

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

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WITNESS STATEMENT OF HARVEIL TOOR

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Fiona Alderman

Head of Legal Services

London Borough of Redbridge

Town Hall

128-142 High Road

Ilford Essex

IG1 1DD

REF: ATR/RC-017599

E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)

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**Claimant**  
**D Souza-Smith**  
**First**  
**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**

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**WITNESS STATEMENT OF DAVID SOUZA SMITH**

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I, David Souza-Smith, Senior CCTV Officer of the London Borough of Redbridge, 531 Ley Street, Ilford, IG2 7QZ 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 as a Senior CCTV/ Officer for the London Borough of Redbridge. The Borough CCTV Control room is located at Redbridge Council, Ley Street Dept., Ley Street, Ilford the Borough CCTV is monitored 24/7 by a team of trained and experienced Officers. This facility is utilised by many departments within Redbridge Council, local Police and other agencies. The fixed CCTV equipment is installed at a number of Borough sites and locations, there is also a facility within the team to install and monitor emergency cameras. Such action has to be authorised by Senior Council Officers in conjunction with the Regulation of Investigatory Powers Act 2000 Codes of Practice. Such action has been authorised on a number of occasions as a result of unauthorised trespasser encampments within the Borough.
  
3. On 21<sup>th</sup> April 2017, the Kearly & Tongue Fields site, Royston Gardens, Ilford incurred an unauthorised encampment by travellers with 3 caravans and vehicles; this site is Redbridge Council Land. A cost of £1,125.00 was incurred to install emergency power and cameras and to monitor the incident.

4. On 17<sup>th</sup> October 2017, there was a further unauthorised encampment of travellers at the Kearly & Tongue site with 20 plus caravans and vehicles. As the cameras were already installed they were monitored entailing only staff time costs.
5. In April 2016, there was an unauthorised encampment by travellers with 5 caravans and vehicles on a development site in Prior Road, Ilford, this is Private Land. This incident was monitored by existing cameras, including only staff time costs.
6. On 27 April 2017, there was an unauthorised encampment by travellers at the Woodford Town Football Club site, Snakes Lane East, Ilford. This is land owned/managed by London Borough Redbridge (Vision). A cost of £1,500.00 was incurred to install emergency power and cameras to monitor the incident.
7. At the beginning of August 2017, there was an unauthorised encampment by travellers at Ray Lodge Park, Snakes lane East, Ilford. This is land owned/managed by London Borough of Redbridge (Vision) a cost of £1,500.00 was incurred to install emergency power and cameras to monitor the incident.
8. End of September 2017, there was an unauthorised encampment by travellers at the Redbridge Recreation Ground, Woodford Bridge Road,

Woodford by 20 plus caravans and vehicles. This is land managed by London Borough of Redbridge (Vision) a cost of £2,300.00 was incurred to install two cameras and power to monitor the incident.

9. In September 2017 there was an unauthorised encampment by travellers at the old Dr Johnston pub site in Longwood Gardens, Barkingside. This is privately owned land awaiting development a cost was incurred to re position and monitor a camera. I do not have an invoice but from my professional experience I can say this would be in the region of £600.00.

10. On 24 August 2017 there was an unauthorised encampment by travellers at the old Valentines pub site in Perth Road, Ilford, staff time was incurred to monitor existing cameras in the area. This is privately owned land awaiting development.

11. On 17 October 2017 there was an unauthorised encampment by travellers at the former PH site in The Drive, Ilford. This is a privately owned site, a cost of £1,500.00 was incurred to install emergency power and a camera to monitor the incident.

Statement of Truth

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

Signed: 

Name: DAVE SOUZA--SMITH

Dated: 25/04/18

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

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WITNESS STATEMENT OF DAVID SOUZA-SMITH

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
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P: 0208 724 8379

Claimant

D Lucas

First

Exhibits DKNL1 – 10

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 DAVID LUCAS

---

I, David LUCAS, Area Manager for the Cleansing Department of the London Borough of Redbridge, 531 Ley Street, Ilford, IG2 7QZ 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 currently employed by The London Borough of Redbridge Cleansing Department, as Area Manager for Wanstead and Woodford, and have been so employed for ten years. 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:
  - a. Woodford Football Club, Snakes Lane East, Woodford Green, IG8 7JJ
  - b. Wanstead Rugby Club, Roding Lane North, Woodford Green, IG8 8JY
  - c. Parkland at Hurstleigh Gardens, Ilford, IG5 0RQ
  - d. Redbridge Recreational Ground, Keswick Gardens, IG4 5ND
  - e. Roding Valley Parkland, Onslow Gardens E18 1NE and Elmcroft Avenue, E11 2DU
  - f. Kearley and Tonge Playing Fields, Royston Gardens, Ilford, IG1 3SY
3. The London Borough of Redbridge is the principal Litter Authority for each of these sites.

#### **Woodford Football Club**

4. I was first aware that a number of travellers had occupied land at the football club on 30<sup>th</sup> May 2017, when I carried out a site visit there. By the time I had become involved with this site, and indeed all of the subsequent sites, the travellers had already departed. I had no direct contact with any of the individuals who had occupied any of the sites.

There were a number of what appeared, from my experience, to be multiple 'fly-tips' spread over about half an acre of land, along one side and one end of the land adjacent to the football ground. Again, from my experience, I would describe approximately twenty separate loads of rubbish, mainly building material and office furniture and garden waste, each deposited by a vehicle in the region of seven and a half tonne weight, and each deposit would have weighed approximately five tonnes. At the initial point of this inspection, I didn't see anything that appeared to be hazardous, for example Gas cannisters, Asbestos etc. I took a number of photographs at this site, and I produce them as my [Exhibit, DKNL/1.]

5. Thereafter, my involvement with this site was to arrange clearance of the rubbish from the site. This was carried out by Kenson's Civil Engineering over a period of approximately eight days. I do not have full details of the exact cost to The London Borough of Redbridge for this clean-up operation. Some time after my initial inspection of the site, I was made aware that the rubbish did include an amount of Asbestos, which is a hazardous substance, the proper disposal of which incurs a greater cost.

#### Wanstead Rugby Club

6. I was first aware that travellers had occupied land at the Rugby Club some time in September having received a large number of complaints from members of the public. I visited the site on 21<sup>st</sup> September 2017, at the request of Simon Dale, our Interim Head of Service. Prior to my visit, arrangements had been made for Kenson's to remove rubbish from this site as well, with a view to depositing all of the rubbish at the Chigwell Road Refuse and Recycling Site, as the site is in very close proximity to

the Rugby Club. At the time, the Chigwell Road Site was operated by Shanks, on behalf of The London Borough of Redbridge. I was aware that removal of the rubbish from the Rugby Club had begun. My involvement began as a result of this, because I was made aware that an amount of hazardous waste, namely Asbestos, had been discovered among the initial twelve tonnes of waste removed from the grounds at Wanstead Rugby Club, and deposited at the Chigwell Road Refuse and Recycling Centre.

7. I attended the Centre to organise the removal of those twelve tonnes. It is fair to say that the amount of Asbestos found was minimal, however the Site Manager deemed the entire twelve tonnes as contaminated, and therefore arrangements had to be made for specialist removal and disposal of the waste. As part of the Recycling Centre site visit, I also attended Wanstead Rugby club on the same date to ascertain if there would be any further hazardous waste discovered. There I found a vast amount of rubbish, again, largely building waste, and other rubbish including biological human waste, which had been dumped under the flyover at the back end of the Rugby Club ground. I would estimate the various the various mounds of rubbish were spread out over four to five hundred yards.
8. Again my experience tells me that these were multiple mounds of rubbish left on multiple occasions, by the type of vehicles I have referred to previously, but I would say that these were more likely to be three and a half tonne weight, but I would also say that the loads deposited were greater than that which such vehicles are designed to transport. I then arranged for P.F. Ahern (London) Ltd, a private waste management company, to undertake the removal of the initial twelve tonnes already

deposited at the Chigwell Road Recycling Centre, and all of the rubbish on the Wanstead Rugby Club site.

9. I took a number of photographs of the rubbish at this site, which I identify as my [Exhibit DKNL/2], twelve photographic prints, which include post clearance images. [Exhibit DKNL/3] is three photographic prints of the initial twelve tonnes of waste deposited at the Chigwell Road site. I can say that the total tonnage of waste removed from the Wanstead Rugby Club site amounted to 85.48 tonnes. The cost to the London Borough of Redbridge for the services of P.F. Ahern (London) Ltd was £26,602.85. This figure is contained in invoice number 14667, raised by P.F Ahern (London) Ltd, which I identify as my [Exhibit DKNL/4]

#### Parkland at Hurstleigh Gardens

10. I was also aware of the occupancy at Hurstleigh Gardens on 21<sup>st</sup> September 2017. At the conclusion of my site inspection at Wanstead Rugby Club, I attended this next site, along with representatives from Ahern's, in order that I could obtain a quote for this site clearance. Here I found numerous separate mounds of fly-tipping, much the same as the previous sites, and covering a similar area as the site at Wanstead Rugby Club. I was particularly struck at this site, by the smell of faeces and other human waste.
11. Examination of the various mounds of rubbish revealed, what I knew from previous experience to be, hazardous waste, in the form of Asbestos. I could see it in clear view, co-mingled with other general builder's material and other general rubbish. The site had been cordoned off prior to my arrival, I believe because of the nature of the open land, in a bid to reduce the risk to members of the public using the parkland. This

site differed from the Woodford Football Club and Wanstead Rugby Club, in that it is solely common grassland for the use of the general public. I mention this because, although, as I will expand upon later, the tonnage of rubbish that was subsequently removed was less than that at the Rugby Club site, other logistical problems were identified because of the nature of the land, raising the overall cost of the operation.

12. In order for the waste removal company to be able to operate their heavy machinery on the grasslands, a temporary metal roadway had to be laid in order that the vehicles could move on and off the land to effectively carry out the clearance. Again I took photographs of this site and I identify eight photographic prints as my [Exhibit DKNL/5]. I refer to my [Exhibit DKNL/6], invoice number 14669 raised by P.F. Ahern (London) Ltd, to detail the cost of the operation to clear this site, which amounted to £26,854.42, for the safe removal and disposal of 71.26 tonnes of waste. The Hurstleigh Gardens site is also referred to as Heathcote Avenue.

#### Redbridge Recreation Grounds, Keswick Gardens

13. On 21<sup>st</sup> September 2017, while I was still dealing with the Hurstleigh Gardens site, I was made aware that travellers had undertaken another unauthorised occupation, at the Redbridge Recreation Centre, Keswick Gardens, IG4 5ND. I did not attend the site until 28<sup>th</sup> September, by which time the travellers had left. During the course of my inspection, I found a similar situation to that at the Hurstleigh Gardens/Heathcote Road site. There were numerous piles of what I would describe as separate fly-tips, next to one another, and spread across an area about the size of a

football pitch. The size of the piles again suggested the three and a half tonne vehicles previously described.

14. The Recreation Grounds are common grounds for members of the public to walk and play, and the rubbish, again mainly consisted of building waste, including commercial building waste and office furniture, posed a very real threat to the safety of any members of public using that area. Again the smell of human waste was quite overpowering. During this initial inspection, I did not see any Asbestos, but there was a considerable amount of other hazardous waste such as pressurised Gas and Propane bottles, and five litre containers containing potentially hazardous fluids. I am not in a position to exhibit any photographs of this site. I refer to my [Exhibit DKNL/7], invoice number 14668, raised by P.F. Ahern (London) Ltd, which shows the amount of rubbish for removal and disposal from this site totalled 73.28 tonnes. The cost to the London Borough of Redbridge payable to Ahern's for this Clearance was £26,481.65.

#### **Roding Valley Park, Onslow Gardens E18 and Elmcroft Avenue E11**

15. On 2<sup>nd</sup> October 2017, I attended a site visit at the Roding Valley Park, where there had been another unauthorised occupation. Again the travellers had left prior to my arrival. There are various access points to this area of common ground, which is there for the use of the general public. To my knowledge there are entrances at Onslow Gardens E18, and Elmcroft Avenue E11.
16. During the course of my site I found that there were two distinct deposit sites. One close to Onslow Gardens, the other close to Elmcroft Avenue.

The Onslow Gardens fly-tip was the larger of the two. There were numerous mounds piled close together at each deposit, again from experience, consistent with fly-tips from the 3.5 tonne vehicles I have described previously. The deposits consisted largely of building waste and commercial building waste, and again the smell of human waste was overpowering. I found no immediate trace of Asbestos, but there were numerous pressurised Gas and Propane bottles. This rubbish posed a threat to members of the public. It was quite clear that, in the time between the travellers leaving and the eventual clearance, someone had started fires among the rubbish at the Onslow Gardens End of the site. I have no photographic exhibits regarding this site. However, I will refer to my [Exhibits DKNL/8] and [Exhibit DKNL/9] invoice numbers 30347 and 38561 respectively, raised by P.F. Ahern (London) Ltd. to describe the total amount of rubbish cleared:

- a. **Onslow Gardens E18** – 17.90 tonnes of rubbish removed and disposed of by Aherns, the cost to the London Borough of Redbridge was £9,092.30
  
- b. **Elmcroft Avenue E11** – 10.10 tonnes of rubbish removed and disposed of by Aherns at a cost to Highways England of £7,406.16

17. It should be noted that, given that this is a vast expanse of land it transpired that the area of fly-tip at the Elmcroft Avenue end of the site is actually owned by Highways England, whereas the Onslow Gardens area is owned and maintained by the London Borough of Redbridge. Whilst the initial payment for services provided by Aherns was made by the

London Borough of Redbridge, the cost for the area near Elmcroft Avenue was recouped by the Borough from Highways England.

**Kearley and Tonge Playing Fields, Royston Gardens IG1**

18. The last site I will describe is the Kearley and Tonge playing Fields at Royston Gardens, IG1. From 11<sup>th</sup> to 24<sup>th</sup> October 2017 I was away from work on sick leave. On my return to work I was made aware of the fact




that there had been another unauthorised occupation by trespassers at this site. I did not attend the site until 6<sup>th</sup> November 2017, when I went to hand over keys to Aherns for the temporary security measures that were put in place while I was away from work. I did no actual site examination, but I could see from the entrance that again there were multiple sites of fly-tipping.

19. I am unable to exhibit any photographic prints of this site, but I can say that as with the site at Hurstleigh Gardens, a temporary metal road had to be laid by Aherns prior to them being able to continue with the clearance. This was necessary from a Health and Safety perspective, because the land was very wet and boggy. I refer to my [Exhibit DKNL/10], invoice number 38611, raised by P.F. Ahern (London) Ltd, to describe the amount of rubbish to be cleared and disposed of by Aherns as 51.36 tonnes, and the cost of this operation to the London Borough of Redbrige was £23,976.58.

20. I can say that the total amount of fly-tipped rubbish to be cleared from the six sites that I have described, between 30<sup>th</sup> May 2017 and 6<sup>th</sup> 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.

Statement of Truth

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

Signed:   
Name: D Lucas  
Dated: 17/4/18

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

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WITNESS STATEMENT OF DAVID LUCAS

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**Exhibit DKNL/1**

IN THE HIGH COURT OF JUSTICE  
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CLAIM NUMBER:

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Defendants

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WITNESS STATEMENT OF DAVID LUCAS

---

**Exhibit DKNL/2**

IN THE HIGH COURT OF JUSTICE  
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Defendants

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WITNESS STATEMENT OF DAVID LUCAS

---

**Exhibit DKNL/3**

IN THE HIGH COURT OF JUSTICE  
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Defendants

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WITNESS STATEMENT OF DAVID LUCAS

---

**Exhibit DKNL/4**

IN THE HIGH COURT OF JUSTICE  
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WITNESS STATEMENT OF DAVID LUCAS

---

**Exhibit DKNL/5**

IN THE HIGH COURT OF JUSTICE  
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Defendants

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WITNESS STATEMENT OF DAVID LUCAS

---

**Exhibit DKNL/6**

IN THE HIGH COURT OF JUSTICE  
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Claimant

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**(1) Martin Stokes & 99 other named defendants**

**(101) Persons Unknown**

Defendants

---

WITNESS STATEMENT OF DAVID LUCAS

---

**Exhibit DKNL/7**



IN THE HIGH COURT OF JUSTICE  
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CLAIM NUMBER:

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The London Borough of Redbridge

Claimant

And

**(1) Martin Stokes & 99 other named defendants**

**(101) Persons Unknown**

Defendants

---

WITNESS STATEMENT OF DAVID LUCAS

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**Exhibit DKNL/8**

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 DAVID LUCAS

---

**Exhibit DKNL/9**

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 DAVID LUCAS

---

**Exhibit DKNL/10**

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 DAVID LUCAS

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
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IG1 1DD

REF: ATR/RC-017599

E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)

P: 0208 724 8379

Claimant  
K Wackett  
First  
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

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**WITNESS STATEMENT OF KEVIN WACKETT**

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I, Kevin Wackett, the Head of Parks & Open Spaces for (Vision) Redbridge Culture and Leisure, 210, Wash Lodge, Valentines Park, Cranbrook Road, Ilford IG1 4TG  
WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's application for an injunction against the above named Defendants and 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. On a date in July 2016, I was informed that unauthorised travellers, had gained access to Roding Valley Park, Woodford Green, South Woodford. Apparently, they had cut back trees and dug out soil bunds to gain entry. The incident was reported to the Redbridge Council, Community Police Team (RCPT). Roding Valley Park is a long linear park, which has various access points; this park is very popular within the local community, used by dog walkers, cyclists, commuters and families.
  3. I am aware that this was the second unlawful encampment on this site in recent years. I attended the site at 5pm that day in company with Police Officers from the (RCPT), to inspect the area for any damage and assess the requirement for security at this and other local sites. I am aware that the Borough Emergency Planning Team EPT visited the site the following day and conducted a welfare visit. The travellers were on this site for 4 days and were given access to and from the site by Coverdale K9, the security company that I had arranged to protect the site. These security measures were not to prevent the access to and from the site, but as a precaution to prevent them bringing on vehicles with fly-tip material such as building waste, which may be dumped on our land. The Council also erected a temporary CCTV camera to protect the site during this period.
  4. My staff and I visited the site each day of the incursion to monitor security and possible fly-tipping. I arranged concrete slabs to be installed on the park exits as the soil bunds/embankments had proved ineffective. The costs associated with unlawful encampments is substantial and includes: staff costs, (excluding costs for (RCPT),

Emergency Planning and Welfare visit) installation of concrete slabs, the security team, 2 officers (dog handlers), clear-up cost to remove fly-tips and rubbish dumped by the travellers.

5. I understand the invoices for these costs can be produced by Redbridge Council Officers. I am not aware of any threats or intimidation directed at my staff during the period of this incursion, however, our staff were not allowed on site without support from the (RCPT). The travellers left the site prior to any formal eviction process.
6. On a date in November 2016, I was informed that travellers, had gained access to Little Heath Green, Little Heath Lane, Ilford RM6 4NP by knocking down wooden bollards, which were in place to prevent vehicle access onto the green. This incident was reported to the Redbridge Community Police Team (RCPT). Little Heath Green is a small triangular shaped green area surrounded by residential streets and a main junction point onto the A12 road. It is a green space with a few benches used by local residents and students from nearby Redbridge College. I attended the site with (RCPT) officers to inspect the damage and access the situation; it was impractical to install security at the site as it is a green area surrounded by residential housing, where there is nothing really to protect. I am aware that the Emergency Planning Team visited the site the following day to conduct a welfare visit. The travellers remained on this site for 3 days, the Council served the appropriate eviction notices on the travellers but they left the site before any formal eviction procedure. I am not aware of any threats or intimidation to our staff, who were not allowed on site without support from the (RCPT). New bollards were installed to prevent further access at a cost to Redbridge Council.
7. On a date in April 2017, at 10pm, I was contacted by Simon James, Redbridge Senior Enforcement Officer. Apparently a local resident had informed the Council that travellers, had gained entry to the Old Woodford Town Football Club, Snakes Lane, Woodford, entry was gained by cutting off the locks and chains on the entry gates. Woodford Town Football

Club is a derelict site, which was previously the home of the old Woodford Town FC. It has been derelict for many years, the Council are in the process of leasing the site to a local sports club, and this is a secure site with no public access or use.

8. I attended the site the following day to inspect the damage and access the situation. I arranged for the Security Company Coverdale K9 to be on site. This was not to prevent their access to or from the site but to prevent the travellers bringing on vehicles with fly-tip material such as building waste which may be dumped on the site. This proved difficult due to alleged threats made against the security staff by the travellers. The Security Company were instructed to just be a presence on site, to reassure the local residents and not enter into confrontational situations. My staff and I attended the site each day during the incursion to review security and possible fly-tipping.
9. The Council served eviction notices but the travellers left prior to any formal eviction. There were Council costs including welfare visits, the security costs and fly tip removal costs I understand that the Council will produce invoices for these costs.
10. On a date in July 2017, I was contacted by Simon James, Senior Enforcement Officer, he informed me that a local resident had reported that travellers had gained access to Ray Park, by cutting off the locks and chains on the height barrier within the park.
11. I arranged for my Operations Officer to attend the site at 8.30pm, who confirmed that there were travellers on site. Ray Park, Snakes Lane East, Woodford IG8 7GL, is a large park consisting of a pavilion (James Leal Centre) walled garden, tennis courts, basketball courts, play area, adizone, football pitch and a café in the pavilion. It is a very popular park within the local community. I attended the site the following day to access the situation; I decided not to commission the



services of Coverdale K9 Ltd, as there was no immediate response available from the police to support the security officers. The Redbridge Enforcement Team undertook the welfare visits that day. The travellers were on this site for 7 days and were given access to and from the site. I attended the site on most days, the Council served all the eviction notices but the travellers left prior to any formal eviction.

12. I had various officers visit the site during this period to review security and fly-tip activity. The costs to the Council included the cost of: welfare visits, waste removal costs, repairs to the barriers and gates. I understand the Council will provide invoices. 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.
13. On a date in September 2017, I was informed that travellers had gained access to Wanstead Rugby Football Club, by cutting the locks of the height barrier and forcing entry. This was reported to the Council's Enforcement Team website by the sports club. Wanstead Rugby Football Club, Roding Lane North, Woodford IG8 8JY is a large sports club with a number of adult and junior rugby pitches. Apparently, travellers had previously gained entry to the site by cutting the perimeter fence some years earlier. I attended the site the following day and saw that the travellers had settled on the site. The land is leased to the Rugby Club so they commissioned the services of the Security Company, Coverdale K9 Ltd to protect their assets on site, (namely the pavilion which includes a licensed bar and a number of outbuildings housing their machinery for ground maintenance). The Redbridge Enforcement Team conducted the

welfare visits that day. The travellers were on site for 8 days and were given access to and from the site, I attended most days. The Council served the eviction notices and a Section 61 notice was served by the Police, the travellers left the site without the need for formal eviction.

14. I had various officers visit the site to review security and fly-tip activity. The Council costs included welfare visits, waste removal costs, due to contaminated waste being dumped on site. I understand the Council will produce invoices. The Rugby Club incurred further costs to repair the height barriers and gates as well as the loss of income from their bars and hire of the pitches.
15. On a date in September 2017, I was informed by our tractor driver that travellers had gained access to Clayhall Park. Apparently, a vehicle and caravan had been left on the cricket pitch, the keys were left in the vehicle and the occupants had left the park. The park was immediately locked down and the Council Enforcement Team and Police attended. Clayhall Park, Longwood Gardens, Ilford, is a large park consisting of a changing pavilion and café, tennis courts, basketball courts, play areas, outdoor gym, bowls club, football and cricket pitches, boxing club and dog care centre. Clayhall Park and the pavilion café are very popular with local residents and supported by the community.
16. I attended the site with our Operations Manager and Operations Officer, to access the situation. I saw that all the gates were secured and blocked; this was as a precaution as we expected further travellers to attempt entry. Some 2 hours later the occupants of the caravan requested to be let out. They were let out and informed that they were not welcome to park vehicles or set-up unlawful encampments within the Park.

17. On a date in September 2017, I was informed by the Councils Enforcement Team that a local resident had reported that travellers had gained access to Hurstleigh Gardens open space. Hurstleigh Gardens is a large open space in Clayhall Ilford. Travellers had gained entry by simply driving onto this open space, apparently these were the same travellers as those on Wanstead Rugby Club land.
18. I attended the site the following day and saw that the travellers had settled on the site, the Enforcement Team conducted welfare visits that day. The travellers were on this site for 5 days, they were given access to and from the site as there is no means to try and prevent or manage the access. I attended the site on most days. The Council later served all the eviction notices and obtained a Court Injunction to remove them; this was enforced by a bailiff's company. The Council incurred costs including welfare visits, waste removal costs due to contaminated waste being found dumped on site. I understand the Council can produce invoices. There were subsequent Council costs to install a bund to try and prevent further travellers.
19. On a date in September 2017, I was informed by the Council's Enforcement Team that a local resident had reported that travellers had gained access to Redbridge Recreation Ground, entry gained by cutting the locks and chains. Apparently these were the same travellers as those on Wanstead Rugby Club and Hurstleigh Gardens. Redbridge Recreation Ground is a small park with a play area and informal football pitch.
20. I attended the site the following day and saw that the travellers had settled on the site. The Enforcement Team commenced welfare visits that day. The travellers were on the site for 6 days and were given access to and from the site, as there was no means to try and prevent

their access. I attended on most days. The Council served all the eviction notices and obtained a Court Injunction to remove the travellers. The travellers left the site without the need for Enforcement Team action. I had various officers visit the site to review security and fly-tips. The Council incurred costs including waste removal, due to contaminated waste being dumped on site.

21. On a date in September 2017, I was informed by the Council's Enforcement Team that a local resident had reported that travellers had gained entry to Roding Valley Park via Elmcroft Avenue. Roding Valley Park is a long linear park and has various access points. Although not a main park, it is very popular with dog walkers, cyclists and commuters, the entrance by Elmcroft Avenue has a large multi sports games area. Apparently, these were the same travellers as those on Wanstead Rugby Club, Hurstleigh Gardens and Redbridge Recreation Ground.
22. I attended the site the following day and saw that the travellers had settled on the site, the Enforcement Team commenced welfare visits that day. The travellers were given access to and from the site as there was no means to try and prevent or manage their access. I attended the site on most days. The Council served all the eviction notices and the police served a Section 61 notice, and put a contingency plan in place to remove the travellers if necessary. The travellers vacated the site without the need for police intervention. I had various officers visit the site to review security and fly-tipping. The Council incurred costs associated with welfare visits and waste removal costs, due to contaminated waste being dumped on

the site. I understand the Council will be able to produce invoices. I am prepared to attend Court and give evidence if required

Statement of Truth

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

Signed:



Name:

KEVIN WACKETT

Date:

17/4/18

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

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WITNESS STATEMENT OF KEVIN WACKETT

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Fiona Alderman

Head of Legal Services

London Borough of Redbridge

Town Hall

128-142 High Road

Ilford Essex

IG1 1DD

REF: ATR/RC-017599

E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)

P: 0208 724 8379

253

Claimant  
E Rostami  
First  
Exhibits: Er/1  
Date:

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

Claimant

**-and-**

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

Defendants

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**WITNESS STATEMENT OF EIMAN ROSTAMI**

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I EIMAN ROSTAMI, am employed as a Planning Enforcement Officer, Regeneration, Property and Planning, London Borough of Redbridge, Redbridge Town Hall, 128-142 High Road, Ilford IG1 1DD 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. On 9th October 2017, my department was notified of a complaint from a member of the public regarding a yard full of rubbish, this had been discussed at Redbridge (inter-department work group) tasking meetings. The location of the site was the old Valentine Public House site situated at 27-37 Perth Road, Gants Hill, Ilford IG2 6BX. I attended the site with Ioannis Ifantidis of Environmental Health on two separate occasions, where it became apparent that there was a large amount of rubbish located on the premises, including refuse, timber, personal affects, metals and plastics, which would constitute a breach of planning regulation under Section 215 of the Town and Country Planning Act 1990.
3. I contacted the site developers (Mr Ronan Farrell), Tide Construction Ltd, 51A, Old Oak Common Lane, London W3 7DD regarding this matter. I sent the company an email/letter dated 7th November 2017, (exhibit ER/1) detailing the complaint and the action the company were required to take to remove and dispose of the rubbish and waste on site. I received a response from the company stating that they were dealing with the matter, being in contact with a number of companies to organise a clear up of the site.

**Statement of Truth**

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

Signed:  \_\_\_\_\_

Name: ELMAN DANIEL ROSTAMI

Date: 18/10/19



IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Redbridge

Claimant

and

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

Defendants

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WITNESS STATEMENT OF EIMAN ROSTAMI

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**EXHIBIT ER/1 – Letter 7 November 2017**

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 EIMAN ROSTAMI

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
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IG1 1DD

REF: ATR/RC-017599

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Claimant  
E PATTERSON  
First

Date:

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

Claimant

and

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

Defendants

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**WITNESS STATEMENT OF EMMA PATTISON**

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|| EMMA PATTISON, Service Manager for the Multi Agency Safeguarding Hub and Borough Emergency Social Work Services, WILL SAY AS FOLLOWS:

1. I am employed by the London Borough of Redbridge and I make this statement in support of the Claimant's application for an injunction against the above named defendants. The facts and information stated are not in my direct knowledge; they are true to the best of my knowledge and belief. The source of information for these facts is via e-

mail correspondence from the Redbridge Enforcement Team which detail requested and completed joint visits.

2. I am the Service Manager for the Multi Agency Safeguarding Hub (MASH) and the 4 Borough Emergency Duty Social Work Service which covers the four London Boroughs of Redbridge, Waltham Forest, Barking & Dagenham and Havering. I am responsible for managing all referrals and concerns regarding children and families in Redbridge and the operational social work service for the four Boroughs on evenings, weekends and Bank Holidays. I have been asked to detail visits by Redbridge Children's Services to traveller encampments and sites. 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.

26 April 2016 – Northview Traveller's Site

3. On 26<sup>th</sup> April 2016, the Duty Social Worker in the Child Protection and Assessment Service (CPAT) Team 3 attended Northview Travellers site, Forest Road Hainault IG6 3HW. This is a well-established, Council approved static site. We attended as there was a young couple with a 3 months old baby. Our role was to assess the safety and wellbeing of the baby and to ensure that no child protection concerns were evident. No action was taken bar the joint visit with Redbridge Housing and Adults Social Service Departments.

11 November 2016 – Royston Gardens

4. On 11<sup>th</sup> November 2016, information was received that there were travellers on a site in Royston Gardens, Ilford IG1 3SY. The Duty Social Worker in CPAT team 2 attended. No papers were served by CPAT. The purpose of the visit was for Children's Services to complete welfare checks of children present at the location and to determine whether additional support was required. No action was taken bar the joint visit with Redbridge Housing and Adults Social Service Departments.

20 July 2017 – Royston Gardens

5. On 20<sup>th</sup> July 2017, information was received that travellers were in Redbridge on the playing fields of Royston Gardens, Ilford IG1. Lisa Fage, the Duty Social Worker in CPAT team 2 attended. No papers were served by CPAT. Our role was to assess the safety and wellbeing of the 6 children on site and to ensure no child protection concerns were evident. No action was taken bar the joint visit with Redbridge Housing and Adults Social Service Departments.

#### 25 July 2017 Kearley and Tongue Sports Ground

6. On 25<sup>th</sup> July 2017, information was received that travellers were on the Kearley and Tongue Sports ground, playing fields, Royston Gardens, Ilford IG1. Lara McDonald, the Duty Social Worker in CPAT team 1 attended. No papers were served by CPAT. Children's Services attended to ensure the wellbeing of any minors at the unauthorised encampment at the time of the eviction.

#### 2 August 2017 Ray Lodge Park

7. On 2<sup>nd</sup> August 2017, Information was received that 15 vehicles and 15 caravans were on Ray Lodge Park, Snakes Lane East, Ilford. Ellens Rauney-Mumbre, the Duty Social Worker from CPAT team 3 attended. No papers were served. The purpose of the visit was for Children's Services to complete welfare checks of children present at the location and to determine whether additional

support was required. No action was taken bar the joint visit with Redbridge Housing and Adults Social Services Departments.

2 September 2017 Port of London Authority PLA Sports Ground

8. On 2<sup>nd</sup> September 2017, information was received that travellers were on the former Port of London Authority PLA Sports Ground. The Drive, Ilford IG1 3PS. The Duty Social Worker from CPAT team 2 attended. No papers were served by CPAT. There were 9 children on the site; no action was taken bar the joint visit with Redbridge Housing and Adults Social Service Departments.

21 September 2017 Redbridge Recreation Ground

9. On 21<sup>st</sup> September 2017, information was received that travellers were on the Redbridge Recreation Ground, Keswick Gardens, Ilford near the Beal High School. The Duty Social Worker from CPAT team 2 attended. No papers were served. We attended as there were possibly children on the site. No action was taken bar the joint visit with Redbridge Housing and Adults Social Service Departments.

28 September 2017 – Ray Lodge

10. On 28<sup>th</sup> September 2017, information was received that travellers were in Ray Lodge Park, Ilford. Ellie Knight, Duty Social Worker CPAT team attended in company with Redbridge Enforcement Officers to discuss with the travellers that they were unable to reside at the park. Children's Services purpose was to complete checks of children present at the location and to determine whether additional support was required. No action was taken bar the joint visit with Redbridge Housing and Adults Social Services Departments.

Statement of Truth

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

Signed: E. Pothick  
Name: Emma Pothick  
Date: 20/4/18



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

---

WITNESS STATEMENT OF EMMA PATTISON

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
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REF: ATR/RC-017599

E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)  
P: 0208 724 8379

Claimant  
J WOODWARD  
First  
Exhibits: JW1-4

Date:

**IN THE HIGH COURT OF JUSTICE**

**Claim Number:** \_\_\_\_\_

**QUEENS BENCH DIVISION**

**BETWEEN**

**THE LONDON BOROUGH OF REDBRIDGE**

**Claimant**

**and**

**(1) MARTIN STOKES & 99 OTHER NAMED DEFENDANTS**

**(101) PERSONS UNKNOWN**

**Defendants**

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**WITNESS STATEMENT JOANNE WOODWARD**

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I JOANNE WOODWARD, currently employed as Strategic Head of Planning and Building Control at The London Borough of Redbridge WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's claim for an injunction against the above named defendants. 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 attach to this statement **Exhibits JW/1 – JW/4**

- Exhibit JW1: Planning Policy for Traveller Sites (PPTS) (2015)

- Exhibit JW2: Redbridge Gypsy and Traveller Accommodation Assessment (2016)
  - Exhibit JW3: Redbridge Local Plan Policy Extracts
  - Exhibit JW4: List of trespassed sites and other sites included in the injunction (listed as lists A and B respectively)
3. In August 2015 the government issued its new Planning Policy for Traveller Sites (PPTS). This requires each local planning authority to set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area. This document is exhibited at **Exhibit LBR1**.
  4. In response to this publication, and as part of the evidence base to inform the review of the Redbridge Local Development Framework Core Strategy (LDF) adopted in 2008, the Council commissioned consultants Opinion Research Services (ORS) to undertake a borough wide gypsy and traveller assessment. The Redbridge Gypsy and Traveller Accommodation Assessment (2016) (GTAA) is attached as **Exhibit LBR2**. The document provides a robust assessment of current and future need for gypsy, traveller and travelling show-people accommodation in Redbridge, and identified a potential overall need for a total of 7 additional pitches for the period 2016-2031. The main reasons for the increase is that there are now more and older children living on the Northview Caravan Site on Forest Road compared to the previous GTAA in 2012.
  5. The assessment forms part of the evidence base for the Council's new Local Plan which was formally adopted by the Council on 15 March 2018, and the recommendations are reflected in Local Plan Policy LP8: 'Gypsies and Travellers'. The Planning Inspector's 'Report on the Examination of the Redbridge Local Plan 2015-2030' states that based on the 'Gypsy and Traveller Accommodation Assessment' update, and with modifications to ensure fair planning decisions that would facilitate the traditional and

nomadic way of life of travellers whilst respecting the interests of the settled community, Policy LP8 provides a basis for decisions on applications that come forward, in line with paragraph 11 of the government's Planning Policy for Traveller Sites. An extract of the adopted Local Plan Policy LP8 is attached at **Exhibit LBR3**.

6. Policy LP8 recognises the need identified in the GTAA assessment and supports the '*...maintenance and intensification of the Northview Caravan Site to provide up to 7 additional pitches to meet identified need over the plan period...*' The Northview Caravan Site, Forest Road IG6 3HW is a Council managed site that currently provides 16 pitches and has the capacity to accommodate the additional need. It is therefore considered that no additional sites are required for gypsy and traveller accommodation over the plan period. Policy LP8 also supports the development of additional accommodation elsewhere in the borough where the site and proposal:

- provides an appropriate layout in terms of pitches, amenity buildings, hard-standings and open spaces
- is not located in the Green Belt
- is located in Flood Zones1 and 2 and otherwise suitable for development
- has a suitable access road, is accessible from the public highway and has adequate parking
- is well related to existing communities and accessible to local services and facilities (shops, schools, healthcare and public transport)
- is sensitive to local character and surroundings.

7. It is the Council's view that in terms of adopted planning policy, the sites listed as **Exhibit LBR4** are unsuitable for gypsy and traveller accommodation as they do not meet the criteria set out in Policy LP8 'Gypsies and Travellers',

and proposals for gypsy and traveller accommodation on those sites would also be in conflict with other Redbridge Local Plan policies.

8. The list of sites in **Exhibit LBR4** includes sites that have been trespassed (Schedule A), and is divided into the following categories:

**Trespassed Sites**

- 1) Schools
- 2) Sports and recreation ground, playing fields and facilities
- 3) Superstores/retail parades/trading estates
- 4) Development Sites
- 5) Utilities

9. The list of sites also includes sites that the Council wishes to protect from trespassing (Schedule B), and these are divided into the following categories:

**Sites included in the injunction**

- 1) Schools
- 2) Sports and recreation ground, playing fields and facilities
- 3) Parks, amenity land and allotments
- 4) Libraries and youth centres and Non-operational facilities
- 5) Car parks
- 6) Refuse and recycling centres
- 7) Cemeteries and crematoriums
- 8) Superstores/retail parades/trading estates
- 9) Development sites
- 10) Agricultural and gravel

10. The land within these categories includes public and privately owned property. The following paragraphs set out in planning terms, and by category, why the sites in **Exhibit LBR4** are unsuitable for gypsy and traveller accommodation.

11. **Schools:** Schedule A of exhibit LBR4 sets out that Beal High School was trespassed by travellers in 2017. This was a breach in planning terms as the land surrounding the school is protected as open space under Local Plan Policy LP35 'Protecting and Enhancing Open Spaces'. This policy states that all uses and development in open space should support the purpose of open space and enhance the quality of and accessibility to open space. The use of this land for traveller and gypsy accommodation is therefore inappropriate and contrary to the Council's Local Plan.
12. Schools are key community infrastructure and an essential component of the Council's plans for growth in the borough. Local Plan Policy LP17 'Community Infrastructure', supports planned growth with appropriate new community infrastructure and the replacement or enhancement of existing facilities. This approach involves the expansion of existing schools as well meeting a requirement for 10 additional primary school forms of entry and 47 secondary school forms of entry over the life of the Plan period up to 2030 – according to the London Borough of Redbridge Infrastructure Delivery Plan 2015- 2030 February 2017). Land within existing school sites will be needed for the borough's expansion programme in response to planned growth in the Local Plan and should not be encroached by inappropriate uses, such as gypsy and traveller accommodation
13. Much of the land occupied by schools listed in Schedule B of LBR4 is also either designated as open space or green belt and is protected from inappropriate uses by Local Plan policies LP35 'Protecting and Enhancing Open Spaces' or LP34 'Green Belt and Metropolitan Open Land' respectively. Local Plan Policy LP8: 'Gypsies and Travellers', confirms that gypsy and traveller accommodation is not an appropriate use in green belt. This is consistent with paragraph 16 of the government's 'Planning Policy for Traveller Sites' (2015).

14. The Local Plan also seeks to protect and enhance the quality of all designated open space in the borough and any development should support and be ancillary to the purpose of open space. Uses that help achieve these aims include outdoor sports facilities, including school and private sports facilities and playing pitches, or proposals for new children's play space. Outside of open spaces that include designated pitches for gypsies and travellers, the use of open space on school sites or anywhere in the borough as pitches for gypsies and travellers does not support the Local Plan objectives.
15. School sites in general cannot provide the type of space that can be considered an appropriate layout in terms of pitches and amenity buildings for the gypsy and traveller communities. It is considered that gypsy and traveller accommodation on school sites set out in Schedules A and B of LBR4 will have an adverse impact on the efficient and effective operation of the school, a negative effect on the amenity of occupiers of adjoining land and an adverse effect on the visual amenity of the locality, contrary to Local Plan Policy LP8: 'Gypsies and Travellers'.
16. **Sports & Recreation Grounds, Playing Fields & Facilities:** The majority of sports and recreation grounds set out in Schedule A of LBR4 are also designated as open space or green belt. In fact many of the key sports facilities in the borough at Ashton Playing Fields, Fairlop Waters, Oakfield Sports Centre and Playing Fields, Forest Road Playing Fields, Hainault Recreation Ground, Hainault Forest Golf Course, Fords Sports Ground, and West Ham United Academy are located within areas of green belt. As stated above the use of green belt for gypsy and traveller accommodation is contrary to Local Plan policy, and the use of designated open space for this purpose does not support and is not ancillary to the purposes of open space, or help achieve Local Plan objectives of protecting and enhancing the quality of open spaces in the borough.

17. In accordance with the Local Plan policy for accommodating gypsies and travellers the use of open space at sports and recreation grounds for temporary or permanent use will only be permitted where a site would meet an identified need that could not be met in any other way. The need for additional pitches has been identified in the 'Redbridge Gypsy and Traveller Accommodation Assessment' (GTAA April 2016), and additional sites have already been allocated; no other additional need, which cannot be met in any other way, has been identified.
18. There have been a total of 20 breaches of planning legislation on 17 separate sports and recreation grounds/open spaces as a result of their unauthorised use as gypsy and traveller sites. These sites are set out in Schedule A of LBR4 and include designated open spaces and green belt land. Some of the open spaces such as George Green and Little Heath are within Conservation Areas and their open and undeveloped character contribute significantly to the amenity and historic value of the respective conservation areas. Other open space, such as that at Kearley and Tonge Sports Ground, is within a residential area where gypsy and traveller accommodation would be prejudicial to the ongoing use or enjoyment of that open space for sports and recreation, as well as the amenity of neighbours.
19. **Parks, Amenity Land and Allotments** are set out in Schedule B of LBR4. These areas include designated open spaces in almost all cases which are protected in the Local Plan as outlined in the categories above. Parks and amenity space also fulfil an important need where there are deficiencies in open space in the borough.
20. Parks such as Valentines Park, Seven Kings Park, Goodmayes Park, South Park, Clayhall Park and Loxford Park are all within areas of open space deficiency where no further loss would be acceptable. The Local Plan seek to encourage investment and adaptation of these spaces to meet their expected increased use arising from population growth in the borough. The



use of such open space for gypsy and traveller accommodation does not support the delivery of these Local Plan objectives.

21. With regard to allotment land the aim of Local Plan Policy LP36: 'Allotments' is to maintain and enhance and where possible increase the amount of land used for sustainable food growing and gardening by resisting development on allotments, unless they are no longer needed to meet local demand. There is a waiting list for allotment land in the borough, and the Council will resist any further loss and is committed to working with partners and local communities to identify sites with potential for local food growing and gardening projects. Considering these issues and objectives, and the protection of allotment land as open space under Local Plan Policy LP35: 'Protecting and Enhancing Open Spaces', it is unlikely that gypsy and traveller accommodation can be considered as an appropriate use for allotment land.
22. Libraries and Youth Centres and Non-operational facilities are set out in Schedule B of LBR4: it is unlikely, due to the nature of the facilities provided by these services, that the sites on which they are located will meet the criteria set out in Local Plan Policy LP8 'Gypsies and Travellers'. These services are generally located within an urban context, close to or within town centres and/or civic quarters, or near residential areas. These are not the appropriate environments for gypsy and traveller accommodation, and such sites would not provide an appropriate layout in terms of pitches, amenity buildings and open spaces, would not have adequate parking, and proposals for gypsy and traveller accommodation are unlikely to be sensitive to the local character and surroundings in which these public services are located.
23. Other services within this category, such as adult education centres, neighbourhood learning centres, war memorials & gardens, community centres and scout halls are equally unlikely to be located on sites that can

fulfil criteria in Local Plan Policy LP8 'Gypsies and Travellers', and would also be negatively impacted upon in terms of character by proposals for gypsy and traveller accommodation.

24. **Car Parks** are set out in Schedule B of LBR4: these sites are safeguarded under Local Plan Policy LP23 'Cycle and Car Parking', whereby proposals for a reduction in existing off-street parking must demonstrate that sufficient parking will remain in the area to serve local needs. Such policy objectives would be undermined by the use of car parks for gypsy and traveller accommodation.
25. The use of car parks for gypsy and traveller accommodation would also be detrimental to the amenity of car park users, occupiers of the site, and nearby occupiers; as the sites would not offer appropriate open space in accordance with Local Plan Policy LP8 'Gypsies and Travellers', as it would consist almost wholly of hard-standing.
26. **Refuse & Recycling Centres**: are set out in Schedule B of LBR4. These locations are safeguarded waste sites afforded protection for their existing use under the Mayor's London Plan (2016) and Local Plan Policy LP17 'Community Infrastructure' and the East London Joint Waste Development Plan (2012). The use of these sites as gypsy and traveller accommodation is contrary to the provisions of LP17, whereby the loss of community infrastructure, which includes waste sites, will only be supported where it is clearly demonstrated that there is no longer a need, that the building is no longer suitable, or the facilities are being re-provided elsewhere in the borough.
27. The use of such waste sites as gypsy and traveller accommodation would be unacceptable in regard to residential amenity of occupiers due to noise, disturbance, land contamination, and odour, contrary to Local Plan Policy LP24: 'Pollution', and LP8: 'Gypsies and Travellers'. A waste site would not provide for suitable amenity, pedestrian safety, and avoidance of noise and

environmental pollutants by occupiers, and its use as gypsy and traveller accommodation would undermine the ongoing operation of waste sites.

28. **Cemeteries & Crematoria** are set out in Schedule B of LBR4. These locations are afforded protection under the Mayor's London Plan (2016) and Local Plan Policy LP40: 'Burial Space', whereby the Council will protect existing land to be used for burial space. Their protection is necessitated by the need to ensure that different religious groups have sufficient burial space to meet their needs. Use of these sites as gypsy or traveller accommodation would be contrary to this policy and undermine the availability of burial space in suitable locations and access to associated facilities, as well as having an adverse effect on the amenity of the occupiers/users of the land and the visual amenity of the sites and the locality.
29. Many burial grounds serve as open spaces, some of which are designated as Sites of Importance for Nature Conservation (SINCs) or otherwise contribute to biodiversity, and are located within the green belt, and use of those sites as gypsy or traveller accommodation would represent a loss of open space, have an adverse impact on SINCs, or would represent inappropriate development in the green belt.
30. **Superstores/retail parades/trading estates**: Schedule A of LBR4 sets out a total of 16 breaches of planning legislation on 4 separate sites as a result of their unauthorised use as gypsy and traveller sites. The use of these sites as gypsy and traveller accommodation is inappropriate due to the provisions of Local Plan Policy LP10 'Managing Town Centres and Retail Uses', whereby the Council will seek to maintain a minimum of primary and secondary retail frontages and key retail parades for A1 use class retail units. Use of these sites (which in practice would be the parking areas or other curtilage of retail buildings) as gypsy and traveller accommodation would undermine these retail uses and their ability to operate (in regard to parking and loading), and would have an adverse impact on the amenity of nearby occupiers.

Likewise, the operational requirements of supermarkets and retail parades in regard to parking and loading would have an adverse impact on the amenity of occupiers of any gypsy and traveller accommodation on such sites.

31. The use of superstores and retail parades for gypsy and traveller accommodation would also be inappropriate due to the provisions of Policy LP8 'Gypsies and Travellers' as the sites would not have an appropriate layout, and would be likely to have an adverse effect on the visual amenity of the locality due to the site's location where caravan accommodation would not be compatible with the urban character of the sites. Such a use would also be an inefficient use of town centre land in regard to Policy LP2 'Delivering Housing Growth', and would undermine the delivery of housing, commercial, or mixed use development at the superstores and retail parades listed.
32. Schedule A of LBR4 refers to the incident of the trespassing of the Woodford Trading Estate at Southend Road in September 2017. The use of such sites for gypsy and traveller accommodation is inappropriate due to the provisions of Policy LP14 'Stimulating Business and the Local Economy' whereby the Council seeks to protect existing employment uses and facilities by directing industrial activity to the Preferred Industrial Location of Southend Road Business Park, which includes Woodford Trading Estate. The ongoing use of such designated sites for industrial purposes would be prejudiced by unauthorised use as gypsy and traveller accommodation, and industrial processes and traffic from the industrial operations would be detrimental to their amenity as gypsy and traveller accommodation.
33. **Development Sites:** Schedule A of LBR4 refers to a total of 11 breaches of planning legislation on 10 separate sites as a result of their unauthorised use as gypsy and traveller sites. These sites are either under development or have planning permission for development, such as Recorder House, High

Road, Ilford; and/or allocated in the Local Plan for development, such as the Former Shannon Centre at Seven Kings. Some are currently vacant and have a planning application under consideration, such as the former Valentines Pub at Gants Hill, or are listed buildings that are under redevelopment to save the character of the building and find a use for it, such as the Former Doctor Johnson pub.

34. Due to the status of these and other development sites in the borough, they may be construction sites, or cleared for construction, they will not be suitable for gypsy and traveller accommodation as they are unlikely to fulfil criteria in Local Plan Policy LP8: 'Gypsies and Travellers', with regard to site layout for pitches, and their effect on the character of the surrounding area, as many development sites will be in built up areas, or in residential areas where local character would be negatively affected. Where development sites have planning permission for a new development, their use for gypsy and traveller accommodation would add extra cost in preparing sites for redevelopment and create additional hindrance to sites coming forward for development, contributing negatively to meeting the significant housing requirements set out in the Local Plan.
35. **Utilities:** Schedule A of LBR 4 refers to the Essex & Suffolk Water Site in Roding Lane South which was trespassed in September 2017. This represents a breach of Local Plan Policy LP34: 'Green Belt and Metropolitan Open Land' as the site is located within green belt. The policy commits the Council to protecting green belt in the borough and to ensuring that green land retains its openness. The use of green belt land by travellers and gypsies for accommodation also contravenes Policy LP8 'Gypsies and Travellers' which states that gypsy and traveller sites should not be located in green belt unless there are very special circumstances. It is also likely that using the land for such accommodation would hinder the operation of the Essex and Suffolk utility.

36. **Agricultural and gravel** sites are set out in Schedule B of LBR4. These sites are not suitable for gypsy and traveller accommodation as they all lie within the green belt. Local Plan Policy LP8: 'Gypsies and Travellers' and the government planning policy document 'Planning Policy for Traveller Sites' (PPTS) (August 2015) both state that gypsy and traveller accommodation is not an appropriate use in green belt.
37. Agriculture and gravel extraction are both appropriate uses in green belt and have continued in the borough over many decades. Many of the sites in this category, such as those at Aldborough Hatch Farm and Hainault Farm are sites in areas where minerals extraction have and are now planned to continue, with operations likely to begin in the near future, and the use of the site for traveller and gypsy accommodation would hinder operations. Hainault Road is also an important access road for freight related to this activity and should not be blocked by gypsy and traveller accommodation. Much of Fairlop Quarry has already undergone extraction processes and no longer have gravel resources, but is now used for recreational purposes, an appropriate use in green belt.
38. I have been advised that sites in Schedule A have been targeted in the past by unauthorised encampments and it is likely, based on the history of encampments in the borough, that they will be targeted again. With respect of sites in Schedule B, I have been advised these are potential sites at risk of unauthorised encroachment.

39. For the above reasons, it is my view that the sites in Schedules A and B of Exhibit JW4 are inappropriate from a planning perspective for use as gypsy and traveller accommodation sites.

40. It is for this reason that I say it is appropriate for an injunction under s.187B of the Town and Country Planning Act 1990 to be imposed to restrain and apprehend any future breach of planning control at these sites by the named defendants, and other persons unknown.

Statement of Truth

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

Signed:  \_\_\_\_\_

Name: \_\_Joanne Woodward

Date: \_\_20<sup>th</sup> April 2018

IN THE HIGH COURT OF JUSTICE  
QUEENS BENCH DIVISION  
CLAIM NUMBER:  
BETWEEN

The London Borough of Redbridge  
Claimant

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

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WITNESS STATEMENT OF JOANNE WOODWARD

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
Ilford Essex  
IG1 1DD

REF: ATR/RC-017599

E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)  
P: 0208 724 8379



Claimant  
I Ifantidis  
First  
Exhibits: IF/1  
Dated: \_\_\_\_\_

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

**Claimant**

**and**

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

**Defendants**

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**WITNESS STATEMENT OF IOANNIS IFANTIDIS**

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I Ioannis Ifantidis, of London Borough of Redbridge, 10th Floor, Lynton House

255-259 High Road, Ilford IG1 1NY WILL SAY AS FOLLOWS:

1. I have been employed by the Council since October 2007. I am a qualified Environmental Health Officer and I hold full membership of the Chartered Institute of Environmental Health.
2. I am currently employed as an Environmental Health Practitioner within the Civic Pride Service. This post is responsible for the Council's environmental health functions.

3. My current duties include the Council's Public Protection Service, fulfilling responsibilities under environmental health legislation. In more detail I deal with statutory nuisances, drainage provision, and pollution to air, land and water, communicable and infectious diseases, contaminated land, food hygiene and food standards and health & safety at work.
4. Proper sanitation is required to prevent the spread of a wide range of bacterial and viral diseases and intestinal parasites. Defecation on land without subsequent appropriate treatment does not constitute proper sanitation.
5. Disease-causing organisms that can live in the human gut are spread from person to person when they are excreted in the faeces, and can be transmitted by direct contact with faeces, or objects in the environment that have been contaminated by faeces. This is the phenomenon of faecal-oral route infection well known in public health disease control. Typically transmission is by infective organisms reaching the mouth from contaminated hands or from food or objects contaminated by dirty hands.
6. Contamination of surface waters, food and drinking water supplies is a risk with uncontrolled presence of untreated human faeces on land.
7. Diseases that are recognised as being spread in this way include viral and bacterial gastro-enteritis; hepatitis; cholera; dysentery; shigellosis; typhoid; Giardiasis and intestinal worm infections. Many such diseases are potentially fatal.
8. Contact with faeces can cause skin infections particularly when there are minor cuts or abrasions. Infections could in the worst cases lead to septicaemia and death. Eye infections through contact with mucous

membranes (for example conjunctivitis) are a widely recognised risk of faecal contamination.

9. During my visit to Valentines Public House, Perth Road, Ilford IG2 6BX on the 20<sup>th</sup> 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. I confirm that I consider the accumulation of untreated human faeces to be prejudicial to human health in public health terms.
10. Accumulation of building waste, household waste, food stuffs and pet food can give rise to unpleasant odours and flies. Such waste can attract rats and mice as it provides both a food source and harbourage.
11. Rats and mice pose a risk to public health as they carry and can transmit diseases that are hazardous to both humans and animals. Rats and mice can also cause damage to homes, gardens sheds and garages. They eat and contaminate all types of food and can cause diseases such as Weil's disease, e-coli and salmonella
12. There is now produced [Exhibit II/01] consisting of 1 photograph (aerial) showing accumulations of waste left behind by those forming the unauthorised encampments which are the subject of this claim for an injunction. I confirm that accumulations of waste contained in the photograph to be prejudicial to human health in public health terms.


Statement of Truth

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

injunction. I confirm that accumulations of waste contained in the photograph to be prejudicial to human health in public health terms.

Statement of Truth

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

Signed:  \_\_\_\_\_

Name: IOANNIS I. FANTIDIS

Date: 23-04-2018.

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 IOANNIS IFANTIDIS

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
Ilford Essex  
IG1 1DD

REF: ATR/RC-017599

E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)  
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Claimant  
L JACOBS  
1<sup>st</sup> Statement  
Exhibits LJ/1-LJ/2  
Dated: \_\_\_\_\_

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

**Claimant**

**and**

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

**Defendants**

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**WITNESS STATEMENT OF LINDSEY JACOBS**

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I LINDSEY JACOBS, Operations Manager of Direct Wholesale foods Ltd, (DWF) Unit 12, Woodford Trading Estate, Southend Road, Woodford Green, Essex IG8 8HF 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 the Operations Manager of Direct Wholesale foods Ltd, (DWF) Unit 12, Woodford Trading Estate, Southend Road, Woodford Green, Essex IG8 8HF. The Company is an Ice Cream & Frozen Food Distributor. We run the Company from a self-contained building on the Woodford Trading Estate and have been on this site for 10 years, we are a small to medium business employing on average 25 – 30 employees. I can give evidence of two traveller incursions witnessed on 19<sup>th</sup> October 2017 & 29<sup>th</sup> January 2018.

3. The first incursion on 19<sup>th</sup> October 2017, was by Riverside House, which is another business/office building on the Woodford Trading Estate, this building and surrounding car parking area is alongside the river Roding and at the end of the

road up from the estate entrance. This building Riverside House is a short distance from our building. I believe the premises were empty at the time of the incursion. There were about 2-3 vehicles and caravans on site at the location; they had forced entry by removing the security padlock and the barrier, and then started maintaining their own locked gate entry & exit system to Riverside House.

4. There was considerable fly tipping by them at the site. We pass this location to get to our building, as there is only one entrance & exit road onto the large Woodford Trading Estate.
5. The other incursion was on 29<sup>th</sup> January 2018, On this occasion the travellers had removed a parking post and destroyed a section of our boundary fence in order to enter a large car park area of the premises next door to our site at unit 12. This area of their second incursion is not part of the Woodford Trading Estate but another trading/factory estate alongside us.




6. The travellers again erected their own gated entry system; they posted notices onto the gates. I took photos of the notices which I produce shown as [Exhibit U/1-U/2]. The travellers had to drive over our small car park and a grass verge to access this other site. The travellers stayed weeks on these sites, and there was considerable fly tipping. My staff and customers were extremely concerned that travellers were on site and very close to our building. We as a business are very conscious of the security of our business premises and take seriously the safety of our staff and the security of their vehicles parked close by. Our customers had similar concerns, they were anxious when leaving their vehicles and transporting goods. We have not increased our security costs as such as the company are fully aware of security and protecting our valuable assets. However, as a company we are beginning to have reservations regarding the security and safety of the Woodford Trading Estate. Twice now in the space of less than 3 months travellers have been able to access the site, damaging property and depositing vast amounts of industrial waste and

rubbish and staying on the sites illegally for weeks. This indicates there is not enough security around the estate to protect the private Trading Estate, the Council land and footpaths. As a Company we will monitor future actions and protection plans with considerable interest. This will form part of our Company's future business strategy.

Statement of Truth

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

  
\_\_\_\_\_  
LINSEY JACOBS  
\_\_\_\_\_  
20 Dec 2018.

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 LINDSEY JACOBS

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
Ilford Essex  
IG1 1DD

REF: ATR/RC-017599

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P: 0208 724 8379

Claimant  
D KAUR  
1<sup>st</sup> Statement  
Exhibits: n/a

Dated: \_\_\_\_\_

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

**Claimant**

**and**

**(1) Martin Stokes & 99 other named Defendants**

**(101) Persons Unknown**

**Defendants**

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**WITNESS STATEMENT OF DARSHAN KAUR**

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I Darshan Kaur, Deputy Head Teacher (an, during Sept/Oct 2017 Acting Head Teacher) of Cranbrook Primary School, The Drive, Ilford IG1 3PS 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. The school is a large culturally diverse community school within the London Borough of Redbridge in Essex. We opened in September 2007; initially with 4 classes and have since expanded at a fast rate. We now have 29 classes across the school (5 in year 6) and a large nursery with pupils between the ages of 3 – 11 years. The school is a valued community asset and well respected by the local community and residents. The main school is a large building with a playground alongside, which is next to the site that was occupied by the travellers.

2. We have a large car park which has no entry barriers, which is also shared by the Children's Centre and The Frenford Youth and Sports Club at 142 The Drive, Ilford. On the morning of Wednesday 20<sup>th</sup> September 2017, I saw that at least 4 caravans and several vehicles were parked on the land next to our school. The caretaker and I went over to this area to ascertain the situation. On the site with the travellers were a policeman and the land owners. I spoke with the land owners and was told that the trespassers had broken into the site and occupied the land during the previous night. I also contacted the police and the Local Authority to report the matter and obtain their advice. I was advised to monitor the situation.
  
3. At school play time that same day it was reported to me that children from the travellers site had been throwing stones into the school

playground during Key Stage 1 playtime. I took immediate action and cordoned off part of the playground, additional sheeting was placed along the fence and coned off area. I enlisted and tasked additional midday and senior staff to patrol the area to ensure that the children were not put at any risk during their lunchtimes.

4. I contacted the Local Authority again and was put in touch with the Redbridge Enforcement Team. Continuing on from Wednesday 20<sup>th</sup> September 2017, through to Friday 22<sup>nd</sup> September 2017, I ensured that the senior leadership team carried out a high level of supervision, monitoring the cordoned off area during the children's playtimes and lunchtimes. Additional members of the senior leadership team were also on duty before and after school. This action continued until the travellers left the site, which I was informed was on Saturday 23<sup>rd</sup> September 2017.
5. This monitoring and safeguarding put an additional burden on my staff during the school day, when they would have been involved in the management and running of our school. During the time that the travellers were occupying the site I kept in constant contact with the police, Local Authority and the Redbridge Enforcement Team. Parents were notified of the action taken by the school and our liaison with the various agencies. Many parents had contacted the school expressing their concern over the travellers site being next to the school. I pacified and

Claimant  
D KAUR  
1<sup>st</sup> Statement  
Exhibits: n/a

Dated: \_\_\_\_\_

reassured these parents informing them of the plans put in place and the high presence of the senior leadership team at the school gates at the start and end of each day.

6. My primary concern was for the safety of the children in the school. This was ensured by increasing the security within the school perimeter, although this took staff away from their school commitments. The encampment by trespassers next to our school had a detrimental effect on the children, they were not able to go about their school day as usual, and were restricted at playtime, lunchtimes and for their PE lessons. To my knowledge no damage was caused to our property and no rubbish was dumped on our site.

Statement of Truth

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

Signed: Darshan Kaur

Name: DARSHAN KAUR

Date: 19/4/18

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

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WITNESS STATEMENT DARSHAN KAUR

---

Fiona Alderman  
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Claimant  
S S SANGER  
FIRST

Exhibits:

Date:

**IN THE HIGH COURT OF JUSTICE**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

**Claimant**

**and**

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

**Defendants**

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**WITNESS STATEMENT OF SARBJIT SINGH SANGER**

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I Sarbjit Singh Sanger, Manager/Partner of Delco Developers, Kilroy House, 400, Roding Lane South, Woodford IG8 8EY 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. My partnership company is a Property Management, Contractor, Building and Property Development Company. In 2012 my Company obtained land situated at 30-32, Wanstead High Street, the location of this site is off Wanstead High Street, near the junction with Woodbine Place, backing onto the Recreation Ground. At one time I believe many years ago there was property on site, however, when we acquired the land it was and still is open land, fenced off, gated and padlocked. The site is still open land, fenced off and secured. We have acquired the land to eventually develop the site.

3. On Saturday 21<sup>st</sup> October 2017, my family and I were away from home attending a wedding reception, I received a phone call from associates who informed me that travellers had entered onto the Wanstead High Street site and set up an illegal encampment. I could not attend the site at that time, I phoned the police who informed me that they apparently could not do anything and that it was a civil matter. We were still at the wedding reception on the Sunday so again could not attend the site or do anything at that stage. However, on the Monday, I contacted my Solicitor to discuss the issues; he informed me that the police could serve a notice on the travellers if the circumstances warranted it. He advised me that for the company to take civil action to evict the travellers, the

procedure would be costly and would not be immediate and they may be on site for ages.

4. I phoned the police again and had contact with an officer who was dealing with the matter. I was told they would be serving a notice on the travellers to get them off the site within a few days. I did visit the site on that Monday to speak with the travellers and discuss the problem. I wanted to see if I could persuade them to leave our site. When I arrived at the site I saw that they had put their own padlock on the gate. I spoke to the occupants, they brought my attention to a notice they had affixed on our gate. I do not recall the precise wording, but remember that it contained words to the effect that I could not get them off our land without a court order or injunction and told me I can't do anything.

5. 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. The travellers would not allow me onto our site, some of them came out and spoke with me, and they were intimidating and threatening. As I was there a van pulled up full of rubbish, I stood in front of the gate and would not let it enter, the driver said he was there to tow off a caravan, I did not believe him. He did drive off eventually.

6. I visited the site again on other days during the first part of that week. The police had attended and served a notice on the travellers and they left the site midweek. After they left we secured the site again by putting a vehicle in front of the access point. Vast amount of rubbish and been dumped on this site by the travellers during their unlawful encampment. I have already had a container load removed, and the cost to date is £7,000.00.

7. In 2016, we obtained another plot of land the site of the old Dr Johnston Public House situated at 175 Longwood Gardens, Barkingside, Ilford IG5. The land was purchased with the intention to re-develop the site at some stage. We have since been granted planning permission to develop. Approval has been granted for the old pub building to be converted into a local Co-op shop and residential flats. This site was being controlled and managed by a company associate Mr Dalbir Singh. In August 2017, travellers broke the fence and gate and entered the site. I did not attend this site so have no personal knowledge as I did not witness the incursion. However, I have knowledge of how the situation was dealt with by the company partner who relayed the information to me.

8. 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.

9. Our company has other land and premises purchased for development situated at 400, Roding Lane South, Woodford Green IG8 8EY and Ley Street House, 497-499, Ley Street, Ilford IG2 7FA. We would like these plots to be included along with our other sites named in any High Court injunction obtained on behalf of The London Borough of Redbridge as it appears that land which is awaiting development is being targeted by these unlawful sites.

Statement of Truth

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

Signed: 

Name: 20 APRIL 2018

Dated: SARJIT SINGH SANGER.

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 SARJIT SINGH SANGER

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
Ilford Essex  
IG1 1DD

REF: ATR/RC-017599

E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)  
P: 0208 724 8379

Claimant  
M Baker  
First  
Date:

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

**Claimant**

**and**

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

**Defendants**

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**WITNESS STATEMENT OF MARK BAKER**

---

I Mark Baker, Facilities Manager for the estate working for Jones Lang LaSalle ("JLL") Allen House, Station Road, Sawbridgeworth CM21 9JX make this statement in support of the Claimant's application for an injunction against the above named defendants and WILL SAY AS FOLLOWS:

1. 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. JLL are Managing Agents acting on behalf of the land owner of the address at Woodford Trading Estate, Southend Road, Woodford Green IG8 8HF. This site consists of an Industrial Estate comprising of 22 units. The estate is open 7 days a week and the work units are accessible 24/7. There is a manual operated barrier to the rear of the estate which is lowered and the locked of an evening with a padlock and chain, this offers protection to units 6 – 12 on the estate and unit 14, Riverside House.

2. On Wednesday 18<sup>th</sup> October 2017, travellers took-up unlawful occupation on the 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 able to access the CCTV system and view images on my mobile device of the travellers occupation of the site, which I reviewed 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 informed that there were a total of 6 caravans, 4 trucks and assorted vehicles on the 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 18<sup>th</sup> October 2017 until the 24<sup>th</sup> October 2017.



3. I arranged for additional security on site, (dog handler) security officers, whilst we arranged for concrete blocks to be placed on the site to offer further security to secure the car park, which incurred additional costs. On the 19<sup>th</sup> October 2017, the land owner instructed bailiffs to act on their behalf, to which the travellers then claimed squatter's rights due to the vacant building that the car park served. This then progressed to further proceeding to seek an order for possession.

4. On the 24<sup>th</sup> October 2017, the travellers left the site of their own accord. I am of the opinion, however, that they only vacated the site as they had exceeded all available space to dump their rubbish and fly-tip. The travellers had dumped all types of waste on the site, including: trade, household, hazardous waste and human excrement.. I have no knowledge of any threats or intimidation made towards my staff, security officers or any other persons during their stay.

5. I have now left JLL and no longer have access to their invoices, I can confirm, however, that the cost of cleaning-up and disposing of the fly-tipped waste was approximately £40,000.00, a further £5,000.00 was incurred to cover repair and replace fencing and staff and operation costs and a cost of approximately £2,000-£3,000 for additional security dog units. I have now left the company so I do not have access to invoices or documents to confirm the exact costs. I understand these can be produced by other staff

Statement of Truth

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

Signed: 

Name: Mark Baker

Date: 13/4/18



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

---

WITNESS STATEMENT MARK BAKER

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
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REF: ATR/RC-017599

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P: 0208 724 8379

Claimant  
C ALISON  
FIRST

Dated: \_\_\_\_\_

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

**Claimant**

**and**

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

**Defendants**

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**WITNESS STATEMENT OF CHRISTOPHER ALISON**

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I CHRISTOPHER ALISON, facilities manager with Jones Lang LaSalle (JLL) Managing Agents, Allen House, Station Road, CM21 9JX 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 Jones Lang LaSalle (JLL) Managing Agents, Allen House, Station Road, Sawbridgeworth CM21 9JX as a Facilities Manager. My responsibilities within the company include overseeing Health & Safety, Budgets and Operational matters on sites. I have been with the Company since 2001; however, I only took up my present post on 15<sup>th</sup> January 2018. I have responsibility for Woodford Trading Estate, Southend Road, Woodford Green, Essex IG8 8HF. This is a large Industrial Trading Park in East London which our Company has managed since 2001. The site comprises company parking areas, waste land, grass areas, various tenants including trade counters, and these include small medium and large businesses covering a variety of trades and companies.
  
3. On Sunday 27<sup>th</sup> January 2018, at around 8pm, the company were informed that travellers had entered the Woodford Trading Estate. I was informed that evening, initially by a phone call and later an email from the Security Company who were on site. I understand that extra security officers and the police had attended that night. The travellers gained entry by freely driving onto and through our site. They drove around the estate to an area by Direct Wholesale Foods Ltd, unit 12.

4. They cut down a steel bollard a section of our perimeter fencing and the trees behind it. This gave them access onto the neighbouring trading estate. There were approx. 15 vehicles and caravans on the neighbouring estate site. Following the incident, I visited the site daily for about a week until the trespassers were removed by the Bailiffs executing a Court Order instigated by the neighbouring site. I am told they stayed for about 3 days.
5. Racial abuse was directed to our security staff officers, who also had bottles thrown at them. A large pile of wood was left on the neighbouring site. We had a number of complaints from businesses on our site. The travellers had to drive through the Woodbridge Trading Estate to get to the neighbouring site where they were encamped. They would drive through very fast, swearing and being generally abusive to persons, especially dog handlers and security staff.
6. We incurred extra security costs from K9 security from 30<sup>th</sup> January 2018 until 22<sup>d</sup> February 2018. The cost comprised 24 days of 24 hours at a cost of £10,730.88. We also installed heavy duty fences, this action was to try and prevent further incursions.

Statement of Truth

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

Signed:  \_\_\_\_\_

Name: C. ALISON

Date: 20/04/18

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

---

WITNESS STATEMENT CHRISTOPHER ALISON

---

Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
Ilford Essex  
IG1 1DD

REF: ATR/RC-017599

E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)  
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Claimant  
RJ Youd  
First  
DATE:

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN:**

**THE LONDON BOROUGH OF REDBRIDGE**

Claimant

**-and-**

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

Defendants

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**WITNESS STATEMENT OF ROBERT JOHN YOUD**

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I ROBERT JOHN YOUD the Chairman of Bancroft Rugby Football Club ("the Club"), and can be contacted at the Club address Buckhurst Way, Buckhurst Hill, Essex IG8 6JD WILL SAY AS FOLLOWS:

1. I make this witness 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 a volunteer at the Club as are most of the team and staff. I arrived at Bancroft RFC on the morning of Friday 28<sup>th</sup> July 2017 to supervise our weekly

Brewery delivery, I did not notice anything amiss as I unlocked the clubhouse and started my normal work and duties. The Club's part time Manager and designated premises supervisor for our premises licence, Mr Terry Hughes, arrived on site at approximately 09.45am that morning. He informed me that there were caravans camping on the club premises on our training field. I told Terry to wait and observe from a distance, as there were only the two of us on site at that time. I went outside and saw a line of white vans towing caravans. The caravans were queuing across the Club 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, who was a traveller. 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.

3. I re-joined my colleague on the other side of the car park where we discussed an option of closing and locking the gate, but saw that the traveller group were ensuring that the gate remained open, one of the group threatened that the gate would be taken down if closed. A group of adult male travellers later approached me and asked where I wanted them to camp. I told them that I did not want them to camp anywhere on our premises and again asked them to leave. They stated that if they left the training area the only place they would move to would be our First Team pitch. I told the men again that they should leave, their response was *"come back with a Court Order"*. I contacted our Solicitor and Club Secretary Mr Stephen Thirsk and informed him of the traveller incursion.
4. I contacted the police again, they informed me that the call had been passed to the Met Police to respond. A while later a single police vehicle arrived, I was informed by the officers that as the travellers were on the land there was nothing they could do and they did not want to initiate a confrontation, they left shortly after. I remained on site organising 24-hour security to protect our clubhouse and premises, this took the form of two officers one of which was a dog unit. No damage was caused by the travellers gaining access to our site as the gates were open expecting our regular brewery delivery.
5. In addition to being the Club Chairman I am also one of the Club Safeguarding Officers. In consultation with other committee member colleagues we decided to close the premises with immediate effect. This had a number of financial and business impacts. We run a significant Junior Rugby presence on Sunday mornings with young people aged between 7 – 14 years old training or playing competitive matches, this date was one of our early season weekends and we

expected a strong turnout. We cancelled the event, I could not safely allow the event to continue under child safeguard guidelines, as we had approximately forty plus adults on site who we could not identify and who apparently had no fixed abode.

6. We had a booking for a 30<sup>th</sup> 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. The Club was required to reimburse monies. It was decided that immediate action was required to evict the travellers and proceedings were instigated in the High Court, any time delay in eviction had the potential to ruin the Club financially.

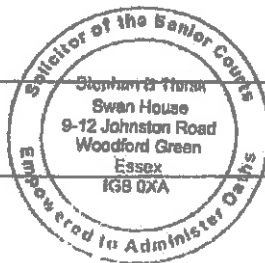
**Statement of Truth**

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

Signed: P B Thirk - Solicitor for RCT Ltd

Name: \_\_\_\_\_

Date: 13-04-2018



**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 ROBERT JOHN YOUD**

---

**Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
Ilford Essex  
IG1 1DD**

**REF: ATR/RC-017599**

**E: [adam.rulewski@bdtlegal.org.uk](mailto:adam.rulewski@bdtlegal.org.uk)  
P: 0208 724 8379**

Claimant  
R Farrell  
First  
Exhibits RF/1 to RF/7  
Date:

**IN THE HIGH COURT OF JUSTICE**

**CLAIM NUMBER:**

**QUEENS BENCH DIVISION**

**BETWEEN**

**The London Borough of Redbridge**

**Claimant**

**and**

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

**Defendants**

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**WITNESS STATEMENT OF RONAN FARRELL**

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I RONAN FARRELL Design Manager of Tide Construction Limited, fifth floor, 62-64, Baker Street, London W1U 7DF make this statement in support of the Claimant's application for an injunction against the above named Defendants and WILL SAY AS FOLLOWS:

1. 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 hold the qualification of RIBA. Tide Construction Ltd is a developer and contractor company. The company was due to commence work on a site 27-

37, Perth Road, Gants Hill, Ilford London IG2 6BX. At present this application is being processed by the Local Authority Planning Department. It is anticipated that development work will commence in the Autumn of 2018. This was the site of the Valentine Public House, which had been decommissioned and boarded-up.

3. Travellers arrived on this site on 25<sup>th</sup> August 2017 and set-up an unlawful encampment. The lock on the gate had been cut and then re-locked by the unlawful occupants. The Travellers remained on site for 4 weeks, I have no knowledge of any anti-social behaviour or intimidation by the travellers, they just refused to move off the site. No additional security was put in place. The travellers left the site on 21<sup>st</sup> September 2017, this was due to the fact that they had been informed that they had a day to move, or they'd be blocked in due to ongoing works.
4. After they had left the site damage was found to the boarding and the fabric of the old pub buildings. A huge fly tip was left at the site, covering a vast area, various industrial and builder's waste. The cost of site clearance is £19,664.88, I produce an invoice from McGrath Bros Ltd [Exhibit RF/1] there was additional costs to repair damage and install concrete barriers after they had left to prevent a

re-occurrence. I produce copies of photographs taken at this site  
[exhibits RF/2, RF/3, RF/4, RF/6,RF/7]

Statement of Truth

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

Signed: 

Name: Ronan Farrell

Date: 09.04.18

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

---

WITNESS STATEMENT OF RONAN FARRELL

---



Fiona Alderman  
Head of Legal Services  
London Borough of Redbridge  
Town Hall  
128-142 High Road  
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P: 0208 724 8379

Claimant  
M J Calvert  
First  
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 MICHAEL JOHN CALVERT**

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I Michael John Calvert, president of Wanstead Rugby Football Club (RFC) Roding Lane North, South Woodford IG8 8JY make this statement in support of the Claimant's application for an injunction against the above named Defendants AND WILL SAY AS FOLLOWS:

1. 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 the President of the Wanstead (RFC) (the "Club"). The Club has a long local history and has developed strong community connections within East London. It was founded in 1892 as Leytonstone RFC, moving in the 1920's to a

site in Wanstead, the club has continued ever since to play Rugby within what is now the London Borough of Redbridge. The Club is currently playing in the London North East League, based at its current ground and clubhouse situated on Redbridge Council Land off Roding Lane North. The Club holds a long lease on the whole of the ground which grants a Lease until 2045. The Landlord is The London Borough of Redbridge.. Our Clubhouse, which was funded and built by the Club, will revert to the Borough Council at the end of the Lease, unless it is extended. We have a purpose built, two story clubhouse, with a total of five changing rooms, a physio room, bar store and showers on the ground floor. On the first floor we have a large clubroom with bar, a Members bar and a kitchen.

2. Over the years our club at Roding Lane North has become a centre for sport and an integral part of the local community. The Club is open seven days a week and is used for Rugby, either training or playing, and as a facility for the local community and can be hired for functions. We have a floodlit training pitch outside the Clubhouse and a second pitch and junior pitch. The whole playing area is divided into two, one roughly square and one rectangular, they contain the Clubhouse, pitches, car-park and storage containers. There are two vehicle access gates from Roding Lane North to the left and right of our Clubhouse. The two vehicle access points have height restrictions, as well as double

gates. We run teams for boys and girls, of all age groups from toddlers up to 12 years old, the age groups from 13 year up to 18 year olds are currently only for boys. We also have three senior sides. The Clubhouse is used every Friday by the local community for prayers and most weeks there will be people and organisations using the facility for training purposes during the day with social events and activities in the evening. Accordingly, we are an established local club, providing excellent facilities which are valued by the local community.

3. In early September 2017, the Club was the victim of criminal damage, unlawful entry / occupation on our site and anti-social behaviour by Travellers. This resulted in a significant financial loss for our Club, together with a high degree of anxiety and concern for our members, guests and the local community. Around midnight on the night of the 3<sup>rd</sup> 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. In doing so they crossed over our 1<sup>st</sup> team pitch, drove across the junior pitch and set up an encampment on the boundary and dead ball area of our 3<sup>rd</sup> senior pitch.