

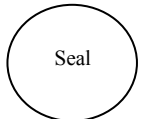
Application for Injunction (General Form)

Name of Court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No.
Claimant's Name and Ref. THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES Ref 337/196	
Defendant's Name and Ref. (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 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	
Fee Account no. PBA 0077352	

Notes on completion

Tick which boxes apply and specify the legislation where appropriate

- By application in pending proceedings
- Under Statutory provision
- This application is made under Part 8 of the Civil Procedure Rules



This application raises issues under the Human Rights Act 1998

Yes No

(1) Enter the full name of the person making the application

The Claimant ⁽¹⁾ **The Mayor and Burgesses of the London Borough of Richmond upon Thames**

applies to the court for an injunction order in the following terms:

(2) Enter the full name of the person the injunction is to be directed to

The Defendants ⁽²⁾ **PERSONS UNKNOWN AS IDENTIFIED IN THE TITLE TO THIS CLAIM.**

(3) Set out here the proposed terms of the injunction order (if the defendant is a limited company delete the wording in brackets and insert 'whether by its servants, agents, officers or otherwise').

IT IS ORDERED THAT THE FIRST DEFENDANT

- (1) is prohibited from forming an unauthorised encampment on any of the 8 sites within the London Borough of Richmond upon Thames listed in Schedule 1 to this Order and shown edged red on the maps attached hereto marked Schedule 2 without the express written permission of the Claimant as Landowner.
- (2) is prohibited from entering to occupy for residential purposes any of the 8 sites within the London Borough of Richmond upon Thames listed in Schedule 1 to this Order and shown edged in red on the maps attached

The court office at

is open between 10am and 4pm Mon - Fri. When corresponding with the court, please address all forms and letters to the Court Manager and quote the claim number.

N16A General form of application for injunction (05.14)

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hereto marked Schedule 2 without the express written permission of the Claimant as Landowner.

IT IS ORDERED THAT THE SECOND DEFENDANT

(3) is prohibited from depositing waste on any of the 8 sites within the London Borough of Richmond upon Thames listed in Schedule 1 to this Order and edged in red on the maps attached hereto marked Schedule 2 without the express written permission of the Claimant as Landowner.

(4) Set out any proposed orders requiring acts to be done. Delete if no mandatory order is sought.

~~And that~~ (4)

(5) Set out here any further terms asked for including provision for costs

The Order remain in force until the hearing of the Part 8 Claim

Costs Reserved

(6) Set out here the name of the person giving evidence in support of the application.

The grounds of this application are set out in the written evidence of (6)

(1) Yvonne Feehan dated

This written evidence is served with this application.

(7) Enter the full name and address for service and delete as required

This application is to be personally served upon (7) **the Defendants.**

(8) Enter the full name and address of the Claimant

This application is filed by (8) **The South London Legal Partnership, Merton Civic Centre, London Road, Morden, SM4 5DX**

Signed



Dated 18 September 2024

Name and address of the person application is directed to

To*

This section to be completed by the court

**This application will be heard by the Judge
at
on the day of 20 at o'clock**

If you do not attend at the time shown the court may make an injunction order in your absence
If you do not fully understand this application you should go to a Solicitor, Legal Advice Centre or a Citizens' Advice Bureau

N244

Application notice

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

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

Name of court High Court of Justice King's Bench Division	Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)
PBA 0077352	H W F - [] - []
Warrant no. (if applicable)	
Claimant's name (including ref.) The Mayor and Burgesses of the London Borough of Richmond upon Thames Ref. 337/196	
Defendant's name (including ref.) (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 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	
Date	18 September 2024

1. What is your name or, if you are a legal

South London Legal Partnership

representative, the name of your firm?

2. Are you a

Claimant

Defendant

Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

The Claimant

3. V

1. Applying pursuant to CPR 6.15(1) for an order that the Claimant may be permitted to serve the Part 8 Claim Form on the intended Defendants by an alternative method and at an alternative place.

2. Applying pursuant to CPR 6.27 for an order that the Claimant may be permitted to serve the Particulars of Claim, N16A Application for Injunction and supporting evidence, Notice of Hearing and Order for alternative service, on the intended Defendants by an alternative method and at an alternative place.

The reason for the application is because in respect of personal service, this would ordinarily be achieved on an individual in accordance with CPR 6.5. However, in respect of the proposed Defendants, it is impossible to personally serve on a Person Unknown. It is therefore necessary to seek an order from the Court to adopt an alternative method and alternative place for service.

The procedure is provided for under CPR 8.2A(1)

4. Have you attached a draft of the order you are applying for?

Yes

No

5. How do you want to have this application dealt with?

at a hearing

without a hearing

at a remote hearing

Hours

Minutes

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?

Yes

No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Without Notice

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

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

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

If necessary, please continue on a separate sheet.

1. It is necessary to seek an injunction to prevent Persons Unknown entering into and setting up unlawful encampments on the 8 sites that the Claimant seeks to protect in the London Borough of Richmond upon Thames by way of an injunction.
2. As Persons Unknown, it is impossible to know who and where to serve the Defendants. There would only be limited benefit in seeking an injunction against Persons Unknown if the Claimant was not in a position to serve the Claim or subsequent Orders.
3. The Claimant proposes serving the Defendants by the posting of copies of the Order for Alternative Service, the Claim Form, Particulars of Claim, N16A Application for Injunction and supporting evidence, and any Notice of Hearing (the "Court Documents") in the following ways:
 - (a) affixing a copy of the Court Proceedings in a transparent envelope to a post in a prominent position or on a gate at the entrance to the 8 sites listed on Schedule 1 attached to the Claim;
 - (b) publishing a copy of the Court Proceedings on the Claimant's website;
 - (c) publishing details of the Claim and where to access the Claim Documents in the Richmond and Twickenham Times;
 - (d) making a copy of the Court Proceedings available at the front desks of the Claimant's offices.
4. It is believed that by the serving the Court Documents as aforesaid, the Defendants will have good notice of the nature of the proceedings and can if they so wish defend the Claim and oppose the injunctive relief that the Claimant seeks.
5. I believe that by serving in the ways described there is more than a reasonable expectation that Persons Unknown will become aware of the proceedings.
6. This Application is made pursuant to CPR 8.2A(1) and CPR 6.15 and 6.27.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

I **believe** that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature

John Scarborough

Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

18

Month

09

Year

2024

Full name

John Scarborough

Name of applicant's legal representative's firm

South London Legal Partnership

If signing on behalf of firm or company give position or office held

Managing Director

Applicant's address to which documents should be sent.

Building and street

Merton Civic Centre

Second line of address

London Road

Town or city

Morden

County (optional)

London

Postcode

S M 4 5 D X

If applicable

Phone number

020 8545 4568

Fax phone number

DX number

161030 Morden 3

Your Ref.

337/196

Email

Samuel.hick@merton.gov.uk ; David.fellows@merton.gov.uk



Claim Form (CPR Part 8)

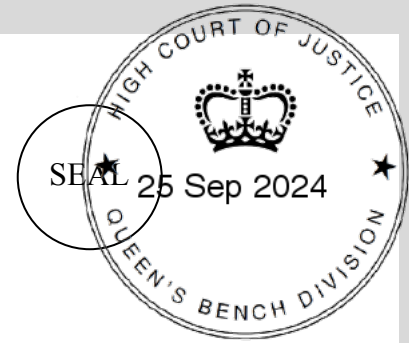
In the HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

	<i>for court use only</i>
Claim No.	
Fee Account No.	PBA 0077352
Help with Fees Ref No. (if applicable)	HWF-□□□-□□□

Claimant

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

South London Legal Partnership,
Merton Civic Centre,
London Road,
Morden,
SM4 5DX
Defendant(s)



KB-2024-003315

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

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

Details of claim *(see also overleaf)*

- The Claimant seeks an interim and final injunction pursuant to Section 222 of the Local Government Act 1972 and / or Section 187B of the Town and Country Planning Act 1990.

Defendant's
name and
address

**PERSONS UNKNOWN
(who have unlawfully
encamped in the London
Borough of Richmond upon
Thames)**

	£
Court Fee	626
Legal representative's costs	TBC
Issue Date	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number

Details of claim (continued)

2. The Claimant owns and / or is responsible for the management of the Parks, Sports Fields, Leisure Areas, Woodland Areas and Open Spaces ("the Green Spaces") in the London Borough of Richmond upon Thames ("the Borough").
3. In total there are 131 locations that the Claimant has identified as needing protection.
4. There have been numerous incidents of unauthorised encampments and the depositing of waste, including the fly-tipping of commercial waste in the Borough resulting in considerable inconvenience and expense. The Claimant fears further unauthorised encampments on the locations within the Borough.
5. These unauthorised encampments include large groups of Travellers with up to 30-50 people and 20-30 vehicles, mobile homes and caravans. There are also a number of dogs.
6. The unauthorised encampments have been established on the locations, all of which belong to the Claimant.
7. The Claimant maintains that the unauthorised occupancy and establishment of the encampments is disruptive and has a harmful impact. It causes health and safety concerns. The harm this could cause to the residents of the Borough, among other members of the public, is significant. The health risks to the residents include:
 - a) human and animal excrement left in the Green Spaces from those establishing the encampments;
 - b) domestic waste strewn over the land;
 - c) fire hazards caused by the use of propane gas cylinders in public spaces;
 - d) fly-tipping domestic and commercial scale waste, including green vegetation, building materials, glass, asbestos, rubble and soil;
 - e) driving of vehicles over and across Parks, Recreational Areas, Woodland Areas.
8. The unauthorised encampments cause considerable disruption to the residents and visitors of the Borough. In addition, the encampments have an adverse impact on local businesses which is detrimental to the Borough's future development.
9. The fly-tipping causes considerable distress and anxiety and results in recreational facilities being un-usable.
10. Further considerable expense is incurred in the cleaning up operations, including the removal of untreated human and dog excrement, domestic litter, general waste, gas cylinders and building waste, including hard core and soil.
11. The unauthorised encampments also cause considerable expense to be incurred in restoring the sites to a fit, hygienic and safe level for usage by the public. Further costs are incurred in attempting to secure the sites owned by the Claimant.
12. Since September 2019, unknown persons have formed at least 16 encampments on the Claimant's land within the Borough.
13. Dealing with these unauthorised encampments through the procedures available under Sections 61, 77 and 78 of the Criminal Justice and Public Order Act 1994 ("the 1994 Act")

is unsatisfactory. These are reactionary steps addressing the problem after the encampments have been established and after the fly-tipping and land damage has taken place.

14. Further reliance upon Sections 77 and 78 of the 1994 Act only leads to the encampments moving from one site to the next and has not deterred the Defendants from forming these encampments within the Borough.
15. The procedures under the 1994 Act have not acted as a significant enough deterrent and it is not uncommon that immediately following the clearance of an unauthorised encampment, another one is set-up. On some occasions the unlawful occupiers have returned to a location that has been the subject of earlier clearance and removal.
16. Obviously, commencing possession proceedings takes place. This involves considerable amount of work and expenses and tends to take between 7 and 14 days before the Order for Possession is obtained. In that time considerable damage to the Site may have arisen and serious waste depositing occurred.
17. Accordingly, it is necessary and expedient for the promotion and / or protection of the interest of the residents of the Borough to prevent nuisance and trespass and further breaches of planning control to seek an injunction in the terms of the draft Order attached to this Claim at 8 specified sites; namely
 - (1) Ham Lands;
 - (2) Ham Riverside Drive Open Space;
 - (3) Ham Riverside Pitches;
 - (4) Kew Green;
 - (5) Old Deed Park;
 - (6) Richmond Green;
 - (7) Ham Common; and
 - (8) King George's Field.
18. An injunction will prevent the repeated establishment of unauthorised encampments and the disruption and loss of resources caused by this type of unlawful action.
19. It is necessary to bring these proceedings against the Defendants named in the heading as the Claimant is not aware of the names of any Persons Unknown as any name which is provided are often found to be false names. Further there may be newcomers that the Claimant is not aware of and newcomers who they have no knowledge of but who become a defendant as a result of the activity described in the heading to the Claim Form.
20. The proposed Order is intended to prevent any future unauthorised encampments on the Green Spaces being established by the Persons Unknown as described in the heading.
21. The proposed Order against the Defendants is confined in scope to the 8 specified Sites within the Borough edged in red on the maps attached marked Schedule 2 to this Claim. This is not a blanket coverage as many other areas of land in the Borough are not to be the subject of protection.
22. The Claimant is not inviting occupation of the remaining 123 locations in the Borough.

AND the Claimant seeks

As Against the First Defendant

- (1) An injunction prohibiting the First Defendant from forming an unauthorised encampment on any of the 8 sites within the Borough of Richmond-upon-Thames listed on Schedule 1 attached to this Order and shown edged red on the maps attached hereto in the Schedule marked 2 without the express written permission of the Claimant as Landowner.
- (2) An injunction prohibiting the First Defendant entering to occupy for residential purposes any of the 8 sites within the Borough of Richmond-upon-Thames listed on Schedule 1 attached to this Order and shown edged in red on the maps attached marked Schedule 2 without the express written permission of the Claimant as Landowner.

As Against the Second Defendant

- (3) An injunction prohibiting the Second Defendant depositing waste on any of the 8 sites within the Borough of Richmond-upon-Thames listed on Schedule 1 attached to this Order and edged in red on the 8 maps attached hereto in the Schedule marked "2" without the express written permission of the Claimant as Landowner.
- (4) Such further and other relief

STEVEN WOOLF

Dated this 18th day of September 2024

Statement of Truth

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.

I believe that the facts stated in these Particulars of Claim are true

The Claimant believes that the facts stated in these Particulars of Claim are true. I am authorised by the Claimant to sign this statement

Signature

John Scarborough

- Claimant
 Litigation Friend (where claimant is a child or Protected Party)
 Claimant's Legal Representative (as defined by CPR 2.3(1))

Date

Day

18

Month

09

Year

2024

Full Name

John Scarborough

Name of Claimant's legal representative firm

South London Legal Partnership

If signing on behalf of firm or company give position or office held

Managing Director

South London Legal Partnership,
Merton Civic Centre,
London Road,
Morden,
SM4 5DX

DX 161030 Morden 3

Claimant's or claimant's legal representative's address to which documents or payments should be sent if different from overleaf including (if appropriate) details of DX, fax or e-mail.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

KB-2024-003315

BEFORE THE HONOURABLE MR JUSTICE BOURNE

BETWEEN:

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



-and-

KB-2024-003315

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

Defendants

UPON the Claimant's application issued on 25 September 2024 for an interim injunction

AND UPON the order of Martin Spencer J dated 22 October 2024 permitting alternative service

AND UPON the Claimant's application notice dated 29 October 2024 for this matter to be listed for a hearing

IT IS ORDERED:

1. The Claimant's application for an interim injunction will be listed for a hearing, on notice to the defendants, on 19 November 2024 with a time estimate of 1 day.
2. For the avoidance of doubt, this order may be served on the Defendants pursuant to CPR 6.27 by the means specified in the order of Martin Spencer J dated 22 October 2024, i.e. by:
 - (a) affixing a copy of this order in a transparent envelope to a post in a prominent position or on a gate at the entrance to the 8 sites listed on Schedule 1 attached to the Claim;
 - (b) publishing a copy of this order on the Claimant's website;
 - (c) publishing details of this order in the Richmond and Twickenham Times;
 - (d) making a copy of this order available at the front desk of the Claimant's offices at Civic Centre, 44 York Street, Twickenham TW1 3BZ.
3. Costs reserved.
4. This Order has been made without notice. Any person affected by this Order may apply, within 7 days of service upon them, to vary or set aside this Order.

Dated this 1st day of November 2024

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

The Honourable Mr Justice Martin Spencer

22 October 2024



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 / 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 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 TO THIS CLAIM**

Defendants

AMENDED ORDER FOR ALTERNATIVE SERVICE

AND UPON READING THE Application Notice dated 21 October 2024 to amend the Order dated 16th October 2024 for alternative service of the Claim Form, Particulars of Claim, N16A Application for Injunction and supporting evidence upon the unidentified Persons Unknown Defendants

IT IS ORDERED THAT

1. The Claimant have permission to serve the Claim Form, Particulars of Claim, N16A Application for Injunction and supporting evidence (hereinafter referred to as “the Court Proceedings”) on the Defendants pursuant to CPR 6.15(1) and CPR 6.27. The alternative method and alternative place for service is by the alternative methods set out at sub-paragraphs (a) - (d) below
 - (a) affixing a copy of the Court Proceedings in a transparent envelope to a post in a prominent position or on a gate at the entrance to the 8 sites listed on Schedule 1 attached to the Claim;
 - (b) publishing a copy of the Court Proceedings on the Claimant's website;
 - (c) publishing details of the Claim and where to access the Claim Documents in the Richmond and Twickenham Times;
 - (d) making a copy of the Court Proceedings available at the front desk of the Claimant's offices at Civic Centre, 44 York Street, Twickenham TW1 3BZ.
2. The Claimant also have permission to serve this Order for Alternative Service on the Defendants and any Notice of Hearing pursuant to CPR 6.27 by the above means.
3. Pursuant to CPR 16.5(4), the date on which the Claim Form:
 - 3.1 is to be deemed served by the Claimant on the Defendants is upon compliance with paragraphs 1 (a)-(d) of this Order;
 - 3.2 the period for filing an Acknowledgement of Service, is 14 days after compliance with paragraphs 1 (a)-(d) of this Order
4. This Order has been made without notice. Any person affected by this Order may apply, within 7 days of service upon them, to vary or set aside this Order.

COMMUNICATIONS WITH THE COURT AND THE CLAIMANT'S SOLICITORS

All communications with the Court about this Order should be sent to Room WG08, Royal Courts of Justice, Strand, London, WC2A 2LL (020 7947 6010)

All communications with the Claimant's Solicitors to be
Address: South London Legal Partnership, Merton Civic Centre, London Road,
Morden, Surrey, SM4 5DX. DX 161030 Morden 3
Tel No. 0208 8545 4568

E-mail at byron.britton@merton.gov.uk ; Samuel.hick@merton.gov.uk

Reference 337/196

Name: Yvonne Feehan
Date: 17 September 2024
Statement No.: 1
Exhibits: "YF1" - "YF7"

IN THE HIGH COURT OF JUSTICE

Claim No. KB-2024-

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

WITNESS STATEMENT OF YVONNE FEEHAN

I, YVONNE FEEHAN of 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:

Preliminary:

1. I make this witness statement in support of the Application before this Honourable Court brought by the London Borough of Richmond upon Thames ("the Council") for an Injunction in the terms of the draft Order that I have been shown. In particular, an injunction against the First Defendant that:

- (i) they be forbidden from setting up an encampment within the boundaries of any of the 8 sites within the London Borough of Richmond upon Thames listed on Schedule 1 to this Order and shown edged in red on the maps attached marked Schedule 2 to this Order, without the express written permission of the Claimant, as Landowner.
- (ii) they be forbidden from entering or occupying for residential purposes any of the 8 sites within the London Borough of Richmond upon Thames listed on Schedule 1 to this Order and shown edged in red on the maps attached marked Schedule 2 to this Order, without the express written permission of the Claimant, as Landowner.

and against the Second Defendant that:

- (iii) they be forbidden from depositing waste on any of the 8 sites within the London Borough of Richmond upon Thames listed on Schedule 1 to this Order and shown edged in red on the maps attached marked Schedule 2 to this Order, without the express written permission of the Claimant, as Landowner.

2. I believe that the facts stated in this Witness Statement being verified 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.

3. By this application the Council hopes to address, problems it has experienced in recent years and in particular over the last two years since the ending of travel restrictions associated with the Covid Pandemic namely the unlawful establishment of encampments either for the purposes of residential occupation with mobile homes or caravans and / or the unlawful use of land within the London Borough of Richmond upon Thames (the Borough) for the depositing of waste.

4. I can confirm that when considering the making of this application I have had in mind Section 222 of the Local Government Act 1972 and have satisfied myself that the application is in the interests of the residents and other persons that frequent the Borough. I have had in mind a number of factors, including financial and environmental. I have also been very aware of the importance of community cohesion and mutual respect and how important it residents and other persons have confidence in the Borough, its management and operation.

Personal Background:

5. In my role as Park Services Manager I am responsible for delivering an effective front-line service for the Green Spaces, which comprise Parks, Open Spaces, Sports Facilities, Playgrounds, Nature Reserves and Woodland Areas (the Green Spaces”) within the Borough. My duties are aimed at providing clean and safe parks, estates and other open spaces throughout the Borough. In addition, I am charged with raising public awareness and promoting the use of Green Spaces.

6. As part of my duties, I am responsible for the effective management in dealing with unauthorised encampments. This involves addressing the problem in so far as it relates to the land owned and occupied by the Council. This part of my job description regularly brings me into contact with other agencies such as the Council’s Shared Legal Service, the South London Legal Partnership, (the SLLP), other council departments, the Police, Councillors, Members of Parliament, other private land owners and concerned residents and businesses.

7. By working in co-operation with other interested agencies, it is hoped that we might minimise the adverse impact of unauthorised encampment on the local community. I do so by liaising with community groups and residents, including vulnerable people, ensuring clear communication and support throughout the process.

8. I have 24 staff immediately under my authority and indirectly manage up to 3 consultant staff on a regular basis. In due course I intend to set out in greater detail the work I and my team carry out in the event that an unauthorised encampment is established, but in summary we are required to attend sites and serve notices, assess welfare issues, liaise with the Police, gather evidence for potential prosecutions or other enforcement action, attend court and attend sites to supervise evictions. We also are main point of contact for councillors and the public. We therefore deal with significant volumes of enquiries and complaints during the period of an unauthorised encampment. Only once a site has been cleared of the Travellers, can my team look to assess any damage caused to the land or property by the occupants and ensure the site is secured, cleaned of all manner of waste and to restore the site to use for the benefit of the residents of the Borough and others, from outside the Borough, who lawfully seek to use the Council's Green Spaces.

The Borough

9. The London Borough of Richmond upon Thames is a borough on the outskirts of south-west London to the east of the London Borough of Wandsworth, south of the London Borough of Hounslow and north-east of the Royal Borough of Kingston upon Thames. The Borough covers an area of 5,095 hectares (14,591 acres) and is the only London Borough to span both sides of the River Thames. It has a population of just over 200,000. There are a dozen towns and villages in the Borough with the largest being the main towns of Richmond and Twickenham.
10. I now have produced and shown to me marked "YF1" an exhibit comprising a map showing the entire Borough the edged reding. Within the Borough there are 131 sites under the Council's ownership or management, and which are identified by the Council as potentially requiring protection. These include green spaces, ecological sites, cemeteries, Council controlled car parks and highway verges. The 131 sites are listed in the Schedule which forms part of the Exhibit "YF2" referred to below.

The Application

11. As I will explain later in this statement, the Borough has for a number of years been visited by Persons Unknown setting up encampments on various Green

Spaces around the Borough. This has caused my team and I to initiate numerous court proceedings under sections 77 and 78 of the Criminal Justice and Public Order Act 1994 (1994 Act) to move unauthorised encampments from Borough land. The police are regularly involved and occasionally have considered using their powers under Section 61 of 1994 Act. It is unfortunate that neither of these actions has had the effect of stopping, or reducing, the instances of unauthorised encampments within the Borough.

12. As a result of careful review and discussion with my team, together with the elected Councillors, we have come to the considered view that the time has come to seek an injunction to prevent the unlawful encampments and the adverse consequences that the creation of such encampments causes even if it is ultimately for just a few days. It should not be thought that this application for an injunction seeks to protect all the Green Spaces within the Borough. This is not the case. The application is not a blanket application, but rather it focuses on those Green Spaces that have been occupied in recent times and those which are most sensitive to an encampment and which have the greatest effect on the residents and visitors to the Borough.
13. I understand that if the Court is minded to grant an injunction, it will be on an interim basis in the first place and only at a fuller hearing will the court consider a final order. This means that different considerations apply, but as I will explain I do believe an interim injunction followed by a final order is in the best interests of the Borough.

The Green Spaces within the Borough and those to be Protected

14. Of the 131 sites within the Brough, many are not considered vulnerable to an unauthorised encampment or the depositing of waste. This is because they are either too small or have very restricted access. It is our experience that no unlawful encampment, or waste depositing, has ever taken place on such ground. Also, many of the 131 sites, which may be vulnerable to an unlawful encampment are not as sensitive nor as heavily used by the local Community, so it is considered that there is less of a need to ensure they are protected by way of an injunction.
15. However, the same cannot be said for 8 specified sites within the 131 sites which, after careful consideration, are believed to require preventative protection by way

of an injunction. It is my belief, and that of my colleagues, that these 8 sites are particularly vulnerable to encampments and/or waste depositing and that unless protected by the proposed preventative injunction, there is a real possibility that they will be unlawfully occupied and/or have waste deposited or fly-tipped upon them, causing particular damage to the environment and the spaces within the local Community used by residents and lawful visitors to the Borough.

16. There is now produced and shown to me marked “**YF2**” an exhibit that includes a Schedule, listing all 131 the green spaces within the Borough. Those sites have been placed into two categories. The 8 individual sites named in red text which are considered to be the most vulnerable sites. The remaining sites named in black text are vulnerable, but not as vulnerable as the sites identified in red.

17. As the Court will appreciate from the Application, the draft order and my evidence herein, it is only the 8 most vulnerable sites that this application seeks to protect by way of a preventative injunction. Immediately following the Schedule of 131 sites in Exhibit “**YF2**” I have produced 8 individual maps showing the specific locations of the sites the Council seeks protected, edged in red, in their immediate vicinity. The Court will consider each of the 8 sites but I trust will consider them in the context of:
 - (i) whether the sites have environmental sensitivities.
 - (ii) whether the sites are valued by the local people and managed and maintained by volunteers.
 - (iii) whether the sites have been the subject of previous unlawful encampments and waste depositing.
 - (iv) whether the sites are prominent, open and in regular use such that unauthorised occupation would cause considerable disruption.

18. I set out below additional information that applies to the 8 specified sites. It will be noted that all of these sites are close to residential areas:-
 - (i) Site 1: Ham Lands,

Ham Lands is a 72-hectare Local Nature Reserve and Site of Metropolitan Importance for Nature Conservation in Ham within the Borough. Lying adjacent to the River Thames, this Local Nature Reserve has a mixture of habitats ranging from woodland to wetland. Ham Lands are very popular with horse riders, dog walkers and nature lovers, as they contain a diverse number of plants and animals.

(ii) Site 2 - Ham Riverside Drive Open Space

The Ham Riverside Drive site contains an open space with grass area for ball games, an orchard and a good size playground with equipment for children of all ages.

(ii) Site 3 - Ham Riverside Pitches

Ham Riverside Pitches is an open field of amenity grassland next to the River Thames in Ham and close to Ham House and Garden, (owned by the National Trust) predominantly used for sport and informal recreation. The site is adjacent to the large nature conservation area of Ham Lands and is enclosed by posts and a low barrier gate on the boundary with Ham Street.

(iv) Site 4 - Kew Green

Kew Green is a large open space in Kew. It is roughly triangular in shape and its open grassland, framed by broadleaf trees, extends to around 30 acres, including Kew Pond. It is overlooked by a mixture of period townhouses, historic buildings and commercial establishments. It is effectively a village green and is a popular area for community and sporting events, including cricket. It is enjoyed by walkers and wildlife enthusiasts, particularly for its various water birds at Kew Pond.

(v) Site 5: Old Deer Park

This is an area of open space used as a leisure centre located within Old Deer Park. The site is protected by fencing, barriers, and posts. The site contains an open space with grass area for ball games, a good size junior and infant play area with a wheelchair accessible roundabout and spinner bowl, tennis courts and an Adizone outdoor gym. It is considered that this site is particularly vulnerable as it is located very close to the A316.

(vi) Site 6: Richmond Green

Richmond Green is an important recreation area near the centre of Richmond, a town of about 20,000 inhabitants. The Green is a venue for various festivities throughout the year, including the May Fair. There is also a cricket pitch for keen players of the sport. Many old houses, the central library and the famous Richmond Theatre surround the Green, and the remnants of Richmond Palace can be seen on one side.

(vii) Site 7: Ham Common

The development of Ham Common dates from at least the 17th century, associated with the building of Ham House and the laying out of its landscape. The history of this area is also linked with the enclosure of Richmond Park by King Charles I. The Common is a popular local recreational amenity within the Borough, listing a well-utilised cricket pitch and large duck pond. Ham Pond is the Common's focal point, and it dates back to when horses were watered on the Common. Nowadays the pond attracts children and parents who enjoy feeding the ducks. Community events and cricket matches are often played in the summer.

(vi) Site 8: King George's Field

Taking its name from the King George V Trust, which made funds available for local authorities to purchase land for use as sports fields in the 1930s, this park is used for a number of sports throughout the year.

Facilities include:

- Car parking
- Changing rooms
- Two cricket pitches
- Three full-sized football pitches
- Four tennis courts

19. Of course, by this Application and identifying the most sensitive and vulnerable sites, the Council are not inviting unauthorised encampments and waste depositing on the remaining sites, but we are recognising that the other sites are less sensitive.

20. It should not be thought that as there is no transit site in the Borough for Travellers and there is no negotiated stopping policy in place, the Council does not take its Public Sector Equality Duty, set out in Section 149 of the Equality Act 2010, very seriously. We give due regard to all ethnic groups, including Gypsies and Travellers, when delivering and developing our services, including through considering the health, care and wellbeing needs of the Gypsy and Traveller communities within the Public Health Joint Strategic Needs Assessment. We also routinely offer welfare and safeguarding checks to Travellers in unauthorised encampments and when made aware of specific needs refer onwards to the relevant services. The enquiries are designed to obtain information in order that the Council can better provide for the needs of the Travellers. It is however our experience that the Travellers are usually disinclined to provide any information and are reluctant to co-operate.
21. If the information provided was such that it was obvious that tolerating an encampment for a short period of time, for example because there is pregnant women amongst them, a decision to permit the continued occupation for a limited time can be made.
22. The Council must however balance these responsibilities with those its holds to the wider community to protect public space, prevent damage to council-owned property and uphold the Public Space Protection Order (PSPO) made by the Council under Section 59 of the Anti-social behaviour, Crime and Policing Act 2014, as well as local bye-laws. We believe that we strike an appropriate balance in our actions and our communications on the matter.
23. In short we always exercise patience and tolerate non-disruptive short-term occupancy and have, even done so on the 8 specified sites that this application seeks to protect going forward.

The Historic Injunctions

24. Before addressing the Application and proposed injunctive relief sought, I should point out, that this is not the first Injunction of this type that the Council have sought. In March 2019 an injunction to prevent the unlawful occupation and the depositing of waste on the 131 green spaces and associated land was successfully applied

for. That Injunction remained as an interim Order due to awaited decisions from the Court of Appeal in respect of similar proceedings.

25. The interim injunction obtained in 2019 operated throughout 2019 and most of 2020. However, it was then one of the actions that came to be heard initially by His Lordship Mr. Justice Nicklin in a combined action known as London Borough of Barking v Persons Unknown [2021] EWHC 1201 (QB) and then by the Appeal Court in the same named case, reference [2022] EWCA Civ 13.
26. The original first instance decision of Nicklin J. made injunctions of the type that the Council had obtained in March 2019 unlawful, due to their reach over newcomers. However, the Council was one of several local authorities that successfully appealed that decision to the Court of Appeal. The Court of Appeal, subject to some important observations, confirmed that injunctions against Persons Unknown, including those unknown persons who have not yet been served are lawful and can be pursued if the circumstances allow. These injunctions can be used to prevent acts of nuisance and trespass, and breaches of planning control on public held land. Subsequently, the matter came before the Supreme Court and in a judgment handed down on 29 November 2023 upheld the earlier decision of the Court of Appeal and confirmed that the courts do have the power to grant “newcomer” injunctions against persons unknown.

Need for a new Injunction

27. Because of that identified risk, we have concluded that unless the Council takes the preventative measures of protecting the vulnerable and sensitive sites within the Borough, there is a distinct possibility that these sites will continue to be used and be damaged and not be able to be used by others for periods during the year.
28. It is imperative for the benefit of the residents of the Borough and other local users of the Green Spaces, that an injunction in the terms of that shown to me and which forms part of the Claim Form, is granted. In the absence of such an injunction, the disturbances of the past where green spaces have become unusable and the financial consequences of having to address these actions, will result in disquiet amongst the community within the Borough, and involve considerable sums of Council money having to be expended in order to address the problem. I am sure the Court will appreciate that this money would be better used to enhance the

quality of life of the residents and visitors into the Borough. The amounts per encampment are set out in an exhibit to which I shall shortly refer.

29. I should emphasise that this application is not intended to single out any one particular group, however it would not be credible if I did not observe that people from the Travelling Community are most likely to be affected by the injunctive relief being sought. I am aware of the fact that Travellers are from a nationally recognised ethnicity and have their own distinct identity and culture. I am therefore aware of the importance of treating the Travellers' needs with respect and dignity. I am especially aware of any potential conflicts between the way of life of Travellers and the need to uphold their rights under the Human Rights Act and the need to balance this with the laws of the land, the PSPO and local bye-laws and the rights and entitlements of the local residents affected by Traveller movements. After all, the land that the Council is seeking to protect with this preventative injunction is designated public land, intended for the greater benefit of the people of the Borough and lawful visitors.
30. As part of the assessment between the Gypsy and Traveller way of life and the needs of the rest of the Borough, its residents and visitors, it is inevitable that financial factors have to be taken into account, particularly in these times of austerity and high demand on local authority budgets. As I shall endeavour to explain the cost involved in restoring land, which has been the subject of an encampment, whether involving fly-tipping or not, can be extremely significant and can have a long-term detriment to the community in terms of budget restrictions for other programmes and responsibilities that fall within the Council's remit. In addition, the time involved in recovering land is lost, when officers and other agencies would be better engaged in advancing positives in the Borough.
31. It is with that balance in mind that I, together with assistance from colleagues at the Council, have completed an Equality Impact & Needs Analysis (the Analysis), a copy of which is produced and shown to me marked "YF3". As can be seen the Analysis has taken into account the harm and adverse effect that unlawful encampments and fly-tipping has on the Borough and its residents in both financial (pure monetary terms) and non-financial (such as community relations and anti-social behaviour) terms and balanced that with an assessment of the welfare and occupation needs of Persons Unknown. The Analysis makes amongst other things the following conclusions at its Summary section:

- (i) The Council has considered the adverse impact of its proposed action on this protected group.
- (ii) The Council is mindful that the family life of an individual seeking to occupy Council land without authorisation of the Council can be disrupted as a consequence of the proposed action. This may include disruption to the general well-being of those in the group for the reasons set out above however the Council has a protocol which sets out the steps it will take to deal with unauthorised encampments and includes the actions the Council will take to mitigate against the adverse impact of its actions in the form of the Welfare Needs Assessments. The possible outcomes of which include signposting to appropriate services.
- (iii) Overall, after careful assessment and consideration of the different factors, the Council is satisfied that it is appropriate to bring these proceedings to secure a preventative injunction to protect a limited number (8) sites in the Borough.

32. I have come to the conclusion that the risks to the rights of the Persons Unknown have been identified and mitigated and that the decision to proceed with this application is proportionate and appropriate in all the circumstances.

33. Of course, it is recognised that even if the Court were to grant the injunction sought, there may be occasions in the future when persons come onto the 8 sites and establish an encampment. These persons will be treated no differently and the procedures that the Council will adopt will be precisely the same, as if they occupied any of the other sites in Richmond not protected by an injunction. The reason for the injunction is to attempt to prevent occupancy in the first place. The hope is that by identifying the 8 most vulnerable and sensitive sites and ensuring notices are placed on all the fences and gates, any person or group of people seeking to occupy green spaces in the Borough, will not occupy those 8 sites, but go elsewhere.

Why an Injunction

34. This proposed application for an injunction therefore has to recognise that it is based upon our concerns and nervousness arising out of historic experiences and awareness that without injunctive protection there is a very strong likelihood of

encampments being established, with all the adverse consequences that flow from their creation.

35. What I believe will be useful for the purposes of this injunction is to understand the incidents and consider specific evidence of damage caused when unlawful activity takes place on Council owned land. As can be seen from exhibit "YF4" the incidents relate to the 5 years prior to the making of this application.
36. I produce a bundle of photographs exhibited at "YF5" showing the extent of the occupation on various sites since 2019 and the devastating effect some of these visits have had on the Green Spaces within the Borough. It will be appreciated that the unauthorised encampments by Travellers into the Green Spaces is indiscriminate. This has a wide impact upon the quality of life of all persons in the Borough and those lawfully using the Green Spaces.
37. It will be appreciated that the biggest problem associated with encampments is fly-tipping and waste. This is obviously a source of considerable pollution and danger to the public. The harm will depend upon the content of the waste, but in addition to household waste, green waste can be devastating as it causes an imbalance in the fauna and flora.
38. In addition to fly-tipping and waste regularly left on sites of unlawful encampments, physical damage to property is often caused. This arises because it is not uncommon for forced entry to be gained onto sites through gates and barriers, using power tools and vehicles. There has been an increase in the disregard for physical property as the Council seeks to secure, the occupiers think of more "ingenious" ways to overcome whatever security measures are put in place. Photographs exhibited to "YF5" show the damage caused to an entrance gate to Ham Playing Field in August this year.
39. Complaints of noise and nuisance and anti-social behaviour (ASB) are regularly received. The encampments are in residential areas, close to houses and it is therefore not surprising that noise and nuisance and ASB would arise where dozens of vehicles and people descend on an otherwise quiet area. Numerous complaints are received from local residents when encampments are set up on the Green Spaces. Some are obviously more serious and more disturbing than others. One particularly disturbing example was when we were advised that ducklings were being mistreated and of waste, including human waste being thrown into a pond in August at Ham Common in July this year.

40. I now have produced and shown to me marked Exhibit “**YF6**” a number of examples of the type of complaints we have received over the last five years. As will be seen these documents have been redacted to prevent the complainant’s identities and contact details coming into the public domain.
41. The cost to the Council can be considerable. There are obviously the direct clear up costs and costs to repair damaged property that can involve many thousands of pounds. However, the indirect costs are often as significant. The Council suffers a significant indirect loss whilst officers deal with the encampments. The hours that dealing with an encampment can never be recovered and it means that other requirements and tasks of those officers for the better performance/ management of the Council are lost. Attending sites, to carry out welfare checks involves many hours. After the encampment moves on it is not uncommon for council contractors to spend days clearing up after the unauthorised encampment.
42. I should add that in addition to the costs associated with Council staff having to clear up the waste and undertake restoration work, there is a further loss being incurred by the Borough. Whilst an encampment is present there is additional costs incurred to the Council to engaged additional staff from our enforcement contractors, Park Guard, as well as bailiff/High Court Enforcement Officer costs when required which can often amount to tens of thousands of pounds. This arises because the time spent on clearing up after the encampments are vacated means that these staff cannot spend time on their other maintenance duties in other areas. Unfortunately, in order to meet its obligations across the Borough, staff are often spread thinner than we would like. Occasionally it has been necessary to engage agency staff at high costs as well as our own staff on an overtime basis. It is very important that we do not lose sight of other Green Spaces because general littering does inevitably take place and this of itself can be hazardous to park users, especially children. If they are not checked on a daily basis a serious accident could occur. The additional costs to the Council are set out in the schedule of costs from historic encampments exhibited at “**YF4**”.
43. In addition to the time spent at the encampment during and after its occupation, the officers have to spend many hours preparing legal documents, including witness statements and then serving at the site. The Council officers are sadly quite experienced in such matters but it still requires careful preparation to ensure all the evidence required is presented to the court enabling it to grant a possession order. There are also hundreds of emails from councillors and concerned members of the public to deal with. The Council also has to engage solicitors and counsel for the

court hearing. It is rare that encampments go before the legal teams get involved. Legal and Enforcement costs in securing possession orders and enforcing possession are often well over £20,000. Indeed, the most recent Traveller encampments in late July and August this year of Ham Common and Kings George's Field resulted in total costs in excess of £40,000 in each case.

44. The following information relates to the particular sites and their most recent encampments.

Ham Lands, Ham Riverside Drive and Ham Riverside Pitches

- (a) 14 May 2020, Ham Riverside was visited upon by 7 caravans and at least 10 other vehicles. Due to the lockdown measures resulting from the coronavirus outbreak, there was a substantial delay in issuing an application for an injunction against the Travellers on the site. The Travellers remained on site for 21 days before being evicted on 4 June 2020, when their ASB escalated, and an injunction was served with the support of Bailiffs.
- (b) 19 June 2020, Ham Lands was visited upon by two vehicles which gained access via an entrance from Riverside Drive. The encampment remained for 1 day after being served a copy of the Council's injunction from Council Officers and Parks Patrol Contractor (Parkguard).
- (c) 03 March 2021, Riverside Drive Open Space was visited upon by at least 4 caravans and 4 vehicles. The encampment remained for 1 day after being served a copy of the Council's injunction from Council Officers and Parks Patrol Contractor (Parkguard).
- (d) 27 August 2021, Ham Riverside Pitches was visited upon by at least 3 caravans. The encampment remained for 4 days until the Council served a Removal Direction (Section 77 of the 1994 Act).

Kew Green

- (a) 08 June 2019, a single caravan towed by a vehicle arrived and left within hours and no costs were incurred by the Council.

- (b) 25 May 2021, 14 caravans and 12 other vehicles formed an encampment and remained for 7 days. The Travellers only moved on after a possession order was granted and enforced.
- (c) 4 August 2021, 9 caravans and 9 other vehicles formed an encampment remained for 3 days. The Travellers moved off after the Council served a High Court Order for Possession.
- (d) 01 August 2022, at least 7 caravans and 11 other vehicles established an encampment. When I attended the site, I was not able to identify the precise number of people in occupation, but I witnessed 18 persons, as well as 14 children and 4 dogs.

The SLLP was instructed to recover possession but fortunately, proceedings did not need to be pursued as the Travellers left of their own accord. However, the Court may be interested to read the various e-mails received at the time from local residents and businesses complaining about this latest occupancy which are set out in Exhibit “YF6”.

- (e) 18 April 2023 10 caravans and associated vehicles and approximately 35-40 persons, including 4 children under the age of 5 and a heavily pregnant woman set up an encampment. The usual welfare enquiries were organised but none of the Travellers wished to engage with the process.
A possession order was subsequently obtained and enforced. However, no sooner had the occupiers vacated Kew Green than they returned just four weeks later.
- (f) 16 May 2023, the Council’s Parkguard service reported that the site subject to an encampment by persons unknown, with 4 caravans, and 9 cars were identified. Further vehicles arrived, together with a large group of at least 20, but possibly more people. At least one of the vehicles on site had the same vehicle registration number as that which had occupied the site from 18 April 2023.

The April 2023 possession proceedings were resurrected and a further possession order was obtained. Unfortunately the pattern described above was repeated again, when the Travellers, this time numbering around 50 people, accompanied by at least 9 caravans and 17 vehicles (cars and vans) re-occupied Kew Green see (g) below.

- (g) 02 June 2023, at least 15 Caravans and as many supporting vehicles formed an encampment on the site. It remained for 4 days and left on the evening of 05 June 2023 on their own accord. This followed an increased Police presence and prior to being served a Removal Direction (section 77 of the 1994 Act). Persons from this encampment had been witnessed by members of public baiting and hunting wildfowl in the nearby Kew Pond with dogs.

Old Deer Park (incl. Pools on the Park)

- (a) 07 January 2019, 6 Caravans, a Motor Home and 10 vehicles formed an encampment which remained for 3 days until served with a Removal Direction by the Council (Section 77 of the 1994 Act).
- (b) 12 July 2019, 8 caravans and 13 vehicles formed an encampment. The group left on their own accord the following day.
- (c) 21 April 2021, a single caravan stayed for 1 day after being served a copy of the Council's injunction by Council Officers and Parks Patrol Contractor (Parkguard).

Richmond Green

- (a) 13 September 2023, a significant convoy of vehicles and caravans (between 20-30 vehicles in total) formed an encampment. The behaviour from the Travellers was anti-social and volatile and the Police moved them on the following day.

Ham Common

- (a) Evening Friday 26 July 2024, a significant number of vehicles, caravans and individuals, arrived and quickly establish an encampment. Council Officers attended on Saturday morning, and counted at least 16 cars, 21 vans and 20 caravans, together with over 100 adults and children, and 8 loose dogs.

This increased to 40 caravans, and approximately 32 vans and 16 cars – difficult to be accurate due to constant vehicle movements on and off site.

01 August 2024 the Council was granted an urgent possession order and the Group were evicted the same day under a Writ of Possession enforced by High Court Enforcement Officers (HCEOs), Parkguard, together with assistance from the Police.

The Group were followed out of the area, but half of the Group gained illegal entry onto Hampton Court Green (Royal Palace land). Having been blocked in by staff, and after negotiation with staff/the Police the Group were forced to leave the site. They then set up an encampment at the Hawker Centre in Ham (which is within the Royal Borough of Kingston upon Thames).

Exhibit “YF5” contains photographs of this encampment.

King George’s Field

- (a) 05 August 2024, having been evicted from the Hawker Centre, as detailed above, the same group that were on Ham Common at the end of July 2024 returned to the Borough.

By illegally removing concrete posts they gained access onto the site and 40 caravans, 32 vans, 16 cars (+ 2 vehicles and tent at Ham Riverside Drive) established an encampment.

09 August 2024 the Council again secured an urgent possession order and the Group were evicted under a Writ of Possession issued and executed by HCEOs, with Parkguard and assistance from the Police. The Group then moved to Woking according to the Council’s Contract Manager who lives in Woking and recognised the Group.

Exhibit “YF5” contains photographs of this encampment.

Identity of the Defendants and Service of Proceedings

45. It is impossible to identify with any certainty the persons who have in the past, and are therefore likely in the future, to occupy land belonging to the Council and which

needs protecting by injunction. This is because we still do not have reliable information as to the identities of those involved, as the names they may have provided in the past to officers who have attended them to conduct welfare enquiries, are not believed to be truthful. It is not uncommon to be given clearly fictitious names, such as Mickey Mouse when undertaking welfare checks or site assessments. More often than not, as I shall illustrate, they do not engage and no names are given. There are also many other potential unlawful occupiers who we have absolutely no knowledge of at all, who might wish to occupy land in the Borough.

46. Many of those involved in making up the unlawful encampments know very well how the system works, how long it will take to obtain a court order and that bailiffs/HCEOs will need to be instructed to enforce the order. It is often the case that the encampment will stay and only leave once it knows the court order has been obtained. Officers are commonly informed that the encampment will remain for as long as it can.
47. It is for that reason why the proposed Defendants to this Application are stated as set out in the title to the Claim shown at the header to this Statement and on the remainder of the paperwork, including the draft Order.
48. As this Court will appreciate the proposed Defendants are described very specifically. This description is intended to be in accordance with the judicial guidance that has been handed down in relation to persons unknown injunctions. I am advised that it is appropriate to refer to unknown persons in the way described in the heading as we do not have reliable information as to the identities of those people who have occupied the Green Spaces in the past and of course we are keen to prevent unknown persons doing so in the future.

What happens when a Camp is Established and the Interaction with the Gypsy/Traveller Community?

49. New encampments are first discovered either by notification from local residents. This is because the unauthorised encampments almost always take place at night and most often over the weekend. The first sign is often a broken lock or where there is no gate or lock, the actual visualisation of a camp.
50. A camp is commonly made up of anything between 10 and 50 vehicles with caravans, but it is not uncommon that there are even more, particularly as many

vehicles can be towing vehicles and trucks. Examples of particularly large camps can be seen from the photographs in Exhibit "YF5".

51. Upon discovering that a camp has been set up, I am usually one of the first persons to be notified. The first thing I do is re-organise the park staff's routine plans for the location as no park maintenance, including park cleansing can proceed whilst an encampment is in situ. This is because of the dangers associated with attending a site; not just the possible risk of an assault or worse but because of the dangerous and hazardous materials that are brought onto site.
52. I then look to notify the senior management within the Council and the Borough's Police Duty Inspector. The Police have commonly been very sympathetic and assist as much as they can, but their resources are spread thin and they have not been able to offer a great deal of assistance. The Police have rarely exercised their powers under section 61 of the 1994 Act to direct Travellers to leave a site.
53. If I am able, I will attend at the site as soon as practicable alongside our Park Enforcement Contractors, Parkguard. This I do in order to carry out an inspection of the land and try and engage with the Travellers so as to find out what their plans are. In particular, we are always keen to discover why they were in the Borough and when they intend to move on. In line with our usual practice we will always seek to carry out a Welfare Assessment to enable us to establish whether there are any vulnerable or disabled members of the group in need of medical attention and any children.
54. We are also always concerned as to the medical condition of those on the site, both physical and mental health. If anyone is pregnant or there is a new born baby, this will also be recorded and taken into account in determining what action to take. The information gathered is always forwarded to the appropriate Council Department dealing with housing, public health and educational matters. Following a referral to the various interested agencies within the Council, I am always aware that if asked for, advice and assistance can be given. As part of the process, anyone who wants to make a housing application is invited to do so. Information and guidance for health and welfare issues is also provided where appropriate. Insofar as the children are concerned, we also give particular attention to their educational needs.

55. I now have produced and shown to me marked exhibit “YF7”, a 21 page Parkguard Incident Report setting out in considerable detail the events surrounding the recent encampments in Ham Common from 26 July 2024 and King George’s Fields from 5 August 2024. As will be appreciated many hours are spent on the sites working with the Travellers assessing their needs and ensuring their well-being. After attendance very thorough notes are taken. Needless to say the note-taking itself is a lengthy process involving many hours of officers time.
56. In accordance with the Borough’s usual procedure we engage with the Travellers to ascertain their intentions and advise of the PSPO and byelaws which are in force across the Council’s open spaces. Welfare checks are then carried out to ascertain if there are any vulnerable persons on site. If there is not, we proceed with process of eviction.
57. The process of eviction, subject to the circumstances of the case and the Travellers, is either by the issue and service of a Removal Direction requiring the Travellers to leave under Section 77 of the 1994 Act, enforced by means of a Removal Order under Section 78 of the 1994 Act, or if necessary, by the commencement of possession proceedings. The process can take a long time as the Travellers frequently try to avoid being removed and there may also be delays securing a hearing date from the courts.
58. Whilst we endeavour to keep the area clean and tidy during an encampment we need to assess risk to our contractors. Generally, we supply waste bags to the group via Parkguard to manage the volume and impact on community. Our Contractors will empty bins around perimeter that are safe to access to prevent widespread littering across the site caused by foxes and birds ripping open bags to scavenge for food. Only once the Travellers have left a site, would I and my team go onto the site to assess a full clean up and what works of restoration are required. It is always hoped that the level of waste will be manageable by Borough staff, because although their time has a value it is cheaper than if outside contractors need to be engaged. Obviously if the waste is significant (industrial scale) I would contact external contractors to remove the building materials as the volume would be far beyond that which we could manage.
59. If a site can be cleared by my team, then the costs are far less than if outside contractors do the clearance. However, the number of hours expended in making good the area again, in order for it to be useable for the community, can be considerable in particular the volume of waste to be disposed of. This is because

in addition to general clear-up, it is almost always the case that the Green Spaces and sport facilities need reinstatement of some sort. This can be a lengthy process as the land can be significantly damaged, particularly in the Autumn and Winter months when the ground conditions are wet.

60. Obviously, even after the Travellers have left a particular green space, we need to be constantly vigilant, as it is possible that a piece of glass or wood or metal or other hazardous waste may not have been spotted during the first clean up.

Seeking an Injunction

61. I am advised that when a Court considers an interlocutory injunction such as the one being sought by the Council it is obliged to have regard to the tests set out in the case of *American Cyanamide v Ethicon* which broadly states that (1) if there is a serious issue identified which cannot be addressed by the recovery of damages; and (2) the balance of convenience is more in favour of the granting of an injunction than against doing so, then an injunction will be ordered. In addition, the Court takes into account the fact that there is no real defendant in opposition as it is not as if there is any claim to an entitlement to occupy on public land or fly-tip.
62. There can be no question that a serious issue is before the Court, namely the potential for trespassing, public nuisance and contraventions of the PSPO or byelaws on Council land. This arises not just by virtue of the trespassing encampments being established, but also by virtue of serious acts of nuisance by the acts of uncontrolled littering and fly-tipping. This is personal, domestic and industrial waste. Even if, which of course is not the case, the trespass could be met by the payment of fees, giving the unknown persons a right to occupy, the adverse effect on the inhabitants of the Borough and lawful visitors using the Green Spaces, where communities encamp on the leisure and recreational areas of the Borough could not possibly be quantified in damages and certainly could not be reimbursed to the residents and others affected by it.

The Draft Order

63. Since there is very clearly a serious issue, where damages cannot act as an adequate remedy and the balance of convenience is firmly in the Council's favour, I do respectfully request the Court grant the injunction sought in the terms of the draft Order presented as part of the application paperwork.

64. The draft Order seeks to prevent vehicles such as caravans and mobile homes, as well as vans and lorries, coming onto the 8 specified sites for the purposes of occupation. In addition, the draft Order seeks to restrict the depositing of waste and fly-tipping. Nothing in the draft Order restricts driving in the Borough or even driving on roadways within the sites sought to be protected where roadways exist, such as roadways within a park. It is simply seeking to prevent specified sites from being occupied as an encampment and / or waste depositing. The draft Order does not have the effect of restricting in any way the lawful activities of anyone outside the terms of the Order.
65. The injunction would attach to the 8 specified sites, but of course there would be nothing to stop an individual applying to the Court to set aside or vary any Order made if they felt the Order was unfair and should be set aside or varied.

The Hoped-for Benefit:

66. It is appreciated that there was a reduction in the number of encampments in 2020 and 2021. However, the recent activities of the Travellers within the Borough has increased and the Council are now very concerned that these regular visits are causing huge problems for the Borough. Attempts by other means to avoid encampments have failed. These attempts rely on the legislation and increased security, but they are of limited assistance. The Travellers know their rights and how to exploit the legal process and frustrate the exercise of Council's legal remedies. They also significantly know how to breach the measures deployed by the Council to secure its sites including physical barriers.
67. The perceived only way to address this problem is to seek the injunction for the limited number of sites sought. The application is intended to prevent there being a problem before it arises, rather than reacting to the problem after the event and after the encampments have been established. This is because they are established in a matter of minutes but take days to remove, often at very significant cost in terms of the removal and restoration.
68. The benefits to the communities within the Borough will be significant (as they were previously when the borough wide injunction was in force). Community relations and contentment will increase. This is an important consideration in a Borough that does have social and economic problems to contend with. It is hoped that the huge amounts of money that have had to be expended containing, controlling and

recovering land unlawfully occupied can be better used to enhance the quality of life of all the residents of the Borough allowing access to enjoy the spaces. There can be no doubt that the amounts previously expended on addressing the problem of unlawful occupation and fly-tipping has been extremely damaging to so many aspects of community funding, from social services to education and transport to safety, especially at times of austerity.

69. An injunction will also assist the local police who do not have the resources to fully police the problem (exemplified by the Kew Green encampment in June 2023, where the Police declined to exercise their powers under Section 61 of the 1994 Act, even after a serious assault on a member of the public by 4 youths from the encampment), but who are constantly being contacted with reports of criminal activity and ASB. The Police also declined to use the powers in July/August 2024 during Ham Common and King George's Field encampments (see paragraph 44 above) as they believed the threshold for ASB had not been met, despite our reports of criminal damage to council land and property.
70. I am quietly confident, particularly based on past experience, that the order being sought as part of this application will reduce the visits by persons wanting to occupy and / or fly-tip on the 8 specified green spaces, so as to enhance the quality of life of all the residents and visitors to the Borough and allowing unimpeded access to the spaces and its facilities. It is recognised that the other Green Spaces in the Borough remain vulnerable, but that is the balance that this application seeks to achieve; namely protecting the particularly vulnerable and important sites for the benefit of residents and the wider community who visit them but recognising a need for the Travelling Community to remain when they visit the Borough.

Conclusion:

71. The Council is seeking a preventative injunction for 8 specified sites. This is because it is seen as necessary to try and prevent the occupation of these sites in the first place and adjust the balance which is so prejudicial to the Borough and its residents and the wider community who visit them, when an encampment is established and when serious fly-tipping occurs on those sites that are important to the well-being of the Community.
72. A Court order that expressly restricts all persons from occupying, setting up encampments and depositing waste on the specified sites that are to be protected by this injunction application, will ensure that the intended purposes for the Green

Spaces can continue safely and for the good of the Community. It is neither fair nor lawful for these areas to be used for the establishment of encampments and fly-tipping. It is firmly believed, that based on our past experience an injunction will have a significant beneficial effect in protecting the specified sites from unlawful occupation and waste depositing.

- 73. It is for this reason that this application is made, which I respectfully request the Court to order, as it is hoped that by having an injunction preventing encampments being established or waste being deposited, the attraction of the Borough to the Traveller community will slowly cease.

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 17th day of September 2024

IN THE HIGH COURT OF JUSTICE

Claim No. KB-2024-

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-

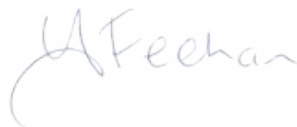
**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT AND /
OCCUPYING FOR RESIDENTIAL PURPOSES (including temporary
accommodation) WITH OR WITHOUT VEHICLES AT ANY OF THE 6 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON
THE SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 6 SITES WITHIN
THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON THE
SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

Defendants

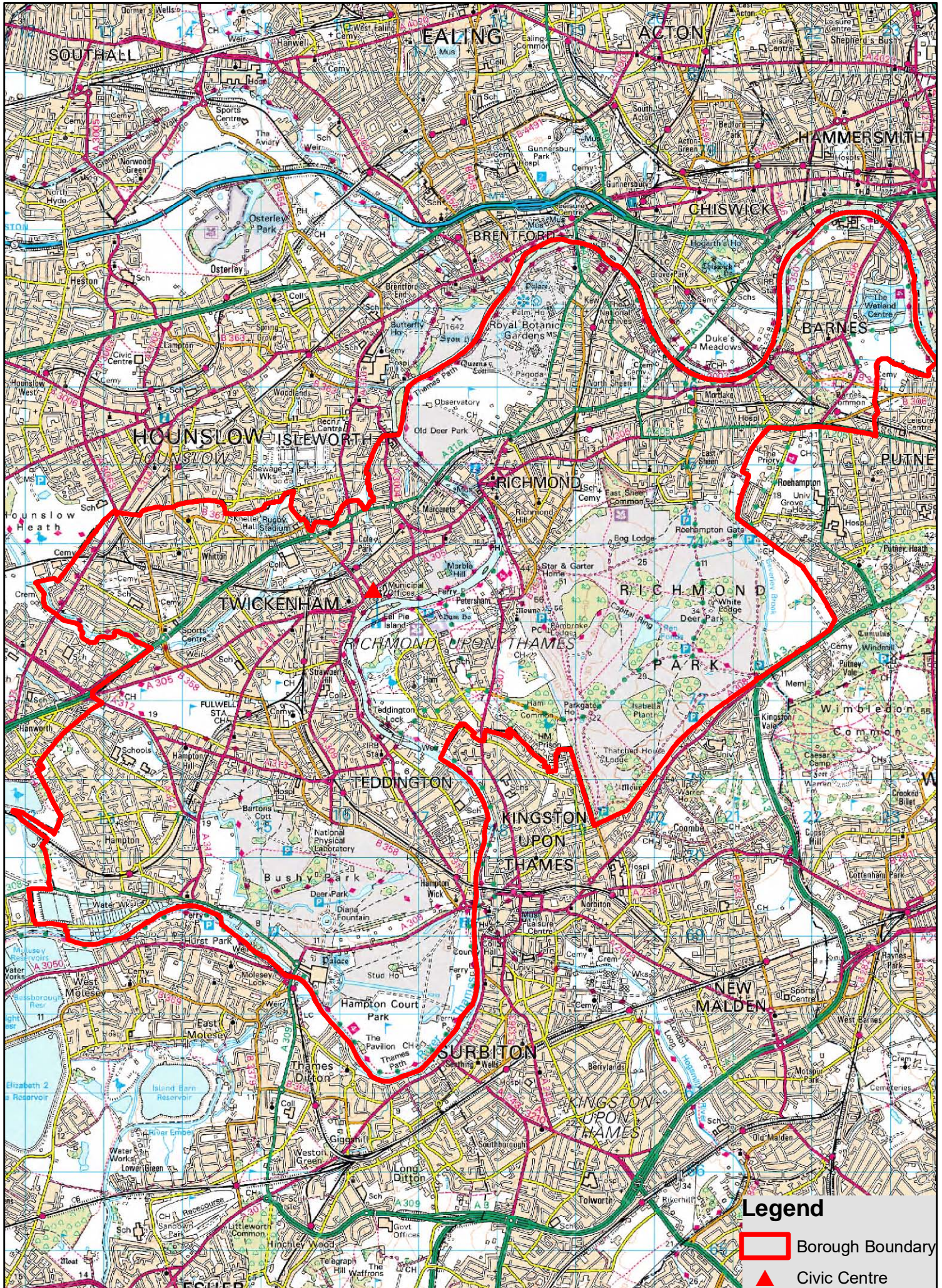
EXHIBIT "YF1"

This is Exhibit Sheet "YF1" referred to in the Witness Statement of YVONNE FEEHAN dated 17 September 2024.



.....
YVONNE FEEHAN

London Borough Of Richmond Upon Thames Boundary



IN THE HIGH COURT OF JUSTICE

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**IN THE MATTER OF SECTION 222 OF THE LOCAL GOVERNMENT ACT 1972
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Defendants

EXHIBIT "YF2"

This is Exhibit Sheet "YF2" referred to in the Witness Statement of YVONNE FEEHAN dated 17 September 2024.



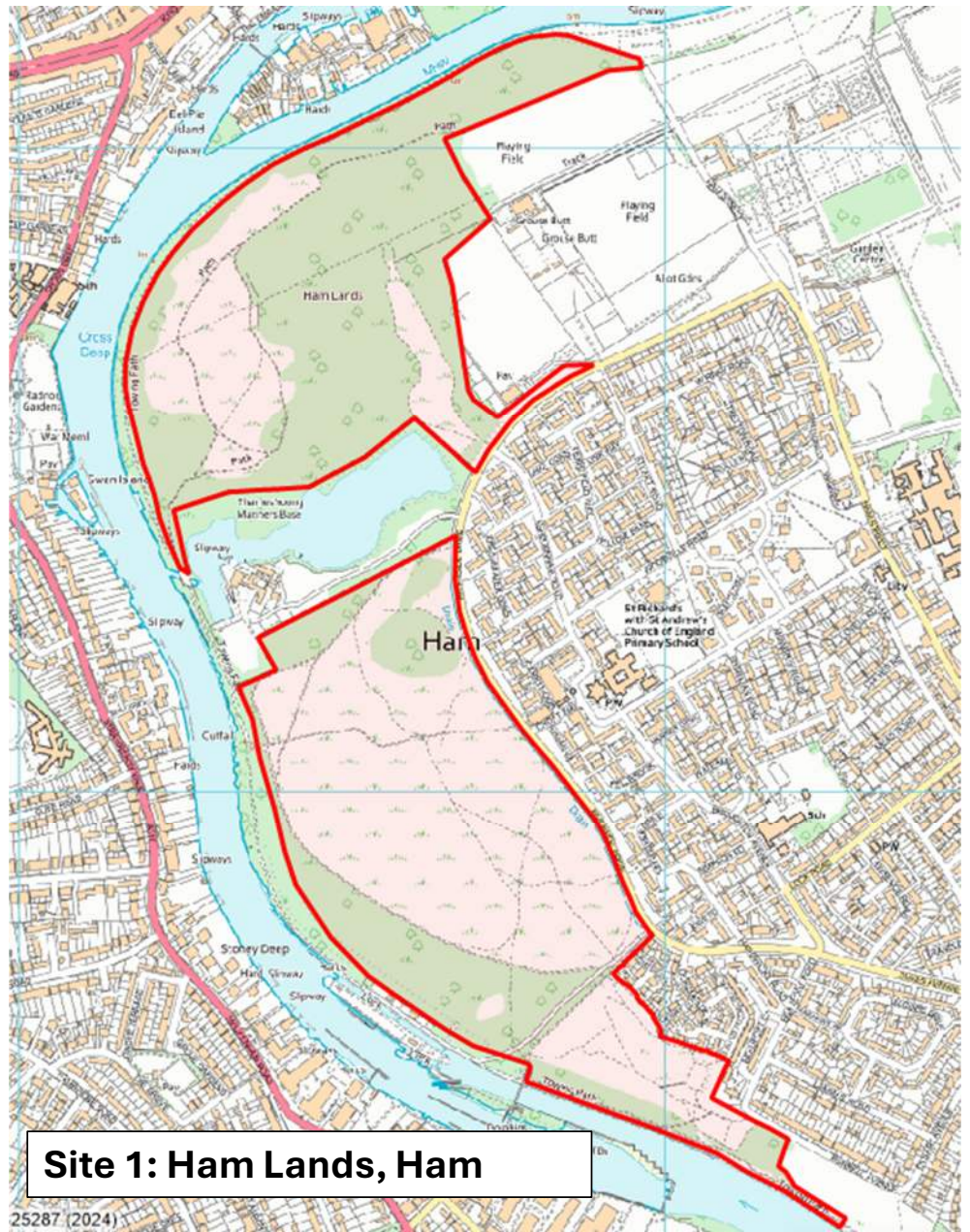
.....
YVONNE FEEHAN

Parks and Open Spaces

No.	Site Name	Address
1	Alpha Road Gardens	Alpha Road, Teddington, TW11 0QG
2	Arundel Close Wildlife Site	Arundel Close, Hampton, TW12 1SW
3	Barn Elms Playing Field	Queen Elizabeth Walk, London, SW13 9SA
4	Barn Elms Southside	Rocks Lane, London, SW13 9SA
5	Barnes Common	Vine Road, London, SW13 0NE
6	Barnes Green	Church Road, London, SW13 9HE
7	Beaufort Court	Fisherman Close, Richmond, TW10 7YP
8	Bell Hill Recreation Ground	Thames Street, Hampton, TW12 2EA
9	Benn's Alley	Thames Street, Hampton, TW12 2EW
10	Beveree Wildlife Site	Beaver Close, Hampton, TW12 2BZ
11	Bridge House Gardens	Bridge Street, Richmond, TW9 1TQ
12	Broom Road Recreation Ground	Trowlock Way, Teddington, TW11 9QY
13	Buccleuch Gardens	Petersham Road, Richmond, TW10 6UY
14	Bucklands Open Space	Sycamore Way, Teddington, TW11 9QQ
15	Burnell Avenue Open Space	Burnell Avenue, Richmond, TW10 7YE
16	Cambourne Path	Northumberland Place, Richmond, TW10 6TS
17	Cambridge Gardens	Clevedon Road, Twickenham, TW1 2TA
18	Carlisle Park	Wensleydale Road, Hampton, TW12 2UL
19	Castelnau Recreation Ground	Barnes Avenue, London, SW13 9AA
20	Champions Wharf Play Beach	Champions Wharf, Twickenham, TW1 3DT
21	Chase Green	Redway Drive, Twickenham, TW2 7NN
22	Cholmondey Walk	Friars Lane, Richmond, TW9 1NP
23	Church Road Play Area	Church Road, Teddington, TW11 8PY
24	Compass Hill	Hill Rise, Richmond, TW10 6UB
25	Court Close	Court Close, Twickenham, TW2 5JH
26	Crane Park	Crane Park Road, Twickenham, TW2 6DF
27	Craneford Way	Craneford Way, Twickenham, TW2 7SQ
28	Cypress Avenue Play Area	Cypress Avenue, Whitton, TW2 7JU
29	Duke of Northumberland River	Whitton Dene, TW7 7LA
30	Dean Road Open Space	Dean Road, Hampton, TW12 3JL
31	Diamond Jubilee Gardens	The Embankment, Twickenham, TW1 3DU
32	Elmfield Gardens	High Street, Teddington, TW11 8EE
33	Garfield Road	Garfield Road, Twickenham, TW1 3JS
34	Garricks Lawn	Hampton Court Road, Hampton, TW12 2EN
35	Gothic Gardens	Petersham Road, Richmond, TW10 6UT
36	Grimwood Road Recreation Ground	Grimwood Road, Twickenham, TW1 1BY
37	Grove Gardens	The Grove, Teddington, TW11 8AS
38	Grove Road Gardens	Grove Road, Richmond, TW10 6SW
39	Ham Avenues	Sandy Lane, Ham, TW10 7EJ
40	Ham Common	Upper Ham Road, Richmond, TW10 5LA
41	Ham Common Woods	Ham Gate Avenue, Richmond, TW10 5HD
42	Ham Lands	Kingfisher Drive, Richmond, TW10 7UE
43	Ham Riverside Meadow	Ham Street, Richmond, TW10 7RS
44	Ham Riverside Pitches	Ham Street, Richmond, TW10 7RS
45	Ham Village Green	Ham Street, Richmond, TW10 7HW
46	Ham Street Car Park	Ham Street, Richmond, TW10 7RS
47	Hampton Common	Buckingham Road, Hampton, TW12 3JA
48	Hampton Village Green	Ham Street, Richmond, TW10 7HW
49	Hatherop Park	Hatherop Road, Hampton, TW12 2RQ

50	Heathfield Recreation Ground	Powder Mill Lane, Twickenham, TW2 6EG
51	Holly Road Garden Of Rest	Queens Road, Twickenham, TW1 4EU
52	Holly Road Recreation Ground	School Road Avenue, Hampton, TW12 1QJ
53	Hounslow Heath	Hanworth Road, Hounslow, TW4 5LJ
54	Isleworth Promenade	Isleworth, Twickenham TW7 7BY
55	Jubilee Gardens, Teddington	Station Road, Teddington, TW11 8EW
56	Jubilee Gardens, Mortlake	Mortlake High Street, London, SW14 8HQ
57	Jubilee Meadow	Powder Mill Lane, Twickenham, TW2 6EG
58	Kew Green	Kew Green, Richmond, TW9 3BH
59	Kilmorey Mausoleum	St Margarets Drive, Twickenham, TW1 1QN
60	King Georges Field	Ham Street, Richmond, TW10 7RS
61	Kings Field	Hampton Court Road, Kingston upon Thames, KT1 4AE
62	Kneller Gardens	Meadway, Twickenham, TW2 6PH
63	Langdon Park	Broom Road, Teddington, TW11 9PQ
64	Leg O Mutton	Lonsdale Road, London, SW13 9QN
65	Linear Walk	Hawley Close, Hampton, TW12 3XX
66	Manor Gardens	Manor Road, Hampton, TW12 2TX
67	Manor Road Recreation Ground	Manor Road, Teddington, TW11 8BF
68	Maple Close Open Space	Maple Close, Hampton, TW12 3QL
69	Mears Walk	Northumberland Place, Richmond, TW10 6TS
70	Mereway Nature Park	Rowntree Road, Twickenham, TW2 6RP
71	Midhurst Site	Petersham Road, Richmond, TW10 6UT
72	Mill Road Open Space	Mill Road, Twickenham, TW2 5HA
73	Moormead and Bandy Recreation Ground	Moor Mead Road, Twickenham, TW1 1JS
74	Mortlake Green	Sheen Lane, London, SW14 8HY
75	Mullins Path Open Space	Mullins Path, London, SW14 8EZ
76	Murray Park	Kneller Road, Whitton, TW2 7DY
77	North Sheen Recreation Ground	Dancer Road, Richmond, TW9 4LB
78	Nursery Green	The Avenue, Hampton, TW12 3RG
79	Oak Avenue Local Nature Reserve	Oak Avenue, Hampton, TW12 3QD
80	Old Deer Park	Old Palace Lane, Richmond, TW9 1PQ
81	Orleans Gardens	Orleans Road, Twickenham, TW1 3BJ
82	Orleans House Gardens	Orleans Road, Twickenham, TW1 3BJ
83	Pages Green	Abbott Close, Hampton, TW12 3XR
84	Palewell Common and Fields	Enmore Gardens, London, SW14 8RF
85	Palewell Common Woods	Enmore Gardens, London, SW14 8RF
86	Pantile Bridge	Uxbridge Road, Hampton
87	Partridge Green	Hawley Close, Hampton, TW12 3XX
88	Pesthouse Common	Queens Road, Richmond, TW10 6HF
89	Petersham Common Woods	Petersham Road, Richmond, TW10 6UY
90	Petersham Lodge Woods	River Lane, Richmond, TW10 7AG
91	Queen Elizabeth Walk	Rocks Lane, London, SW13 0DG
92	Radnor Gardens	Cross Deep, Twickenham, TW1 4RB
93	Raleigh Road Recreation Ground	Raleigh Road, Richmond, TW9 2DU
94	Richmond Green	The Green, Richmond, TW9 1LX
95	Richmond Little Green	The Green, Richmond, TW9 1LX
96	Richmond Riverside	Heron Square, Richmond, TW9 1EP
97	Riverdale Gardens	Northumberland Place, Richmond, TW10 6TS
98	Riverside Drive (Ham)	Riverside Drive, Richmond, TW10 7QA
99	Riverside Ham Street	Ham Street, Richmond, TW10 7RS
100	Rocks Lane Recreation Ground	Ranelagh Avenue, London, SW13 0BY

101	Rotary Gardens	Northumberland Place, Richmond, TW10 6TS
102	Sandy Lane Recreation Ground	Sandy Lane, Richmond, TW10 7EJ
103	School House Lane Orchard	School House Lane, Teddington, TW11 9DP
104	Sheen Common	Fife Road, London, SW14 7EL
105	Small Profits Dock	Lonsdale Road, London, SW13 9QL
106	St Albans Riverside	Hampton Court Road, Hampton, TW12 2EN
107	St Luke's Open Space	Victoria Cottages, Richmond, TW9 3NW
108	Strawberry Woods	Stanley Road, Twickenham, TW2 5NR
109	Suffolk Road Recreation Ground	Suffolk Road, London, SW13 9NR
110	Sunshine Terrace	Water Lane, Twickenham, TW1 3NP
111	The Copse	Meadlands Drive, Richmond, TW10 7EE
112	Tangier Green	Tangier Road, Richmond, TW10 5DP
113	Tapestry Court	Mortlake High Street, London, SW14 8HL
114	Teddington Memorial Gardens	Hampton Rd, Teddington TW11 0JL
115	Terrace Gardens	Richmond Hill, Richmond, TW10 6RH
116	Terrace Walk and Field	Nightingale Lane, Richmond, TW10 6UZ
117	Thames Bank	Thames Bank, London, SW14 7QR
118	Twickenham Embankment	Embankment, Twickenham, TW1 3NP
119	Twickenham Green	First Cross Road, Twickenham, TW2 5AQ
120	Twickenham Rough	London Road, Twickenham, TW1 1AA
121	Udney Hall Gardens	Langham Road, Teddington, TW11 9HQ
122	Vicarage Road	Wades Lane, Teddington, TW11 8HF
123	Vine Road Recreation Ground	Vine Road, Barnes, SW13 0NE
124	Vineyard Passage Cemetery	Grosvenor Road, Richmond, TW10 6PB
125	Warren Gardens	Denton Road, Twickenham, TW1 2HH
126	Water Lane Open Space	Water Lane, Twickenham, TW1 3NP
127	Wellesley Road (Fortescue Play Area)	Wellesley Road, Twickenham, TW2 5RX
128	Wellesley Crescent	Wellesley Crescent, Twickenham, TW2 5RT
129	Westerley Ware Recreation Ground	Kew Green, Richmond, TW9 3AP
130	Worple Way Recreation Ground	Albert Road, Richmond, TW10 6DP
131	York House Gardens	Sion Road, Twickenham, TW1 3DD



Site 1: Ham Lands, Ham

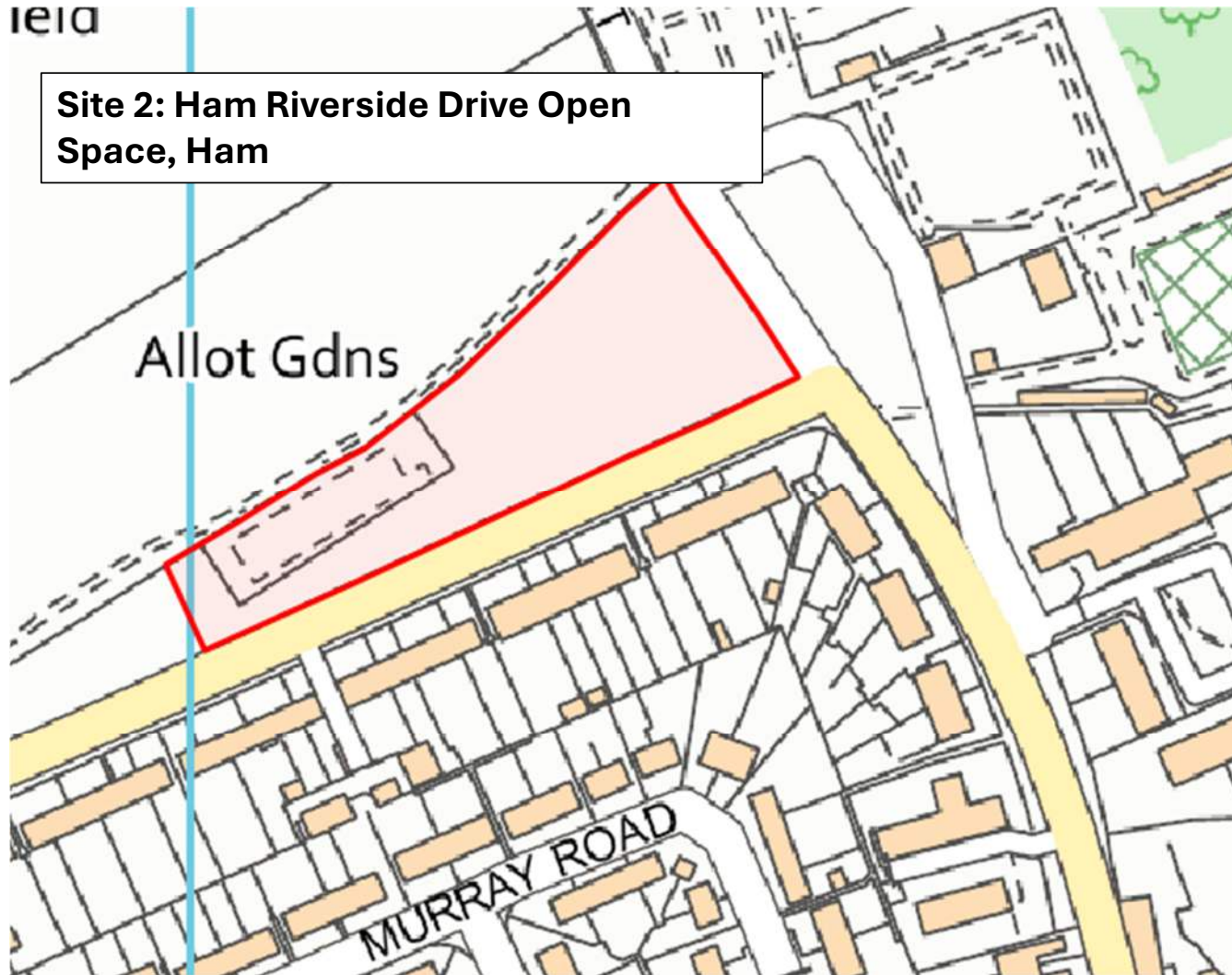
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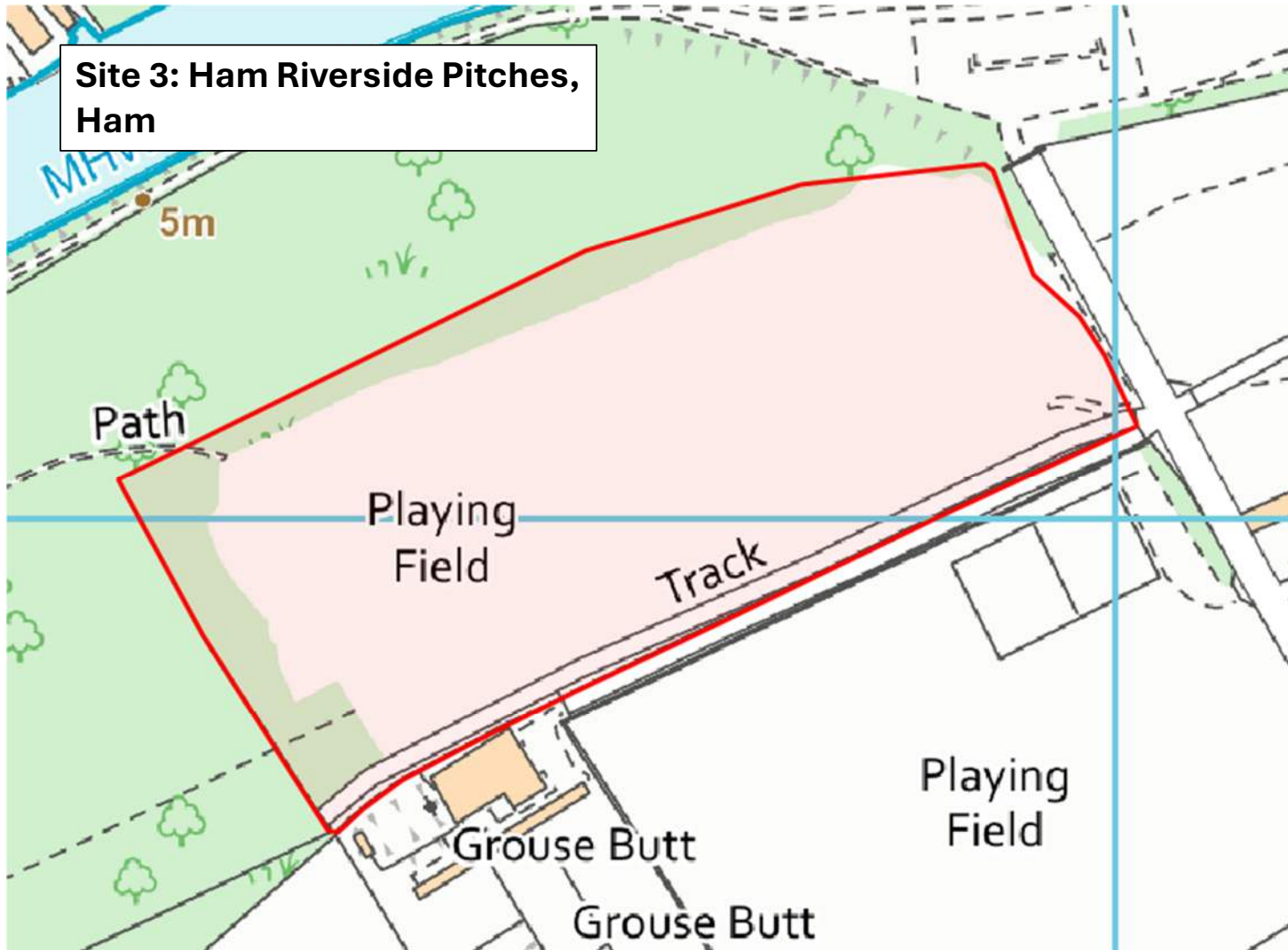
**Site 2: Ham Riverside Drive Open
Space, Ham**

Allot Gdns

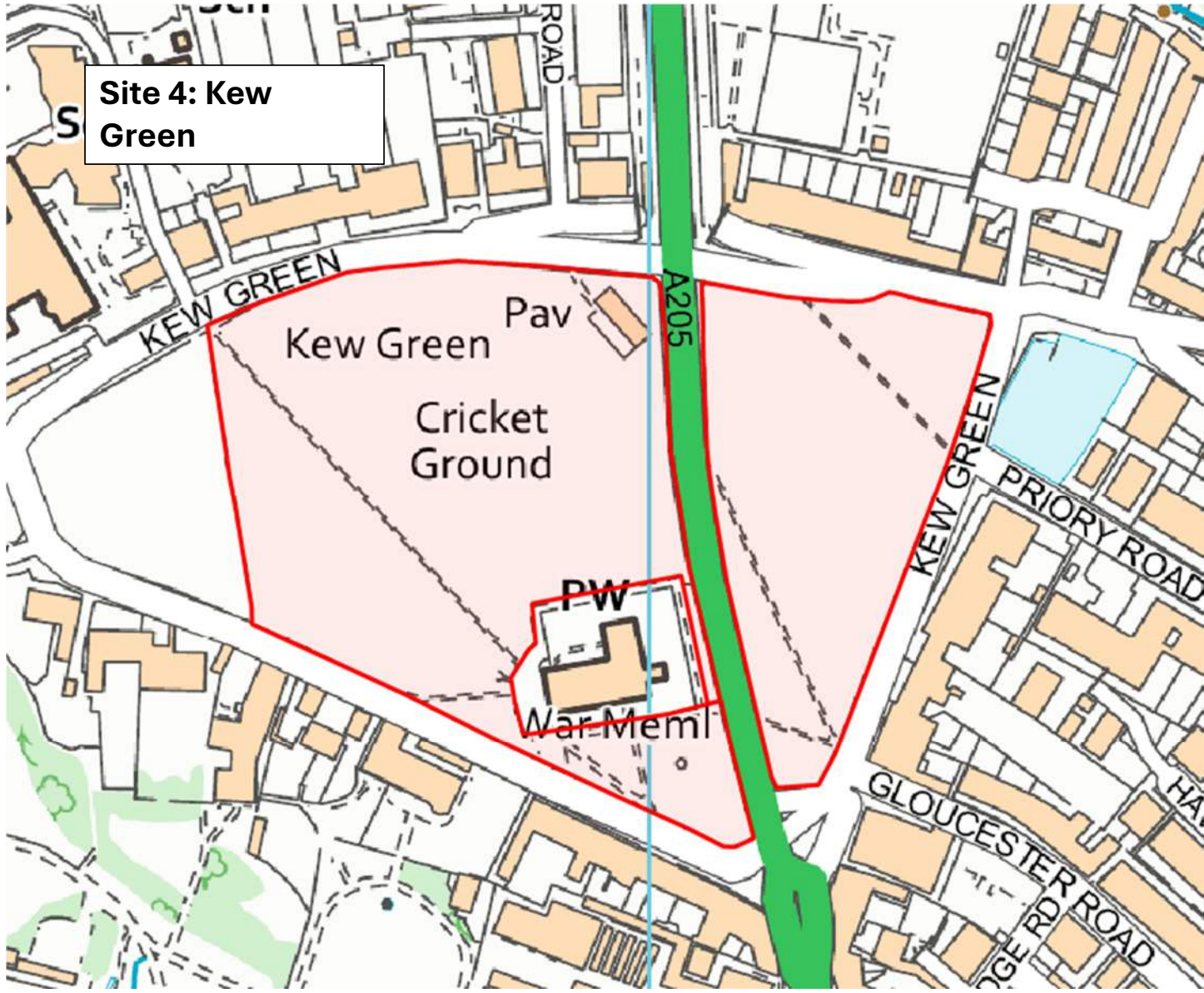
MURRAY ROAD



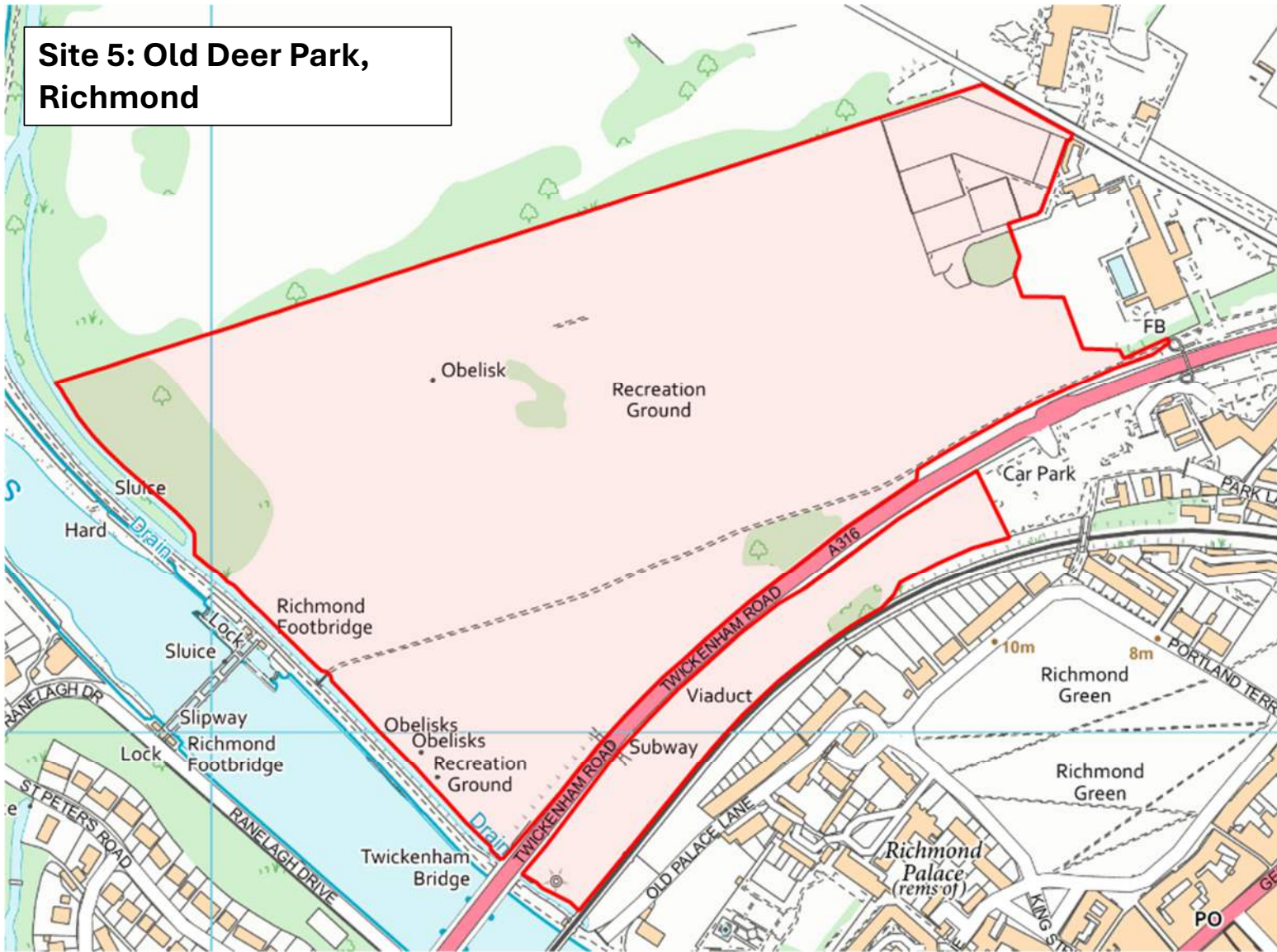
**Site 3: Ham Riverside Pitches,
Ham**



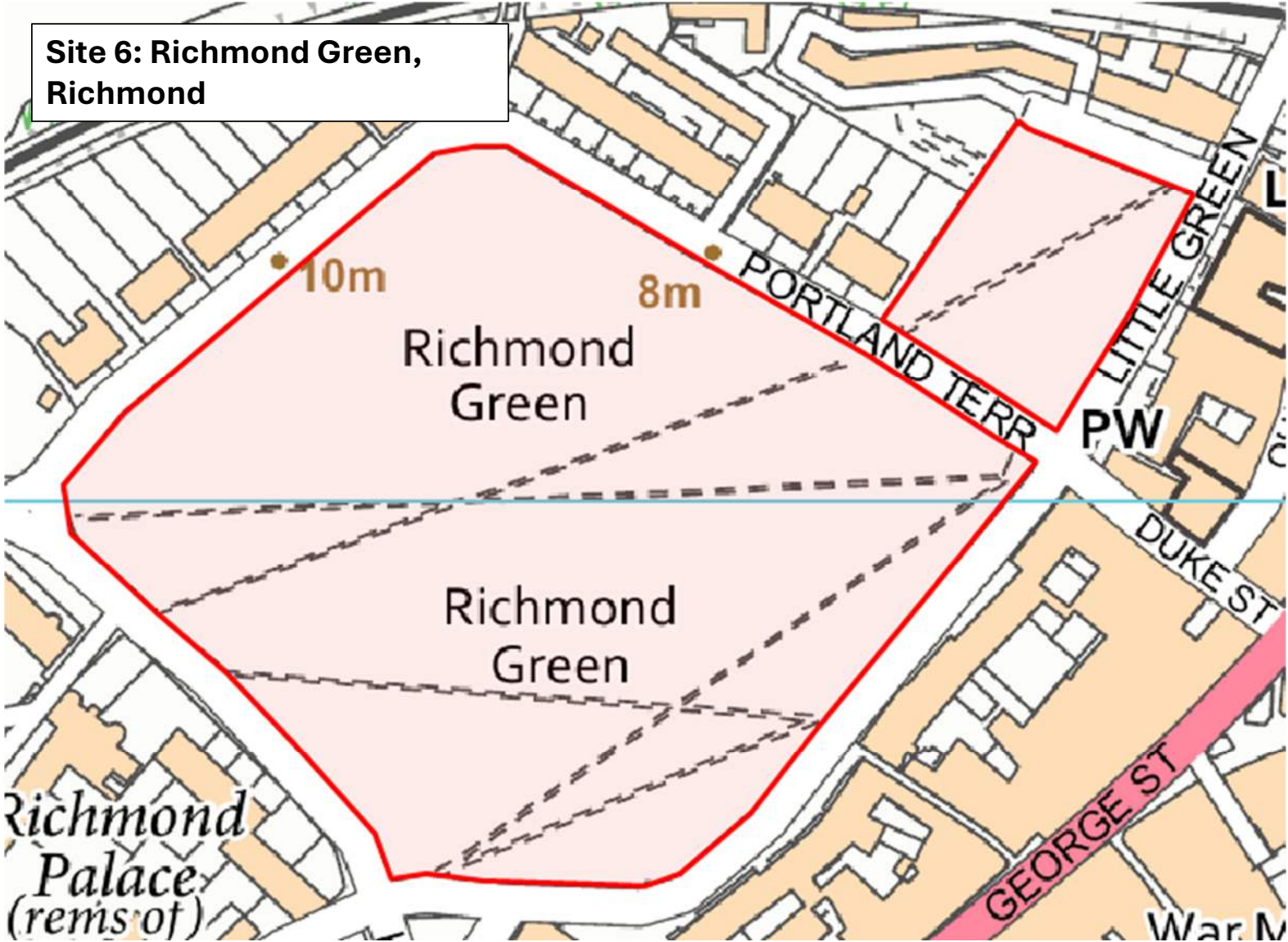
Site 4: Kew Green



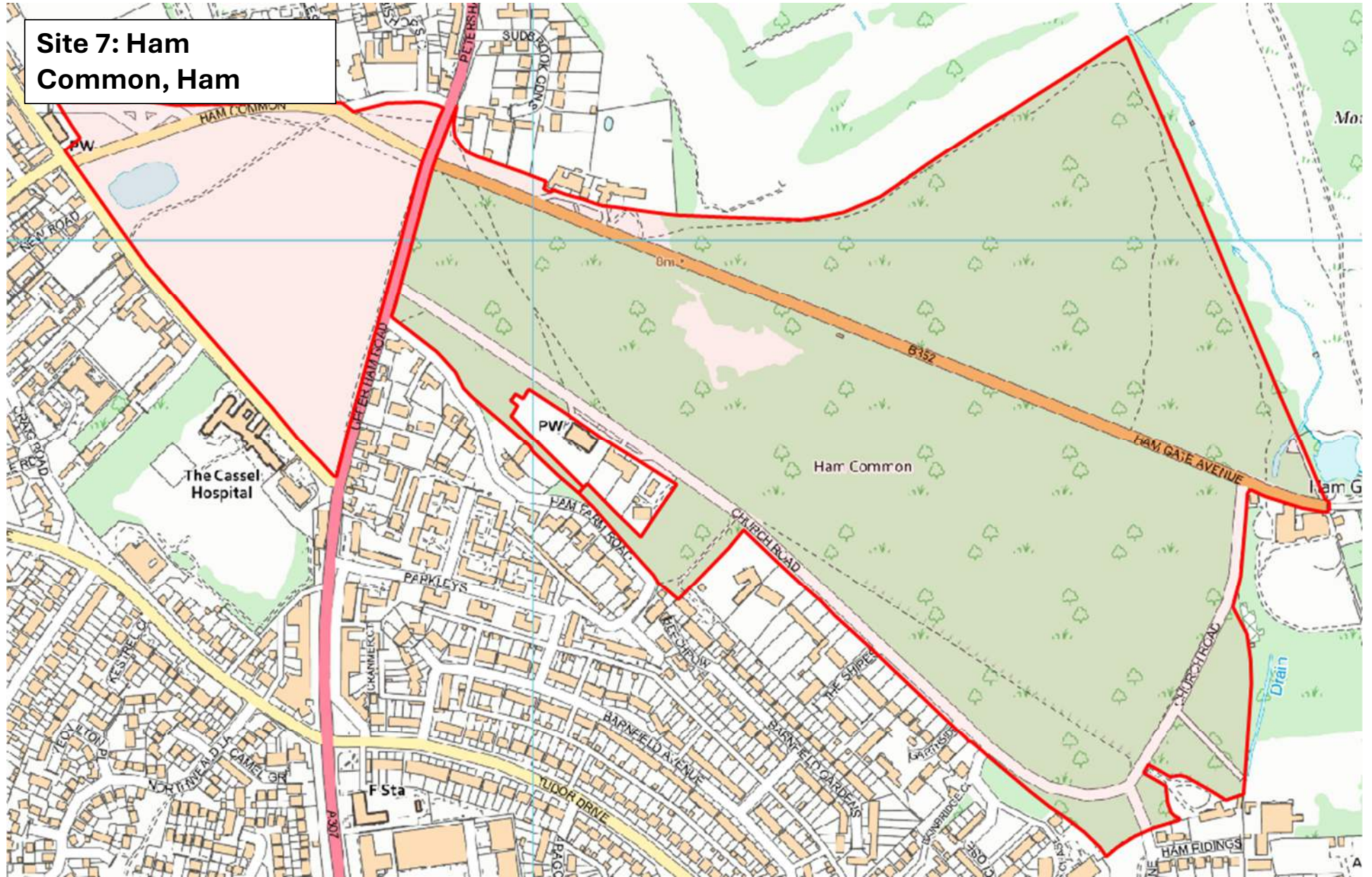
**Site 5: Old Deer Park,
Richmond**

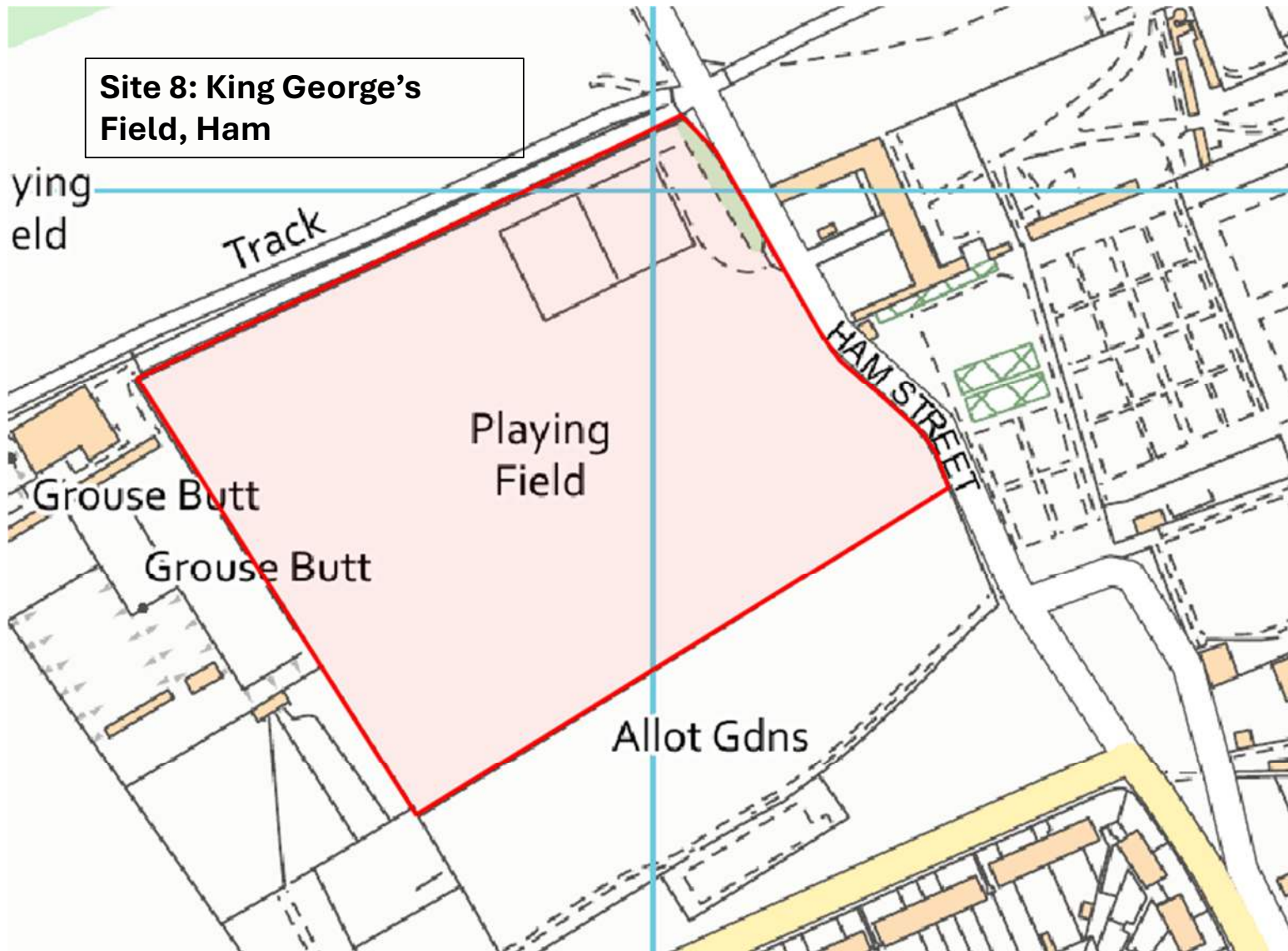


Site 6: Richmond Green,
Richmond



**Site 7: Ham
Common, Ham**





IN THE HIGH COURT OF JUSTICE

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Claimant

-and-

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Defendants

EXHIBIT "YF3"

This is Exhibit Sheet "YF3" referred to in the Witness Statement of YVONNE FEEHAN dated 17 September 2024.



.....
YVONNE FEEHAN

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Environment & Community Services
Service Area	Parks & Highways
Service/policy/function being assessed	High Court Injunction To allow the Council to expedite the removal of unauthorised encampments on Council land
Which borough (s) does the service/policy apply to	Richmond
Staff involved in developing this EINA	Henry Cheung, Roland Copley, David Allister, Yvonne Feehan
Date approved by Directorate Equality Group (if applicable)	
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	
Date submitted to Directors' Board	

1. Summary

Please summarise the key findings of the EINA.

- Richmond Council would like to seek a preventative injunction from the High Court to protect several of the Council's Parks and Open spaces, Council managed carparks and highway verges that could be targeted from unauthorised encampment. Please see the list of sites which are deemed to be necessary and proportionate based on previous incidents in Appendix 1
- The current legislation [Criminal Justice and Public Order Act 1994](#) enable us to address unauthorised encampments, but the process is time consuming and it doesn't prevent encampments moving into the immediate field or park next to the one they have just been evicted from following a Court Order granted by a Magistrates Court.
- The Council's Parks and Open spaces and any Council owned land and highways could therefore be occupied for several weeks at a time following each new encampment, thus disrupting local community events, causing fear, anxiety and concern for immediate residents and those who wish to visit.
- The Council also spend a significant amount of time and cost to clear any waste or fly-tipping that may have been left behind.
- A successful preventative injunction will allow the Council to expedite the removal of unauthorised encampments on the Council's parks and open spaces, managed Carparks and highways that could be targeted from unauthorised encampment. Welfare checks will no longer be required, and they will be unable to relocate to any other area covered by the preventative injunction (see appendix).
- The benefit of the proposal will allow a more proactive and effective enforcement against unauthorised encampments and any anti-social behaviour associated with encampments.
- The outcome sought is that the residents and visitors of the borough will be able to enjoy our parks and open spaces and any other Council owned land listed in the appendix without disruption or fear of anti-social behaviour through an expedient eviction process. Disruption to local businesses will also be reduced as a result.
- The Gypsy and Traveller Community are most likely to be impacted by this proposal. Gypsies and Travellers are protected from discrimination by the Race Relations Act 1976 (amended 2000), the

Human Rights Act 1998 and the Equalities Act 2010, together with other ethnic groups who are recognised in law as having a cohesive culture, language or set of values. There will be a negative impact on Gypsies and Travellers as they will be unable to set up unauthorised encampments on borough parks and open spaces and any Council owned land listed in the injunction.

- To mitigate the impact there will be clear communications regarding the new approach so that Gypsy and Traveller communities are aware. The new approach will allow Gypsies and Travellers to continue to travel through the borough. The proposal is for an injunction on similar terms to the previous interim borough wide injunction, however the sites that the injunction would apply to have been revised and are detailed in the below appendix.
- The Council is seeking to balance the needs of Gypsies and Travellers with those of the wider community, considering the adverse effect that unauthorised encampments and fly tipping has on the borough, its residents, businesses and visitors in both financial and non-financial terms.
- The process of seeking an injunction through the courts allows for debate and for an independent view to be taken by the court.
- To mitigate the impact, there will be clear communications regarding the Council’s enforcement approach so that travellers are aware. Whilst welfare checks will no longer be necessary, if requested, we will continue to direct any Travellers’ welfare issues to the relevant agency or department including medical treatment, surgeries and GPs. Referrals to such entities as housing, through Richmond Housing Partnership, or public health and education through Achieving for Children would be undertaken as appropriate

2. Evidence gathering and engagement

a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
Local data	DataRich
National Data	ONS
National Data	UK Parliament

b. Who have you engaged and consulted with as part of your assessment?

Individuals/Groups	Consultation/Engagement results	Date	What changed as a result of the consultation
N/A			

3. Analysis of need

Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion

Protected group	Findings
-----------------	----------

Age

Data:

Nationally the Gypsy and Irish Traveller population has a young age profile; in the 2021 Census 45.7% were aged 25 or under compared to 30.4% of the England and Wales population ([Census, 2021](#))

Percentage of Gypsy or Irish Traveller ethnic groups and England and Wales population at each year of age, split by sex. England and Wales, Census 2021

The figure is a population pyramid with 'Age' on the vertical axis (0 to 100+) and percentage on the horizontal axis. The left side represents Females and the right side represents Males. Two data series are shown: Gypsy or Irish Traveller (colored purple for females and teal for males) and England and Wales (black outlines). The Gypsy and Irish Traveller population shows a much higher concentration in the 0-25 age range compared to the general England and Wales population, which has a more traditional pyramid shape tapering off with age.

In Richmond under 25's account for 28.43% (55,521) (DataRich 2024, based on 2021 Census)

The age of Travellers at unauthorised encampments in the borough was not collected.

The injunction would not disproportionately affect any age group.

Disability

Data:

The details of individuals with disabilities at unauthorised encampments in the borough were not recorded.

In Richmond 12% of the population are recorded to have a disability which limits their day-to-day activities. (DataRich 2024, based on 2021 Census)

A parliamentary report, estimates that 26% of Gypsy and Traveller communities are recorded as disabled ([UK Parliament, 2019](#))

	The injunction would not disproportionately affect those with disabilities.
Sex	<p>Data: Nationally equal numbers of men and women identified as Gypsy or Irish Traveller in the 2021 Census. In Richmond, 55% of Gypsies and travellers are female (Data Rich, 2024).</p> <p>In the London Borough of Richmond upon Thames, 48% (93,962) of the population are male and 52% (101,316) are female (Data Rich, 2024).</p> <p>For the unauthorised encampments the gender of Travellers was not collected.</p> <p>The injunction would not disproportionately affect either sex.</p>
Gender Identity	<p>Data: In the 2021 Census in Richmond, 0.1% of the borough population (226 people) stated their gender was different from their sex assigned at birth but did not specify what their gender identity was, 0.1% (137 people) were trans women, 0.1% (113 people) were trans men and 0.1% (134 people) identified as one of ‘all other gender identities’. Compared to national population, 0.24% (118,000 people) stated their gender was different from their sex assigned at birth but did not specify, 0.1% (48,000 people) identified as trans women, 0.1% (48,000 people) identified as trans men, 0.06% (30,000 people) identified as non-binary and 0.04% (18,000 people) were from another ‘all other gender identities’.</p> <p>The injunction would not disproportionately affect any gender identity.</p>
Marriage and civil partnership	<p>Data: There were 69,175 households in England and Wales with a household reference person who identified as a Gypsy or Irish Traveller in the 2021 Census. (ONS, 2023)</p> <p>The most common family household type among these households was ‘lone parent’ at 24.6% (ONS, 2023), compared with 16% of the general national population in England and Wales (ONS, 2023)</p> <p>The second most common household type among households with someone who identified as Gypsy or Irish Traveller was ‘married or same-sex civil partnership couple’ at 23%. This is compared to 33% of the general national population in England and Wales (ONS, 2014). Data not available from 2021 Census.</p> <p>Data on marital & civil partnership status was not collected for the unauthorised encampments</p>
Pregnancy and maternity	Data:

	<p>In 2021 there were 2,422 conceptions in Richmond borough – an annual conception rate of 65 per 1000 women. This is lower than the conception rate for London (70.8 per 1000) and the rate for England (71.5 per 1000) (Census, 2021).</p> <p>Data on pregnancy and maternity was not collected for the unauthorised encampments</p>																		
<p>Race/ethnicity</p>	<p>Data:</p> <p>Gypsies and Irish Travellers are protected from discrimination by the Race Relations Act 1976 (amended 2000), the Human Rights Act 1998 and the Equalities Act 2010, together with other ethnic groups who are recognised in law as having a cohesive culture, language or set of values.</p> <p>In the 2021 Census, there were 85 people of Gypsy or Irish Traveller ethnicity in Richmond. This translates to less than 0.1% of the overall borough population.</p> <table border="1" data-bbox="459 779 1528 1182"> <thead> <tr> <th>Ethnicity</th> <th>Total</th> <th>% of total population</th> </tr> </thead> <tbody> <tr> <td>Asian/Asian British / Asian Welsh</td> <td>17,467</td> <td>8.9</td> </tr> <tr> <td>Black/ Black British / Black Welsh / Caribbean or African</td> <td>3,687</td> <td>1.9</td> </tr> <tr> <td>Mixed /multiple ethnic group</td> <td>10,662</td> <td>5.5</td> </tr> <tr> <td>White</td> <td>157,111</td> <td>80.5</td> </tr> <tr> <td>Other ethnic group</td> <td>6,350</td> <td>3.3</td> </tr> </tbody> </table> <p>80.5% of the borough population is recorded as White (Census, 2021). This is significantly higher than the London average.</p> <p>In the past 24 months there have been 6 unauthorised encampments in the Borough involving Travelers. On each occasion a welfare check is offered but this is often rejected so we are unable to provide detailed local population data.</p>	Ethnicity	Total	% of total population	Asian/Asian British / Asian Welsh	17,467	8.9	Black/ Black British / Black Welsh / Caribbean or African	3,687	1.9	Mixed /multiple ethnic group	10,662	5.5	White	157,111	80.5	Other ethnic group	6,350	3.3
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Mixed /multiple ethnic group	10,662	5.5																	
White	157,111	80.5																	
Other ethnic group	6,350	3.3																	
<p>Religion and belief, including non belief</p>	<p>Data on religion and beliefs, including non-belief was not collected for the unauthorised encampments.</p> <p>In the Richmond Borough (Census, 2021):</p> <ul style="list-style-type: none"> • 45.4% are Christian • 37.9% No Religion • 4.4% Muslim • 2.1% Hindu • 1.0% Sikh • 0.8% Buddhist • 0.7% Other religion • 0.6% Jewish 																		

Sexual orientation	<p>In Richmond, 3.4% of the population identify as Lesbian, Gay Bisexual or ‘Other’, compared to 3.16% of the population in England and Wales (Census, 2021)</p> <p>Data on sexual orientation was not recorded for the unauthorised encampments.</p>		
Across groups i.e. older LGBT service users or Black, Asian & Minority Ethnic young men.	<p>No specific issues raised</p>		
<p>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups:</p> <ul style="list-style-type: none"> • Deprivation (measured by the 2019 English Indices of Deprivation) • Low-income groups & employment • Carers • Care experienced people • Single parents • Health inequalities • Refugee status 	<p>Deprivation – 11.7% of Gypsy and Irish Travellers live in the most deprived 10% of neighbourhoods, higher than the average 9.9% (GOV, 2022). There is one traveller site in the borough in Hampton. The location of this site is in one of the LSOA’s with a higher Index of Multiple Deprivation (26.698) in the borough (DataRich, 2024).</p> <p>Low income groups & employment – Gypsy and Irish Traveller ethnic group had the lowest proportion of respondents who were economically active at 47%, in England and Wales this was 63% (GOV, 2022). No local data available.</p> <p>Carers – Gypsy or Irish Traveller ethnic group was among the highest providers of unpaid carer in England and Wales at 11 per cent (10 per cent for England and Wales as a whole) and provided the highest proportion of people providing 50 hours or more of unpaid care at 4 per cent (compared to 2 per cent for England and Wales as a whole) (ONS, 2014). In Richmond, 20% of Gypsy or Irish Travellers were noted to be providing care (DataRich, 2019)</p> <p>Single Parents – The most common family household type in Gypsy and Traveller communities was ‘lone parent’ at 24.6% (ONS, 2023), compared with 16% in England and Wales (ONS, 2023). No local data available.</p> <p>Health Inequalities – In the 2021 Census Those who identified as Gypsy or Irish Travellers were more than twice as likely to report bad or very bad health (12.5%) compared with the England and Wales population (5.2%). In Richmond, from the 2011 Census, 37% of Gypsies and Irish Travellers reported their health as ‘not good’, compared to 30% of Gypsy and Irish Travellers reporting this way in London (DataRich 2024)</p> <p>Refugee status – There are an estimated total of 1827 persons with refugee status in Richmond</p> <table border="1" data-bbox="451 1966 1543 1995"> <tr> <td data-bbox="451 1966 994 1995">Scheme</td> <td data-bbox="994 1966 1543 1995">Richmond</td> </tr> </table>	Scheme	Richmond
Scheme	Richmond		

	Syrian Resettlement scheme (2015-date)	Six families (32 people)
	Afghan Resettlement scheme (2021 – date)	35
	Homes for Ukraine scheme (2022 – Date)	1,052
	Unaccompanied Asylum Seeking Children	26
	Hong Kong BNO scheme	No exact data available, but proxy data shows 497 School Applications from Hong Kongers and 985 people indicated they were born in Hong Kong in the 2021 Census

Data gaps

Data gap(s)	How will this be addressed?
Data on local Gypsy & Traveller population by protected characteristic	Data will be collected if possible during welfare checks, where these are accepted.

4. Impact

Protected group	Positive	Negative
Age	<p>Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage children, young people and older people to make greater use of parks and public places and Council owned facilities.</p> <p>The injunction would allow for the Gypsy and Traveller communities to travel through the borough to alternative destinations.</p>	<p>The injunction would impact the Gypsy and Traveller communities by preventing them from making any unlawful encampment on the sites listed in this document.</p> <p>The injunction would prevent young and old from making unlawful encampments in the borough.</p>
Disability	<p>Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage people with a disability to make greater use of parks and public places and Council owned facilities.</p>	<p>The injunction would impact the Gypsy and Traveller communities by preventing them from making any unlawful encampment on the sites listed in this document.</p> <p>The impact of the proposal is neutral on the subject of disability.</p>

	The injunction would allow for the Gypsy and Traveller communities to travel through the borough to alternative destinations.	
Sex	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage women to make greater use of parks and public places and Council owned facilities	The injunction would impact the Gypsy and Traveller communities by preventing them from making any unlawful encampment on the sites listed in this document. The impact of the proposal is neutral on the subject of sex.
Gender Identity	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage all to make greater use of parks and public places and Council owned facilities.	The injunction would impact the Gypsy and Traveller communities by preventing them from making any unlawful encampment on the sites listed in this document. The impact of the proposal is neutral on the subject of gender identity.
Marriage and civil partnership	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage all to make greater use of parks and public places and Council owned facilities.	The impact of the proposal is neutral on the issue of marriage and civil partnerships.
Pregnancy and maternity	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage all to make greater use of parks and public places and Council owned facilities.	The impact of the proposal is neutral on the issue of pregnancy and maternity
Race/ethnicity	Preventing unauthorised encampments at selected locations will reduce anti-social behaviour and fear for personal safety, encouraging all to make greater use of parks and open spaces and Council owned facilities. The injunction would allow for the Gypsy and Traveller communities to travel through the borough to alternative destinations.	Gypsies and Travellers are protected from discrimination by the Race Relations Act 1976 (amended 2000), the Human Rights Act 1998 and the Equalities Act 2010, together with other ethnic groups who are recognised in law as having a cohesive culture, language or set of values. There will be a negative impact on Travellers as they will be unable to set up unauthorised encampment on any of the parks and open spaces and any

		<p>Council owned land listed in the injunction.</p> <p>To mitigate the impact there will be clear communications from the Council regarding the new approach so that travellers are aware. Subject to budget holder authorisation temporary signs may be installed at each location listed in the appendix. Further communications such as a press release and information on the Council's website will publicise the new restrictions.</p> <p>The new approach will allow Travellers to continue to travel through the boroughs. The proposal is for an injunction on similar terms to the previous interim borough wide injunction. With the injunction cover only the locations listed in the appendix.</p> <p>If requested, we will continue to direct any Travellers' welfare issues to the relevant agency or department including medical treatment, surgeries and GPs.</p>
Religion and belief, including non belief	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage all to make greater use of parks and public places and Council owned facilities.	The impact of the proposal is neutral on the subject of religion and belief or non-belief.
Sexual orientation	There are no specific impacts on sexual orientation from this proposal.	There are no specific impacts on sexual orientation from this proposal.
Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups: <ul style="list-style-type: none"> • Deprivation (measured by the 	The impact of the proposal is neutral on the subject of socio-economic status	Gypsy and Irish Travellers living in deprivation or that have low income may be negatively impacted by the proposal as they will be moved on from the location of the unauthorised encampment. To mitigate against this, we will communicate the changes regarding unauthorised encampments on the Councils webpages.

<p>2019 English Indices of Deprivation)</p> <ul style="list-style-type: none"> • Low-income groups & employment • Carers • Care experienced people • Single parents • Health inequalities • Refugee status 		
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5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Review impact after three months and amend in light of any further negative impacts identified	Henry Cheung / Roland Copley	4 months after a successful application
Speak to other councils who have put this approach in place to identify how they mitigated any negative actions and apply in	Henry Cheung / Roland Copley	4 months after a successful application

6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation

Appendix 1: A List of sites within the London Borough of Richmond upon Thames that the injunction would apply to.

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

Dated

05 September 2024

IN THE HIGH COURT OF JUSTICE

Claim No. KB-2024-

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 6 SITES
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THE SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 6 SITES WITHIN
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SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

Defendants

EXHIBIT "YF4"

This is Exhibit Sheet "YF4" referred to in the Witness Statement of YVONNE FEEHAN dated 17 September 2024.



.....
YVONNE FEEHAN

No:	Date From:	Date to:	Duration of Encampment	Location of Encampment	Legislation Evicted	Total Caravans and Vehicles	Comments	Costs		Total
										£122,793.91
1	05/08/2024	09/08/2024	5 days	King Georges Field (inc Ham Riverside Pitches)	Writ of Possession	40 caravans, 32 vans, 16 cars (+ 2 vehicles and tent at Ham Riverside)		Pakrguard ENF Officer Time	£1,216.43	£40,099.01
								Labour and Disposal of Waste	£5,676.38	
								Repairs/maintenance (estimate)	£3,000.00	
								External Enforcement (Equivo)	£20,534.60	
								Legal	£3,977.60	
Parks Officer Time (2 managers x 43hrs)	£5,694.00									
2	26/07/2024	01/08/2024	7 days	Ham Common	Writ of Possession	43 caravans, 32 vans, 16 cars		Pakrguard ENF Officer Time	£937.00	£41,367.65
								Parkguard Additional Security	£1,320.00	
								External Enforcement (Equivo)	£20,744.00	
								Labour and Disposal of Waste	£8,310.05	
								Legal	£4,362.60	
Parks Officer Time (2 managers x 43hrs)	£5,694.00									
3	13/09/2023	14/09/2023	1 day	Richmond Green	Police moved them on			Parkguard ENF officer time:	£506.70	£2,921.94
								Ground maintenance inspection	£39.44	
								Labour and disposal of Waste:	£1,401.00	
								Parks Officer 10 x £55	£550.00	
								Legal	£424.80	
4	02/06/2023	05/06/2023	4 days	Kew Green	N/A	15 caravans?	left prior to issuing notices	Parkguard ENF officer time:	£990.00	£2,427.38
								Labour and disposal of Waste:	£746.50	
								Ground maintenance inspection:	£78.88	
								Parks Officer		
								Legal (8.5hrs at £612)	£612.00	
5	16/05/2023	17/05/2023	1 days	Kew Green	N/A	9 vehicles & 5 caravans		Parkguard ENF officer time:	£165.00	£1,729.26
								Labour and disposal of Waste:	£945.06	
								Parks Officer		
								Legal (7.1hrs at £511.20 and court fee £108)	£619.20	
6	18/04/2023	21/04/2023	4 days	Kew Green	Possession Order	8 caravans & 6 vehicles		Parkguard ENF officer time: £495	£495.00	£1,657.06
								Labour and disposal of waste: £364 + VAT	£364.00	
								Grounds Maintenance inspection and work	£203.06	
								Park Officer 4 x £55 = £220	£220.00	
								Legal: £375	£375.00	
7	09/08/2022	11/08/2022	2 days	Kew Green	Section 77 (1) of the Criminal Justice and Public Order Act 1994 notice to Leave.	14 vehicles & 9 caravans		Parkguard ENF officer time: £495	£495.00	£1,299.00
								Labour and disposal of waste: £364 + VAT	£364.00	
								Park Officer 8 x £55 = £440	£440.00	
8	01/08/2022	03/08/2022	2 days	Kew Green	Section 77 (1) of the Criminal Justice and Public Order Act 1994 notice to Leave.	11 vehicles & 7 caravans		Parkguard ENF officer time: £495	£495.00	£1,079.00
								Labour and disposal of waste: £364 + VAT	£364.00	
								Park Officer 4 x £55 = £220	£220.00	
9	27/08/2021	31/08/2021	4 days	Ham Riverside	Section 77 (1) of the Criminal Justice and Public Order Act 1994 notice to Leave	3 caravans		ENF Officer Time £453.75 (8.25hr)	£453.75	£701.65
								Legal Cost £247.90	£247.90	
10	04/08/2021	07/08/2021	3 days	Kew Green	High Court Order for Possession	9 caravans, 9 cars and 2 vans		ENF Officer Time £962.50 (2x7.5hr + 1x2.5hr)	£962.50	£9,488.63
								Parks Cleaning Cost TBC		
								Equivo £7050.00	£7,050.00	
								Park Officer Time £550 (£55x10 hrs)	£550.00	
								Cleaning Cost £678.23 + VAT.	£678.23	
11	25/05/2021	01/06/2021	7 days	Kew Green	Possession Order	14 caravans, 12 cars		ENF Officer Time £1303.50 (2x10.6hrs + 1x2.5hr)	£1,303.50	£3,245.83
								Parks Cleaning Cost TBC		
								Park Officer Time £440 (£55x8 hrs)	£440.00	
								Legal Fees £824.10	£824.10	
								Cleaning Cost £678.23 + VAT.	£678.23	

12	21/04/2021	21/04/2021	A few hours	Old Deer Carpark (Pools on Park)	Injunction	1 Caravan	Injunction served	ENF officer time £146 (2x 1.3 hrs)	£146.00	£146.00
13	03/03/2021	04/03/2021	1 day	Riverside Drive, Ham	Injunction	4 caravans and 4 vehicles	Injunction served to leave by 4pm on the 4 th March. Travellers were compliant. No ASB	ENF officer time £275 (2x2.5hrs) Officer Time TBC Parks Cleansing cost TBC	£275.00	£275.00
14	19/06/2020	19/06/2020	1 day	Ham Lands, Ham	Injunction	2 flat bed trucks	Left same day after receiving injunction papers	No costs incurred		£0.00
15	14/05/2020	04/06/2020	21 days	Ham Riverside Pitches, Ham	Due to lockdown there was a delay in issuing injunction as not permitted to move, once ASB escalated on site injunction served.	7 caravans, 10-14 vehicles	Bailiffs asked to attend	ENF officer time: £1980 Disposal of waste: £1456 Park Officer 7 x £55 = £385 Bailiff cost £1980 Legal costs: £666 Reinstatement of bollards cost = £9636	£1,980.00 £1,456.00 £385.00 £1,980.00 £666.00 £9,636.00	£16,103.00
16	28/09/2019	29/09/2019	1 day	Kneller Gardens	Injunction served	13 caravans, 11 vehicles & 4 vans		ENF officer time: £110 Park Officer Time 0.5 = £22.50 Clean up costs = £121	£110.00 £22.50 £121.00	£253.50

IN THE HIGH COURT OF JUSTICE

Claim No. KB-2024-

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
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WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON
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SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

Defendants

EXHIBIT "YF5"

This is Exhibit Sheet "YF5" referred to in the Witness Statement of YVONNE FEEHAN dated 17 September 2024.



.....
YVONNE FEEHAN

Ham Common – Unauthorised Encampment

On 26 July 2024, Ham Common was visited upon by 30 caravans and approximately 60 associated vehicles. The group were served with a Writ of Possession order and evicted using High Court Enforcement Officers on 1 August 2024.

The following information supports this report.

Photo received from Council's Parks Patrol Contractor (Parkguard), 26 July 2024



Photos received from Council's Parks Patrol Contractor (Parkguard), 27 July 2024





Photos received from Council's Parks Patrol Contractor (Parkguard), 30 July 2024











Photos received from Council's Parks Patrol Contractor (Parkguard), 1 August 2024

















King Georges Field, Ham – Unauthorised Encampment

On 5 August 2024, King Georges Field was visited upon by 40 caravans and approximately 50 associated vehicles. The group were served with a Writ of Possession order and evicted using High Court Enforcement Officers on 9 August 2024.

The following information supports this report.

Photos received from Council's Parks Patrol Contractor (Parkguard), 6 August 2024













Photos taken by Council's Parks Operations Manager, 7 August 2024



09:25

5G 



1000008962.jpg



JPG - 1 MB









Photos received from Council's Parks Patrol Contractor (Parkguard), 8 August 2024

















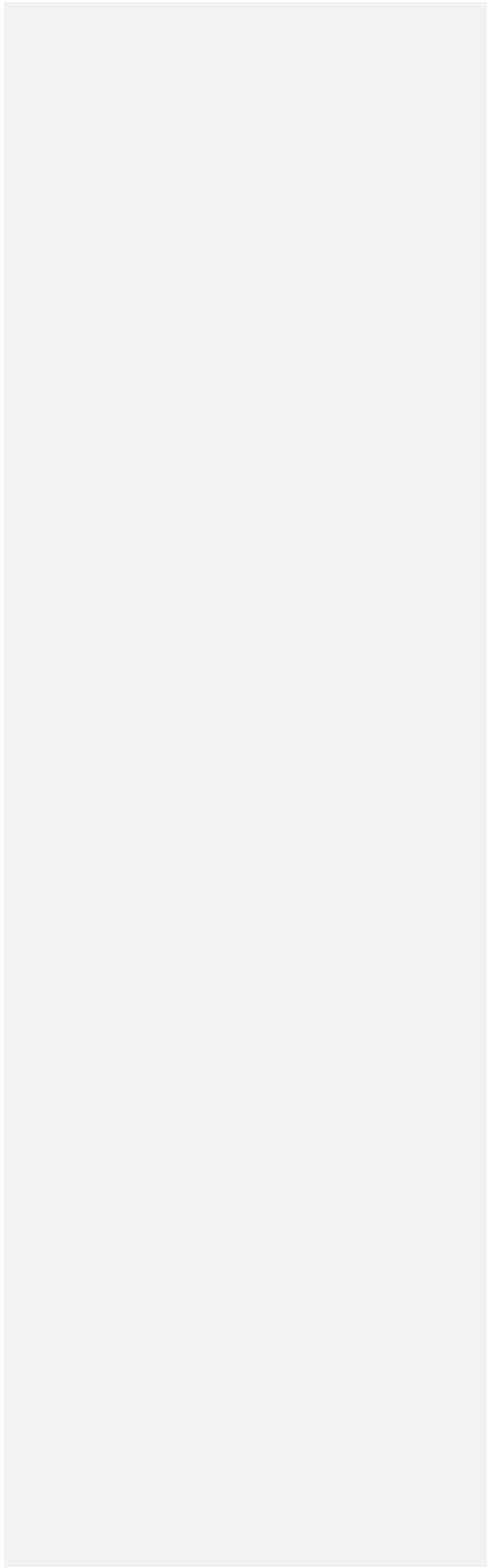
Ham Lands – Unauthorised Encampments

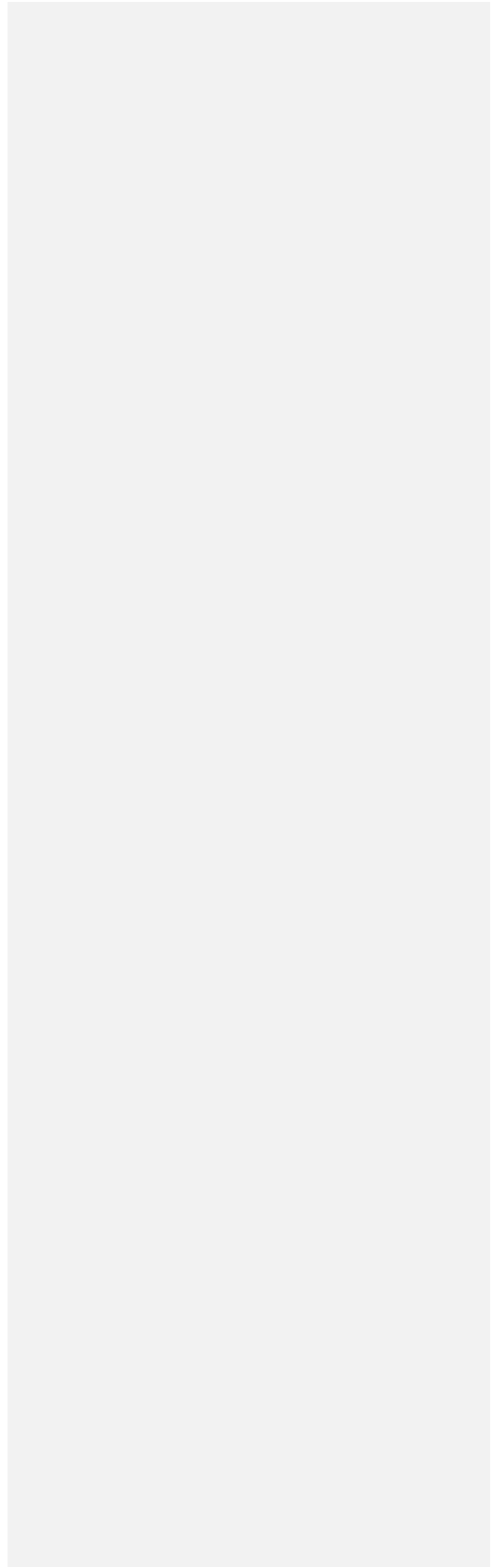
In May 2020, Ham Lands was visited upon by 14 caravans and associated vehicles. The group were able to remain for a period of up to 3 months to allow them to access healthcare during COVID-19 restrictions.

The following information supports this report.

Photos obtained from the Daily Mail Website, 19 May 2020





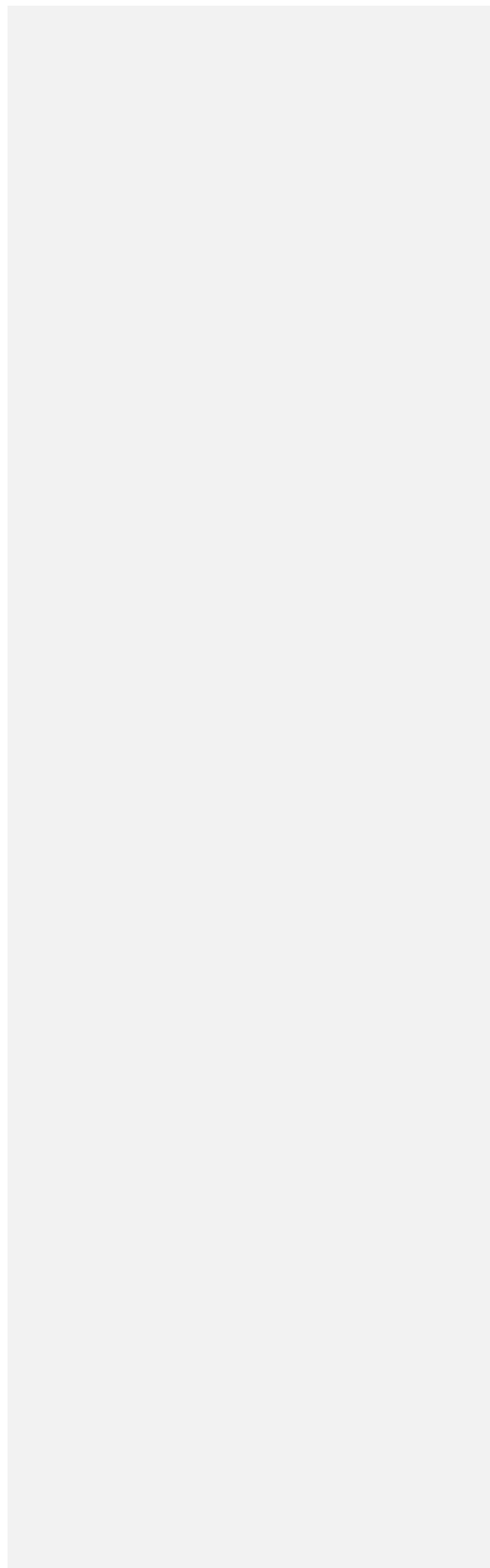


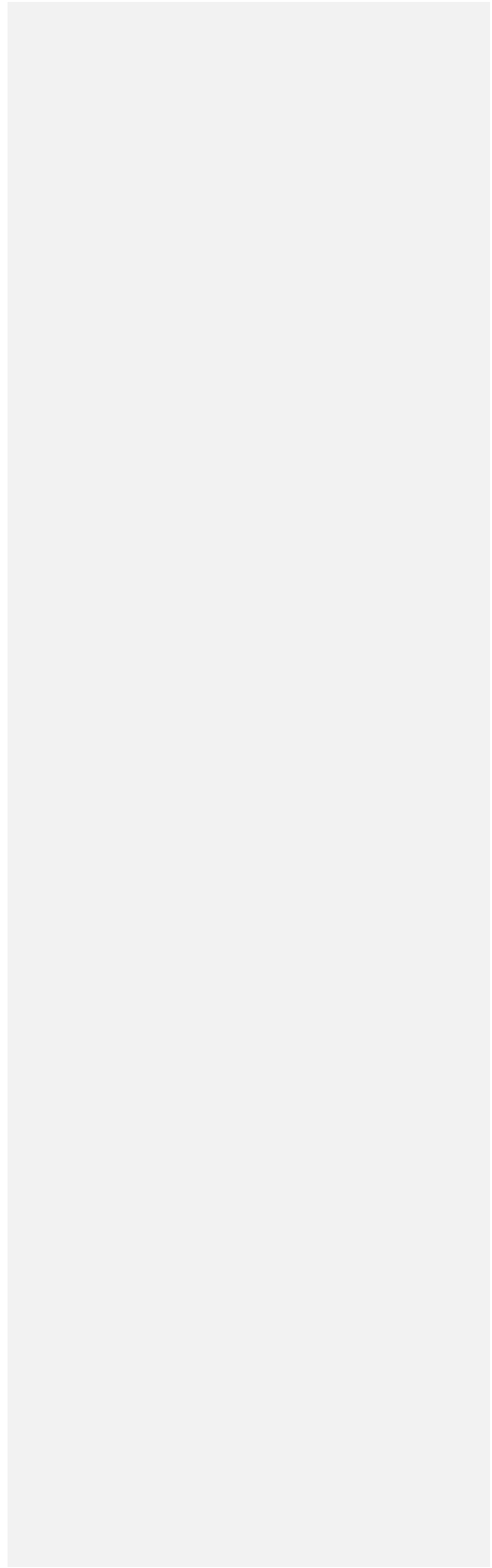
Kew Green – Unauthorised Encampments

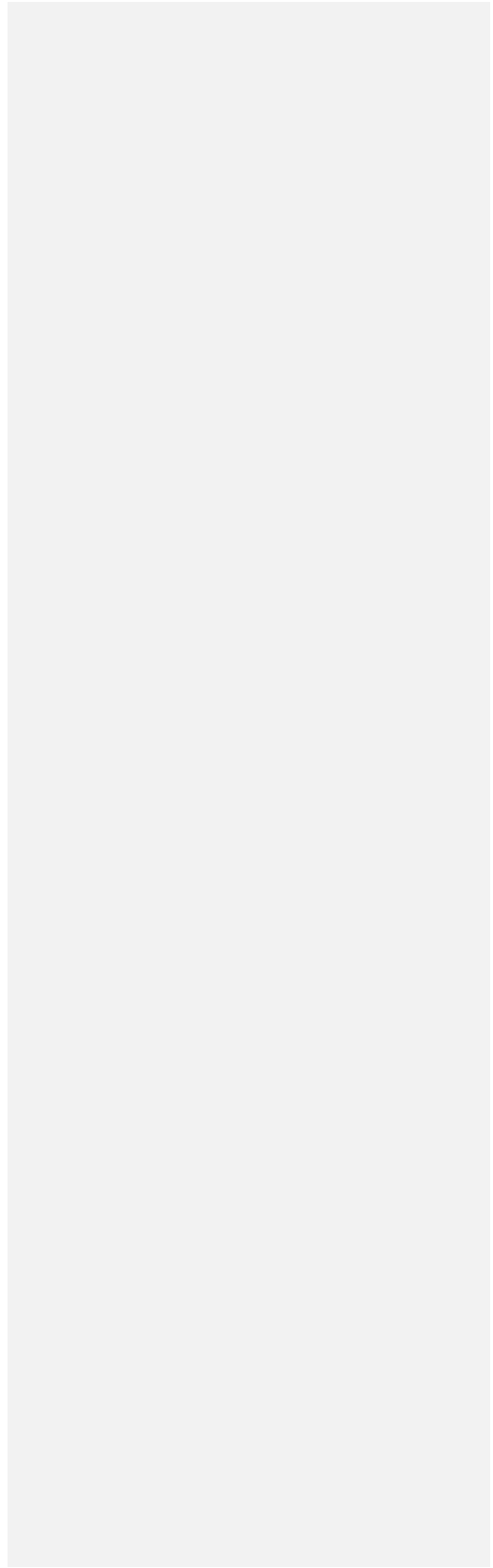
On 25 May 2021, Kew Green was visited upon by 14 caravans and associated vehicles. The group remained until 1 June 2021, until an Order for Possession was secured remove the Travellers.

The following information supports this report.

Photos received from Council's Park Guard service, 27 May 2021







On 2 June 2023, Kew Green was visited upon by 15 caravans and similar number of supporting vehicles (cars & vans). The group left on their own accord on 5 June 2023.

The following information supports this report.

Photos received from Council's Park Guard service, 2 & 4 June 2023





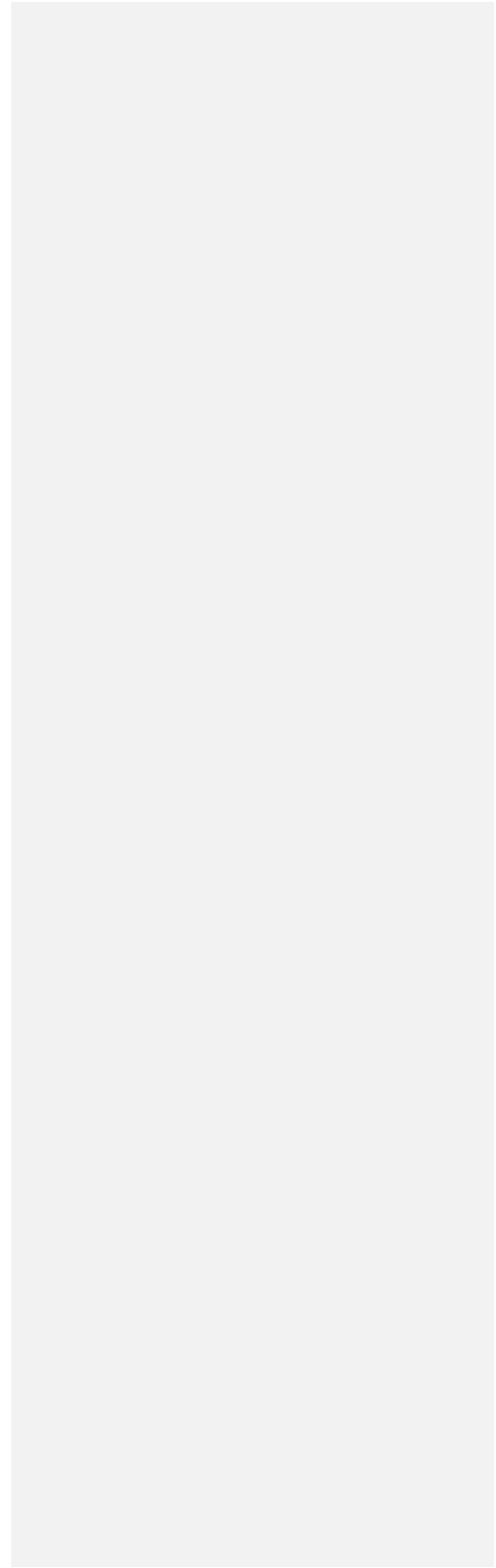
Ham Riverside – Unauthorised Encampments

On 14 May 2020, Ham Riverside was visited upon by 7 caravans and 10 accompanying vehicles. The group only left once served with an injunction (4 June 2020).

The following information supports this report.

Photos received from Council's Park Guard Services, 14 May 2020





Old Deer Park – Unauthorised Encampments

On 12 July 2019, Old Deer Park was visited upon by 8 caravans and 13 vehicles. The group left on their own accord the following day (13 July 2019).

The following information supports this report.

Photos received from Council's Parks Patrol Contractor, 22 May 2020



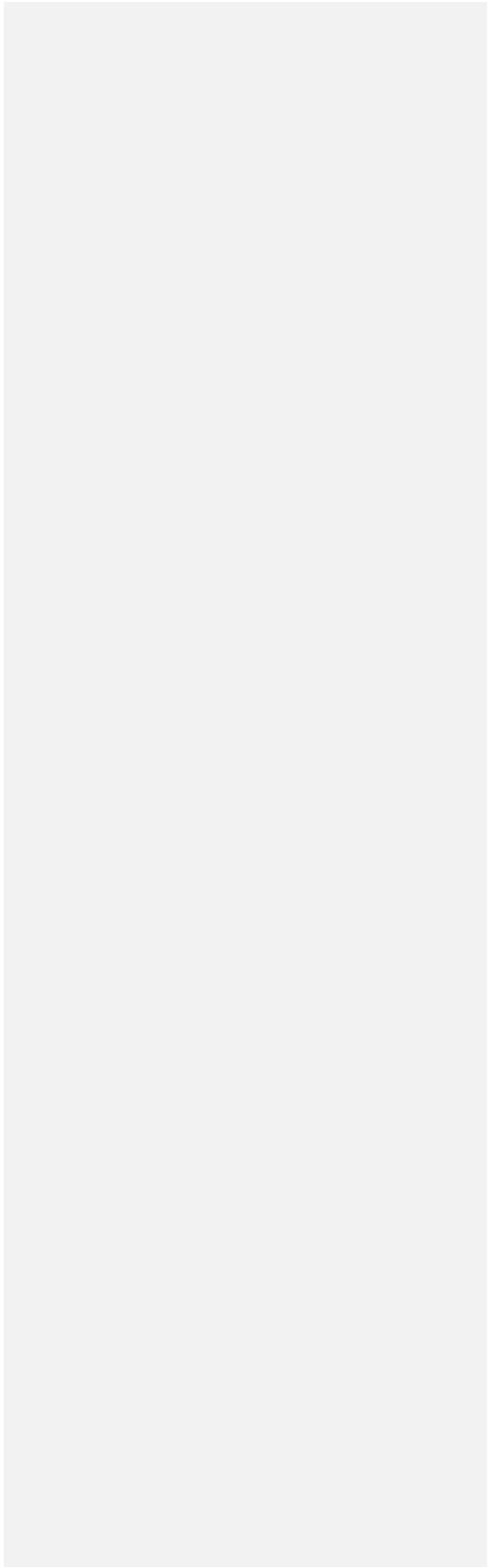
Richmond Green – Unauthorised Encampments

On 14 September 2023, Richmond Green was visited upon by 38 residential vehicles, including 'dozens' of caravans. The group remained for one day before they were served with a notice to leave under Section 77 (1) of the Criminal Justice and Public Order Act 1994.

The following information supports this report.

Photos obtained from the Daily Mail Website as at 15 September 2023





IN THE HIGH COURT OF JUSTICE

Claim No. KB-2024-

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-

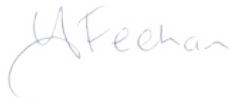
**(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT AND /
OCCUPYING FOR RESIDENTIAL PURPOSES (including temporary
accommodation) WITH OR WITHOUT VEHICLES AT ANY OF THE 6 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON
THE SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 6 SITES WITHIN
THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON THE
SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

Defendants

EXHIBIT "YF6"

This is Exhibit Sheet "YF6" referred to in the Witness Statement of YVONNE FEEHAN dated 17 September 2024.



.....
YVONNE FEEHAN

From: [REDACTED]
Sent: 01 August 2022 22:28
To: Yvonne Feehan; [REDACTED]
Subject: Fwd: Kew Green. URGENT

Official

Hello,

Sending you the urgent message below - a traveller group have just arrived in Kew Green and are causing a disturbance.

Could you look in to it ASAP please?

Thank you!

[REDACTED]

Get [Outlook for Android](#)

From: [REDACTED]
Sent: Monday, August 1, 2022 10:18:35 PM
To: [REDACTED]
Subject: Kew Green. URGENT
Hello

A group of travellers are in the process of setting up camp on the East side of Kew Green. The noise is already intolerable.

The council needs to take immediate legal action to have them moved on. It also needs to take positive action to stop this recurring problem.

Thank you

[REDACTED]

Sent from my iPhone

From: Trees & Parks <Trees&Parks@richmond.gov.uk>
Sent: 02 August 2022 11:02
To: Yvonne Feehan
Subject: FW: Objection to travellers on Kew Green

FYI

From: [REDACTED]
Sent: 02/August/2022 10:04 (BST)
To: parks@richmond.gov.uk, [REDACTED], [REDACTED], [REDACTED]
Subject: Objection to travellers on Kew Green

Dear Parks and Councilors
I'm sure you are already aware that last night 01/08/2022 a group of around 10 traveller families moved onto Kew Green.
I am officially raising an objection to this as they cause damage to the grounds and local area.
In addition to this they also cause significant business disruption to not just this business but other businesses in the local area. Every time we have reported thefts, intimidation, and harassment. (these have been called in to the police) but with 2.5 police personnel in the area there is simply not enough resources to deal with this adequately.
I would like to be kept up to date with your current status and what is being done to remove them along with the time in which they are expected to be removed in order to properly protect my business and its assets.
During this period I have to fund additional business support i.e. door and security staff during this period which is an additional and unwelcome cost to running a business.
I understand the council have been working hard in making legal moves to make it easier to move them on, however it is time that a physical preventative measure is discussed in respect of Kew Green. Whilst residents are also affected local businesses are shouldering the largest costs themselves which can no longer be sustained.
I look forward to the councillors replies
Further to this I am opening a discussion with the councillors included in this email, my local MP and the mayor's office as more need to be done to prevent such occurrences.

As a rate paying business I am disappointed that this situation is allowed to continue year after year.



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[REDACTED]

From: [REDACTED]
Sent: 02 August 2022 11:22
To: Yvonne Feehan; [REDACTED]
Subject: Fw: Travellers on Kew Green

Official

Hello,

I know you're already on the case, but can I flag the waste issue below as well.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: 02 August 2022 11:13
To: [REDACTED]
Subject: Re: Travellers on Kew Green

And right now the kids are in the Kew pond... scaring the ducks and throwing waste in it! This is unacceptable!

On Tuesday, August 2, 2022, [REDACTED] > wrote:
Thanks [REDACTED]. But what is the long term solution? This is the 3rd time in 18 months!

On Tuesday, August 2, 2022, Bridges-Westcott, Alice (Cllr) <Cllr.A.Bridges-Westcott@richmond.gov.uk> wrote:

Official

Dear [REDACTED],

Thank you for your email and I'm sorry you're going through this.

I alerted our parks team last night and they are working on removing them from the site. Park guard is there this morning collecting all relevant information in order to do the legal proceedings.

If you see anything criminal taking place, then please do call the police as well.

Thank you,

[REDACTED]

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From: Trees & Parks <Trees&Parks@richmond.gov.uk>
Sent: 02 August 2022 12:30
To: Yvonne Feehan
Subject: FW: Travelers on Kew Green

FYI

From: [REDACTED]
Sent: 02/August/2022 11:31 (BST)
To: parks@richmond.gov.uk
Subject: Travelers on Kew Green

Hi. I just got a message saying you could help. There are travellers on Kew Green... again. This is the third time in 18 months. When is this going to stop? I do not feel safe. Also the petrol generators are a fire hazard on the dry grass!

----- Forwarded message -----

From: [REDACTED]
Date: Tuesday, August 2, 2022
Subject: Travelers on Kew Green
To: "[REDACTED]"

Official

Dear [REDACTED],
Please could you send an email to :
parks@richmond.gov.uk
With regards to the above.
Thank you
Kind regards,
[REDACTED]

London Borough of Richmond upon Thames
Tel: 020 8891 1411

For information about all the services provided by the London Borough of Richmond upon Thames please visit:
<http://www.richmond.gov.uk>

You can also follow us on Twitter for up to date information and news:
Twitter [@LBRuT_Help](https://twitter.com/LBRuT_Help)

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From: Trees & Parks <Trees&Parks@richmond.gov.uk>
Sent: 02 August 2022 14:03
To: Yvonne Feehan
Subject: FW: Kew Green situation

FYI

From: [REDACTED]
Sent: 02/August/2022 13:01 (BST)
To: parks@richmond.gov.uk
Subject: Kew Green situation

Hello

The council have suggested that I email you in order to add my name to those protesting about the presence of travellers on Kew Green.

I am also concerned for the welfare of the dogs on the Green accompanying the travellers.

As a local resident and council taxpayer, I wonder what can be done to prevent yet another recurrence of this outrageous act of trespassing? I have written to the Home Office about a possible change in the law but perhaps some sort of obstacles should be erected so that vehicles cannot access the Green. It would be a shame, but this is a threat to our safety and as such wholly unacceptable.

Yours,

[REDACTED]

From: Matt Almond [REDACTED]
Sent: 02 August 2022 15:16
To: [REDACTED]
Cc: Yvonne Feehan
Subject: RE: Kew Green - Traveller Incursion

Official

Dear [REDACTED],

Thank you for contacting the Parks Team at the London Borough of Richmond upon Thames, regarding the traveller incursion at Kew Green.

The Parks Team attended site this morning with the Police and carried out a full welfare check of all individuals and vehicles associated with the encampment. This information gathering is key to starting the legal process and the Council's Legal Team are now liaising with the High Court to secure a hearing date at the earliest opportunity, so that the Council can be awarded with a possession order. Upon receipt of a possession order from the High Court, the Parks Team will serve notice on the encampment and upon the expiration of notice, instruct bailiffs to remove all associated individuals and vehicles.

The Parks Team are not in a position to quote a timeline for enforcement against the encampment in question, however the Police have confirmed that additional resource will be assigned to monitoring the encampment, and our Parks Patrol Contractor (Parkguard) will also be monitoring the site closely, working in collaboration with Police Teams to share intelligence and evidence.

The Parks Team has explored the feasibility of introducing further railings around Kew Green, however, apart from planning constraints, finance and the ownership of land (Crown Estate); in our experience from previous traveller incursions at other sites such measures do not prevent unauthorised access. Historically individuals remove padlocks, or damage, vandalise or remove the gates/posts required for vehicle access. Previously when the Parks Team has tried to attribute such damage etc. with unauthorised access in the hope of using it as evidence of 'forced entry' it has been unsuccessful, as the individual(s) has/have to be witnessed carrying out such an act.

On behalf of the Parks Team, please may I take this opportunity to thank you for your patience and support in this matter.

Kind regards,

[REDACTED]

[REDACTED]
Parks Operations Manager

Serving Richmond and Wandsworth Councils

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

Email: [REDACTED]

From: [REDACTED]

Sent: 02/August/2022 10:04 (BST)

To: parks@richmond.gov.uk, [REDACTED], [REDACTED], [REDACTED]

Subject: Objection to travellers on Kew Green

Dear Parks and Councilors

I'm sure you are already aware that last night 01/08/2022 a group of around 10 traveller families moved onto Kew Green.

I am officially raising an objection to this as they cause damage to the grounds and local area.

In addition to this they also cause significant business disruption to not just this business but other businesses in the local area. Every time we have reported thefts, intimidation, and harassment. (these have been called in to the police) but with 2.5 police personnel in the area there is simply not enough resources to deal with this adequately.

I would like to be kept up to date with your current status and what is being done to remove them along with the time in which they are expected to be removed in order to properly protect my business and its assets.

During this period I have to fund additional business support i.e. door and security staff during this period which is an additional and unwelcome cost to running a business.

I understand the council have been working hard in making legal moves to make it easier to move them on, however it is time that a physical preventative measure is discussed in respect of Kew Green. Whilst residents are also affected local businesses are shouldering the largest costs themselves which can no longer be sustained.

I look forward to the councillors replies

Further to this I am opening a discussion with the councillors included in this email, my local MP and the mayor's office as more need to be done to prevent such occurrences.

As a rate paying business I am disappointed that this situation is allowed to continue year after year.

[Redacted]
[Redacted]
[Redacted]
[Redacted]

Kew

[Richmond upon Thames](#)

[TW9 3BH](#)

Tel: 020 8940 1208

Email: [Redacted]

Website: [Redacted]

Twitter: [Redacted]



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[REDACTED]

From: Trees & Parks <Trees&Parks@richmond.gov.uk>
Sent: 02 August 2022 16:32
To: Yvonne Feehan
Subject: FW: Travellers on Kew Green

FYI

From: [REDACTED]
Sent: 02/August/2022 16:20 (BST)
To: parks@richmond.gov.uk
Subject: Travellers on Kew Green

Dear Parks Department,

This is to let you know a group of travellers arrived this morning on Kew Green. If they could be dispersed as soon as possible that would be greatly appreciated.

Regards,

[REDACTED]

Sent from my iPhone

From: Customer Services Richmond <customer.services@richmond.gov.uk>
Sent: 03 August 2022 09:02
To: Yvonne Feehan
Subject: FW: Make an enquiry has been submitted - FS-Case-441609649

fyi

From: FormsNoReply@richmond.gov.uk
Sent: 02/August/2022 18:32 (BST)
To: customer.services@richmond.gov.uk
Subject: Make an enquiry has been submitted - [REDACTED]

An online Make an enquiry has been submitted.
The reference for this request is [REDACTED]
Which service are you interested in?: Other
Please specify: Traveller encampment Kew green
Your enquiry: Hi an illegal traveller encampment has set up on Kew green
Title: Mr.
First name: [REDACTED]
Last name: [REDACTED]
Email: [REDACTED]
Telephone: [REDACTED]
Would you like a copy of the enquiry to be sent to your email address provided?: Yes
Address:

Postcode	Select the address	addressNotFound
[REDACTED]	[REDACTED]	

From: Yvonne Feehan [REDACTED]
Sent: 03 August 2022 11:18
To: [REDACTED]
Cc: Trees & Parks
Subject: RE: Travelers on Kew Green

Dear [REDACTED],

No doubt you will have noted the travellers left site last night and we have cleaned up any litter left behind. Sites that have had railings cuts include Heathfield Rec, Ham Lands, Ham Riverside Pitches – these are all public open spaces not behind motorways.

I suggest you continue to discuss with your ward cllrs but in the meantime we are continuing to seek the Final Injunction which would mean we would be able to move them off usually within 24 hours from serving them. This is what we had in place before the courts withdrew and it was effective.

Regards

Yvonne Kelleher
Parks Service Manager
Serving Richmond and Wandsworth Councils

[REDACTED]
[REDACTED]
www.richmond.gov.uk / www.wandsworth.gov.uk

From: [REDACTED]
Sent: 02 August 2022 17:54
To: Kelleher, Yvonne [REDACTED]
Cc: Trees & Parks <Trees&Parks@richmond.gov.uk>
Subject: Re: Travelers on Kew Green

Yes and I have been worrying for our safety since they arrived on our green last night. I understand everyone is doing what they need to do to move them off the green but what is the long term plan? Which Greens in the borough have had their railings cut by travellers. Completely different on rough land behind a motorway with no one to see it happen. Even at night we'd hear the noise here. Which is a question which was asked by one of our neighbours just now. Maybe worth asking [REDACTED] to help us with this...

On Tuesday, August 2, 2022, Kelleher, Yvonne [REDACTED] wrote:

Official

Dear Ms [REDACTED],

Thank you for your email and I can understand your frustrations. We are applying once again for an Injunction for the site which would mean we would have powers to remove much much quicker (usually within 24 hours). To give some background on 6th March 2019 Richmond Council had obtained an Injunction against 'Persons Unknown' to prevent unlawful encampments at various green spaces in the Borough. This had the positive effect of deterring Travellers from coming to the borough and we saw significant drop in incursions.

On 16th October 2020 Mr Justice Nicklin, Judge of the High Court, ordered that a total of 38 Injunction cases be reviewed, and on 24th May 2021 the Court held that it was not possible to obtain final injunctions against Persons Unknown unless it was possible to identify such persons, and that it injunctions could not be enforced against newcomers (i.e. persons who came onto the land subsequent to the injunction being ordered). As a result, the Council's Injunction was discharged.

The judgment had potentially wide and serious consequences for a range of pre-emptive injunction orders frequently sought by local authorities to prevent unlawful or criminal behaviour for the benefit of residents. However, 14 Local Authorities, including Richmond and Hillingdon Councils (represented by Richmond's in-house legal team at SLLP) appealed to the Court of Appeal and on 13th January 2022 the Court of Appeal unanimously allowed the appeals finding in favour of the Councils. The Court of Appeal recognised and confirmed the benefit of such preventative injunctions.

So please be assured we are trying to get the Injunction back in place. Regarding the fencing, as I said previously we know from our experience in other parks and from other land managers this does not deter them from entering they simply cut gates/fencing and cause even more criminal damage.

This morning 8 police officers attended with us so we are being supported by the police but they will only use their powers to remove the travellers if they have sufficient evidence from residents that their lives are being impacted with ASB so I would urge you and your neighbours to report all and every issue you may experience as the more information they have the stronger the case.

Please be assured we are doing all we can, I have spent since 10pm last night dealing with this matter and working with our Legal Team to get all the necessary paperwork filed in High Court by 2pm today so that the process is as quick as possible.

Regards

Yvonne Kelleher
Parks Service Manager
Serving Richmond and Wandsworth Councils


www.richmond.gov.uk / www.wandsworth.gov.uk

From: [REDACTED]
Sent: 02 August 2022 16:09
To: Kelleher, Yvonne [REDACTED]
Cc: Trees & Parks <Trees&Parks@richmond.gov.uk>
Subject: Re: Travelers on Kew Green

Also can't you give them fines for parking on the green? Or can we park on the green?

And the petrol generators? Is that not a cause of concern? Health and safety? Are we allowed? I thought you get fines for that too? Sorry but feel like each time the response is there is a process you need to follow but no long term solution for the residents of Kew green.

On Tuesday, August 2, 2022, [REDACTED] wrote:

Thanks for your message but this is the same sort of message we receive each time (third time in 18 months) what measures are in place for this not to happen again... it takes about a week if not more because they usually come on a Friday so nothing happens over the weekend... it is not safe. Last time 5 of them came into my house! It was reported. This morning two of them jumped on a bus and harassed a polish women. I can't take my children to the green or playground as they are intimidating and again not safe. You talk about budget... but what about safety? What about the costs/ times each time this happens? Can [REDACTED] not get involved? Or our local councillors? Also this time last year (4 of August to be exact) one of the playground equipments was broken by the travellers... and still not fixed. When will that be sorted?

On Tuesday, August 2, 2022, Kelleher, Yvonne [REDACTED] wrote:

Official

Dear Samuel,

Thank you for contacting the Parks Team at the London Borough of Richmond upon Thames, regarding the traveller incursion at Kew Green.

The Parks Team attended site this morning with the Police and carried out a full welfare check of all individuals and vehicles associated with the encampment. This information gathering is key to starting the legal process and the Council's Legal Team are now liaising with the High Court to secure a hearing date at the earliest opportunity, so that the Council can be awarded with a possession order. Upon receipt of a possession order from the High Court, the Parks Team will serve notice on the encampment and upon the expiration of notice, instruct bailiffs to remove all associated individuals and vehicles.

The Parks Team are not in a position to quote a timeline for enforcement against the encampment in question, however the Police have confirmed that additional resource will be assigned to monitoring the encampment, and our Parks Patrol Contractor (Parkguard) will also be monitoring the site closely, working in collaboration with Police Teams to share intelligence and evidence.

The Parks Team has explored the feasibility of introducing further railings around Kew Green, however, apart from planning constraints, finance and the ownership of land (Crown Estate); in our experience from previous traveller incursions at other sites such measures do not prevent unauthorised access. Historically individuals remove padlocks, or damage, vandalise or remove the gates/posts required for vehicle access. Previously when the Parks Team has tried to attribute such damage etc. with unauthorised access in the hope of using it as evidence of 'forced entry' it has been unsuccessful, as the individual(s) has/have to be witnessed carrying out such an act.

On behalf of the Parks Team, please may I take this opportunity to thank you for your patience and support in this matter.

Regards

Yvonne Kelleher
Parks Service Manager
Serving Richmond and Wandsworth Councils

[REDACTED]
[REDACTED]
www.richmond.gov.uk / www.wandsworth.gov.uk

From: trees&parks@richmond.gov.uk <trees&parks@richmond.gov.uk>
Sent: 02 August 2022 12:30
To: Kelleher, Yvonne [REDACTED]
Subject: FW: Travelers on Kew Green

FYI

From:
Sent: 02/August/2022 11:31 (BST)
To: parks@richmond.gov.uk
Subject: Travelers on Kew Green

Hi. I just got a message saying you could help. There are travellers on Kew Green... again. This is the third time in 18 months. When is this going to stop? I do not feel safe.

Also the petrol generators are a fire hazard on the dry grass!

----- Forwarded message -----

From: [REDACTED]
[REDACTED]

Date: Tuesday, August 2, 2022
Subject: Travelers on Kew Green
To: [REDACTED]
[REDACTED]

Official

Dear [REDACTED]

Please could you send an email to :

parks@richmond.gov.uk

With regards to the above.

Thank you

Kind regards,

[REDACTED]

[REDACTED]

London Borough of Richmond upon Thames

Tel: [REDACTED]

For information about all the services provided by the London Borough of Richmond upon Thames please visit:
<http://www.richmond.gov.uk>

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Twitter [@LBRuT_Help](https://twitter.com/LBRuT_Help)

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From: [REDACTED]
Sent: 11 August 2022 13:37
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Travellers on Kew Green again (Case Ref: SO36636)
Attachments: 20220811_065602626_iOS.jpg; 20220811_065621876_iOS.jpg; 20220811_065643827_iOS.jpg; IMG_20220811_0001.pdf

Dear [REDACTED]

Thank you for your response, although you do not address the emboldened section of my email. However, in your earlier responses yesterday to other constituents, I note you said *“As you may already be aware, this kind of fencing has successfully prevented this issue on other greens in the borough and we hope it will prove an effective barrier and deterrent in this case. We believe that given the repeated nature of this problem, it should be possible to now secure the resources required to address this issue.”* I deduce from this that railings have been an effective measure in Twickenham, and that the total costs of the previous traveller visits, in terms of policing, parks patrol, welfare visits, legal costs and clean up make railings a cost-effective solution.

You say that ward councillors are *“exploring how best to make the case for this fence to council officers”*. (I’m not an expert in local government, but my understanding is that council officers serve the Council, and by default councillors, rather than the other way round.) Although the travellers have now left, I wanted to share with you some details of their departure in the hope that they might contribute to the case for extending the railings. I am also copying in Yvonne Kelleher, as the Parks team have hitherto appeared to be opposed to the idea of railings and I am aware the Ms Kelleher had an active role in instigating legal proceedings.

A couple of hours before their departure yesterday, we witnessed travellers throwing rubbish on the Green – and I don’t mean the odd bit of litter but whole bin bags tipped out in their entirety onto the grass, along with hundreds of pieces of paper. On closer inspection this morning, these appear to be multiple copies of a document, signed by Ms Kelleher and witnessed by what I assume to be the Council’s lawyers (a few pages of which are attached), outlining the incidents that had occurred and the steps that had been taken as part of the request to grant a possession order. I am also attaching a couple of photos of the litter which covered large areas of the Green and included numerous nappies, empty food cans and other food waste in various states of decay, as well as a surprising number of toys. Excrement from the accompanying dogs was also amongst the waste. The contractors clearing up this morning did an amazing job and deserve our utmost gratitude for a task they really shouldn’t have to do.

I do hope that those of you copied on this email will be able to attend the community meeting that the [REDACTED] [REDACTED] has kindly offered to host on Wednesday 17 August at 4pm.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 11 August 2022 09:37
To: [REDACTED]
Subject: Re: Travellers on Kew Green again (Case Ref: SO36636)

Dear [REDACTED]

I am sorry that the recent occupation of Kew Green has caused so many issues in the local community and I want to reassure you we are doing everything we can to move these vehicles on quickly. I know that your ward councillors are coordinating closely with the police and local authorities and that Cllr. Bridges-Westcott attended the site and spoke with the police late on Tuesday evening.

I believe that your ward councillors are supportive of a fence surrounding the green and are currently exploring how best to make the case for this fence to council officers. I have given them what support I and my office can offer in this regard and I hope that this campaign will be treated with the seriousness it deserves. I realise the frustration and concern caused by the repeated occupation of the Green and while I know both your councillors and council officers are working hard to remove the trespassing vehicles as quickly as possible, I do recognise that preventative measures are needed to prevent similar actions taking place in the future.

Thank you for getting in touch, if you have any further issues or problems, please don't hesitate to get in touch again.
Kind regards,

[Redacted]
[Redacted]

[Redacted]
[Redacted]

Any personal data [Redacted] staff members receive will be treated in accordance with [Redacted] privacy policy as detailed at saraholney.com/privacy-policy. Please email [Redacted] if you would like to exercise any of your legal data rights

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From: [Redacted]
Sent: 9 August 2022 17:42
To:
Cc: , <
Subject: Travellers on Kew Green again

Dear [Redacted],

You may already be aware that travellers have again arrived on Kew Green – only a week after their last visit. Whilst the last visit was relatively brief, and so presumably didn't trigger a costly legal process, there were certainly costs to local residents, council tax payers and your constituents in terms of policing, parks patrol and a significant clear up which included abandoned gas cannisters – of considerable concern in the current heatwave, not to mention several incidents of anti-social behaviour. The impact on local businesses is considerable too – the owner of Abyam newsagents was advised by the police, on a previous occasion that the best thing she could do was to close her shop.

This is, to my knowledge, at least the fifth incursion since I have lived here and the Council's go-to response has been to suggest legal action. Not only is this ponderous and expensive, it is absolutely not a deterrent – hence the repeat visits. In today's world of social media, it is hardly surprising that this is becoming a popular stop over for travellers.

Local residents have on numerous occasions suggested extending the existing white concrete post and steel bar railings around the perimeter of the Green but the response of the Parks Department* is that these will be cut through. Kew Green is directly overlooked by around 50 houses, the posts are concrete and the bars steel so would require very high powered and noisy equipment to cut through them - honestly, this is a totally spurious argument. The arguments in respect of Crown Land and planning consent are also an irrelevant diversion, given that there are already existing railings which could simply be extended, as indeed was the case historically.

Twickenham Green, as below, has more extensive railings, not dissimilar to those already on Kew Green but despite repeated requests to local councillors last year, I was unable to confirm my belief that this has prevented a similar problem there.

I am loath to involve the Council, and by implication, local council tax payers in the cost of a Freedom of Information request but believe that local residents have a right to know whether this has been an effective measure in Twickenham, and what the total costs have been for the previous traveller visits, in terms of policing, parks patrol, welfare visits, legal costs and clean up.

I hope that you will be able to use your influence with the Council to secure this information on behalf of your constituents without a formal Freedom of Information request.

[Embedded Image]

* The Parks Team has explored the feasibility of introducing further railings around Kew Green, however, apart from planning constraints, finance and the ownership of land (Crown Estate); in our experience from previous traveller incursions at other sites such measures do not prevent unauthorised access. Historically individuals remove padlocks, or damage, vandalise or remove the gates/posts required for vehicle access. Previously when the Parks Team has tried to attribute such damage etc. with unauthorised access in the hope of using it as evidence of 'forced entry' it has been unsuccessful, as the individual(s) has/have to be witnessed carrying out such an act.

Kind regards,

[Redacted signature]

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Any personal data [Redacted] staff members receive will be treated in accordance with [Redacted] privacy policy as detailed at [Redacted]. Please email [Redacted] if you would like to exercise any of your legal data rights.

From: [REDACTED]
Sent: 12 August 2022 14:27
To: [REDACTED] Yvonne Feehan
Subject: Fw: Travellers on Kew Green

Official

Hi both,

Could you take a look at the second paragraph about the grass and the alleyway please?

Thank you!

[REDACTED]

From: [REDACTED]
Sent: 11 August 2022 08:21
To: [REDACTED]
[REDACTED]
Subject: Travellers on Kew Green

Hello,

As you might well be aware there was a travellers incursion on Kew Green this week. It was the second time in the last two weeks.

While I'm happy to see the council crews already clearing up the inevitable mess, I would like to ask the council to inspect the little strip of grass at the top of Priory Road, bordering the Green where big piles of what looks like human excrement have appeared in the last couple of days, and also the alley leading to Haverfield Gardens which is often used as toilet.

I would like to ask what the plans are to prevent this from happening again. There was the widely publicised incident last year, twice and now twice in the space of only two weeks.

I have been a local resident for over 25 years, I walk my dogs on the Green and I walk there on my way to Kew Bridge Rail Station. It feels intimidating and unsafe.

I also want to point out the fire risk, especially in the current conditions. The travellers use generators and they have used barbeques and gas bottles. One spark is all it takes for a fire to start.

I trust the Council will take the steps needed to keep the residents safe.

Best Regards

[REDACTED]

From: [REDACTED]
Sent: 18 August 2022 17:07
To: [REDACTED]
Cc: [REDACTED]
Subject: Meeting of Kew Green area residents

Dear all

There was, yesterday afternoon, a meeting of people who live on, or close to, Kew Green along with operators of businesses. I am conveying, for your information and consideration, the key points discussed. I won't repeat detail from earlier emails which you can refer to if necessary.

1. Appreciation of support shown by councillors and our MP, but concern as to when this support would be converted into tangible action;
2. Recognition that the solutions desired (in terms of making the east side of Kew Green a less desirable target) was a more medium term issue as opposed to the high level of fear around another incursion over the bank holiday weekend;
3. Recognition of the prompt, extensive, and thorough, clean up operations following recent invasions;
4. Recognition that the council had instigated legal processes, but this is after the event and local residents had already suffered fear, stress, intimidation, assault and damage to property; and
5. Desire for a full, single, meeting with our councillors, MP and council executive officers to convey the depth and strength of feeling and to hear what was going to be done, when and how. Natasha Samuel (who I have copied into this email) was going to take forward the organisation for such a meeting, with a desire for this to be sooner rather than later albeit recognising the impact of the holiday season.

It is worth noting the following:

Short term

Numerous concerns over the bank holiday weekend. Fortunately, the majority were able to quell calls for residents to take matters into their own hands. Suggestions of parking cars to block entry to the green (whether residents or more likely the numerous Zip cars parked around the green) were aired. There were also suggestions of building a fence ourselves. As noted these ideas were largely constrained, but have not gone away.

Residents will speak with the Kew Horticultural Society (who have their annual show on the Green over the bank holiday weekend) to see if their marquees and stalls can be erected before the Friday afternoon as this may act as a limited deterrent. Also if interfered with would give grounds for police action.

Reference was drawn to The Police, Crime, Sentencing and Courts Act 2022 which became law in April 2022. It is understood that incursions of the sort we have seen are, under this legislation, potentially criminal offences. All that is required is for the occupier of the land (Richmond Council) to instruct the police to require the Travellers to leave and their failure to do so, immediately, is a criminal offence. It carries a fine and the ability for police to seize vehicles. Unsurprisingly residents are keen that the council instructs the police as soon as possible if an incursion arises and, secondly, that the police act with the requisite authority and resources to move them on. Most residents and business people were left with the impression that this was a readily available tool that they expected to be used. If nothing else this point has raised an expectation with local residents and businesses.

Medium term

Proposals previously communicated to you had the full support of residents. Frustration was expressed by some that these proposals had not been adopted when raised after previous incursions, but there was some (reluctant) acceptance that the position had now changed given the frequency of incursions.

The more militant were guided away from getting the work done themselves during a considered, if sometimes fractious, discussion.

The key issue for residents was when would vocal support turn into solid actions with deadlines etc. It was suggested that our councillors should table a motion for debate at council noting the trauma, loss of business and costs incurred as a consequence of the incursions with a motion to instruct the executive to implement actions to limit the risk of this happening by implementing the proposals made by residents, and supported by our councillors and MP. It was decided that this was best discussed with councillors at the proposed future meeting in case they felt there was a better way of dealing with this.

A number of additional ideas to those already raised with you were also discussed. Some of these were simply alternative ways of achieving the same objective, which some present felt were less likely to gain traction. However one simple, positive, suggestion involved a slight modification to the length of double yellow line parking restrictions which, if reduced modestly (approx 8m) could help to reduce the ease with which Travellers access the Green.

Overall the meeting was of the view that the status quo was unacceptable.

Policing

There was a lot of discussion concerning the policing of the last two incursions particularly. Numerous examples were given of here people felt that police had simply stood back and had not been prepared to intervene to protect them or their property. It was felt that there had been too few police officers present, and for too little time. It was recognised that on the last incursion police response had been quicker but there was a feeling that this was in the category of too little, too late.

There was a long list of offences committed where , simply put, nothing had been done.

It is recognised that operational policing matters are for the constabulary, and not the council. However the residents felt that they ultimately pay for the policing, in part via the local council, and that this needed to be addressed.

Additionally there was discussion of reinvigorating a Kew Green Residents Association to facilitate easier communication, and regular meetings with councillors and officers. This has been taken away for considering the number of local organisations (albeit with quite specific purposes) in existence already.

I hope that you find this helpful. As always I am more than happy to answer any questions, provide clarification of discuss more generally.

██████████
██████████

Sent from my iPad

IN THE HIGH COURT OF JUSTICE

Claim No. KB-2024-

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 6 SITES
WITHIN THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON
THE SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

**(2) PERSONS UNKNOWN DEPOSITING WASTE ON ANY OF THE 6 SITES WITHIN
THE LONDON BOROUGH OF RICHMOND UPON THAMES LISTED ON THE
SCHEDULE ATTACHED TO THIS ORDER MARKED "1"**

Defendants

EXHIBIT "YF7"

This is Exhibit Sheet "YF7" referred to in the Witness Statement of YVONNE FEEHAN dated 17 September 2024.



.....
YVONNE FEEHAN

[RESTRICTED – CONTAINS PERSONAL DATA]**Parkguard Incident Reports**

(Page 1 of 21)

Patrol No P089189

Report No R858202

Date 26/07/2024

Location Ham Common

Time In 21:32

Text ATTENDED A TRAVELLER ENCAMPMENT AT THIS LOCATION; P1 INFORMED. WE WERE INFORMED BY A TRAVELLER THAT THEY WERE STAYING HER DUE TO A FEMALE IN HOSPITAL GIVING BIRTH AND THEY WOULD BE LEAVING IN THE NEXT FEW DAYS. WE PROVIDED THEM WITH BIN BAGS.

Call Reference: HAM COMMON, Control-Room Received: ?, Patrol Received: 21:15 We attended this location due to receiving information from Richmond Careline that a traveler encampment was present on the common that had arrived within the last hour. We conducted a mobile patrol of the open space before starting a foot patrol towards the various vehicles. We contacted P1 to update him about the situation and inform that we would conduct a site assessment/welfare check. We approached the first couple of caravans where we were greeted by an IC1 male and his family who claimed that they were present because a female was in hospital giving birth and that they would be able to leave in the next couple of days. He claimed that there were no vulnerable persons on site. We asked if they would need bin bags which they agreed to so we patrolled back to the vehicle to grab a handful. We liaised with a couple of local residents who were curious what was happening. We informed them of the current situation, that we were following protocols and advised them to remain vigilant whilst the encampment is present. We patrolled back towards the site where we handed the black bin bags to one of the males who thanked us and spoke with a male driving his vehicle. We then began our patrol of the encampment, liaising with several adults/children informing them we were present to carry out a site assessment and complete welfare checks. All persons on the site were friendly and displayed no signs of aggression at any point during our patrol. We were told a different story by another male that the group were present due to a wedding taking place and that they would be leaving Tuesday at the latest- showing that there are discrepancies in their stories. We ascertained that at least one of the families is usually based in Bristol. There were a very large number of vehicles spread across the length of the common, including multiple driving in circles and around the perimeter making getting registration plates difficult. These vehicles were already causing damage to the grass including the cricket pitch. We systematically worked our way along the lines of vehicles and noted down vehicles/caravans from I1-I42. There were at least 6 dogs seen on site, several of which were very young/small, tethered to stakes put in the ground near to several of the caravans. There was a small amount of littering on site and fly tipping consisting of waste bags already building up around several of the trees. The majority of caravans has gas containers and generators. We contacted 999 whilst patrolling through the site as we had concerns surrounding the sheer number of people and the reckless driving across the common. We were informed that the Police had already been made aware of the situation but were thanked for the information and were given a CAD reference. We witnessed one vehicle driving at speed and beeping at a fox that was on the common which resulted in it being forced off towards the main road towards HAM COMMON WOODS. We didn't witness the fox being injured as it ran away. We returned to the vehicle where we liaised with another couple of residents to inform them of the situation and offer reassurance which they thanked us for. Our patrol was captured on BWV. We monitored the encampment and pond for a period and updated the relevant persons about our findings. This location will be monitored on future visits.

[RESTRICTED – CONTAINS PERSONAL DATA]**Parkguard Incident Reports**

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Tag Code	Pol-Ref (01) - Police References- CAD, URN, STORM
Reference	CAD 8364/26/07/2024
Patrol No	P089209
Report No	R858310
Date	27/07/2024
Location	Ham Common
Time In	14:55
Text	<p>ATTENDED TO MONITOR THE TRAVELLER INCURSION STILL IN SITU; PICTURES TAKEN RELEVANT PERSONS INFORMED. I OBSERVED A DEAD BIRD WHICH WAS DISPOSED OF.</p> <p>I attended this location, due to a recent traveller incursion, I parked my vehicle opposite the POND, I exited my vehicle and monitored for a period, pictures taken, relevant person informed. I returned to my vehicle and made my way around the perimeter and parked opposite the Cricket Pitch, observing several caravans parked on/around the Pitch, several vehicles were observed entering/exiting onto UPPER HAM ROAD, there was a light footfall of park users passing through. I again exited my vehicle and took further pictures of the caravans, cars and vans upon the OPEN GREEN SPACE, relevant person informed. I started a foot patrol of the Green, passing the POND in the direction of the traveller site, I observed a dead rook on the ground, which appeared to have been killed, other than by natural means, I briefly engaged with a nearby female from the travelling community, before removing the dead bird and disposing of it appropriately. I continued patrolling around the site, noting substantial amounts of littering throughout, mainly of empty juice/water bottles. I noted the previously reported caravans remain in situ, however several appeared to have changed position, each caravan appeared to be equipped with a small generator and 2/3 large butane canisters, concerns are due to the hot weather/direct sunlight this could be an health/safety issue. I was approached by 2 young males from the community, who asked me how long they can stay, I advised them an application will be made to the court as soon as possible, I noticed a small dog tethered to a kennel, there was no water/food present, I politely asked both young males if they could provide the dog with some water, due to the current heat, they advised they would ensure the dog was watered/fed. One of the two males left, I noticed a couple of deep/large holes around the base of a tree, exposing the root system, pictures taken, relevant person informed, several meters along there was damage to the Green of rutting, where there appears a vehicle has wheel spun, pictures taken relevant person informed. I observed vans/cars driving around also on/off the Open Green Space more frequently, and then appeared to park next to other caravans, there was tread marks throughout, also indicative they had been circulating the POND. I checked the CRICKET TABLE due to multiple caravans, were within the boundary of the Pitch and close proximity of the Cricket table. A spike had been removed from the Cricket Square and discarded on the ground, the chain marking a section of the Boundary had been removed, and the positioning for the stumps had been damaged leaving several large holes. I was approached by security staff, we updated/debriefed regarding the situation, when P1-P3 arrived and updated me surrounding the British vehicle index numbers, provided earlier. Officers departed the area advising they would return later, to ascertain if there are further issues that need addressing. The security team advised where they were going to park their vehicle, I briefed them of a high visibility presence also to continually monitor and log anything unusual. I returned to my vehicle, following a call from PO408 advising of his arrival, I departed the location and made my way over to BURNELL AVENUE, where I met with PO408 at 15:55PM. Once PO408 boarded the vehicle, we proceeded back to the</p>

[RESTRICTED – CONTAINS PERSONAL DATA]**Parkguard Incident Reports**

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above named, parked our vehicle along side the perimeter and proceeded to conduct a foot patrol. The first thing we noticed was the vehicle tire marks all over the grass area around the cricket playground and the caravans' parking site. We approached a group of male and female travelers with their children. We advised them to keep the area clean and tidy and to ensure all their rubbish was kept in one area under the tree for easier collection after their departure. They agreed to our request and stated they have been keeping the place tidy. We then checked by the small lake, where we saw four children. We ensured they were not getting into the water or disturbing the birds in the lake. They engaged with us, asking questions about the birds and mentioned they saw someone hitting a duck with a rock and killing it earlier. We advised them to stay away from the birds and not enter the water as it is dirty and contaminated by bird droppings. They agreed and thanked us for the information. We noted damage to the chain and the ground within the cricket square, which we documented with photographs. We believe this damage was caused by the travellers' vehicles driving on the grass. Afterward, we returned to our vehicle and monitored the site for a period before meeting with the security team overseeing the area. We updated them on the situation and advised them not to engage with the travelers but to monitor their movements and report any issues. We then proceeded to our next location. We returned to the site for reassurance and saw the suspects still driving their vehicles up and down the park on the grass and some were washing their caravans which will get the grass wet and cause more damage to the ground as they driving throw it. We monitored them from, distance and had a few local residence who stopped by us and talked about their frustration about the travelers being around the park and that they are happy to see us patrolling around. We received a call reporting some travellers parked their vehicles inside the green sport area around HAM HOUSE STABLES and that they are setting a camp site. We attended immediately where we noticed the gate was unlocked. We drove up to the suspects and saw two adults males IC1 and a women IC1 with about seven kids where the two males were setting up the tents and kids were running around and about. We spoken the male telling him that they should not be parking in here and how did they get in. He said that he drove in because the game was open and that he is aiming to camp with his family for the night and maybe he will go tomorrow. We told him that it is a council site and that he may get fined, he said he will be removing his vehicles the soonest he finish setting the tents and he will be locking the gate after.

Time Out 15:21

Patrol No P089209

Report No R858652

Date 27/07/2024

Location Ham Common

Time In 20:17

Text OBSERVED A CARAVAN BEING JETWASHED AT THE EDGE OF THE GREEN, OBSERVED SEVERAL VEHICLES FROM THE INCURSION
We returned to this location due to an ongoing traveller incursion. Upon approach we immediately noted a caravan being jet washed, positioned at the edge of the Green concerns are contamination of the soil, also if vehicles are moved when the ground is wet, this could potentially cause damage to the Open Green Space. We remained and monitored for a period, noting various vehicles from the travelling community circulating the OPEN GREEN SPACE, some occasionally existing/ entering, we were approached on several occasions by residents, who expressed their concerns, regarding their safety crossing the Green referencing said vehicles, they thanked us for attendance. We received a call from

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Parkguard Incident Reports

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our Client at 20:26hrs, reporting 2 vehicles having entered onto HAM RIVERSIDE PITCHES and appears a tent has been erected, unsure if associated with the travelling community at said location or people camping. We proceeded over to the said location, observing the vehicle access gate to be open. We conducted a slow mobile patrol with our light bars activated, crossing the OPEN GREEN SPACE towards the BASEBALL PITCHES. We parked our vehicle opposite vehicle I1, we engaged with an IC1 adult male P1 who was inflating a blow-up bed, we asked how he had gained access, P1 advised the gate was open and we will have to get a court order to remove them tonight. We advised him of the by-law breach and issued an advisory on this occasion, due to several young children were present, additionally advising it's a finable offence. P1 stated he will leave in the morning along with his brother P2 and both their wives/children, we witnessed P2s vehicle I2 parked slightly nearer to the Baseball Pitch. We returned to our vehicle and made our way back to HAM COMMON. We monitored for a further period, observing vehicles proceeded to travel back/forth across the Green, we then noted 2 large caravans hitched to their respective vehicles, however, didn't appear to move, they remained stationary. There were no further issues at this time. I returned PO408 to his vehicle on BURNELL AVENUE, then departed for the next location.

Outcome Code M, M-R

Time Out 22:55

(I1)

Type Other

Reference EM65RZU

Description SILVER FORD TRANSIT

Tag Number

(I2)

Type Other

Reference BG26EDV

Description BLACK NISSAN

Tag Number

Patrol No P089222

Report No R858563

Date 28/07/2024

Location Ham Common

Time In 13:49

Text ENGAGED WITH P1 IN REGARD TO PARKING. ENGAGED RESIDENTS.
 Prior to attending this location, I made my way over to HAM RIVERSIDE PITCHES, due to a camp site within close proximity to the BASEBALL PITCH and an unauthorised vehicle parked next to the tents. There was no parking available, so I parked my vehicle in front of said location's access gate, when I witnessed a vehicle I1 approaching the gate. I exited my vehicle and engaged with an IC1 male, who I will refer to as P1, as he exited his vehicle and

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Parkguard Incident Reports

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opened the gate, he stated he needs to pick his children up along with his wife, I advised P1 if he leaves I will secure the gate preventing him from re-entering, also issue FPNs against each vehicle and the encampment, P1 appeared indifferent. I moved my vehicle allowing him to exit, whilst he returned to his and departed from the area. I repositioned in front of the gate, then made my way on foot to ensure it was secured, I noted it had been cut and the U lock had been seriously damaged along with the casing which protects the lock from malicious damage, I called P2 requesting if a replacement lock could be obtained as a matter of urgency, pictures taken, relevant person informed. However there was no persons available, I pulled the gate shut, returning to my vehicle, when P1 returned with 2 IC1 adult females and 6 young children, I advised P1 I believe he is associated with the traveller community on HAM COMMON, and they will be entered onto the application for the pre court proceedings, also I strongly believe they had damaged the lock to enter/exit as I had witnessed the lock secured by a local resident earlier, there was no attempts to deny/confirm, both females made their way on foot across the field accompanied by their children. I then made my way over to the above named, where I remained and monitored for a period, I engaged with several local residents, who thanked me for my reassurance. Whilst observing cars/vans could be witnessed continually driving across/around the Open Green Space. I noticed a young IC4 male who appeared to deliberately kick a ball against one of the caravans, when noticing an IC1 adult male exit from the caravan, I noted him running along the perimeter to get away. I called the young male over and activated my BWV, I advised him of what I had witnessed advising him to apologise, the male began to approach us, I continued ahead and intercepted him, advising him I've advised the young male to apologise, he stated "that's fine and not to worry" as he has young children of his own, he then stated, however if this was any other of the community it could have a different outcome, I thanked him for his understanding, he returned to his caravan, I then returned to my vehicle. Whilst I continued to monitor, I was approached by local residents/park users, there were several allegations made of theft from local shops also defecating in the alleyways. I was then passed by a speeding vehicle, believed to be travelling approx. 45/55 MPH along HAM COMMON (road) towards UPPER HAM ROAD, I checked the index number of I2 which came back with results found. I remained and monitored for a further period, updating P2 of the ongoing issues, whilst providing a high visibility presence and community reassurance to park users/residents.

Time Out 16:58

(I1)

Type Vehicle
Reference EK65RZU
Description silver/ ford van
Tag Number

(I2)

Type Vehicle
Reference ND21HND
Description SILVER/TOYOTA
Tag Number NO RESULTS

[RESTRICTED – CONTAINS PERSONAL DATA]**Parkguard Incident Reports**

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Patrol No P089248
Report No R858783
Date 29/07/2024
Location Ham Lands
Time In 12:27
Text I drove towards HAM COMMON to conduct a cursory check of the encampment and pond for any major issues to report. The site appeared very similar to when I last witnessed it on Friday evening but there was littering scattered throughout as well as multiple bin bags left in the centre of the common. There were very few park users present and only a small number of travellers outside their caravans. No one was seen causing distress to the wildlife at the pond but there was minor littering surrounding it consisting of food packaging and a small single inflatable pool seen floating in the water. Several of the dogs were seen tethered to a stake or running free at the site, not kept under supervision or under proper control.

Outcome Code
Time Out 14:15

Patrol No P089267
Report No R858913
Date 30/07/2024
Location Ham Common
Time In 09:16
Text MET WITH P1, VARIOUS OTHER POLICE OFFICERS AND BAILIFFS TO ASSIST IN SERVING COURT PAPERWORK TO THE ILLEGAL ENCAMPMENT PRESENT; ON MEETING P1 I WAS INFORMED AN INCIDENT HAD TAKE PLACE WITH A GERMAN SHEPHERD DOG.
Call Reference: HAM COMMON, Control-Room Received: ?, Patrol Received: 08:00 We attended this location to meet with P1, various other Police Officers and Bailiffs to assist in serving court paperwork to the illegal encampment present the Hearing as well as the Particulars of claim for possession. On my way to this location I liaised with P1 who informed me that an incident had occurred involving a German Shepherd on site that had badly bitten a member of public is attending hospital for their injuries. He also informed me that a dog unit would be attending to sieze the dog to enable it to be assessed. I was informed by PS227 that she had witnessed I1, I2 and I3 with several male members of the travelling community parked outside of ST ANDREW'S CHURCH, coming and going to this location and loitering within the church yard. PS227 witnessed them with large water tanks taking water from the church. I met with PS227 before parking alongside HAM POND where we met with P1. We liaised with for a period about the plan of action whilst we waited for the bailiffs arrival. We began a foot patrol around the pond to check for any wildlife issues or damage to the land. We came across several areas with human excrement, some of which had been smeared across the grass as well as a large number of dirty tissues at the perimeters of the pond. There was a pile of grass clippings approx 1 metre wide with wildflowers fly tipped nearby. We came across a large amount of littering inside the pond itself consisting of plastic bottles, a plastic cricket wicket/bat as well as a couple of small inflatable paddling pools. Some sort of substance had been dumped into the water which

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was photographed along with the rest of the littering to forward to the relevant person. We liaised with a female local resident who expressed her fears towards the German shepherd that still appeared to be loose on the common- we reassured her that the dog was being dealt with appropriately. We passed the dog which we ascertained had since been tethered to a stake pushed into the ground but it was barking at passers by. A large number of Police units arrived including EMT, RDT, LZP, RBM, QDK and dog units HR and RGC. We monitored the site until the bailiffs P2 and P3 arrived inside I1. We greeted P2 and P3 as well as several of the officers before being approached by a couple of males in their vehicles on the common asking what was happening. P1 explained the situation to them, that the hearing is set to take place on the 01/08/2024 and the fact that the court paperwork would be served by the bailiffs now. The males were understanding and accepted that we needed to carry out our roles. We then separately assisted P1, P2 and P3 around the encampment so that the 35 notices could be handed out to every caravan and then attached to various trees around the perimeters which was captured on BWV. DH729 monitored whilst P1 liaised with a couple nearby to the German shepherd to inform them of the dog bite incident that took place earlier in the day which they were unaware of. P1 explained that the victim was currently in hospital for their injuries and the owner of the dog needs to allow it to be seized for an assessment of the dogs behaviour to take place. The couple denied owning the dog and said the owner was not currently present before the male became slightly irate, denying that the dog bit anyone. P1 reasoned with the male for a period before we noticed a younger male had untethered the dog and began walking off with it. The dog unit ran over to liaise with the young male as well as the group that had started to form. They calmly explained that the dog needed to be seized for an behavioural assessment to take place but did not have concerns as the dog was standing calmly next to them. We then continued around the site handing out the court papers and assessing the site for damage. A phone was found on the grass near to one of the caravans so we approached the vehicle asking if they knew who the phone belonged to. The female on board claimed it belonged to her sister before calling her over. We asked the female to confirm it belonged to her by unlocking the phone before she thanked us for handing it in. There were large numbers of fresh tyre marks on the grass, littering scattered throughout as well as multiple full bin bags that had been left surrounding the trees in the centre of the common. A lot of the bin bags had been ripped open by foxes but some were left untied so we could see garden waste inside a few of them. The cricket net had been badly damaged as the centre section of the net had been pulled down and there were 10 young children playing inside it. There was a section of grass that had been burnt with an unknown burnt item left behind. One of the trees had been stripped of its bark with a sharp tool that was also photographed. There was a large pile of littering/fly tipping near to the edge of the common towards HAM COMMON WOODS which one of the males claimed was dumped by an unknown vehicle separate to the encampment. This pile consisted of food littering/waste, cardboard, kids toys, used nappies and open containers of washing liquid. CL later attended and picked up this waste along with the bags left in the centre. There were multiple small dogs at the site, many of which were tethered to stakes without proper access to shade or drinking water. We directed a couple of the occupants to provide drinking water to their dogs which they were compliant with. One put down a bowl of water just out of reach of the dog so we approached to push it closer- one of the dogs appeared malnourished, had diarrhoea and was extremely thirsty. We liaised with several of the young children including one that ran up to each of us to give a hug. Once all 35 court documents had been issued to the encampment/attached to the surrounding trees we were thanked by P1/P2 for our assistance on the site and informed that they would return on the 01/08/2024 if needed. We were also thanked by P3 who departed from the location. We were approached by a male local resident on his motorbike who asked if he was permitted to ride it on the common, to which we said he wasn't. The male then asked why the travellers were permitted to before expressing his concerns around some of the younger males present that had sexually

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harrassed his 16 year old daughter on the previous evening nearby to the common. The male confirmed that he had reported this incident to the Police so we reassured that we are continuing to maintain a high visibility presence and that the site is in the process of being moved on. We advised him to remain vigilant, he thanked us for our presence in the area..

Time Out 12:15

(I1)

Type Vehicle
Reference LY18 MXX
Description White Mercedes
Tag Number

(I2)

Type Vehicle
Reference DY22 KOE
Description White Vauxhall Van
Tag Number

(I3)

Type Vehicle
Reference DU21 OZT
Description VAN
Tag Number

(I4)

Type Vehicle
Reference 52-G-7400
Description VAN
Tag Number

Tag Code Pol-Ref (01) - Police References- CAD, URN, STORM

Reference CAD 7464/26/07/2024

Patrol No P089325

Report No R859362

Date 01/08/2024

Location Ham Common

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Time In

12:51

Text

ATTENDED WITH POLICE, BAILIFFS AND CLIENT STAFF TO OVERSEE THE TRAVELLERS LEAVING THE LOCATION

I returned to my vehicle, there were no further issues I departed for the above named, upon entry of HAM COMMON (road), through my observations, multiple caravans/vans appeared to have again repositioned around the open green space. I parked my vehicle opposite the Pond and commenced a foot patrol, multiple caravans have now parked on/around the cricket table/pitch. I patrolled anti-clockwise around the Pond, noting a large pile of green waste of a small tree, apple tree limbs and hedge trimmings, slightly further along was new/historic human excrement, some had been smeared across the grass, towards the roadside, there were substantial amounts of discarded tissues, scattered mainly around the water's edge, and local wildfowl foraging around the tissues, this could be a potential wildlife hazard/health/safety issue, pictures taken, relevant person informed. Upon approach to a small platform I noted an adult size pedal bike in the Pond, along with the following items of a large, discarded cardboard box, empty food containers, water bottles, I observed 5 coot chicks being led by a parent, having to navigate the floating litter, which is again a wildlife hazard. I continued to patrol the perimeter, there was several medium sized stones, had been removed from the Rock Garden and were now scattered around the water bed of the Pond, there was further human excrement/tissues in close proximity to the benches, nearby was a pungent smell of urine, next to a bin was fly-tipping of a discarded roof rack, pictures taken, relevant person informed, exact location (stays.trains.issues). I checked the Rockery, noting serious damage to not only the support wire, also the removal of the quarry stones, pictures taken, relevant person informed. Slightly further along, I observed the previously reported fly tipping of green waste remained in situ, however had grown in size, there was now 3 separate large piles of green waste, pictures taken, relevant person informed, exact location (host.bugs.envy). I continued my patrol towards the cricket square, all the poles previously surrounding the Pitch had been removed and discarded around the site, there was no trace of the chain. There was damage to the grass and multiple tyre tracks throughout, I patrolled along the central tree line, when I was approached by several young IC1 male from the travelling community asking if I was a Police Officer, I advised I have attended on behalf of the council, advising I am currently doing an assessment of how many removal vehicles I will need to remove the refuse bags, they thanked me then left. Placed around the base of each tree was copious amounts of fly tipping of green waste along with what appeared items from a house clearance that was mixed with refuse from the caravans, the contents from one of the bags had unidentified items burned and scattered around the floor, leaving scorch marks on the ground, pictures taken, relevant person informed. The area was quiet apart from several groups of young children, roaming the site, I checked the cricket net for any further damage, there was significant amounts of littering clustered around the edges, consisting of mainly fragments of the pre- court possession order, the centre column of the Net had been bent further than previously reported and the nets were stretched in areas, there was human excrement upon the fabric of the cricket table, along with littering of crushed empty energy cans. I was in the process of entering the other section of the site when I noted P1 arrive with 2 other officers and were making their way towards me. We conducted a joint patrol around the site, engaging with members of the traveller community, who continued to be polite, there area remained quiet observing several vehicles, occasionally enter/exit. P2/P3 we observed arriving, I updated P4 of the current issues also advising all teams were now present. I provided P4 with photographic evidence along with a small video. I joined P1-P3 whilst monitoring the area, waiting for the High Court Writ, we debriefed on how we are going to approach members of the travelling community. We were approached by multiple people, who expressed their concern, if the travelling community would leave today, we advised of the due process, they thanked us in the matter. We were approached by P5 who was concerned regarding the damage to the

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Pond and the immediate surrounding area, he advised us the Cricket Net was insured, so they can be replaced. We were then advised by P3 the High Court Writ has been sent through, P1-P3 made our way around to each caravan/vehicle, we engaged with the community advising the possession of land was to take from immediate effect. Members of the community asked if they could leave at 18:00 when the males return, we confirmed we would give them time to pack away their items and leave the area, they thanked us in the matter, we asked them where their next location would be, information received BASILDON ESSEX/LEEDS. There started to be a notable amount of activity of vehicles, entering onto the open green space, the female members of the community were clearing away small items and discarding full refuse bags onto the Green, multiple vehicles were observed being hitched onto their respective caravans

Time Out 21:12

(I1)

Type Vehicle
Reference YS23GHG
Description GREY/PERGUOE
Tag Number

Tag Code Disp-FPN (01) - Fixed Penalty given (LA)
Reference PS00365a

Tag Code Pol-Ref (01) - Police References- CAD, URN, STORM
Reference CAD 7464 26/7/24

KING GEORGES FIELD

Patrol No P089452
Report No R860608
Date 06/08/2024
Location King George's Field (Durdans Park)
Time In 09:09

Text ATTENDED TO REPORTS OF A TRAVELLER ENCAMPMENT THAT HAD ARRIVED LATE ON 05-08; TRAVELLERS HAD REMOVED THE BOLLARDS TO ENTER. ALL VEHICLES ON SITE RECORDED AND TIME FRAMES DISCUSSED WITH A TRAVELLER MALE. LITTER IN THE HEDGES, BINS OVERFLOWING.
 Call Reference: KING GEORGE'S FIELD, Control-Room Received: ?, Patrol Received: 08:00 We attended this location as a result of receiving intel from P1 that a traveller encampment had arrived late on the 05/08/24. We began a foot patrol starting within the car park where we ascertained that the travellers had gained access by removing three of the

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concrete bollards as well as the anchor which were seen lying in various places nearby. A couple of orange pulleys were also left on the ground so we suspect a winch was used to pull the bollards out of the ground. We photographed the damage to forward to the relevant person as proof of the aggravated point of entry. There was littering including food packaging, used tissues and excrement amongst the hedges at the edges of the car park. We were approached by a male in his early 50s asking what the legal process and time frame will be which we explained to him. He informed us his wife has a hospital appointment at midday in Luton which he has to drive her to. We began our patrol of the encampment, writing down the registration plate of every vehicle and caravan witnessed which is captured on BWV. We were approached by several different groups of males throughout our patrol asking questions about when they were required to leave and the legal process so we provided them with the necessary information. None of the travellers displayed any signs of aggression or attitude at any point. One of the males made comments about wanting to buy the land to build a house on it and who the relevant person is to contact whilst another referenced how wealthy the area was and 'joked' about how he wants to take their money to become rich. One male added that the encampment were planning to stay on the site until Sunday. We were contacted by P2 who informed us that he was caught up in Lambeth would be able to assist us at the encampment at some point during our shift. A couple of pairs of males arrived at the tennis courts with the relevant equipment who began playing. There were a very large number of caravans, cars and vans throughout the site as well as two wood chippers, most of which were parked at the perimeters (11-194). Damage had been sustained to the grass throughout by the various vehicles which was photographed. We established that most caravans had at least one female present inside, there were a large number of young children running around the site as well as babies being carried around. The travellers were not forthcoming about the number of occupants or any vulnerabilities. A large number of dogs/puppies were seen throughout, a couple of which were recognized from the previous encampment on HAM COMMON. A small number of dogs were running free across the field but the majority were tied with very short leashes to caravans, tree cages and benches. Only a couple of dogs had access to water and the majority appeared malnourished. Multiple areas were seen with dog fouling that had been left surrounding the caravans. Littering was also witnessed throughout surrounding some of the caravans and amongst the bushes consisting of food packaging and used tissues. The bin in the far corner near to the stables was heavily overflowing with littering, dog fouling bags and a pair of black shorts had been left. A blue plastic barrel had been fly tipped along with cardboard, some sort of goal/net and a couple of full black bin bags in different areas. Each caravan had several water containers/billy cans, a generator, long wires (some of which was damaged with wire tape fixed) and several large gas containers being used as well as a washing machine. At the far end of the field there was a roll of turf left but it didn't appear to have been taken from the cricket table. We greeted several travellers when passing and taking photographs. We returned to the car park where we noticed a couple of signs attached to the fencing surrounding the tennis courts had been ripped off. We checked the vehicle access gate to the side of the courts alongside SD Rosie where we saw that the padlock was left closed but hanging from the chain leaving it unsecured. We returned to the vehicle to monitor before contacting P3 to update him on the encampment, sent across the vehicle details, photographs and informed him about the access gate that had been left unlocked. After a period, multiple of the vehicles began driving across the open space before departing towards RIVERSIDE DRIVE. Some of the vehicles repeatedly left the location before arriving again shortly after. A small number of park users arrived in the car park before departing shortly after after noticing the encampment present. Police Unit RCD was also witnessed arriving that did a lap of the car park before departing 10 seconds later towards HAM STREET CAR PARK. At approx midday we carried out a mobile patrol of HAM COMMON WOODS to check for any unauthorized vehicles and fly tipping. We noticed one of the vehicles exiles from the current site driving out of HAM GATE AVENUE. We

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drove past ST ANDREW'S CHURCH noticing several previously reported pairs of boxers hanging on surrounding trees. We passed a CL vehicle parked in front of the church. Fly tipping consisting of several piles of green waste along with several used tissues had been dumped at what3words location: feast.herb.purely but no further vehicles were seen parked or loitering. We conducted mobile patrol of HAM COMMON where no vehicles were seen trespassing and the green space/pond was clear from any littering or fly tipping. We then drove into HAM STREET CAR PARK where there were a large number of vehicles parked and the previously reported fly tipping consisting of a duvet and garden waste was still present in one of the corners. We returned to KING GEORGE'S FIELD where we were approached by a local resident who lives on the corner of HAM COMMON who expressed his concerns and distress surrounding both encampments. He complained about the state of the common once the site had been cleared and has concerns about the damage that will be sustained to this site also. It began to rain heavily but large numbers of vehicles continued to drive across the field including the cricket pitches. A couple of young children were seen playing with a piece of string that had been tied high up to a section of the tennis courts. We remained and monitored for a period of time to continue to gather intel and to check for any unwanted/suspicious activity. We returned to KING GEORGE'S FIELD, liaising with P2 on our way who informed us he would be arriving in the next half an hour. We noticed three young males aged ten or below within the tennis courts with rackets, two of which began hitting the signage within the courts. When noticing us approaching them, one male stopped but the other continued smashing the signage which resulted in the sign on court 3 being destroyed and the one in 2 damaged. We warned them more than five times to stop which were ignored. The main culprit refused to stop when directed before the three boys spoke to us through the fencing. One of the boys claimed the main culprit has autism to which he denied and laughed. We warned the boys that they were on BWV and that they had committed criminal damage, which they didn't react to. All three males left the courts, hitting the bin and electricity unit as they left. The main culprit stared into a park users vehicle parked nearby to the courts entrance before walking over to our vehicle to ask about the dog on board. We monitored him before he joined the other boys on the open space. We then checked the new fly tipping seen in the corner of the car park consisting of large numbers of wooden posts with nails sticking out of them, a large yellow sandbag filled with garden waste and insulation foam. A piece of paper was also located near to the bin at the edge of the car park that had what looked like human excrement inside. We photographed this and captured it on BWV which were forwarded to the relevant person. Multiple vehicles continued to drive across the open space at high speeds, one van in particular drove in circles whilst paying close attention to our vehicle. P2 arrived at approx 1545 alongside another male officer who we updated on our findings and liaised with for a period. P2 informed us that one of the travellers had left his van parked outside the YMCA with a lone dog inside. The windows were only slightly cracked open and the dog had no drinking water which they were very concerned about. P2 then began patrolling around the field to search for 'Mr Hart' who was the owner of the vehicle with the dog inside. The young male who damaged the signage returned to our vehicle asking questions about SD Rosie and was witnessed throwing a glass cup into the bushes which we scolded him for. He then grabbed one of SD Rosie's rubber balls and ran off with it onto the tennis courts refusing to return it. There were now a pair of adults using the court appropriately who were being disturbed by the nuisance child. He eventually returned the ball by throwing it over the fencing. We liaised with the pair of females and males who collectively decided they didn't want to play any further despite paying because they were being badly disrupted. There were a handful of young children running freely around the courts, bouncing on nets, pushing a trolley around and had allowed a small dog inside. The gate at the far side of the tennis courts had been broken into so the gate was wide open allowing anyone access. We liaised with both pairs who complained that they had paid- we informed them to contact the council to get a refund and reassured that the encampment was being dealt with. We

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advised them to use alternative courts in the mean time for their safety and to avoid being disturbed when playing which they agreed to- they thanked us for our presence in the area. We then contacted P2 to inform him our shift was finishing and that we would return first thing in the morning. This location will be monitored on future visits.

Time Out 16:00

Tag Code Disp-FPN (01) - Fixed Penalty given (LA)

Reference PS00386a

Tag Code Disp-FPN (11) - Fixed Penalty given (LA)

Reference PS00390a

Patrol No P089480

Report No R860869

Date 07/08/2024

Location King George's Field (Durdans Park)

Time In 08:58

Text

ATTENDED TO ASSESS ANY FURTHER DAMAGE DUE TO THE TRAVELLER INCURSION; LITTER, FLY TIPPING AND HUMAN EXCREMENT FOUND IN AREAS. DAMAGE TO THE GATE TO THE PITCHES. ENGAGED POLICE OFFICERS AT THIS LOCATION IN REGARD TO THE DAMAGE.

I attended this location due to an ongoing traveller incursion, also to assess any further damage to land/equipment, fly tipping also various by-law breaches. I entered the car park and parked my vehicle opposite the TENNIS COURTS. I began a foot patrol checking the perimeter of the carpark, noting the previously reported fly-tipping of a yellow builders bag, multiple fragments of wood, with various sized nails/screws, remained in situ, along with substantial amounts of littering of nappies and empty food containers, mixed amongst the litter was human excrement and discarded tissues, pictures taken, relevant person informed. I checked the TENNIS COURTS, there was no persons present at this time, however there was littering of mainly sweet wrappers and several small segments of concrete. I then received a call from P1 informing me of damage to the gate leading onto HAM RIVERSIDE PITCHES, I advised P1 I was currently conducting an assessment of the area, once completed I will make my way over, he thanked me in the matter. I checked the vehicle access gate, to ensure there had been no damage/tampering, none was observed at this time, there was human excrement/tissues within several small clearings of the perimeter vegetation along with fly-tipping of a discarded cardboard box, previously containing a Bush 32 inch smart TV along with other house hold items, pictures taken, relevant person informed. I entered onto the OPEN GREEN SPACE taking note of the number of vehicles present, the area was fairly quiet and only the occasional vehicle would enter/exit, I was positively greeted by an IC1 adult male, who is a member of the travelling community and was curious why I had attended, I advised him I was conducting an assessment of the area, he briefly discussed the weather thanking me for the information. I crossed the CRICKET PITCH/TABLE noting there was multiple tyre tracks, crisis/crossing around the Pitch leaving slight rutting to the ground, there were several areas where

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vehicles had turned sharply causing circular tracks across the Cricket Table, pictures taken, relevant person informed. I patrolled the rear of the perimeter, noting next to the fence line of the PADDOCKS was a significant amount of fly tipping of 7 refuse bags and a medium sized cardboard box with 3 discarded rugs, slightly further along was fly-tipping of a large pile of wood chippings, and further fly-tipping of 6 refuse bags, human excrement in various areas. I went back around to the entry point, observing a small dog tethered to a bench barking, there appeared to be no water/food available. I returned to my vehicle and made my way over HAM RIVERSIDE PITCHES and parked in front of the vehicle access gate, immediately observing a grass cutter, parked where the gate had previously been positioned. I made my way on foot over to the driver, who advised me P1 had requested he blocks the access point to prevent any attempts to gain entry onto the land. The post/anchor had been removed from the ground, however remained locked to the bar gate and attained an open position, I called 101 advising of the criminal damage also the area is a NATURE RESERVE, concerns are animal welfare issues because there are several protected species of wildlife onsite, also adding to the report criminal damage caused to KING GEORGE'S FIELD. When I noted an unmarked police vehicle arrive and parked next to the entrance of HAM HOUSE, recognising P2-P4 make their way on foot over to me, I engaged with the officers regarding damage to the gate and the time window, which the damage had occurred. As there were no persons from the travelling community witnessed causing said damage, police would only intervene on a breach of the peace, no section 61 will be issued on this occasion and to continue with the possession of land. I observed contractors, Continental landscapes park opposite, I engaged with P5 who had attended to replace the post into it's rightful place, we observed the remedial works being carried out, also capturing on BWV, the replacement of the post/gate. I patrolled the encampment along with P2, to ascertain if there had been any further changes, when we were approached by a white van containing 2 IC1 adult males, they asked us how long they could stay, we advised court documents are going to be served today, he asked if we could delay, requesting if they could remain until Sunday, when a flatbed truck pulled along side us again with 2 IC1 males, one of the male's was hostile stating "we'll leave when we're ready" the other male attempted to defuse the situation, he also stated to become hostile, I informed him we're here to inform them and "not to shoot the messenger" the males in the flatbed truck then left, the male in the white van we originally spoke to stated he will be leaving Thursday, we returned to the car park. When we were joined by P6 who is a bailiff from Equivo and had attended to serve pre court documents. We were then joined by P7 who had arrived with the Borough Inspector, we all proceeded to make our way around the caravans, accompanied by police officers serving the court documentation to the occupants. We were joined by P7 who had attended with SW192 Inspector. We all accompanied P6 around to each caravan serving legal documents to the occupants, a couple of which weren't present. Vehicles driven by members of the travelling community were becoming notably active, and observed leaving the location, I pointed out to a couple of the officers to be mindful where they stepped due to the substantial amounts of dog fouling throughout. Once all the notices had been served, I assisted P6 to attach the remaining court documents, one to a nearby tree, two to the access gates, one on park signage and a further 3 to the railings. P6 thanked me for my assistance. I made my way over to P2-P5 who were stood by the Tennis Courts, when I noticed a naked young IC1 male Approx age 5/7 enter the rear gate of the Tennis Courts, 2 younger children, alerted the mother, who quickly made her way from a caravan next to the fence line. A couple of IC1 adult males were engaged in a game of pairs on court one, I advised them of the young child. The IC1 adult female claimed "when passing claimed " he is autistic". She then scooped the child up, returning to her caravan, the 2 young children remained on court one, attempting to play with several items that had been left, I politely requested them to leave and suggested it may be better for them to play on the grass, they immediately gathered their toys, exiting the Tennis Courts onto the OPEN GREEN SPACE, both males thanked me in the matter. I returned to my vehicle, which had

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remained parked on HAM STREET. I made my way into HAM STREET CARPARK, conducting a mobile patrol checking the heras fencing to ensure there was no tampering/breaches, none was observed on this occasion. I noticed a significant amount of fly tipping of 6 refuse bags, duvet cover and what appeared a dismantled wooden barrel, multiple fragments of wood with various sized screws/nails, which could be a health/safety issue. I drove back to said location and parked my vehicle in one of the bays, I remained and monitored for a period with police officers, we further debriefed regarding other issues, which were addressed. All units left the location. whilst I continued to monitor, the 2 adult males who had previously been playing tennis also left. I noticed 2 young IC1 males who I recognised from the travelling community, scaling the wire fencing of the tennis court and climb out over the top, 5 young children then entered the area via the back gate, and were observed in possession of various toys and a football, a couple of the children were observed pulling on the tennis nets, I noted one of the children, remove his lower garments and urinate on the net's. I was approached by several local resident dog walkers, who informed me of human excrement/tissues within HAM COMMON WOODS, expressing their concerns, stating they regularly walk their dogs in said area, additionally alleging the travelling community have been using a standpipe within ST ANDREWS CHURCH YARD, for personal hygiene purposes, stating multiple items of under garments are strewn around the entrance and around the parking area, I thanked them for the information, stating I will add the details to my report, they thanked me in the matter. Several vehicles were driving around the Green Space some at speed, concerns for the health/safety of young children/dogs left to roam the area, 6/7 vans exited onto HAM STREET in the direction of RIVERSIDE DRIVE, I called and updated P1, also provided evidential photos, I was informed security have arrived and have secured HAM RIVERSIDE PITCHES. I returned to my vehicle, conducting a mobile cursory patrol of RIVERSIDE DRIVE, HAMLANDS and URNELL AVENUE, checking perimeter security posts remain in situ. Under my observation there had been no damage/tampering at this time, I made my way over to HAM GATE AVENUE checking any vulnerable target areas, I noted the previously reported fly tipping of green waste remained in situ. I parked next to ST ANDREWS CHURCH to check/verify information provided by residents. I began my foot patrol, checking the entrance to the Church Yard, the area was clear, apart from a couple of personal hygiene products and water around a large surface area of the floor. I returned to my vehicle, whilst making my way back towards KING GEORGE'S FIELD, I conducted a mobile cursory check of HAM COMMON. I returned to said location and parked my vehicle opposite the Tennis Courts, I remained and monitored for a period, providing a high visibility presence, vehicles belonging to the travelling community, continued to enter/exit location and circulate around the encampment to various caravans, there were approx 6/8 young children entering the tennis courts, which were now littered with toys and a substantial amount of general littering. A dog lead appeared to have been attached to the surrounding fence and a couple of young children were pulling on the lead, other young children of Approx 2/3 roaming the Open Green Space, I was approached by residents on several occasions, enquiring about the procedures to clear the area, after a conversation and reassurance, they thanked me in the matter. I was then approached by an IC1 adult male, who appeared quite distressed, he advised me he allegedly witnessed 3 males believed to be associated with the travelling community, attempting to remove security posts on the edge of BURNELL AVENUE, venting his concerns if they access the area. I asked him if he was a resident, which he confirmed, I advised him to call 999 if any persons return and are seen removing the posts, additionally I will be informing the parks team, he thanked me in the matter. I made my way towards said area, conducting a cursory check of RIVERSIDE DRIVE, a gate leading to TEDDINGTON LOCK remained secure, however had been left open, once arriving at BURNELL AVENUE, I immediately called P9 to inform him of the situation, there was no response I left a voice mail. I began a foot patrol checking all the posts, ensuring they remained in position, all appeared in order at this time, I returned to my vehicle, travelling

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back the same direction I had taken noticing a white van parked on RIVERSIDE DRIVE next to the Children's Play Area, as I neared I could see the vehicle had Irish plates, I immediately informed P10, who advised she will contact security staff to attend. I thanked her in the matter. I departed the area for the next location.

Outcome Code Alert-RP, Disp-BAP, DISP-BWV, Disp-WA, M, M-R, Pol-Ref, TK, UOP-AP, UOP-E
Time Out 16:04

Tag Code Pol-Ref (01) - Police References- CAD, URN, STORM
Reference CAD 2134 07/08/2024

Patrol No P089522
Report No R861131
Date 08/08/2024
Location King George's Field (Durdans Park)
Time In 12:42
Text

ASSESSED THE TRAVELLER INCURSION; FLY TIPPING AND DAMAGE SECURITY POSTS. LITTER, NOS AND HUMAN EXCREMENT FOUND. SMALL DOG BIT A PATROL OFFICER ON THE BACK OF THE LEG. I1 AT THIS LOCATION ABANDONED, POLICE INFORMED.

I attended this location due to ongoing issues with a traveller incursion, fly tipping and various byelaw breaches. I parked my vehicle opposite the TENNIS COURTS, and began a patrol of the carpark, the damaged security posts remained laid on the ground, the previously reported fly tipping remained in situ, along with substantial amounts of new/historic littering of empty fast food containers and nappies, there was further amounts of human excrement/discarded tissues, nearby was 3 XL Nos canisters, and a full packet of balloons, which I confiscated, I ensured the contents of the canisters was fully expelled and disposing them appropriately. I continued to patrol along the side of the Tennis Courts, noting there was littering throughout of sweet wrappers and discarded nappies, I proceeded to conduct a thorough check of the perimeter vegetation, noting copious amounts of fly tipping of refuge bags along with human excrement/discarded tissues in the following areas, (latter.lobby.fully)(behave.dairy.report) as I continued along there was a discarded mattress conceal behind a nearby tree was a large cable reel, slightly further along was fragments of a second cable reel, (crass.punks.keen)(cheese.faced.placed). I entered onto the OPEN GREEN SPACE several small dogs ran towards me barking, a small black/white mixed breed dog bit me twice on the back of the leg, as it attempted to bite me again, I turned and shouted to it to stop, it continued to bark, however maintained a safe distance. I noted a quad bike parked next to one of the caravans and tracks along the grass leading to the vehicle, scattered throughout the Cricket Pitches was substantial amounts of littering, consisting of mainly empty water bottles. I continued to assess the perimeter of the SHOOTING RANGE/PADDOCKS, there was copious amounts of fly tipping of multiple refuge bags, various carrier bags containing food and empty food containers, discarded boxes of miscellaneous items, which could be a wildlife hazard, the previously reported wood chip pile had grown in size, nearby was a secondary pile of chippings that had been recently fly tipped, within close proximity was an open cement bag and the contents spilled across the ground, concerns due to contamination of the ground, opposite was further fly tipping of building waste, consisting of multiple fragments of Carex, masonry, dust sheets,

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wooden pallets and arcitraves, I noticed a second small quad bike parked next to a generator. I proceeded along the fence line of WALNUT ALLOTMENTS assessing the fence for damage/breaches, none was observed on this occasion, there was multiple refuge bags positioned next to the tree supports, I noted substantial amounts of dog fouling/human excrement in various areas of the perimeter, pictures taken, relevant person informed. As I crossed the Cricket Table towards my vehicle, I noticed what appeared a family accessing the Tennis Courts, an IC6 young male was observed entering with a football, I advised the young male football games are prohibited in the courts, when 2 young children, who appeared 2/3 years of age from the travelling community, entered via the back gate, and proceeded to run around the Courts an IC1 adult female then entered, I believed to be the mother along with a small dog, calling to the young children, who split and ran in different directions. The family I had spoken to decided to exit, I briefly engaged, when they advised of the damage to the YMCA by the travelling community, they stated they will make arrangements to attend another Tennis Court in the interim. I returned to my vehicle, where I remained and monitored for a period, whilst providing a high visibility presence and community reassurance to park users/residents. I received a call from P2 informing me of a vehicle he had witnessed earlier, which appeared to be abandoned on HAMLAND, I advised P2 I would conduct a foot patrol of the area, to ensure there was no further activity in the location. I made my way along with P1 over to HAM RIVERSIDE PITCHES, we briefly engaged with a dog handler securing the site, we crossed the pitches towards the Copes, there was damage to the OPEN GREEN SPACE indicative a vehicle had been turning sharply in circles, which could not only be a health/safety hazard also a potential danger to wildlife. We continued along the Bridal path, witnessing I1 blocking the path into the meadows, the nearside rear passenger door had been considerably damaged, by what appeared cutting equipment, we both checked the vehicle and found a log book with the owners details P4 along with an email address and contact number, this was removed due to GDPR to be secured on my vehicle, pictures taken, relevant person informed, exact location (rail.tigers.hints), due to concerns the vehicle has been stolen/abandoned and would be set alight, within a conservation area, police were informed, once details were provided, I was advised information would be passed to local SNT, we both checked around the filter routes, to ascertain if there has been further activity, we noted human excrement in several areas along with discarded tissues, within close proximity to I1. I returned to said location, again parking opposite the Tennis Courts, I noticed 2 young IC1 males from the travelling community attempt to enter the front access gate into the Tennis Courts, they both proceeded to urinate against the gate, I exited my vehicle however wasn't able to capture on BWV, one of the young male's, whom I have had previously engaged with, then scaled the fence utilising the gate levering himself over, I stated to the other young male to use the rear gate, he could seriously injure himself, I observed him make his way around the perimeter of the courts entering via the rear, I was then approached by an IC1 adult male from the travelling community, he asked if the community could purchase the land, I advised the area consists of 2 Cricket Pitches and common land, which belongs to Richmond Council, he pressed for extra time to remain, I reminded him of the hearing tomorrow, he appeared indifferent then left. I returned to my vehicle, when I was approached by P5, who wished to apologise for his aggressive behaviour towards me on a previous occasion, stating he shouldn't have behaved in such a fashion, I thanked his for the apology, it started to rain heavily P5 advised he's going to walk his dog, he left towards HAM STREET CAR PARK. when I noticed a flatbed truck, with MDF panels positioned at the sides of the bed of I2, which was loaded with green waste, enter onto the Open Green Space, and the vehicle proceeded to make it's way to the rear, I strongly believed said vehicle was about to dispatch the waste onto the pre-existing waste, so I made my way to the edge of the Green, with the intention of capturing said activity on BWV, however the occupants of the vehicle noticed my presence, and monitored me for a period, I checked I2 against an app plates didn't match registered, came back as a White Kia. There became notable activity

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on/around the Green of one particular vehicle, I3 who was now continually entering/exiting, I again conducted a vehicle check against an app, information was vehicle has no Tax/MOT and has been exported, I witnessed vehicle I4 enter at speed continually circulating the area, crisis/crossing the Cricket tables, I checked I4's index number against an app, information provided, no results found. I returned to my vehicle, again monitoring the location, when I was approached by an IC1 adult female P3 who advised me of the current issues with young children of the travelling community, constantly attending the location, she had been informed by an unknown source, several of the travelling community may attempt to steal some of the horses, she additionally advised she has stepped up security over the next couple of days, I thanked her for the information. I was then approached by several residents, who enquired about the court hearing and the due process, after a brief conversation, I advised them there is a court hearing tomorrow, they thanked me in the matter. I noticed the Green becoming notably busy with vehicle travelling between caravans and multiple vehicles were seen to exit onto HAM STREET, several vehicles remained parked next to their respective caravans, the 2 quad bikes I had noticed earlier, where being ridden around the Green and appeared to have a couple of young children sat on the tank, also driving across the rear Cricket Table. I observed several children of various ages enter into the Tennis Courts with large sticks attempting to hit balls that had been left, 2 young IC1 females then began to swing on the nets, it started to rain again, most of the children left apart from 2 young males, who were now throwing the balls to each other. I departed the area for the next location.

Time Out 19:56

(I1)

Type Vehicle
Reference FR13EZG
Description SILVER -MERC C220
Tag Number

(I2)

Type Vehicle
Reference HJ21WFH
Description FLATBED TRUCK/WHITE
Tag Number NO TAX/MOT

(I3)

Type Vehicle
Reference SK22TVG
Description SILVER/RANGER
Tag Number NO RESULTS

(I4)

Type Vehicle

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Reference	FP59AZU
Description	BLACK/MERC SUV
Tag Number	No Tax
Tag Code	Pol-Ref (01) - Police References- CAD, URN, STORM
Reference	CAD 4242 08/08/2024
Patrol No	P089539
Report No	R861330
Date	09/08/2024
Location	King George's Field (Durdans Park)
Time In	11:39
Text	<p>ATTENDED TO MONITOR THE TRAVELLER INCURSION; ENGAGED MALE WHO I INFORMED THE HEARING WAS AT 1130HRS. LITTER IN THE HEDGE LINE AND TYRE TRACKS ON THE VERGE. FLY TIPPING ON THE HEDGE LINE.</p> <p>I attended this location due to an ongoing travellers incursions, fly tipping, criminal damage and various by-law breaches. I parked my vehicle opposite the TENNIS COURTS, when a vehicle I1 approached me, I engaged with an IC1 adult male from the travelling community, he asked if the community would have to leave today, I advised the hearing is at 11:30hrs and we would be directed by the court, he advised it may take a couple of hours to pack/leave, I stated the community would be advised of the outcome, he then returned to the OPEN GREEN SPACE. I began a foot patrol, noting 8 young children aged approx. 2/3 years old, throwing unknown items around the Tennis Courts 3/4, I continued my patrol of the carpark, the area was clear apart from littering clustered in the hedge line, and tyre tracks on the verge, indicative vehicles attempting to access the bar gate. I turned back and entered the OPEN GREEN SPACE, I immediately noticed the metal frame for the boot cleaner, was laid on the Cricket Table, I was approached by 4 young children 2 IC1 females aged between 4/5 and 2 IC1 males between 9/11, we briefly engaged, whilst the young females attempted to pickup the foot cleaner, I laid it back on the floor for safety purposes. The young males were then called by a couple of IC1 adult females, I continued to engaged with the young females, when I noted P1 approaching and police unit KTY Parked next to the edge of the Open Green Space. I patrolled along with P1 to check the rear fence line next to the SHOOTING RANGE/PADDOCKS, we noted further fly-tipping of green waste and building materials, copious amounts of littering mainly empty food containers also security tags, indicative of theft. pictures taken, relevant person informed. We patrolled along the fence line of WALNUT ALLOTMENTS to establish if there had been breaches/tampering, the fence appeared in good order, however there was copious amounts of new fly tipping of masonry, roofing materials, within the following locations (puts.gangs.hiding)(orchestra.voting.occup), pictures taken, relevant person informed. We returned to the carpark, updating officers of the situation, there was the occasional vehicle entering/exiting. Police units LZG, NKC and MKX entered along with bailiffs P2-P4 and security provided by Equivo, we were informed by legal possession of land had been given and P5 was on route with the high court writ. I attended with bailiffs and a couple of police officers, visiting the individual caravans, with the intention of informing the occupants, possession had been granted. There were several caravans occupied at this time, we noted multiple small young dogs of approx. 8/12 week old had been tethered to the caravans and unable to access shade, I also observed there was no means for the dogs to access water, I knocked on one of the caravans, attempting to alert the owner and request</p>

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water for the dog which, however there was no response, there were concerns for animal welfare. We returned to the carpark and waited for the writ to arrive, when P5/P6 attended, I engaged with both P5/P6 regarding the unfolding situation and the vulnerability/security of several sites. Once the writ arrived, I attended again with police/bailiffs whilst the court documents were attempted to be served, additionally accessing the site, noting further fly tipping of refuge bags next to the Cricket Pitches and the perimeter fence of the Tennis Courts, along with substantial littering throughout, several vehicles of the travelling community started returning, P4 intercepted them advising of the Writ, they refused to take the paperwork, stating their leaving. Once completing our patrol issuing the legal documents. We remained and monitored, I engaged with local residents/dog walkers, providing reassurance. I noted a young IC1 male whom I recognise from the travelling community climbing the fence surrounding the Tennis Courts, I directed him to get down, when he became abusive, I stated regarding his safety, which he reiterated from when I had previously instructed him not to climb the fence, he eventually climbed down and left, returning soon after with a rod and aggressively striking the hedge line, I robustly instructed him to stop, he apologised and left towards the caravans. The area was becoming notably busy with vans/cars entering/exiting. The young IC1 male again returned and was accompanied by another young IC1 male of approx. 10/11 years of age, both engaged with police officers, who sat in their vehicle, both young males were observed entering the back of the police vehicle and engaging with the officers. One of the police units left, returning after a short period with sweets for the young males. I was informed by P6 of possible attempts by 3 members of the travelling community trying to access BURNELL AVENUE OPEN GREEN SPACE, I immediately returned to my vehicle and made my way over said location. Whilst on route I noted the vehicle access gate leading to TEDDINGTON LOCK was open, will return and secure. I parked my vehicle on BURNELL AVENUE, noting a security dog handler present, I approached his vehicle on foot, we briefly engaged, I advised him of a report I had just received, he confirmed there has been no attempts to tamper/breach the security posts. I thanked him for the information advising I will update relevant people. I returned to my vehicle and proceeded back to where I had seen the open gate on RIVERSIDE DRIVE, I parked my vehicle on the hard standing, exiting my vehicle to secure the gate. I again returned to my vehicle and continued back to ST GEORGES FIELD. I parked opposite the Tennis Courts, exiting my vehicle and approached P5/P6 on foot to report my findings, they both thanked me in the matter, I noted police officers were still engaging with the 2 young males in the back of their vehicle, when an adult IC1 male from the travelling community approached police officers, he appeared to attempt to negotiate regarding a time the community would have to leave, he then returned to his caravan, returning after short period and further engage with officers. I continued to monitor the location and ongoing activities, noting 2 quad bikes being ridden back/forth across the pitches, several of the caravans appeared to be hitched to their respective vehicles, and adult females appeared to be packing away various household items. We noted multiple vehicles begin to stack behind each other, indicative they were preparing to leave. One group of caravans started to leave in single file the main gate, we noticed a flatbed truck arrive laden with green waste, once the vehicle was able to access, it was witnessed driven at speed to the rear of the location and the load dispatched, was unable to gain a visual on the index number, I proceeded to make my way passed other vans/caravans beginning to stack, when I was approached by said vehicle owner, who advised me he will be leaving in 20 minutes, I conducted a risk assessment and deemed it unsafe to continue over to the vehicle. I returned to the carpark, noting a police unit leaving, a second set of the travelling community the began to leave, followed by the last police unit, who advised they were going to follow and establish which direction they community were heading. I remained with bailiffs, P5/P6 advised they were leaving, I advised I will update them when all vehicles had departed and complete an assessment of the area, forwarding any pictures of relevance, they both thanked me in the matter. All the vehicles had vacated the area apart from 2

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caravans and 1 van. I proceeded over to the caravans with P1 to ascertain why the caravans remained, we engaged with an IC1 young adult female, who advised her husband was stuck in traffic caused by the caravans leaving, however will leave as soon as he arrives. We began an assessment of the complete perimeter, there was copious amounts of fly tipping, littering and human excrement which was logged for clearance, P1 took pictures and forwarded to relevant persons, we made our way back to the carpark noticing a white van enter, I intercepted the vehicle, and engaged with an IC1 young adult male, he advised he won't be leaving tonight, I advised his caravans/vans will be seized if they remain, he stated "I was only joking " and continued over to the caravans immediately hitching the vehicles, once they vacated the area, P2-P4 thanked me for my assistance in the matter, whilst P1 organised securing the area.. I returned to my vehicle, updating P5/6 they thanked me in the matter. I departed the area for the next location.

Outcome Code Alert-RP, Disp-BAP, DISP-BWV, Disp-CP, Disp-WA, M, M-R, SCD, UOP-E

Time Out 20:00

(11)

Type Vehicle

Reference WR18HDA

Description white/van

Tag Number NO TAX/MOT

Patrol No P089571

Report No R861599

Date 10/08/2024

Location King George's Field (Durdans Park)

Time In 14:54

Text REASSURANCE AND HIGH VISIBILITY PATROL CONDUCTED; NO ISSUES SEEN. We attended this location to conduct a cursory check of the area due to recent reports of unauthorised traveller encampments. Upon arrival we parked our patrol vehicle and conducted our cursory check of the area finding no suspicious persons or vehicles. Whilst checking this location we found security mobile officers parked in front of various gates who appeared to be ok and in good order. From this location we then made our way to Hamm Riverside pitches where we found the same outcome and no suspicious persons or activity for concern. We then continued with our cursory check of the area and made our way to Hamm street car park and whilst checking this location we found no suspicious persons or activity for concern. We found the area to be busy with park users and local residents and only small amounts of littering around the area but no visible issues for concern. With the area appearing to be in good order we then made our way to Riverside drive and whilst checking this location we again found no suspicious persons or any signs of any traveller encampments or issues for concern. Once the check of these areas appeared to be in good order and with no visible issues for concern found we departed this location.

Outcome Code AIO, Disp-CP, Disp-WA, M, M-R, TK, UOP-AP, UOP-E

Time Out 15:15