

Claimant
R Bond
First
Exhibits:RB1 - 11
Dated:

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

Claim Number:

BETWEEN

THE LONDON BOROUGH OF REDBRIDGE

(Claimant)

And

**(1) MARTIN STOKES & 99 OTHER NAMED DEFENDANTS
(101) PERSONS UNKNOWN**

Defendants

WITNESS STATEMENT OF RICHARD BOND

I Richard Bond an Enforcement Officer employed by The London Borough of Redbridge, Redbridge Enforcement Team, PO Box 2265, Ilford, IG1 9XA ('LBR') will say as follows:

1. I make this witness statement in support of the Claimant's claim for an injunction pursuant to Section 222 Local Government Act 1972, Section 187B Town and County Planning Act 1990 and Section 1 of the Anti-Social Behaviour, Crime and Policing Act 2014 against the above named Defendants, and an application for an interim injunction pursuant to

Section 222 Local Government Act 1972 and Section 187B Town and County Planning Act 1990. The facts contained within this witness statement are within my own knowledge and are true, unless otherwise stated. Those facts outside of my own direct knowledge are true to the best of my knowledge and belief.

2. One of the responsibilities of my employment is to investigate and manage unlawful encampments within the London Borough of Redbridge under the provisions of Section 77 and Section 78 of the Criminal Justice and Public Order Act 1994. I have delegated authority from Caroline Bruce, Corporate Director of Place, to investigate and manage such matters.

3. For the past two and a half years I have been employed as an Enforcement Casework Officer with the London Borough of Redbridge (LBR). My duties include the investigation and prosecution of allegations of fly-tipping and other offences and provisions of the Environmental Protection Act 1990. Prior to commencing employment with Redbridge Council I served for 40 years with the Metropolitan Police Service. The vast majority of my service was within the Criminal Investigation Department (CID) at various supervisory and senior ranks, performing many roles within a number of CID departments.

4. The Council seeks an injunction in pursuance of the above mentioned powers on the following grounds:
 - a. The Council considers such action expedient for the promotion or protection of the interests of the inhabitants of its area: and/or
 - b. That it considers it expedient to seek an injunction to prevent further breaches of planning control: and/or
 - c. That the named and unnamed Defendants have threatened to, or engaged in criminal activity, anti-social behaviour, intimidation, general nuisance and consider it just and proportionate to make an order against the said Defendants.
5. In considering the expediency for the protection or promotion of the interests of the inhabitants of its area, the Council has considered the risk posed to human health and safety, detailed fully in the witness statement of Ioannis Ifantidis.
6. There is usually considerable cost to remove and clean-up large industrial and personal fly-tips, from persons who are not necessarily homeless or genuinely observing a travelling lifestyle. The types of encampments which LBR experiences tend to be seasonal, and those engaging in the fly-tipping are doing so on an industrial scale, often beginning to fill up sites within a few hours. This type of behaviour is not indicative of the

travelling community as a whole, and is a result of a small number of 'professional' fly-tippers within the travelling community. Fly-tipping is a criminal offence, and this behaviour is a form of organised crime, which benefits the perpetrators significantly, whilst at the same time creating a huge financial burden on public and private services. LBR is not equipped to effectively address these issues without an injunction.

7. In addition to the issues above the encampments have caused other issues which have has a significant impact on the inhabitants of the Borough of Redbridge and those working or visiting the Borough of Redbridge.

8. The London Borough of Redbridge (LBR) is located in the North East corner of the Metropolis of London. It is bordered by the London Boroughs of Havering to the South and West, Newham to the West, Waltham Forest to the North and West and Essex County Council to the North and East. Redbridge has a total land area of 46 million m², (17.7607 mile²), predominantly park and open space. With regard to land use, 45% of Redbridge is classified as Parks and Open Spaces, and 45% as residential. The third largest land use is Education – which at 1.58 million m², (0.6100414 mile²), accounts for 3.4% of the total. Industrial land, the fourth largest land use, occupies 0.67 million m², (0.2586884 mile²) – just 1.5% of Redbridge's land area. Redbridge is the 11th largest Borough in London, the Borough's population increased to 297,000 in

2015. It is projected to grow to 362,000 by 2030. 0.1% of the Borough's population identifies as being either White Gypsy or Irish Traveller.

9. LBR has, in the last two years, experienced a significant increase in the number of unauthorised encampments within its area. Use of existing powers, under s77/78 and s61 Criminal Justice and Public Order Act 1994 (CJPOA) are not proving effective in protecting the interests of the inhabitants of its area against the impacts these encampments are having on the Borough.

10. The Claimant has a current 'Unauthorised Encampment Protocol' which was agreed in March 2017 (version 2.5) [Exhibit RB/1]. In summary the Council's approach under this policy is as follows:

- **Initial attendance at scene** by Council Officers, Enforcement Team to establish whether there has been an unauthorised encampment and record exact location and ascertain ownership of land / site.
- **Record damage** caused gaining entry and damage to property
- **Health and safety** assessments staff, residents, trespassers
- **The nature and content** of the encampment, number of persons, vehicles and caravans present.
- **Determine land ownership.** (Land Registry checks)

- **Engagement** with persons present to ascertain their intentions and possible duration of stay.
- **Explain the Council's tolerance policy** in respect of their responsibilities within unlawful encampments.
- **Carry out welfare adult/children checks** and offer housing assistance.

11. LBR has a static caravan site, North View, Forest Road, Hainault, which is managed by the Council (although technically it is general fund land). This site is well established having been at the location for approximately 50 years. There are 16 pitches on site, one of which is let to a resident warden. Residents rent their pitch (approximately £115 per week), which also gives them exclusive access to their own permanent utility room. An assessment of traveller housing need was carried out in 2016, commissioned by LBR Planning which showed an overall extra need for one pitch by 2031.

12. The LBR uses the database Civica APP (Flare) system and the database (Confirm) system to record and administer requests for service/complaints received. It is to these databases that 'unlawful encampments' service requests and actions are logged. The information contained on (Flare) and (Confirm) have been placed on the system by a number of council

employees and officers and I have no reason to believe that any of it has been placed there incorrectly.

Background

13. Since 1st January 2016, to date LBR Council has recorded 50 instances of unlawful encampments by travellers on both public and private sites. A number of these have been repeat incursions. The below figures are those recorded by LBR – there have been further encampments and related incidents which have been recorded by the Metropolitan Police, and these are recorded in the statement of Elise Galletely. The 6 additional encampments noted by police and other witnesses are:

- a. 29/3/16 – 1051 High Road, Chadwell Heath
- b. 26/11/16 – Goodmayes Lane
- c. 16/4/17 – Bourne Court
- d. 13/9/17 – Farley Court
- e. May 2016 – Woodford Green
- f. 28/7/17 – Wanstead Flats

14. The following encampments are recorded by LBR:

Unlawful Encampments 2016 on both public and private sites	Unlawful Encampments 2017/18 on both public and private sites
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10	40
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15. The evidence over the last two years demonstrates that fresh encampments within the Borough are inevitable and that these encampments are likely to cause further nuisance, harassment, alarm and distress to the settled community and cost the council and businesses many thousands of pounds in evictions and the clean-up costs associated with fly-tipping and the other types of waste left behind by these encampments, unless prevented by an injunction. There has been, on these figures, a 300% increase in encampments recorded by LBR from 2016 to 2017. The encampments tend to increase in frequency from March onwards and will continue until around Christmas time. The encampments cost businesses, the Council, Police and the settled community significant sums in man power to manage these encampments, along with associated clean-up costs, damage, target hardening and security. The encampments will also cause nuisance, harassment, alarm and distress. It is likely that this will continue unless prevented by injunction.

16. The size of the encampments can be significant. Rather than experience a small, temporary encampment which we would normally expect where a family is stopping up during their travels, we will experience in the region of 20 to 30+ caravans and associated vehicles will take control of entire,

or significant proportions of sites to support other activities, such as fly-tipping, burglaries and door to door calling. Some sites can remain in place for up to a month, rendering entire community assets unusable during that period. The encampments will only move when forced to do so by Police or Court order. The number of people involved can be 60+ with associated loose animals. The individuals are very reluctant to provide names.

17. The unlawful encampments have formed on both public and private sites including sports clubs, school grounds, parks, open land and businesses plots. Entry to many of these sites has been gained through forced entry, (the cutting of padlocks, ramming gates, ripping-up protective bollards and posts and driving vehicles over grassland) to access the site. This has the potential to put members of the public at risk, particularly when the encampment is on or near sports clubs, parks, children's play areas and schools. The travellers have used the sites for unlawful fly-tipping of commercial trade waste and their personal waste. This waste is then left behind for the Council, land-owners or tenants to dispose of at considerable cost. Unlawful encampments have a significant impact on Local Authority and Police resources. They invariably appear without warning. Local Authority and Police resources have to be redirected to deal with the travellers and commence removal proceedings in the Courts. This action generates considerable cost to Councils and local residents and detracts Local Authority officers and Police from their normal daily

duties. The encampments are known to be associated with particularly aggressive behaviour against occupiers of land to secure entry, with security and other staff being attacked with vehicles and pinned against walls or gates to allow other members of the camp to enter. Officers who attend to carry out welfare checks and monitor the camp are regularly met with aggression, both verbal and physical, and on occasion unwanted sexual commentary.

18. The cost associated with the unlawful encampment can be summarised as follows. Officer time is based on £35.00 p/h average across all officer involvement.

Year	2016	2017	Total
Officer Cost (Public Land)	£6000	£43,500	£48,500
Public Land Clean- Up	£11,250	£146,004.16	£157,254.16
Office Costs (Private Land)	£875	£4,900	£5,775
Private Land Clean- Up		£139,310	£139,310
GRAND TOTAL			£350,839.16

19. At most of the sites travellers have also left significant amounts of human excrement, litter and domestic waste. The public has access to these areas; this has the potential to cause serious health risks to members of the public and the environment. Other risks to human health and the environment have included the travellers dumping asbestos and other waste hazards on sites. This incurs considerable additional costs, on top of clearance charges, to ensure the waste is safely removed.
20. The unauthorised encampments have caused considerable stress, nuisance, disruption and serious financial loss to residential and business premises within the Borough. There are numerous complaints and allegations of intimidation, damage and threats. Many residents complain of fears and feelings of insecurity, which occur during the currency of these types of encampment, more so when they are occurring on land immediately adjacent to their own private properties. Some residents are confident enough to confront the travellers and are met with aggression and threats (see statement of Andrew Clark). The police have also received reports of some of the named defendants (Martin WARD) preying on an elderly dementia sufferer to empty his house of valuables (statement of Elise Gallately, EG/80 and EG/81) as well as generally targeting the vulnerable under the guise of looking for work (EG/76).

21. Maps are produced cataloguing sites where these unlawful encampments have taken place on Redbridge Council sites, Private sites, and Epping Forest Land, this is produced as [Exhibit RB/9] I also produce at [Exhibit RB/10] a map of sites proposed to be protected by the injunction, and at [Exhibit RB/11] a list of sites contained on that map.
22. LBR owns about one quarter of the Borough's land and so owns a considerable number of different types of properties. In selecting the list of properties for the injunction, it has only listed those that it feels would be more vulnerable to unlawful encampments, having regard to the nature of encampments to date. It has particularly included open spaces, schools (which are not in use for parts of the year), properties with large car parks and others with significant areas of open land. It has also selected a number of privately owned properties with similar characteristics.
23. As stated these encampments have been increasing along with the level of crime, intimidation, general nuisance, and industrial fly-tipping, requiring substantial waste removal costs associated with these encampments.
24. LBR use the powers available under the provisions of Section 77 and Section 78 of the Criminal Justice and Public Order Act 1994 ('CJPOA') to deal with unlawful encampments on its land. The response and method for dealing with unlawful encampments is set out in the Council's Unauthorised Encampment Protocol incorporating Adult/Children

Welfare and Housing Assistance visits/questionnaires. These are completed by officers attending the site during initial welfare visits.

25. However, what we find is that the encampments will simply move from one site to another within the borough, and therefore the powers available to the Council under s77 and s78 are not capable of addressing the scale of the problem faced. The issue is plainly, on the evidence available not an issue of need for residential accommodation and seems to be driven by commercial motives, with travellers breaking into premises and fly-tipping on a commercial scale, leaving the business or council with thousands of pounds in waste disposal and eviction costs. It is not unusual for 50 and 80 tonnes of waste to be tipped on these sites. The witness statement of Dave Lucas confirms these figures and demonstrates that over the course of the 6 tips he is able to discern (of which full details of only 5 are available) there has been 309.38 tonnes of waste cleared at a cost of £120,413.96. The waste amounted to 56 large lorry loads of waste. This is by no means consistent with waste resultant from encampments in genuine need of residential accommodation and is waste associated with encampments using the land as a base for their commercial and unlawful activities.

26. In April 2017, the Redbridge Enforcement Team took over responsibility for the LBR's Unauthorised Encampment Protocol. Prior to this the responsibility attending and managing unauthorised encampments in LBR

came under the remit of the Emergency Planning Team ('EPT'). During 2016, there were a number of incursions by travellers at various locations and sites on Council land and private sites throughout the Borough. These incursions were managed and actioned by the EPT. However, the officers who dealt with these incidents have now left Redbridge Council, access to documents are limited as they were not in general retained in a retrievable format and cannot now be obtained. However, I have been able to establish the sites and the dates of each unlawful incursion throughout this period in 2016-2018 and are listed in the table below:

Unauthorised encampments 2016

Date	Location	Address	Land Type
19 March 2016	Charter House Development Site, Ilford, IG1	Charter House Development Site, 450, High Road, Ilford, IG1 1UF	Private Site Ex RB/2 photos travellers moved on High Court Order
23 March 2016	Swan Development Site, Ilford, IG1	Swan Development Site, Mill Road/Prior Road, Ilford, IG1	Private Site Ex RB/3 photos Travellers moved on High Court Order
24 March 2016	Former Newbridge School (Loxford Lane Campus) Development Site, Ilford, IG3	Former Newbridge School (Loxford Lane Campus) Development Site, 197 Loxford Lane, Ilford, IG3 9AE	Council Land Ex RB/4 photos Travellers left on 8 th April 16
22 June 2016	George Green, Wanstead, E11	George Green, Wanstead, E11 2NT	Corporation of London Land Travellers moved off the

			same day by Corporation of London Officers
22 July 2016	The Willows, Ilford, IG6	The Willows, Forest Road, Ilford, IG6 3SL	Private Site Ex RB/5 Incident log, Travellers moved on by police
20 September 2016	Roding Valley Park, Southend Road, Woodford, IG8	Roding Valley Park - opposite Tesco Woodford – adjacent to A1400	Council Land Ex RB/6 photos, welfare forms, decision form, eviction letter Travellers left same day
22 September 2016	Ilford Recorder Development Site, Ilford, IG1	Ilford Recorder Development Site, 539 High Road, Ilford, IG1 1UD	Private Site Travellers left site, reason unknown
5 November 2016	Britannia Music Development Site, Ilford, IG1	Britannia Music Development Site, 60 to 70 Roden Street, Ilford, IG1 2XX	Private Site Ex RB/7 photos, Travellers moved on reason unknown
11 November 2016	Kearley and Tonge Sports Ground, Ilford, IG1	Kearley and Tonge Sports Ground, Rear of Royston Gardens, Ilford, IG1 3SY	Council Land Vacated land on 13 th Nov 16, reason unknown
14 November 2016	Little Heath, Goodmayes, RM6	Little Heath, Barley Lane, RM6 4YG	Council Land Ex RB/8 , initial visit and second visit form Travellers moved on reason unknown

Unauthorized Encampments during 2017 and 2018

21 April 2017	Kearley and Tonge Sports Ground, Ilford, IG1	Kearley and Tonge Sports Ground, Rear of	Council
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		Royston Gardens, Ilford, IG1 3SY	
27 April 2017	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private
27 April 2017	Woodford Town Football Club Development Site, Woodford, IG8	Woodford Town Football Club Development Site, 267 Snakes Lane East, Woodford Green, IG8 7JJ	Council
5 May 2017	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private
21 June 2017	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private
20 July 2017	Kearley and Tonge Sports Ground, Ilford, IG1	Kearley and Tonge Sports Ground, Rear of Royston Gardens, Ilford, IG1 3SY	Council
28 July 2017	Bancroft Rugby Football Club, Buckhurst Hill, IG9	Bancroft Rugby Football Club, Buckhurst Way, Buckhurst Hill, IG9 6JD	Private
1 August 2017	Ray Park, Woodford, IG8	Ray Park, Snakes Lane East, Woodford Green, IG8 0BZ	Council
5 August 2017	Ashton Playing Fields, Woodford, IG8	Ashton Playing Fields, 598 Chigwell Aldborough Road South, Seven Kings, Ilford, IG3 8HG Road, Woodford Green, IG8 8AA	Council
22 August 2017	Ford Sports & Social Club, Ilford, IG3	Ford Sports & Social Club (Essex),	Private

		Aldbrough Road South, Seven Kings, Ilford, IG3 8HG	
24 August 2017	The Valentine Development Site, Ilford, IG2	The Valentine Development Site, 27-37 Perth Road, Ilford, IG2 6BX	Private
24 August 2017	The Doctor Johnson Development Site, Ilford, IG5	The Doctor Johnson Development Site, 175 Longwood Gardens, Ilford, IG5	Private
29 August 2017	Ford Sports & Social Club, Ilford, IG3	Ford Sports & Social Club (Essex), Aldborough Road South, Seven Kings, Ilford, IG3 8HG	Private
4 September 2017	Wanstead Rugby Football Club, Woodford, IG8	Wanstead Rugby Football Club, Roding Lane North, Woodford Green, IG8 8JY	Council
8 September 2017	Clayhall Park, Ilford, IG5	Clayhall Park, Longwood Gardens, Clayhall, IG5 0EB	Council
14 September 2017	Tesco, Barkingside, IG6	Tesco, 796 Cranbrook Road, Barkingside, IG6 1HY	Private
14 September 2017	Shannon Centre Development Site, Ilford, IG3	Shannon Centre Development Site, 14 Cameron Road, Seven Kings, Ilford, IG3 8LA	Private
15 September 2017	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private

15 September 2017	Open Space at Hurstleigh Gardens, Ilford, IG5	Open Space at Hurstleigh Gardens, Clayhall, IG5	Council
16 September 2017	Essex & Suffolk Water Site, Ilford, IG4	Essex & Suffolk Water Site, Roding Well Treatment Works, Roding Lane South, Ilford, IG4	Private
19 September 2017	Sainsbury's, Ilford, IG2	Sainsbury's, King George Avenue, Ilford, IG2 7SH	Private
20 September 2017	Former PLA Development Site, Ilford, IG1	Former PLA Development Site, The Drive, Ilford	Private
21 September 2017	Redbridge Recreation Ground, Ilford, IG4	Redbridge Recreation Ground, Keswick Gardens, Redbridge, IG4 5NF	Council
28 September 2017	Roding Valley Park, Woodford, IG8	Roding Valley Park, Chigwell Road, Woodford Bridge, IG8 8AY	Council
17 October 2017	Tesco, Barkingside, IG6	Tesco, 796 Cranbrook Road, Barkingside, IG6 1HY	Private
18 October 2017	Kearley and Tonge Sports Ground, Ilford, IG1	Kearley and Tonge Sports Ground, Rear of Royston Gardens, Ilford, IG1 3SY	Council
18 October 2017	Woodford Trading Estate, Woodford, IG8	Woodford Trading Estate, Southend Road, Woodford Green, IG8 8HF	Private
19 October 2017	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private

19 October 2017	Iford Recorder Development Site, Iford, IG1	Iford Recorder Development Site, 539 High Road, Iford, IG1 1UD	Private
19 October 2017	Beal High School, Iford, IG4	Beal High School, Woodford Bridge Road, IG4 5LP	Council
20 October 2017	Wanstead High Street Development Site, Wanstead, E11	Wanstead High Street Development Site, Wanstead, E11	Private
23 October 2017	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private
25 October 2017	Synagogue Development Site, Iford, IG3	Synagogue Development Site, 23 Wessex Close, Newbury Park, IG3	Private
8 December 2017	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private
21 December 2017	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private
22 December 2017	Woodford Trading Estate, Woodford, IG8	Woodford Trading Estate, Southend Road, Woodford Green, IG8 8HF	Private
31 December 2017	Land at Collier Row Road, Romford, RM5	Land at Collier Row Road, Romford, RM5	Private
8 January 2018	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private
25 January 2018	Tesco, Woodford, IG8	Tesco, Southend Road, Woodford, IG8 8GE	Private
28 January	Land and buildings on the West Side of Roding Lane South, Woodford Green	Land and buildings on the West Side of Roding Lane	Private

		South, Woodford Green	
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27. The encampments experienced by LBR and Private sites will typically be accompanied with the following aggravating factors:

Cash paid to vacate land

28. There are a number of instances whereby the perpetrators of the encampments have sought to extort money from landowners in order to vacate the land. For example, please see:

- a. Statement of Sarbjit Sanger, Director of Dalco Developers. *'I saw that there were about 6 caravans and 10 or so vehicles on our site, also a lot of trade waste had already been dumped on our site. One of them told me they would go if I paid them £3,000.00. I asked "are you going to clear all the rubbish away as well if I pay you to leave amicably" however they would not agree to do that. I understand that the partner attended the site that £1,600.00 cash was paid to the travellers to get them to leave the site, which they did. Four skip loads of rubbish were left behind by them which have cost £3,000.00 to dispose of.'* [Sarbjit Sanger, Paragraph 4] and in relation to a second incursion that *"I understand that the partner attended the site that £1,600.00 cash was paid to the*

travellers to get them to leave the site, which they did. Four skip loads of rubbish were left behind by them which have cost £3,000.00 to dispose of. The site has now been secured pending development.” [Sarbjit Sanger, paragraph 7]

- b. Statement of Harveil Toor, Enforcement Manager.’ *On 14th September 2017, I was informed that overnight travellers had broken into the site of the Shannon Centre (Berties Night Club) 14, Cameron Road, Seven Kings, Ilford IG3 8LA. I contacted Mr Johal, Site Manager he advised me that due to an expensive drill which was on the site they were prepared to pay the travellers £2,000.00 to leave. Apparently this course of action was taken [Harveil Toor, Paragraph 4]*
- c. Statement of Michael McNally who is the Club manager for Ford Sports and Social Club, who write in respect of an incursion in August 2017 and says “*Mr Scott Hines stated that the travellers would not leave the property voluntarily and would stay until a Court Order was granted and served. Mr Hines also informed me of an offer put forward by the travellers for me to consider. That if £500 per caravan was paid in cash by the club they would vacate the site in an hour” [Michael McNally Paragraph 4].*

Interruption to businesses, cancelled events/parties/functions.

29. A common feature of incursions on active businesses and social clubs is that the normal day-to-day running will become interrupted. This is confirmed in:

a. The statement of Michael Calvert, who is the president of Wanstead Rugby Football Club who says, in relation to incursions in September 2017, that *“we had a number of people and organisations who had hired our Clubhouse for various events and activities over this period, all were notified of the problems and at least one provided their own security within the Clubhouse as a precaution.”* [Michael Calvert, Paragraph 10]

b. The Statement of Robert Youd, who is the chairman of the Bancroft Rugby Football Club, who says in respect of an incursion in July 2017 that *“We had a booking for a 30th Birthday party at our Clubhouse on the Saturday evening which we also had to cancel due to safety and security concerns. I had to inform the hirer that we needed to cancel the booking. The hirer pointed out that he had been planning the event for months and had already spent over £2000 for the party which was not recoverable”* [Robert Youd, Paragraph 5]. This incursion is also detailed by Stephen Thirsk and Tracy Scott in their witness statements.

- c. The Statement of Stephanie Hahn in relation to a 1 month long incursion in August 2017 in which social events had to be cancelled at the Ashton Playing Fields. Stephanie Hahn confirms that *“I had to call in a duty manager to assist with a party we had on in the hall at the time. However, it was later decided that this party be cancelled and everyone moved off the site for their own safety”* [Stephanie HAHN Paragraph 5] and *“we had a summer activity camp arranged throughout the school holidays but due to the travellers being on site parents did not book their children in to attend. The activities were to be held on the astro turf which is near where the travellers were situation; they did not feel their children would be safe on the site. A lot of our regular customers stopped coming down to use the tracking during this period due to the disruptive behaviour of the travellers and fears for their safety. This had a detrimental effect on our reputation, which even now we are trying our best to re-build”* [Stephanie Hahn paragraph 15].
- d. The statement of Michael McNally who is the Club manager for Ford Sports and Social Club, who write in respect of an incursion in August 2017 and says *“The club house was closed while the travellers were on site, we were forced to cancel all our events. This was necessary for our members and visitors safety”*.

[Michael MCNALLY paragraph 6] and “the Club had a full calendar of events for the weekend of the first incursion, a wedding for 180 guest, two football games, three cricket games and a bowls match. The area that the travellers were occupying is used to accommodate all the extra cars and is close to a cricket pitch. The Sunday was booked for a charity football game/family event, scheduled for 150 guests using the hall and grounds. A bouncy castle and ice-cream van were all booked with all proceedings going to the National Brain Appeal. This event and all others would have been impossible to safely control and were cancelled.” [Michael McNally Paragraph 8] and then, in relation to a second incursion, that “there were a number of events booked for that week and the bank holiday weekend. These included a wedding with 180 guests, the Muslim Eid celebration with 180 guests, a 1st birthday celebration along with eight football matches and five cricket matches [Michael MCNALLY Paragraph 9] and at paragraph 11 that “we were forced to close the club house and cancel all of our events for the safety of our members and visitors”.

- e. The statement of Kevin Wackett confirms *“The James Leal Centre was closed for 7 days, preventing access to the public toilets for the park users; the café was also closed preventing the operator*

from trading, therefore losing revenue on this local business, frequented and supported by the local community.” [Kevin Wackett Paragraph 7]

- f. The statement of Elise Gallately, who is a Police Inspector and refers to a number of crime reports relating to making-off without payment, at the following exhibits – EG/89, EG/88, EG/86, EG/57, EG/27, EG18.

30. Impact/damage/disruption on Industrial Estates

- a. The Statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the Woodford Trading Estate in October 2017. *“On the afternoon of 24th October 2017, I attended the location in order to ascertain how much damage had been done to the land. Upon inspection, I found an extensive amount of fly-tipping, consisting of mainly wood and building materials. It appeared that the fence to the rear of the property had given way due to the weight and volume of the waste dumped on the site. I exhibit at [Exhibit TS28] photographs of the waste found” [Tracy Scott, Paragraph 57]*

- b. The Statement of Sarbjit Sanger: *“On behalf of my Management /Development Company and Partners we have become increasingly concerned that unlawful incursions by travellers upon our land and properties within Redbridge Borough are having a detrimental effect on our business ventures. We are worried that if such incursions persist we may reevaluate our business plans within Redbridge. The cost of fly-tip removal, damage, threats and intimidation will become unsustainable if these problems with travellers continue.” Sarbjit Sanger Paragraph 9*
- c. Statement of Lindsey Jacobs Operations Manager Direct Wholesale, who provides an overview of the impact and issues experienced at the Woodford Trading Estate.

Human excrement / danger to public health.

31. Ioannis Ifantidis in his witness statement confirms that *“human excreta, the collective name for human faeces and urine contains many disease causing pathogens (viruses, bacteria, cysts protozoa and eggs of parasitic worms). One negative impact of human waste is the risk of surface water contamination, which is caused by liquid and solid waste products that find their way into water bodies. Once out of the body stools are subjected to environmental bacteria that may use the excrement as food and thrive. When dry stools become lighter and more susceptible to becoming*

airborne, thus having the potential to travel greater distances and affect more people. Disease causing organisms that live in the human gut are easily spread from person to person when they are excreted in faeces. Diseases that are recognised as being spread in this way include viral and bacterial gastroenteritis, hepatitis, cholera, dysentery and intestinal worm infections. Contact with faeces can cause skin infections particularly when there are minor cuts or abrasions, such infections could in worst cases lead to septicaemia and death.” The following witness statements have highlight that human excrement has been left at the following sites.

- a. The statement of Michael McNally who is the Club manager for Ford Sports and Social Club, *“I produce photographs, now shown to me as ‘Exhibits MM/2-7’ showing the unlawful occupation and the fly-tip and human waste dumped on our site by the occupiers during the incursions”.* **[Michael MCNALLY Paragraph 2]**
- b. The statement of Michael Calvert, who is the president of Wanstead Rugby Football Club. *“Although the travellers had departed on the 15th September 2017, they left rubbish and waste behind, much of which constituted a biological hazard. This waste included baby’s dirty nappies, soiled toilet paper and wipes. Club members instigated the voluntary process of clearing away*

rubbish that had been thrown on our pitches and into the hedgerows, stacking building waste into larger piles and household waste into black bags. During this process we found and cleared multiple dirty nappies and soiled clothing together with rotting food waste” [Michael Calvert, Paragraph 10].

- c. The statement of Andrew Clark, local resident, in relation to the unauthorised encampment at Roding Valley Park in September 2017. *“There was also a significant quantity of human excrement dumped on the grass which stunk for weeks” [Andrew Clark, Paragraph 2].*

- d. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on Kearley and Tonge Sports Ground in July 2017. *“Ms Kaye and I then proceeded to the rear of the site, in order to ensure that no waste had been fly- tipped into the River Roding. Upon inspection of the river and riverbank Ms Kaye and I found human excrement and used baby wipes. It is my belief that the travellers were using this area as a makeshift toilet” [Tracy Scott, Paragraph 14].*

- e. The statement of Ioannis Ifantidis: *“During my visit to Valentines Public House, Perth Road, Ilford IG2 6BX on the 20th September*

2017 at 14:00 hours I witnessed a large number of black bags filled with household waste, building waste, untreated human faeces and used nappies. There were a large number, in the region of 50 to 60 black bags left behind by those forming the unauthorised encampments which are the subject of this claim for an injunction.

- f. The statement of Stephanie Hahn, Manager, Ashton Playing Fields: *“Throughout their stay the traveller children run riot, removing safety ropes and poles from the hammer throw area on the track and hiding them or throwing them. Dirty nappies were left on the track, as well as various household rubbish, they also allowed their dogs to run around the centre*
- g. The statement of Simon James: *“I produce photographs taken at time of my visit of the fly-tips as [Exhibit SRJ/12]. Along with the fly-tip there was numerous locations with human faeces in the grass” [Paragraph 12].*
- h. The statement of Tracy Scott: *“Whilst conducting the site inspection, I found evidence to suggest that the travellers had been using, the wooded area as a makeshift toilet; I found human excrement and tissue paper in a couple of different locations” [Tracy Scott, Paragraph 47].”*

Damage to Land

32. The following evidence has been provided by various witness concerning the damage to land including:

- a. The statement of Michael McNally who is the Club manager for Ford Sports and Social Club, *"I later witnessed at least four different cars drive over various areas of the ground. I saw two silver cars doing handbrake turns on the field in front of my office". [Michael McNally, Paragraph 6]*

- b. The statement of Michael Calvert, who is the president of Wanstead Rugby Football Club. *"The younger members of the traveller community were in the habit of using the 1st team and junior pitches as a race track for vehicles and would continue with this activity until late at night with headlights blazing" [Michael Calvert, Paragraph 5].*

Commercial / Industrial fly-tipping Of Trade Waste And Hazardous Materials And Cost Of Clean-Up, And Risk To Public Health.

33. One of the most common issues associated with unauthorised traveller encampments is that of discarded rubbish and commercial/trade waste. The majority of the encampments within the Borough result in prolific fly-tips being deposited on the sites. The travellers that frequent the sites

appear to be connected to the building and waste removal trades and tend to deposit their commercial/industrial wastes on the site they occupy. The waste consists of earth, bricks, rubble, mortar, plaster, plaster board, asbestos, roof felt, tiles, wood, kitchen bathroom units, flooring and roofing components, skirting boards, pallets, sinks, toilets, carpets, sofas, beds, furniture, trees, shrubs and other trade and personal waste.

34. Many of the fly-tips are significant in size and clearly arise from commercial operations being run by the travellers. The travellers tend to use flat back or panel vans to transport the waste. The maximum payload of a transit van is 2 tonnes. The landfill tax cost to dispose of 1 tonne legally is approx. £90. Factor in the cost of a driver and vehicle for the disposal and the landfill charges; it is understandable why waste producers would be willing to pay the asking price from persons willing to dispose of their waste cheaper. When the local authority business owner of the land finally removes the travellers they are left with the cost of disposing of the waste that has been dumped on their land. This is considered in the following witness statements:

- a. The statement of Giuseppina Payne who lives adjacent to the entrance of the Ford Sports and Social Club, "*These groups of caravans created what I would describe as a mountain of rubbish by dumping household and building waste*". [Giuseppina Payne, Paragraph 1]

- b. The Statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the former Woodford Town Football Club site towards the end of April 2017. *“On the morning of 2nd May 2017, I received a telephone call from the security guard on site. The security guard stated that the travellers had vacated the land at approximately 1:30 that morning. At approximately 8:30, I attended the location in order to ascertain how much damage had been done to the land. This was the first time that I had been able to gain access to the site. During my inspection, I found a large amount of fly tipped waste, made up of building materials, domestic appliances, garden waste and other general items. I exhibit at [Exhibit TS6] photographs of the fly tipped waste” [Tracy Scott, Paragraph 11].*
- c. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment at Wanstead Rugby Football Club in September 2017. *“Whilst on site, Ms Kaye and I investigated a report received from a local resident that morning about further waste being dumped at the rear of Wanstead Rugby Football Club on Roding Valley Park Trail. At 14:15, Ms Kaye and I drove on to Roding Valley Park Trail. Approximately quarter of a mile down the trail Ms Kaye and I found a number of large fly tips. The fly tips consisted of mainly of*

wood, building materials, mattresses, household appliances and black bags of domestic waste. I exhibit at [Exhibit TS17] photographs of the fly tips found on Roding Valley Park Trail” [Tracy Scott, Paragraph 30].

- d. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the open space at Hurstleigh Gardens in September 2017. *“After ensuring that all of the travellers had left Redbridge, Mr James and I returned to the open space at Hurstleigh Gardens in order to ascertain exactly how much damage had been done to the land. Upon our return, Mr James and I entered the wooded area and found a number of large fly tips containing items such as building waste, domestic appliances, domestic waste, cardboard, wood, mattresses, sand and broken glass. I exhibit at [Exhibit TS23] photographs of the fly tipped waste. I was shocked at the level of fly tipping on the site, especially given the fact that the travellers had only entered the land on 15th September 2017. Whilst conducting the site inspection, I found evidence to suggest that the travellers had been using the wooded area as a makeshift toilet; I found human excrement and tissue paper in a couple of different locations” [Tracy Scott, Paragraph 47].*

- e. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the Kearley and Tonge Sports Ground in October 2017. *“Mr Jones and I drove on to the site and headed to the rear of the Sports Ground. I was shocked by the level of fly tipping we found, especially as the s had only been on site for a couple of hours. There were approximately eleven large fly tips consisting of building materials, wood, sand, metal, plastic sheeting, black bags of domestic waste, mattresses, cardboard, domestic appliances, garden waste and used carpet. I exhibit at [Exhibit TS27] photographs of the waste found” [Tracy Scott, Paragraph 55]*
- f. The statement of Simon James, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the open space at Hurstleigh Gardens in September 2017. *“On the 19th September at approximately 16.00 hrs. I attended the site to carry out a patrol and check the condition of the location. While patrolling the site I noted several large fly tips behind the long grass and within the wooded area next to the unauthorised encampment. I produce photographs taken at time of my visit of the fly tips as [Exhibit SRJ/12]. Along with the fly tip there was numerous locations with human faeces in the grass” [Simon James, Paragraph 12].*

- g. The statement of Sarah Kaye, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the Kearley and Tonge Sports Ground in July 2017. *“Following the eviction Tracy Scott and I inspected the playing courts where the travellers had set down their caravans and vehicles. I could see fly tipped waste consisting of white goods, cardboard, domestic waste. We then went further on that led down to the River Roding where I could see human excrement and used baby wipes all along the river bank caught in the foliage and photographed it [Exhibit SK5]” [Sarah Kaye, Paragraph 9].*

Problems Caused by the Travellers Children

34. The problems caused by some of the children associated with the encampments have been referred to in a number of the witness statements including:
- a. The Statement of Julie Bryant Head of Registration and Celebratory Services, LBR. *“On Thursday 14th September 2017, I saw that travellers had set-up an unlawful encampment on the land adjoining our building known as Queen Victoria House. Later that day when my colleague Helen Condon and as we were leaving work we witnessed two boys spraying paint on a car belonging to my colleague Ruksana Ali. The car was*

parked in the car park within the grounds of the Registrars Office. We followed the boys; they went through a gap in the fence to where there were a number of caravans on the traveller site.” [Julie Bryant, Paragraph 3]. Julie Bryant continues “7. On Friday the 15th September 2017, I arrived at work at 7.30am; I noticed that the travellers were still on the adjoining land. I advised Richard accordingly. The situation worsened throughout that day, with children from the traveller site trying to break into the Electoral Registration container in the car park and being a general nuisance. After one of them threw a stick at one of my officers I made the decision to close the door of our building to the public, and deal with our customers by asking them to ring the bell to enter.” [Julie Bryant, Paragraph 7].

- b. The statement of Michael Calvert, who is the president of Wanstead Rugby Football Club. *“During this time the younger elements within these travellers were routinely aggressive and threatening when they approached the gate to leave our ground. I have been advised that a number of local residents had also been threatened in the streets and around the local area” [Michael Calvert, Paragraph 6].*

- c. The statement of Stephanie Hahn, Manager, Ashton Playing Fields. *“Throughout their stay the traveller children run riot, removing safety ropes and poles from the hammer throw area on the track and hiding them or throwing them. Dirty nappies were left on the track, as well as various household rubbish, they also allowed their dogs to run around the centre. Their children were spitting and kicking windowed doors to the hall to try and get into our holiday club which is located there. They jumped a fence to the kindergarten playground and were climbing onto peoples cars. We had to speak with the adults on a regular basis to keep the children off the track and about their children’s unruly behaviour” [Stephanie Hahn, Paragraph 9].*

Costs Relating To Unauthorised Encampments Including Clearance, Security And Repair Costs

35. The costs associated with thee encampments have been significant as evidenced by the following:
- a. The statement of Michael Calvert, who is the president of Wanstead Rugby Football Club. *“During this period we lost the use of pitches and had employed 24 hour security. The tangible cost to the Club was £300 in respect of the marking of additional pitches and*

subsequent repair of the first team pitch. A cost of £4,650.00 was incurred in respect of the 24 hour security operation and purchase of new padlocks.”

[Michael Calvert, Paragraph 12]

b. The statement of Stephanie Hahn, Manager, Aston Playing Fields. *“The costs of the unlawful traveller incursion were substantial. Total security costs in August and September 2017 were £4658.60 and £4140.00 respectively (total cost £8,798.40) which I produce as exhibit SH/1. Height barrier cost (to prevent re occurrence) £4,370.00. Staff costs to clean up waste and mess dumped £507.52. Refund of cancelled party booking £977.00. The total monetary cost was £14,652.92” [Stephanie Hahn, Paragraph 16].*

c. The Statement of Dave Lucas, Area Manager, Cleansing. *“I have been asked to provide a statement in relation to my involvement in the clearance of debris and rubbish from various sites of unauthorised occupation by Travellers during the course of 2017. The sites I will deal with are: Woodford Football Club, Snakes Lane East, Woodford Green, IG8 7JJ; Wanstead*

Rugby Club, Roding Lane North, Woodford Green, IG8 8JY; Parkland at Hurstleigh Gardens, Ilford, IG5 0RQ; Redbridge Recreational Ground, Keswick Gardens, IG4 5ND; Roding Valley Parkland, Onslow Gardens E18 1NE & Elmcroft Avenue, E11 2DU; and Kearley and Tonge Playing Fields, Royston Gardens, Ilford, IG1 3SY. The London Borough of Redbridge is the principal Litter Authority for each of these sites” [Dave Lucas, Paragraph 1]. Dave Lucas continues, “I can say that the total amount of fly-tipped rubbish to be cleared from the six sites that I have described, between 30th May 2017 and 6th November 2017 was 309.38 tonnes, which equated to fifty-six large lorry loads, the total cost for which being £120,413.96, including VAT” [Dave Lucas, Paragraph 20].

- d. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on Kearley and Tonge Sports Ground in April 2017. *“I arranged for an officer from Coverdale k9 Security Service Limited to attend the site and remain in place for the duration of the incursion at a cost of £240” [Tracy Scott, Paragraph 5].*

- e. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the former Woodford Town Football Club site towards the end of April 2017. *“On the morning of 28th April 2017, I arranged for an officer from Coverdale k9 Security Service Limited to attend the site and remain in place for the duration of the incursion at a cost of £1492.50” [Tracy Scott, Paragraph 8].*

Criminal Damage and Theft

36. The following witness statements refer to incidents of criminal damage and theft.

- a. The statement of Michael McNally who is the Club manager for Ford Sports and Social Club, *“I later returned to my car to move it to allow the G4S security officers access. I saw that my passenger side door and window had eggs thrown at it, there was sputum all over my windows and someone had urinated over the front left of my car”.* [Michael McNally Paragraph 6]

Assaults/Intimidation/threats

35. A number of incursions have regrettably included assaults by members of the encampment on security officers, residents, businesses, Local Authority staff.

- a. The statement of Stephanie Hahn, Manager, Aston Playing Fields, who says *“I knew I needed to get hold of someone to report the matter and get some support on site to protect the facility from potentially being torn apart by their cars and caravans. The man from the first car and caravan, who had parked in front of the gate, got back into his car and started it up. My staff member was clear and out of the way, it was just me standing in the middle of the open gate. He started to drive his car at me, although this wasn't with a mass of speed, he drove up until his bumper made direct contact with the bottom half of my thighs, this later resulted in bruising. I honestly didn't anticipate this happening; I stayed in front of the lower car park gate, continuing to stop them accessing this area. I stood in front of the closed gate.... All of the men from the traveller convoy, about 16 of them were out; some of them jumped the fence and tried to push me out of the way from behind. They gripped my hair and I caught my foot under the gate, when I cried out 'ow' they stopped trying to move me.”* [Stephanie Hahn paragraph 4 and 5] and that *“On one occasion when I was on site, we had both front gates locked with the security guard on*

duty only letting in customers. A van pulled up with 3 travellers inside, the men demanded to be let in. The security officer said no. He was standing out by the gates after letting a customer in, they drove their vehicle at him pinning him up against the gates and repeating this action a couple of times.” [Stephanie Hahn, Paragraph 13]

- b. The witness statement of Elise Gallately refers to a number of assaults and intimidations in her statements, including a sexual assault involving grabbing of genitals and kissing at EG/47, and other allegations of assault and intimidation at EG/85, EG/67, EG/66, EG/60, EG/17,
- c. The witness Statement of Tristan Vetta, senior forest keeper, who confirms on 28 July 2017 that “*there were incidents of ASB including missile, including golf balls being thrown*” [Tristan Vetta Paragraph 5].
- d. The witness statement of Joanne Mansfield confirms that “*a neighbour of mine who I normally walk the dog with told me that the travellers said to him that if you do not put a lead on your dog we will shoot it through the head*” [Joanne Mansfield, Paragraph 5]

- e. The statement of Michael McNally who is the Club manager for Ford Sports and Social Club, *“the occupants were screaming obscenities and using offensive hand gestures towards me, which I found very intimidating”*. [Michael McNally Paragraph 6]
- f. The statement of Sarbjit Sanger, Director of Dalco Developers. *“The travellers would not allow me onto our site, some of them came out and spoke with me, and they were intimidating and threatening”*. [Sarbjit Sanger Paragraph 4]
- g. The statement of Robert Youd, who is the Chairman of the Bancroft Rugby Football Club. *“I went outside and saw a line of white vans, towing caravans queueing across our car park and making their way onto the training area, there were already 10 caravans on the training area. I went across to the lead vehicle and spoke to the driver, I told him that the grounds were private property and that they should leave, he refused. I called the police (999) on my mobile phone and moved my position so that I was standing in front of this traveller’s vehicle. Other traveller’s vehicles in the queue began to move up and around the vehicle I was blocking. Whilst speaking to the police control room (Essex Police) the vehicle I was blocking moved up until the bumper was touching my knees. I again told the driver and others who had gathered that the grounds were private land, that they had no*

right to be there and that they should leave. One of the males said, "you better move or you will get hurt", I took this as a direct threat to my safety. I stood my ground for a further minute or so. However, with a number of adults from the group surrounding me and the vehicle being edged forward with the engine being revved I moved. I thought it was likely that I would be seriously injured if I remained and confronted them further" [Robert Youd, Paragraph 1].

- h. The statement of Michael Calvert, who is the president of Wanstead Rugby Football Club. *"I have been made aware that on the 5th September 2017, the security guard on duty was asked by the travellers to unlock the height restrictor on the gate at the main entrance outside the Clubhouse. He initially declined but was threatened with extreme violence if he did not comply. As a result of this intimidation and fear the guard unlocked the gate, thereafter the travellers used this entrance to access our site and grounds" [Michael Calvert, Paragraph 4]. Michael Calvert adds, "When alone on site during the late evening and early morning the security guards on duty were routinely threatened and advised not to hinder the movements of the travellers in any way" [Michael Calvert, Paragraph 7].*
- i. The statement of Andrew Clark, local resident, in relation to the unauthorised encampment at Roding Valley Park in September

2017. *"I was with my two children in the park when I took photograph AC/1. I was approached by two male travellers. They asked me "What are you doing?" I explained that I was taking photographs. They then said "Why?" and "You can't take pictures of us!" They said "You don't have a right to do that" and "You take more pictures and you will see what happens to you!" I asked them "Is that a threat?" to which they replied "Yes". Following the threats that I had received from the Travellers I called the Police"* [Andrew Clark, Paragraph 2]

- j. The statement of Gary Rush, local resident, in relation to the unauthorised encampment at the former Woodford Town Football Club site towards the end of April 2017. *"When they arrived, myself and my partner tried to prevent them entering onto the football pitch grounds. However, they told us that they "Will be getting in" and had already cut the locks off the gate. I found that the Travellers were quite intimidating. Whilst the Travellers were settled on the ground there were about four or five transit pick-ups going backwards and forwards along the path and dumping building material"* [Gary Rush, Paragraph 2].
- k. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on Ashton

Playing Fields during August and September 2017. *“At approximately 11:25 hours Owen Jones and I began to serve the summonses on the caravans, cars and individuals present. Where possible I placed a copy of the summons on each vehicle. In order to evidence the service of the summonses, I attempted to take photographs. I was able to photograph some of the vehicles, but not all. When attempting to take a photograph of one individual’s car I was told to stop and that if I didn’t I would ‘fucking regret it’”*[Tracy Scott, Paragraph 25].

1. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on Wanstead Rugby Football Club in September 2017. *“Whilst on site, at approximately 11:30, Ms Kaye and I witnessed a white, medium sized, flatbed van full of what appeared to be building waste drive onto the rugby pitches. At this time both Ms Kaye and I were in the Redbridge Enforcement Team’s Land Rover. Ms Kaye drove up to the van and asked the driver, a young, white male in his early twenties, to produce his waste carriers licence; he laughed and refused. The gentleman then started to drive his van towards the access point for Roding Valley Park Trail. Having visited the previous day and already being aware of the extensive fly tipping on the Trail, Ms Kaye and I believed that the gentleman was*

planning to dump the waste on the back of his van on the Trail. Using the Land Rover, Ms Kaye went on to block the van's access to the Trail. The driver quickly became aggressive and abusive, driving towards us at speed whilst shouting obscenities and making rude hand gestures. Ms Kaye and I stood our ground, refusing to let the van pass. After a couple of minutes, the gentleman gave up and left Wanstead Rugby Football Club" [Tracy Scott, Paragraph 31 and 32].

- m. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the open space at Hurstleigh Gardens in September 2017. *"At one point I was surrounded by four young men in their late teens/early twenties and two younger boys. All were shouting and swearing, telling me I had no right to be there and that I had 'best get back in the car before something happens'. One of the older boys tried to grab my identification card and lanyard from around my neck. Although I stood my ground, I found this to be frightening experience"* [Tracy Scott, Paragraph 39].
- n. The statement of Sarah Kaye, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment on the open space at Hurstleigh Gardens in September 2017. *"As we*

approached the travellers they were very hostile towards us we were instructed to only speak to one male who was in his 50's with very short shaven greyish hair he was slim build about 5ft 8 and spoke with an Irish accent. He was uncooperative and did not want to engage with any of the services. The other males ranging in age from 12 years to 50 years from the group started to gather around and were intimidating the LBR staff. A few of the younger males started to make sexual advances towards me commenting on parts of my body. The group begun to get aggressive towards my college Tracy Scott and tried to grab her identification card from her neck. We managed to calm the situation down and established that they did not require any services. We then returned to our vehicles" [Sarah Kaye, Paragraph 15].

Community tension, complaints from local residents

36. The establishment of unlawful encampments especially on public land including parks and open spaces increases community tensions, with increases in complaints to the council and police from those within the community concerning intimidation by the travellers. Residents and members of the public complain about not being able to use public facilities/amenities being forced out of the area by the actions and

behaviour of the travellers. These complaints are illustrated by the following:

- a. The statement of Michael McNally who is the Club manager for Ford Sports and Social Club, *“During this period I had numerous calls from local residents asking what action we were taking to evict the travellers, many are elderly and were extremely worried and frightened” [Michael MCNALLY Paragraph 7] and then, in relation to a second incursion, that “I again had various calls from local residents and neighbours expressing concerns and fears for their safety. These incidents of unlawful traveller incursions caused my staff, myself, club members and the local community a great deal of fear, stress and concern”. [Michael MCNALLY Paragraph 11]*

Damage to land/property/gates/padlocks/highway.

37. When accessing or leaving sites these unauthorised encampments poses danger to other road users. Most sites that are subject to unlawful encampments are not designed to accommodate vehicular access by car, vans or caravans. These vehicle combinations are unsuitable to enter such sites, often requiring several attempts and quite a bit of manoeuvring by the driver. In many instances it involves the illegal crossing of the grassed verge/footway to gain access to/from the site. This behaviour has the potential to cause traffic congestion, inconvenience to other drivers and potential danger for road users and pedestrians as confirmed in.

- a. The Statement of Mark Baker who is the Facilities Manager for Jones Lang LaSalle. *“On Wednesday 18th October 2017, travellers took up unlawful occupation on site, with an encampment in the car park to the side of Unit 14. The car park to unit 14 is fenced off and secured by double gates and a padlock. I was advised by the CCTV monitoring station therefore was able to access the CCTV system and view images on my mobile device of their occupation at around 11pm that evening, by that time the travellers were on site and had already begun setting up their camp in the car park. I was told do not recall by whom that there were a total of 6 caravans, 4 trucks and assorted vehicles on site. Someone had clearly broken the padlock to the manual barrier and broken the bolts to the gate servicing the car park to allow the travellers to enter. These travellers stayed on this site from the 18th October 2017 until the 24th October 2017”*
[Mark Baker paragraph 2].
- b. The statement of Michael Calvert, who is the president of Wanstead Rugby Football Club who says, in relation to incursions in September 2017, that *“Around midnight on the night of the 3rd September 2017, our Club CCTV recorded a vehicle that had stopped at the top gate on Roding Lane North. It showed a man who has not been identified, cut away the locks on our gate; he then drove off in the vehicle. A short while later some eleven*

vehicles, including towed caravans, mobile homes, vans and cars entered our car park and made their way past the Clubhouse, beyond the hedge line to the rectangular playing area” [Michael Calvert, Paragraph 3].

- c. The statement of Tracy Scott, Senior Redbridge Enforcement Officer, in relation to the unauthorised encampment at the former Woodford Town Football Club site towards the end of April 2017. *“Officers from the Metropolitan Police Service (MPS), having also been called by local residents, were already in attendance and advised myself and Mr James that the travellers had gained entry by cutting through the chain and padlock on the front gate” [Tracy SCOTT, Paragraph 6].*

Interruption To Persons Using Facilities/Sports/Services

38. The witness statement of Stephen Thirsk who is the Club Secretary of Bancroft Rugby Football Club. *“We made a decision to cancel our junior rugby training that weekend, this was due to concerns and fears we had for the safety of our young people and staff.” [Stephen Thirsk Paragraph 3]*

Corporation of London Land

39. The witness statement of Tristan Vetta, senior keeper, states: *“The City of London Corporation owns and manages a large land holding, 830 acres of the City of London’s land holding at Epping Forest can be found within the London Borough of Redbridge. In contrast to other land owned by The City of London within Essex and The London Borough of Waltham Forest, much of the land within Redbridge is in the form of open grassland areas, which are managed in various forms from meadow and scrub land, amenity grasslands and football pitches. This type of land use makes it more appealing and vulnerable to unauthorised access by travellers and trespassers. All areas of Forest are protected under the 1878 Epping Forest Act, in addition to this protection areas of Wanstead Flats are also designated as an area of Site of Special Scientific Interest”.*

[Tristan Vetta Paragraph 1] Tristan Vetta continues *“On 22nd June 2016, the Epping Forest Offices were informed by telephone that travellers were attempting to occupy George Green in Wanstead, East London a site which is owned by the City of London but managed by The London Borough of Redbridge. This is a very vulnerable area due to its vicinity to the A12 road, as well as being an area of high amenity value, because of it is situated next to a large number of residential homes and businesses. Work by the Forest Keepers and officers at Redbridge meant that the incursion was unable to settle. However despite this initial action this still took up to 10 hours of staff time to deal with”.* **[Tristan Vetta Paragraph 4]**

Welfare checks

40. As part of LBR's Unauthorised Encampment Protocol welfare checks are conducted by officers from the Council's Housing, Adult Social Care and Children's Services Department. The purpose of the welfare visit is to gain information to assist with decision making process and to determine whether there are any humanitarian or welfare reasons as to why the travellers should not be evicted. During the welfare visit the Lead Officer will be accompanied by appropriately qualified representatives from Housing, Adult Social Services and Children's Services. These officers will undertake enquiries to discover whether there are issues under the Children Act 1989, the National Assistance Act 1948, and Education and Housing Acts etc. that the Council should consider prior to giving a section 77 CJPOA direction to leave the land. The following evidence demonstrates completion of welfare checklists and educational considerations:

- a. The witness statement of Emma Pattison, CPAT & Early Intervention Team Manager, writes "*The purpose of the visits are to check on the welfare of the children on these sites, identify any child protection concerns and offer any additional support to families that may be required. The visits involve a duty social*

worker meeting at the Redbridge Control Centre and visiting the identified site with colleagues from the enforcement team, housing service and adult social services. If immediate safeguarding issues are identified the police would be contacted to assist with joint safeguarding procedures and protocols. In all other cases families are spoken to about their children, living circumstances and environmental factors. Families are offered additional support and referrals to agencies such as the Redbridge early intervention service". [Emma Pattison Paragraph 1]

- b. The following exhibits are produced by LBR officers:
 - i. Carl Bradley exhibits welfare checklists at CB/2
 - ii. Simon James exhibits welfare checklists at SJ/2; SJ/8
 - iii. Sarah Kaye exhibits welfare checklists at SK/2
 - iv. Tracy Scott exhibits welfare checklists at TS/4; TS/11
 - v. I exhibit welfare checklists at RB/8

Education links

41. I have made enquiries of LBR Education Services who have confirmed to me that none of the names identified in the welfare checks are currently enrolled in schools within our borough.

Section 149 Equality Act 2010.

42. An equality impact assessment is required to assist the Council in demonstrating it has complied with its Section 149 Equality Act duty. It is used as the basis for making the decision to proceed with the injunction. An EQiA has been completed and approved by [Caroline Bruce] [Exhibit ATR/2]

Conclusion.

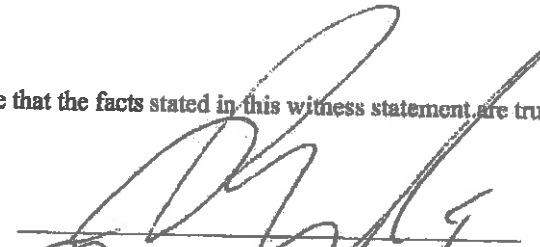
43. In the last 2.5 year(s) there has been an increase in the number of unlawful encampments, leading to increased pressure on Police and Local Authority officers to utilise their powers and resources. There has also been increased pressure on private entities to utilise their resources to secure removal of unauthorised encampments. Despite the use of these powers travellers move from location to location within the Borough, on a few occasions revisiting a site. Sometimes moving into a neighbouring area for a period, before returning and continuing to cause significant nuisance and intimidation to those living and working within the Borough. Some encampments can last for significant periods of time. It is apparent therefore that nothing short of an injunction in the terms sought in the draft order will prevent these unauthorised encampments with the associated harm are causing, as evidenced above. The serious negative impact that this is having on the settled population of Redbridge, makes it expedient to seek injunctive relief. The travellers conduct is in breach of

planning control and causes nuisance to the settled community. They flout the law causing harassment, alarm and distress to members of the community and businesses. The Council have weighed the travellers needs against this action in coming to this conclusion but feel it is proportionate, necessary and reasonable to seek an injunction. The Council appreciate that the unlawful actions and commercially motivated fly-tipping does not represent the actions of the vast majority of the gypsy and travelling community. It represents the actions of a small, determined minority who are having a significant impact on the quality of life of those in the locality.

44. No witnesses from the travelling community on these sites have assisted the Police or the Council in any prosecutions and names and addresses are not generally supplied. The Council is respectfully of the opinion that as evidenced from the above, and contained in all evidence filed in support of this claim, that it is expedient for the promotion and or protection of the interests of the inhabitants of The London Borough of Redbridge to seek an injunction. That there is clear evidence that harassment, alarm and distress is being caused to many of those working and living within the Borough and considerable costs are being incurred for evictions and clean-up of the waste left behind by the encampments.

I believe that the facts stated in this witness statement are true.

Signed:

A large, stylized handwritten signature in black ink, written over a horizontal line.

Name:

Bob

Date:

27/4/2018

Claimant
A Rulewski
First
Exhibits: ATR/1-2
Date: 25/4/18

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

BETWEEN

CLAIM NUMBER:

The London Borough of Redbridge

Claimant

and

**(1) MARTIN STOKES & 99 OTHER NAMED DEFENDANTS
(101) PERSONS UNKNOWN**

Defendants

WITNESS STATEMENT OF ADAM THOMAS RULEWSKI

I ADAM THOMAS RULEWSKI, a barrister employed by London Borough of Barking and Dagenham, Civic Centre, Dagenham, RM10 7BN **WILL SAY AS FOLLOWS:**

1. I make this statement on behalf the Claimant, the London Borough of Redbridge (“the Council”), in support of its application for an injunction and an interim injunction to prevent persons unknown from unlawfully encamping on named sites identified in the witness statement of Richard Bond. The contents of this witness statement are true to the best of my knowledge and belief, save where I indicate to the contrary, in which case I have set out the source of my knowledge.

2. There is now produced and shown to me marked exhibits **ATR1-ATR2**.

3. The Council has since January 2016 had an influx of unauthorised encampments; these have been mainly Irish Travellers though the ethnicity of some of the Travellers is not known. This has resulted in 56 unauthorised encampments to date. Clean-up costs between 2016 and 2018 have totalled £296,564.16 and

approximately £54,275 in officer time. In addition to this, a number of incursions require Police intervention and the exercise of their s.61 powers.

4. Many of the proceedings brought against the travellers are brought pursuant to section 77/78 of the Criminal Justice and Public Order Act 1994. Once the papers for possession are issued these are served on the Travellers at the unauthorised encampment, the papers include the summons and witness statements, the officer serving the papers has to serve the papers 24 hours before the hearing date. It has become apparent that in the majority of cases the Travellers wait to be served with the hearing date, then just prior to the court hearing they move on to another site. The order is only valid for 3 months (as is the case where the Police use their power under section 61 of the 1994 Act) and then afterwards the same site can be used again by the Travellers. They understand this and accordingly, sites are encamped repeatedly as follows.

5. These steps have not discouraged the Travellers from forming unauthorised encampments in the Borough and the Travellers have simply move to another site within the Borough. These sites are detailed in the attached map and spreadsheet which accompanies the claim form and particulars of claim.

6. The Corporate Director of Place, as a Chief Officer, has the delegated authority under the Constitution of the Council to take decisions relating to make decisions relating to Planning, Development Control, Community Safety, Waste, Environmental Health, Environmental protection and enforcement, parks and open spaces and is therefore the appropriate Chief Officer to make decisions in relation to unlawful encampments [LBR Constitution, Part 2, Section 6].

7. The Assistant Director – Assurance - has delegated authority under the Constitution of the Council to:

“institute, defend, or participate in any legal proceedings in any case where such action is necessary to give effect to decisions of the Council or in any case where he/she considers that such action is

necessary to protect the Authority's interests" [LBR Constitution, Part 1, Article 11.3]

8. The Corporate Director of Place in making the decision to proceed with an application for an interim and final injunction order has been briefed on the impact of the decision on the Travellers who have protected characteristics affording them protection from discrimination under the Equality Act 2010. This has included advice on the impact of the Human Rights legislation and applying the test of proportionality. Though there is no duty to prepare an Equality Impact Assessment one was prepared to assist the Corporate Director of Place to make the decision to instigate proceedings. In addition, the proceedings were authorised by the Assistant Director – Assurance - in consultation with the Corporate Director of Place. Please see **Exhibit ATR1**.

9. In making the decision the balancing of the rights of each group was of particular importance. In carrying out this assessment it was concluded that the actions of the Travellers were having a disproportionate affect on the settled community. The decision was taken therefore to proceed with an application for an injunction.

10. In making the decision the Council had regard to the fact that there is a core group of Travellers who repeatedly chose to form unauthorised encampments in the Borough and continue to occupy unauthorised sites. These are named within the map annexed to the Claim Form and Particulars of Claim and the Council seeks a Borough wide injunction against them. There are other Travellers who the Council cannot name, who historically set-up unauthorised encampments at various sites throughout the borough, also identified on the map. Accordingly, the Council seeks an order against person unknown against those Travellers who the Council cannot name, confined to the sites listed in the schedule attached to the draft order provided with the Council's application.

11. The Council has liaised with both the police over the action taken to date and this application for an interim injunction and injunction against the Travellers. It is

apparent that nothing less than an injunction will bring a stop to these persistent unauthorised encampments in the Borough. The Council believes that interim injunction will be required pending consideration of a final order, which the Council accepts, with the number of Defendants involved, might not be fully considered for some time. When considering the interim injunction the Council has concluded that the only way to prevent further unauthorised encampments is to make this application.

12. I am familiar with the case of *American Cyanamid Co v Ethicon Ltd* [1975] A.C. 396 and the key principles derived from the case that the Court must apply when considering this application. I make the following points in relations to that case:

- (i) There is plainly a serious issue to be tried and the Claimants have a good arguable case, and damages would not be an adequate remedy, as is apparent from the supporting evidence presented with this application.
- (ii) Accordingly, the balance of convenience lies with granting the injunction as otherwise the unauthorised encampments, health issues, impact on the businesses and the settled community and environmental impacts from fly tipping, will continue. It has been demonstrated over the last year that alternative measures have not resolved the issue, which could take some time to resolve.

13. The Claimants respectfully submit that in accordance with the decision in *Kirklees Metropolitan Borough Council v Wickes Building Supplies Ltd* [1992] 3 W.L.R. 179 the Court ought not to require the Claimants to provide a cross-undertaking in damages where the Claimants is a public authority carrying out its administrative duties by seeking an injunction.

14. Accordingly, I respectfully request that the Court grants the injunction in the terms provided, or, alternatively on terms it thinks fit, on an interim basis pending final order.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed: Adam Rulewski

Dated: 25/4/18

Claimant
A Rulewski
First
Date: 25/4/18

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

and

**(1) MARTIN STOKES & 99 OTHER NAMED DEFENDANTS
(101) PERSONS UNKNOWN**

Defendants

SECOND WITNESS STATEMENT OF ADAM RULEWSKI

1. I, ADAM THOMAS RULEWSKI, EMPLOYED BARRISTER AT THE LONDON BOROUGH OF BARKING AND DAGENHAM, CIVIC CENTRE, DAGENHAM, RM10 7BN WILL SAY AS FOLLOWS:
2. I make this witness statement in support of the Claimants application for various service Orders prior to service of the above named proceedings. The Claimant seeks an interim and mandatory injunction pursuant to section 222 Local Government Act 1972, section 187B Town and Country Planning Act 1990 and/or section 1 Anti-social Behaviour, Crime and Policing Act 2014, in the terms set out in the draft Order. The Order is sought against the 100 herein named Defendants and Persons Unknown, and concerns to date 50 unauthorised encampments formed by the Defendants in the Borough of Redbridge between 2016 and 2017. The number of encampments has increased by 200% by the end of 2017. These encampments have included significant numbers of people at times, with 30 plus caravans and associated vehicles and animals including dogs and horses [see w/s of Richard Bond] and in

some case 60+ individuals. The unauthorised encampments have been formed in public spaces, schools, children's play areas, the business parks and industrial estates within the Borough, highways, sports clubs and car parks. The encampments have caused significant nuisance and community tension for the following reasons:

- (i) Because the settled community and local businesses believe that the Travellers are being allowed to flout the law;
- (ii) The encampments are causing serious nuisance and annoyance to the settled community, including forced entry at the Ashton Playing fields (see statement of Stephanie HAHN).
- (iii) The encampments leave behind untreated human excrement as the Travellers do not use the toilets within their own caravans. Human excrement has been found on sites where Defendants have formed encampments within the Borough [w/s Tracy SCOTT]. This has also been identified as a risk to human health in the witness statement of Ioannis IFANTIDIS who is qualified in Environmental Health, as detailed in their witness statement.

Due to the level of encampments and the time it might take to locate and serve this evidence on the Defendants I am seeking an Order on behalf of the Claimant that the injunction is listed before a Judge on a date after 22 March 2017 to ensure the Council has 3 clear days between service of the proceedings and the hearing date. I would also respectfully request that the hearing is allocated a 2 hour time estimate.

3. Male Gypsies and Travellers usually leave for work early in the morning and do not return until later in the evening. Accordingly, the Claimants also seek permission to serve the Defendants between 6.30am and 8pm during the week and between 7am and 4pm on a Saturday, with an Order that Claim forms and Applications served on a Saturday will be deemed served on the next working day and Claim Forms and Applications served after 4pm on a working day shall be deemed served on the next working day.
4. Travellers can be difficult to serve and there is no guarantee that they will open the door to their caravan, mobile home, or, brick and mortar property if they believe they will be served with court papers. In the event that the Claimants are unable to personally serve any of the 1st to 100th Defendants, the Claimants seek an order giving them permission pursuant to CPR Part 6.14, 6.15, 6.26 and 6.27 to serve any of these Defendants that cannot be personally served, by leaving a copy of the application notice, claim form, draft order and supporting evidence in a clear transparent envelope and affixing the same to a Caravan or Mobile home,

front door, or, other vehicle of which it is reasonably believed is occupied by the Defendant, or, Defendants that the Claimant has been unable to personally serve. I would also respectfully request that any Claim form and application notice served by this method will be deemed served the next business day after service of the application and Claim Form . The Claimant would also seek and order giving permission to serve by letter box service at any known address if the Claimant is unable to effect personal service at that address.

5. There are 8 lever arch files of supporting statements and evidence in this matter. Exhibits total over 2900 pages. There are 100 named Defendants that each require a copy of the evidence to be served on them. This would be an enormous amount of paper work and expense which no doubt would be difficult for the Travellers to store in their caravans as many of them are living in small touring caravans with the their families. Accordingly, the Claimants proposes that it shall be permitted to serve the evidence in support of the Claim and application for an interim injunction by USB memory stick and shall provide any Defendant that requests hard copies of the same within 2 workings days of receipt of such request and shall have a copy of all evidence relied upon in these proceedings available for inspection at the Council offices at Redbridge Town Hall between the hours of 10am and 4pm Monday to Friday excluding public holidays.
6. The Claimants also seek an Order that the Claims and Application shall be deemed served on Persons Unknown by serving a copy of the Claim Form, Application Notice and Draft Order on all sites identified in Schedule 2 of this Order by affixing them in a prominent place on the Land with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from Redbridge Town Hall and by contacting Legal Services on 0208 724 8379.

STATEMENT OF TRUTH

I believe that the contents of this statement are true.

Signed : Adam Rulewski

Dated : 25/4/18

Claimant
E Gallatly
First
Exhibits: EG1-89
Date:

IN THE HIGH COURT OF JUSTICE

Claim No:

QUEENS BENCH DIVISION

BETWEEN:

THE LONDON BOROUGH OF REDBRIDGE

Claimant

-and-

**(1) MARTIN STOKES AND 99 OTHER NAMED DEFENDANTS
NAMED IN SCHEDULE 1
(101) PERSONS UNKNOWN**

Defendants

WITNESS STATEMENT OF INSPECTOR ELISE GELLATLY

I Inspector Elise Gellatly currently employed as a Partnership and Prevention Inspector within the East Area Neighbourhood portfolio at Ilford Police Station WILL SAY AS FOLLOWS:

1. I have been employed by the Metropolitan Police for approximately 14 years. I make this statement in support of the Claimant's claim for an injunction against the above names Defendants and Persons Unknown. The facts in this witness statement come from my own knowledge or, where they are not from my own knowledge, they are true to the best of my knowledge and belief.

2. I was tasked to compile a list of incidents that Redbridge Police and now East Area Police have received regarding traveller encampments within the London Borough of Redbridge. This statement contains the reports recorded in relation to this issue which affected The London Borough of Redbridge between January 2016 and October 2017. This is by no means a total of all the incidents dealt with during this time within the Borough of Redbridge, however I have engaged in reasonable efforts to provide a true reflection of the state of affairs. Extracts of the reports have been summarised where appropriate within this statement to give an understanding of the nature of the report, some of which can be pages long. The reports are exhibited to my witness statement and are redacted where needed, to protect the identity of the informant, victim and some sensitive information that may relate to areas of risk to Police or addresses of vulnerable people in that area which are not connected with the traveller data. I attach as **Exhibit EG1-89** copies of the redacted reports.
3. These reports all relate to incidents involving members of the travelling community and the resources that it takes to deal with these calls. The types Of incidents we are called to concerning the travelling community vary wildly. These are general encampments, anti-social behaviour issues, being loud, aggressive and intimidating towards members of the wider community who wish to use areas like public parks. It also includes criminal damage due to locks and fences being broken to gain access to land and fly tipping.
4. All calls that are received at the emergency call centres via a phone call to 101 or 999 generate an individual reference number. This information is placed onto the computer aid despatched system referred to as 'CAD'. On the CAD is the type of call and other information that would be useful for the officers attending. The calls are then resulted on there. If other calls are received regarding the same location, generally they are linked to the original CAD and closed. Leaving the first CAD as the working one where all the

information will be placed. Officers will also use the police intelligence system CRIMINT to record intelligence that may be of use. The CRIS system is used to record crime matters.

5. General response policing has a very limited number of officers that are dedicated to answering both emergency and non-emergency calls. Depending on the type of incident denotes how many units may attend and the response time window. However if units are already dealing with other calls, this depletes our available resources. For large disorder incidents we have to request off borough specialist units such as the territorial support group (TSG). Often calls involving travellers requires a multi-officer or multi-unit response which means utilising numerous local assets as well as requesting central pan-London resources which has the effect of limiting our ability to respond to other calls for assistance. It also has significant financial impact on the service.
6. I have not been able to show the length of time spent dealing with these incidents. However on viewing the reports below they have required Police deployment or action on Eighty Nine (89) days over the above period, generating Twenty Five (25) crime reports and Sixty Five (65) intelligence reports. This does not include the length of time actually spent at each deployment or the officer numbers required or the other paper work that may be required following each deployment. I have not been able to generate an exact costing, however the average cost of one police officer per hour is £16.53.
7. I refer to the following reports starting with the most recent, with a short summary of those reports contained in **Exhibit EG1-89**. The information is a direct lift from the relevant police systems and redacted where necessary.

7.1 **Old Newbury Park Synagogue Site- 25-26/10/2017 CRIMINT
JIRT00386245, CRIMINT JIRT00386215, CAD- 2142/25OT17- 26/10/17**

Exhibit [EG/1 & EG2]. Member of public called stating that a group of travellers had set up camp in an old NEWBURY PARK SYNAGOGUE a building that is no longer in use. Reports to the police confirmed that the padlock to the site had been broken and that the travellers have replaced it with their own padlock and that the travellers had locked themselves inside the site. Local residents had also complained that they could see the travellers fly-tipping rubbish on the site. The following steps were taken:

- (i)** Units were assigned and made their way to the location where it appeared that caravans had entered the site and had changed its locks.
- (ii)** Officers spoke to a man who identified himself as Tom O'Brien (which they recorded may have been a fraudulent name). Mr O'Brien claimed that they had permission of the landowner to encamp on the site. The officers spoke with the landowner on the phone who confirmed that the travellers had not been given permission to enter the site and that he had requested they leave and they had refused to leave the site.
- (iii)** The police also spoke to another traveller on the site who identified himself as John, but refused to give any further details. The officers at the scene described this made as about 35 years old, large build with messy curly hair. The officers confirmed that there were eight caravans on site and about 20-30 people on site. John informed officers that there was a wedding on Saturday 28th October 2017 that they were attending, however they did not know any details of where its being held. John confirmed that they'd be leaving on Sunday 28th October or the latest on Monday 30th October 2017.
- (iv)** The CAD report confirms that on 25 October 2017, the supervising officer, Inspector Asghaar, decided that due to local community issues being caused by the encampment and a rise in criminal activity, the

officers would use their section 61 powers and direct the travellers to leave the land, giving them 24 hours notice to leave the land. The travellers left the land on 26 October 2017.

- (v) The CRIMINT Reports confirm that the travellers were Irish travellers, that they had broken into the site and that they had fly-tipped the site. The report also confirmed that the following vehicle registration numbers were confirmed as being present on the site and being used by the travellers: 03DL4797- Silver ford focus; 06DL2920- blue ford transit van; 11OY1837- White Ford Transit Van;12LK2799- Black FORD;YA06 ONJ- White ford transit Van; 06SO2698- White ford transit;VH23949- White Toyota Avensis;11KE6278- Caravan;10G19965- White ford Transit;04CE3433- grey Ford;05DL5753- Ford Transit; and 07D14955- Toyota Avensis. PNC checks have been undertaken to identify the registered keepers of the vehicles, and one check returned a name who has been identified as Kevin MAUGHAN (the 95th Defendant).

7.2 **Tesco's Southend Road, South Woodford- 23/10/2017 CRIMINT- JIRTOO386177 and CAD 2721/23OCT/2017 Exhibit EG3.** Officers attended TESCO's Car Park, Southend Road, South Woodford, to reports of travellers at the location. Officers were in attendance at 1240 Hours on 23/10/2017 and can verify that Duty Manager asked the travellers to leave by verbal instruction and instructed their own bailiffs to deal with the incident. The CAD report and CRIMINT confirms the following:

- (i) that the travellers informed landowners that if they gave them any grief concerning them encamping on the car park, they would call for 10 more caravans.
- (ii) Officers liaised with anonymous males on scene who states that their intentions were to stay there just for the day and that once the children

had been fed they would be moving on. It was decided not to issue a section 61 direction at this time as there was insufficient police resource to enforce the direction.

- (iii) On 24/10/2017 at 0940 HOURS a SECTION 61 ASB/PO Direction to leave the land was issued, directing the travellers to leave the land by 0700 and 25/10/2017, to which they agreed.
- (iv) Reports were received of further caravans arriving on the site and travellers children running up and down the car park and the supermarket with knives and hammers, which intimidated shoppers.
- (v) The travellers left the land on 25 October 2017.
- (vi) The travellers would not provide their details, however, the following vehicles were recorded as forming part of the encampment: VRM 07D14955; VRM 04CE3433; VRM EO54XJK; VRM BG57OYH; VRM 05DL5753; VRM FP12RUW; VRM FHZ4403; VRM YH55YUJ; VRM DN66RFX; VRM RJ60SVV; VRM NL07WHO; VRM SM66ULR; VRM LZR6700; VRM VUI9129; VRM EU05KVH; VRM R382JVW; VRM ND53OBJ and 11 white caravans with unknown registration numbers. PNC checks have been undertaken for these vehicles and the following registered keepers of these vehicles have been identified: Julia MAKULA (the 31st Defendant); Christopher McDONAGH (the 62nd Defendant); Lyas CAKR (the 62nd Defendant); Olsi KASA (the 67th Defendant); Ellen McDONAGH (the 64th Defendant); Michael McDONOUGH (the 81st Defendant); Sidney JONES (the 83rd Defendant).

7.3 Wanstead High Street- 23/10/2017 CRIMINT JIRT00386169 – Exhibit EG4 and EG6 and EG8. The travellers formed an encampment on a parcel of land/greenfield in Wanstead High Street, the report confirms that the site had been occupied by travellers since 20/10/2017. Officers

spoke with the landowner, Dalco Developments, the landowner confirmed that no permission has been given to the travellers to occupy the land and the owners have stated they would never give permission to anyone to occupy their land. The encampment consisted of 7-10 caravans and a s.61 notice was served on 23 October. A vast amount of fly tipping was noted on the site and the travellers left by 24 October.

- (i) On Friday 20th October 2017 at 20:45 officers were called to HIGH STREET, WANSTEAD in response to reports that a male was forcing entry onto an enclosed green area located just off of the HIGH STREET. This was followed by a number of other calls stating that travellers had entered the area and were driving vehicles and caravans onto the site.
- (ii) On police arrival they noted that the area in question is a small disused area of green with a perimeter fence all around the entire plot. This area is located next to WANSTEAD RECREATIONAL GROUND and opposite NATIONWIDE BANK, HIGH STREET WANSTEAD.
- (iii) On arrival at least five Irish males approached officers and refused to engage stating that the land was private and that they had permission to be on the land from the landlord who they named as 'STEVE'. They had secured the gates with a padlock and placed a sign on the gate threatening legal action should they be forcibly removed.
- (iv) At the time there was no evidence of any offences- there was no evidence of fly tipping or criminal damage and the only persons seen were those that approached officers. They seemed to be peaceful and were not making unnecessary noise.
- (v) Officers could not gain entry to the site as the perimeter was heavily overgrown and goes back quite a way from the road. At least four Ford Transit vans could be seen from the gate with at least four caravans,

however they had been parked in such a way that no index plates could be seen or they were removed altogether.

- (vi) Steps were taken to locate the owner of the lot but could not be found. Redbridge Council are aware and told officers that they would be conducting land registry searches to locate the owner. Epping Forest Constables and City of London were also informed due to the proximity of their land.
- (vii) On Monday 23rd of October 2017 at 14:30 hours officers attended the traveller encampment and issued a Section 61 of the Criminal Justice & Public Order Act 1994. The Land is currently occupied by about 6 caravans and 5 vans. VRM's seen - CP05KKS, 06DL2920, 10D19965
- (viii) There was 2 adult females on site who would not disclose their details. There was 1 male on site who would not engage with police but It was later found out his name was Billy, male, IC1, F511, short blonde hair, navy jacket. S61 was issued to the female, IC1, F507, black hair, large build, name possibly MARY. S61 was fully explained and the campsite was given until 0700 on 24.10/.17 to leave the land.
- (ix) Police have returned on 24.10.17 at 0830 hours to find the camp site still in operation and more vehicles on site. 2 males were spoken to and claimed no knowledge of the s61. Officers advised the males that due to the breach of the s61 the incident was being escalated to senior management and further action and possibly arrest was a likely outcome.
- (x) The males explained they had received permission from the landowner by the name of Dei, IC4 who gave permission. Officers noticed there was further evidence of rubbish dumping on the land and decided to return to the police station to continue enquires with the landowner.

Police returned at 1100 hours to meet the landowner and speak with the travellers.

- (xi) The travellers believed they had permission to be on the land in a pre-agreement with the landlord. Landlord stated he wanted the travellers off the land and they needed to be off by 1600. This was eventually agreed by all parties.

7.4 **Woodford Trading Estate- 21/10/2017 CRIMINT JIRT00386127/ JIRT00386036; CAD 4488/21OCT- 21-10-17– Exhibit EG5.** Police unit attended WOODFORD TRADING ESTATE SOUTHEND ROAD WOODFORD GREEN E18 in relation to CAD 4488/21 OCT where informant stated that travellers had broken into premises. The reports confirm the following:

- (i) An informant called and stated that the travellers were stealing electricity-big yellow cable coming from building and that dogs were running loose in the estate car park. When police attended there was no evidence of the travellers abstracting electricity.
- (ii) A shopping trolley had been filled with litter and used nappies and left it near the front of the site. There was also deposited around the site small piles of litter.
- (iii) One of the travellers identified himself as James Reilly. He said he was part of a small group of travellers who had encamped on the industrial estate since 18/10/17. He confirmed that they were in the area for a traveller wedding taking place on the weekend and they intend to leave the site on 23/10/2017 or 24/10/2017.

- (iv) An initial Unauthorised Encampment assessment was completed and the code of conduct form was served.
 - (v) There were 6 caravans on the site no other vehicles. There was evidence of recent littering/fly tipping on premises.
 - (vi) On 23/10/2017 officers attended and issued a Section 61 direction to leave at 14:15 hours, citing that the travellers had 6 or more vehicles on the land and that they have caused damage to the land by way of fly-tipping of timber to the rear of the site.
 - (vii) A report was made on 20 October 2017 by a caretaker of a local school that was close to the encampment, that the travellers had tried to enter the school the previous evening, but that the caretaker had ushered them out. Police confirmed that 3 caravans were located on a grass verge adjacent to the school. The school locked its gates and parked its mini buses behind the gates to prevent the travellers accessing the school grounds.
 - (viii) The PNC checks were carried out on vehicles attending at the scene and identified the following individuals: Martin MCDONAGH (the 36th Defendant); Patrick WARD (the 37th Defendant).
- 7.5 **Spire Hospital, Roding Lane- 20/10/2017 CRIMINT JIRT00386103/ JIRT00385352, CAD 5723/ 15OCT17- 15/10/2017 and CAD 7755 20OCT17- 20/10/2017– Exhibit EG9.** On Friday 20/10/2017 at 2010 hours officers from Clayhall Station were on routine cycle patrol near the Spire Hospital Roding Lane South when their attention was drawn to a vehicle that was parked in a car park on the hospital grounds. On looking into the vehicle VRM NA08XNY a large Flogas gas cylinder was laying across the back seat. The reports confirm the following:

- (i) The vehicle appeared to be locked but the driver's side back door window was missing and a cloth looks like to have been put up in its place;
- (ii) The officers could not look into the vehicle as it had been parked tightly against shrubbery and they could not get through it to look into the vehicle;
- (iii) The officers carried out a PCN check on the vehicle and has been notified as off road with no insurance and possibly on cloned plates, however, the officers could not check the VIN number, as this had been covered by parking tickets that were obscuring their view;
- (iv) On the 15 October 2017, an Informant had called police and stated that he believed his VRM plates NA08XNY had been cloned, as he had been getting various local authority tickets for offences such as jumping red lights and driving in bus lanes. He mentions that the suspect VRM plates seem to have a GB logo;
- (v) A report relating to a traveller site in Elmcroft Avenue reported one of the vehicles present at the site to be a Ford Focus VRM NA08XNY. It would appear that this vehicle possibly on cloned plates had been used by travellers as recently as 28th September 2017.

7.6 Royston Gardens- 17/10/2017 CRIMINT JIRT00385984, CAD 8624/17OCT17-17/10/2017, CAD 1887/18OCT17-18/10/2017 – Exhibit EG10 On Tuesday 17 October 2017, an informant contacted police and stated that gypsies were breaking in at the back of our street into the park, cutting the back gate. The informant explained that they backed onto a school and that caravans were entering the grounds. Officers attended the scene and confirmed:

- (i) That 12 travellers caravans had entered the sports ground at this location and had locked themselves inside the site;
- (ii) The travellers, through a person named James Morgon informed officers they intended to stay at the location for 2 days;
- (iii) On Wednesday, 18th October 2017 at 0030 hrs at Royston Gardens, officers noticed some vehicles parked-up at this location and the gate locked with a chain lock. The wire fence had been cut;
- (iv) By 18 October 2017 there was unauthorised encampment on the site including 25-30 vehicles;
- (v) Fly-tipping had occurred in the corner of the field;
- (vi) A section 61 notice was issued requiring the site to be vacated by 1800hrs on 18/10/2017
- (vii) The following vehicles were on site when police attended on 18 October 2017: VRM BG570YH White Ford Transit; VRM SM66ULR Silver Ford Ranger; VRM AV13OGB Silver Ford Focus; VRM 04-CE-3433 Silver Ford Transit; VRM 05-DL-5753 White Ford Transit; VRM FHZ4403 Silver Renault Van; VRM ON66RFE Silver Vaxhall Vivaro; VRM MV17OXH Grey Ford Transit; VRM NH03SOA White Ford Transit; VRM 11-OY-19837 White Peugeot Partner; VRM SJ16PWZ Red Citroen Van; VRM VNY58VYZ White Ford Van; VRM YK070UU Grey Ford Mondeo; VRM RJ60SVV Silver Vaxhall Vivaro and VRM ST11 FEX White Ford Transit. A PNC check was run for these vehicles and the following were confirmed to be the registered keeper of the

vehicles: Ellen MCDONAGH (the 64th Defendant); Michael MCDONOUGH (the 81st Defendant); Martin MCDONAGH (the 88th Defendant); Brian MCDONAGH (the 17th Defendant); Martin McDONAGH (the 36th Defendant); Patrick WARD (the 37th Defendant).

7.7 Southend Road, Woodford Green- 18/10/2017 Crime report 4421412/17- 18/10/2017- Refuse Disposal (Amenity) Act- Exhibit EG12 The police attended a site at the rear of Riverside House, Southend Road, Woodford Green, Essex, IG1 8HQ where a travellers encampment had been formed and had fly-tipped the site. The encampment included 5 caravans and 1 dog. A notice to the travellers to vacate by 8.p.m. that night had been issued and no court order was requested or squatters rights. The CRIS was completed via CHS and not CAD, and therefore I cannot search them to determine what type of notice was served.

7.8 Woodford Trading Estate- 18/10/2017 CRIMINT- JIRT00386036, CAD 8971/18OCT17- 18/10/2017- Exhibit EG14. Information was received from Security worker at Woodford Trading Estate that he has seen a number of caravans drive onto the grounds. Police attended the venue on the 18th October 2017 and observed that 5 Caravans and 3 personal vehicles had parked-up in the car park area of Unit 15 on the industrial estate. The reports confirm that:

- (i) 2 MALES were spoken to through the fence and informed that they were on Private property and that the Local Authority would be informed;
- (ii) The males who appeared to be of Irish decent stated that they had arrived that evening and that the gate to the car park was

already open. They had then secured the gate with their own steel combination cable lock;

- (iii) The following vehicles VRMS were noted in the carpark and PNC checks were undertaken: VRM MV170XH a Grey Ford Transit Panel Van Insured to Thomas Stokes 09/01/1968, Julia STOKES 09/01/1968 and Julia STOKES 29/08/1967; VRM NH03SOA a White Ford Transit insured to Martin MCDONAGH 16/08/1972; VRM AU130GB Ford Focus Insured to Martin MCDONAGH 16/08/1972. The other vehicles were parked in such a way that the VRMS could not be seen from outside the car park area.
- (iv) There are a number of additional linked CADs in this exhibit. This is likely due to proximity of the locations and reports that the travellers have been involved. For example, at EX171 there are reports of travellers attempting to gain entry to the Beal High School which is near to the Woodford Trading Estate. A knife was reported to have been found on the grass verge nearby the school; 3 caravans had been reported to have parked up in this area.
- (v) Reports were that the premises had been broken into and locks broken, the travellers had moved in and this was having an impact on the wholesale and retail businesses during the day and night. Additional security had to be enlisted. It appear private actions was taken to evict the travellers from the site by Screwfix.

7.9 **High road, Ilford – 19/10/2017 CRIMINT JIR00386069 – 19/10/17– Exhibit EG16.** Police attended this site where the Travellers were at 539 High Road, Ilford having arrived in the early hours of that morning. The following is reported:

- (i) The travellers were reported to have cut the lock to the site and cut the hoardings on the site;
- (ii) The travellers had fly-tipped rubbish on the site;
- (iii) The travellers claimed to be attending a wedding in the area;
- (iv) A section 61 direction was served on the travellers requiring them to leave;
- (v) The following vehicle registration plates were recorded, as being vehicles on the site belonging to the travellers: VRM's 06DL2920- blue Ford Transit Van; CP05KKS- Maroon For Transit Van; 05G2011- Caravan; AK12 BOY- Audi; ND530BJ- White Ford Transit; 06SO269A- Ford Transit; 05GT2011; 12LK2799; 11OY1837- White Peugeot Partner; and 11kE628- Caravan. PNC checks were conducted for these registration numbers but returned negative.

7.10 Prince regent Hotel, Woodford Green- Crime report 442029/17-06/10/17 Exhibit EG17. Prince regent Hotel, MANOR ROAD, WOODFORD GREEN, ESSEX, IG8 8AE. Apparently there was a function at the venue last night whereby a large group of travellers attended, it seems the function got out of hand, travellers became extremely rowdy and started fighting among themselves, bar staff were then threatened with travellers threatening to smash their faces in, police arrived at scene, travellers had left the venue and were out in the car park.

7.11 Elmcroft Avenue- 28/09/2017 – CRIMINT JIRT00385352, CAD 3070/28SEPT17 & 7063/28SEPT17- 28/09/17-Exhibit EG19. Police attended the site following a report from an informant that they had moved onto the site and threatened the informant when he had taken

a picture of their caravans and vehicles. A section 61 direction to leave the land was issued on 28 September 2017. The following vehicle on the site has their vehicle registrations recorded by the officers on the site: BF03CKZ car; RF54KNJ; Hx04XAP Camper; LT60 YND- car; U154KJN-Camper; EA11HDF- Car; BD14VCR- fiat; BG51EAX- transit; R695TWB-caravan; SP09MDV- caravan; NA08XNY- focus; LN52SVS; PK53OHE; JP09MDV; EJ55NKE; WLO4EBX; EO09JCU; W97VUB; LD59DKX; YJ09XXO; NA08XNY; Y843WGO; 8D09FNW; BX52WCA; DS03UXY; NL04BXE; S774JPT; SD14THF; DY10YHC; BD10MBA; CT06YND; BD09FNW; SH57ACO; and T11KDA. PNC checks were undertaken and confirmed the registered keepers of these sites to be Charlie WARD (the 3rd Defendant); Patricia WARD (the 4th Defendant); James KELLY (the 9th Defendant); Jo JOHNSON (the 12th Defendant); Michael WARD (the 17th Defendant); Kathleen GOLDTRAW (the 18th Defendant); Stacy OWNES (the 21st Defendant); Carol JONES (the 22nd Defendant); Gerrard MCDONAGH (the 24th Defendant); Henry NOBLE (the 25th Defendant); Michael GREASLY (the 26th Defendant); James WALSH (the 33rd Defendant); Patrick WARD (the 37th Defendant); Usman FARID (the 42nd Defendant); Barry ANGE (the 47th Defendant); Peter WHITE (the 69th Defendant); Dan SHAW (the 71st Defendant) Michael McDONAGH (the 81st Defendant); John WARD (the 97th Defendant); Martin WARD JNR (the 98th Defendant); Martin WARD SNR (the 99th Defendant). One vehicles was seized with registration CK57UTG, the owner and driver was a Mr Michael McDonough, the report confirms that this caused great upset to the travellers who became very angry and upset with the police. A further vehicle was also stopped the driver was identified as Patrick Ward 12/10/1996, the registered keeper was a Mary Ward and the Insurance was on the name of John Edwards.

- 7.12 **Woodford Bridge Road- 24/09/2017 – CRIMINT JIRT00385237-24/09/17-Exhibit EG20.** Police were called by local residents to attend

the recreation area on Woodford Bridge Road, Woodford, opposite the Jewish Community Centre. The call stated that there were caravans driving around the field. The following is notes in the report:

- (i) On officers attendance at the site, it was noticed that there were 18 caravans and 8 cars on the site;
- (ii) Officers engaged with one of the occupants of one of the caravans, who were reported as not wanting to engage with officers. They did, however, answer officers questions. They stated they had been at the location for two days and intended to stay until the council served them with an eviction notice;
- (iii) The following cars were recorded by officers to be present at the location: BD14UCR- Ford TORNEO; YJ09XXO- Black Vauxhall Corsa; BD10NBA- White ford transit (No insurance HELD); SH57ASO- White Ford combi van; CP09WEN- gray ford focus; LT60YND- White Ford Focus (no insurance held); PK53OHE- White ford transit; BF03XKZ- grey VW Passat.
- (vi) The following caravans were noted: SD03UXY- White Pageant Imperial; LD59DXK- White swift Accord (NO TRACE PNC); HV11VNF- White compass; OU06GVC- White autotril Avapahc (NO TRACE PNC); KP09 WRV- White Volkswagen; S774JTP- White Ducato Royale; Y843 WGO- White Bessager Cameo (No insurance HELD); DX15 BVW- White Bessacar; SP09MDV- White Tabbert Speciale; V159KJN- White royale (kells caravan). Various other caravans were seen with no identification marks to note on them.
- (vii) PNC checks confirmed that and the name of some of the registered keepers, who were confirmed to be: Charlie WARD

(the 3rd Defendant); Patricia WARD (the 4th Defendant); Michael WARD (the 16th Defendant); Kathleen GOLDTRAW (the 18th Defendant); Stacy OWENS (the 21st Defendant); Carol JONES (the 22nd Defendant); Henry NOBLE (the 25th Defendant); Michael GREASLY (the 26th Defendant); Jo MCCDONAGH (the 27th Defendant); James WALSH (the 33rd Defendant); Barry ANGE (the 47th Defendant); Nora WARD (the 57th Defendant); Scott SYTNER (the 78th Defendant); Muhammed USMAN (the 79th Defendant); John McDONASHAN (the 84th Defendant). If a check comes back as 'no trace' it could mean the vehicle is displaying a false VRM or written in error, or due to being an illegally made up plate where figures or letters appear different.

7.13 Redbridge Recreation Ground- 22/09/17 CRIMINT JIRT00385290- Exhibit-EG22-CRIMINT JIRT00385290- 22/09/17. On Friday 22nd September 2017 at about 1300hrs police attended Redbridge recreation Ground, Woodford Bridge Road in company with Redbridge enforcement officers. There were round 15 caravans parked on the grass at the venue. These caravans arrived on Thursday 21st September at around 0100hrs. The Council's enforcement officers were present on the site to issue a s.77 Criminal Justice and Public Order Act 1994 direction to leave the land. This gave them until 1300hrs on 23rd September to leave the site. Redbridge officers walked around the field and issued notices to all vehicles and caravans on the field. The following VRM's were issued notices; SD03UXY; OU06GVL; LD59DKX; Y843WGO; PK53OHE; BD10NBA; KP09WRV; S774JTP; BX52WCA; EY04UGK; T113KDA; BD09FNW; LC04SDX; EJ55NKE; DX15BVW; BF03XKZ and DX15BVY. PNC checks were undertaken for these vehicles and the following registered keepers were confirmed: Michael WARD (the 16th Defendant); Henry NOBLE (the 25th Defendant); Michael GREASLY (the 26th Defendant); Jo MCDONAGH (the 27th Defendant); James WALSH (the 33rd

Defendant); Martin MCDONAGH (the 36th Defendant); Patrick WARD (the 37th Defendant); Peter WHITE (the 69th Defendant); Joseph MCDONAGH (the 73rd Defendant); John MCDONASHAN (the 84th Defendant); John WARD (the 9th Defendant).

7.14 Hurstleigh Gardens – 21/09/2017 CRIMINT JIRT00385185 – Exhibit EG23. Police were requested to assist the Council's Enforcement Officers with a Travellers site at Hurstleigh Gardens on Wednesday, 20th September 2017. There were about 12 caravans and motorhomes that had been present at Hurstleigh Gardens for the past 5 days. The Travellers left the site at 17:15hours. Bailiffs and Redbridge Enforcement Officers were present. The Travellers were followed to Charlie Browns roundabout where they dispersed in several directions.

7.15 Woodford Bridge Road- 21/09/2017 – CRIMINT JIRT00385183 & CAD 7040/21Spet17-Location: Woodford Bridge Road, Redbridge Recreational Ground- Exhibit EG24. The reports confirm approximately there are 40 people on the site, initially the reports confirm that the Travellers were behaving and respecting the site, however, by 22 September the CAD report confirms, however, that local residents complained that the Travellers were playing music and cheering and dancing at 01.16am in the morning. The local resident complained that the loud music was preventing her children going to sleep. The following vehicles number plates were recorded by the police: A white ford transit- BD09FNW; A white ford transit- BD14UCR; A white ford transit- WL04EBX; A grey ford focus- EP08WEW; A white fiat motorhome- DX15BVY; A white fiat motorhome- DX15BVW; A VW Crafter Van- T113KDA; A Fiat Camper- S774JTP; and A Mercedes Van- LN52SVS. A PNC check was run on these number plates and it confirmed the following registered keepers: Michael WARD (the 16th Defendant); Jo McDONAGH (the 27th Defendant); Barry ANGE (the 47th Defendant); Scott SYTNER (the 78th Defendant); Mohammed USMAN (the 79th Defendant).

7.16 The Drive- 20/09/17 – CRIMINT JIRT0038512, CAD 1312/20SEPT17-20/09/17- Exhibit EG25. Location: The Drive, near to Cranbrook Primary School. There were approximately 20 people on site including some children 10 vehicles and 6 caravans at site at time of reporting, the following vehicles were present: A White ford transit- 161-D-19734; A white ford transit- 05-LD-2072; A white ford tansit-05 D- 79357; A white ford Transit- ND61HHP; A silver Ford Mondeo- 07-LS- 1273; A white Toyota Avensis- VHZ 3449; A Blue Ford Tipper- YA06ONJ; A black VW Jetta- 11-G-7695; A Blue Ford Focus- GF09FRJ; and A Ford Van- 04-DL-670. PNC checks were undertaken for each of these vehicles and confirmed the following registered keepers: Anne NEVIN (the 40th Defendant); John NEVIN (the 41st Defendant); Kevin MAUGHAN (the 95th Defendant); Tracy CONROY (the 10th Defendant); Winnie MAUGHAN (the 11th Defendant); Whilst at the location one of the occupiers mentioned that the site had room enough for 70 caravans and when questioned further he intimated that there were more caravans on route to the location.

7.17 King George Avenue, Ilford- 19/09/2017, CRIMINT JIRT00385115, CAD 2892/19SPET17 & 1313/19SEPT17- 19/09/17– Exhibit EG26. Travellers subject to a s.61 notice in Roding Lane South were evicted and then relocated to Sainsbury supermarket King George Avenue Ilford IG27SH at 1815hrs at the bottom end of the car park. The Report confirms the travellers were directed to leave by Sainsbury manager at 1845hrs and a code of conduct was served. The travellers stated that they were intending to leave within 2hrs.

7.18 Roding Lane South, South Woodford, 16/09/17 – CRIMINT JIRT00385047, CAD 932/16SPET17- 16/09/17-EG28. Officers attended the Water Works Roding Lane South, South Woodford, to reports of travellers having broken into the site and placed some caravans onto the property. Officers attended and spoke to a male at the camp who refused to give his details. The male stated they were down for a wake in the area and planned

to stay on the site until Sunday 16/09/17 at approx.1900 hours. There were five medium sized caravans on the site with approximately 3 adult males and three adult females on site along with approximately 4 younger children. All people on the site refused details.

7.19 Hurstleigh Gardens, CRIMINT JIRT00385044, CAD 6650/15SEPT2017-16/09/17– Exhibit EG29. Officers from Fullwell Ward and Fairlop Ward discovered a group of travellers who had set-up camp on Hurstleigh Gardens Open Space. The council issued a section 77 Criminal Justice and Public Order Act 1994 direction to all vehicles present. The following vehicle registration numbers were recorded at the site:T113KDA; SH57ASO; BD14UCR; KP09WX; S77JTP; BD10NBA; LN52SVS; Y843WGO; RO61EBP; LD5DKX; EJ55NKE; EA11HDF; V154KJN and SP09MDV. PNC checks were undertaken for each of these vehicles and confirmed the following registered keepers: Jo JOHNSON (the 12th Defendant); Michael WARD (the 16th Defendant); Kathleen GOLDDRAW (the 18th Defendant); Stacy OWENS (the 21st Defendant); Carol JONES (the 22nd Defendant); Jo MCDONAGH (the 27th Defendant); Patrick WARD (the 37th Defendant); Anne NEVIN (the 40th Defendant); John NEVIN (the 41st Defendant); Barry ANGE (the 47th Defendant); Peter WHITE (the 69th Defendant); Dan SHAW (the 71st Defendant); John MCDONASHAN (the 84th Defendant); Martin WARD Jnr (the 98th Defendant); Martin Ward Snr (the 99th Defendant). There were approximately: 10 caravans; 2 motorhomes; 2 loose dogs and approximately 60 people of all ages. With more vehicles constantly arriving. It was noticed from council officers that the same travellers have been seen from the rugby ground who were moved off the site earlier that morning.

7.20 An informant confirmed that the travellers on the site and the youths within the group are throwing stones at the bus every time it stops at the site. Informants complained that dogs were roaming around the site, which was a park area, the informant claimed that the dogs tried to bite their girlfriend's leg. Another informant is not wishing to, alleged that the young

children had a stick and said he would beat the informant if she did not get off the site. Further, an informant confirmed that lorries kept turning-up with lorry loads of rubbish. Reports were also received that the travellers were driving dangerously around a local school as the children were leaving. There are a number of linked CADS from sites nearby Hurstleigh Gardens. These CADS relate to roads leading to/from Hurstleigh Gardens. These are ASB issues and fly tipping which have been reported as being linked to the main incursions at Hurstleigh Gardens.

7.21 Cranbrook Road, Ilford- CRIMINT JIRT00385031, CAD 1515/15SEPT17 15/09/2017 – Exhibit EG31. An encampment formed at this location between a petrol garage and TESCO on open green space. The police recorded the following vehicles as present at the site: VRM ND61HHP Ford transit white; VRM ND61HHP- Ranger series 6 white; VRM FY17YEU- Ford transit white; VRM Fy17YEU- Charisma 550 white; VRM 04-DL-6767- Ford Transit white; VRM 04-DL-6767- ELDDIS 576 WHITE; VRM 07-LS-1273- Ford Mondeo White; VRM 07-LS-1273 Abbey GTS 418 White; VRM 11-G- 7695- Volkswagen jetta black; VRM 110G- 7695 Challender 570 white; VRM YA06ONJ- Ford Transit white; and RM YA06ONJ- Adria white. PNC checks were undertaken for each of these vehicles and confirmed the following registered keepers: Anne NEVIN (the 40th Defendant); John NEVIN (the 41st Defendant); Jill VINCENT (the 60th Defendant); Kevin MAUGHAN (the 95th Defendant).

- (i) There were reports from a primary school (Fullwood Primary School) which backs on to the Tesco subject to the report. The children of the travellers were pressing the buzzer to the school gate and telling staff “F you” and “giving the finger”. The buzzer had to be disabled.
- (ii) The report states that private bailiffs had been employed and served notice, no further information is present as to how this was resolved.

7.22 Shannons Nightclub, Cameron Road- 14/09/17 – CRIMINT JIRT00384995 Exhibit EG32, CAD 3034/14SEPT17. Police attended an encampment on the old Shannons nightclub site at 1245hrs on 14 September 2017. Officers confirmed with the travellers have stated there are four caravans on site and approximately 20 people including 6 children. They stated there was a family wake that day and the funeral of a family member on the 17th September 2017. They stated that if the owner wanted them off the land they would have to serve them with a court order. The reports confirm the following:

- (i) That there was some expensive machinery on the site, including £500,000 worth of piling rig belonging to a piling contractor, which was enclosed with wooden gates and fence. The contractor contacted police and informed the police that the travellers had broken down the gates to the site and forced entry onto the site;
- (ii) The landowner of the site informed police that the travellers were damaging the site and that the site was under construction and that the travellers children were running around the site and may get injured;
- (iii) The travellers were refused to allow the contractors and landowner to remove the piling rig from the site and threatened to break the hydraulic pipers which would spill oil and diesel and it could ignite and that there was a vulnerable vehicle nearby. The contractors had sent machinery to remove the piling rig from the site, but the travellers were threatening to smash it up;
- (iv) The male travellers on the site became slightly aggressive and protected the gate from police entering. It is unclear from the CADS how this incident resolved.

7.23 Ashton Playing Fields 598 Chigwell Road Woodford Green Essex IG8 8AA - 14/09/2017 –Crime Report 418625/17 Exhibit EG33. Officers were flagged down outside Ashton Playing Fields whilst conducting patrols along

Chigwell Road. A victim who works for First Canine has been employed to patrol outside Ashton Playing Fields to prevent travellers moving onto the land. At approximately 1615 hours the victim was stood in the gateway with his dog, when a silver vito van approached. The vehicle was being driven by a traveller. The security guard asked "Where are you going?" and the suspect said "we're going to plot up in there." The victim stood his ground and prevented the van from entering. The driver of the vehicle then drove the van towards the victim and slowly pinned him against the gate. The victim has received no injury or pain but was pinned against the gate for a matter of seconds. The van then drove off towards Rodding Lane North, did a loop again and then drove off. The victim did not get the VRM of the vehicle. He did notice that the back of the van had a window tapped up with silver duct tape. This was the only distinguishing feature that the victim noticed. There was no CTTV to capture the incident.

7.24 Farley Drive- 13/09/2017 – CRIMINT JIRT00384977- 13/10/17- Exhibit EG34 Police were called to a travellers' encampment at a disused building site on Farley Drive, Ilford. An informant reported that they heard a loud bang and that when he looked outside he noticed that the travellers had broken the lock to the site and entered the site. There were nine caravans on the site, with 20 occupants. The travellers stated that they would be staying for around 2-3 days. The Informant reported intimidation by the travellers. It is unclear from the CAD how this incident resolved.

7.25 Clayhall Park- 08/09/2017- CRIMINT JIRT00384856 – CAD 4110/8SEPT17-Exhibit EG36. Police received a call from Redbridge Council stating that a large group of travellers had been evicted from Ashton Playing Fields. They had attended Clayhall Park and one car and one caravan had entered the park and been abandoned.

- (i) Police attended the location and spoke to the park keeper, he stated that someone had driven the car and caravan into the park, before being picked-up in a small grey car and leaving the park. Police

approached the caravan, but it was unoccupied. VRM of the vehicle was AO10LNZ. Council had already blocked the vehicular access into the park. They had then left a note on the car with a phone number so they could let the car out.

(ii) Police then attended the park at about 1700 hrs and the caravan had been removed. Park was still locked and secure.

(iii) The PNC records the following registered keeper/insured drivers: Martin MCDONAGH (the 88th Defendant); Scott CONNOR (the 89th Defendant); Bridget WARD (the 90th Defendant); James MCDONAGH Jnr (the 91st Defendant); James MCDONAGH (the 92nd Defendant); Winnie MCDONAGH (the 93rd Defendant)

7.26 Ilford Synagogue- 08/09/17 – CRIMINT JIRT00384853- 08/09/2017- Exhibit EG37. On 08/09/2017 the informant who is the security office at Ilford Federation Synagogue 2a Clarence Avenue Ilford IG26JH sent me an email stating that members of the traveller community have allegedly moved onto the old Valentine pub in Perth Road at the Gants Hill end of the road. The informant stated that members of the community have complained that they feel intimidated walking past the venue whether it being during the week or on the Sabbath during the weekend. No further information was provided.

7.27 Wanstead Rugby Club, Roding Lane North- 06/09/2017 – CRIMINT JIRT00384786, CAD 4658/06/09/17- 06/09/17, Exhibit EG38 (see also EXHIBIT EG/36 + 37). The reports confirm that travellers had settled on the land two days earlier and had set-up on the lower fields after circumventing the height restrictions at the main access gate. In response Police officers had attended to engage with the travellers, which they refused to do. The management at the Rugby Club also employed a private security contactor to protect the main club house, as this had become the subject of criminal damage and burglary in the past when a similar incursion happened. Police

Supervisors also attended the same day and issued a Section 61 Notice on all vehicles present. Redbridge Enforcement Officers attended on the 5 September 2017 and whilst engaging with travellers encountered aggressive behaviour from the travellers, however with no criminal offences reported. The reports also confirm:

- (i) Officers attended on 6 September 2017 at 1540 and drove down to the lower field and were met by lone female, approximately 60 years old, who came out of a caravan with no VRM. Officers engaged with this female who stated that the caravan belonged to her son, but she did not provide any details of who her son was or any contact details. She stated she was simply visiting for a couple of days and did not know any of the other travellers intentions, but that should we return later “the men” would be back and we could talk to them the, she provided none of her details, officers left the scene;
- (ii) Officers attended at 1730 to engage with the travellers and at that time a team of three Redbridge Enforcement Officers attended to serve a Section 77 Notice requiring the travellers to leave within 24 hours to prevent the court eviction process. These notices were served on the following vehicles: Caravan- no VRM; Caravan- VRM Y843WGO; Caravan- VRM NL59UHG; Car- Black Ford Focus- VRM CP08WEW; Caravan- VRM T113KDA; Caravan- VRM EF05YDG; Mobile Home- VRM S774JTP; Mobile Home- VRM KE55KPF; Car- White Focus Saloon- VRM LT60YND; Car- Silver Audi Saloon- VRM EA11HDF; and Mobile Home- - VRM V154KJN;
- (iii) Police observed the Council’s enforcement officers engaging with the families. One family stated that they were going to remain there until they received the court eviction notice;

87(d)

(iv) The Redbridge Enforcement Officers were wearing Body Worn Video throughout serving the notices.

(v) The following PNC checks were undertaken:

(a) VRM Y843WGO, White Ford Transit, No Insurance held,
No report

Previous RK has told the DVLA no longer keeper;

(b) VRM NL59UHG, White Ford Transit, No reports RK Pat
WARD from Herts, Insurance held to Patrick WARD from
BURGESS HILL;

(c) VRM CP08WEW, Grey Ford Focus, No reports, Insurance
held to Scott wynter of Flat 50, Oldmead Housem Exeter
Road Dagenham;

(d) VRM T113KDA, White Peugeot Boxer Caravan, RK-
Michael Ward of Middlesex, Insurance held, No reports;

(e) VRM EF05YDG, White Ford Transit, No reports, RK- Daniel
SHARP of NORTHANTS, insurance not held;

(f) VRM S774JTP, White Fiat Ducato, No reports, RK- Joe
MCDONAGH Insurance held to David WARD from
Leicestershire;

- (g) RM KE55KPF, White Motor Caravan, Previous RK has told the DVLA no longer keeper, Insurance held to James WARD at 11 Park Road, London, N182YS ,One report;
- (h) VRM L EA11HDF, RK- T60YND, White Ford Focus, Previous RK has told the DVLA no longer keeper, No reports, Insurance not held;
- (i) VRM, Silver Audi A4, RK- DAN SHAW, 104 CORLAND ROAD, LONDON, N97AY, No reports, Insurance shown held to Martin WARD of 81 Barbot Close, London, N99XQ;
- (j) VRM V154KJN, No trace of VRM.

7.28 Wanstead Rugby Club Roding Lane North, Woodford Green, Essex, IG8 8JY - 04/09/2017, CAD 3459/05SEPT17, Crime report 4417920/17-04/09/17. An informant called stating that travellers had moved onto the field of Wanstead RFC. Reporting damage to their gate. The report confirms:

- (i) On attendance police were met by private security hired by the club who stated that travellers had accessed the field by cutting the padlocks to the gates and height restrictions;
- (ii) The club chairman states that he has viewed the CCTV of the incident. He stated that the CCTV recorded that at 2225 hours, a white van (believed to be a ford transit, however unconfirmed) with an unknown VRM, pulled-up at the gates. Two, unidentified males exited the vehicle and proceeded to cut the padlock of the gate. They then used a grinder to cut the padlock off the height restriction barrier. They did not open the gates and simply drove away;
- (iii) Approximately an hour and a half later a number of vehicles are seen to approach the gate, open it and drive through it;

- (iv) On police attendance there were 7 caravans on the grounds situated to the far left corner of the club's grounds;
- (v) Victim concerned about fly-tipping, on attendance officers went to the area and could not see any evidence of this, however the grounds were extensive;
- (vi) No remnants of padlocks/chains could be found at the scene, no forensic opportunities identified. CCTV cameras used to record the incident were situated approximately 100m from the gate, where the offence was committed. Due to the distance, time of night/visibility it was not possible to identify the two males involved, nor link the incident to the travellers that later arrived at the location.

7.29 **Aston Playing fields- 01/09/2017- CRIMINT JIRT00384656- 01/09/17.** Police attended Ashton Playing Fields on 01/09/17 and spoke to those present. There were no signs of criminal damage ASB heightened criminality no rubbish and officers were unable to confirm links with the disorder the previous night at the prince regent PH. The travellers stated that all the individuals in their group were accounted for and I understand the investigating officer is going to a different borough to speak with the victim of the incident at the prince regent. The travellers have said that they will leave on Monday as the children are looking to attend a school in the Tottenham/Enfield area so they will be heading there early next week. There were 11 caravans and 7 cars but in consideration of all information available it is not proportionate to issue a section 61 at this time. The council have also been in contact with the travellers. The vehicle on the field were: PK53OHE; PX56ODW; AO10LNZ; DN12NMJ; LB10ZBB; EJ55NKE; AE02EGK; and NX05KFT. PNC checks were undertaken for each of these vehicles and confirmed the following registered keepers: James WALSH, Sean CASEY, Martin MCDONAGH, Rosemary PERKINS, Karnail SINGH, Peter WHITE, Mark COLLINS, Gerrard MCDONAGH

- 7.30 **Ford Sports & Social Club- 01/09/2017 – Crime report 4417699/17-01/09/17-Exhibit EG41** Aldborough Road South, Ilford, Essex, IG38HG. An officer called and spoke to the victim. He said there was a traveller's site at the venue. They were served with an eviction notice from the High Court. On the day and at the time shown a group of 15 youths, age range from 3-14 yrs, both male and female came onto his property. One of the youths used a brick to smash 4 of the windows. The group also tried to set fire to a propane gas canister, they damaged two trolleys and cut the chain on the gated compound that they keep the propane gas. The suspect has been caught on CCTV and there are good facial images. G4 were in attendance and the travellers were refusing to move. When he informed them that they had CCTV of the incident which identified the youths, they packed up the site and made off. They have left over rubbish and debris which will cost the informant approx. £5000 to clear. The informant said there is little to no chance of us finding the suspect and said he just needed the crime number for insurance purposes.
- 7.31 **Marston Road, Ilford- 29/08/2017 – Crime report 4417438/17-29/08/2017-Exhibit EG42** Marston Road, Ilford, Essex, IG5 0LY. Reporting fly-tipping saw 2x female looked like travellers dumping black bag on the street; she told them not to do it they shouted and gave her the finger took the bag and went up the road and dumped it further down the street before leaving.
- 7.32 **The Valentine Public House- 24/08/2017 – Crime report 4417155/17-24/08/2017- CAD 8373/24Aug17 (LINKED 5305/25, 85878/24, 9296/24, 7134/25, 9505/24) Exhibit EG43.** The Valentine Public House, Perth Road, Ilford, Essex, IG2 6FE. It looks like someone has broken into PH opposite and caravans in there. The area was gated off as its waiting to be knocked down. I can hear crashing and people running around the boarded up PH. It looks like travellers. This is on CCTV it's the valentines, red ford transit VRM 11ke6278 with 1x caravan at the moment. VRM no trace as foreign plate.

CCTV confirmed at least 1 adult male and at least 6 children under 12 on the site. A further informant called in and stated that his mother was talking to a neighbour in the area and one of the travellers made a gun gesture to the neighbour. This was captured on CCTV. the travellers have damaged a wall in order to gain access to the Pub and its grounds. There are numerous linked cads which confirmed the same.

7.33 Old Maypole Public House- CRIMINT JIRT00384079- CAD 9820/08/17-10/08/1710/08/2017 – Exhibit EG44. Police were called to the Old Maypole Public House, Fencepiece Road, Hainault Essex, by staff as there were approximately 30 travellers at the location. The manager stated that they were drunk, smashing the pub and car park-up and armed with bottles. Officers attended and found approximately 20 travellers outside the premises in the front pub garden. There were three men and 10 women still inside. The three males left to join the rest outside, but the 10 women did not leave until the drinks and glasses were taken from the table. Eventually the final females were removed from the pub. A few left in taxis but the remainder sat on the benches outside, next to the car park. Some removed cans of beer from their bags and carried on drinking. It was believed the one of the group went to the off licence on Fencepiece Road and purchased a box of 24 Budweiser's and returned to the group. The main antagonist left, Police waited approximately an hour before leaving as the group had shrunk to approximately 15. Police were called back approximately an hour later as the travellers had set light to something in the car park. When Police arrived it was established that the Budweiser box had been set alight for warmth. Officers had to remain for another hour or more before they eventually dispersed. The staff from the pub admitted that they had been servicing the group all afternoon, they were still servicing other customers on Police arrival and the table was packed solid glasses both empty and full.

7.34 RAY PARK SNAKES LANE EAST-04/08/2017 – CRIMINT JIRT00383983, CAD 4675/4AUG17- 04/08/17-Exhibit EG45. Police were called to assist

with the eviction of travellers whom had been staying at Ray Park Snakes Lane East. Redbridge Council had been to the site on the 3rd August and conducted welfare checks on all the adults and children. Housing and social services assistance was offered, but refused by the Travellers. They had no safeguarding issues with any of the children. On this visit they had issued notices to all vehicles and residences, giving them 48 hours to leave the venue. This ran out of 4pm on the 5th August. We have had a briefing with Redbridge Council who informed us that they wishes us to serve a s.61 notice on the caravans, and they would also be issuing s s.77 notice. Officers then attended the venue and issued both notices to all vehicles in the park. However, upon speaking to Joe a spokesperson for the group an agreement was made that they would leave the park at 6pm on Saturday 05/08/2017. S.61 notice was amended to reflect the agreed departure time. Officers were tasked officers to re-attend the venue on the 5th August at 1730 hrs to facilitate their departure. The following vehicle registration numbers were recorded and issued with a s.61 notice. BWV was also captured by A/PS Graham in this matter; KM60HFW; GD10XRC; KF07OOC; PX56ODW; PK53OHE; SG16EBJ; HV53VAU;DN12NMJ; R695TWB; JXZ5585; FN63XBX; SP09MDV; LB10ZBD; AE02EGK; EK12COJ and FY02OUH. PNC checks were undertaken for each of these vehicles and confirmed the following registered keepers: Patrick MCDONAGH, Sean CASEY, Sean WALSH, Thomas MCDONAGH, Paul NEWTON, Rosemary PERKINS, Peter MARSON, Bridget MCDONAGH, Kathleen GOLDTRAW, Karnail SINGH, Mark COLLINS, David MCDONAGH, Peter MCDONAGH.

7.35 **ROYSTON GARDENS ILFORD- 17/07/2017 – Crimint JIRT00383722- CAD 1547/21JUL17 & 5309/24JUL17-Exhibit EG46.** On 24th July 2017 the local council enforcement contacted police requesting a section 61 to be served on a travelling community within the green space site behind Royston Gardens, Ilford nearby to Redbridge Roundabout. Officer from Newbery Ward SNT attended the site with Redbridge Council enforcement and social

services at approximately 1630 hours, whereby there were seven caravans, 3 cars and 3 vans present on the open green space. The occupiers (three males and one female) were spoken to. The enforcement officers had spoken to them previously and advised them they needed to leave the site. A section 61 was also issued on 22/07/2017 (had to be reissued due to not locating a signed copy). The occupiers were informed that suitable notice had been given to them but they made no attempt to move. The Travellers advised that they would be unable to leave until the afternoon of 25 July 2017. It was decided between police & Council that this would be acceptable, and they were then advised accordingly, of which they replied they were lying about being able to leave tomorrow.

7.36 KINGSLEY ROAD, HAINAULT- 16/05/2017 – Exhibit EG50 CRIMINT JIRT00381556. On 15th May 2017 at approximately 1200 hours VIW1 received a letter through the post with a 'Pete tucker' "USA" "CARS' business card and £50 in cash wrapped in a sheet of daily newspaper dated 12th May 2017. The informant states that they feel they are being targeted by the travelling community due to they have a caravan parked in their front driveway of XXXXXX and is constantly having people who they believe are from the travelling community knock on their front door, also if the informant is out in their front garden they are stopped by people they believe to be from the travelling community and the informant is receiving business cards and notes through their door, from people asking the informant to sell their caravan.

7.37 ROEBUCK ROAD HAINAULT- 21/04/2017 – Exhibit EG52, CRIMINT JIRT00380937. On Friday 21/04/2017 at 1628 hours HAINAULT SNT were emailed about a suspicious vehicle that had been seen on the Hainault Business Park- Roebuck Road Hainault on both 20/04/2017 and 21/04/2017. The informant stated they had been 'travellers' approach their workshop looking for steel in their skips and were apparently rude to

members of staff- seen using VRM SO04VVK- nothing further known. PNC shows this to be a white NISSAN panel van r/k Mr. David COLVIN of 19 Blake Court South Woodham Ferres Chelmsford Essex CM355XY Keeper since 10/02/2017, Notified off road expiry 01/01/05.

7.38 ROYSTON GARDENS- 21/04/2017 – Exhibit EG53, CRIMINT JIRT00380931 CAD 3804/21APR17- 21.04.17 On 21 April 2017 officers were contacted by a local council enforcement contact regarding suspected 10 caravans from the travelling community arriving on the open green space site behind Royston Gardens nearby to Redbridge Roundabout. Officers from Cranbrook SNT attended the site at approximately 1300 hrs whereby there were four caravans present on the open green space. Officers spoke with a Mr William Doherty who was present who informed officers they were only looking to stay for a few days and will be moving on within the coming few days. Whilst police were on the scene, Redbridge Council enforcement were also present and were in the process of completing a number of forms in regard to serving notice period for their presence in the area.

7.39 BOURNE COURT WOODFORD AVENUE- 16/04/2017 – Exhibit EG54, CRIMINT JIRT00380857, CAD 1410/11APR17- 16/04/17. Police attended Bourne Court Woodford Avenue on 15th April 2017. Parked in the rear corner of the car park were three caravans along with one white Peugeot Boxer van. These vehicles are believed to be parked illegally. The police have spoken to Michael, a security guard at the venue, who states that they arrived on Monday. They have since been to court and have received an injunction. He believes that this is going to be actioned at some point next week. I have advised him that, at present there isn't any need for police action. Vehicles YF13VKJ, Reg: JUN13 93a FRANCIS ROAD, BOXER 335 L3H2 PROFESSI CC: 2198 LONDON E10 6NT , WHITE PANEL VAN VEL: NOT HELD C/F: VF3YCTMFC12414210, E: TRJ50652349 KEEPER SINCE 02/07/16 INS: HELD MOT EXPIRY 20/07/2017, (Reg On Caravan) RE61UTB MR FREDRICK

PAGE FORD (Europe), REG: NOV11 18 PARKLAND GROVE TRANSIT 125 T280
FWD CC: 2198 70265600580, WHITE ASHFORD MIDDLESEX TW15 2JW,
PANEL VAN VEL: NOT HELD C/F: WFOXXXTTFXBU64782, E: BU64782 KEEPER
SINCE 04/06/16. INS: HELD MOT EXPIRY: 16/12/2017 HAS TOLD DVLA NO
LONGER KEEPER, VEL EXPIRED (Reg on caravan), PX56ODW PREV VRM:
b11jcg Mr SEAN CASEY. PEUGEOT (FRANCE_ REG: OCT06 93 FRANCIS ROAD,
407 SW SE HDI CC: 1997 LONDON E10 6PL SILVER ESTATE VEL: NOT HED
C/F: VF36ERHRH21 504677 E: DYVD4040281, KEEPER SINCE 11/10/16, INS:
HELD MOT EXPIRY 09/09/2017. VEL EXPIRED/ CHERISHED TRANSFER . PNC
checks were undertaken for each of these vehicles and confirmed the
following registered keepers: Charlie MCDONAGH, Frederick PAGE, Sean
CASEY.

**7.40 GOODMAYES LANE- 26/11/2016 – Exhibit EG58, CRIMINT
JIRT00377571, CAD 9174/25NOV16 REFERS 26/11/16.** Police attended a
disused site on Goodmayes Lane that is shown as NHS Redbridge Old
Maysbrook Clinic following a report that travellers had managed to gain
entry to the site and have set-up a site at the location. On police attendance
there was one caravan and a ford transit on the site and the occupant was
spoken with who gave his name as Patrick Ward. He stated that he was
planning on staying for no more than a couple of days as he would be
making his way away from Redbridge to somewhere in Berkshire.

**7.41 Nursing Home, Little Heath- 14/11/2016 – Exhibit EG61, Crime report
4421560/16.** This report relates to an allegation of theft from a motor
vehicle. The Victim was a delivery driver. The victim had arrived outside the
venue in order to make a delivery to a Nursing Home. The victim parked-up
outside the nursing home to take out the parcel to be delivered. The victim
then heard a noise at the front of his van and looked around. A female
working at the nearby nursing home advises Victim that suspect has just
been into his vehicle and stolen some property. No details taken. Victim
called out to the suspect who walked off in the direction of a “temporary

traveller site” which had appeared on the green overnight. The victim immediately reached into his bag in the front near side of the van. His wallet was still present, but all his bank cards and his MP3 adaptor was missing. The victim then followed the suspect in direction of the “traveller site” consisting of two camper vans and two caravans. The victim shouted towards the suspect “ *I know what you have stolen. You have been seen I am going to call the police*”. At this point, a man believed to be the son of the suspect appears with all of the victim’s missing property and hands it back stating “*call the fucking police if you want.*”

7.42 REDBRIDGE COLLEGE, LITTLE HEATH, 13/11/2016 – Exhibit EG62 CRIMINT JIRT00377163 CAD 7837/13NOV16. Police attended the green area to the front of Redbridge College Little Heath Bartlett Road Ilford following a call regarding travellers setting-up camp at the location. There was one caravan and a motor home present along with a white transit van. The travellers were spoken with and they stated that they were likely to be staying till 15/11/2016 at the latest. They have been advised to leave the area as soon as possible as it was not a suitable place to make camp. Whilst en route to this call PC MAHONEY 880JI updated officers that the land that the travellers were on is a site of special interest and there is an archaeological dig due to take place at the location. Travellers initial assessment form has been completed by PC HILL and attached to this Crimint. It is unclear from the reports how this resolved.

7.43 ROYSTON GARDENS 12/11/2016 – Exhibit EG63, CRIMINT JIRT00377147 CAD 9567/10NOV16. Police called to attend in relation to a travellers’ site being located within the area of Royston Gardens, Ilford, Essex, IG1 3SY. Travellers encamped within the area for a wedding taking place in Brentwood, and have informed police that they will be leaving on the 13/11/2016 at 1700 hours, which is the time stated within the eviction notice issued by REDBRIDGE council. There is currently security on the traveller’s site which runs 24 hours, called COVERDALE security.

7.44 ROYSTON GARDENS- 11/11/2016 – CRIMINT JIRT00377121/ CRIMINT JIRT00377095 Exhibit EG64 & 65

- (I) On Friday 11th November 2016 at approx..0807 hour police attended the fields at the rear of ROYSTON GARDENS WANSTEAD to reports of an unauthorised encampment on the fields. Police were called by a member of public who noticed the encampment at approx.. 2335 hours on THURSDAY 10 NOVEMBER 2016. On police arrival there were nine caravans and four vehicles on the site. There were no animals visible from the site at the time of police arrival.

- (II) The site is a recreation ground with a football pitch that appears to be unused due to the length of the grass on the field. There are track marks which appear to have come from the vehicles that have been driven from the junction at ROYSTON GARDENS though a gate that has been secured with a bike lock after access has been gained it is unknown if the gate was secure prior to the arrival of the caravans.

- (III) At the time of police arrival there were no persons present on the site from the encampment. A member of public was at the location with her dog and she stated that it is believed that the travellers arrived over night as they were not there yesterday when she walked her dog through the field in the morning.

- (IV) There were no issues present at the time of police arrival Redbridge community policing team attended the location after our visit and Redbridge council has been made aware for their enforcement officer by JI GPC

- (V) On 10/11/2016 at approx. 2330 hours Police were called to the playing fields to the Rear of ROYSTON GARDENS. Informant stating that

Travellers had moved onto the recreation ground. On police attendance, counted x8 caravans and x8 vehicles.

(VI) Due to the hour officer did not speak to all residents but were able to speak to one representative of the travellers, John Lawrence, who stated that they were here to attend a wedding in Brentwood, would give no further information. John LAWRENCE warned officers to be careful of Dogs that may be loose and belong to the other families, however no dogs could be seen.

(VII) Entry appears to have been gained through the gate, no damage could be seen and a new bike lock appears to have been placed on the gate (presumably belonging to the travellers).

(VIII) VRM's of vehicles at the site were: HV03BNK, OND25659, OZG2747, CK16JKF, HY65CTO, MW52DGX, SD16KHO, UHZ4627. PNC checks were completed linking the vehicles to the following defendants: Mark FRANCIS, Edward MCDONAGH,

7.45 The WILLOWS, Forest Road- 23/07/2016 – CRIMINT JIIRT 00374117 - Exhibit EG72/73

(I) On 22/07/16 at 1900 hours police were called to The Willows wedding venue on Forest Road due to ten caravans breaching there security gates and potting up. There were approximately five hundred guests attending the venue for a wedding at the time and the travellers took advantage of the wedding guests entering and leaving the main gates in order to get into the premises which is privately owned. Redbridge Council emergency planning were informed of the events and police stood by to prevent a breach of the peace. The travellers aware of the law and once plotted decided to leave via the main gates of the venue at which point on their return, the venue owner refused to let them back in. This caused the traveller to leave his

vehicle obstructing the main gates preventing guests from entering or leaving. Police on scene resolved this issue but tensions remained high which warranted police remaining on scene.

(II) The spokesperson for the group called Martin stated that they would definitely be gone by Tuesday Morning. The wedding today was a dry wedding however the venue owner has stated that on the 23rd July 16 between 1800 and 0100 they are having a large Jamaican wedding possibly more than 500 people in attendance and there will be alcohol and the possibility of friction between the wedding party and the travellers. RCPT sergeant made aware.

(III) Serial 603B attended the ground of THE WILLOWS, Forest Road, Ilford. JIRT00374103 refers to travellers being on the land with caravans. Serial 603B attended the location with an Enforcement officers and a Sec 61 notice was served for the Travellers to leave the private land. There were several vehicles on the site, but all persons and vehicles left.

(IV) The following vehicle were seen on the site: DY08UJX- Grey Mitsubishi Pick up, KV578HYM, YK14OVM- Metallic coloured Ford Van, YC54GFY- TRANSIT TRUCK, FA65FDF- BLUE VW GOLF, YD55CXX- TRANSIT- WHITE, BL55FAK- WHITE FORD TRANSIT, THZ9247- VW WHITE PASSATTE, NCZ9649- TRANSIT, DG54JYX- TOYOTA AVENCIS, THZ7695- RED VAUXHALL, UNZ6279- WHITE VAUXHALL ANTAM. PNC checks were completed and confirmed links to the following defendants: Ioan COVACI, Martin STOKES, Simon MONGAN, Martin HURTARDO, Michael STOKES, Ernest MILO, Antony STOKES, John CATHERWOOD.

7.46 The Friars in Chigwell- 30/06/2016 – CRIMINT JIRT00373489 - Exhibit EG76

87(q)

(I) On 30th June 2016 at approx. 1030 hours a member of the public has witnessed a Blue Vauxhall Combo van VRM DU61NAO pulled up in The Friars in Chigwell Essex. The vehicle has pulled up outside an address at The Friars. A male got out of the vehicle and was looking around the address. A neighbour thought this was suspicious and challenged the male. The male stated he was plying for work and wanted to leave his business card, however, when the member of public said to the suspect "why isn't everyone in the street getting a card" the suspect became evasive and made off in his van.

(II) The male was described as IC1 and Eastern European, but no further details were given.

The vehicle is registered to Patrick O BRIEN DOB. The male is known previously for artifice burglaries, going equipped, thefts and fraud. It is likely that the occupants of this vehicle are attempting to gain entry to burgle from them. O'BRIEN is known by police as a member of the travelling community and works cash in hand and does not pay tax. He used a small red Vauxhall combo van and a small silver Vauxhall van for the burglaries which he has now disposed of. He is also driving with no insurance and uses another person's identity to drive.

7.47 GEORGE GREEN – 22/06/2016 – CRIMINT JIRT00373249 - Exhibit EG77

(I) Officers attended the GEORGE GREEN, WANSTEAD, the park area next to WANSTEAD L.T. Reports were made of approximately 20 Caravans on the Green, as well as multiple cars/vans. Officer's ascertained that the owners were travellers and spoke to the man in charge called Tom. Officers were advised that the travellers would be staying for a couple of days, they were advised that the council will look to evict them. The travellers stated that they had come from DAGENHAM. Officers were

made aware that a group has been evicted that morning from RAINHAM.

- (II) Officers were then made aware that the area is CITY OF LONDON CORPORATION land and that Epping Forest Constables would be attending. They arrived shortly after. The constables advised the travellers regarding the land and gave them an hour to vacate, which they agreed to after a short argument. The travellers vacated the GREEN, made their way to the GREEN MAN roundabout. Officers were made aware later that the travellers had set up in the BUSH ROAD, E11 area, but the original officers were unable to re-attend.
- (III) VRMS were noted as: AE56YDH, FA65FHP, VU18543, 11D53117. PNC checks were completed and confirmed links to the following defendants: Lee PIERSON, Simon MONGAN.

7.48 27/04/2016 – CRIMINT JIRT00371615 - Exhibit EG80 and 81.

- (I) On the 21/04/2016 Martin WARD (SNR) Martin Ward (JNR), and an English traveller named BURTON who resides on the MITHY FENN Travellers Site, Cottenham committed a residential burglary at an address in SNARESBROOK.
- (II) The WARD'S, who are known travellers, have previously burgled the same address a few days beforehand, which is occupied by an elderly male suffering from dementia. They have stolen expensive pictures, silver, vases and china. The Ward's are currently using a White CITROEN BERLINDO Van VRM BL14RZW

7.49 MILL ROAD- 11/04/2016 – CRIMINT JIRT00371092 - Exhibit EG82

- (I) Informant states that a group of travellers have moved onto a site MILL ROAD / PRIOR ROAD ILFORD. Believed to be around 5 caravans plus assorted vehicles. The land is private land

7.50 High Road, Chadwell Heath- 29/03/2016 – CRIMINT JIRT00370723 - Exhibit EG84

- (I) At approx.. 2200hrs on the 29/03/2016 police attended 1051 HIGH ROAD CHADWELL HEATH, the site of the Bar and Grill public House, now closed down, after a report received of Travellers moving in on the site. Damage was caused to the site entrance gate, however no witnesses were willing to come forward and point out who had carried out the damage. Police spoke to the father of the main family of this group, a Francis STOKES, dob 26/07/1971, who stated that his family had travelled down from Wigan to pay their respects to a traveller who had been killed during an incident in Stratford, approx. 10 days before. Apparently the family were due to travel back to Wigan, soon after paying their respects. Mr STOKES stated that the family had stayed on a site in Dagenham yesterday.
- (II) There were no amenities on this current site, Water, Electricity and were instructed by Ji1 to leave the site by 0900hrs tomorrow morning and issued with a section 61 of the Criminal Justice Public Order Act notice.
- (III) Family members included a, Michael COCHRANE, Steven STOKES, Francis STOKES JNR, Tom STOKES. The following are vehicles used by this group:, LT54OVF, White Transit van , BL55FAK, White Transit van,

XFZ3076, White Transit van, GJ072ZWF, red Skoda Octavia, XFZ431, White Peugeot Partner Van. 151-D-26273. Vehicle on Irish Plates. PNC Checks were completed on the vehicles and confirmed linked to the following defendants: Mohammed JALLAH, James STRINIER.

7.51 HIGH ROAD ILFORD 19/03/2016 – CRIMINT JIRT00370452 - Exhibit EG87

- (I) ON Saturday 19th March 2016 at approx.. 1730 police received a call stating that caravans had moved on to the site of 450 HIGH ROAD ILFORD, CHARTER HOUSE. This site is currently to let and no one occupies the building on the site. There are fences and gates around the site.
- (II) J14L attended and notes that there was 5 IC1 males standing near the gates of the site. The older of the males engaged with police and stated that they are Irish Travellers and they are in the area for a family visit and plan to stay on the site for up to two weeks. They all refused 'pars' and stated that they have 4 caravans and 4 vans (transit style) on the site. The elder male stated that they have children and women also on the site but police did not see any women or children at all.
- (III) From the front of the site only 2 caravans and 2 vans could be seen. The site was only accessible by climbing over a wall. The front gate to the site was locked and the travellers had placed a sign on the gate. At this stage police are unable to confirm if the gates were secure when the travellers arrived.
- (IV) J14 tried calling the company advertising the site, however there was no option to leave a message, an email was sent with the CAD number informing them that police have attended and what the current situation is.

Statement of Truth

I believe the facts contained in this witness statement are true.

Signed: *[Handwritten Signature]* 118P

Name: GRISE GELATLEY - INSPECTOR

Date: 8 MAY 2018

Claimant

T Scott

First

Exhibits: TS/1 – 29

Date:

**IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION**

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

**(1) MARTIN STOKES & 99 OTHER NAMED DEFENDANTS
(101) PERSONS UNKNOWN**

Defendants

WITNESS STATEMENT OF TRACY SCOTT

I, TRACY SCOTT, Senior Redbridge Enforcement Officer of the London Borough of Redbridge WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's application for an injunction against the above named defendants. The facts stated in this statement are from my own knowledge unless otherwise stated. Where the facts are not in my direct knowledge, they are true to the best of my knowledge and belief.

2. I am employed by the London Borough of Redbridge in the Place Directorate as a Senior Redbridge Enforcement Officer. I am accredited under the Community Safety Accreditation Scheme.
3. In April 2017, the Redbridge Enforcement Team took over responsibility for the London Borough of Redbridge's ('LBR') Unauthorised Encampment Protocol. Prior to this, responsibility for unauthorised encampments in LBR lay with the Emergency Planning Team.
4. Since April 2017, one of my key responsibilities as a Senior Redbridge Enforcement Officer has been to manage reports and incidents relating to unauthorised encampments within the Borough in accordance with LBR's Unauthorised Encampment Protocol. This process involves carrying out initial site visits in order to confirm the reports, completing initial assessment forms, arranging welfare checks with other Council departments, serving eviction letters and notices, obtaining Court summonses, serving the summonses, giving evidence at Court hearings and evicting trespassers and travellers off of Council owned land.
5. Since April 2017, I have responded to a number of unauthorised encampments in the Borough, detailed below. A regular feature of unlawful encampments is the deposit of human waste. On the majority of

sites which I have attended, I have witnessed human faeces being deposited in the open air and in bags. Photographs were not regularly taken of this feature due to officer's reluctance to approach the deposits.

21st April 2017 – Kearley and Tonge Sports Ground

6. On 21st April 2017, my colleague Carl Bradley, Senior Redbridge Enforcement Officer, received a complaint regarding an unauthorised encampment on Council land at the Kearley and Tonge Sports Ground, Royston Gardens, Ilford, IG1 1SY. In order to try and reassure local residents, and in an attempt to reduce any damage to the site, John Richards, Head of Civic Pride and Enforcement, asked that I arrange for a security guard to be deployed to the location. I arranged for an officer from Coverdale k9 Security Service Limited to attend the site and remain in place for the duration of the incursion at a cost of £240. At [Exhibit TS1] is a document relating to this, namely an invoice from Coverdale k9 Security Services Limited.

27th April 2017 – Woodford Town Football Club Development Site

7. On 27th April 2017, whilst on duty, I received a complaint from a local resident regarding an unauthorised encampment on Council land at the Woodford Town Football Club Development Site, 267-269 Snakes Lane

East, Woodford Green, Essex, IG8 7JJ. I conducted the initial visit with my colleague Simon James, Senior Redbridge Enforcement Officer, on the evening of 27th April 2017. Officers from the Metropolitan Police Service (MPS), having also been called by local residents, were already in attendance and advised myself and Mr James that the travellers had gained entry by cutting through the chain and padlock on the front gate. There were three vehicles on site, two mobile homes and a transit van with a caravan attached to it. I was able to obtain the registration numbers of two vehicles: NL06 GXB and LL15 OPE. At [Exhibit TS2] is a document relating to the initial visit, namely LBR's Unauthorised Encampment Protocol's 1st Visit Form.

8. Mr James and I then spoke to the gentleman that appeared to represent the group. I asked for the names of those encamped on the site, the man refused to answer. I made it clear to the man that as the group had not sought permission from the Council to encamp on the land, they were there unlawfully and trespassing. I asked the man how long the group intended to stay and he replied that they planned to leave on the evening of 30th April 2017.

9. Whilst on site, Mr James and I spoke to a number of local residents, all of whom expressed concerns about the travellers being there. In order to try and reassure local residents, and in an attempt to reduce any further damage to the site, I sought permission from John Richards, Head of Civic Pride and Enforcement, to deploy a security guard to the location. On the morning of 28th April 2017, I arranged for an officer from Coverdale k9 Security Service Limited to attend the site and remain in place for the duration of the incursion at a cost of £1492.50. [Exhibit TS3] is a document relating to this, namely an invoice from Coverdale k9 Security Services Limited.
10. On the morning of 28th April 2017, I returned to the unauthorised encampment with officers from the Council's Housing, Children's Services and Adult Social Services departments in order to conduct the welfare visit. The officers and I were met with hostility; the gentleman that appeared to represent the group was abrasive and refused us entry to the site. My colleagues went on to ask the man whether the group had any health, social, housing issues or needs. The man barely engaged and declined all offers of support. I exhibit at [Exhibit TS4] a document relating to the welfare visit, namely LBR's Unauthorised Encampment Protocol's 2nd Visit Form.

11. After confirming that there were no welfare concerns, I sought an eviction decision from Mark Benbow, Community Safety, Transformation and Enforcement Lead. I met with Mr Benbow on the afternoon of 28th April 2017. Mr Benbow agreed that the Redbridge Enforcement Team should seek to evict the travellers from the site. I exhibit at [Exhibit TS5] a document relating to the eviction decision, namely LBR's Unauthorised Encampment Protocol's Decision Form. I then went off duty, leaving my colleague Mr James to serve the eviction letter.

12. On the morning of 2nd May 2017, I received a telephone call from the security guard on site. The security guard stated that the travellers had vacated the land at approximately 1:30 that morning. At approximately 8:30, I attended the location in order to ascertain how much damage had been done to the land. This was the first time that I had been able to gain access to the site. During my inspection, I found a large amount of fly tipped waste, made up of building materials, domestic appliances, garden waste and other general items. I exhibit at [Exhibit TS6] photographs of the fly tipped waste. The site was then made secure by officers from Vision and I stood the security guard down. I then vacated the site.

20th July 2017 – Kearley and Tonge Sports Ground

13. I am aware that on 20th July 2017 my colleague, Sarah Kaye, Senior Redbridge Enforcement Officer, received a report of an unauthorised encampment on Council land at Kearley and Tonge Sports Ground, Royston Gardens, Ilford, IG1 1SY.

14. On 24th July 2017, I attended Kearley and Tonge Sports Ground with my colleague Ms Kaye to assist Sergeant Clark from the MPS with the reserving of the Section 61 Criminal Justice and Public Order Act 1994 notice. Sergeant Clark directed the travellers to leave the land by 25th July 2017; they failed to comply.

15. On 26th July 2017, I went back to the location with colleagues from the Redbridge Enforcement Team and MPS for the purpose of enforcing the Section 61 notice and evicting the travellers from the land. The travellers were successfully evicted on the afternoon of 26th July 2017. After the area was clear of vehicles and caravans I carried out an inspection of the site with Ms Kaye. Upon inspection I found a small amount of fly tipped waste, made up of, cardboard boxes, a timber board, a domestic

appliance, and other general domestic waste. I exhibit at [Exhibit TS7] photographs of the fly tipped waste. Ms Kaye and I then proceeded to the rear of the site, in order to ensure that no waste had been fly tipped into the River Roding. Upon inspection of the river and riverbank Ms Kaye and I found human excrement and used baby wipes. It is my belief that the travellers were using this area as a makeshift toilet. After making arrangements for the sports ground to be secured, Ms Kaye and I vacated the site.

28th July 2017 – Bancroft Rugby Football Club

16. On 28th July 2017, my colleague, Stephen Lewis, Senior Redbridge Enforcement Officer, received a report of an unauthorised encampment on private land at Bancroft Rugby Football Club, Buckhurst Way, Buckhurst Hill, IG9 6JD. Later that day, in order to confirm the report, Mr Lewis and I carried out a site visit. Upon entering the Club's car park, I observed a number of vehicles and caravans parked around the perimeter of the playing field to our right.

17. Mr Lewis and I made our way into the clubhouse where we spoke to a member of the Club's staff. The gentleman informed us that the Club's solicitors had already been instructed to apply for an eviction order and