

Witness: Joanne Capper
For: Claimant
Date: 18/11/2025
No.: 4
Exhibits: JC6

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

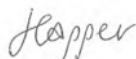
FOURTH WITNESS STATEMENT OF JOANNE
CAPPER

I, Joanne Capper, Principal Policy and Information Planner, for the London Borough of Richmond upon Thames, of Civic Centre, 44 York Street, Twickenham, London TW1 3BZ WILL SAY AS FOLLOWS:

1. This is the fourth statement I make on behalf of the Claimant. I make this Statement further to the hearing before Mr Justice Dexter Dias on 14 February 2025 (the "Hearing"). There is now produced to me a true copy document marked Exhibit JC6 to which I will refer.
2. On 07 October 2025, during a meeting of full Council, the Draft/Emerging Local Plan referred to in my previous statements was adopted as the Council's Local Plan. An extract from the minutes of the meeting is exhibited at Exhibit JC6.
3. No changes were made to the Local Plan relating to the provision of additional sites/pitches for Gypsies and Travellers, and therefore the now adopted Local Plan formally reflects the Council's position that there is no demonstrated need for additional sites/pitches. Nonetheless, as set out in my previous statements, the Council stands ready to review its position upon the release of the ongoing work being undertaken by the Mayor of London in this regard.
4. At the time of writing, the now adopted Local Plan is subject to one potential Judicial Review claim, which is still at the pre-action stage. It does not appear at present that the substance of the potential claim relates to matters relevant to these proceedings.

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.



.....

Joanne Capper

Dated this 18th day of November 2025

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2024-003315

KING'S BENCH DIVISION

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

B E T W E E N:

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

Claimant

And

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

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

Defendant

EXHIBIT JC6

This is the exhibit marked "**JC6**" as referred to in the Witness Statement of Joanne Capper dated 18 November 2025

Dated 18 November 2025

LONDON BOROUGH OF RICHMOND UPON THAMES

MINUTES

At a meeting of the Council of the **LONDON BOROUGH OF RICHMOND UPON THAMES** held at the Municipal Offices, Twickenham at 7.00pm on Tuesday, 7 October 2025

PRESENT:

The Mayor, Councillor Frost, in the Chair.

The Deputy Mayor, Councillor Vollum and Councillors Baker, Baldwin, Bishop, Bridges-Westcott, Brown, Butlin, Cambridge, Cardy, Chard, Coombs, Crookdake, Dalton, Dane, Davis, Ehmann, Fleming, Frieze, Frost, Gant, Giesler, Hale, Hull, Juriansz, Khosa, Lee, Mansfield, McNulty-Howard, Millard, Millum, Neden-Watts, Nicholson, O'Brien, O'Shea, Pollesche, Richards, Roberts, Sacks, Sehra, Varley, Vassileva, Vollum, Warlow, Warren, Wilson and Wren

Apologies for absence were received from Councillor Piers Allen, Councillor Ian Craigie, Councillor Charlie Engel, Councillor Jo Humphreys, Councillor Zoe McLeod, Councillor Rob O'Carroll, Councillor Tony Paterson and Councillor Richard Pyne

26. MINUTES

RESOLVED that the minutes of the meeting held on 8 July 2025 be agreed and signed by the Mayor.

27. ANNOUNCEMENTS

The Mayor noted with regret the recent passing of former Mayor Mark Cranfield Adams, who served as the representative for North Richmond Ward from 2002 to 2010 and held the mayoralty from 2007 to 2008. The Mayor extended condolences to his family and friends, informing the Council that his funeral had taken place last month.

The Mayor was pleased to share that the Richmond Swimming Club had held a successful sponsored swim the previous Friday, during which participating children swam with great enthusiasm to raise funds for the Mayoral charities. The event was well supported, and parents were warmly encouraged to make generous donations.

The Mayor announced that a wine tasting evening would take place at Saint Richard's Church, Ham, on Thursday, 13 November, from 18:30 to 20:30. She encouraged all Councillors who are able to attend. Further details regarding ticket purchases will be circulated in due course.

Finally, the Mayor informed the Council that the annual Christmas concert would be held at Clarendon Hall, York House, on Thursday, 4 December, from 18:30 to 20:30. Additional information about the event will be provided in due course.

The Leader of the Council acknowledged the second anniversary of the Nova Music Festival attack, during which many Israelis lost their lives or were taken

curriculum by the end of October 2025. Students, parents, and schools were consulted about the change of provision from Malden Oaks. Officers continue to review the suitability of the provision with students and their parents.”

As a supplementary question, Councillor Crookdake asked whether AfC is willing to consider allowing pupils to return to Malden Oaks if they prefer and sought clarification on the per-place funding cost compared to Beckmead Trust, and asked whether Malden Oaks will be invited to tender for placements next year.

In reply, Councillor Cambridge advised that each placement will be assessed individually, with the pupil's well-being remaining at the heart of any consideration. Two students have already returned to Malden Oaks. Officers have also engaged in fee negotiation with Malden Oaks. Councillor Cambridge indicated she was unaware of any formal requests from pupils or parents for a transfer. However, officers will review any individual case, provided it is cost effective, with any extra funding required for increased pupil placements needing to be sourced from the Dedicated Schools Grant.

The time for questions having elapsed, all remaining questions would receive a written answer.

32. REPORTS OF THE COUNCIL'S COMMITTEES

A. ENVIRONMENT, SUSTAINABILITY, CULTURE AND SPORTS COMMITTEE

Richmond upon Thames Local Plan 2024 to 2039 and update to the Local Validation Checklist and Supplementary Planning Documents (SPDs) Work Programme.

RESOLVED:

- a) That Council adopt the Local Plan.
- b) The Council delegate to the Head of Spatial Planning agreement of the final version of the adopted Local Plan (including minor text, graphic and layout changes that do not impact on the integrity of the Plan as approved by Council) and accompanying Policies Map, in liaison with the Chair of the Environment, Sustainability, Culture and Sports Committee.

B. FINANCE, POLICY AND RESOURCES COMMITTEE

Medium Term Financial Strategy.

RESOLVED:

That Council approve the Medium-Term Financial Strategy including the Flexible Use of Capital Receipts Strategy.

33. REPORTS ON JOINT ARRANGEMENTS AND EXTERNAL ORGANISATIONS

None.