

Witness: MN Almond
For: Claimant
Date: 07/08/2025
No.: 1
Exhibits: MA1-2

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. KB-2024-003315

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

LONDON GYPSIES AND TRAVELLERS

intervener

FIRST WITNESS STATEMENT OF MATTHEW
NEIL ALMOND

I, Matthew Neil Almond, of the London Borough of Richmond upon Thames, of Civic Centre, 44 York Street, Twickenham, London TW1 3BZ WILL SAY AS FOLLOWS:

1. I have been employed by the London Borough of Richmond upon Thames Council (“the Council”) since 24 February 2014. My position within the Council is Interim Parks Service Manager. I am duly authorised to make this statement on behalf of the Council.
2. I make this Statement further to the hearing before Mr Justice Dexter Dias on 14 February 2025, and his Order dated 14 February 2025 (the “Continuation Order”) continuing the Injunction Order of Mr Justice Freedman dated 22 November 2024 (the “Injunction Order”). There is now produced to me a bundle of true copy documents marked Exhibits MA1-2 to which I will refer.

May 2025 Unauthorised Encampment

3. On the evening of Wednesday 07 May 2025, I was informed by a resident that an unauthorised encampment (the “May Encampment”) had been established in breach of the Injunction Order. The May Encampment was on Ham Common, one of the 8 protected sites.
4. On the morning of Thursday 08 May 2025, I attended the May Encampment together with the Council’s Parks Patrol Contractor (Parkguard), and welfare checks of those present were conducted, revealing nothing of concern.
5. The May Encampment comprised 25 people, including 9 children ranging from approximate ages of 6 month to 9 years of age. 3 cars, 2 vans, 5 caravans, 2 camper vans, 3 large gas canisters, a generator and 5 dogs were also seen in the May Encampment.
6. Copies of the Injunction Order and Continuation Order were served on those present.

7. As the May Encampment was the first to be established on any of the 8 sites protected by the Injunction Order, the Council instructed the South London Legal Partnership (“SLLP”), the Council’s in-house legal service, to apply to the High Court for a Writ of Assistance to enable the Council to enforce the Injunction Order. I am informed and believe to be true that SLLP filed the necessary paperwork with the Court on Friday 09 May 2025.
8. On Sunday 11 May 2025, before SLLP received the sealed Writ of Assistance (the “Writ of Assistance”) from the Court on Monday 12 May 2025, the May Encampment vacated Ham Common of their own accord.
9. A small amount of general waste was left behind. Exhibited at Exhibit MA1 are photos of some of the waste left on site, and a photo of the waste collected.
10. The cost to the Council of dealing with the May Encampment, including Parkguard time, parks cleansing and waste disposal, grounds maintenance inspection, legal costs and Park Officer time was £3,529.57.

July 2025 Unauthorised Encampment

11. On the evening of Sunday 20 July 2025, I was informed by a resident that an unauthorised encampment had been established in breach of the Injunction Order (the ‘July Encampment’). As with the May Encampment, the July Encampment was located on Ham Common, one of the 8 sites protected by the Interim Injunction.
12. On the morning of Monday 11 July 2025, the Council’s Parkguard service attended the July Encampment and conducted welfare checks. No welfare concerns were uncovered. 4 caravans and 7 vehicles were noted.
13. I am informed by Parkguard and believe to be true that individuals present within the July Encampment were served with the Injunction Order, the Continuation Order and the Writ of Assistance. At 10:45, I instructed Parkguard to inform the July Encampment that they would be required to leave Ham Common by 17:00,

to allow those present time to prepare to leave and for members of the group currently away from the site to return.

14. To manage the process, ensure that the July Encampment left as directed and to enforce the Injunction Order if required, the Council instructed SLLP to arrange for High Court Enforcement Officers (“HCEOs”) from Equivo to attend.
15. The HCEOs were in attendance from 15:22 onwards, and I am informed and believe to be true that the Police were also in attendance. A copy of the HCEOs’ Incident Report and photos (the “Equivo Report”) are exhibited at Exhibit MA2.
16. I informed and believe to be true that the July Encampment had vacated Ham Common by 18:20 on 11 July 2025 and the HCEOs stood down shortly after 18:30. As per the photos provided with the Equivo Report, some bagged waste together with an amount of apparent green garden waste was left behind, which was collected by the Council once the July Encampment had left.
17. The cost to the Council of dealing with the May Encampment, including Parkguard time, cleaning labour and waste disposal, grounds maintenance inspection, legal costs, Park Officer time and the cost of instructing HCEOs was £4,946.74.

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.



Matthew Neil Almond

Dated this 7th day of August 2025

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Claimant

And

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

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

Defendant

EXHIBIT MA1

This is the exhibit marked "**MA1**" as referred to in the Witness Statement of Matthew Neil Almond dated 07 August 2025

Dated 07 August 2025







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Defendant

EXHIBIT MA2

This is the exhibit marked "**MA2**" as referred to in the Witness Statement of Matthew Neil Almond dated 07 August 2025

Dated 07 August 2025

STRICTLY PRIVATE, CONFIDENTIAL & PRIVILEGED

FILE NOTE

Matter: Persons Unknown – Ham Common
Date: 21st July 2025
Client: South London Legal Partnership – Byron Britton
Our Ref: 5399654
From: KLP

On Monday 21st July 2025 I was requested to attend Ham Common along with four of my colleagues to remove trespassers under the Writ of Assistance. I arrived at the site at 15.22hrs and whilst awaiting the arrival of my colleague's, I met with the park warden and made him aware of who I was. We discussed when they had been served etc and he pointed out the fact the injunction applied not only here but to a few parks in the surrounding area as well which I was aware.

Around 15.45hrs my colleagues started to arrive as did the Police shortly after, the warden and I spoke to them and once briefed we proceeded to the group. The warden had to leave to drop his parks van in Greenford by 17.00hrs and so he left as we began our approach.

We approached the trespassers, identifying just one male, five women and some children on site. I asked what time they were leaving and they advised the men would be back between 18.00hrs -0 19.00hrs, I did inform them that the agreement was for them to vacate by 17.00hrs and to ensure that they started to return by this time at least. They did say if they came back sooner they would leave earlier. I did reiterate the fact the injunction carried a number of parks in the vicinity so they would need to move out the area completely, which they understood and said that the warden had told them of that this morning and they were fully aware.

Around 17.05hrs we saw a blue van return and so I approached with the Police. As we approached four new men appeared, so I believe they all returned in the blue van. Everyone was very amenable and they said they were just waiting on one more van and hoped to be gone by 18.00hrs.

Around 17.40hrs a few caravans were hitched and the others had all packed away and legs were up. The caravan in the middle with a large awning had not yet been touched and so we assumed this was the missing vans caravan.

At around 18.10hrs the final van had returned and the last caravan was packed and everyone was in line ready to leave site they finally pulled away at 18.20hrs. We conducted a search of the site for environmental reasons but other than a few bits of rubbish everything had been bagged up and put together in various locations. We found no evidence of human waste and so the site appeared clean.

Photos were taken and I went to stand the Police down and report no human waste so the site was clean before leaving just after 18.30hrs.





















