

Witness: MN Almond
For: Claimant
Date: 08/09/2025
No.: 1
Exhibits:MA3

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

SECOND 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. This is the second statement I make in connection with this matter. 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 Exhibit MA3 to which I will refer.
3. On the evening of Thursday 14 August 2025, I was informed by a colleague from the ‘Pools on the Park’ leisure centre, that an unauthorised encampment (the “Encampment”) had been established in breach of the Injunction Order. The Encampment was set up on Old Deer Park, one of the 8 protected sites, and comprised of 13 caravans.
4. On the morning of Friday 15 August 2025 at approximately 10:00, the Council’s Parks Patrol Contractor (“Parkguard”) attended with me to conduct welfare checks of those present, which revealed nothing of concern. Upon completing the welfare checks, persons involved were served copies of the Injunction Order, Continuation Order, and the Writ of Assistance sealed on 12 May 2025 (the “Writ of Assistance”).
5. I instructed Parkguard to inform the members of the Encampment that they were to leave the site by 17:00, otherwise the Council would enforce the Writ of Assistance.

6. To manage the process and ensure that the Encampment left as directed, or to execute the Writ of Assistance if required, the Council instructed its solicitors, the South London Legal Partnership, to arrange for High Court Enforcement Officers ("HCEOs") from Equivo to attend. Equivo were then on site from 15:45 and I am informed and believe to be true that the Encampment finally vacated the site by 18:50 on 15 August. Equivo have since provided a report of their attendance (the "Equivo Report"), which is exhibited at Exhibit MA3.
7. A substantial amount of general waste was left behind in breach of the Injunction Order, as shown in the photos attached to the Equivo Report.
8. The cost to the Council of dealing with the Encampment, including Parkguard time, cleaning labour and waste disposal, grounds maintenance inspection, legal costs, Park Officer time and the cost of instructing HCEOs and repairs to damaged wooden post and rail fencing was **£4,796.60**.

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 8th day of September 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 MA3

This is the exhibit marked "**MA3**" as referred to in the Second Witness Statement of Matthew Neil Almond dated 08 September 2025

Dated 08 September 2025

STRICTLY PRIVATE, CONFIDENTIAL & PRIVILEGED

FILE NOTE

Matter: Old Deer Park, Twickenham Road TW9 2SF (“The Property”)
Tenant: Persons Unknown
Date: Friday 15th August 2025
Client: South London Legal Partnership – Byron Britton
Client Ref: File 337/196
Our Ref: 5557681
From: SW

We were instructed to attend Old Deer Park, Twickenham Road TW9 2SF (“the Property”) on Friday 15th August 2025 to execute a Writ of Assistance following a breach of the injunction. We arrived on site at 15.45hrs.

Upon first inspection, we found there to be 13 caravans parked around the perimeter of the property. We approached several of the travellers, informing them of the Writ of Assistance and that the Police would shortly be attending.

Following this, the travellers stated that they would be leaving the property and began gathering their possessions. As time progressed, we made several incursions into the park to observe the Travellers hitching up and ensure that possessions were being packed.

Throughout our time at the property, we maintained an open line of communication with the police, keeping them informed of any updates in the situation, whilst kept a few hundred yards away blocking the access to the main road.

All the travellers and their caravans had vacated the property at 18.50hrs, after which we began our inspection of the site. No personal items remained on the property, but there is a substantial amount of litter and waste. This was documented and photographed before we left the site at 19.00hrs.

Time on site: 3 hrs

SW











