

Wit: Yvonne Feehan
For: Claimant
Date: 29/01/2025
No.: 4
Exhibits: YF12-25

IN THE HIGH COURT OF JUSTICE

Claim No. KB-2024- 003315

KING'S BENCH DIVISION

IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990

B E T W E E N:-

THE MAYOR AND BURGESSES OF THE LONDON BOROUGH
RICHMOND UPON THAMES

Claimant

-and-

- (1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT AND / OCCUPYING FOR RESIDENTIAL PURPOSES (including temporary accommodation) WITH OR WITHOUT VEHICLES AT ANY OF THE 8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON THE SCHEDULE ATTACHED TO THIS CLAIM

- (2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON THE SCHEDULE ATTACHED TO THIS CLAIM

Defendants

FOURTH WITNESS STATEMENT OF YVONNE
FEEHAN

I, YVONNE FEEHAN, Parks Service Manager for the London Borough of Richmond upon Thames, of Civic Centre, 44 York Street, Twickenham, London TW1 3BZ WILL SAY AS FOLLOWS:

1. I make this Statement on behalf of the Claimant, following the hearing before Mr Justice Freedman on 22 November 2024 (the “Hearing”).

Further Encampments

2. Since the completion of the Hearing and the making of the Order of Mr Justice Freedman dated 22 November 2024 (the “Order”), at the time of writing, there have been no further unlawful encampments, occupations or depositing of waste at the 8 specified Sites protected by the Order. However, as shown in Exhibit YF4, exhibited to my first Witness Statement, such activity has historically taken place between March and September each year, and so it is not unusual to have experienced no unlawful activity since the Hearing. Accordingly, the Council has not been required to take any enforcement action pursuant to the Order.
3. Nonetheless, the Council has no reason to believe that the risk of such unlawful activity has in any way diminished, and we expect that attempts to set up unauthorised encampments and deposit waste will start to be made as we enter the Spring and Summer, as has historically been the case.

Evidence of Title of 8 Specified Sites

4. Further to paragraph of the Order, the Council have been asked to prove evidence of title to Ham Lands, Ham Riverside Drive Open Space, Ham Riverside Pitches, Kew Green, Old Deer Park, Richmond Green, Ham Common and King George’s Field (the “Sites”).
 - a. Ham Lands
 - i. The Site known as Ham Lands comprises 8 separate registered titles, and 3 parcels of unregistered land. The Council is the freehold owner of titles TGL312538, TGL72972, TGL312600, SGL12116, TGL312606, TGL312632 and TGL312822. Title SY130858 vests with Surrey County Council but following the reorganisation of

- Greater London under the London Government Act 1963 (the “1963 Act”), the title falls within the London Borough of Richmond.
- ii. There are two unregistered parcels of land to the south of the Site (the “Parcels”). Upon review of a conveyance dated 14 April 1938 (the “Conveyance”) between Buckminster Estates and the Mayor, Aldermen and Burgesses of the Borough of Richmond (the “Borough of Richmond”), it would appear that the Parcels, referred to in the Conveyance and accompanying plan as the land coloured blue and land coloured orange, were transferred to the Borough of Richmond at some point prior to the Conveyance. By virtue of the 1963 Act, the Borough of Richmond came under the Council’s ownership and control.
 - iii. The third plot of unregistered land is a thin strip that runs broadly alongside the River Thames as it heads north and northeast, to the west of the Site (the “Unregistered Strip”). Upon review of an agreement dated 15 April 1902 (the “Agreement”), between the Earl of Dysant and the County Council of the Administrative County of Surrey (“Surrey”) it would appear that the Unregistered Strip, referenced in the Agreement and accompanying plan as the land coloured brown, and thereafter referred to as the Ham Riverside Land, would be transferred to Surrey’s ownership upon the passing of a Bill pending in Parliament. It would appear that the Bill referred to ended up becoming the Richmond, Petersham and Ham Open spaces Act 1902 (the “1902” Act). Section 7.1 of the 1902 Act states that the Ham Riverside Land shall vest with Surrey, as per the agreement set out in Part IV. Part IV of the 1902 Act appears to simply repeat the wording of the Agreement. Following the reorganisation of Greater London under the 1963 Act, the title now falls within the London Borough of Richmond.
 - iv. I refer to true copies of the 8 HM Land Registry Title Registers and Plans, the Conveyance and the Agreement marked Exhibit YF12.

b. Ham Riverside Drive Open Space

The Council is the freehold owner of the land known as Ham Riverside Drive Open Space, Title Number TGL312281. I refer to true copies of the HM Land Registry Title Register and Plan marked Exhibit YF13.

c. Ham Riverside Pitches

The Council is the freehold owner of the land known as Ham Riverside Pitches, Title Number TGL312526. I refer to true copies of the HM Land Registry Title Register and Plan marked Exhibit YF14.

d. Kew Green

Kew Green is owned by the Crown Estate, but management and control of the Site is conferred upon the Council pursuant to an agreement (the “Kew Green Agreement”) dated 23 June 1909, to maintain the Site as a public open space. Therefore, as and when unlawful activities such as the Order prevents occur on the Site, the Council is entitled to immediate possession. I refer to a true copy of the Kew Green Agreement marked Exhibit YF15.

e. Old Deer Park

The Site at Old Deer Park is split into two separate titles, encapsulating land to the north and south of Twickenham Road, the A316. Both parcels of lands are owned by the Crown Estate, but were leased to the Council on 05 April 2016, for a period of 25 years, ending on 04 April 2041. The leases are registered under The Title Numbers TGL453765 (land north of the A316) and TGL461174 (land south of the A316). I refer to true copies of the HM Land Registry Title Registers and a screenshots of the HM Land Registry Map Search, marked Exhibit YF16. As electronic copies are not available at HM Land Registry, I am informed and believe to be true, that the South London Legal Partnership (“SLLP”), solicitors for the Council, have requested paper

copies of the Title Plans. At the time of writing, they have yet to be delivered. However, the screenshots, taken from the HM Land Registry MapSearch, show what the Council believes to be the extent of the relevant titles.

f. Richmond Green

Richmond Green is owned by the Crown Estate, but management and control of the Site is conferred upon the Council pursuant to an agreement dated 23 June 1909 (the “Richmond Green Agreement”), to maintain the Site as a public open space. Therefore, as and when unlawful activities such as the Order prevents occur on the Site, the Council is entitled to immediate possession. I refer to a true copy of the Richmond Green Agreement marked Exhibit YF17.

g. Ham Common

The Council is the freehold owner of the land known as Ham Riverside Pitches, Title Number TGL290940. I refer to true copies of the HM Land Registry Title Register and Plan marked Exhibit YF18.

h. King George’s Field

The Council is the freehold owner of the land known as King George’s Field, Title Number TGL277214. I refer to true copies of the HM Land Registry Title Register and MapSearch Snapshot marked Exhibit YF19. As an electronic is not available at HM Land Registry, I am informed and believe to be true, that the SLLP have requested a paper copy of the Title Plan. At the time of writing, it has yet to be delivered. However, the MapSearch Snapshot, taken from the HM Land Registry website, shows what the Council believes to be the extent of the relevant title.

Service on the Specified Sites

5. In accordance with paragraph 4(a) of the Order, on 28 November 2024, I issued instructions to the Council's Parks Patrol Contractor ("Parkguard"), to effect service on the Order on each of the 8 specific sites:
 - a. Ham Lands
 - b. Ham Riverside Drive Open Space
 - c. Ham Riverside Pitches
 - d. Kew Green
 - e. Old Deer Park
 - f. Richmond Green
 - g. Ham Common; and
 - h. King's George Field

6. A total of 16 copies of the Order were provided to Parkguard in clear plastic envelopes. I am informed by Parkguard, and believe it to be true, that these envelopes were attached to the gates/entrances of each of the sites listed in paragraph 4 above on 01 December 2024. I now refer to a series of true copies of photographs provided by Parkguard, showing the envelopes at each of the Sites, marked Exhibit YF20.

Posting on the Council's Website

7. I also confirm that, in accordance with paragraph 4(b) of the Order, copies of the Order, the Claim Form, Application Notices, Witness Statements of Yvonne Feehan and Joanne Capper and associated exhibits, and Counsel's Skeleton Argument and Supplemental Skeleton Argument were made available on the Council's website on 10 January 2025 and can be seen at the following address:
https://www.richmond.gov.uk/services/parks_and_open_spaces/parks_improvements_and_conservation/latest_parks_updates.

Public Advertisement

8. In accordance with paragraph 4(c) of the Order, I also confirm that details of the Order and where to access the Claim Documents were published in the Richmond and Twickenham Times on Thursday 12 December 2024. A true copy of the advertisement is set out at Exhibit YF21.

Deposit at the Council's Offices

9. In accordance with paragraph 4(d) of the Order, I also confirm that a copy of the Order, the Claim Form, Application Notices, Witness Statements of Yvonne Feehan and Joanne Capper together with the associated exhibits, and Counsel's Skeleton Argument and Supplemental Skeleton Argument were deposited at the receipt of the Council's Offices at Civic Centre, 44 York Street, Twickenham, TW1 3BZ on 28 January 2025 for inspection upon request by members of the public. Unfortunately, an internal misunderstanding prevented the papers being left at reception at an earlier date, however they have been available for inspection upon request since the Hearing. I can confirm that there have been no requests at the Council's offices for inspection of the papers.

Undertaking to Serve the London Gypsy and Travellers Group and the Friends and Families Travellers Group

10. In accordance with the undertaking included in the Order, I am informed and believe to be true, that on 20 December 2024 the SLLP served the London Gypsy and Travellers Group and the Friends and Families Travellers Group with a full set of court papers by email to info@londongandt.org.uk and fft@gypsy-traveller.org. I refer to true copies of these emails at Exhibit YF22.

Welfare Considerations

11. Paragraph 10(e) of the Order asks that the Council provides further information as to how the welfare considerations of Travellers who may be affected by the terms of the Order, and any final order sought, including the interests of Travellers wishing to come into the Borough have been or will be dealt with.
12. The Council is in the process of drafting a guidance procedure for unauthorised encampments (the "Draft Guidance"), that sets out how it handles unauthorised encampments, including those that would breach the Order if established, and how it identifies and deals with welfare considerations of those presents. The Draft Guidance is currently awaiting sign off by the Council's senior management, however I can confirm that it simply reflects the way in which my team and I have been dealing with unauthorised encampments for a number of years, and accurately sets out the way in which the Council approaches and deals with the welfare of those present in such encampments. A true copy of the Draft Guidance is exhibited at Exhibit YF23.

13. Further to paragraph 2 of this statement, since the granting of the Order, there have been no further encampments in breach of the Order. However, as the Draft Guidance dictates at section 4, and has been common practice within my team, as soon as the Council becomes aware of an unauthorised encampment, which is usually by way of reports from the public or Council officers discovering them whilst conducting other duties, details are forwarded to the Council's Community Safety Team and/or the police. An officer from the Council's Community Safety Team will then be designated as the Lead Officer and will thereafter be responsible for coordinating any assessments of the encampments, including assessing the welfare of those present, amongst other tasks. I should note, that at present, whilst the Draft Guidance awaits sign off, details are passed to Parkguard, who fulfil the role envisaged for the Community Safety Team in the Draft Guidance.
14. The Lead Officer will arrange for enquiries to be made to ascertain whether any members of the encampment have any welfare concerns, and these enquiries are usually carried out by the Parkguard. If it is acceptable to members of the encampment, the Council will liaise with members of the encampment and complete a Traveller Welfare Form, which helps to log and highlight any potential welfare concerns. A true copy of the Traveller Welfare Form is exhibited at Exhibit YF24.
15. However, it is often the case that members of the encampment simply do not want to engage with the Council, making it difficult to complete the Traveller Welfare Form in full. Where that is the case, the Council will collect as much information as possible by way of visual inspections and conversations with those present in the encampment, that are willing to offer any information.
16. The outcome of the Council's welfare assessment then feeds into the Lead Officer's decision making regarding whether to proceed with starting the process of eviction. However, where the Council's welfare assessment identifies those with welfare concerns, such as heavily pregnant women, those with serious illnesses, the elderly or very young children, the Council is obliged to bring these to the attention of, and make referrals to, the appropriate agencies, such as social services, health services and the Council's housing department.

17. If, upon the establishment of an unauthorised camp, the Council is either alerted to a welfare concern or discovers it during their assessment, such as a member of the encampment requiring urgent medical treatment, or an imminent birth in a due pregnancy, the Council has previously, and will continue to consider on a case by case basis, whether to permit the encampment to remain for a short period of time before the eviction process is initiated. The eviction process does not begin until such time as the Council has carried out a welfare assessment and considered its findings and can therefore be confident that any eviction will not adversely affect any welfare concern that the Council is aware of.

18. Further to the Order of Mr Justice Freedman, dated 20 November 2024, my colleague Joanne Capper, the Council's Principal Policy and Information Planner, provided a witness statement dated 21 November 2024. Ms Capper's statement set out the Council's current position in relation to its policies dealing with Travellers, and in particular, its position on a negotiated stopping policy and transit sites. In summary, having reviewed the available evidence and research, it was the Council's considered opinion that there was no need for a negotiated stopping policy, or the creation of further traveller sites. However, Ms Capper set out that the Council was committed to keeping this general position under review, and indicated that a new Local Plan, that would again consider the Council's provision of accommodation for Travellers in light of an updated evidence base, was being reviewed by the Planning Inspectorate prior to publication. Ms Capper also indicated that the Council were awaiting the release of the Mayor of London's London-wide Gypsy and Travellers Accommodation Needs Assessment ("GTANA") and associated research, which would in turn then be reviewed by the Council at a strategic level, before any relevant policy amendments were considered.

19. In preparing this witness statement, I have taken the time to discuss the matter further with Ms Capper.

20. Ms Capper contacted the Mayor of London's office on 17 January 2025 for an update on the GTANA and associated research. The Mayor of London's office replied on 20 January 2025. Ms. Gordon, the Principal Strategic Planner referred to the previous research that was commissioned by the London Gypsies and Travellers and De Montfort University. She also referred to the London Gypsy Traveller work supporting local authorities. What she failed to advise upon was whether there was any update on the

Mayor's approach. I have proceeded on the basis that there is no update at the present moment in time. I refer to a true copy of this email at Exhibit YF25.

21. Upon review of the Mayor of London's website in relation to the evidence being gathered for the next London Plan, it appears that the GTANA is planned for release in Spring 2025.
22. Ms Capper also informed me that work on the Council's Local Plan remains ongoing, with consultation on the required modifications identified by the Planning Inspectorate due to start imminently.
23. In accordance with the Council's 2023 Research on Gypsies and Travellers, referred to in paragraph 8 of Ms Capper's statement, the updated Local Plan is due to reflect the position that all current Traveller accommodation needs can be met by the existing Traveller site in Hampton, and therefore no further sites, transit or permanent, are required at present.
24. As set out in paragraph 10 of Ms Capper's statement, the Council has already liaised further with the Planning Inspectorate regarding this position, by way of responding to the Inspectors' Matter and Issues and Questions on the matter. Although the details of all modification proposed by the Planning Inspectorate are not yet in the public domain, Ms Capper has confirmed to me that there are no modifications relating to the Council's position in this regard, and therefore it is assumed the new Local Plan will state the position as set out in paragraph 23 above.

Order of Master of Gidden

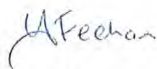
25. In accordance with paragraph 2 of the Order of Master Gidden, dated 24 January 2025, I am informed and believe to be true, that my colleague, Sasha O'Neill, placed a copy of Master Gidden's Order on the Council's website on 24 January 2025. This can be viewed at the following address:
https://www.richmond.gov.uk/services/parks_and_open_spaces/parks_improvements_and_conservation/latest_parks_updates.

Conclusion

26. In conclusion, the Council has complied with all relevant aspects of the Order in terms of service and notifying potentially interested parties.
27. Although since the making of the Order the Council is unaware of the establishment of any unauthorised camps, the Council fully believes that the risk of such camps being established remains high. History strongly suggests that unauthorised camps tend to appear in the Spring and Summer months and are largely absent during the Autumn and Winter. The Council has no reason to believe that this year will be any different, and therefore asks the Honourable Court to grant a final order in the terms sought.
28. The Council is aware of its obligations to consider the welfare needs of those that may be affected by the terms of any final order, and as and when unauthorised camps are established, it takes all reasonable steps to engage with members of the encampment to ascertain whether there are any welfare concerns. Any concerns raised are referred to the relevant authorities as required, and the Council bears them firmly in mind when deciding at what stage to proceed with eviction. Where welfare concerns require it to, the Council will continue to allow camps to remain for a short period while such concerns are addressed and dealt with.
29. Although its current policy position is that no further Traveller sites are required within the Borough, the Council also continues to review this position, and stands ready to consider and respond to any future guidance provided by the Mayor of London.

STATEMENT OF TRUTH

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



YVONNE FEEHAN

Dated this 29th day of January 2025

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF12

This is the exhibit marked "YF12" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number TGL312538

Edition date 12.08.2008

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- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (12.08.2008) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land at Ham Riverside, Richmond.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (12.08.2008) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre 44 York Street, Twickenham, Middx TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (12.08.2008) A Conveyance of the land in this title and other land dated 14 April 1938 made between (1) Buckminster Estates and (2) The Mayor Aldermen and Burgesses of the Borough of Richmond (Surrey) contains restrictive covenants.

NOTE:- Copy filed under TGL312526.

- 2 (12.08.2008) The land is subject to the rights reserved by the Conveyance dated 14 April 1938 referred to above

End of register

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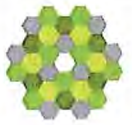
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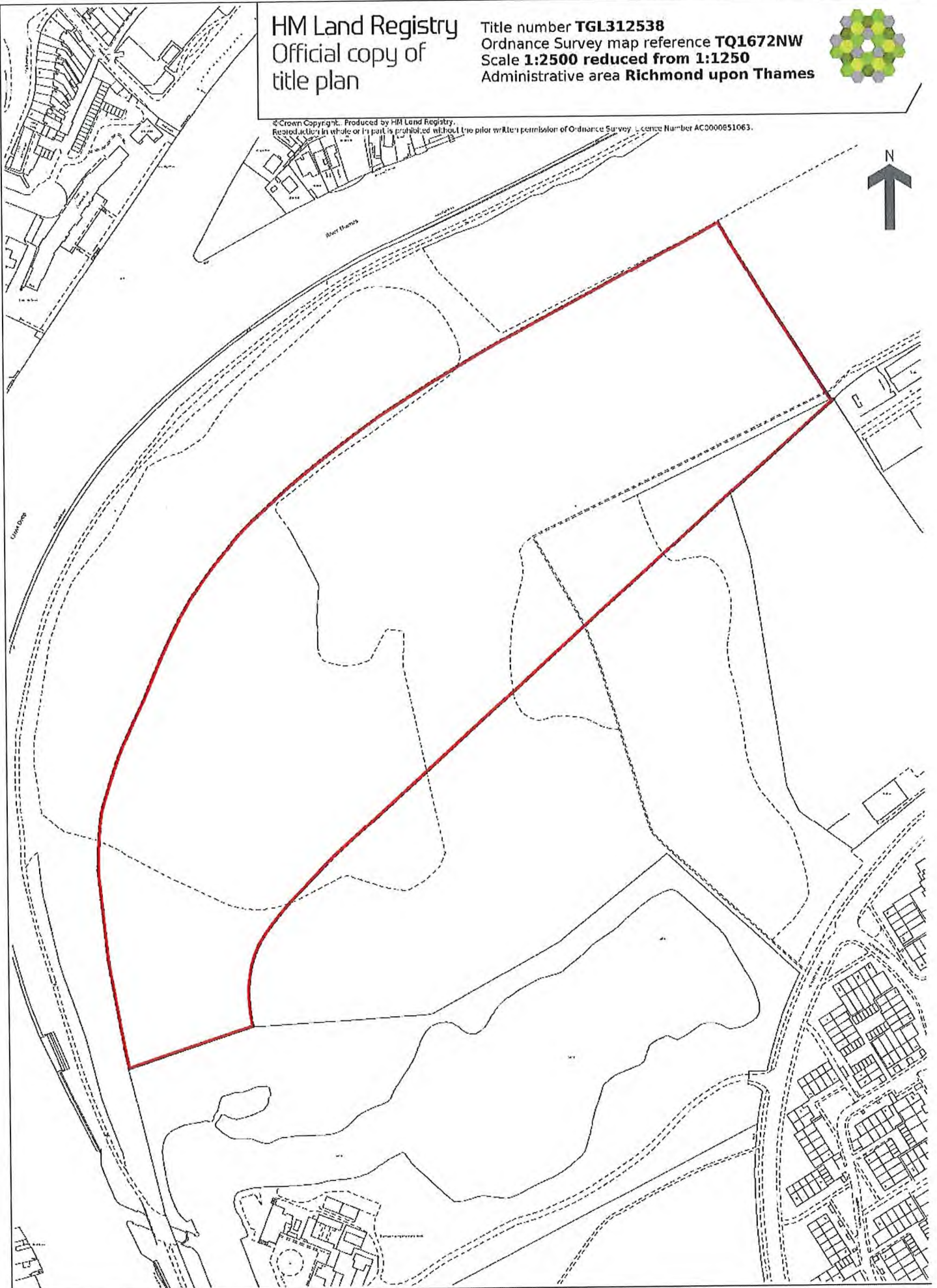
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HM Land Registry
Official copy of
title plan

Title number **TGL312538**
Ordnance Survey map reference **TQ1672NW**
Scale **1:2500 reduced from 1:1250**
Administrative area **Richmond upon Thames**



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Official copy of register of title

Title number TGL72972

Edition date 25.11.2009

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- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (05.03.1955) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Ham School Playing Fields Bungalow, Riverside Drive, Richmond (TW10 7RU).
- 2 (08.10.1992) The filed plan has been amended as to the Southern boundary.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (18.10.1995) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre, 44 York Street, Twickenham TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (18.10.1995) A Transfer of the land in this title dated 4 August 1995 made between (1) The Mayor and Burgesses of the Royal Borough of Kingston upon Thames (Transferor) and (2) The Mayor and Burgesses of the London Borough of Richmond upon Thames (Transferee) contains the following covenants:-

"The Transferee hereby covenants with the Transferor for itself and its successors in title to the property:-

3.1 Not to develop use or occupy the Property or any part or parts thereof or (whether by sale lease or otherwise) permit the development use or occupation of the Property or any part or parts thereof except for recreational and/or agricultural and/or horticultural purposes AND/or as public open space and for buildings wholly ancillary to any

C: Charges Register continued

of the foregoing uses and as a single private dwellinghouse in the occupation of one household only.

3.2 Not to do or allow to be done on the Property or on any part or parts thereof anything which may be or grow to be a nuisance or annoyance to the Council or their successors in title or the owners or occupiers of adjoining or neighbouring land.

AND IT IS HEREBY AGREED AND DECLARED that the provisions of Section 16 of the Greater London Council (General Powers) Act 1974 shall apply to the foregoing restrictions."

- 2 (20.05.1998) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.
The leases grant and reserve easements as therein mentioned.

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	20.05.1998 1	Ham Riverside School Playing Fields	26.02.1998 25 years from 1.8.1996	TGL146691
2	25.11.2009 1 (part of)	Ham Riverside School Playing Fields	17.11.2009 30 years from and including 17.11.2009	TGL326752

End of register

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H.M. LAND REGISTRY		TITLE NUMBER	
		TGL 72972	
ORDNANCE SURVEY PLAN REFERENCE	TQ 1672 NE	Scale 1/1250	
COUNTY GREATER LONDON	BOROUGH OF Richmond-upon-Thames	© Crown Copyright	



PLAN AMENDED

 PLANS BRANCH

FILED PLAN
 H.M. LAND

 REGISTRY

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Official copy of register of title

Title number SY130858

Edition date 26.07.2023

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- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (05.03.1955) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Ham Riverside School Playing Fields, Riverside Drive, Ham.
- 2 The land edged and lettered A in red on the filed plan added to the title on 8 August 1958.
- 3 The land edged and numbered in green on the filed plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.
- 4 (08.10.1992) The filed plan has been amended as to the southern boundary of the land removed to Title TGL72972.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (05.03.1955) PROPRIETOR: SURREY COUNTY COUNCIL of Woodhatch Place, 11 Cockshot Hill, Reigate RH2 8EF.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (17.03.2010) The land is subject to the rights granted by a Deed dated 9 March 2010 made between (1) Surrey County Council and (2) EDF Energy Networks (SPN) Plc.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed.

Title number SY130858

End of register

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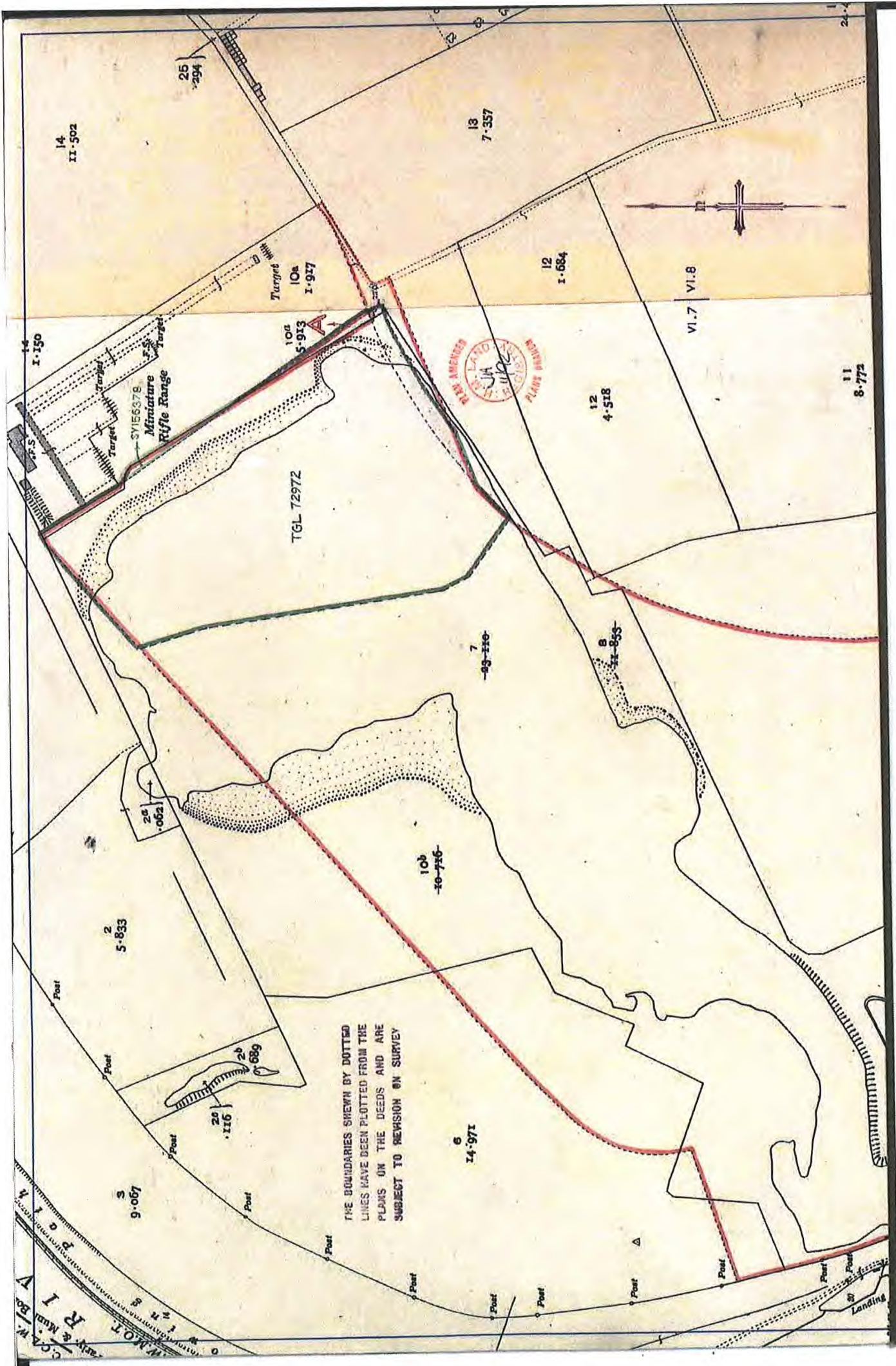
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THE BOUNDARIES SHOWN BY DOTTED
 LINES HAVE BEEN PLOTTED FROM THE
 PLANS ON THE DEEDS AND ARE
 SUBJECT TO REVISION ON SURVEY



H.M. LAND REGISTRY
Filed Plan of Title No. 8Y130858

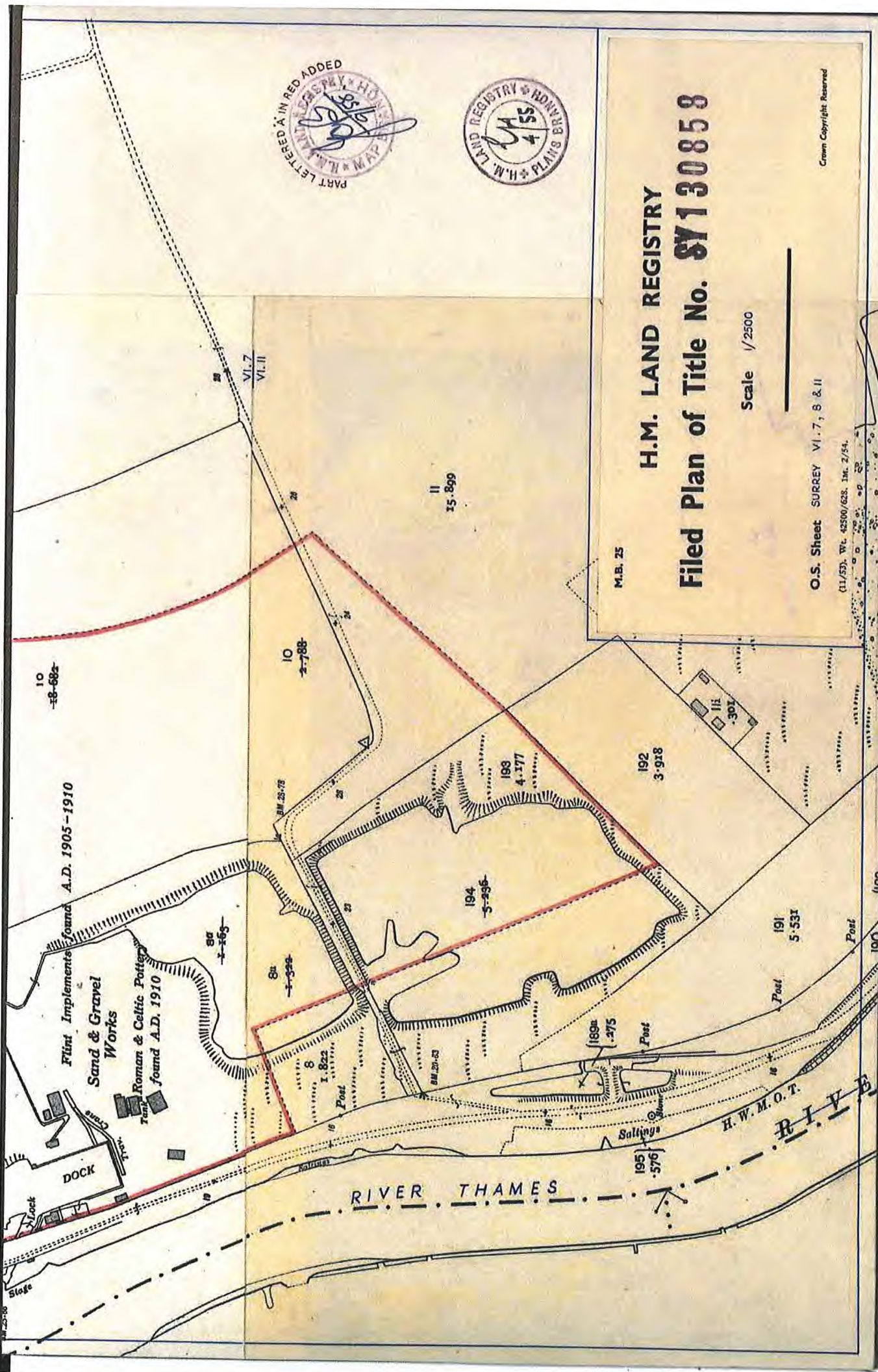
M.B. 25

Scale 1/2500

O.S. Sheet SURREY VI. 7, 8 & 11

(11/53). W.L. 42500/628. 1/4. 2/54.

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Official copy of register of title

Title number TGL312600

Edition date 13.08.2008

- This official copy shows the entries on the register of title on 10 JAN 2025 at 17:00:14.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (13.08.2008) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land at Ham Riverside, Richmond.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (13.08.2008) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre 44 York Street, Twickenham, Middx TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (13.08.2008) A Conveyance of the land in this title and other land dated 14 April 1938 made between (1) Buckminster Estates and (2) The Mayor Aldermen and Burgesses of the Borough of Richmond (Surrey) contains restrictive covenants.

NOTE: Copy filed under TGL312526.

- 2 (13.08.2008) The land is subject to the rights reserved by the Conveyance dated 14 April 1938 referred to above.

End of register

These are the notes referred to on the following official copy

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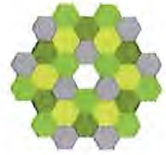
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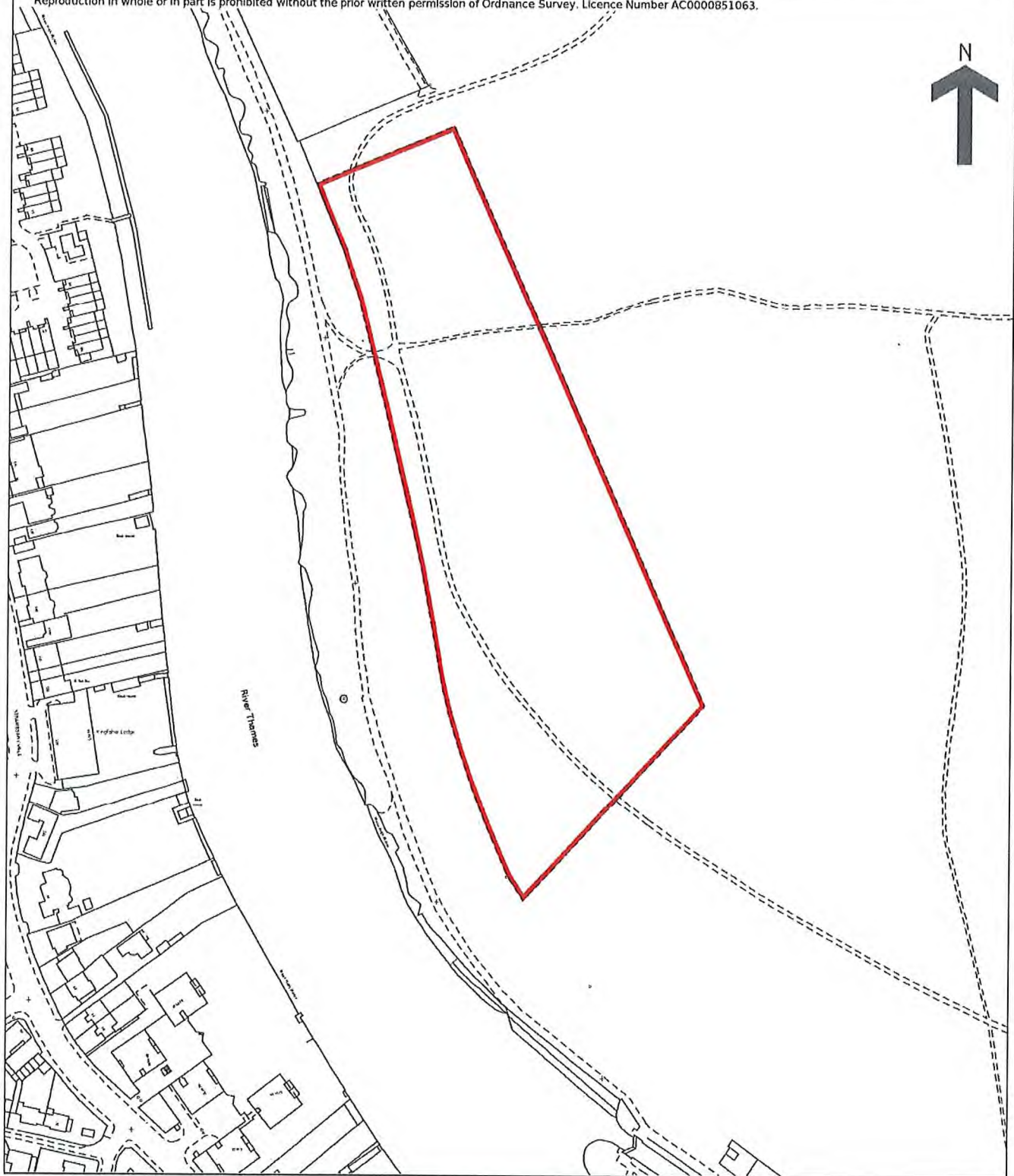
This title is dealt with by the HM Land Registry, Telford Office .

HM Land Registry
Official copy of
title plan

Title number **TGL312600**
Ordnance Survey map reference **TQ1672SW**
Scale **1:2500 reduced from 1:1250**
Administrative area **Richmond upon Thames**



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Official copy of register of title

Title number SGL12116

Edition date 25.10.2010

- This official copy shows the entries on the register of title on 10 JAN 2025 at 16:39:05.
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- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (23.07.1965) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land lying between Hardwicke Road, Ham and The River Thames.
- 2 The land edged and numbered in green on the filed plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.
- 3 The land has the benefit of the following rights reserved by the Transfer dated 6 May 1981 referred to in the Charges Register:-

"There shall be expressly excepted and reserved to the Council and their successors in title the owners and occupiers for the time being of the retained land and of every part thereof:

(1) full right and liberty for the Council to execute works and erections upon the retained land and to use the retained land and any buildings now or hereafter to be erected thereon in such manner as they may think fit notwithstanding that the access of light and air to the property may thereby be interfered with

(2) the right and support from the property for the retained land

(3) the right in fee simple to the full and free passage and running of water soil gas electricity telephones television and sound services in through and along the pipes drains sewers ducts cables and other conducting media ("the conduits") laid or which may be laid within a period of 80 years fro the date hereof in over under or across the property and which serve or are capable of serving the retained land

(4) full right and liberty in fee simple with all necessary workmen and appliances at all times to enter upon the property for the purposes of maintaining renewing repairing inspecting and cleansing the conduits and for carrying out any works to the retained land or any boundary and fences for which the Council are responsible the Council or other the person or persons exercising such rights causing as little damage as possible by the exercise of such rights and making good all damage caused thereby

(5) all easements quasi-easements liberties privileges rights and

A: Property Register continued

advantages now or heretofore occupied or enjoyed by the retained land over or in respect of the property and which would be implied by statute or by reason of severance in favour of a purchaser of the retained land if the same had been conveyed to such purchaser and the property were retained by the Council."

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (19.05.1957) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre, 44 York Street, Twickenham TW1 3BZ.
- 2 (19.05.1957) Except under an Order of the Registrar no disposition by the proprietor of the land is to be registered unless made in accordance with the Town and Country Planning Act 1962 or some other Act or authority.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 A Conveyance of the land in this title and other land dated 23 April 1929 made between (1) The Right Honourable Sir William John Manners Earl of Dysart (Vendor) (2) The Honourable Stanhope Tollemache and others and (3) Thames River Grit Company Limited (Purchaser) contains covenants details of which are set out in the schedule of restrictive covenants hereto.
- 2 Licence dated 3 March 1958 made between (1) Thames Grit & Aggregates Limited and (2) The County Council of The Administrative County of Surrey for a water pipe the approximate position of which is shown by the broken line marked waterpipe on the filed plan.

NOTE: Copy filed.

- 3 The land is subject to the following rights granted by a Transfer of the land edged and numbered SGL318754 in green on the filed plan dated 6 May 1981 made between (1) The Mayor and Burgesses of the London Borough of Richmond Upon Thames and (2) Ferndale Homes West Limited:-

"TOGETHER WITH the right of support for the property from the remaining land comprised in Title No.SGL12116 ("hereinafter called the retained land") TOGETHER ALSO with a right to construct renew repair and maintain across the land coloured green any road approved under Clause 1 of the Second Schedule hereto and to have the same adopted by the relevant Highway Authority the Transferee or other person exercising such rights causing as little damage as possible thereby and making good all damage so caused."

NOTE: The land coloured green referred to adjoins the northern boundary fronting Dukes Avenue

The following is a copy of Clause 1 of the Second Schedule referred to:

"At its own cost diligently to erect and complete or cause to be diligently erected and completed on the property fit for immediate use and occupation and in a substantial and workmanlike manner dwellinghouses garages (together with any other necessary outbuildings) play and landscaped areas (including boundary walls or fences and other works all of which are hereinafter called "the Development") in accordance with

(a) a planning brief dated June 1980 described "Ham Lands - five acre site adjacent to Beaufort Court, Private Housing" and

C: Charges Register continued

(b) layout plans sufficient specifications and a landscaping scheme (the said "approved plans") which shall have previously been approved by the Council in their capacity as Estate Owners and

(c) all necessary planning permission building regulations approval and other requisite consents therefor."

- 4 The land hatched blue on the filed plan is subject for the term of 60 years from 29 January 1982 to the rights granted by a Lease of easements dated 29 January 1982 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) The South Eastern Electricity Board., The Lease also contains restrictive covenants affecting the land within 1.5 metres of the said land hatched blue on the filed plan.

NOTE: Copy filed.

- 5 (25.10.2010) The land is subject to the rights granted by a Deed dated 20 October 2010 made between (1) The Mayor and Burgesses of the London Borough of Richmond upon Thames and (2) EDF Energy Networks (SPN) Plc.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed.

Schedule of restrictive covenants

- 1 The following are details of the covenants contained in the Conveyance dated 23 April 1929 referred to in the Charges Register:-

"THE Purchaser doth hereby grant unto the Vendor and his tenants and all other persons authorised by him the right of free access and passage to and from any part of the said estate of the Vendor over and along any roads and footpaths hereinafter constructed by the Purchaser on the hereditaments and premises hereby conveyed or constructed by the Purchaser on other lands of the Vendor and leading from the said hereditaments and premises hereby conveyed to or in the direction of Upper Ham Road such Right of access and passage to be over and along the said road or roads when constructed and either on foot on horseback and with or without horses carriages motor and other vehicles at all times and for all purposes.

THE Company shall not be entitled to any right of light or air which would restrict or interfere with the free use of any adjoining hereditaments belonging to the Vendor for building or other purposes and nothing contained in the foregoing restriction shall in any manner imply or be held to imply any obligation on the part of the Vendor or those claiming or to claim under him to impose any restrictions as to the use of any other of the lands of the Vendor in the neighbourhood of the hereditaments and premises hereby agreed to be sold it being the intention of the parties hereto that these provisions are for the benefit of the Vendor and those claiming under him shall not hamper or restrict him or them in dealing with their other property in any manner in which they may in their absolute discretion think fit.

THE Purchaser to the intent and so that the covenants hereinafter contained shall be binding on the hereditaments hereby conveyed into whosoever hands the same may come and to the further intent that the said covenant shall be for the benefit and protection of the Dysart (Surrey) Estate (of which the hereditaments hereby conveyed form part) and so far as practicable be enforceable by the owner or owners lessees or tenants from time to time of the said estate or any part thereof hereby covenants with the Vendor or the owner or owners for the time being of the said Dysart (Surrey) Estate that the Purchaser will at all times observe and perform the stipulations and conditions set out in the Third Schedule hereto.

THE THIRD SCHEDULE above referred to

1. The Company will within three months of the completion of the sale and purchase erect and maintain to the approval of the Vendor's

Schedule of restrictive covenants continued

Surveyor suitable posts or other indications showing the boundaries all round the lands edged blue on the said plan.

2. The Company shall retain the said land contracted to be purchased for the purpose of excavating ballast and sand therefrom and no building to be erected on the purchased hereditaments after the same shall have been excavated and refilled shall be less than five feet and all buildings to be used for the purpose of manufacture to be erected on the said piece or parcel of land shall be not less than 15 feet back from the respective boundaries and in accordance with block plans specifications plans and elevations to be previously submitted in duplicate to and approved in writing by the surveyor for the time being of the Vendor (whose reasonable fee for such approval shall be paid by the Company) one copy to be retained by the surveyor. No building other than private residences shall exceed 50 feet in height measured from the ground level to the ridge. Any temporary building to which the Vendor shall reasonably object shall forthwith be removed on notice by the Vendor to the Company.

3. No chimney shaft to be erected shall exceed 50 feet in height. All provisions of the Town Planning Acts affecting the hereditaments shall be complied with by the Company.

4. No part of the land or any building or erection for the time being thereon shall be used for the purpose of any advertisement whatsoever (except for notification of the business of the Company or of the occupiers for the time being from time to time of the said land) nor shall any building be converted for use as a hotel or tavern for the sale of beer wine spirits or other intoxicating liquors without the consent of the Vendor in writing first obtained such consent (if given) to be subject to such terms and conditions as the Vendor shall in his absolute discretion think fit but no such consent shall be required for nor shall anything herein contained be deemed to prevent the Company or its employees carrying on on the said premises a club or canteen for the use fo the Company its staff and employees and their guests wherein beer wine spirits or other intoxicating liquors may be sold in the usual and ordinary course of the carrying on of a private club or canteen.

5. No business of a noisy noxious or offensive character shall be or to be permitted to be carried on upon the said premises or any part thereof.

6. The building and other restrictions imposed upon the Company shall not be binding upon the Vendor or his successors or successors in title and he and they shall be entitled to vary or alter the same as regards any other property the sale of which may not have been already made or completed or otherwise to vary such restrictions but not so that any such other property may or can be sold expressly for use for any noisy noisome noxious or offensive manufacture trade or business.

7. When the Company shall have ceased excavation upon any portion of the purchased hereditaments it shall at its own expense (but not so as to prevent it from working any adjoining portion of such hereditaments) fill in such portion with brick rubbish clay mould loam or other material approved of by the Vendor or his agent and shall level such portion to such a height as will bring the level to that of the surrounding land after allowing for settlement but in no case to a less height than 25 feet above Ordnance Datum such refilling to proceed at a reasonable rate and the whole area to be completely refilled within five years after the excavations for the purposes of the Company's business are completed."

NOTE: The boundaries edged blue referred to so far as they coincide with those of the land in this title are lettered A.B.C.D.E and F on the filed plan.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

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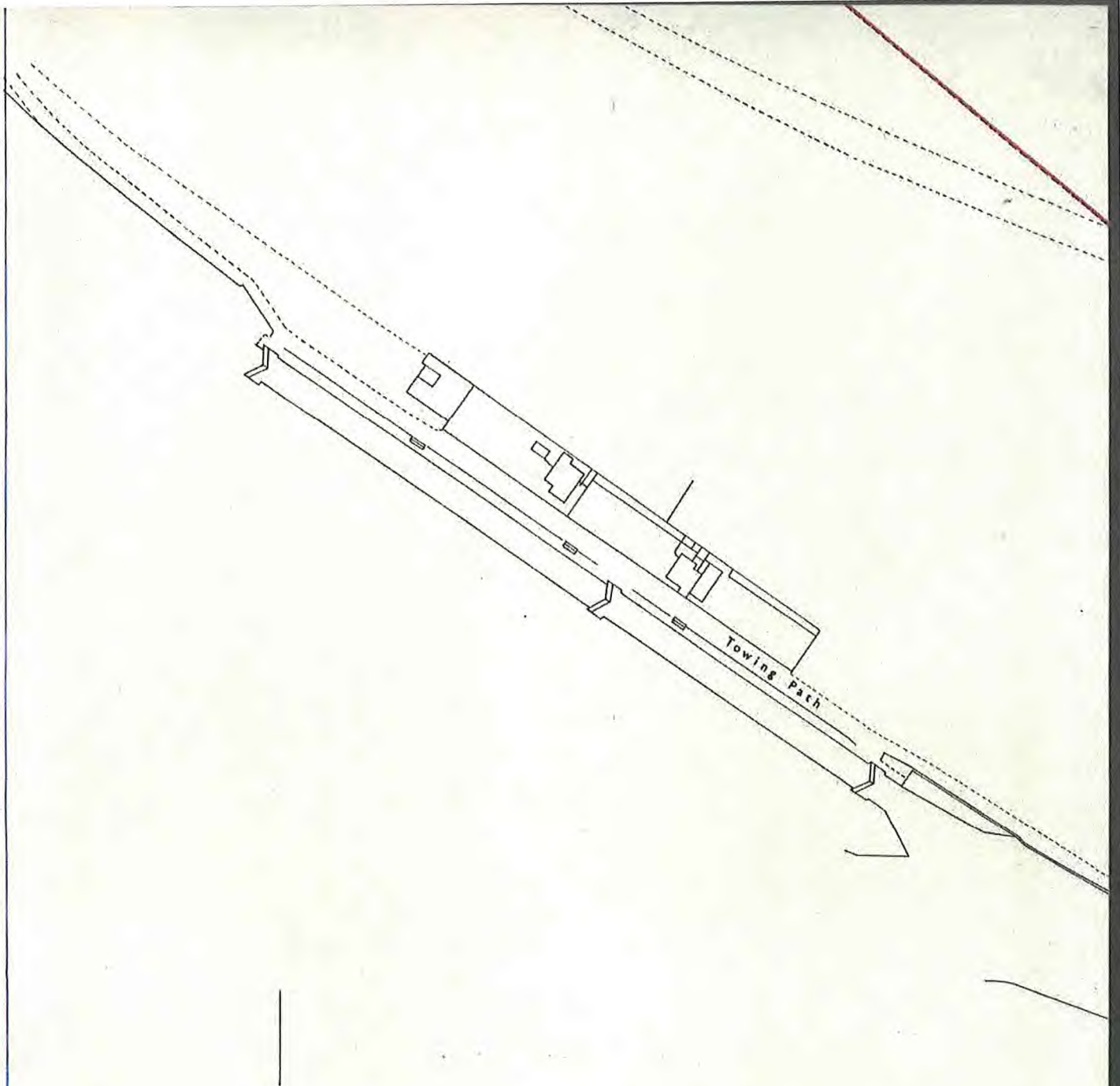
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TQ1671 NW

TQ1671 NE
TQ1671 SE

M.B. 25

H.M. LAND REGISTRY

Filed Plan of Title No. SGL 12116

Scale $\sqrt{1250}$

County— GREATER LONDON

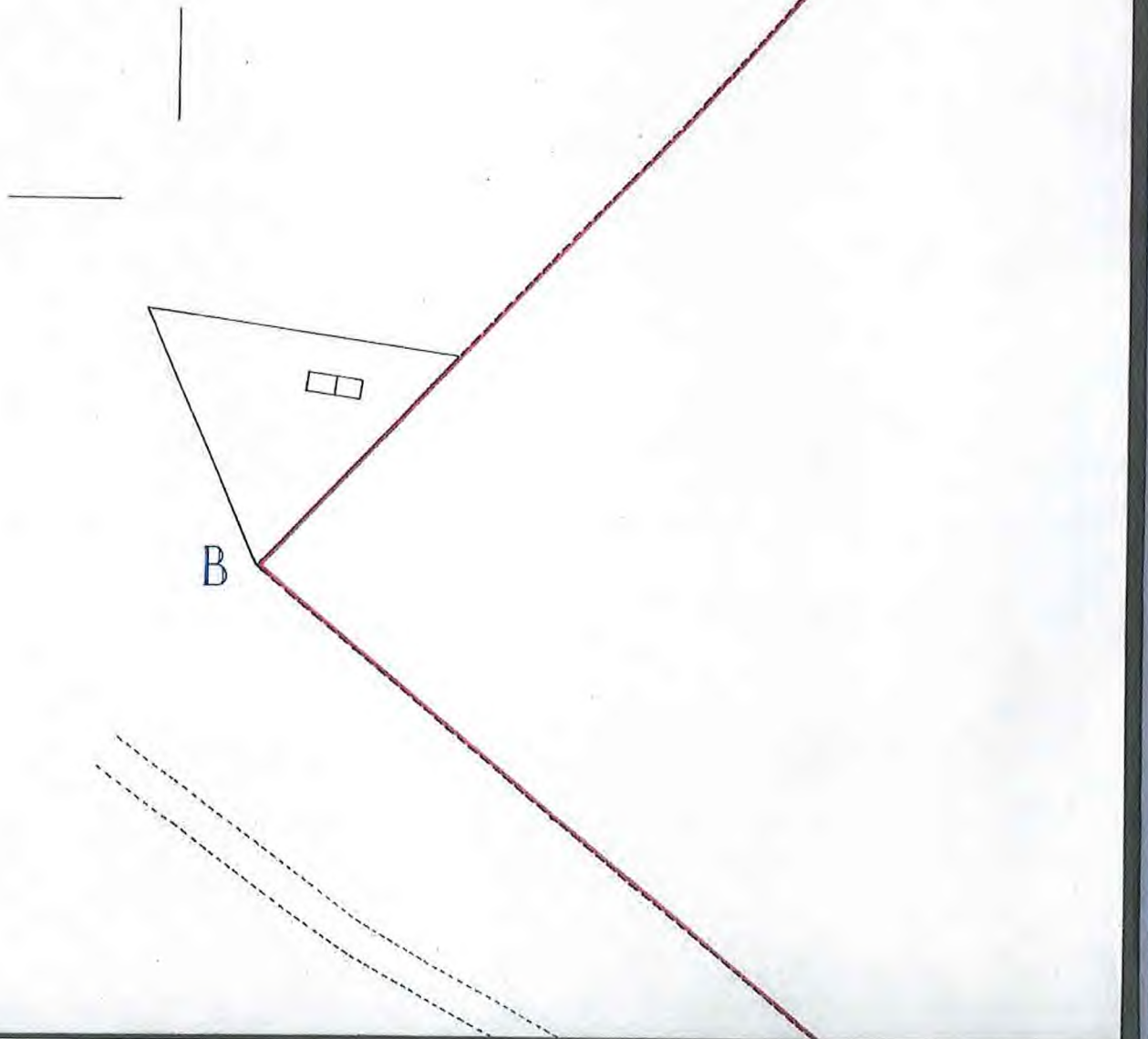
O.S. Sheet TQ 1671-NE, TQ 1672-SE & TQ 1771-NW

J. T. & SJS

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The boundaries shown by dotted lines have been plotted from the plans on the deeds and are subject to revision on survey after the erection of fences.

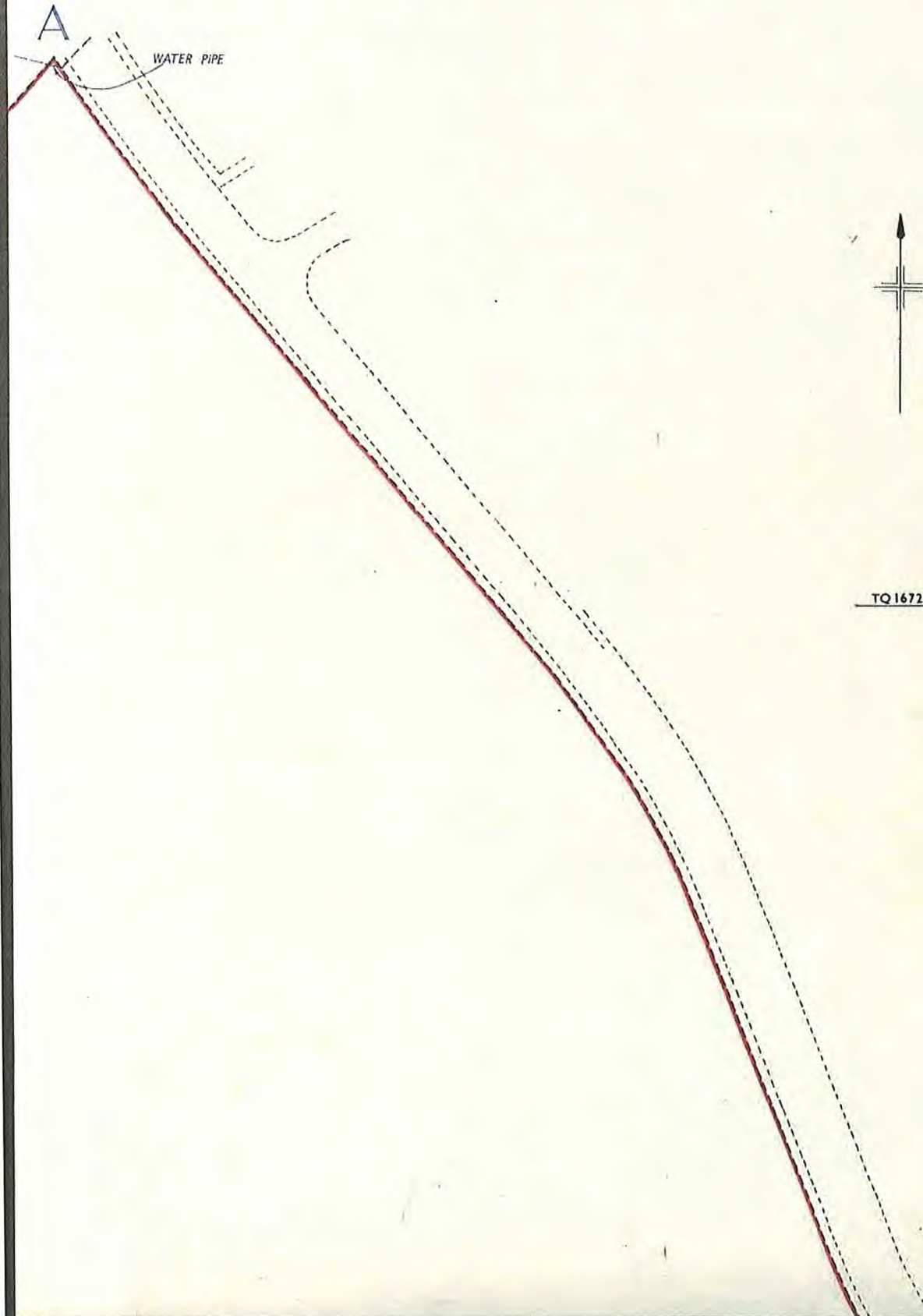


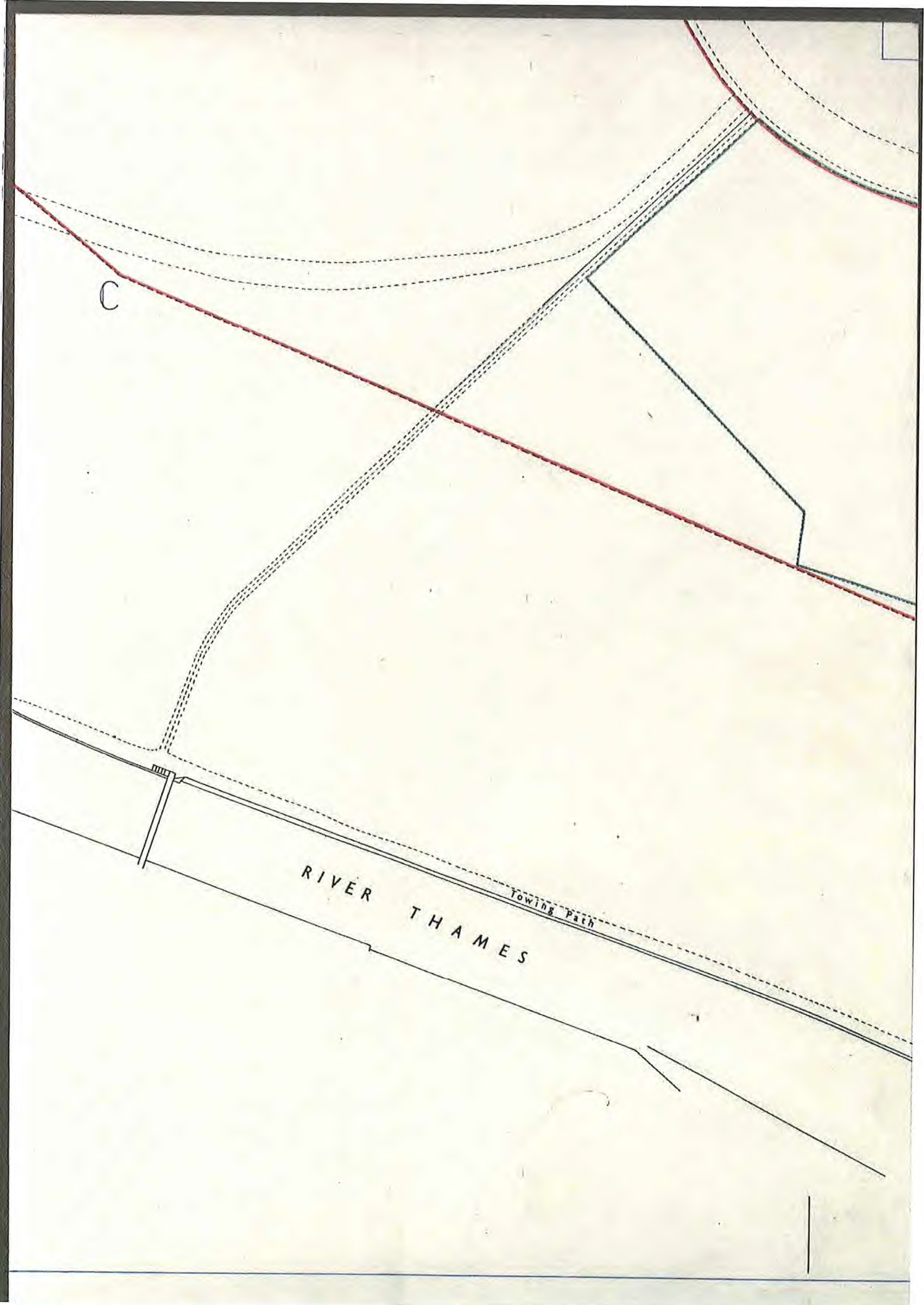
TIONAL GRID PLAN
ATER LONDON

TQ1671 NE

Scale 1/1250

BOROUGH OF RICHMOND UPON THAMES

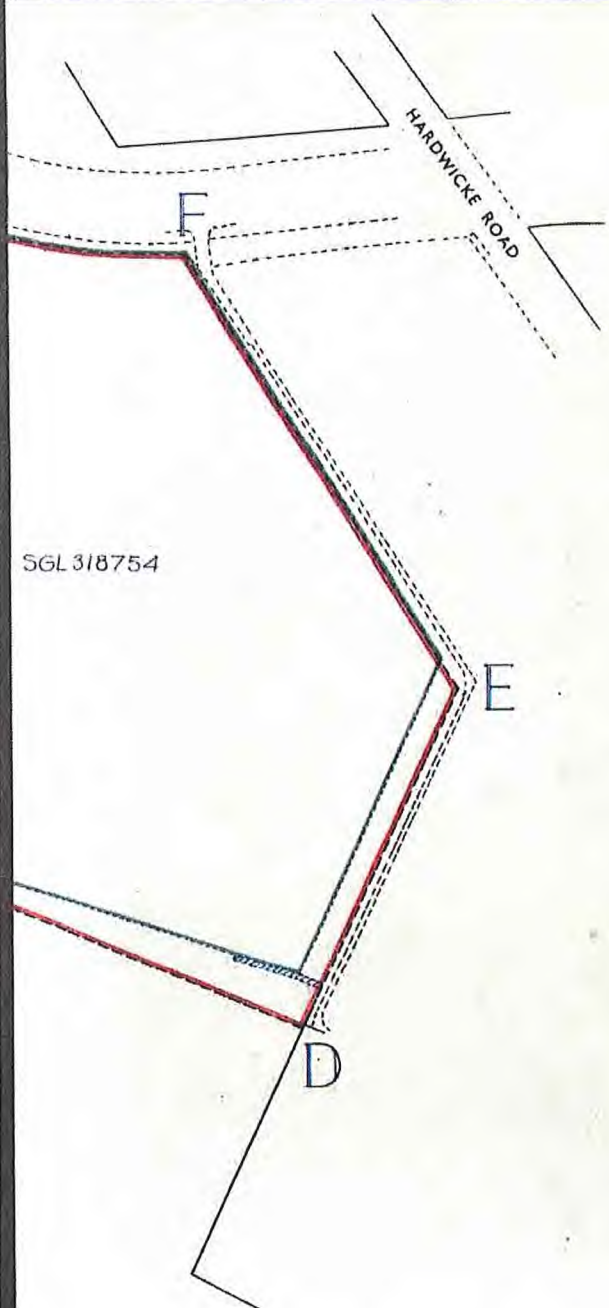




C

RIVER THAMES

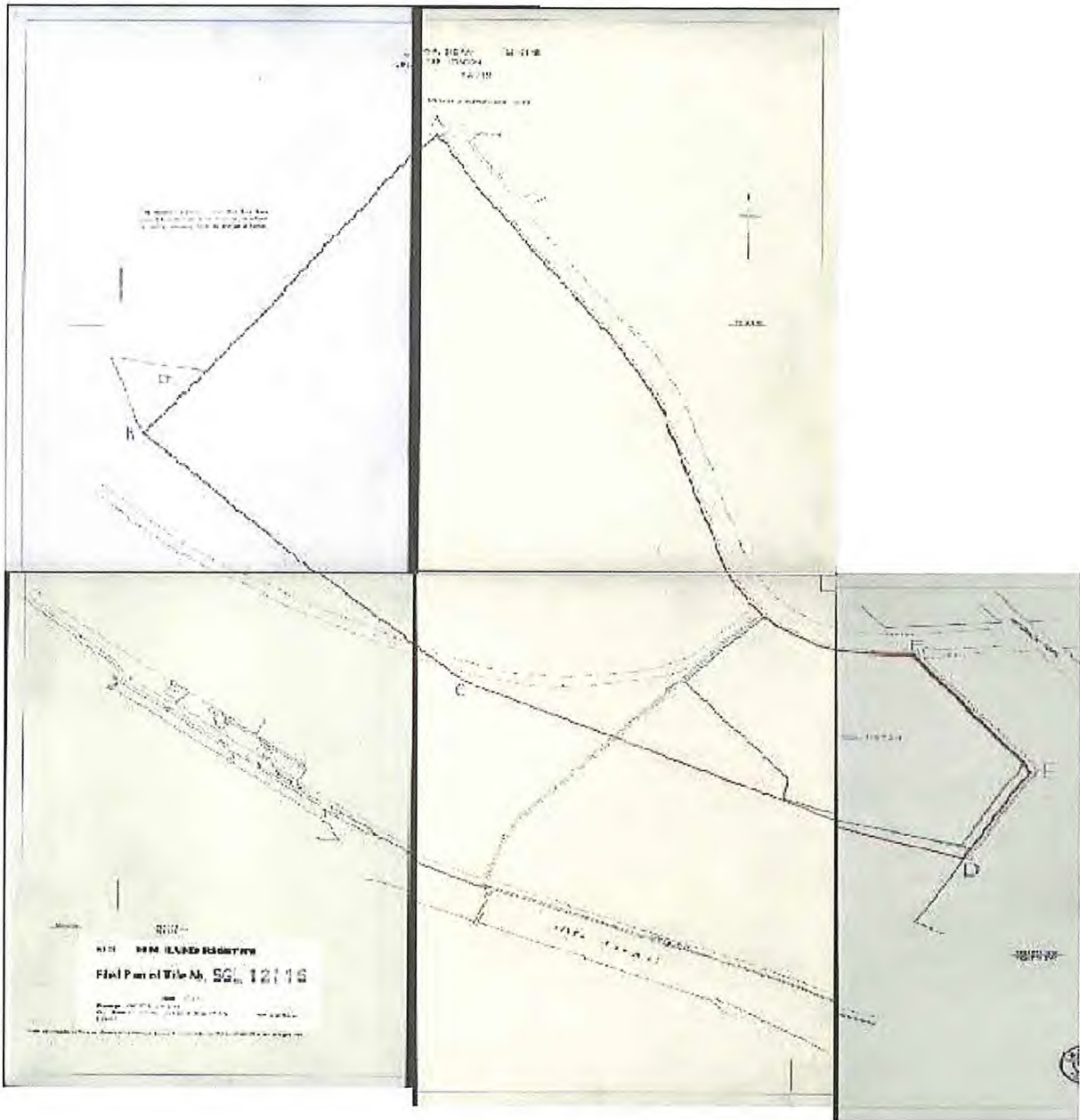
Towing Path

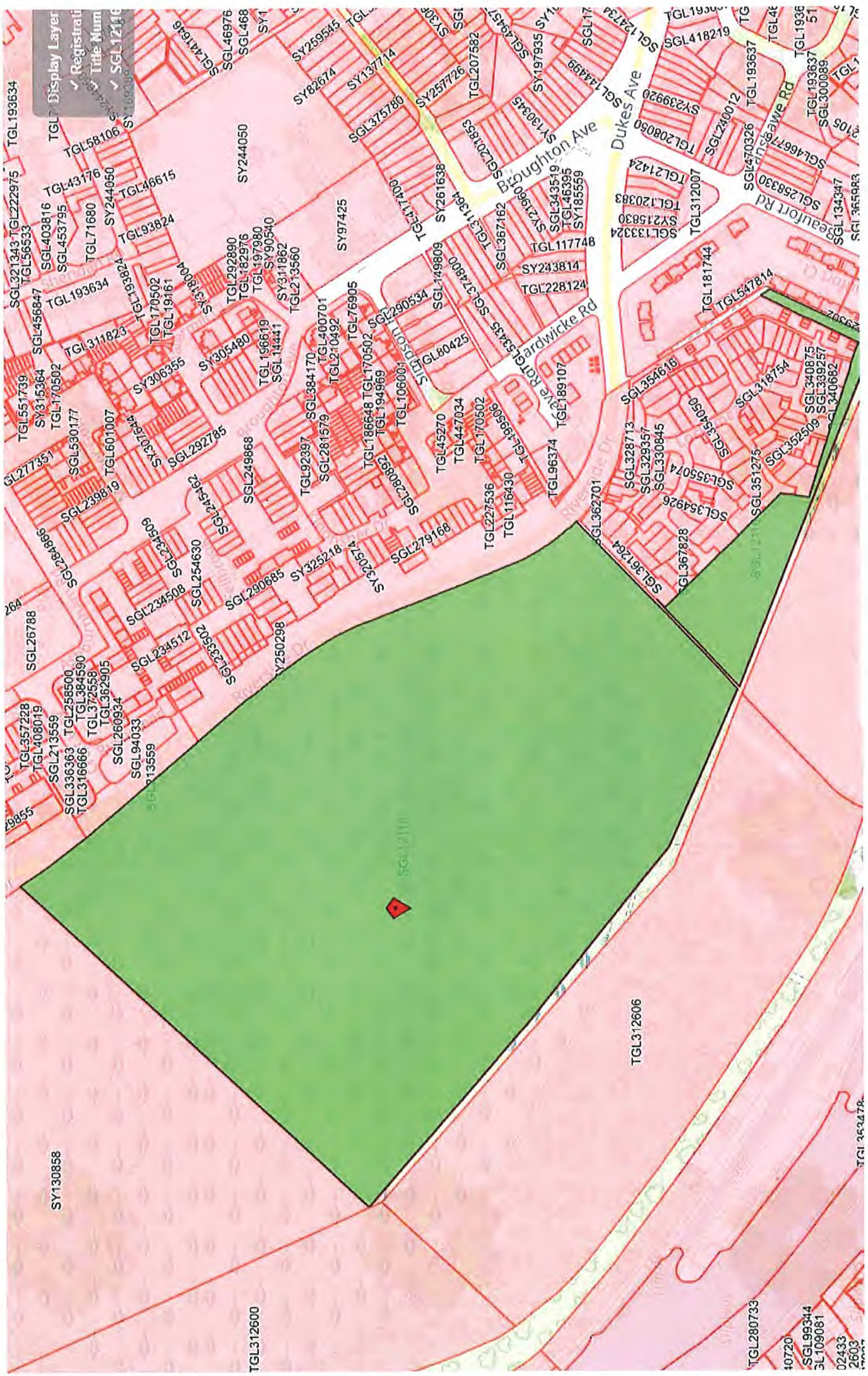


SGL 318754

TQ 1771 NW
TQ 1771 SW







SY130858

TGL312606

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✓ SGL12110

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Official copy of register of title

Title number TGL312606

Edition date 13.08.2008

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- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (13.08.2008) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land at Ham Riverside, Richmond.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (13.08.2008) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre 44 York Street, Twickenham, Middx TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (13.08.2008) A Conveyance of the land in this title and other land dated 14 April 1938 made between (1) Buckminster Estates and (2) The Mayor Aldermen and Burgesses of the Borough of Richmond (Surrey) contains restrictive covenants.

NOTE: Copy filed under TGL312526.
- 2 (13.08.2008) The land is subject to the rights reserved by the Conveyance dated 14 April 1938 referred to above.
- 3 (13.08.2008) The land is subject to the rights granted by an Agreement dated 1 January 1973 made between (1) The Mayor Aldermen and Burgesses of the London Borough of Richmond Upon Thames and (2) The Conservators of the River Thames.

NOTE: Copy filed.

Title number TGL312606

End of register

These are the notes referred to on the following official copy

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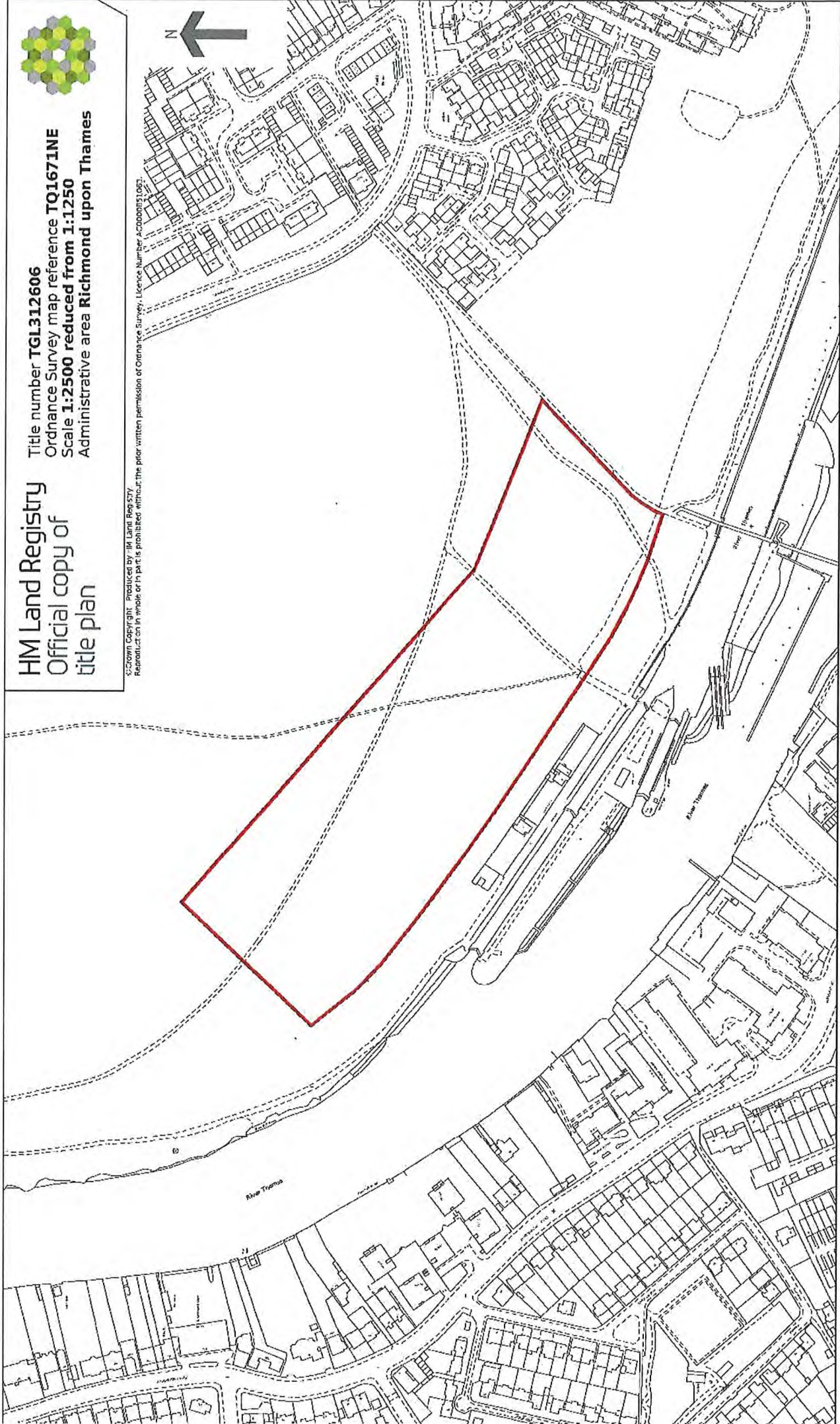
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HM Land Registry
Official copy of
title plan

Title number **TGL312606**
Ordnance Survey map reference **TQ1671NE**
Scale **1:2500** reduced from **1:1250**
Administrative area **Richmond upon Thames**

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Official copy of register of title

Title number TGL312632

Edition date 13.08.2008

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- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (13.08.2008) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being two parcels of land at Ham Riverside, Richmond.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (13.08.2008) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre 44 York Street, Twickenham, Middx TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (13.08.2008) A Conveyance of the land in this title and other land dated 14 April 1938 made between (1) Buckminster Estates and (2) The Mayor Aldermen and Burgesses of the Borough of Richmond (Surrey) contains restrictive covenants.

NOTE: Copy filed under TGL312526.

- 2 (13.08.2008) The land is subject to the rights reserved by the Conveyance dated 14 April 1938 referred to above.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

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This title is dealt with by the HM Land Registry, Telford Office .



HM Land Registry
Official copy of
title plan

Title number **TGL312632**

Ordnance Survey map reference **TQ1771NW**

Scale **1:2500** reduced from **1:1250**

Administrative area **Richmond upon Thames**

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Official copy of register of title

Title number TGL312822

Edition date 26.10.2010

- This official copy shows the entries on the register of title on 29 JAN 2025 at 15:23:57.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 29 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (15.08.2008) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being land at Ham Riverside, Richmond.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (15.08.2008) PROPRIETOR: The Mayor and Burgesses of the London Borough of Richmond upon Thames of Civic Centre 44 York Street, Twickenham TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (15.08.2008) A Indenture of the land in this title and other land dated 10 June 1903 made between (1) The Right Honourable Sir William John Manners Earl of Dysart (2) George Tourney Biddulph and The Honourable Stanhope Tollemache and (3) The County Council of the Administrative County of Surrey contains restrictive covenants.

NOTE 1: The plan referred to in the above Conveyance was not produced on first registration.

NOTE 2: Copy filed.

- 2 (15.08.2008) The land is subject to the rights reserved by the Indenture dated 10 June 1903 referred to above.
- 3 (26.10.2010) The land is subject to the rights granted by a Deed dated 20 October 2010 made between (1) The Mayor and Burgesses of the London Borough of Richmond upon Thames and (2) EDF Energy Networks (SPN) Plc.

Title number TGL312822

C: Charges Register continued

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed under TGL283358.

End of register

Postcode

Title number

Postcode

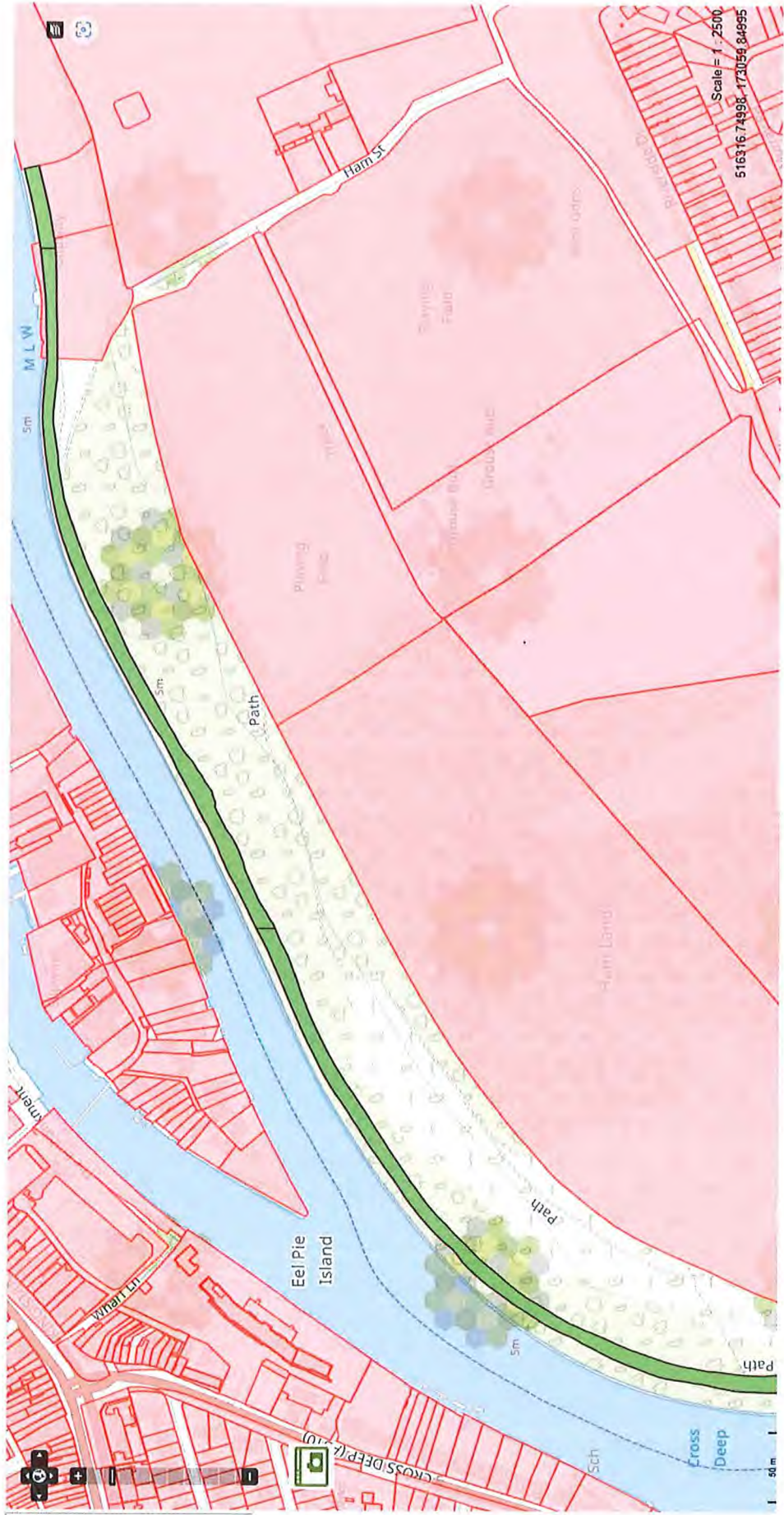
or

Street name only

Town or Locality

Titles (1 of 1 loaded)

Title number	Estate information	Address
TGL312822	Freehold	LAND AT HAM RIVERSIDE, RICHMOND



Postcode Title number

Postcode

or

Street name only

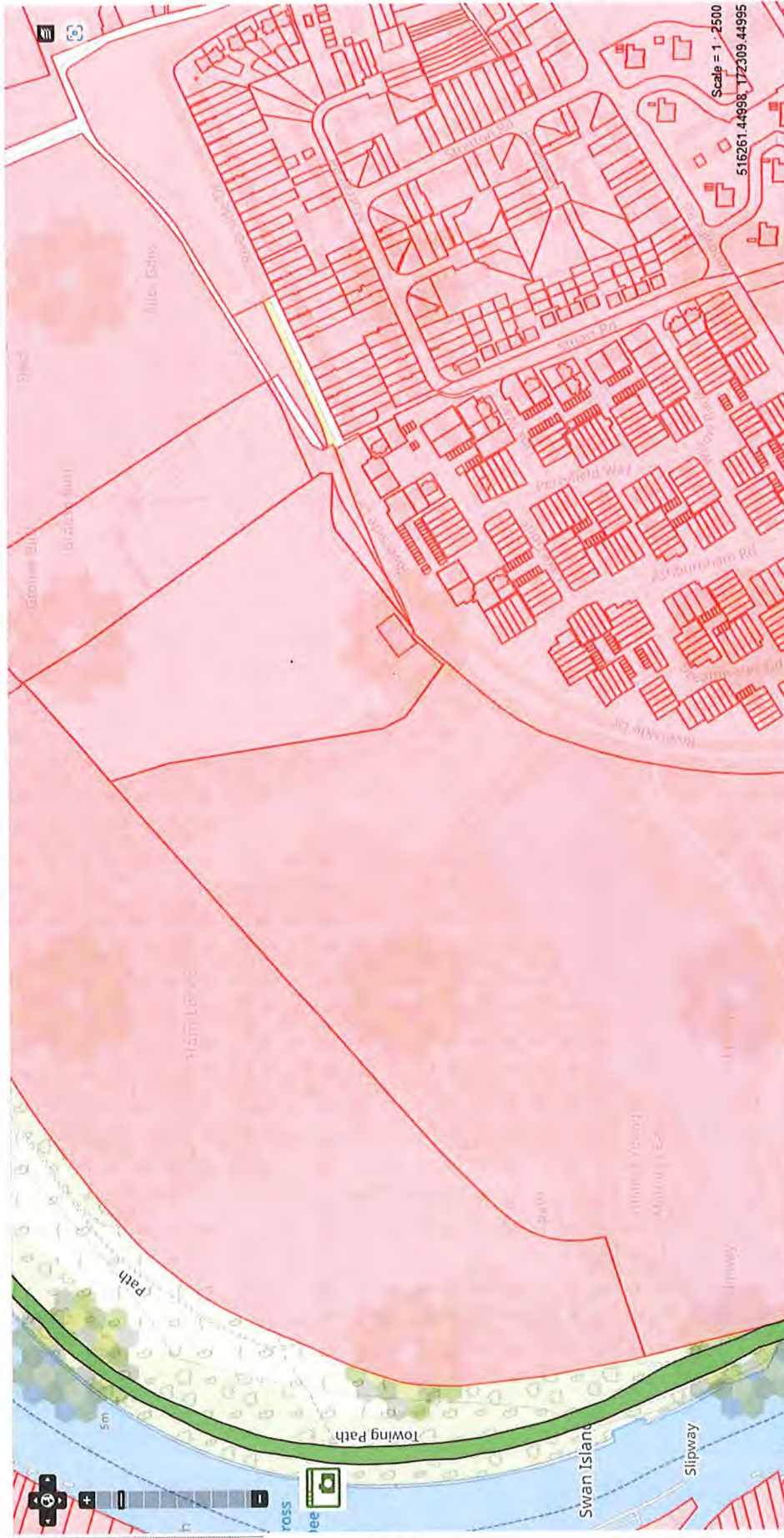
Town or Locality

Search

Reset

Titles (1 of 1 loaded)

Title number	Estate information	Address
TGL312822	Freehold	LAND AT HAM RIVERSIDE RICHMOND





Postcode Title number

Postcode

or

Street name only

Town or Locality

Titles (1 of 1 loaded)

Title number	Estate information	Address
TGL317822	Freehold	LANDAT HAM RIVERSIDE RICHMOND



His Conveyance

is made the fourteenth day of April One thousand, nine hundred and thirty eight Between Buckminster Estates a Company incorporated under the Companies Act 1929 and having its registered office at No. 2 New Square Lincoln's Inn in the County of London (hereinafter called "the Vendors") of the one part and The Mayor Aldermen and Burgesses of the Borough of Richmond (Surrey) (hereinafter called the "Corporation") of the other part.

Whereas the Vendors are seized in unincumbered fee simple of the hereditaments hereby assured, subject only to the Leases affecting parts thereof particulars of which are contained in the First Schedule hereto

And whereas the Vendors have agreed with the Corporation for the sale to them of the said hereditaments for such unincumbered fee simple as aforesaid subject to and with the benefit of the said Leases (except as herein provided with respect to the royalties payable by the Flax River Brick Company Limited) and subject to the reservation of the rights of way and other rights herein mentioned at the price of Twenty five thousand pounds

And whereas the land coloured blue on the plan annexed hereto was recently sold and conveyed with other lands by the Vendors to Arthur Charles Flowers by a Conveyance dated the twenty fourth day of July One thousand, nine hundred and thirty six subject to a restrictive covenant that the said piece of land and

RECEIVED BY THE CORPORATION OF RICHMOND
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any building which might at any time be thereon, should not at any time be used as a place of public entertainment, or public resort.

And whereas the land coloured orange on the said plan, was recently sold and conveyed with other lands by the Vendors to Avery Edward Godden and George William Godden, by a conveyance dated the fifth day, February One thousand nine hundred and thirty seven, subject to the like restrictive covenant.

And whereas the said land coloured blue and the said land coloured orange, was subsequently sold and conveyed to the Corporation by Arthur Charles Hervey and Avery Edward Godden and George William Godden respectively, subject to the said restrictive covenant.

And whereas the Vendors have agreed to release the Corporation their successors and assigns from the said restrictive covenant to such extent as hereinafter mentioned.

Now this Deed witnesseth as follows:

1. In consideration of Twenty five thousand pounds paid by the Corporation to the Vendors (the receipt whereof the Vendors hereby acknowledge) the Vendors as Beneficial Owners hereby convey unto the Corporation All those lands in the Parish of Stain in the County of Surrey containing altogether 65.23 acres or thereabouts and delineated on the plan hereto annexed and thereon coloured green pink pink hatched black brown and yellow. Excepting and Reserving nevertheless unto the Vendors in fee simple (a) A right of way at all times and for all purposes

with or without vehicles of any kind along the existing road ten feet wide distinguished on the said plan by the colour brown

(b) A right of way at all times and for all purposes (but on foot only) along the existing footpaths distinguished on the said plan by the colour yellow provided that the Corporation shall have the right with the written consent of the Tenders (which consent shall not be unreasonably withheld) at any time to alter the line of the said footpaths to such other position (being equally convenient for the purpose of giving access to Toddington Locks and the towing paths) as the Corporation shall think fit

(c) The right at the expense of the Tenders to construct at any time a road not exceeding thirty feet in width across the said land coloured pink between the points marked A and B on the said plan

(d) A right of way at all times and for all purposes with or without vehicles of any kind along the said road to be constructed as aforesaid by the Tenders between the points marked A and B provided that the right to construct the said road between the points marked A and B on the said plan shall not be exercisable by the Tenders after and the right of way so reserved thereover shall cease upon the commencement of the construction by the Local or Highway Authority of a new road across the said land coloured pink between the said points marked A and B on the said plan or approximately in that position to join the said

hereditaments unto the Corporation, in fee simple, subject to all existing rights of way and other easements (if any) and subject as to such parts of the same as are respectively comprised in the two Leases and in the annual tenancy specified in the First Schedule hereto to such Leases and tenancy respectively and with the benefit of the rent or the apportioned rent (except the royalties payable by the Ham River Grit Company Limited which shall continue to be received by the Vendors) and of the covenants, agreements and obligations (so far as applicable to the land hereby conveyed) on the part of the lessees and the tenant and the conditions therein respectively contained (including, in particular, the covenant by the Ham River Grit Company Limited to fill in and level the lands which they shall have ceased working).

2 The Corporation hereby covenants with the Vendors as follows videlicet

(a) At the expense of the Corporation, to maintain the said road and footpaths, respectively coloured brown and yellow on the said plans at all times hereafter in the same manner as public highways of the same respective characters in the Borough of Richmond.

(b) To permit the Vendors (notwithstanding anything contained in the Ham Planning Scheme No 9) to construct on such part of the Vendors' land immediately adjoining the premises hereby conveyed and between the points marked C and D and

between the points marked E and F on the said plan a road thirty six feet wide and to pay to the Vendor one half of the cost of constructing and severing the said road in accordance with the Specifications contained in the Second Schedule hereto and of lighting the said road such payment to be made if and when the said works are carried out

(c) Not to use the premises hereby conveyed or any part thereof or permit the same to be used otherwise than for the purposes of pleasure grounds and playing fields as provided by the Public Health Act 1875 and any Act amending that Act and the Physical Training and Recreation Act 1937

(d) At the expense of the Corporation to erect to the reasonable satisfaction of the Vendor's Surveyor

(i) A permanent fence five feet in height and constructed of iron standards and chain-link throughout the whole length of the southern boundary of the land to tower green on the said plan and

(ii) A temporary but adequate fence on the boundary of the land retained by the Vendor in all other places where the premises hereby conveyed adjoin the Vendor's said land

(the first mentioned fence to be erected forthwith and the secondly mentioned fence to be erected from time to time as and when the Corporation become entitled to possession of such adjoining portions

of the premises hereby conveyed)

3 The Vendors hereby covenant with the Corporation that if and when the said road to be constructed by the Vendors between the points marked C and D and between the points marked E and F on the said plan or any part thereof shall have been constructed the Vendors will permit the Corporation to have access to the said road from any part of the premises hereby conveyed which is contiguous to the said road and for that purpose to remove so much of the temporary fence mentioned in clause 2 hereof as shall abut upon a section of the said road

4 In pursuance of the said agreement and in consideration of the premises the Vendors hereby release and discharge the Corporation, their successors and assigns of and from the covenant that the said land coloured blue and the said land coloured yellow and any building for the time being thereon should not be used as or for a place of public entertainment or public resort to such extent only as shall authorities the same to be used for the purposes of pleasure grounds or playing fields as aforesaid and of and from any action proceedings claims and demands for or by reason or on account of any part breach or breaches of the said covenant

5 The Vendors hereby acknowledge the right of the Corporation to production and delivery of copies of the documents of title specified in the Third Schedule hereto and hereby undertake for the sake

custody thereof
 All witnesses whose of the vendors have caused their
 common seal to be hereunto affixed and the Corporation
 have caused their corporate seal to be hereunto affixed
 the day and year first above written

The First Schedule hereinbefore referred to

Lease or Tenancy	Term	Rent per annum
4 th November 1918 The Earl of Dysart (1) Frederick Hughes Secrett and Archibald William Secrett (2)	2 years from 29 th September 1918	£1.10.0 per acre
23 rd April 1929 The Earl of Dysart (1) The Ham River Lym Co Limited (then named "Thames River Lym Co Ltd") (2)	2 years from 25 th December 1928	Royalties
Verbal tenancy of Archibald William Secrett of land excavated and refilled	Annual Michaelmas tenancy	£1.10.0 per acre

The Second Schedule heretofore referred to

The road and sewers referred to in clause 2 (b) shall be constructed in accordance with the Plans, Planning Scheme No 1 (except as to the position of the road) and the Local Authority's Byelaws Regulation and Sewerage Street Works Specifications, in force at the date of date of construction.

The Third Schedule heretofore referred to

- | | |
|-------------------------------|---|
| 5 th June 1936 | Absent so dated and made between the said Agatha Countess of Dysart and Cecil Lionel Newcomen Tollemache (1) and Buckingham Palace Estates (2) |
| 6 th December 1893 | Conveyance so dated and made between Tenelope Oliver Meade (1) The Right Honourable Charles Douglas Richard Baron Sudeley, Charles Edmund Webber and George Tourmay Riddulphs (2) |
| 6 th December 1893 | Deed of Trust and Indemnity so dated and made between the said Tenelope Oliver Meade (1) Edmund Clarke Schomberg (2) and the said Baron Sudeley, Charles Edmund Webber and George Tourmay Riddulphs (3) |
| 20 th August 1907 | Conveyance so dated and made between William James Spooner, James Melling, Philip Melling, John and Maria Louisa Melling (1) the Earl of Dysart (2) and the said |

George Tournay Biddulph and the Honourable
 Stanhope Tollemache (3)

3rd October 1907 Admission, so dated of the Earl of Dysart
 3rd October 1907 Surrender, so dated, by the said William
 James Spower James Willing Philip
 Willing Pitts and Maria Louisa Willing

4th November 1918 Counterpart Lease, so dated and made
 between the Earl of Dysart (1) and
 Frederick Augustus Seccitt and Archibald
 William Seccitt (2)

23rd April 1929 Counterpart Lease, so dated and made
 between the Earl of Dysart (1) and
 Thomas Taverly & Co Limited (2)

The Common Seal of
 Buckminster Estates was
 hereunto affixed, in the
 presence of

C. L. Munnice. Director
 W. Routell Secretary

(Over)

The Corporate Seal of the
Mayor Aldermen and
Burgesses of the Borough of
Richmond (Surrey) was
herewith affixed by Order
of the Council this
day of 1938 in
the presence of

Mayor

} Members of
the Council

Town Clerk



The Agreement

made the fifteenth day
of April One thousand
nine hundred and two
Between The Right
Honourable Sir William John Manners
Earl of Dysart (hereinafter called "Lord Dysart")
of the one part and The County Council
of the Administrative County of Surrey
(hereinafter called "the Council") of the other part
Whereas under the Settlement created by the Will of
the late Sir Lionel William John Manners Earl of
Dysart Lord Dysart is tenant for life of the Manors lands
and hereditaments thereby settled (hereinafter referred to
as "the Dysart Estates") And whereas the (Dysart Estates
comprise (inter alia) a strip of freehold land comprising
forty five acres or thereabouts lying along the Surrey
Bank of the River Thames between the Northern
boundary of the Parish of Ham and a point
known as Half Mile Tree near the Southern boundary
of the same parish which strip of land is shown
upon the plan hereto annexed and marked
and is thereon coloured brown and hereinafter
to be called "Ham Riverside Land" And whereas negotiations
have lately taken place between Lord Dysart and
the Council and others with the view to an arrange-
ment whereby (amongst other matters) the Ham Riverside
Land may (subject as hereinafter mentioned) be vested
in the Council and certain reputed Tannery rights
over lands situate in the said Parish of Ham (the
greater portion whereof forms part of the Dysart Estates)
may be extinguished and a Bill is now pending in
Parliament for the purpose of authorising the said
arrangement and carrying the same into effect Now
in furtherance of the said arrangement it is hereby
agreed by and between the parties hereto conditionally
upon the said Bill being passed into Law in its
present or some modified form in the present Session
of Parliament as follows.

1. Lord Dysart so far as he lawfully may and can

do so as such tenant for life, or executor shall grant
and convey to the Council the Ham Riverside
Land and the inheritance thereof in fee simple free
from incumbrances subject as to the towing path
part of the said Ham Riverside Land to a perpetual
right to the public of towing vessels and boats upon
the River Thames upon payment to the Council
of the annual ^{sum} part of Twenty pounds by the Conservators
of the River Thames

2. Upon the said grant there shall be reserved to
Lord Obyart and his successors in title the owners
for the time being of the Obyart Estates or any
part thereof his and their assigns (1) the free and
uninterrupted access of light and air at all times
over the Ham Riverside Land and every part thereof
to the buildings of whatever height and in whatever
position which shall for the time being be erected
or standing on the Obyart Estates or any part
thereof and to all windows and openings which may
from time to time and at any time exist in such
buildings (2) All such rights of way and passage
water and soil in over and upon the Ham Riverside
Land and every part thereof as now exist in respect
any portion of the Obyart Estates (3) full right of
access for Lord Obyart his heirs and assigns and
the Owners and occupiers for the time being of any
part of the Obyart Estates to and from the Ham
Riverside Land and to and from the River Thames over
the said Riverside Land including a right from time
to time with the consent of the Conservators of the
River Thames to erect temporary landing stages
adjoining to the Ham Riverside Land and a right to
make suitable approaches thereto over the Ham River
side land at such places and under such conditions as
may be agreed upon between the Owners for the time
being of the Obyart Estates and the Surrey County
Council provided that no landing stage shall be
erected adjoining any part of the Ham Riverside

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under such conditions as
the Owners for the time
and the Survey County
ling stages shall be
of the Ham River side

Land for a distance of twelve hundred yards above
Turchenham Ferry and (14) full right and liberty for
Lord Opyart during his life and his friends in his
company at all times by day or by night and for all
purposes of pleasure with or without horses and
vehicles of all kinds to pass and repass at his and
their own risk along over and upon the Ham River side
Land Provided always and it is hereby agreed that no
unpaved road or way shall be constructed upon the
Ham River side Land by Lord Opyart or the Council
or by any other person or body thereon other than
a gravelled footpath and a necessary and suitable
path for towing boats and vessels incidental to the
navigation of the River Thames

3. The Council shall at all times retain and
preserve the Ham River side Land as an Open space
for the use enjoyment and recreation of the Public
subject to the reservations mentioned in Clause 2
hereof and shall not suffer any building to be erected
on the Ham River side Land or on any part thereof
except a cottage and shed for the use of a boatman
at such place as shall be agreed upon between
Lord Opyart or his Surveyor and the Council, nor shall
they plant any trees or shrubs or do or permit any other
act or thing to be done upon the Ham River side Land
or any part thereof which shall or may materially obstruct
the view of the River Thames ^{from the Ham House and property} or become a
nuisance damage or annoyance to Lord Opyart or the
Owners or occupiers for the time being of any portion
of the Opyart Estates

14. Lord Opyart shall within six calendar months after
the passing of the said Bill give up sufficient
Lammas Land forming part of the said Opyart
Estates and shown upon the Plan "B" hereunto annexed
and thereon coloured yellow to make the portion of
the main road or highway leading from Richmond
to Kingston and shown on the said Plan "B" and
thereon bordered partly on one side and partly on

the other side with a red line fifty feet
in width at all points where it abuts on such
Lammao Land to the intent that the strip of
Lammao land on either side of the said main
road or highway so to be given up as aforesaid
shall for ever thereafter form part of the said
main road or highway.

5. If the said pending Bill shall ~~not~~ be
passed into law in its present or some
modified form (as hereinafter mentioned) in the
present session of Parliament the ~~agreements~~
~~heretofore contained shall be void but if it~~
~~shall be so passed the parties hereto shall~~
execute all such deeds and documents and
shall do all such acts and things as may
be necessary or be deemed expedient to give
complete effect to the said agreements.

6. On the faith of this Agreement being
in all respects specifically performed and
observed on the part of Lord Dyar the
Council shall not offer or sanction any
opposition to the said Bill provided always
and this Agreement is entered into by the
Council upon the express condition that the Bill
shall be amended so as to be consistent
with these presents in all respects and also
that all provisions therein relating to or
affecting the control and management of the
Horn Riverside Land shall be so drawn
altered or amended that such control and
management shall be vested in the Council.

7. This Agreement is made subject to such
alterations as Parliament may think fit to
make herein but if the Committee on the
Bill make any material alteration in this
Agreement it shall be competent for either of
the parties hereto to withdraw the same.

8. Any questions arising under this Agreement

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Tollemache
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between the Owner for the time of
the Dyson Estates and the Council shall
settled by Arbitration

As witness the hand of Lord Dyson and the
Seal of the Council.

Signed by the abovesigned Sir
William John Manners Earl of
Dyson by the Honorable Stanhope
Tollemache his attorney under a
power of attorney dated the 20th
day of March 1902 in the
presence of

Dyson
by his attorney
Stanhope Tollemache

Mrs. E. Manks
Attorn 3 Croft Street, Ipswich.
Scripser Clerk.



IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF13

This is the exhibit marked "YF13" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Applications are pending in HM Land Registry, which have not been completed against this title.



Official copy of register of title

Title number TGL290940

Edition date 27.03.2014

- This official copy shows the entries on the register of title on 17 MAY 2024 at 12:43:55.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (03.05.2007) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being land at Ham Common, Ham, Richmond.

NOTE: The land tinted green on the title plan is not included in the title.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (03.05.2007) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre 44 York Street, Twickenham, Middx TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (03.05.2007) A Conveyance of the land in this title dated 17 June 1903 made between (1) The Right Honourable Sir William John Manners Earl of Dysart and (2) The Ham Urban District Council contains restrictive covenants and reserves rights.

NOTE: -Copy filed.

- 2 (03.05.2007) The land is subject to the rights granted by a Deed dated 21 September 1979 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) British Gas Corporation.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed.

Title number TGL290940

C: Charges Register continued

- 3 (03.05.2007) The land is subject to the rights granted by a Deed dated 24 March 1983 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) The South Eastern Electricity Board.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed.

- 4 (03.05.2007) A Licence dated 25 March 1998 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) Ham and Petersham Cricket Club relates to the use of the cricket table and outfield at Ham Common.

NOTE: Copy filed.

- 5 (03.05.2007) The land is subject to the rights granted by a Deed dated 18 June 2004 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) Ann Maureen Laurence.

NOTE: Copy filed.

- 6 (20.05.2013) The part of the land affected thereby is subject to the rights granted by a Deed of Grant of Easement dated 18 April 2013 made between (1) The Mayor and Burgesses of the London Borough of Richmond Upon Thames and (2) Secretary of State for Justice.

NOTE:-Copy filed under SGL624225.

- 7 (13.03.2014) A Deed dated 4 March 2014 made between (1) The Mayor and Burgesses of the London Borough of Richmond Upon Thames and (2) Richard Charles Miller and Diana Miller relates to the grant of an easement upon the terms therein mentioned.

NOTE:-Copy filed.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

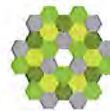
This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 13 January 2025 shows the state of this title plan on 13 January 2025 at 14:52:36. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

This title is dealt with by the HM Land Registry, Telford Office .

HM Land Registry
Official copy of
title plan

Title number **TGL312281**
Ordnance Survey map reference **TQ1772NW**
Scale **1:1250**
Administrative area **Richmond upon Thames**



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IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF14

This is the exhibit marked "YF14" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number TGL312526

Edition date 12.08.2008

- This official copy shows the entries on the register of title on 13 JAN 2025 at 14:48:58.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 13 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (12.08.2008) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land at Ham Riverside, Richmond.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (12.08.2008) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre 44 York Street, Twickenham, Middx TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (12.08.2008) A Conveyance of the land in this title and other land dated 14 April 1938 made between (1) Buckminster Estates and (2) The Mayor Aldermen and Burgesses of the Borough of Richmond (Surrey) contains restrictive covenants.

NOTE: Copy filed.

- 2 (12.08.2008) The land is subject to the rights reserved by the Conveyance dated 14 April 1938 referred to above.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

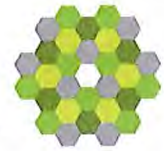
This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

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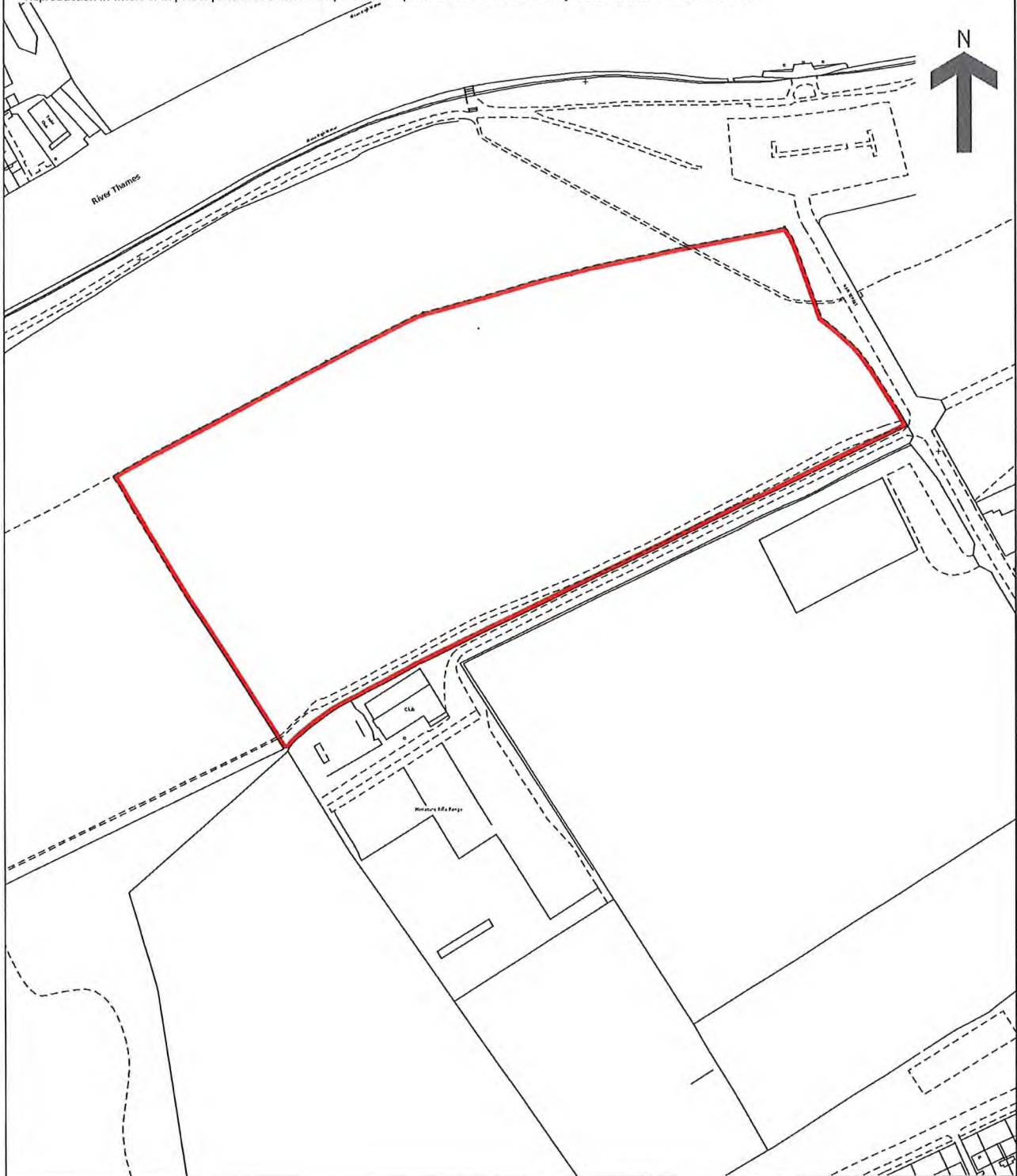
This title is dealt with by the HM Land Registry, Telford Office .

HM Land Registry
Official copy of
title plan

Title number **TGL312526**
Ordnance Survey map reference **TQ1673SE**
Scale **1:2500 reduced from 1:1250**
Administrative area **Richmond upon Thames**



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IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF15

This is the exhibit marked "YF15" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

7-D-705

A G R E E M E N T made the *twenty third* day of *June* One thousand nine hundred and nine BETWEEN THE COMMISSIONERS OF HIS MAJESTY'S WORKS AND PUBLIC BUILDINGS (hereinafter called "the Commissioners") of the one part and THE COUNCIL OF THE BOROUGH OF RICHMOND in the County of Surrey (hereinafter called "the Council") of the other part WHEREBY in exercise of the power for this purpose contained in Section 7 (1) of the Crown Lands Act 1906 IT IS AGREED by and between the parties hereto as follows

1. THE Commissioners shall as from the date hereof transfer to the Council and the Council shall accept and ever after retain and exercise the control and management as open spaces of Richmond Green and Kew Green in the County of Surrey as shown on the two Plans annexed hereto and thereon coloured red Subject to the existing commonable rights therein and to the conditions and reservations hereinafter contained.
2. RICHMOND GREEN and Kew Green shall both for ever be kept by the Council as open spaces within the meaning of the Open Spaces Acts 1877 to 1890 and be maintained by the Council.
3. THE Council shall give to the Commissioners full and free use and enjoyment of the said Greens and shall refer all matters relating to the approval of the Commissioners.
4. NO new building shall at any time hereafter be erected on either of the said Greens or on any part thereof respectively except at the instance of the Council and with the consent of the Commissioners and in accordance with plans and elevations approved by the Commissioners.
5. THE Council shall take over and continue to employ during good behaviour and upon the same terms and conditions as those upon which they are now employed the one labourer now employed by the Commissioners on each of the said Greens.
6. THE said transfer shall be subject to all the licenses and liberties heretofore granted to adjoining owners or owners and now subsisting and affecting the said Greens or any part of either thereof respectively and the Commissioners may revoke alter or renew any such license or liberty and with the consent of the Council under their Corporate Seal grant any further license or liberty the annual consideration (if any) to be hereafter paid to the Council.
7. THE Commissioners shall pay to the Council the yearly sum of TWO HUNDRED POUNDS such payment to be made on the thirty first day of December in each year and the first payment to be made on the thirty

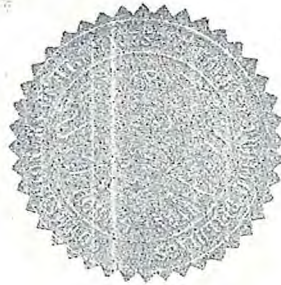
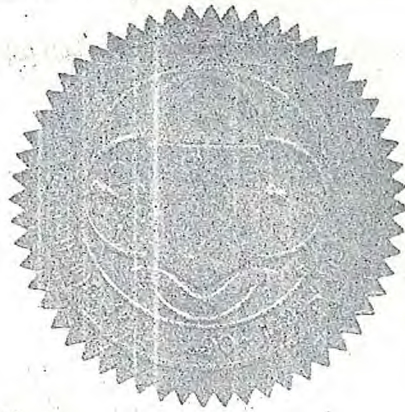
first day of December One thousand nine hundred and nine and to be a proportionate sum for the period between the date hereof and such thirty first day of December.

IN WITNESS whereof the Commissioners and the Council have hereunto affixed their respective Corporate Seals the day and year first above written.

The Corporate Seal of the
within named Council was
affixed hereto by order of the
Council in the presence of
W. C. Brooks }
H. C. Channon } Members of
 } the Council.

Henry Sagar
Town Clerk.

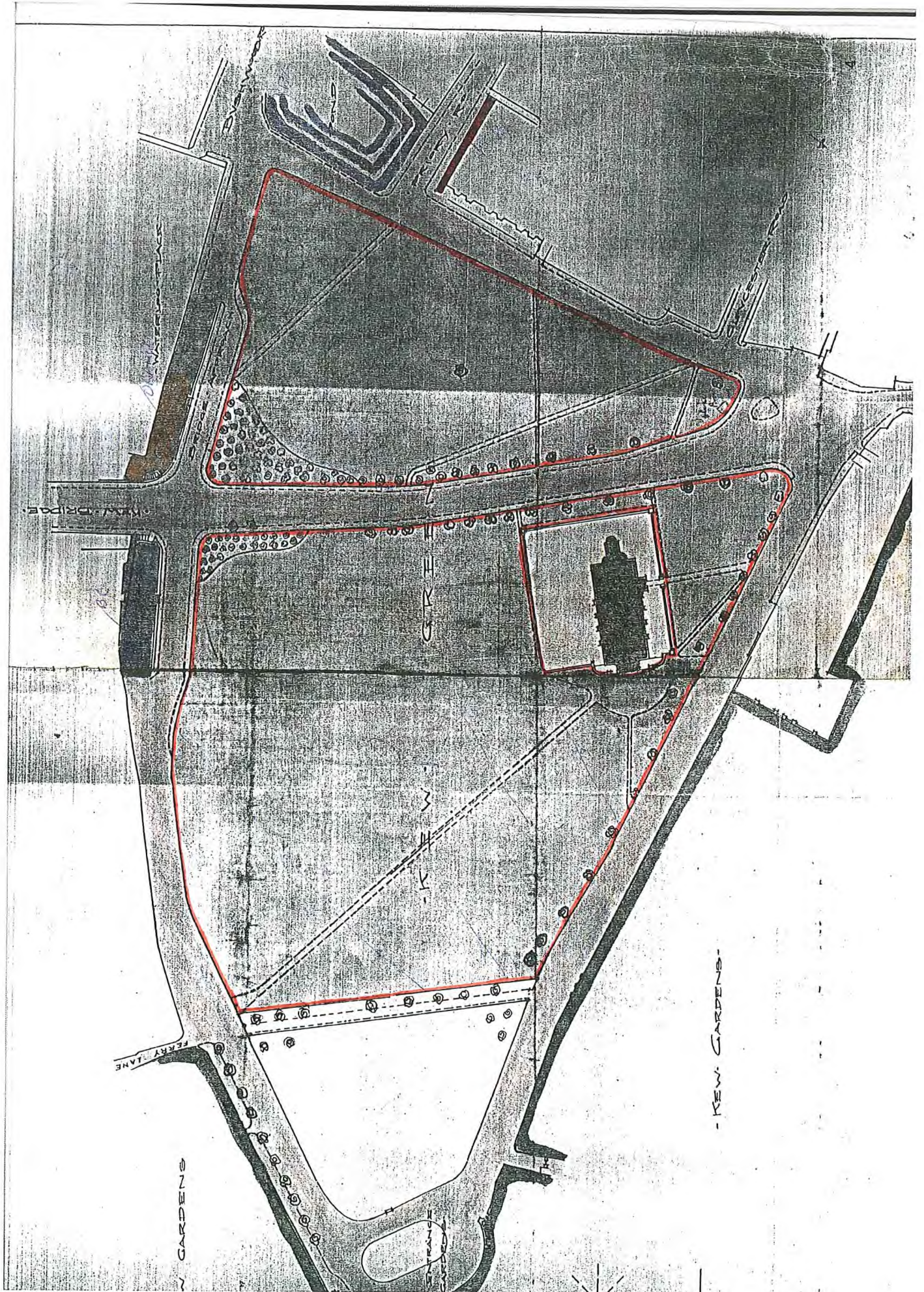
W. Thompson Mayor



Enrolled in the Office of Land Revenue Records and
Enrolments the 29th day of June 1909.

J. F. Handcock

Assistant Keeper of the Records.



K E W G A R D E N S

- K E W G A R D E N S -

K E W
G R E E N H O U S E

K E W
G R E E N H O U S E

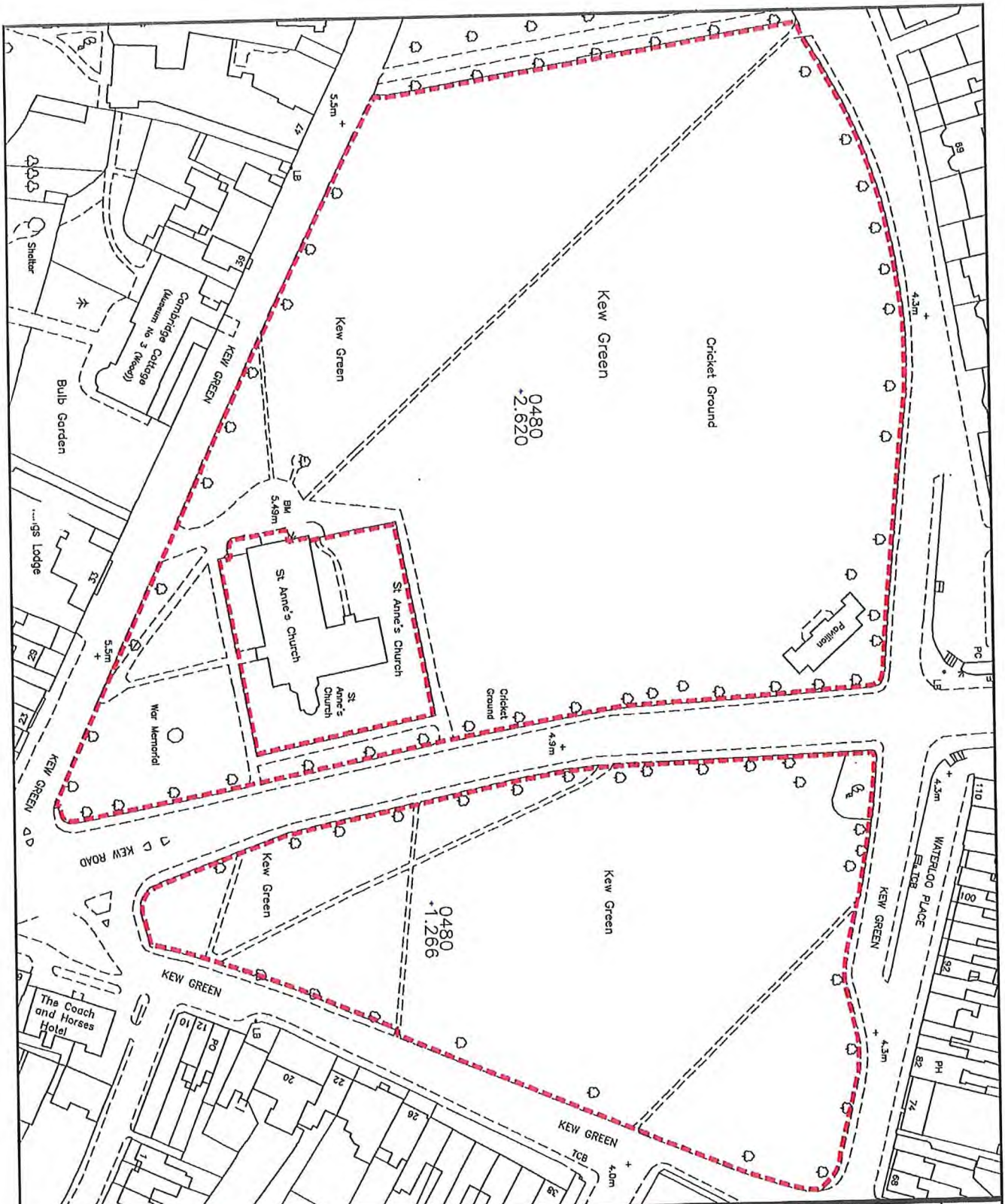
F E R R Y L A N E

K E W D R I P P E T

W A T E R F A L L

S T R A N G E R S

H O T E L



TITLE

0480 KEW GREEN, KEW

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 London Borough of Richmond Upon Thames
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Drg. No.

Drawn By

Scale
5
 1:1250

Date

MARCH 2002



LONDON BOROUGH OF
 RICHMOND UPON THAMES

Customer &
 Support Services

Civic Centre, 44 York Street, Twickenham TW1 3BZ Tel No. 0208 891 1411 Fax No. 0208 891 7751

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF16

This is the exhibit marked "YF16" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

THIS IS A PRINT OF THE VIEW OF THE REGISTER OBTAINED FROM HM LAND REGISTRY SHOWING THE ENTRIES SUBSISTING IN THE REGISTER ON 5 FEB 2019 AT 12:32:25. BUT PLEASE NOTE THAT THIS REGISTER VIEW IS NOT ADMISSIBLE IN A COURT IN THE SAME WAY AS AN OFFICIAL COPY WITHIN THE MEANING OF S.67 LAND REGISTRATION ACT 2002. UNLIKE AN OFFICIAL COPY, IT MAY NOT ENTITLE A PERSON TO BE INDEMNIFIED BY THE REGISTRAR IF HE OR SHE SUFFERS LOSS BY REASON OF A MISTAKE CONTAINED WITHIN IT. THE ENTRIES SHOWN DO NOT TAKE ACCOUNT OF ANY APPLICATIONS PENDING IN HM LAND REGISTRY. FOR SEARCH PURPOSES THE ABOVE DATE SHOULD BE USED AS THE SEARCH FROM DATE.

THIS TITLE IS DEALT WITH BY HM LAND REGISTRY, TELFORD OFFICE.

TITLE NUMBER: TGL461174

There is no application or official search pending against this title.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

RICHMOND UPON THAMES

- 1 (25.11.2016) The Leasehold land demised by the lease referred to below which lies within the area shown edged with red on the plan of the above Title filed at the Registry and being Fergusson Hall, Valletta Hall and Tideway House, Park Lane, Richmond (TW9 2RA).

NOTE: The sub strata and all water, watercourses and springs in and under the Property are excluded from the title.

- 2 (25.11.2016) The mines and minerals excepted by the Lease are excluded from this registration.

- 3 (25.11.2016) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
Date : 7 June 2016
Term : 25 years from 5 April 2016 to 4 April 2041
Parties : (1) The Crown Estate Commissioners Acting On Behalf Of Her Majesty
(2) The Crown Estate Commissioners
(3) The Mayor And Burgesses Of The London Borough Of Richmond Upon Thames

- 4 (25.11.2016) The Lease prohibits or restricts alienation.

- 5 (25.11.2016) The title includes any easements capable of subsisting at law referred to in clause IR11.1 of the registered lease but is subject to any rights that are granted or reserved by the lease and affect the registered land.

NOTE 1: The easements granted in Schedule 1(c) are included in the title only so far as they are legal easements and the landlord had the power to grant the same.

NOTE 2: The easements granted in Schedule 1 (c) are excluded from this registration.

- 6 (25.11.2016) The landlord's title is registered.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title number TGL461174

Title absolute

- 1 (25.11.2016) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre, 44 York Street, Twickenham TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (25.11.2016) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.
The leases grant and reserve easements as therein mentioned.
- 2 (25.11.2016) The land is subject for the term of 150 years from 16 March 2016 to 15 March 2166 to the rights granted by a lease dated 16 March 2016 made between (1) The Crown Estate Commissioners acting on behalf of Her Majesty The Queen (2) The Crown Estate Commissioners and (3) Christopher Brian Powell-Smith, William James Findlay Bryce and Philippa Ann Stedman.

-NOTE: Copy filed under TGL444862
- 3 (25.11.2016) UNILATERAL NOTICE in respect of an option to grant easements over the land in this title contained in a lease of Royal Mid Surrey Golf Course dated 16 March 2016 as therein mentioned.

-NOTE: Copy filed under TGL444862.
- 4 (25.11.2016) BENEFICIARY: Christopher Brian Powell-Smith, William James Findlay Bryce and Philippa Ann Stedman of Royal Mid Surrey Golf Club, Old Deer Park, Richmond, Surrey, TW9 2SB.

Schedule of notices of leases

- | | | | | |
|---|---------------|-------------------|---------------|-----------|
| 1 | 14.12.2011 | St John Ambulance | 24.05.2001 | TGL356414 |
| | Edged and | | 20 years from | |
| | numbered 1 in | | 5.8.1995 | |
| | blue | | | |

End of register



Postcode Title number

or

Titles (2 of 2 loaded)

Title number	Estate information	Address
TGL451174	Leasehold	FERUSSON HALL PARK LANE RICHMOND TW9 2RA
		144 RICHMOND SQUADRON AIR TRAINING CORPS PARK LANE RICHMOND TW9 2RA
		ST JOHN AMBULANCE PARK LANE RICHMOND TW9 2RA
		ILDRWAY HOUSE PARK LANE RICHMOND TW9 2RA
		I.S. GOODWIN PARK LANE

THIS IS A PRINT OF THE VIEW OF THE REGISTER OBTAINED FROM HM LAND REGISTRY SHOWING THE ENTRIES SUBSISTING IN THE REGISTER ON 13 JAN 2025 AT 14:41:45. BUT PLEASE NOTE THAT THIS REGISTER VIEW IS NOT ADMISSIBLE IN A COURT IN THE SAME WAY AS AN OFFICIAL COPY WITHIN THE MEANING OF S.67 LAND REGISTRATION ACT 2002. UNLIKE AN OFFICIAL COPY, IT MAY NOT ENTITLE A PERSON TO BE INDEMNIFIED BY THE REGISTRAR IF HE OR SHE SUFFERS LOSS BY REASON OF A MISTAKE CONTAINED WITHIN IT. THE ENTRIES SHOWN DO NOT TAKE ACCOUNT OF ANY APPLICATIONS PENDING IN HM LAND REGISTRY. FOR SEARCH PURPOSES THE ABOVE DATE SHOULD BE USED AS THE SEARCH FROM DATE.

THIS TITLE IS DEALT WITH BY HM LAND REGISTRY, TELFORD OFFICE.

TITLE NUMBER: TGL453765

There is no application or official search pending against this title.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

RICHMOND UPON THAMES

- 1 (08.08.2016) The Leasehold land demised by the lease referred to below which lies within the area shown edged with red on the plan of the above Title filed at the Registry and being Land at Old Deer Park, Twickenham Road, Richmond.
- 2 (08.08.2016) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
Date : 7 June 2016
Term : 25 years beginning on 5 April 2016 and ending on 4 April 2041
Parties : (1) The Crown Estate Commissioners acting on behalf of Her Majesty The Queen
(2) The Crown Estate Commissioners
(3) The Mayor And Burgesses Of The London Borough Of Richmond-Upon-Thames
- 3 (08.08.2016) The Lease prohibits or restricts alienation.
- 4 (08.08.2016) The title includes any legal easements referred to in clause LR11.1 of the registered lease but is subject to any rights that are granted or reserved by the lease and affect the registered land.
- 5 (08.08.2016) The mines and minerals excepted by the Lease are excluded from this registration.
- 6 (08.08.2016) The landlord's title is registered.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (08.08.2016) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND-UPON-THAMES of Civic Centre, 44 York Street, Twickenham TW1 3BZ.

Title number TGL453765

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (08.08.2016) The land is subject to the rights granted by a Deed dated 24 April 1963 made between (1) The Queen's Most Excellent Majesty (2) The Crown Estate Commissioners and (3) Richmond Borough Council.

NOTE: Copy filed under TGL322401.

- 2 (08.08.2016) The land is subject for a term of 42 years from 5 January 1974 to the rights granted by a lease dated 23 May 1974 of Richmond Athletic Ground made between (1) The Queen's Most Excellent Majesty (2) The Crown Estate Commissioners and (3) Richmond Athletic Association Limited as varied by a Deed dated 21 May 2009 made between (1) Her Majesty the Queen (2) The Crown Estate Commissioners and (3) Richmond Athletic Association Limited.

NOTE: Copy lease and Deed filed under SGL181052.

- 3 (08.08.2016) The land is subject to the easements granted by a lease dated 11 December 2014 of The Kings Observatory for a term of 150 years from 29 September 2014.

NOTE: Copy Lease filed under TGL414604.

- 4 (08.08.2016) The land is subject for the term of 150 years from 16 March 2016 to 15 March 2166 to the rights granted by a Lease Royal Mid Surrey Golf Course, Old Deer Lane dated 16 March 2016 made between (1) The Crown Estate Commissioners acting on behalf of Her Majesty The Queen (2) The Crown Estate Commissioners and (3) Christopher Brian Powell-Smith, William James Findlay Bryce and Philippa Ann Stedman.

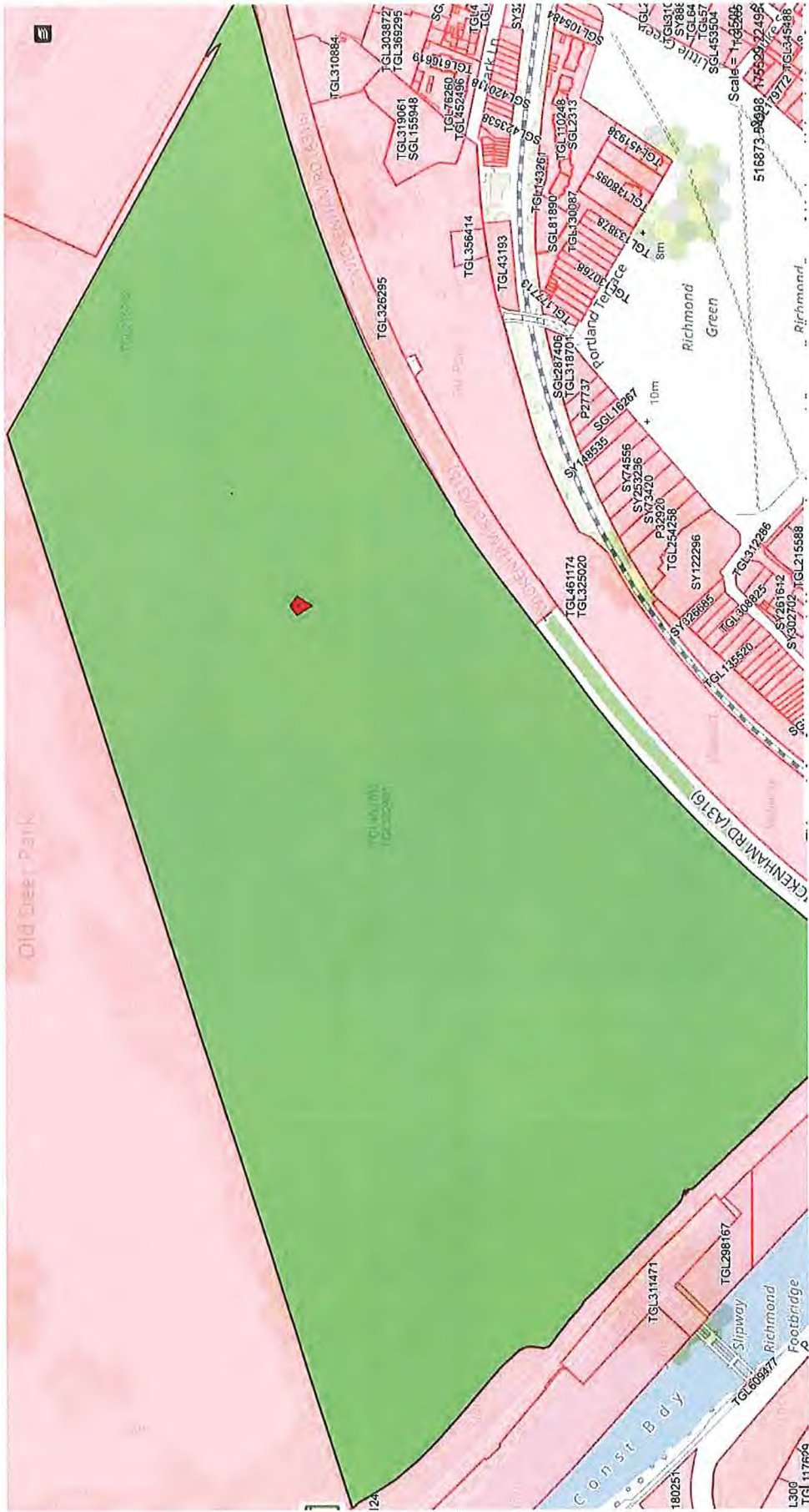
NOTE: Copy filed under TGL444862.

- 5 (08.08.2016) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.
The leases grant and reserve easements as therein mentioned.

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	05.07.2006 Edged blue, (part of)	Creche Facility, (Ground Floor)	20.04.2006 From 20.4.2006 to 1.4.2016	TGL275202

End of register



IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF17

This is the exhibit marked "YF17" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

A G R E E M E N T made the *twenty-third* day of *June* One thousand nine hundred and nine BETWEEN THE COMMISSIONERS OF HIS MAJESTY'S WORKS AND PUBLIC BUILDINGS (hereinafter called "the Commissioners") of the one part and THE COUNCIL OF THE BOROUGH OF RICHMOND in the County of Surrey (hereinafter called "the Council") of the other part WHEREBY in exercise of the power for this purpose contained in Section 7 (1) of the Crown Lands Act 1906 IT IS AGREED by and between the parties hereto as follows :-

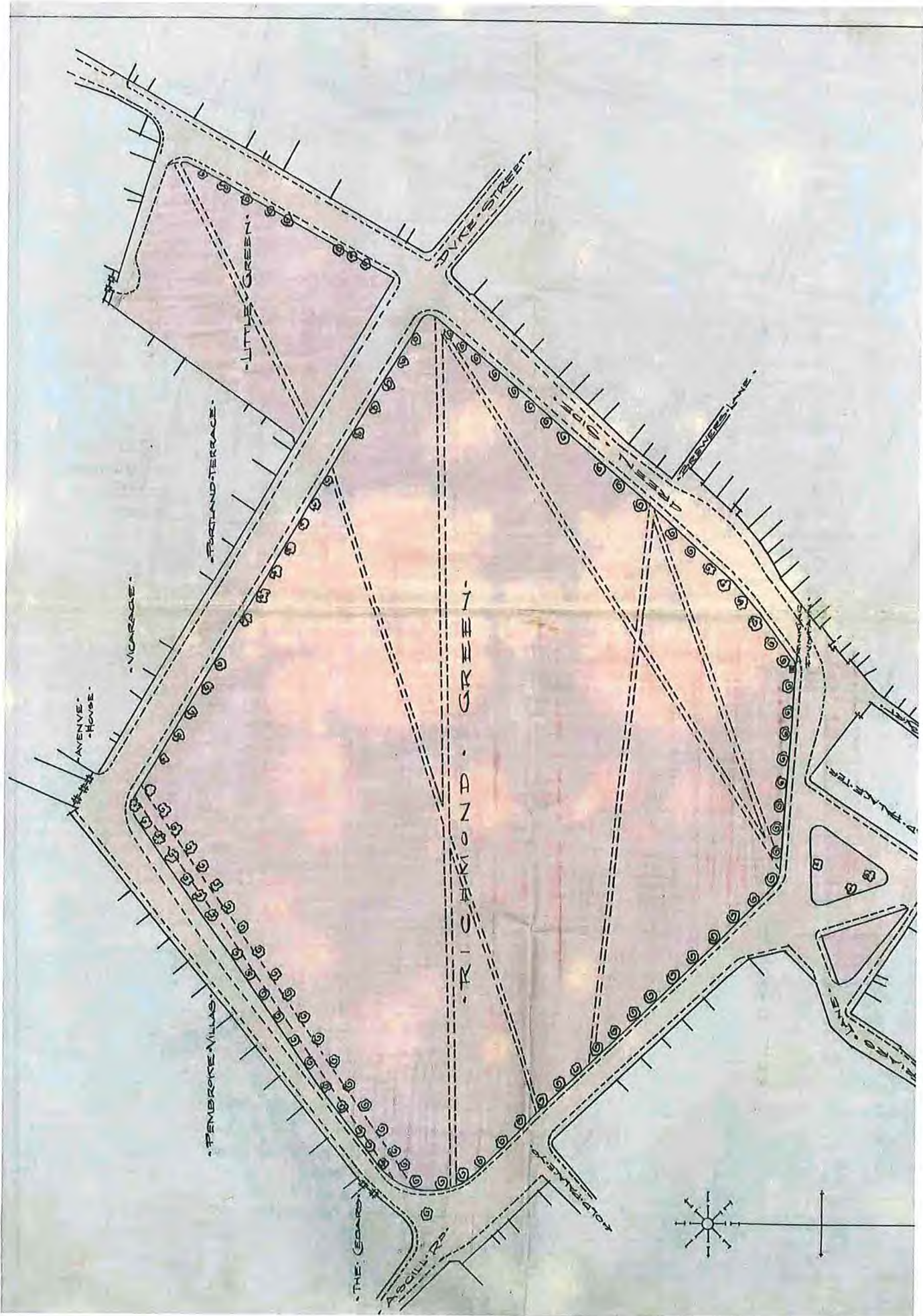
1. THE Commissioners shall as from the date hereof transfer to the Council and the Council shall accept and ever after retain and exercise the control and management as open spaces of Richmond Green and Kew Green in the County of Surrey as shown on the two Plans annexed hereto and thereon coloured red Subject to the existing commonable rights therein and to the conditions and reservations hereinafter contained.
2. RICHMOND GREEN and Kew Green shall both for ever be kept by the Council as open spaces within the meaning of the Open Spaces Acts 1877 to 1890 and be maintained by the Council.
3. THE Council shall have power to make bye-laws for the regulation of the use and enjoyment of the said Greens which bye-laws shall be subject to the approval of the Commissioners.
4. NO new building shall at any time hereafter be erected on either of the said Greens or on any part thereof respectively except at the instance of the Council and with the consent of the Commissioners and in accordance with plans and elevations approved by the Commissioners.
5. THE Council shall take over and continue to employ during good behaviour and upon the same terms and conditions as those upon which they are now employed the one labourer now employed by the Commissioners on each of the said Greens.
6. THE said transfer shall be subject to all the licenses and liberties heretofore granted to adjoining owners or others and now subsisting and affecting the said Greens or any part or parts thereof respectively and the Commissioners may revoke alter or renew any such license or liberty and with the consent of the Council under their Corporate Seal grant any further license or liberty the annual consideration (if any) to be hereafter paid to the Council.
7. THE Commissioners shall pay to the Council the yearly sum of TWO HUNDRED POUNDS such payment to be made on the thirty first day of December in each year and the first payment to be made on the thirty



Enrolled in the office of Land Revenue Records and
Enrolments the 29th day of June 1909.

S. F. Handeover R

Assistant Keeper of the Records.



IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

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AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF18

This is the exhibit marked "YF18" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Applications are pending in HM Land Registry, which have not been completed against this title.



Official copy of register of title

Title number TGL290940

Edition date 27.03.2014

- This official copy shows the entries on the register of title on 17 MAY 2024 at 12:43:55.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 10 Jan 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Telford Office.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (03.05.2007) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being land at Ham Common, Ham, Richmond.

NOTE: The land tinted green on the title plan is not included in the title.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (03.05.2007) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre 44 York Street, Twickenham, Middx TW1 3BZ.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (03.05.2007) A Conveyance of the land in this title dated 17 June 1903 made between (1) The Right Honourable Sir William John Manners Earl of Dysart and (2) The Ham Urban District Council contains restrictive covenants and reserves rights.

NOTE:-Copy filed.

- 2 (03.05.2007) The land is subject to the rights granted by a Deed dated 21 September 1979 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) British Gas Corporation.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed.

Title number TGL290940

C: Charges Register continued

- 3 (03.05.2007) The land is subject to the rights granted by a Deed dated 24 March 1983 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) The South Eastern Electricity Board.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed.

- 4 (03.05.2007) A Licence dated 25 March 1998 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) Ham and Petersham Cricket Club relates to the use of the cricket table and outfield at Ham Common.

NOTE: Copy filed.

- 5 (03.05.2007) The land is subject to the rights granted by a Deed dated 18 June 2004 made between (1) The Mayor and Burgesses of The London Borough of Richmond Upon Thames and (2) Ann Maureen Laurence.

NOTE: Copy filed.

- 6 (20.05.2013) The part of the land affected thereby is subject to the rights granted by a Deed of Grant of Easement dated 18 April 2013 made between (1) The Mayor and Burgesses of the London Borough of Richmond Upon Thames and (2) Secretary of State for Justice.

NOTE:-Copy filed under SGL624225.

- 7 (13.03.2014) A Deed dated 4 March 2014 made between (1) The Mayor and Burgesses of the London Borough of Richmond Upon Thames and (2) Richard Charles Miller and Diana Miller relates to the grant of an easement upon the terms therein mentioned.

NOTE:-Copy filed.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

There is an/are application(s) pending in HM Land Registry and if we have only completed the mapping work for a pending application affecting the title concerned, such as a transfer of part:

- additional colour or other references, for example 'numbered 1', may appear on the title plan (or be referred to in the certificate of inspection in form CI), but may not yet be mentioned in the register
- colour or other references may also have been amended or removed from the title plan (or not be referred to in form CI), but this may not be reflected in the register at this stage.

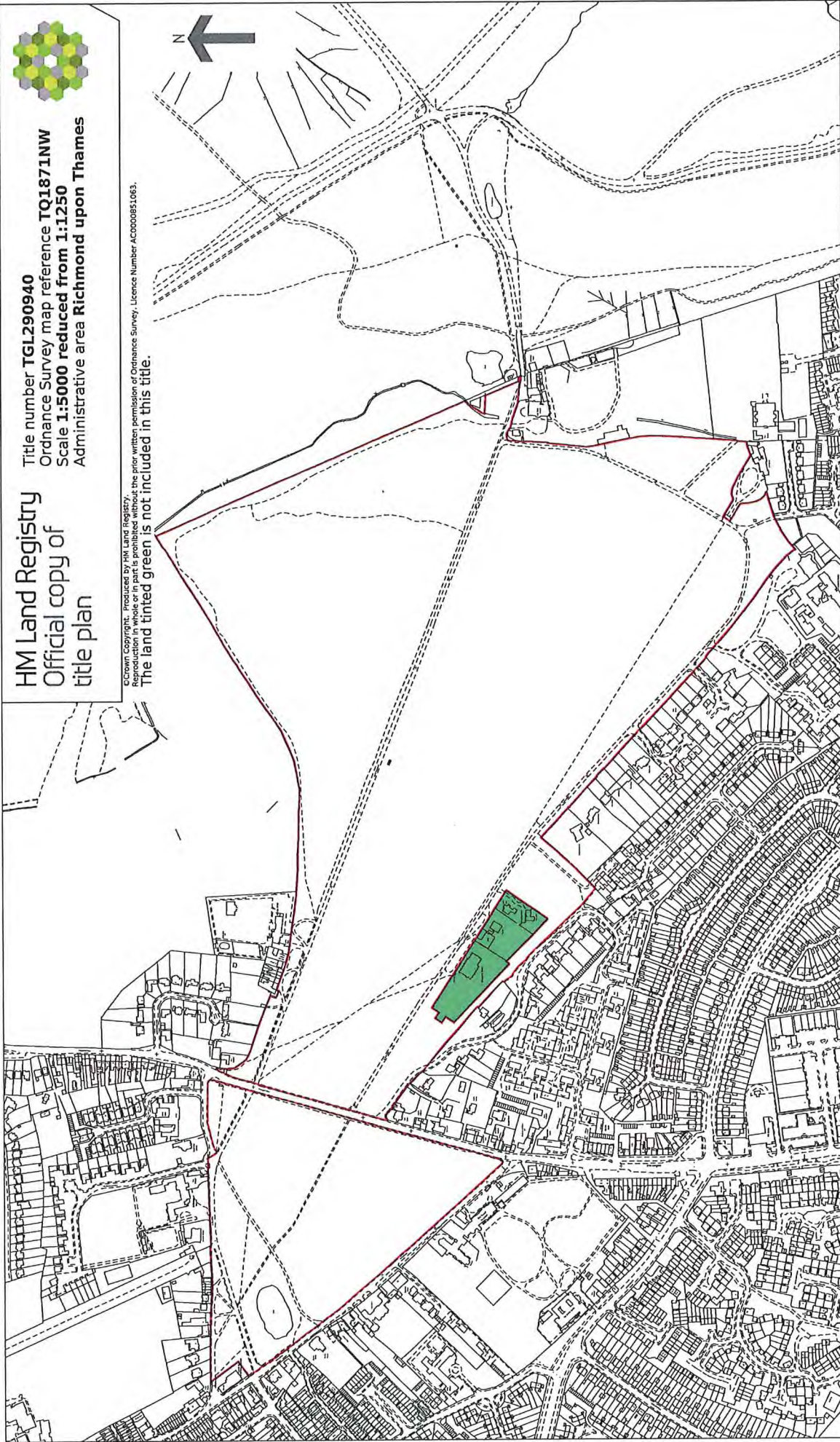
This official copy is issued on 10 January 2025 shows the state of this title plan on 17 May 2024 at 12:43:55. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. This title is dealt with by the HM Land Registry, Telford Office .



Title number **TGL290940**
Ordnance Survey map reference **TQ1871NW**
Scale **1:5000** reduced from **1:1250**
Administrative area **Richmond upon Thames**

HM Land Registry
Official copy of
title plan

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The land tinted green is not included in this title.



IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

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**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF19

This is the exhibit marked "YF19" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025



Official copy of register of title

Title number TGL277214

Edition date 03.08.2006

- This official copy shows the entries in the register of title on 10 January 2025 at 17:34:53.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 10 January 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- For information about the register of title, see www.gov.uk/land-registry.
- This title is dealt with by HM Land Registry Durham Office.

A: Property register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (03.08.2006) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being King George's Field and Allotment Gardens, Ham Street, Richmond.

B: Proprietorship register

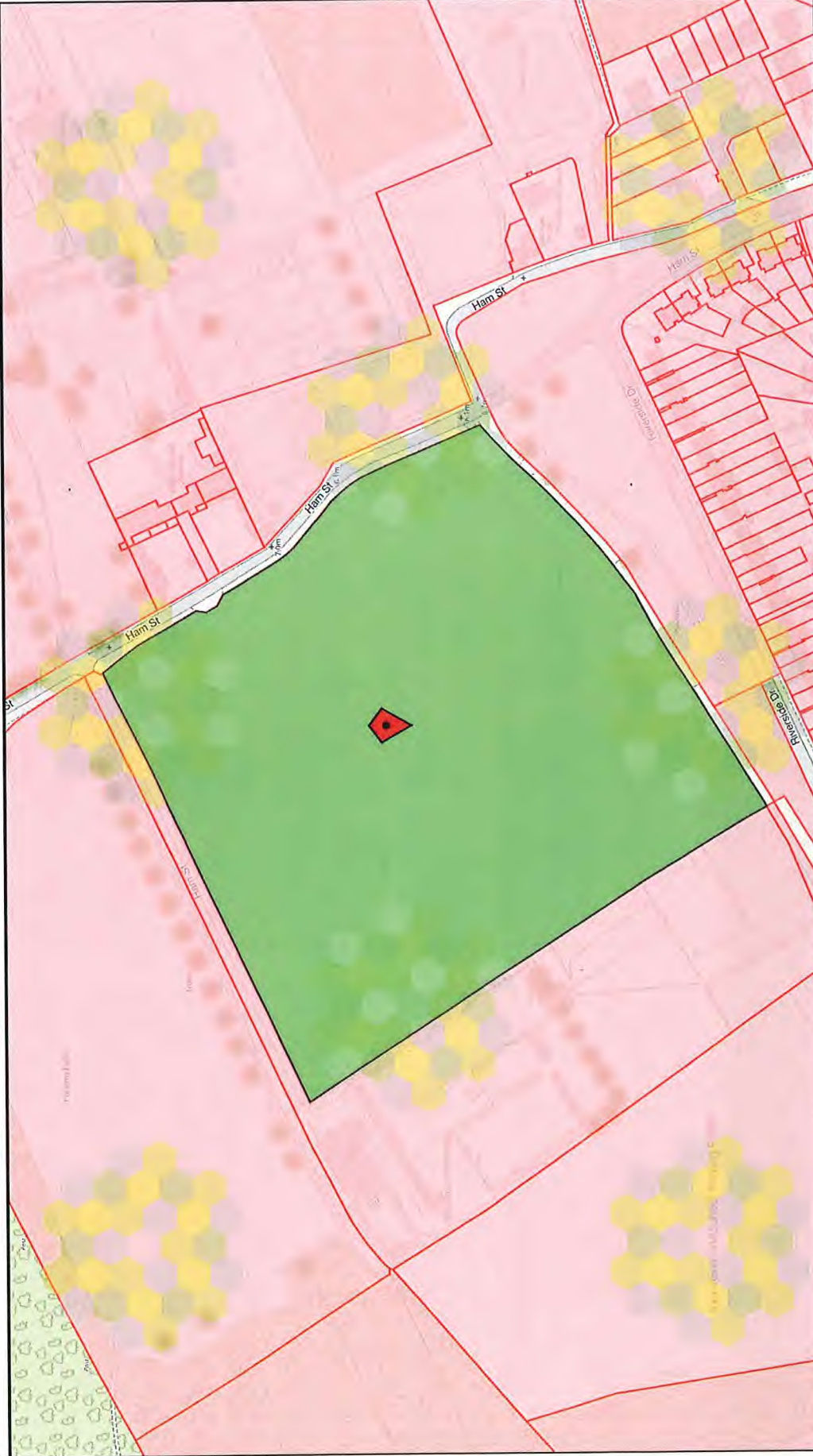
This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (03.08.2006) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES of Civic Centre, 44 York Street, Twickenham, Middlesex TW1 3BZ.

End of register





0 10 20 30 40 50 60 70 80 100m

Map scale 1:2500

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This map is for reference purposes only. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.
Data last updated 10:00pm 10 JANUARY, 2025



Land Registry

BETA

MapSearch Snapshot

Page 2

Title number	Estate information	Address
TGL277214	Freehold	KING GEORGE'S FIELD AND ALLOTMENT GARDENS HAM STREET, RICHMOND

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF20

This is the exhibit marked "YF20" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

Ham Lands



[Blacked out area]

[Blacked out area]

IN THE HIGH COURT OF JUSTICE CLAIM NO. 22/2024

KING'S BENCH DIVISION

Before: The Honourable Mr. Justice Freeman

Dated: 22 November 2024

BETWEEN:

THE MAYOR AND BURGESSES OF THE
LONDON BOROUGH OF RICHMOND UPON THAMES

vs

NO. 22/24/0017

(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT AND/OR OCCUPYING PUBLIC RECREATIONAL FACILITIES INCLUDING (WHATEVER) RECREATIONAL FACILITIES OR WITHOUT VEHICLES ON ANY OF THE SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM

(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM

MADE BY ORDER

EDMUND JONES

IF YOU ARE THE NAME OF DEFENDANT OR ANY PERSONS UNKNOWN WHOSE NAME IS LISTED IN SCHEDULE 1 OR WHOSE NAME IS LISTED IN SCHEDULE 2 TO THIS CLAIM AND YOU HAVE BEEN SERVED WITH THIS CLAIM AND YOU DO NOT WANT TO BE SERVED WITH THIS CLAIM, YOU SHOULD CONTACT THE OFFICE OF THE CLERK OF THE COURT AT THE ADDRESS SET OUT BELOW AS SOON AS YOU CAN BY EMAIL OR BY TELEPHONE.

[Blacked out area]

[Blacked out area]

[Blacked out area]

Ham
Riverside
Drive Open Space



Ham Riverside Pitches

10.00 am - 12.00 pm and 4.00 pm - 8.00 pm
Tuesdays - Fridays
We would like your feedback on this trial and encourage you to contact us.
parks@richmond.gov.uk 020 8487 5248
www.richmond.gov.uk/parks



R LONDON BOROUGH OF RICHMOND UPON THAMES
THE LONDON POLO CLUB
Established 1868
PARKS & OPEN SPACES



Informational text on the signpost, including contact details and a disclaimer.

THE LONDON BOROUGH OF RICHMOND UPON THAMES
PARKS & OPEN SPACES
DISCLAIMER

Ham Riverside Pitches



Kew Green



Kew Green



Old Deer Park

Old Deer Park

This site is managed by the London Borough of Richmond upon Thames and is covered by formal legislation. We aim to improve our services and we would like to hear your views and opinions from all sections of the community about the park or any aspect of our services.

If you would like to book any of the facilities or require any further information about the management of this site please contact us on:-

Telephone: 0208 878 1111
Email: parkinfo@richmond.gov.uk
Or visit www.richmond.gov.uk

- No Dogs
- No Smoking
- No Alcohol
- No Glass



THE LONDON BOROUGH OF RICHMOND UPON THAMES
COUNCIL

THE MATCH AND SUNDRIES ACT 1950
SECTION 1(1)

THE LONDON BOROUGH OF RICHMOND UPON THAMES
COUNCIL

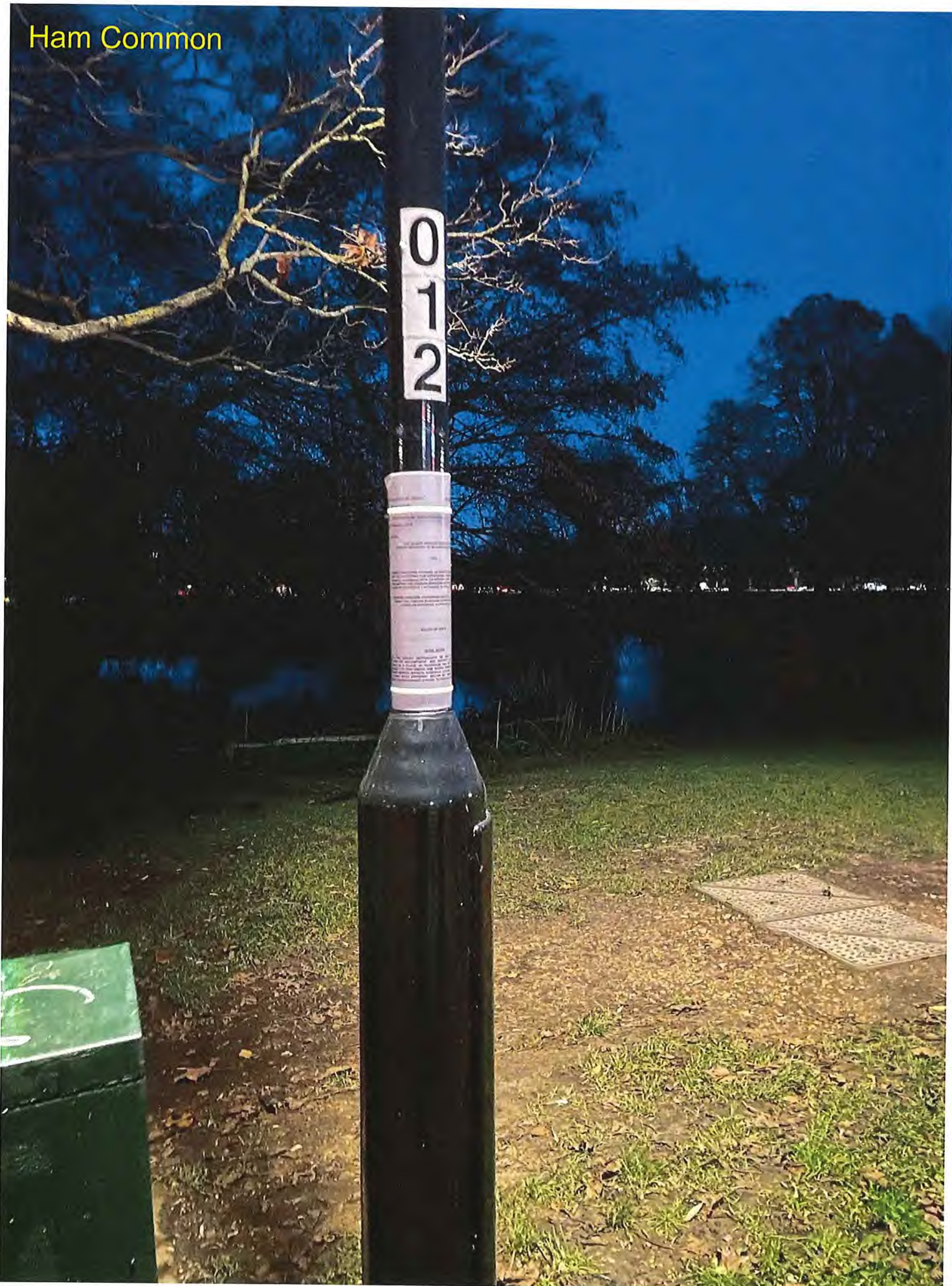
THE LONDON BOROUGH OF RICHMOND UPON THAMES
COUNCIL

THE LONDON BOROUGH OF RICHMOND UPON THAMES
COUNCIL

Old Deer Park



Ham Common



Ham
Common



Welcome to

King George's Field

The London Borough of Richmond upon Thames Parks are enjoyed by thousands of residents and visitors all year round. This site is one of over a hundred green spaces in the borough, managed by the Parks and Open Spaces Service. We aim to conserve and enhance the rich diversity of habitats and species and ensure they are protected for the benefit and enjoyment of future generations; so that diversity remains the borough's prime natural asset.

These facilities are open to everyone. We hope you enjoy your visit. Please remember to:

- Respect other users of this site
- Keep dogs under control
- Use the bins provided
- Report any accidents or damage



This site is managed by the London Borough of Richmond upon Thames and is covered by formal byelaws and Public Space Protection Orders. To contact us please call 0208 891 1411 or visit www.richmond.gov.uk/parks

This site is managed by the London Borough of Richmond upon Thames and is covered by formal byelaws. We aim to improve our service and we would like to hear views and opinions from all sections of the community about this park or any aspect of our service.

If you would like to book any of the facilities or require any further information about the management of this site please contact us on -

telephone: 0208 891 1411
email: parks@richmond.gov.uk
or visit www.richmond.gov.uk

Official notice from the London Borough of Richmond upon Thames, Parks and Open Spaces Service, regarding the management of King George's Field. The notice includes details about the site's location, the types of facilities available, and the rules governing their use. It also provides contact information for the Parks and Open Spaces Service.

King
George's
Field



IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

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AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF21

This is the exhibit marked "YF21" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

Public Notices

To advertise: 0798 997 4151 | email: lnomy@localiq.co.uk

Thursday, December 12, 2024



Planning Notices | Traffic Notices | Legal Notices
 Probate Notices | Other Notices | Church and Religious Notices
 Tenders and Contracts | Goods Vehicle Operator Licences

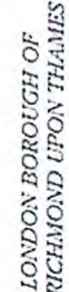
TRAFFIC & Roads

London Borough of Richmond Upon Thames Public Notices

ROAD TRAFFIC REGULATION ACT 1984 - SECTION 14 (1)
 Temporary Closure
 Length of Teddington Toppath PROW 133
 (Reference 24/192)

- The Council of the London Borough of Richmond upon Thames HEREBY GIVES NOTICE that to facilitate improvement works, they have made a temporary Traffic Order, the effect of which will be to introduce temporary prohibition of pedestrians in a length of the Teddington Toppath at the rear of Ham Street Car Park, PROW 133.
- Whilst the works take place no person shall proceed in the Teddington Toppath westwards for a distance of 30 metres.
- The order will come into effect on 17 December 2024. The closure will be required on a number of occasions between 17 December 2024 and 31 March 2025. The order will remain in force for a period of 6 months, to allow for unexpected events and possible remedial works.
- The prohibitions apply only during such time and to such extent as indicated by prescribed traffic signs.
- Nothing in the Order applies to:
 - any vehicle being used in connection with the execution of the said works or any public service or utility vehicle;
 - anything done with the permission or at the direction of a police officer in uniform or a civil enforcement officer; or
 - any vehicle being used for Police, fire brigade or ambulance purposes.
- Any vehicle waiting in contravention of any restriction imposed by the Order may be removed under the provisions of the Removal and Disposal of Vehicles Regulations 1986.

Nick O'Donnell
 Assistant Director - Traffic and Engineering
 Civic Centre, 44 York St, Twickenham, TW1 3BZ
 Dated 12 December 2024



STATUTORY

NOTICE OF INJUNCTION ORDER

On 22nd November 2024 Mr Justice Freedman in the High Court of Justice in Claim No. KB-2024-003315, granted an interim Injunction Order (the Order) to the London Borough of Richmond upon Thames (the Council), pursuant to Section 222 of the Local Government Act 1972 and Section 187B of the Town and Country Planning Act 1990.

The Order prohibits Persons Unknown:-

- from forming an unauthorised encampment or entering to occupy for residential purposes; or
- depositing waste;

at any of the following sites:

(1) Ham Lands; (2) Ham Riverside Drive Open Space; (3) Ham Riverside pitches; (4) Kew Green; (5) Old Deer Park; (6) Richmond Green; (7) Ham Common; and (8) King George's Field.

NOTICE IS HEREBY GIVEN THAT the Court will consider the Council's application for a final injunction at the Royal Courts of Justice, Strand, London WC2A 2LL on Thursday 13th February 2025. (The Judge and the exact time of the hearing will be published in the High Court Cause List the working day before the hearing).

Copies of the Court Proceedings are available for inspection at the Council's offices at Civic Centre, 44 York Street, Twickenham TW1 3BZ and on the Council's website at https://www.richmond.gov.uk/services/parks_and_open_spaces/parks_improvements_and_conservation/latest_parks_updates.

The Council's solicitors are: South London Legal Partnership, 160 Grosvenor Terrace, London Road, Morden SM4 5DX (Reference: M67/LEO/BB/037/198)

Paul Chadwick, Executive Director of Environment & Community Services
 London Borough of Richmond upon Thames

PROBATE & Trustee

Eileen Patricia Willis (Deceased)

Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the aforementioned deceased, should apply to the Probate Registry, 1100 Strand, London WC2R 2LS, on or before 10th January 2025, in order to be able to present their claims and interests to the undersigned on or before two months and one day from the date of this publication, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.

As the Willis Executor for the estate,
 C/O J. S. WOODHEAD & CO. SOLICITORS
 PO BOX 3584, NORWICH, NR7 7ND.

What are Public Notices?

Public notices are adverts placed by councils and other local authorities to inform people of developments in their areas. They can cover a wide variety of topics that may impact your life.

DORIS MARY EDITH POCOCK (Deceased)

Notice is hereby given that the will of the late Doris Mary Edith Pocock, who died on 15th October 2024, was proved in the High Court of Justice in the County of London on 15th November 2024. The will is dated 15th October 2024 and contains the following provisions: The residue of the estate is to be divided equally among the children and issue of which they are: Colin Raymond Neale, PO Box 3584, Norwich, NR7 7ND (REF:SSP00000)

JAMES PHILIP TORNGE

Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the late James Philip Torng, who died on 29th October 2024, must apply to the undersigned on or before 10th January 2025, in order to be able to present their claims and interests to the undersigned on or before two months and one day from the date of this publication, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.

Robert Goodrich
 c/o Wansell & Richardson

LONDON BOROUGH OF RICHMOND UPON THAMES

The Council has received the following applications t ONLINE at www.richmond.gov.uk/planning; at the Civic Centre. Enquiries can only be dealt with at the Civic Centre. preferred option, however if you wish to email your view your correspondence to envprotection@richmond.gov.uk in respect of planning applications (e.g. documents made available for inspection by the public on the Council's website) that you do not want placed on the web site. We will

24/2529/FUL 50 Station Road Hampton TW12 2DA	Outbuilding (refurbishment) Reason for advertisement (Affecting Conservation Area)
24/2988/VRC 21 - 23 Queens Road Richmond	Variation of planning permission 23/1623/FUL - Condition 2 of appeal decision L5810/W/23/33336E minor material change of the approved side
24/3003/HOT 23 Gloucester Road Kew Richmond TW9 3BS	Reason for advertisement (Affecting Conservation Area) Alterations to existing including reinstatement of decorative features
24/2987/HOT 43 Victoria Road Mortlake London SW14 8EX	Reason for advertisement (Affecting Conservation Area) Replacement of the existing storey pitched roof with a new pitched roof introduction of two new main roofscapes, and of Upvc windows will

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
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WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF22

This is the exhibit marked "YF22" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

From: Samuel Hick
Sent: 20 December 2024 16:03
To: 'fft@gypsy-traveller.org'
Cc: Byron Britton
Subject: [File=337/196] KB-2024-003315 The Mayor and Burgesses of the London Borough of Richmond upon Thames -v- Persons Unknown

Categories: Saved in Visualfiles

Dear Sirs,

We represent the London Borough of Richmond (the Council) in the above matter.

On 22 November 2024 Mr Justice Freedman in the High Court of Justice in Claim No. KB-2024-003315, granted an interim Injunction Order (the Order) to the Council, pursuant to Section 222 of the Local Government Act 1972 and Section 187B of the Town and Country Planning Act 1990.

The Order prohibits Persons Unknown: -

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- b. depositing waste

at any of the following sites:

1. Ham Lands; (2) Ham Riverside Drive Open Space; (3) Ham Riverside Pitches; (4) Kew Green; (5) Old Deer Park; (6) Richmond Green; (7) Ham Common; and (8) King George's Field.

In accordance with the undertaking given to the Court by the Claimant and recorded within the Order, we now enclose via the below link, by way of service upon you, a copy of the Order and a full set of papers relating to this claim.

<https://uk2.safedrop.com/sd/o9xbR5lyhANZvaulEdILxypC8Mpf6xyOTb8cFaKCRQE=>

Please note we are awaiting a copy of a transcript of the judgment of Mr Justice Freedman and will provide a copy to you upon receipt. Please advise of the email address to which the transcript should be sent if different from the one used to send this email.

Please note that the Court will consider the Council's application for a final injunction at the Royal Courts of Justice, Strand, London, WC2A 2LL on Thursday 13 February 2025.

If you require a hard copy of the Order and papers, do please let us know.

Yours faithfully,

Sam Hick

Legal Assistant

Dispute Resolution & Compliance Team

Housing · Debt · Litigation · Enforcement · Licensing

South London Legal Partnership

Merton Civic Centre, London Road, Morden, SM4 5DX

DX 161030 Morden 3

Direct: 020 8545 4468

Mobile: 07827 552748

We are hiring - <https://join-sllp.com/all-roles>



South London Legal Partnership

SLLP is the in-house legal service of the Boroughs of
KINGSTON MERTON RICHMOND SUTTON WANDSWORTH

From: Samuel Hick
Sent: 20 December 2024 16:05
To: 'info@londongandt.org.uk'
Cc: Byron Britton
Subject: [File=337/196] KB-2024-003315 The Mayor and Burgesses of the London Borough of Richmond upon Thames -v- Persons Unknown

Categories: Saved in Visualfiles

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Please note we are awaiting a copy of a transcript of the judgment of Mr Justice Freedman and will provide a copy to you upon receipt. Please advise of the email address to which the transcript should be sent if different from the one used to send this email.

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If you require a hard copy of the Order and papers, do please let us know.

Yours faithfully,

Sam Hick

Legal Assistant

Dispute Resolution & Compliance Team

Housing · Debt · Litigation · Enforcement · Licensing

South London Legal Partnership

Merton Civic Centre, London Road, Morden, SM4 5DX

DX 161030 Morden 3

Direct: 020 8545 4468

Mobile: 07827 552748

We are hiring - <https://join-sllp.com/all-roles>



South London Legal Partnership

SLLP is the in-house legal service of the Boroughs of
KINGSTON MERTON RICHMOND SUTTON WANDSWORTH

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
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LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF23

This is the exhibit marked "YF23" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

London Borough of Richmond upon Thames Guidance Procedures for Unauthorised Encampments

1. Introduction

This guidance document has been drafted in response to an increased number of unauthorised encampments in the London Borough of Richmond upon Thames in recent years. The aim of this guidance is to address the need for an effective approach to the management of unauthorised encampments on London Borough of Richmond upon Thames land, whilst ensuring that the rights of the council's local settled community and the gypsy and traveller communities are balanced.

This document provides a step-by-step practical guide to the use of the powers available to the police, the local authority and other landowners to ensure any unauthorised encampment is handled in the most appropriate manner for all stakeholders and sets out, if required, what the formal process for eviction may be and the responsible officers across the council.

This document also sets out advice on how communications regarding unauthorised encampments are handled, what happens after an encampment (particularly with regards to any clean up exercises) and information on preventing further instances of unauthorised camping.

2. London Borough of Richmond upon Thames Unauthorised Encampment Policy Statement

The Council accepts that individuals and communities have the right to choose a nomadic lifestyle and that it is not part of the local authority's role to discourage it. An existing traveller site in the London Borough of Richmond upon Thames is provided at **Pigeon Lane, Hampton**. The Council also recognises that individuals may encamp on land due to homelessness and other causes, and that this sector of the community may have specific needs.

All communities and individuals, however, have responsibilities to comply with the law and an adoption of a nomadic lifestyle does not exempt communities and individuals from causing nuisance or harm to others which may occur from unauthorised encampments on public land.

If the Council decides that eviction is the appropriate course of action this will be undertaken expeditiously within the law and with respect to the rights and needs of the travellers and any individuals encamping on public land within the borough.

3. Unauthorised Encampments and Homelessness

Unauthorised encampments are defined by the Government as "encampments of caravans and/or other vehicles on land without the landowner or occupier's consent and constituting trespass".

Unauthorised encampments fall into 2 main categories; those on land owned by the local authority (public highway, public parks/open spaces, schools, council housing land etc) and those on privately owned land. If an unauthorised encampment occurs on land owned by the local authority, the Council has a power, not a duty, to move them on.

For the purposes of this guidance document, only those homeless individuals that constitute rough sleepers are included. Rough sleepers are defined for the purposes of rough sleeping counts and estimates as:

- People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments)
- People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations or 'bashes')

The Council has a duty of care to ensure that vulnerable people receive the assistance they require, therefore it is essential that all persons identified as rough sleeping are engaged with and provided with assistance.

During the engagement process, the **Council's Officers and/or Agencies** will visit the persons identified as rough sleeping daily ensuring that they are engaging with local homelessness charities and remain fully compliant with the Council's Byelaws and Public Space Protection Orders. Any failure to comply with the Council's Byelaws and Public Space Protection Orders will result in appropriate enforcement action and subsequent eviction from land belonging to the Council.

4. Handling Unauthorised Encampment Procedure

As soon as the council becomes aware of an unauthorised encampment, details are forwarded to the **Council's Community Safety Team and/or the Police**. The location of the encampment will ultimately determine which Council department leads on the overall management of the unauthorised encampment, potential eviction and clean-up operation.

An Officer in the **Council's Community Safety Team will be designated as Lead Officer**. The Lead Officer is responsible for coordinating any assessments of the encampment, enforcement actions and associated communications.

Council Contacts

- **Highways (public highways): Street Scene Enforcement**
sse@richmondandwandsworth.gov.uk
- **Parks Team**
parks@richmondandwandsworth.gov.uk
- **Legal Services – South London Legal Partnership**
slip@merton.gov.uk
- **Corporate Property Services**
PropertyServicesTeam@richmondandwandsworth.gov.uk
- **Animal Welfare**
HousingRegenerationDepartment@richmondandwandsworth.gov.uk
- **Safeguarding Team: Children's Services**
spa.referrals@achievingforchildren.org.uk
0208 547 5008 (out of hours 0208 770 5000)
- **Communications Team**
Communications@richmondandwandsworth.gov.uk

Other Key Contacts

- **Richmond Police – Chris Jackson, Community Inspector**
Christopher.Jackson@met.police.uk
- **Parks Patrol Contractor (Parkguard) – Joe Lazone, Contract Manager**
joe@parkguard.co.uk
- **RHP Housing (housing land) – Caroline Hand, Head of Community Services**
Caroline.Hand@rhp.org.uk
- **Bailiffs - Equivo**
020 7788 8484

Stage 1 – Verification of Encampment		
	Task	Owner
1a	Council receives notification of an unauthorised encampment, details circulated amongst default Lead Officers to ascertain whose area (if not known by the Contact Centre and/or Careline).	Community Safety Team
1b	Confirm land ownership and location of encampment (liaise with Corporate Property if required).	Community Safety Team
1c	In the case of Council owned/maintained land Lead Officer will arrange necessary Council Officers, Police and/or Agencies to attend site, carry out necessary welfare assessments and appropriate referrals.	Community Safety Team, Police, Agencies
1d	Council Officers, the Police and/or Agencies will serve the Public Spaces Injunction if the land is included in the injunctions definitive site list. A notice will be served on the encampment (each vehicle, motor home, caravan etc.) as soon as practicable. In the case that the land is not included in the injunctions definitive site list, all relevant information will be passed to the Council’s Legal Services who will apply to the Magistrates Court for a court summons.	Community Safety Team, Police, Agencies
1e	Consolidate all information relating to encampment and liaise with relevant Head of Service on most appropriate course of action.	Community Safety Team
1f	Draft briefing note and circulate to the Communications Team and relevant members and stakeholders.	Community Safety Team, Communications Team

4.1 Communications

As soon as the Council becomes aware of an unauthorised encampment, the **Community Safety Team** will liaise with the Council’s Communications Team for reactive responses to enquires. **The Community Safety Team** will ensure ward councillors and other relevant members are briefed and arrangements are made to inform residents and key stakeholders, of the actions the council will be or has taken by website updates, social media and email notifications.

Stage 2 – Welfare management and site security		
Task		Owner
2a	Assess traveller welfare needs.	Community Safety Team, Police, Agencies
2b	Assess any safeguarding issues and any urgent welfare issues on site.	Community Safety Team, Police, Agencies
2c	Assess any animal welfare issues.	Community Safety Team, Police, Agencies
2d	Conduct a site risk assessment for encampment e.g. number of caravans and inhabitants, aggressive individuals, dangerous animals on site etc. and notify relevant departments to secure where practicable.	Community Safety Team and/or Police
2e	Conduct site risk assessment for users e.g. damage to equipment, waste on site etc. and notify relevant departments to secure where practicable	Community Safety Team and/or Police

4.2 Assessment Enquiries and Welfare Needs

Following notification of an unauthorised encampment, the Lead Officer will arrange for the following enquiries to be made; individual welfare assessment(s) on as many of the individuals from the encampment as possible, site assessment(s) on the area being encamped and community impact assessment on the local environment. In addition, a copy of the Council's Public Spaces Injunction giving notice of unauthorised occupation will be presented to each vehicle and/or individual on site.

Local authorities have obligations to all people within their boundaries, which include duties towards children, to provide healthcare and other welfare support and to assist homeless people. These duties also apply to travelling communities and rough sleepers. Officers should conduct thorough welfare enquiries as required by Government Guidance on Managing Unauthorised Encampments.

The purpose of these enquiries is to gain information to assist with decision making as to whether to move towards eviction, and to ascertain whether there are humanitarian, welfare or legal reasons why the encampment should not be evicted. Should the assessments reveal any issues, the Lead Officer must ensure appropriate referrals are made to health services, social services, house departments and so on.

The number of Council Officers, **Agencies** and Enforcement attending will be kept to a minimum, to reduce the potential for antagonism. Council Officers on site will ensure a consistent approach is taken with regards to the collection of information and undertaking of necessary assessments. Council Officers will maintain contact with the Police and/or **Agencies** to co-ordinate intelligence and arrange for additional Police support if necessary.

Stage 3 – Eviction		
Task		Owner
3a	Liaise with Legal Team as soon as encampment is verified, for relevant documents to be drafted if required.	Community Safety Team, Legal Team
3b	If decision is taken to evict and the land is included in the injunctions definitive site list – Council Officers, the Police and/or Parks Patrol Contractor will serve the Public Spaces Injunction on the encampment (each	Community Safety Team, Police, Agencies

	vehicle, motor home, caravan etc.) as soon as practicable. Notice of Directions (section 77) to encampment, evidence notice of direction on all vehicles (and occupants where practicable).	
3c	If the land is not included in the injunctions definitive site list – the Lead Officer will provide the Councils Legal Team with all necessary documentation and instruct Legal Team to apply to request a Court Summons for hearing.	Community Safety Team, Legal Team
3d	Serve Notice of Summons to the encampment – Legal Team to attend Magistrates Court if encampment does not leave within 24 hours of service.	Community Safety Team, Legal Team, Police and/or Agencies
3e	Serve Removal Order (section 78 of Criminal Justice and Public Order Act) requiring the encampment to vacate within 24 hours.	Community Safety Team, Legal Team, Police and/or Agencies
3f	If breach of Byelaws has taken place, issue Byelaw notice that gives the encampment 2 hours to vacate site.	Community Safety Team, Legal Team, Police and/or Agencies
3g	If the encampment does not leave after 3e/3f, the Lead Officer and Legal Team will enlist Bailiffs for forceable removal with appropriate enforcement support.	Community Safety Team, Legal Team, Police and/or Agencies
3h	Ensure the Communications Team, relevant stakeholders and members are updated throughout engagement and eviction process.	Community Safety Team

4.3 Making the Decision to Evict or Negotiate End of Encampment

The Council will consider only relevant matters and the decision whether to evict an unauthorised encampment will be made with recognition of humanitarian considerations. The relevant matters when dealing with unauthorised encampments are; the nuisance being caused, the steps the Council can take to minimise the nuisance, the needs to recover the land and the needs of the members of unauthorised encampment. The decision to evict will be made by the relevant Head of Service in conjunction with the relevant Director if required, in the light of all the information obtained by officer(s) carrying out welfare enquiries and other officers where applicable.

5. Private Land

Landowners have rights under the Common Law and Civil Procedure Rules. Part 55 of Civil Procedure Rules allows any landowner to regain possession of his/her land. There is often an assumption that the local authority and/or the Police will intervene with unauthorised encampments and rough sleepers from private land, however this is not usually the case. Where unauthorised encampments occur on privately owned land, the landowner is responsible for managing the encampment and any evictions. The Council can act in an advisory capacity at the request of the landowner.

6. Legal Considerations

For the purpose of this guidance document, the powers can be broadly defined as being the Council's common law power as a landowner or statutory power under section 77 of the Criminal

Justice and Public Order Act 1994 (CJPOA), however other powers are available to the Council and the Police, and each eviction will be assessed on the relevant issues in each encampment to ensure the most appropriate course of action is taken.

When deciding to initiate legal proceedings, the Council must have regard to its duties under s.149 Equality Act 2010. Irish Travellers are an ethnic group which are protected by the Equalities Act. The Council must be satisfied that the decision to initiate legal proceedings is in pursuit of a legitimate aim and is a necessary and proportionate action to take.

The Council must ensure that the proper procedures in dealing with an unauthorised encampment are followed, there has been full compliance with Human Rights legislation, proper welfare enquiries have been undertaken, where necessary appropriate agencies engaged, and that all actions are fully documented, and the decision made is lawful, reasonable, balanced and proportionate. Additionally, the Council needs to ensure that should also prepare carefully for court appearances, making sure that evidence/court papers etc are in order, and that all legal requirements (such as serving notices) have been met.

6.1 Criminal Justice and Public Order Act 1994 (CJPOA)

This act sets out a two-stage procedure for securing the removal of travellers from land. The first stage is to serve a direction under section 77 of the Act. This direction requires persons residing in vehicles on land to leave the land and take their belongings with them. The Direction is served on the unauthorised campers by a local authority Officer (the document must be given directly to one of the named unauthorised campers or affixed prominently to one of the vehicles).

Failure to leave the land as directed is a criminal offence as is returning to the land within three months of a direction being given, and the campers may be arrested by the police. If the travellers fail to leave the land as directed, the Council may apply to the Magistrate's Court for a Removal Order under Section 78 of the Act, allowing the council to remove the travellers, and take such steps as necessary to secure their removal. Enforcement of the order is the responsibility of the Council.

6.2 Police Powers Under Section 61 of the CJPOA

Only the Police have access to powers under Section 61 of the CJPOA, and where applied can lead to eviction in a much shorter timescale than under sections 77-78. The Council however, will work with the Police on all unauthorised encampments to reach a decision on the best course of action. In relation to a Section 61, after notification of an unauthorised encampment, the main task of any visiting police officers is to establish whether Section 61 can legally be applied.

6.2.1 Anti-social behaviour or public disorder

In the circumstances where significant anti-social behaviour or public disorder is taking place, or it is considered that there is a significant risk of this, the Council may consider requesting that the police support the Council's dealings with these issues directly using their wider powers, and for them to disperse the encampment using S61 or S62A. It is a police decision whether to use a S61 or S62A of the CJPOA.

6.3 Repeated unauthorised encampments

Where groups of travellers repeatedly return to a specific location, sections 61-62 and 77-78 can be used to prevent them returning to that location for a period of three months. It may also be

appropriate to explore further options such as injunctions or Anti-Social Behaviour Orders to ban individuals from entering specific areas of the borough or from engaging in certain activities.

7. Eviction

The legal steps involved in evicting any unauthorised encampment are detailed in the Stage 3 table above. In relation to all evictions, the **Community Safety Team** will ensure that:

- There has been liaison with local Police regarding the date and time of eviction;
- Other land-owning departments are aware of the need to increase security;
- Key stakeholders are advised of the date and time of eviction;
- Tow vehicles (with tow bars) have been arranged;
- Bailiffs (if necessary) have been arranged;
- Arrangements have been made for the storage of any vehicles or caravans which must be removed from the site;
- Necessary works are arranged to repair any damage that has been caused to the land or that would allow further access, and additional security measures are identified and if possible implemented;
- Clean up operation has been arranged to take place as soon as possible after eviction;
- Photographs, if not already taken, are taken to show the condition of the site at the time of the eviction
- Data on the encampment, including all vehicles, inhabitants, associated costs and any other relevant information is located and saved in appropriate file.

7.1 Post Eviction and Preventing Further Unauthorised Camping

The Council regularly review security arrangements at key sites to deter unauthorised vehicle access. Site protection measures are continually reviewed in locations which are particularly vulnerable to unauthorised camping, for instance creating earth bunds, installing barriers etc.

The London Borough of Richmond upon Thames has a vast Parks and Open Spaces estate and public areas must continue to give access to residents and visitors and also to emergency and maintenance vehicles. They must also give easy access for disabled people, so no site can be fully secure. In extreme circumstances the council will review as required whether any wider prevention would be beneficial to the local community and physical landscape of the park or open space to deter future unauthorised traveller encampments. Any review will need to take into account the ongoing cost and practicality of any solution offered in light of the ongoing access required for emergency, maintenance and event vehicles, which could include putting up new fences, making ditches or banks or resurfacing the land.

Protecting all vulnerable sites during such periods when an unauthorised encampment is in the area would require the provision of 24-hour security and temporary barriers for up to 2 days over a vast Parks and Open Spaces estate consisting of more than 130 sites across the Borough. Access by legitimate users and maintenance and emergency vehicles would also be severely curtailed. Providing a 'lock-down' on all open spaces during this time is therefore impractical and unaffordable. Managing unauthorised encampments as and when they occur and taking necessary legal proceedings to evict campers is a more effective and cost-efficient solution.

As soon as the Council becomes aware of an unauthorised encampment, the Council's relevant Grounds Maintenance and Waste and Recycling Contractors should be notified, to clear waste and

litter. In each case, the **Community Safety Team** should arrange for any required clear up to be carried out as soon as practicable after an encampment has vacated by issuing the necessary clearance instructions and arrange for any internal recharges to be made.

Police Process

Often the expectation of the local community and key stakeholders is that the Police will perform the eviction using Section 61 powers, however the mere presence of an encampment without any aggravating factors will not mean that the Police will use these eviction powers. In these cases, then simple trespass powers are more appropriate to be used by the landowner or Section 77 powers by the local authority.

Section 61 is not a mandatory power. The Police may use it where two or more people have entered the land (land does not include highways) as trespassers with the common purpose to reside on the land. If this is the case one or more of the following conditions must be in place before the Police will exercise their powers under Section 61:

- Damage has been caused to land or property, or
- Threats, abusive words, or behaviour have been directed at the landowner, their agent or family, or
- There are six or more vehicles (vehicles include motor vehicles and caravans) on the land at the time the Senior Officer attends to serve the notice.

And

- One or more of the following aggravating factors apply:
 1. Local amenities are deprived to communities.
This could include, for example, forming an encampment on any part of a recreation ground, public park, school field etc.
 2. There is local disruption to the economy
This could include forming an encampment on a shopping centre car park or in an industrial estate if this results in the loss of use of the land for its normal purpose.
 3. There is other significant disruption to the local community
This could include other behaviour that is directly related to those present at an encampment is so significant that a prompt eviction by police becomes necessary.
 4. There is a need to take preventative action
This could include where a group of trespassers have persistently displayed anti-social behaviour at previous sites, and it is reasonably believed that such behaviour will be displayed at this newly established site.

On receipt of information in relation to an unauthorised encampment, the following actions will be completed by the SW(W) Duty Officer, Callsign SW2.

- Arrange for an initial site visit and risk assessment to be completed by an officer of the rank of Sergeant or above, ensuring that national police guidance is followed, including issuing the code of conduct in relation to behaviour.

- Liaise directly with relevant partners to follow the actions as agreed, ensuring that lead officers are identified, and initial actions are agreed.
- Completion of the unauthorised encampments incident management log (IML), to ensure that actions are delivered to a consistent level of service to the community and partners.
- Ensure that an initial review period is agreed with partners, and communications strategy agreed between all lead officers.
- Arrange handover to either oncoming SW(W) duty officer, or to Safer Neighbourhood Team (SNT) supervisor responsible for the geographical footprint of Richmond Borough, of the encampment to progress during rostered hours.
- Ensure handover as appropriate between SNT/ERPT if encampment is protracted to maintain SPOC for partners/community and ensure that monitoring/review is ongoing and recorded within IML.

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
AND SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990**

B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
UPON THAMES**

Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
temporary occupation) WITH OR WITHOUT VEHICLES ON ANY OF THE
8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
THAMES LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 8 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES
LISTED ON SCHEDULE 1 ATTACHED TO THIS CLAIM**

Defendant

EXHIBIT YF25

This is the exhibit marked "YF25" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

From: Kate Gordon <Kate.Gordon@london.gov.uk>
Sent: 20 January 2025 12:47
To: Joanne Capper
Subject: RE: Negotiated Stopping Protocol for GRT Community

You don't often get email from kate.gordon@london.gov.uk. [Learn why this is important](#)
Official

Hi Joanne

Thanks for your message.

We commissioned London Gypsies and Travellers and De Montfort University to carry out some research (at <https://www.londongypsiesandtravellers.org.uk/news/2019/12/04/new-lgt-report-on-negotiated-stopping-in-london/>). LGT also commissioned some work on supporting local authorities and other public landowners to implement negotiated stopping, so may be able to advise on a protocol.

I understand that Enfield has pursued this approach, and may be willing to share its protocol.

I hope this is helpful.

Kate

Kate Gordon
Principal Strategic Planner
London Plan Team
Greater London Authority
Union Street, London SE1 0LL

london.gov.uk/what-we-do/planning/london-plan
kate.gordon@london.gov.uk

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From: Joanne Capper <Joanne.Capper@richmondandwandsworth.gov.uk>
Sent: Friday, January 17, 2025 8:52 AM
To: Kate Gordon <Kate.Gordon@london.gov.uk>
Subject: Negotiated Stopping Protocol for GRT Community

Official

Hi Kate,

I hope you don't mind me contacting you direct. I am looking for someone at the GLA who can help me with an update on the Mayor's approach to unauthorised encampments.

I am working with my colleagues dealing with our parks and open spaces. In response to a number of unauthorised encampments, the London Borough of Richmond upon Thames has been seeking a permanent injunction for some of our parks and open spaces to expedite the removal of such encampments. (Background details at

https://www.richmond.gov.uk/news/news_august_2024/update_on_unauthorised_encampment_in_ham)

The London Plan 2021 referenced that research on negotiated stopping was underway, and there was a Mayor's Question Time in 2022 which set out that a Negotiated Stopping Protocol was being looked at on a London-wide basis.

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/negotiated-stopping-protocol-grt-community>

I am just wondering if there is any update on this issue?

Please let me know if I need to ask a colleague. I can give you a call if its easier to discuss over the phone.

Many thanks,

Joanne Capper

Principal Policy and Information Planner
Serving Richmond and Wandsworth Councils

☎: 020 8891 7321 | ✉: Joanne.Capper@richmondandwandsworth.gov.uk | 🌐: www.richmond.gov.uk | www.wandsworth.gov.uk

Please note the views expressed in this email are informal, based on the information provided and do not prejudice any decision the Councils may make on any future application which may be submitted in respect of the above.



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IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
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B E T W E E N:

**THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND
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Claimant

And

**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT
AND/OR OCCUPYING FOR RESIDENTIAL PURPOSES (including
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8 SITES WITHIN THE LONDON BOROUGH OF RICHMOND UPON
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Defendant

EXHIBIT YF24

This is the exhibit marked "YF24" as referred to in the Witness Statement Yvonne Feehan dated 29 January 2025

Dated 29 January 2025

Traveller Caravan Welfare Form

Caravan make, model, colour, registration	<input type="text"/>
Associated vehicle(s) description	<input type="text"/>
Family group name(s)	<input type="text"/>
Verbal abuse or threatening behaviour	<input type="text"/>
Number of loose dogs and number of other animals	<input type="text"/>
What type(s) of work do they do?	<input type="text"/>
Do the travellers have any special reason to be encamped on your land?	<input type="text"/>
How long do they intend to stay?	<input type="text"/>

Demographics

Number of adults?	<input type="text" value="0"/>
Number of pregnant women?	<input type="text" value="0"/>
Number of children?	<input type="text" value="0"/>
Number of children 0-2 years?	<input type="text" value="0"/>
Number of children 3-5 years?	<input type="text" value="0"/>
Number of children 6-16 years?	<input type="text" value="0"/>
Number of elderly adults 60+ years?	<input type="text" value="0"/>
Are the family known to social services?	<input type="checkbox"/>
Anyone receiving any immediate current medical treatment?	<input type="checkbox"/>
Medical treatment/GP details	<input type="text"/>
Ethnic Origin	<input type="text"/>

Education

Save Form

Number of children of school age

Schools attended

If not at school, are they receiving education on site?

Have the Education Services for Travelling Children been notified?

Date of Education Services notification

Do any of the children have special needs?

Special needs details

Any additional observations, notes, issues

Save & Close Form

