11 3BX	Public
42	Newtons Primary School, Lowen Road, Rainham, RM13 8QR	Public
43	Oakfields Montessori School, Harwood Hall Lane, Upminster, RM14 2YG	Public
44	Oasis Academy: Pinewood, Thistledene Avenue, Romford, RM5 2TX	Public
45	Parklands Infant School, Havering Road, Romford, RM1 4QX	Public
46	Parklands Junior School, Havering Road, Romford, RM1 4QX	Public
47	Parsonage Farm Primary School, Farm Road, Rainham, RM13 9JU	Public
48	R J Mitchell Primary School, Tangmere Crescent, Hornchurch, RM12 5PP	Public
49	Raphael Independent School, Park Lane, Hornchurch, RM11 1XY	Public
50	Ravensbourne School, Neave Crescent, Romford, RM3 8HN	Public
51	Redden Court School, Cotswold Road, Romford, RM3 0TS	Public
52	Rise Park Infant School, Annan Way, Romford, RM1 4UD	Public
53	Rise Park Junior School, Annan Way, Romford, RM1 4UD	Public
54	Sacred Heart of Mary Girls' School, St Marv's Lane, Upminster, RM14 2QR	Public
55	Sanders School, Suttons Lane, Hornchurch, RM12 6RT	Public
56	Scargill Infant School, Mungo Park Road, Rainham, RM13 7PL	Public
57	Scargill Junior School, Mungo Park Road, Rainham, RM13 7PL	Public
58	Scotts Primary School, Bonington Road, Hornchurch, RM12 5TD	Public

59	<u>Squirrels Heath Infant School, Salisbury Road, Romford, RM2 5TP</u>	Public
60	<u>Squirrels Heath Junior School, Salisbury Road, Romford, RM2 5TP</u>	Public
61	<u>St Alban's Catholic Primary School, Heron Flight Avenue, Hornchurch, RM12 5LN</u>	Public
62	<u>St Edward's Church of England School and Sixth Form College, London Road, Romford, RM7 9NX</u>	Public
63	<u>St Edward's Church of England Voluntary Aided Primary School, Havering Drive, Romford, RM1 4BT</u>	Public
64	<u>St Joseph's Catholic Primary School, St Mary's Lane, Upminster, RM14 2QB</u>	Public
65	<u>St Mary's Catholic Primary School, Hornchurch Road, Hornchurch, RM12 4TL</u>	Public
66	<u>St Mary's Hare Park Primary School, South Drive, Romford, RM2 6HH</u>	Public
67	<u>St Patrick's Catholic Primary School, Lowshoe Lane, Romford, RM5 2AP</u>	Public
68	<u>St Peter's Catholic Primary School, Dorset Avenue, Romford, RM1 4JA</u>	Public
69	<u>St Ursula's Catholic Infant School, Straight Road, Romford, RM3 7JS</u>	Public
70	<u>St Ursula's Catholic Junior School, Straight Road, Romford, RM3 7JS</u>	Public
71	<u>Suttons Primary School, Suttons Lane, Hornchurch, RM12 6RP</u>	Public
72	<u>The Albany School, Broadstone Road, Hornchurch, RM12 4AJ</u>	Public
73	<u>The Brittons Academy, Ford Lane, Rainham, RM13 7BB</u>	Public
74	<u>The Champion School, Wingletye Lane, Hornchurch, RM11 3BX</u>	Public
75	<u>The Coopers' Company and Coborn School, St Marys Lane, Upminster, RM14 3HS</u>	Public
76	<u>The Frances Bardsley Academy for Girls, Brentwood Road, Romford, RM1 2RR</u>	Public
77	<u>The Harris Academy (formerly Chafford School), Lambs Lane South, Rainham, RM13 9XD</u>	Public
78	<u>The James Oglethorpe Primary School, Ashvale Gardens, Upminster, RM14 3NB</u>	Public
79	<u>The Mawney Foundation School, Mawney Road, Romford, RM7 7HR</u>	Public
80	<u>The Royal Liberty School, Upper Brentwood Road, Romford, RM2 6HJ</u>	Public
81	<u>Towers Infant School, Osborne Road, Hornchurch, RM11 1HP</u>	Public
82	<u>Towers Junior School, Osborne Road, Hornchurch, RM11 1HP</u>	Public
83	<u>Upminster Infant School, St Marys Lane, Upminster, RM14 3BS</u>	Public
84	<u>Upminster Junior School, St Marys Lane, Upminster, RM14 3BS</u>	Public
85	<u>Whybridge Infant School, Ford Lane, Rainham, RM13 7AR</u>	Public
86	<u>Whybridge Junior School, Ford Lane, Rainham, RM13 7AR</u>	Public
87	<u>Rainham Village Primary School & Nursery, Upminster Road South, Rainham RM13 9AA</u>	Public
88	<u>Havering Technical College (Quarles Campus), Tring Gardens, Romford, RM3 9ES</u>	Public
89	<u>Havering College Rainham Campus, New Road, Rainham, RM13 8GP</u>	Public
90	<u>Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3SU</u>	Public
91	<u>Havering College of Further and Higher Education, Ardleigh Green Road, Hornchurch, RM11 2LL</u>	Public

Council Owned Car Parks

ID	Address	Ownership
92	Appleton Way Car Park, Hornchurch	Public
93	Angel Way Multi Storey Car Park, Romford	Public
94	Balgores Square Car Park, Romford	Public
95	Billet Lane Car Park, Hornchurch	Public
96	Cherry Tree Car Park, Rainham	Public
97	Como Street Car Park, Romford	Public
98	Dorrington Gardens Car Park, Hornchurch	Public
99	Elm Park Hotel Car Park, Elm Park	Public
100	Elm Park Library Car Park, Elm Park	Public
101	Fentiman Way Car Park, Hornchurch	Public
102	Front Lane Car Park, Upminster	Public
103	Hoppy Hall Car Park, Upminster	Public
104	Keswick Avenue Car Park, Hornchurch	Public
105	Old Church Rise Car Park, Romford	Public
106	Rex Close Car Park, Romford	Public
107	Slaney Road Car Park, Romford	Public
108	Town Hall 3/4, Romford	Public
109	Town Hall 1/2, Romford	Public
110	Viking Way Car Park, Rainham	Public
111	Wilson Close Car Park, Upminster	Public
112	Woodhall Crescent Car Park, Hornchurch	Public

ID	Address	Ownership
113	Abbey Lane Open Space	
114	Amersham Road	
115	Balgores Lane playing field	
116	Barham Close	
117	Bedfords Park	
118	Berwick Woods	
119	Bretons Outdoor Recreation Ground	
120	Briar Road	
121	Brittons Playing Field	
122	Brookway play area	
123	Broxhill Centre	
124	Central Park	
125	Chelmsford Avenue Playsite	
126	Chelmsford Avenue/ Galleywood Crescent	
127	Chudleigh Road open Space	
128	Clematis Close	
129	Clockhouse Gardens	
130	Collier Row link	
131	Collier Row Recreation Ground Pedestrian gate	
132	Cornflower Way open Space	
133	Coronation Gardens	
134	Cottons Park	
135	Cranham Brickfields Sunnycroft Gdns	
136	Dagnam Park	
137	Elliots Field	
138	Elm Close / Elm Road	
139	Farringdon Flood Lagoon	
140	Fielders Sports Ground	
141	Fleet Close play site	
142	Forest Row Centre	
143	Forest Row play site	
144	Gaynes Parkway	
145	Gidea Park Sports Ground	
146	Gooshay Drive/Gooshay Gardens	
147	Gooshay Drive next to A12/ Melksham Drive	
148	Gooshay Drive/St Neots Road and Harlesden Road	
149	Grenfell Park	
150	Hacton Parkway and Playsite	
151	Hall Lane Mini Golf	
152	Harold Wood Park	
153	Harrow Lodge Park	
154	Havering Country Park	
155	Havering Playing Field	
156	Havering Road opposite Moray Way	
157	Havering Village Green	
158	Havering Well Garden	
159	Haynes Park	
160	Hilldene Ave/Nth Hill Drive	
161	o/s 25 Nth Hill Drive	
162	o/s 45 Nth Hill Drive	
163	Nth Hill Drive/ Taunton Road	
164	Taunton Rd/Barnstable Rd	
165	180 Taunton Rd	
166	Taunton Rd/Noak Hill Rd	
167	Ashbourne Rd/Lewes Rd	
168	Ashbourne Road/ Aylsham Lane	
169	Ashbourne Road	
170	Hornchurch Stadium	
171	Hylands Park	
172	Jutsums Recreation Ground	
173	Keats Avenue playsite	
174	Kew Close	
175	King Georges Playing Field	
176	Langtons Gardens	
177	Lamson Road, Rainham Marshes Nature Reserve	

178	Lawns Park	
179	Lessa Playsite and Open Space	
180	Lodge Farm Park	
181	Louis Marchesi Playsite (Maybank)	
182	Mardyke Adventure Playground and Open Space	
183	Mrtyle Road	
184	Noak Hill Sports Ground	
185	North Hill Recreation Ground	
186	Nth Romford Community Centre	
187	Oldchurch Park	
188	Painsbrook Open Space Harold Wood	
189	Painsbrook Way Open Space Harold Hill	
190	Park Lane Recreation Ground	
191	Parklands	
192	Priory Road Open Space	
193	Priory Road opposite Priory Path	
194	Priory Path	
195	Queens Theatre	
196	Rainham Recreation Ground	
197	Raphael Park	
198	Rise Park	
199	Rise Park Boulevard	
200	Sheffield Drive open space	
201	Spring Farm Park	
202	Stratton Wood	
203	St Andrews Park	
204	St Neots - Barnsley Road	
205	Sunflower Way flood lagoon	
206	Open Space Jarvis Way	
207	St Neots Open Area adj to Penzance Road	
208	St Neots play site	
209	Suttons Parkway	
210	The Dell, Hornchurch	
211	The Glens Elm Park	
212	The Glens, Rainham	
213	Tyle Green	
214	Tylers Common	
215	Upminster Hall Playing Field	
216	Upminster Park	
217	Westlands	
218	Whitchurch Road	
219	White Harl Lane/Cross Road	
220	Whybridge Close open space	
221	Wincanton Road open space/ Tees Drive	
222	Windmill Field	
223	Kings Lynn Drive/ Dartfields	
224	Dunstable Road	
225	o/s No. 132 Chatteris Ave	
226	Trowbridge Road	
227	Kingsbridge Circus	
228	Dewsbury Road/Farringdon Ave	
229	Halesworth Road/ Kettering Road	
230	Cambourne Ave opp. Halesworth Road	
231	Petersfield Ave/ Dagnam Park Drive	
232	Dagnam Park Drive / Sheffield Drive	
233	Dagnam Park Drive/Dagnam Park Square	
234	Dagnam Park Drive/ Dagnam Park Close	
235	Wingletye Lane between Upminster Road & Maywin Drive	
236	Between Hacton Lane & Kenley Gardens	
237	Between Hacton Lane & Clements Way	
238	Between Hacton Lane & Bevin Way	
239	Lilliput open space	
240	Jubilee Park , Old Church Road	
241	Queens Hospital vacant land site	
242	Hornchurch Country Park, Squadron Approach	
243	Ingrebourne Hill, Rainham Road	FORESTRY

244	Orange Tree Hill fields	
245	Rainham Creekside Path	
246	Stirling Close Open Space Rainham	
247	Rush Green Gardens Open Space	
248	Rainham Road opposite Thorogood Way	
249	Chadwick Drive open space, Harold Wood,	
250	Havering-atte-Bower Cricket Ground	
251	The Green, Wennington	
252	Duck Wood	
253	Tylers Wood	FORESTRY
254	Shoulder of Mutton Wood	
255	Hatters Wood	
256	Sage wood	
257	upminster cemetery	
258	rainham marshes	
259	Ingrebourne Valley North of A1306	
260	Whitchurch Road opp 118 - 158	
261	Federation Jewish Cemetery	
262	A12/Whitelands Way Bund, Whitelands Way, Romford	
263	Edenhall Road opp 24 & 28 Edenhall Road	
264	Kingsbridge Close	
265	Craven Gardens land adjacent to Lodge Lane	
266	Fairford Way / Petersfield Avenue	
267	Briscoe Road Verge, Kenway,	
268	Romford Library Gardens	
269	Crow Lane Cemetery	
270	St. Francis Hospice - Havering-Atte-Bower	
271	Harold Court Woods	FORESTRY
272	Pages Wood	FORESTRY
273	Berwick Glades	FORESTRY
274	Bonnetts Wood	FORESTRY
275	Thames Chase Forest Centre	FORESTRY
276	Folkes Lane Woodland	FORESTRY
277	Belhus Country Park	
278	Ockendon Road Grass Verge - adj Huntsman and Hounds	
279	Tem Gardens	

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 & 104 OTHERS LISTED
IN SCHEDULE 1 OF THE CLAIM FORM
- (2) PERSONS UNKNOWN FORMING
UNAUTHORISED 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 forming unauthorised encampments 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 encampments 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 on the site 24 hours prior to the hearing date. In the majority of 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 can only be proceeded with if the travellers are still on the land at the date of the court hearing and even when obtained is only valid for a period of three months. Accordingly, the same sites are encamped on repeatedly. The Council is then put to the effort, time and expense of applying for separate section 78 Orders.

5. The sites on 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 gypsies and travellers, who have protected characteristics affording them protection from discrimination under The Equality Act 2010. This included advice on the impact on their human rights and the 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 these encampments are 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 choose 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 been having a disproportionate impact on the settled community, which have also been identified on the Map. Therefore, the Council also 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.

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

Claim Number:

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

-and-

- (1) [ENTER LEAD DEFENDANT'S NAME] &
[ENTER THE NUMBER OF NAMED
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

EXHIBIT JC1

IN THE HIGH COURT OF JUSTICE

Claim Number:

QUEEN'S BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972

AND S187B TOWN AND COUNTRY PLANNING ACT 1990

AND S1 ANTI-SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014

BETWEEN

THE LONDON BOROUGH OF HAVERING

Claimant

-and-

**(1) WILLIAMS STOKES & 104 OTHER NAMED DEFENDANTS NAMED IN
SCHEDULE 1**

**(106) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS
WITHIN THE LONDON BOROUGH OF HAVERING**

Defendants

ORDER

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

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

POWER OF ARREST

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

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

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

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

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

UPON HEARING COUNSEL FOR THE CLAIMANT AND [] FOR THE DEFENDANTS [IN PERSON]

AND UPON READING THE PAPERS AND HEARING THE APPLICATION FOR AN INTERIM INJUNCTION PENDING THE FINAL INJUNCTION HEARING

IT IS ORDERED THAT:

The First to One Hundred Fifth Defendants are forbidden from:

1. Setting up an encampment on any land within the London Borough of Havering unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the London Borough of Havering without written permission from the Local Planning Authority, or, planning permission granted by the Secretary of State or in accordance with statutory permitted development rights

3. Entering and/or occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia.
4. Bringing on to the Land or stationing on the Land any caravans/mobile homes other than when driving through the London Borough of Havering or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the land.
5. Deposit or cause to be deposited, controlled waste in or on the Land unless a waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.

The One Hundred-Sixth Defendants are forbidden from:

6. Setting up an encampment on any land identified on the attached map and list of sites without written permission from the local planning authority, or, planning permission granted by the Secretary of State or in accordance with statutory permitted development rights
7. From entering and/or occupying any part of the land identified on the attached map and list of sites for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia
8. From bringing onto the Land or stationing on the Land any caravans/mobile homes other than when driving through the London Borough of Havering or in compliance with the parking orders regulating the use of car parks or with express permission from the owners of the land.
9. Deposit or cause to be deposited, controlled waste in or on the Land unless an waste management license or environmental permit is in force and the deposit is in accordance with the license or permit.
10. There shall be a power of arrest attached to prohibitions 1-9 of this Order.

The Land in this order means:

11. For the First to One Hundred-Fifth Defendants, all land within the London Borough of Havering as appears within the marked blue outline on the attached map at Schedule 2 of this Order.
12. For the One Hundred-Sixth Defendants (persons unknown) all the land marked on the map at Schedule 2 of this Order and identified by the key to the map and numbered 1 to 279, further details of which are on the list at Schedule 3 of this Order.

13. Service of this Order shall be by affixing a copy of this Order in a transparent envelope, or laminated copy, in a prominent position on the land.
14. The defendants may each of them (or anyone notified of this Order) apply to the Court on 72 hours written notice to the Court and the Claimant to vary or discharge this Order (or so much as if it affects that person)
15. The costs of this matter be reserved.

GUIDANCE NOTES

EFFECT OF THIS ORDER

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

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

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

INTERPRETATION OF THIS ORDER

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

COMMUNICATIONS WITH THE COURT

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

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

SCHEDULE 1 – LIST OF DEFENDANTS

- 2) Craig Reece
- 3) Mohammed Nadeer
- 4) Brian Stokes
- 5) Michael Doherty
- 6) Mr J Cassidy
- 7) John Smith
- 8) Jonathan Ashton
- 9) James Robert Manning
- 10) Gary Ward
- 11) Abigail Eldridge
- 12) Patrick Doran
- 13) Marshall Tattam
- 14) Marshall William Tattam
- 15) James Allen
- 16) Patrick Stokes
- 17) Patrick Stokes (2)
- 18) Martin McDonagh
- 19) Mathew McGrory
- 20) Thomas Stokes
- 21) Tom Seokes
- 22) Russell Francis Stanley
- 23) Roberto Silva
- 24) Charley Delaney
- 25) Patrick Anthony McDonagh
- 26) Patrick McDonagh

- 27) Michael Lawrence
- 28) Edward McDonagh
- 29) Thurston Bros
- 30) John Walter Thurston
- 31) Lawrence Connors
- 32) William Stokes (2)
- 33) Gerry Connors
- 34) Guy Lidbetter
- 35) Lorna Upton
- 36) Andrew Gray
- 37) Joan Conner
- 38) Mark Fitzgerald
- 39) Anthony James
- 40) Celine Power
- 41) John Doran
- 42) Arthur Connors
- 43) Christopher Stokes
- 44) Patrick Stowes
- 45) John Stokes
- 46) John Paul Nevin
- 47) Alan George Baker
- 48) Micheal Price
- 49) Tom Donovan
- 50) John Reilly
- 51) Kathleen Stokes
- 52) Kathleen Stokes (2)
- 53) Christopher Lawson
- 54) Eddie Lawrence
- 55) Alexis Maughan
- 56) Ellen Stokes
- 57) Stephen Stokes
- 58) Michael McDonagh
- 59) Maurice Taggart
- 60) Dean Montgomery
- 61) Jason Barton
- 62) Christopher Lawrence
- 63) Brian Alan Clark
- 64) Ben Warbles
- 65) Winnie Maughan
- 66) Kevin Maughan
- 67) Ann Nevin
- 68) Jaye Price
- 69) Hope Price
- 70) Harry Mochan
- 71) Thomas Machan
- 72) Rosemary Arrowsmith
- 73) Bobby McDonald
- 74) Joseph Stewart

- 75) Elizabeth Stewart
- 76) Leanne Baggott
- 77) Tom Pyman
- 78) Joseph Jones
- 79) William Williams
- 80) Christine Williams
- 81) Joseph Williams
- 82) Charlene Jones
- 83) Tony Jones
- 84) Martin Bryant
- 85) Sharon Fraser
- 86) Westlay Williams
- 87) Luke Clee
- 88) Jordon Lee
- 89) John Lee
- 90) Samuel Evans
- 91) James Evans
- 92) Manrica Lee
- 93) Jim Obrien
- 94) Martin Hallissey
- 95) Tina O'Neill
- 96) Jake Lee
- 97) Anthony Price
- 98) Catherine McCann
- 99) Priscilla Garside
- 100) James Doran
- 101) Falex Doran
- 102) Marton Doran
- 103) Nickola Tomlinson
- 104) Ann Connors
- 105) Patrick Connors

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

BETWEEN

LONDON BOROUGH OF HAVERING

CLAIMANT

AND

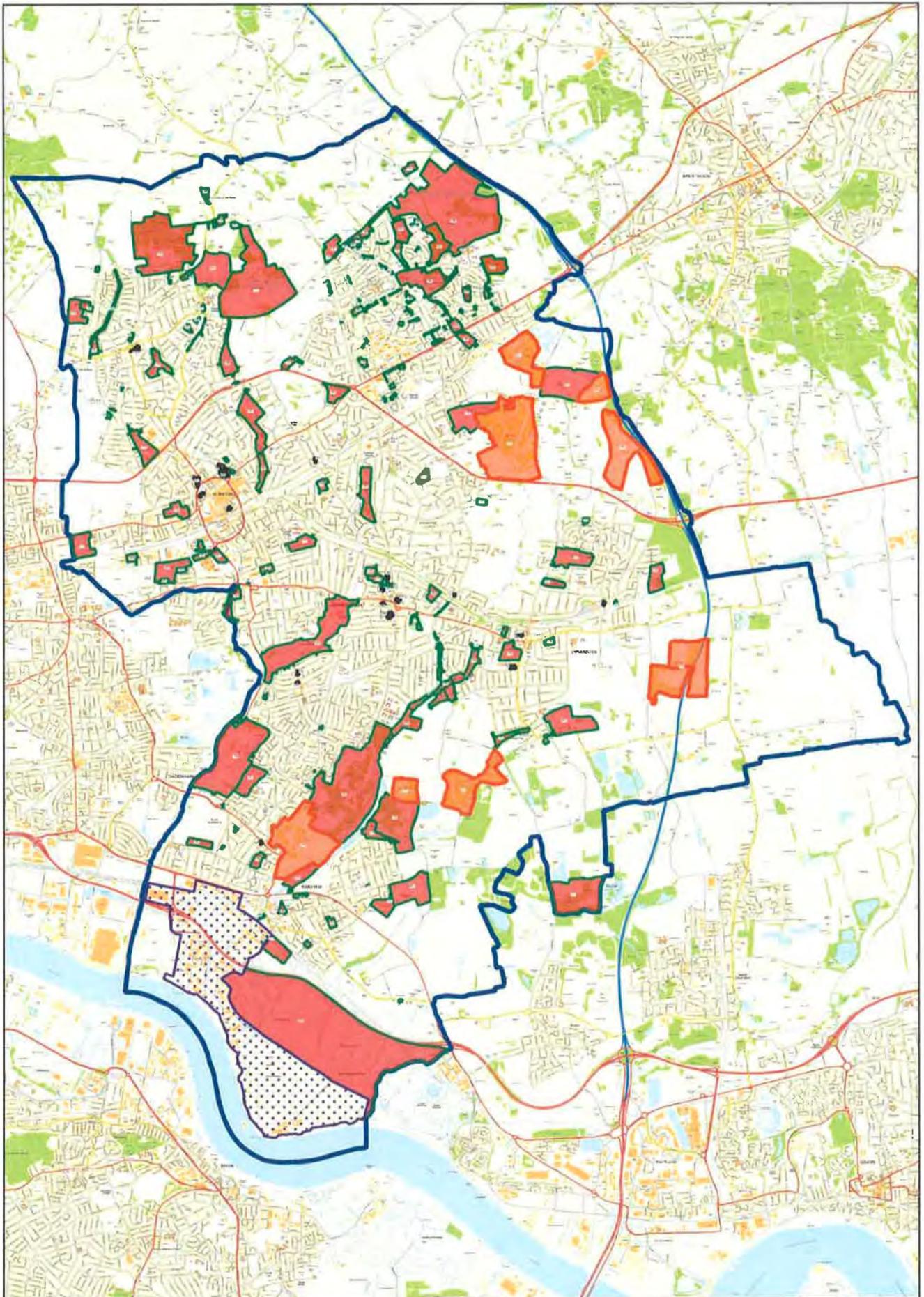
(1) WILLIAM STOKES AND 104 OTHER DEFENDANTS NAMED IN SCHEDULE 1

AND

(106) PERSONS UNKNOWN

DEFENDANTS

SCHEDULE 2 – MAP



Schools

ID	Address	Ownership
1	Abbs Cross Academy and Arts College, Abbs Cross Lane, Hornchurch, RM12 4YB	Public
2	Ardleigh Green Infant School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
3	Ardleigh Green Junior School, Ardleigh Green Road, Hornchurch, RM11 2SP	Public
4	Benhurst Primary School, Benhurst Avenue, Hornchurch, RM12 4QS	Public
5	Bower Park Academy, Havering Road, Romford, RM1 4YY	Public
6	Brady Primary School, Wennington Road, Rainham, RM13 9XA	Public
7	Branfil Primary School, Cedar Avenue, Upminster, RM14 2LW	Public
8	Broadford Primary School, Faringdon Avenue, Romford, RM3 8JS	Public
9	Clockhouse Primary School, Clockhouse Lane, Romford, RM5 3QR	Public
10	Corbets Tey School, Harwood Hall Lane, Upminster, RM14 2YQ	Public
11	Crowlands Primary School, London Road, Romford, RM7 9NS	Public
12	Crownfield Infant School, White Hart Lane, Romford, RM7 8JB	Public
13	Crownfield Junior School, White Hart Lane, Romford, RM7 8JB	Public
14	Dame Tipping Church of England Primary School, North Road, Havering-Atte-Bower, Romford, RM4 1PS	Public
15	Drapers' Academy, Settle Road, Romford, RM3 9XR	Public
16	Drapers' Brookside Infant School, Dagnam Park Drive, Romford, RM3 9DJ	Public
17	Drapers' Brookside Junior School, Dagnam Park Drive, Romford, RM3 9DJ	Public
18	Drapers' Maylands Primary School, Settle Road, Romford, RM3 9XR	Public
19	Drapers Pvrgo Priory Primary School, Settle Road, Romford, RM3 9RT	Public
20	Dycorts School, Settle Road, Romford, RM3 9YA	Public
21	Elm Park Primary School, South End Road, Hornchurch, RM12 5UA	Public
22	Emerson Park Academy, Wych Elm Road, Hornchurch, RM11 3AD	Public
23	Engayne Primary School, Severn Drive, Upminster, RM14 1SW	Public
24	Gaynes School, Brackendale Gardens, Upminster, RM14 3UX	Public
25	Gidea Park College, Balgores Lane, Romford, RM2 5JR	Public
26	Gidea Park Primary School, Lodge Avenue, Romford, RM2 5AJ	Public
27	Goodrington School, Walden Road, Hornchurch, RM11 2JT	Public
28	Hacton Primary School, Chepstow Avenue, Hornchurch, RM12 6AU	Public
29	Hall Mead School, Marlborough Gardens, Upminster, RM14 1SF	Public
30	Harold Court Primary School, Church Road, Romford, RM3 0SH	Public
31	Harold Wood Primary School, Recreation Avenue, Romford, RM3 0TH	Public
32	Harrow Lodge Primary School, Rainsford Way, Hornchurch, RM12 4BP	Public
33	Hilldene Primary School, Straight Road, Romford, RM3 7DT	Public
34	Hylands Primary School, Granger Way, Romford, RM1 2RU	Public
35	Immanuel School, Havering Road, Romford, RM1 4HR	Public
36	La Salette Catholic Primary School, Rainham Road, Rainham, RM13 8SR	Public
37	Langtons Infant School, Westland Avenue, Hornchurch, RM11 3SD	Public
38	Langtons Junior Academy, Westland Avenue, Hornchurch, RM11 3SD	Public
39	Marshalls Park Academy, Pettits Lane, Romford, RM1 4EH	Public
40	Mead Primary School, Amersham Road, Romford, RM3 9JD	Public
41	Nelmes Primary School, Wingletye Lane, RM11 3BX	Public
42	Newtons Primary School, Lowen Road, Rainham, RM13 8QR	Public
43	Oakfields Montessori School, Harwood Hall Lane, Upminster, RM14 2YG	Public
44	Oasis Academy: Pinewood, Thistledene Avenue, Romford, RM5 2TX	Public
45	Parklands Infant School, Havering Road, Romford, RM1 4QX	Public
46	Parklands Junior School, Havering Road, Romford, RM1 4QX	Public
47	Parsonage Farm Primary School, Farm Road, Rainham, RM13 9JU	Public
48	R J Mitchell Primary School, Tangmere Crescent, Hornchurch, RM12 5PP	Public
49	Raphael Independent School, Park Lane, Hornchurch, RM11 1XY	Public
50	Ravensbourne School, Neave Crescent, Romford, RM3 8HN	Public
51	Redden Court School, Cotswold Road, Romford, RM3 0TS	Public
52	Rise Park Infant School, Annan Way, Romford, RM1 4UD	Public
53	Rise Park Junior School, Annan Way, Romford, RM1 4UD	Public
54	Sacred Heart of Mary Girls' School, St Marys Lane, Upminster, RM14 2QR	Public
55	Sanders School, Suttons Lane, Hornchurch, RM12 6RT	Public
56	Scargill Infant School, Mungo Park Road, Rainham, RM13 7PL	Public
57	Scargill Junior School, Mungo Park Road, Rainham, RM13 7PL	Public
58	Scotts Primary School, Bonington Road, Hornchurch, RM12 5TD	Public

59	Squirrels Heath Infant School, Salisbury Road, Romford, RM2 5TP	Public
60	Squirrels Heath Junior School, Salisbury Road, Romford, RM2 5TP	Public
61	St Alban's Catholic Primary School, Heron Flight Avenue, Hornchurch, RM12 5LN	Public
62	St Edward's Church of England School and Sixth Form College, London Road, Romford, RM7 9NX	Public
63	St Edward's Church of England Voluntary Aided Primary School, Havering Drive, Romford, RM1 4BT	Public
64	St Joseph's Catholic Primary School, St Mary's Lane, Upminster, RM14 2QB	Public
65	St Mary's Catholic Primary School, Hornchurch Road, Hornchurch, RM12 4TL	Public
66	St Mary's Hare Park Primary School, South Drive, Romford, RM2 6HH	Public
67	St Patrick's Catholic Primary School, Lowshoe Lane, Romford, RM5 2AP	Public
68	St Peter's Catholic Primary School, Dorset Avenue, Romford, RM1 4JA	Public
69	St Ursula's Catholic Infant School, Straight Road, Romford, RM3 7JS	Public
70	St Ursula's Catholic Junior School, Straight Road, Romford, RM3 7JS	Public
71	Suttons Primary School, Suttons Lane, Hornchurch, RM12 6RP	Public
72	The Albany School, Broadstone Road, Hornchurch, RM12 4AJ	Public
73	The Brittons Academy, Ford Lane, Rainham, RM13 7BB	Public
74	The Champion School, Wingletye Lane, Hornchurch, RM11 3BX	Public
75	The Coopers' Company and Coborn School, St Marys Lane, Upminster, RM14 3HS	Public
76	The Frances Bardsley Academy for Girls, Brentwood Road, Romford, RM1 2RR	Public
77	The Harris Academy (formerly Chafford School), Lambs Lane South, Rainham, RM13 9XD	Public
78	The James Oglethorpe Primary School, Ashvale Gardens, Upminster, RM14 3NB	Public
79	The Mawney Foundation School, Mawney Road, Romford, RM7 7HR	Public
80	The Royal Liberty School, Upper Brentwood Road, Romford, RM2 6HJ	Public
81	Towers Infant School, Osborne Road, Hornchurch, RM11 1HP	Public
82	Towers Junior School, Osborne Road, Hornchurch, RM11 1HP	Public
83	Upminster Infant School, St Marys Lane, Upminster, RM14 3BS	Public
84	Upminster Junior School, St Marys Lane, Upminster, RM14 3BS	Public
85	Whybridge Infant School, Ford Lane, Rainham, RM13 7AR	Public
86	Whybridge Junior School, Ford Lane, Rainham, RM13 7AR	Public
87	Rainham Village Primary School & Nursery, Upminster Road South, Rainham RM13 9AA	Public
88	Havering Technical College (Quarles Campus), Tring Gardens, Romford, RM3 9ES	Public
89	Havering College Rainham Campus, New Road, Rainham, RM13 8GP	Public
90	Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3SU	Public
91	Havering College of Further and Higher Education, Ardleigh Green Road, Hornchurch, RM11 2LL	Public

Council Owned Car Parks

ID	Address	Ownership
92	Appleton Way Car Park, Hornchurch	Public
93	Angel Way Multi Storey Car Park, Romford	Public
94	Balgores Square Car Park, Romford	Public
95	Billet Lane Car Park, Hornchurch	Public
96	Cherry Tree Car Park, Rainham	Public
97	Como Street Car Park, Romford	Public
98	Dorrington Gardens Car Park, Hornchurch	Public
99	Elm Park Hotel Car Park, Elm Park	Public
100	Elm Park Library Car Park, Elm Park	Public
101	Fentiman Way Car Park, Hornchurch	Public
102	Front Lane Car Park, Upminster	Public
103	Hoppy Hall Car Park, Upminster	Public
104	Keswick Avenue Car Park, Hornchurch	Public
105	Old Church Rise Car Park, Romford	Public
106	Rex Close Car Park, Romford	Public
107	Slaney Road Car Park, Romford	Public
108	Town Hall 3/4, Romford	Public
109	Town Hall 1/2, Romford	Public
110	Viking Way Car Park, Rainham	Public
111	Wilson Close Car Park, Upminster	Public
112	Woodhall Crescent Car Park, Hornchurch	Public

ID	Address	Ownership
113	Abbey Lane Open Space	
114	Amersham Road	
115	Balgores Lane playing field	
116	Barham Close	
117	Bedfords Park	
118	Berwick Woods	
119	Bretons Outdoor Recreation Ground	
120	Briar Road	
121	Brittons Playing Field	
122	Brookway play area	
123	Broxhill Centre	
124	Central Park	
125	Chelmsford Avenue Playsite	
126	Chelmsford Avenue/ Galleywood Crescent	
127	Chudleigh Road open Space	
128	Clematis Close	
129	Clockhouse Gardens	
130	Collier Row link	
131	Collier Row Recreation Ground Pedestrian gate	
132	Cornflower Way open Space	
133	Coronation Gardens	
134	Cottons Park	
135	Cranham Brickfields Sunnycroft Gdns	
136	Dagnam Park	
137	Elliots Field	
138	Elm Close / Elm Road	
139	Farringdon Flood Lagoon	
140	Fielders Sports Ground	
141	Fleet Close play site	
142	Forest Row Centre	
143	Forest Row play site	
144	Gaynes Parkway	
145	Gidea Park Sports Ground	
146	Gooshay Drive/Gooshay Gardens	
147	Gooshay Drive next to A12/ Melksham Drive	
148	Gooshay Drive/St Neots Road and Harlesden Road	
149	Grenfell Park	
150	Hacton Parkway and Playsite	
151	Hall Lane Mini Golf	
152	Harold Wood Park	
153	Harrow Lodge Park	
154	Havering Country Park	
155	Havering Playing Field	
156	Havering Road opposite Moray Way	
157	Havering Village Green	
158	Havering Well Garden	
159	Haynes Park	
160	Hilldene Ave/Nth Hill Drive	
161	o/s 25 Nth Hill Drive	
162	o/s 45 Nth Hill Drive	
163	Nth Hill Drive/ Taunton Road	
164	Taunton Rd/Barnstable Rd	
165	180 Taunton Rd	
166	Taunton Rd/Noak Hill Rd	
167	Ashbourne Rd/Lewes Rd	
168	Ashbourne Road/ Aylsham Lane	
169	Ashbourne Road	
170	Hornchurch Stadium	
171	Hylands Park	
172	Jutsums Recreation Ground	
173	Keats Avenue playsite	
174	Kew Close	
175	King Georges Playing Field	
176	Langtons Gardens	
177	Lamson Road, Rainham Marshes Nature Reserve	

178	Lawns Park	
179	Lessa Playsite and Open Space	
180	Lodge Farm Park	
181	Louis Marchesi Playsite (Maybank)	
182	Mardyke Adventure Playground and Open Space	
183	Mrtyle Road	
184	Noak Hill Sports Ground	
185	North Hill Recreation Ground	
186	Nth Romford Community Centre	
187	Oldchurch Park	
188	Painsbrook Open Space Harold Wood	
189	Painsbrook Way Open Space Harold Hill	
190	Park Lane Recreation Ground	
191	Parklands	
192	Priory Road Open Space	
193	Priory Road opposite Priory Path	
194	Priory Path	
195	Queens Theatre	
196	Rainham Recreation Ground	
197	Raphael Park	
198	Rise Park	
199	Rise Park Boulevard	
200	Sheffield Drive open space	
201	Spring Farm Park	
202	Stratton Wood	
203	St Andrews Park	
204	St Neots - Barnsley Road	
205	Sunflower Way flood lagoon	
206	Open Space Jarvis Way	
207	St Neots Open Area adj to Penzance Road	
208	St Neots play site	
209	Suttons Parkway	
210	The Dell, Hornchurch	
211	The Glens Elm Park	
212	The Glens, Rainham	
213	Tyle Green	
214	Tylers Common	
215	Upminster Hall Playing Field	
216	Upminster Park	
217	Westlands	
218	Whitchurch Road	
219	White Hart Lane/Cross Road	
220	Whybridge Close open space	
221	Wincanton Road open space/ Tees Drive	
222	Windmill Field	
223	Kings Lynn Drive/ Dartfields	
224	Dunstable Road	
225	o/s No. 132 Chatteris Ave	
226	Trowbridge Road	
227	Kingsbridge Circus	
228	Dewsbury Road/Farringdon Ave	
229	Halesworth Road/ Kettering Road	
230	Cambourne Ave opp. Halesworth Road	
231	Petersfield Ave/ Dagnam Park Drive	
232	Dagnam Park Drive / Sheffield Drive	
233	Dagnam Park Drive/Dagnam Park Square	
234	Dagnam Park Drive/ Dagnam Park Close	
235	Wingletye Lane between Upminster Road & Maywin Drive	
236	Between Hacton Lane & Kenley Gardens	
237	Between Hacton Lane & Clements Way	
238	Between Hacton Lane & Bevin Way	
239	Lilliput open space	
240	Jubilee Park , Old Church Road	
241	Queens Hospital vacant land site	
242	Hornchurch Country Park, Squadron Approach	
243	Ingrebourne Hill, Rainham Road	FORESTRY

244	Orange Tree Hill fields	
245	Rainham Creekside Path	
246	Stirling Close Open Space Rainham	
247	Rush Green Gardens Open Space	
248	Rainham Road opposite Thorogood Way	
249	Chadwick Drive open space, Harold Wood,	
250	Havering-atte-Bower Cricket Ground	
251	The Green, Wennington	
252	Duck Wood	
253	Tylers Wood	FORESTRY
254	Shoulder of Mutton Wood	
255	Hatters Wood	
256	Sage wood	
257	upminster cemetery	
258	rainham marshes	
259	Ingrebourne Valley North of A1306	
260	Whitchurch Road opp 118 - 158	
261	Federation Jewish Cemetery	
262	A12/Whitelands Way Bund, Whitelands Way, Romford	
263	Edenhall Road opp 24 & 28 Edenhall Road	
264	Kingsbridge Close	
265	Craven Gardens land adjacent to Lodge Lane	
266	Fairford Way / Petersfield Avenue	
267	Briscoe Road Verge, Kenway,	
268	Romford Library Gardens	
269	Crow Lane Cemetery	
270	St. Francis Hospice - Havering-Atte-Bower	
271	Harold Court Woods	FORESTRY
272	Pages Wood	FORESTRY
273	Berwick Glades	FORESTRY
274	Bonnetts Wood	FORESTRY
275	Thames Chase Forest Centre	FORESTRY
276	Folkes Lane Woodland	FORESTRY
277	Belhus Country Park	
278	Ockendon Road Grass Verge - adj Huntsman and Hounds	
279	Terri Gardens	