

that they were now awaiting a date for the High Court hearing. The gentleman added that he was in the process of cancelling all sporting and social events booked for that weekend. Mr Lewis and I asked the gentleman to keep us updated and we gave him our contact details. We then left the clubhouse.

18. Whilst walking back to our vehicle, I saw one of the traveller's vans leave the playing field. I noted the vehicle registration number, JXZ 5585, down and emailed it to myself via my iPad. I exhibit at [Exhibit TS8] the email that I sent to myself containing the vehicle registration number. Just as we were about to leave the car park, I saw another one of the vans leave the playing field. I noted the vehicle registration number, KM60 HFW, down and emailed it to myself via my iPad. I exhibit at [Exhibit TS9] the email that I sent to myself containing the vehicle registration number.

1st August 2017 – Ray Park

19. I am aware that on 1st August 2017, my colleague, Stephen Lewis, Senior Redbridge Enforcement Officer, received a report of an unauthorised encampment on Council land at Ray Park, Snakes Lane East, Woodford Green, IG8 7JQ.

20. On 4th August 2017, at approximately 16:15, I attended Ray Park with officers from the MPS and Redbridge Enforcement Team to assist with the serving of the Section 61 and Section 77 Criminal Justice and Public Order Act 1994 notices. When I arrived, I observed a number of caravans and vehicles parked around the perimeter of the grassed area to the side of Ray Park's car park. There were 15 caravans, 11 vehicles and 1 motor home. I took photographs of the notices being placed on the 11 vehicles present and noted down their registration numbers: KM60 HFW; GD10 XRC; KF07 OOC, SG16 EBJ; DN12 NMJ; HV53 VAU; JXZ 5585; FN63 XBX; LB10 ZBD; AE02 EGK; EK12 COJ; and FY02 OUH. I exhibit at [Exhibit TS10] the photographs of the notices being served. The travellers were given until 18:00 on 5th August 2017 to vacate land by the lead MPS officer.

21. On 5th August 2017, at approximately 18:00, I attended Ray Park with Mr Lewis. Upon arrival we witnessed the MPS enforcing the Section 61 notice and moving the travellers on. Shortly after our arrival at Ray Park, Mr Lewis and I were told by a MPS officer present that the travellers from Ray Park had only travelled a short distance and were now attempting to trespass on another Council owned site, Ashton Playing Fields, 598 Chigwell Road, Woodford Green, IG8 8AA.

5th August 2017 – Ashton Playing Fields

22. Stephen Lewis, Senior Redbridge Enforcement Officer, and I arrived at Ashton Playing Fields at approximately 18:15 on 5th August 2017. Upon arrival, we found three MPS units in attendance and a number of vehicles and caravans parked in the front car park. It was clear that this group of travellers were the same as those previously encamped in Ray Park because I recognised a number of the individuals and some of the vehicle registration numbers were the same. Mr Lewis and I questioned why so many MPS units were in attendance and were advised that a member of staff from Vision, the organisation responsible for managing Ashton Playing Fields, had been struck by one of the travellers' vehicles as she tried to protect the site and deny access to the rear car park and playing fields. The officer from Vision, who I now know to be Stephanie Hahn, could not identify the perpetrator, therefore no arrest was made. Whilst on site, Mr Lewis and I spoke to another staff member from Vision, Ruth Pinner, who advised that she would be cancelling all sport and social events booked for that weekend.

23. Eventually, after seeking advice from the MPS and much negotiation with the travellers, Ms Pinner reluctantly agreed that the group could move on to the rear car park. Ms Pinner specifically asked the travellers not to go

on to the grass football pitches behind and to the side of the rear car park. Mr Lewis and I then left the site. Shortly after, Ms Pinner contacted us to advise that the travellers had ignored her request and were now setting up camp on the football pitches. Mr Lewis and I agreed to enact LBR's Unauthorised Encampment Protocol.

24. On the morning of 7th August 2017, I returned with my colleague John Rodwell, Redbridge Enforcement Officer, to Ashton Playing Fields along with officers from the Council's Housing, Children's Services and Adult Social Services departments in order to conduct the welfare visit. When I arrived, I observed 14 caravans and 8 vehicles parked around the perimeter of the football pitch to the rear of Ashton Playing Field's running track. Mark Hillman, Housing, Katie Jarvis, Children's Services and Mbuete Mido, Adult Social Services asked whether the travellers had any health, social, housing issues or needs. During the welfare visit, I made it clear to those present that as the group had not sought permission from the Council to encamp on the land, they were there unlawfully and trespassing. One of the travellers, a lady who was pregnant, informed me that some of the group had ties to Bournemouth and that they had come to Redbridge in order to attend a wedding. All of the travellers spoken to by my colleagues and I refused to give their names and declined all offers

of support. I exhibit at [Exhibit TS11] documents relating to the welfare visit, namely LBR's Unauthorised Encampment Protocol's 2nd Visit Form and the Housing, Children's Services and Adult Social Services officers' completed Welfare Forms.

25. After confirming that there were no welfare concerns, I sought an eviction decision from John Richards, Head of Civic Pride and Enforcement. I met with Mr Richards on 8th August 2017. Mr Richards agreed that the Redbridge Enforcement Team should seek to evict the travellers from the site. I exhibit at [Exhibit TS12] a document relating to the eviction decision, namely LBR's Unauthorised Encampment Protocol's Decision Form. I then went off duty, leaving my colleague Simon James, Senior Redbridge Enforcement Officer, to serve the eviction letter.

26. In early September 2017, the same group of travellers were still present at Ashton Playing Fields. On 7th September 2017, at approximately 11:20, I attended Ashton Playing Fields with Owen Jones, Redbridge Enforcement Officer. The purpose of the visit was to serve a Summons in accordance with Section 78 of the Criminal Justice and Public Order Act 1994 directing the travellers to attend a hearing at Barkingside Magistrates' Court at 2pm on 8th September 2017. When I arrived on site,

there were 11 caravans, 5 vehicles and 1 motor home. At approximately 11:25 hours Owen Jones and I began to serve the summonses on the caravans, cars and individuals present. Where possible I placed a copy of the summons on each vehicle. In order to evidence the service of the summonses, I attempted to take photographs. I was able to photograph some of the vehicles, but not all. When attempting to take a photograph of one individual's car I was told to stop and that if I didn't I would *'fucking regret it'*. After the final caravan had been served at approximately 11:35 hours Owen Jones and I left the site. I exhibit at [Exhibit TS13] the Summons served on the travellers at Ashton Playing Fields.

27. On 8th September 2017, I attended Barkingside Magistrates' Court with Ken Cohen, Litigation Lawyer (LBR), and Matthew Lewin, Barrister (Cornerstone Barristers). The purpose of attending was to seek an eviction order in accordance with Section 78 of the Criminal Justice and Public Order Act 1994. LBR's application was successful and the Order was granted. I exhibit at [Exhibit TS14] the Section 78 Criminal Justice and Public Order Act 1994 Order. Whilst at Court, I received a telephone call from Harveil Toor, Redbridge Enforcement Team Manager. Ms Toor advised me that the travellers at Ashton Playing Fields had begun to leave

of their own accord. By approximately 15:30 the site was clear of travellers.

4th September 2017 - Wanstead Rugby Football Club

28. I am aware that on 4th September 2017, my colleague Simon James, Senior Redbridge Enforcement Officer, received a report of an unauthorised encampment on Council land at Wanstead Rugby Football Club, Roding Lane, Woodford Green, IG8 8JY.

29. On 11th September 2017, at approximately 15:15 hours, I attended Wanstead Rugby Football Club with my colleague, Stephen Lewis, Senior Redbridge Enforcement Officer and Redbridge Enforcement Officers Owen Jones and Allan Towner. Four MPS officers were also in attendance. The purpose of attending was to serve a summons in accordance with Section 78 of the Criminal Justice and Public Order Act 1994 directing the travellers on the land to attend a hearing at Barkingside Magistrates' Court at 11am on Thursday 14th September 2017. When I arrived on site, there were 4 caravans, 4 vehicles and 2 motor homes. At approximately 15:20 hours I began to serve the summonses on the caravans, vehicles and individuals present. I hand delivered the document to five individuals. Where possible I placed a

copy of the summons on each vehicle and caravan. The caravans and vehicles that were not answered or unoccupied at the time were left a copy either underneath the windscreen wiper of the vehicle or on the door of the caravan. Each summons was placed in a prominent place and protected from the elements via a plastic wallet. After the final caravan had been served at approximately 15:35 hours my colleagues and I left the site. Upon leaving the site, I placed a copy of the summons on the front gate of Wanstead Rugby Football Club. I exhibit at [Exhibit TS15] the Summons served on the travellers at Wanstead Rugby Football Club.

30. On 14th September 2017, I attended Barkingside Magistrates' Court with Ken Cohen, Litigation Lawyer (LBR), and Zachary Kell, Barrister (Five Paper). The purpose of attending was to seek an eviction order in accordance with Section 78 of the Criminal Justice and Public Order Act 1994. LBR's application was successful and the Order was granted; the travellers were given until midday on 15th September 2017 to vacate the land. I exhibit at [Exhibit TS16] the Section 78 Criminal Justice and Public Order Act 1994 Order. Once the Order was obtained, assistance with the eviction of the travellers was sought from the MPS and bailiffs from DCBL.

31. Later that day, I returned to Wanstead Rugby Football Club with my colleague, Sarah Kaye, Senior Redbridge Enforcement Officer, to serve the Order. Whilst on site, Ms Kaye and I investigated a report received from a local resident that morning about further waste being dumped at the rear of Wanstead Rugby Football Club on Roding Valley Park Trail. At 14:15, Ms Kaye and I drove on to Roding Valley Park Trail. Approximately quarter of a mile down the trail Ms Kaye and I found a number of large fly tips. The fly tips consisted of mainly of wood, building materials, mattresses, household appliances and black bags of domestic waste. I exhibit at [Exhibit TS17] photographs of the fly tips found on Roding Valley Park Trail.

32. On the morning of 15th September 2017, I attended Woodford Police Station with Ms Kaye and Redbridge Enforcement Officers Jill Kitson, Ravinder Sappal, Mohammed Munir and Ammanuel Asfaw for a pre eviction briefing. After the briefing, Ms Kaye and I went to Wanstead Rugby Football Club to inform the travellers that bailiffs, Redbridge Enforcement Officers and officers from the MPS would be attending the location at 12:00 in order to evict them from the land. Whilst on site, at approximately 11:30, Ms Kaye and I witnessed a white, medium sized, flatbed van full of what appeared to be building waste drive onto the rugby pitches. At this time both Ms Kaye and I were in the Redbridge

Enforcement Team's Land Rover. Ms Kaye drove up to the van and asked the driver, a young, white male in his early twenties, to produce his waste carriers licence; he laughed and refused. The man then started to drive his van towards the access point for Roding Valley Park Trail.

33. Having visited the previous day and already being aware of the extensive fly tipping on the Trail, Ms Kaye and I believed that the man was planning to dump the waste on the back of his van on the Trail. Using the Land Rover, Ms Kaye went on to block the van's access to the Trail. The driver quickly became aggressive and abusive, driving towards us at speed whilst shouting obscenities and making rude hand gestures. Ms Kaye and I stood our ground, refusing to let the van pass. After a couple of minutes, the man gave up and left Wanstead Rugby Football Club.

34. Shortly after 12:00, officers from the Redbridge Enforcement Team and the MPS arrived on site. Ms Kaye and I advised the travellers that the deadline for vacating the land had now passed and that bailiffs would shortly be arriving to evict them from the land. The majority of the travellers began to pack up their belongings, hitch their caravans to their vehicles and leave the site. Redbridge Enforcement Officers and officers from the MPS followed the convoy of vehicles off the site. Ms Kaye and I remained on site.

35. By approximately 13:00 it became apparent that the bailiffs would not be needed, as only a couple of individuals and vehicles remained on site. Even though I stood the bailiffs down, a cancellation cost of £594 was still incurred . I exhibit at [Exhibit TS18] an invoice from DCBL
36. Shortly after 13:00, I received a telephone call from the lead MPS officer who informed me that the travellers had failed to leave Redbridge and that they were now encamped on another piece of Council owned land, the open space at Hurstleigh Gardens, IG5.
37. Ms Kaye and I remained at Wanstead Rugby Football Club until the last of the travellers vacated the land. By approximately 14:30 the site was clear of travellers and their vehicles. Whilst waiting for the remaining travellers to leave, I confirmed that the open space at Hurstleigh Gardens was Council owned land and arranged for a welfare visit to take place at 16:00 that day.

15th September 2017 - Hurstleigh Gardens

38. On the afternoon of 15th September 2017, at approximately 16:20, I attended the open space at Hurstleigh Gardens along with my colleague Sarah Kaye, Senior Redbridge Enforcement Officer, and officers from the Council's Housing, Children's Services and Adult Social Services departments in order to conduct a welfare visit. Upon our arrival, it was clear that this group of travellers were the same as those previously encamped in Wanstead Rugby Football Club because I recognised a number of the individuals and vehicles present.

39. When my colleagues and I approached the travellers we were met with hostility. The man I believe to be the leader of the group was extremely agitated and upset and asked me why the Council could not just *'fucking leave them be'*. I explained that we had already received complaints from local residents about their presence and that, as the group had not sought permission from the Council to encamp on the land, they were there unlawfully and trespassing. I advised the man that the Council would now be doing all it could to expedite the eviction process. The young men and children of the group then began trying to intimidate me and my colleagues.

40. At one point I was surrounded by four young men in their late teens/early twenties and two younger boys. All were shouting and swearing, telling me I had no right to be there and that I had *'best get back in the car before something happens'*. One of the older boys tried to grab my identification card and lanyard from around my neck. Although I stood my ground, I found this to be frightening experience. Eventually, Ms Kaye and I managed to calm the situation down. I went on to confirm with the groups' apparent leader that all offers of support made were being declined. During the welfare visit I noted down the following vehicle registration numbers: NG09 XCU; KP09 WRV; KM56 WJA and FN58 ULU. I exhibit at [Exhibit TS19] a document relating to the initial visit, namely LBR's Unauthorised Encampment Protocol's 1st Visit Form.

41. After confirming that there were no welfare concerns, I sought an eviction decision from John Richards, Head of Civic Pride and Enforcement. I asked Mr Richards' permission to waive the 48 hour eviction letter because was the third unauthorised encampment on Council owned land by this particular group in recent months. I met with Mr Richards on 15th September 2017. Mr Richards agreed that the Redbridge Enforcement Team should seek to evict the travellers from the site. I exhibit at [Exhibit TS20] a document relating to the eviction

decision, namely LBR's Unauthorised Encampment Protocol's Decision Form. I then went off duty leaving my colleague Simon James, Senior Redbridge Enforcement Officer, to serve the Section 77 Criminal Justice and Public Order Act 1994 notice.

42. On the afternoon of 20th September 2017, I returned to the open space at Hurstleigh Gardens with Mr James. The purpose of the visit was to serve the eviction order and evict the travellers from the land. I exhibit at [Exhibit TS21] the Section 78 Criminal Justice and Public Order Act 1994 Order. Mr James and I were accompanied by officers from the MPS and bailiffs from Burlington Group.

43. The bailiffs from Burlington Group led the eviction process. At approximately 16:00, the lead bailiff spoke to all of the travellers present, advising them that they were required to vacate the land immediately. I heard the lead bailiff being told by one of the women on the site that a number of the 'men' were at work and that it would take some time to get them back. Within approximately 30 minutes the first of the 'men' began to arrive back on to the site. After approximately an hour, all of the 'men' had returned and the travellers began to pack up and hitch their caravans to their vehicles.

44. Whilst waiting for the group to leave, Mr James and I had to stop a number of local residents and school children from walking through the site for their own safety; there were a couple of dogs on the loose and some of the older children were taking it in turns to ride a small quad bike up and down the footpath at speed.

45. During the eviction, I witnessed the travellers discard items of domestic waste on the ground to the side of their caravans and in the bushes adjacent to their caravans - no attempt was made to dispose of these items in the appropriate way.

46. As the travellers began to leave the site, I noted down the following vehicle registration numbers: KP09 WRV; HJ52 KWP; BD10 NBA; SD14 THF; BD14 UCR; LN52 SVS; BX52 WCA; DX15 BVY; PK53 OHE; LT60 YND; SP09 MDV; Y843 WGO; SH57 ASO; BF03 XKZ; V154 KJN; T113 KDA; WL04 EBX; GF57 VSA; LD59 DKX; EJ55 NKE; EY04 UGK and CP08 WEW. I exhibit at [Exhibit TS22] a photocopy of the list of vehicle registration numbers.

47. After approximately two and a half hours, the last of the travellers were ready to leave the site. Mr James and I returned to the Land Rover and

followed the last vehicle off. It was clear that the group intended to stay together, Mr James and I witnessed the vehicles to the rear of the convoy go through red traffic lights to ensure that they did not become separated from the others. We followed the convoy to Charlie Brown's Roundabout where we witnessed the vehicles enter the slip road to the A406 and drive in the direction of Waltham Forest.

48. After ensuring that all of the travellers had left Redbridge, Mr James and I returned to the open space at Hurstleigh Gardens in order to ascertain exactly how much damage had been done to the land. Upon our return, Mr James and I entered the wooded area and found a number of large fly tips containing items such as building waste, domestic appliances, domestic waste, cardboard, wood, mattresses, sand and broken glass. I exhibit at [Exhibit TS23] photographs of the fly tipped waste. I was shocked at the level of fly tipping on the site, especially given the fact that the travellers had only entered the land on 15th September 2017. Whilst conducting the site inspection, I found evidence to suggest that the travellers had been using the wooded area as a makeshift toilet; I found human excrement and tissue paper in a couple of different locations. After contacting Kensons and arranging for the site to be cordoned off to the public, Mr James and I left.

49. On 22nd September 2017, I received Burlington Group's invoice. The use of bailiffs to evict the travellers from the open space at Hurstleigh Gardens cost the Council £7,864.80. I exhibit at [Exhibit TS24] Burlington Group's invoice dated 22nd September 2017.

21st September 2017 - Redbridge Recreation Ground

50. On the morning of 21st September 2017, I received a report from a colleague in Vision that travellers had broken on to Council owned land at Redbridge Recreation Ground, Keswick Gardens, Ilford, IG4.

51. At approximately 13:30, I attended Redbridge Recreation Ground with my colleague Allan Towner, Redbridge Enforcement Officer, along with officers from the Council's Housing, Children's Services and Adult Social Services departments in order to conduct a welfare visit. I exhibit at [Exhibit TS25] documents relating to the welfare visit, namely LBR's Unauthorised Encampment Protocol's 1st Visit Form and the Housing, Children's Services and Adult Social Services officers' completed Welfare Forms.

52. Upon our arrival, it became clear that the individuals unlawfully encamped on the land were the same as those evicted from the open space at Hurstleigh Gardens the previous day. I recognised the man I believed to be the leader of the group and his wife and the registration numbers of some of the vehicles present matched those that I had noted down the previous day, namely: SP09 MDV; CP08 WEW; PK53 OHE and EY04 UGK. I advised those present that as the group had not sought permission from the Council to encamp on the land, they were there unlawfully and trespassing.

53. Adekunle Adewumi, Housing, Brian Gill, Children's Services and Delphine Etube, Adult Social Services asked whether the travellers had any health, social, housing issues or needs. All offers of support were declined.

54. After confirming that there were no welfare concerns, I sought an eviction decision from John Richards, Head of Civic Pride and Enforcement. I asked Mr Richards' permission to waive the 48 hour eviction letter because was the fourth unauthorised encampment on Council owned land by this particular group in recent months. I was also conscious of the fact that a significant amount of waste had been

dumped by this group at all of the sites they had previously been encamped upon. Mr Richards agreed that we should seek to evict the travellers as quickly as possible. I exhibit at [Exhibit TS26] a document relating to the eviction decision, namely LBR's Unauthorised Encampment Protocol's Decision Form. I then went off duty leaving my colleague Stephen Lewis, Senior Redbridge Enforcement Officer, to serve the Section 77 Criminal Justice and Public Order Act 1994 notice.

18th October 2017 – Kearley and Tonge Sports Ground

55. On 18th October 2017, at approximately 17:30, I attended Kearley and Tonge Sports Ground, Royston Gardens, Ilford, IG1 1SY, with Redbridge Enforcement Officer Owen Jones. The purpose of the visit was to ascertain how much damage had been done to the land by the travellers that had been moved on under a Section 61 Criminal Justice and Public Order Act 1994 notice served by the MPS earlier that day. Upon arrival, Mr Jones and I were informed by the two MPS officers present that the travellers had only been on the land for a couple of hours.

56. Mr Jones and I drove on to the site and headed to the rear of the Sports Ground. I was shocked by the level of fly tipping we found, especially as the travellers had only been on site for a couple of hours. There were

approximately eleven large fly tips consisting of building materials, wood, sand, metal, plastic sheeting, black bags of domestic waste, mattresses, cardboard, domestic appliances, garden waste and used carpet. I exhibit at [Exhibit TS27] photographs of the waste found. Mr Jones and I waited on site until the access point to the Sports Ground was made secure by colleagues in the Council's Highways Department.

18th October 2017 – Woodford Trading Estate

57. I am aware that on 18th October 2017, a group of travellers broke on to private development site within the Woodford Trading Estate, Southend Road, Woodford Green, IG8 8HF. I am also aware that the travellers moved on of their own accord on 24th October 2017.

58. On the afternoon of 24th October 2017, I attended the location in order to ascertain how much damage had been done to the land. Upon inspection, I found an extensive amount of fly tipping, consisting of mainly wood and building materials. It appeared that the fence to the rear of the property had given way due to the weight and volume of the waste dumped on the site. I exhibit at [Exhibit TS28] photographs of the waste found.


20th October 2017 – Wanstead High Street Development Site

59. I am aware that on 20th October 2017, a group of travellers broke on to privately owned land adjacent to Wanstead High Street. I am also aware that on 24th October 2017 a Section 61 Criminal Justice and Public Order Act 1994 notice was served on the group by officers from the MPS.

60. On the afternoon of 24th October 2017, I attended the location with Harveil Toor, Redbridge Enforcement Team Manager, and the landowner, Mr Sanger, in order to monitor the eviction. The travellers moved on and the land was clear of vehicles and caravans by approximately 16:30. It was clear that damage had been done to the land. I could see a number of large fly tips to the rear of the site. Once vacant, Mr Sanger secured the site and Ms Toor and I returned to the office.

Statement of Truth

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

Signed: 
Name: TRACY SCOTT
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 TRACY SCOTT

EXHIBIT TS/1

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/2

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/3

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/4

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/5

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

(1) MARTIN STOKES & 99 OTHER NAMED DEFENDANTS

(101) PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/6

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/7

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/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 TRACY SCOTT

EXHIBIT TS/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 TRACY SCOTT

EXHIBIT TS/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 TRACY SCOTT

EXHIBIT TS/11

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/12

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/13

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/14

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/15

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/16

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/17

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/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 TRACY SCOTT

EXHIBIT TS/19

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/20

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/21

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/22

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/23

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER: 5

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/24

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/25

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/26

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/27

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

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

Defendants

WITNESS STATEMENT OF TRACY SCOTT

EXHIBIT TS/28

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

CLAIM NUMBER:

BETWEEN

The London Borough of Redbridge

Claimant

And

(1) MARTIN STOKES & 99 OTHER NAMED DEFENDANTS

(101) PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF TRACY SCOTT

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

P: 0208 724 8379

Claimant
C Bradley
First
Exhibits: CB/1-2
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

WITNESS STATEMENT OF CARL BRADLEY

I, Carl Bradley, Senior Redbridge Enforcement 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. On 21st April 2017, I was on duty and I received a complaint regarding travellers on the land at the rear of a site known as Kearley and Tonge

Sports ground. At 1.30pm, I carried out an initial visit and assessment with my colleague Mr John Rodwell. Upon arrival at the site we found the gates were open and there were several vehicles and caravans on the far side of the field. I observed that the front gates had been damaged to gain access and there was a significant fly-tip at the rear left hand site of the site. There were nine adults and four children present, I spoke with these occupants and recorded my observations and conversation on 'form 4 Initial Investigation', which is now Exhibited and shown to me marked **Exhibit CB/1**.

3. Whilst at the site I carried out an inspection of the lamp post at the entrance to the Close, leading to the site, to ascertain if it was feasible to install a CCTV camera. I reported my observations to the Senior Officer on duty within the Borough CCTV department who installed a CCTV camera because there had been previous fly tipping at that location. In line with Redbridge Borough Council's protocols I arranged another visit to the site to conduct a 'Welfare Visit'.
4. The welfare visit took place at 3.30pm on 21st April 2017, I was accompanied by Mr Richard Harris of Redbridge Children's Services, Mr Mark Hillman from the Housing Department and Mr Mark Cole from Adult Social Services. These officers visited all of the occupants of the caravans, following their assessments it was confirmed that they had no concerns regarding Redbridge Borough instigating proceedings to evict the travellers from the site. During this second visit I observed three caravans and three Ford Transit vehicles on the site. One caravan had the registration number RJ66N29 and was parked next to a Ford Transit with the same registration number. The second caravan had the registration number ND13MRV and was

parked next to a Grey Ford Transit with the same registration number. The third caravan had the registration number NA10YXH affixed. There was a Red Ford Tipper Transit next to this caravan with sign writing on the side stating 'Forestry Tree Care - 0757061679' displaying another registration number NM07DKH. I recorded a note with the title 'Welfare Visit' (Exhibit CB/2).

5. I requested on that night and over that weekend that officers observe the site. They reported that the travellers left the site and that the site was clear. It would appear that this was a direct result of a CCTV being installed at the entrance to the Close.

Statement of Truth

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

Signed: 

Name: CARL BRADLEY

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

WITNESS STATEMENT OF CARL BRADLEY

EXHIBIT CB/1

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 CARL BRADLEY

EXHIBIT CB/2

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

WITNESS STATEMENT OF CARL BRADLEY

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
P: 0208 724 8379

Claimant

S Lewis

First

Exhibits SL1 – 7

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 STEVEN LEWIS

I, Steven Lewis, Senior Redbridge Enforcement 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 by the London Borough of Redbridge Civic Pride department as a Senior Enforcement Officer. I am accredited under the Community Safety Accreditation Scheme and have a Diploma in Acoustics from the Institute of Acoustics. I have worked for the London Borough of Redbridge for approximately 15 years. I make this statement in support of the Claimant's application for an injunction against the above named defendants. The facts contained in this statement are true and are from my own knowledge, unless stated otherwise, in which case they are true to the best of my knowledge and belief.

3. One of my key responsibilities since April 2017 has been to deal with Trespasser Incursions within the Borough in accordance with the borough's Unauthorised Encampment Protocol. This responsibility previously came under the remit of the Emergency Planning department. My role as a Senior officer within the Enforcement team is to co-ordinate the Council's response to a notification that there may be an unauthorised encampment in the Borough. This involves carrying out site visits to confirm the reports, completing initial assessment forms, arranging welfare checks with other Council departments, serving notices to evict, obtaining Court summons, serving the summons, giving evidence at Court hearings and evicting travellers off of Council land.

4. Since April 2017, I have responded to a number of unauthorised encampments in the Borough.

20th July 2017 Kearley and Tonge Playing Fields

5. On the 26th July at approximately 10am, I attended the Kearley and Tonge Sports Ground, Royston Gardens, Ilford, IG1 1SY to assist with the eviction of travellers that I was aware had been present on the site since the 20th July 2017. My role on this day was to remain at the front entrance to the fields with Senior Redbridge Enforcement officer Simon James and two Police officers to prevent anybody from entering the site that were not already there when we arrived. This was whilst Tracy Scott and Sarah Kaye, both Senior Enforcement officers, accompanied by a large number of Enforcement and Police officers enforced the eviction from the land. I was present for approximately 2 hours before being stood down as a time was agreed with the travellers for later in the day and it was decided that there was no need to keep as many officers present throughout the afternoon.

28th July 2017 – Bancroft Rugby Football Club

6. On the morning of the 28th July 2017, the Redbridge Enforcement Team received a report of an unauthorised encampment on private land at Bancroft Rugby Football Club, Buckhurst Way, Buckhurst Hill, IG9 6JD from a concerned local resident with very little information other than that there were travellers with caravans on the land. I conducted a site inspection with my colleague Tracy Scott, Senior Redbridge Enforcement Officer. Upon arrival, I drove down towards the club house and entered the car park area where we could see in the next field to our right a number of vehicles and caravans parked in a ring around the edge of the field. The field was tree lined except for a gap where access had been obtained and it was difficult to get a better view to obtain more details such as number plates and vehicle make and models without actually driving into the field. As the land was

private we made the decision not to put ourselves at a risk as we knew we had no jurisdiction. Mrs Scott made a note of what she could see and I parked outside the clubhouse to go in and speak to someone. We entered and spoke with a gentleman who identified himself as the club secretary and he appeared to already have the matter under control. He advised that he had spoken with the clubs' solicitors who were getting the papers together to file at Court for an injunction and were awaiting a date. In the meantime, he had already begun to cancel all planned sporting and social events that were booked at the club for the forthcoming weekend. We asked that he keep us apprised of the situation and left our details before leaving the site.

1st August 2017 Ray Park

7. On the 1st August 2017 at approximately 20.30 hours the Council received a report from a member of the public that there a large group of caravans were pitched up in Ray Park, Snakes Lane East, Woodford Green, IG8 0BZ. This land is Council owned and managed by Vision on behalf of the Council. As the Senior Officer on duty, I drove to Ray Park to conduct a site visit. I arrived at approximately 21.00 hours and on approach was able to see from Snakes Lane East a number of caravans in the park. I drove through the main gate and stopped on the driveway where I could see that the internal barrier ahead that was sign posted 'for authorised and emergency vehicles only' was wide open. To my right was a car park and beyond that was a green space that had been inhabited by 15 caravans or motorhomes and associated vehicles. They were spread around the boundary of the field forming a ring. I assessed the situation and considered that as I was alone, it would be a high risk to approach due to the volume of travellers on site and so I completed a Form 4: Initial Investigation in accordance with the Unauthorised

Encampment protocol as best as I could from a distance and then left the site. I produce as [Exhibit SL/1] a copy of that form.

8. Once I returned to the office I notified Vision of the incursion and telephoned the Police Safer Neighbourhood team for Bridge ward which Ray Park is within. I left a message on their voicemail notifying them of the incursion. On that day, my shift and the Enforcement service finished at 22.00 hours so I sent emails to the duty Seniors rostered on the following day early shift to advise of the situation and to begin the next stage of the process in-line with the protocol.
9. On the 5th August 2017 I attended Ray Park with Tracy Scott, Senior Redbridge Enforcement Officer as the Police had notified the Council that they would be evicting the travellers for non-compliance of a Section 61 notice served in accordance with the Criminal Justice and Public Order Act 1994. We arrived on site at approximately 18.00 hours and parked in the small car park to the front of the park next to a Police van where officers were observing the remaining travellers getting ready to leave. The majority of the travellers had already evacuated the site. We spoke with the officers who gave us an update that they had evicted with relative ease but since doing so there had been reports on the Police radio of an incident involving travellers at another location less than a 2 minute drive from the Ray Park site.

5th August 2017, Ashton Playing Fields

10. After being advised of the ongoing incident by the Police at Ray Park, we left the site and immediately made our way to Ashton Playing Fields, 598

Chigwell Road, Woodford Green, IG8 8AA, arriving at approximately 18.15 hours. Upon arrival, we found a large number of vehicles and caravans in the immediate car park, some of which had already been set down off of the tow bar. The rest were still attached to the vehicles that had been used to drive them in. I completed a Form 4: Initial Investigation in accordance with the Unauthorised Encampment protocol and I produce as [Exhibit SL/2] a copy of the form. I noted the following number plates: PK53 OHE; FB03 GUL; AE02 EKG; LX07 HXR; EO09 JCU; SG16 EBJ; EK12 COJ; NJ12 RVT; FN63 XBX; AO10 LNZ; GD10 XRC; PX56 ODW; JXZ 5585; NX05 KFT; ET11 VSM and LB10 ZBD.

11. Mrs Scott identified the vehicles at the location as being the same that had been unauthorisedly encamped at Ray Park. A number of males were standing in the car park area talking to Police officers whilst women and children sat in the vehicles waiting. Mrs Scott and I identified ourselves to the Police officers who confirmed that they had received a report of travellers attempting to break into the site from the Centre manager. There were three Police units on site and approximately nine Police officers. After speaking with the Police officers, myself and Mrs Scott were informed that the Centre Manager who I now know to be Steph Hahn heard the vehicles arrive on site, saw that a group of males were attempting to gain access to the lower car park via a locked gate and in her efforts to stop them had been hit by a vehicle that was deliberately driven at her in an attempt to intimidate. We were also informed that the padlock for the gate had already been broken off by the time she had run the length of the car park and despite being struck by the vehicle she had prevented access and held them at bay until the Police arrived. She had also called her manager who I now know to be Ruth Pinner and she was also now present. The travellers were refusing to leave.

12. The Police advised that as Ms Hahn could not identify the person driving the vehicle that struck her, no further action would be taken and as no criminal activity could be proven, they had no grounds to prevent the travellers from occupying the land until an eviction process could be undertaken. Discussions were ongoing whilst we were present between representatives of the travellers, a couple of the Police officers and Ms Pinner and eventually it was accepted that without the Police support to evict immediately, the Council had to accept that they would remain until evicted in accordance with the Unauthorised Encampment protocol. The group agreed that they would set down their caravans and vehicles in the lower car park but would not enter the playing fields. Once this was agreed, Mrs Scott and I left the site as did the Police. Within the hour, Ms Pinner from Vision had reported to us that the travellers had broken onto the fields and not adhered to the agreement.

22nd August 2017, Ford Sports & Social Club

13. On the 22nd August 2017, the Redbridge Enforcement Team received a report of an unauthorised encampment on private land at Ford Sports & Social Club, Aldborough Road South, Ilford, IG3 8HG from a concerned local resident with very little information other than that there were a great number of caravans on the land. On the 23rd August 2017 I conducted a site inspection and confirmed the report observing approximately twenty caravans on site. There were a number of signs advising that the facility was closed for the immediate future so I returned to the office and contacted the club to try and establish what was being done to evict. I spoke with Michael McNally, the club manager who confirmed that the Ford legal team were working on the situation and were awaiting the Court appearance to obtain an order to evict.

4th September 2017, Wanstead Rugby Football Club

14. On the 6th September 2017 at approximately 16.50 hours, I attended Wanstead Rugby Football Club, Roding Lane, Woodford Green, IG8 8JY accompanied by two Redbridge Enforcement officers and two Police officers. The purpose of attending was to serve notices in accordance with Section 77 of the Criminal Justice and Public Order Act 1994 directing the travellers that I was aware had been on the land since 4th September 2017 to leave. Upon arrival we drove to the far field where the caravans were pitched and knocked at each caravan individually to hand deliver a copy of the notice. Any caravans that were unoccupied at the time or simply not answered were left a copy of the notice either on the windscreen underneath the wiper blade or attached to the outside of the vehicle using blue-tac. Any vehicles that were on the land and were not a caravan or motorhome and not attached to a caravan either were also left a copy of the notice under the wiper blade on the windscreen. Once all the vehicles had been attended to we left the site. I produce as [Exhibit SL/3] a copy of the Notice served.
15. On the 12th September 2017 at approximately 12.10 hours, I attended Wanstead Rugby Football Club, Roding Lane, Woodford Green, IG8 8JY accompanied by two Redbridge Enforcement officers and four Police officers. The purpose of attending was to serve a summons issued by Barkingside Magistrates Court in accordance with Section 78 of the Criminal Justice and Public Order Act 1994 to attend a hearing at the court scheduled for 11.00 hours on Thursday 14th September 2017. A summons had already been served on some of the vehicles that were there but the onsite security guard informed the Enforcement team that more travellers had arrived and that he was unable to prevent them from entering the land. Upon arrival we drove

to the far field where the caravans were pitched and knocked at each caravan individually to hand deliver a copy of the summons. Any caravans that were unoccupied at the time or simply not answered were left a copy of the notice either on the windscreen underneath the wiper blade or attached to the outside of the vehicle using blue-tac. Any vehicles that were on the land and were not a caravan or motorhome and not attached to a caravan either were also left a copy of the summons under the wiper blade on the windscreen. Once all the vehicles had been attended to we left the site.

21st September 2017, Redbridge Recreation Ground

16. On the 22nd September 2017 at approximately 13.05 hours, I attended Redbridge Recreation Ground, Keswick Gardens, Ilford, IG4 accompanied by a Redbridge Enforcement officer and five Police officers. The purpose of attending was to serve notices in accordance with Section 77 of the Criminal Justice and Public Order Act 1994 directing the travellers on the land to leave. Upon arrival we entered the park via a maintenance entrance on Woodford Bridge Road which was the nearest entrance to where the caravans were pitched and the one that access had been obtained. We knocked at each caravan individually to hand deliver a copy of the notice. Any caravans that were unoccupied at the time or simply not answered were left a copy of the notice either on the windscreen underneath the wiper blade or attached to the outside of the vehicle using blue-tac. Any vehicles that were on the land and were not a caravan or motorhome and not attached to a caravan either were also left a copy of the notice under the wiper blade on the windscreen. Once all the vehicles had been attended to we left the site. I produce as [Exhibit SL/4] a copy of the Notice served.

17. On the 26th September 2017 at approximately 15.30 hours, I attended Redbridge Recreation Ground, Keswick Gardens, Ilford, IG4 accompanied by a

Redbridge Enforcement officer and two Police officers. The purpose of attending was to serve a summons in accordance with Section 78 of the Criminal Justice and Public Order Act 1994 issued by Barkingside Magistrates court to attend a hearing at 14.00 hours on Wednesday 27th September 2017. Upon arrival we once again entered via the maintenance entrance on Woodford Bridge Road. We knocked at each caravan individually to hand deliver a copy of the summons. Any caravans that were unoccupied at the time or simply not answered were left a copy of the summons either on the windscreen underneath the wiper blade or attached to the outside of the vehicle using blue-tac. Any vehicles that were on the land and were not a caravan or motorhome and not attached to a caravan either were also left a copy of the summons under the wiper blade on the windscreen. Once all the vehicles had been attended to we left the site. I produce as [Exhibit SL/5] a copy of the Summons served.

18. On the 27th September 2017 I attended Barkingside Magistrates Court at approximately 14.00 hours for the scheduled hearing to obtain an eviction order for the travellers at Redbridge Recreation Ground. There were no representatives from the unauthorised encampment and the hearing went ahead without them. I was called as the only witness in the matter although was not examined. The court was happy for the Council's barrister to take the court through the events that had occurred at the location including officer statements. When finished the court awarded the eviction notice. I produce as [Exhibit SL/6] a copy of the order for removal of persons and vehicles unauthorisedly on the land at Redbridge Recreation ground. When I returned to the office to begin making preparations for the eviction I was informed by CCTV operators that the travellers had started to leave the site. I watched on camera as the last of the vehicles drove out of the park and so the eviction order was not needed. After all the travellers had vacated the

site, photographs were taken of the extensive damage to the land and the fly-tipping that had been left behind. I produce copies of these photographs as [Exhibit SL/7].

22nd December 2017 Woodford Trading Estate

19. On the 22nd December 2017 the Council received information that there were travellers encamped on part of the Woodford Trading Estate. I attended the location at approximately 15.15 hours and confirmed that there were four caravans visible in the rear car park of Riverside House which is the last unit on the right hand side from the entrance to the estate. There were two concrete blocks in the lay by next to it that appeared to have been dragged out of the way to gain access. I was aware that this site had been trespassed previously and made the assumption that the blocks had been used to secure it after. The gate was chained. Whilst on site, I made a call to JLL to notify them and confirm that the situation was being managed. I received a voicemail advising that the office was closed for Christmas so I left a message with my contact details and requested a call back when their offices re-opened.

20. On the 28th December 2017, I once again called JLL and spoke to a member of staff who advised that most of their site surveyors were still on leave. I was given an alternative number for emergencies which I then called. The person I then spoke to advised that they do have a report of this but that no action had yet been taken. My details were taken and I was assured that the Council would be kept apprised of developments.

31st December 2017 Land at Romford Road junction of Whalebone Lane North

20. On the 31st December, the Council received an email from Police Inspector Gellatley that there were trespassers on a piece of land that is at the junction of Romford Road and Whalebone Lane, just before the borough boundary. The email advised that the land owner had been contacted and that the vehicles were bogged down on the muddy land. The email stated that they would be leaving on the 2nd January 2018. I attended to check the site on the 4th January 2018 and observed upwards of twenty caravans at the location. I then re-attended on the 11th January and confirmed that the trespassers had left.

Statement of Truth

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

Signed: SB Lewis

Name: STEPHEN LEWIS

Date: 17/1/18

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 STEPHEN LEWIS

EXHIBIT SL/1

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 STEPHEN LEWIS

EXHIBIT SL/2

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 STEPHEN LEWIS

EXHIBIT SL/3

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 STEPHEN LEWIS

EXHIBIT SL/4

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 STEPHEN LEWIS

EXHIBIT SL/5

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 STEPHEN LEWIS

EXHIBIT SL/6

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 STEPHEN LEWIS

EXHIBIT SL/7

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 STEPHEN LEWIS

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

P: 0208 724 8379

Claimant

S James

First

Exhibits: SRJ1-16

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 SIMON JAMES

I, Simon James, Senior Redbridge Enforcement 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 by the London Borough of Redbridge, and have been for over 14 years, in the Place Directorate as a Senior Redbridge Enforcement Officer. I am accredited under the Community Safety Accreditation Scheme.
3. In April 2017, the Redbridge Enforcement Team took over responsibility for the London Borough of Redbridge's ('LBR') Unauthorised Encampment Protocol. Prior to this the responsibility for unauthorised encampments in LBR came under the remit of the Emergency Planning Department. As part of my responsibilities, I, and various other officers of LBR, have responded to an increasing number of unlawful encampments within the jurisdiction of LBR. The purpose of this statement is to detail the incursions that I have been involved with that have occurred within the London Borough of Redbridge since. The incursions are as follows:

Woodford Town Football Club April 2017

4. On the 27th April 2017, the Council received a report that travellers had taken up occupation of the land at Woodford Town Football Club, 267 Snakes Lane East, Woodford Green, IG8 7JJ. This land is owned by the Council and managed by Vision who are contracted to oversee the Council's parks and open spaces. I visited the location with Senior Enforcement Officer Tracy Scott at approximately 20:30 hrs but were unable to gain access as the travellers had locked and secured the gates. Police were already in attendance and explained that a local resident had witnessed the travellers force entry by cutting the padlock which was captured on CCTV. Police were not looking to take any further action at this time. On 28th April 2017 I attended the location to issue the travellers with an eviction letter but was not able to gain access to the site due to the gate being locked with a chain and padlock. I was able to walk along a path that ran along the site and allowed me to have a full and complete view of the travellers and I noted around the tree area where the children were playing there was human faeces. I spoke with some of the travellers who all refused to give me any names and I gave the eviction letter to the female who was willing to partially engage and explained what it was a copy of which is shown to me as [Exhibit SRJ/1]. Further into the site on the concreted area, to

the right as you would enter the location, there was extremely large amount of fly tipping.

Kearley and Tonge Playing Fields July 2017

5. On 26th July 2017 at approximately midday I attended the Kearley and Tonge site on Royston Gardens, Ilford to assist Police with the Enforcement of a Section 61 notice. Myself and fellow Senior Enforcement Officer Stephen Lewis remained in the vehicle at the entrance to the site to prevent any further unauthorised vehicle from gaining access. Senior Enforcement Officers Sarah Kaye and Tracy Scott entered the site with Police and engaged the travellers. Myself and Stephen Lewis left the site after approximately 2 hrs as Tracy Scott advised us Police were giving the travellers till 18:00 hrs to leave the site and there was no requirement for us to remain as there were now 2 uniformed officers monitoring the entrance.

Ray Park August 2017

6. On the 2nd August 2017 I arranged and carried out a joint welfare visit with officers from Adults and Children's Social Services and Housing at Ray Park, Snakes Lane East where 10 children from the travellers were rude abusive and jumping all over the Council vehicle refusing to stop. I produce copies of the welfare form completed by Adults and Childrens Social Services and Housing Needs as [Exhibit SRJ/2]. No welfare concerns were raised and I completed the decision form concluding that the travellers should be evicted which I produce as [Exhibit SRJ/3]. Mark Benbow, Head of Civic Pride, agreed with my assessment and made the decision to start the eviction process. I returned to this location on the 2nd August 2017 to issue the eviction letter stating that the travellers were required to leave site by 16.00 hours on the 4th August 2017 which I produce as [Exhibit SRJ/4]. This was not complied with and on the 4th August 2017, I served each vehicle with a notice pursuant to Section 77 of the Criminal Justice and Public Order Act 1994 which I produce a copy of as [Exhibit SRJ/5] The Police attended at the same time and also served a Section 61 notice

under the same legislation. The lead Police officer gave the travellers until 18.00 hours on the 5th August to leave.

Ashton Playing Fields August 2017

7. On 8th August 2017 at approximately 16:30 hrs Police Inspector Elise Gellately contacted me by telephone and advised me she had arranged for Police Officers from Ilford Police Station to attend Ashton Playing Fields. Senior management had already assessed the unauthorised encampment and made the decision to issue an eviction letter so that if Police did not enforce the section 61 notice we would be in a position to proceed and follow the unauthorised encampment protocol. I attended Ilford Police Station at approximately 17:10hrs with 6 Redbridge Enforcement Officers to meet the Police and then we all proceeded to Ashton Playing Fields.
8. At approximately 18.45 hrs I attended Ashton Playing Fields with Police and issued an eviction letter to all travellers present requiring them to leave the site by 09:00 hrs on 9th August 2017 which I produce a copy of as [Exhibit SRJ/6] and I also affixed a copy to each of the 14 caravans and 8 vehicles on the windscreen/window, the Police did not issue a section 61 notice at this time.
9. On 9th August at approximately 19:30 hrs I attended Ashton Playing Fields with 2 Police Sergeants and 2 Police Constables. All of the travellers who were present were issued with a notice pursuant to Section 77 of the Criminal Justice and Public Order Act 1994 requiring them to leave the site by 12:00 hrs on 10th August 2017 which I produce a copy of as [Exhibit SRJ/7]. Notices were also placed on the windscreens of 8 vehicles and 14 caravans or secured to the steps of the caravans.
10. On the 10th August at approximately 19:30 hrs and spoke with a 3 of the male travellers who refused to give their details. I advised them I had been instructed to speak with them as they had not complied with the notice served the previous day which required them to leave the location 12:00 hrs. My senior manager, John Richards, had spoken with Iain Varah, head of vision and they had agreed that they were willing to allow the travellers to stay at the site for a

few extra days as they were complying with our request to keep all rubbish in bags and the site clean. I asked the travellers if we leave them to it, in all honesty when will they be leaving the site and they all stated they would be leaving the Borough on Sunday 13th. I then agreed with them that they had until 18:00 on Sunday 13th August at which point if they were still at the site we will take formal action through the Courts.

11. On Monday 14th August the travellers had not left the site so it was decided by management to start the formal legal proceedings to have the travellers evicted with a section 78 notice. On the 7th September a summons was obtained from the Magistrates Court for the travellers to attend to have the matter heard. There was a long delay in obtaining a court order due to the Court advising that there were staff shortages over the summer holiday period.

Wanstead Rugby Football Club September 2017

12. On the 4th September 2017 at approximately 16:30 hrs the Council received reports that travellers had broken onto the land at Wanstead Rugby Football Club, Roding Lane North, Woodford Green, IG8 8JY. The land is owned by the Council and managed by Vision. I attended this location on the same day to carry out the welfare checks with officers from Adults and Childrens Social Services and Housing Needs. I completed the initial assessment form for the site visit which shows vehicles onsite with registration numbers KE55 KPF, S774 JTP, BD14 UCR, NX10 ORU, SH57 ASO, EF05 VDG & RV04 CYJ. I produce copies of the initial assessment form and welfare forms completed by Adults and Childrens Social Services and Housing Needs as [Exhibit SRJ/8]. No concerns were raised by Adults or Childrens Social Services or Housing. I completed the decision form, which I produce as [Exhibit SRJ/9]. I recommended that we should evict the travellers and Mark Benbow agreed made the decision that we will issue the eviction letter on the travellers. At approximately 18:00 hrs I returned to the site and carried out the 2nd visit. I then proceeded to issue each vehicle and person present with the eviction letter requiring them to leave the site within 48 hours. I produce a copy of the 2nd visit form and eviction letter as [Exhibit SRJ/10].

Hurstleigh Gardens Open Space September 2017

13. On the 15th September 2017 the Council switchboard received calls that travellers had encamped on the Green Space at Hurstleigh Gardens, Clayhall, IG5. The land is owned by the Council and managed by Vision. At approximately 18:50 hrs I attended the location and served a section 77 notice to all travellers present requiring them to leave the site within 24 hrs which I produce a copy of as [Exhibit SRJ/11]. On the 18th September I attend the above location at approximately 09.30 hrs to issue the Court Summons on the travellers, each vehicle and caravan was issued with a copy which was either secured on the windscreen or secured to the steps. On the 19th September at approximately 16.00 hrs. I attended the site to carry out a patrol and check the condition of the location. While patrolling the site I noted several large fly tips behind the long grass and within the wooded area next to the unauthorised encampment. I produce photographs taken at time of my visit of the fly tips as [Exhibit SRJ/12]. Along with the fly tip there was numerous locations with human faeces in the grass. On 20th September 2017 I attended the site at approximately 16:00 hrs with fellow Senior Officer Tracy Scott, colleague from MPS and Bailiffs to enforce the section 78 eviction notice issued by the magistrates Court. Myself and Tracy Scott remained at the entrance point to the encampment and redirected the general public away from the location while the Bailiffs enforced the order. Myself and Tracy Scott left the location at approximately 18:30 hrs to follow off the last vehicle to ensure it did not enter any other Council Land and we then returned to the location at approximately 19:00 hrs to carry out a site inspection.

Roding Valley Park September 2017

14. On the 28th September 2017 the Council received reports via telephone that travellers had broken into Roding Valley Park, Chigwell Road, Woodford Bridge, IG8 8AY via the Elmcroft Avenue entrance. The land is owned by the Council and managed by Vision. I attended the site at approximately 13.15 hours on the same day with Officers from Adults and Childrens Social Services and Housing

Needs to carry out the welfare visits and I also completed the initial assessment form. I produce a copy of the initial assessment form and completed welfare forms as [Exhibit SRJ/13.] No concerns were raised by any of Adults or Childrens Social Services or Housing and the group were now well known to the Authority as they had been seen by them at other unauthorised encampments across the Borough. While at the site I took several photographs of vehicles on the site which I produce as [Exhibit SRJ/14] showing vehicle registrations WL04 EBX, R695 TWB, W97 VUB, YJ09XXO, NA08 XNY, SD03 UXY, LN52 SVS, BX52 WCA, PK53 OHE, EJ55 NKE & SP09 MDV.

Kearley and Tonge Playing Fields October 2017

15. On 18th October 2017 at approximately 11:35 hrs I attended the Kearly and Tonge site on Royston Gardens with Officers from Adults and Childrens Social Services and Housing Needs to carry out the welfare visits. The gates were locked with a chain and padlock and there were 3 males from the travellers group stood watching us. The officers explained who they were and why there were there and refused to allow them access to carry out their checks so no forms were completed. I completed the initial assessment form which I produce as [Exhibit SRJ/15]. No decision was taken on evicting the travellers as Police issued and enforced a section 61 notice of the Criminal Justice and Public Order Act 1994 on the same day.

Tesco Barkingside October 2017

16. On the 17th October 2017, the Council received a report that there were travellers at Tesco, 796 Cranbrook Road, Barkingside, IG6 1HY. I attended the site and confirmed that there were 6 caravans and adjoining vehicles on the grassed area next to the Tesco car park and took photographs which I produce as [Exhibit SRJ/16] which shows registrations VHZ 3449, KM63 NDK & YA06 ONJ. I spoke with the duty manager who confirmed that they were aware of the situation and their legal team was dealing with the Court applications to have the travellers removed. No further action was required by the Enforcement Team as this was private land and a civil matter.

Statement of Truth

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

Signed: 

Name: SIMON JAMES

Date: 17/04/2018

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 OF SIMON JAMES

EXHIBIT SRJ/1

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 SIMON JAMES

EXHIBIT SRJ/2

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 SIMON JAMES

EXHIBIT SRJ/3

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 SIMON JAMES

EXHIBIT SRJ/4

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 SIMON JAMES

EXHIBIT SRJ/5

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 SIMON JAMES

EXHIBIT SRJ/6

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 SIMON JAMES

EXHIBIT SRJ/7

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 SIMON JAMES

EXHIBIT SRJ/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 SIMON JAMES

EXHIBIT SRJ/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 SIMON JAMES

EXHIBIT SRJ/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 SIMON JAMES

EXHIBIT SRJ/11

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 SIMON JAMES

EXHIBIT SRJ/12

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 SIMON JAMES

EXHIBIT SRJ/13

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 SIMON JAMES

EXHIBIT SRJ/14

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 SIMON JAMES

EXHIBIT SRJ/15

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 SIMON JAMES

EXHIBIT SRJ/16

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

The London Borough of Redbridge
Claimant

And

James Reilly & Ors
Defendants

WITNESS STATEMENT OF SIMON JAMES

Fiona Alderman
Head of Legal Services
London Borough of Redbridge
Town Hall
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Ilford Essex
IG1 1DD

REF: ATR/RC-017599

E: adam.rulewski@bdtlegal.org.uk
P: 0208 724 8379

Claimant

S KAYE

First

Exhibits: SK1-6

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 Sarah Kaye

I, Sarah Kaye, Senior Redbridge Enforcement 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.

The purpose of this statement is to confirm my involvement in recent unauthorised incursions within the London Borough of Redbridge.

July 2017 – Kearly & Tongue Playing Fields

2. On the 20th July 2017 whilst conducting my duties I received reports of possible travellers at Kearly & Tongue Playing Fields, Royston Gardens, IG1 3SY. In response to the report I attended the site and on arrival I found that the lock to the entrance gate had gone and the height restriction was open. I could see from the road that there were several vehicles and caravans over the far side of the playing fields where the playing courts were. Whilst I was there 3 males approached the Council vehicle I was in, I spoke to the eldest male who was in his 60's and spoke with an Irish accent. I identified myself as a Senior Enforcement Officer of Redbridge Council and he confirmed that he was related to the vehicles and caravans on the playing fields.

3. I returned to the office and sent notification emails to the internal and external contact groups. I arranged a welfare visit that evening that included attendees Adekunle Adewumi London Borough of Redbridge Housing Officer, Lisa Sage LBR Social worker for Children Services and Mbuete Mido LBR Social Worker for Adult Services and Jules Onalaja Redbridge Enforcement Officer.

4. We attended the unauthorised encampment at that time I recorded there to be 7 Caravans, 4 vehicles, Black Mondeo EN08BYR, Blue/Grey Vauxhall GY58WZV , White & Black Ford Transit HK53ZWH and a Motor Home registration not recorded and approx. 8 persons present. Exhibit a typed version of my original form at [Exhibit SK1] which is the first visit form. We conducted the Welfare Assessment where the families informed us their family names were Ward & McDonough. At [Exhibit SK2] are the Welfare Forms. I made the travellers aware at the time of the welfare

visit that they were trespassing and were not authorised to enter and camp on the land. The travellers were asked if they had any Health, Social Housing issues or needs to which the travellers declined.

5. On my return to the office I briefed my senior manager John Richards and the decision was made to proceed with the eviction process, see [Exhibit SK3]. I returned to the unauthorised encampment and I informed the travellers and the main representative from the group who had identified himself to me as John Ward that they were trespassing on Council owned land and were there unlawfully I served him with a notice instructing them to leave the land no later than 5:00pm on Saturday 22 July 2017 [Exhibit SK4.]
6. On the 22nd July 2017 at 15:15 I inspected the unauthorised encampment with Steve Whiting LBR Enforcement Officer to assess whether the travellers looked likely to comply with notice to leave by 5pm; one of the males approached me and informed me they would not be leaving.
7. I returned to the office and contacted the Metropolitan Police Service requesting they serve a section 61 Criminal Justice and Public Order Act 1994 if the travellers had not left by 17:00 hours. I attended the unauthorised encampment at 17:00 hours with Enforcement Officer Steve Whiting to assist the Metropolitan Police who were serving a section 61 Notice.
8. On the 24th July 2017 I returned with Senior Enforcement Officer Tracy Scott, Laura McDonald LBR Children Services and 5 LBR Enforcement Officers to support the Metropolitan Police Service in the serving of the Sec 61 Notice it was agreed that the police would give the travellers until the 25th July 2017 to leave they failed to comply. On the 26th July 2017 I

attended the unauthorised encampment with Senior Enforcement Officers Tracy Scott, Simon James, Stephen Lewis and 4 Enforcement Officers to support Sergeant Clarke and the Metropolitan Police Service enforce the section 61 Notice.

9. Following the eviction Tracy Scott and I inspected the playing courts where the travellers had set down their caravans and vehicles. I could see fly tipped waste consisting of white goods, cardboard, domestic waste. We then went further on that led down to the River Roding where I could see human excrement and used baby wipes all along the river bank caught in the foliage and photographed it [Exhibit SK5.]

September 2017- Wanstead Rugby Football Club

10. On the 14th September 2017 I attended Wanstead Rugby Club with my colleague Tracy Scott to serve eviction order and investigate reports of fly tipping. Whilst there I observed a large fly tip along the Roding Valley Park located behind the unauthorised encampment consisting of builders waste and house hold items that looked to be from house clearances. I understand Tracy Scott, in her witness statement, addresses these issues..

11. On the 15th September 2017 I attended a Police Briefing at Woodford Police Station in relation to enforcing an Eviction Order for travellers unlawfully encamp at Wanstead Rugby Football Club, Roding Lane North, Woodford Green, IG8 8JY. Senior Enforcement Officer Tracy Scott and I attended the unauthorised encampment to ensure that the travellers were complying with the eviction order Ms Scott had obtained the previous day. When we arrived there were a number of persons, caravans and vehicles still on site. We went from vehicle to vehicle

advising the travellers to leave immediately as the Bailiffs and Police were attending. We returned to our vehicle and waited in the middle of the field when we saw vehicle WX53VHG an LDV open back truck white with a long orange light on the roof of the vehicle and the rear was dark brown with the sides made up of wood, see [Exhibit SK6]. It was full of waste being driven by a white male in his 30's with a female passenger blonde long hair in her 20's the vehicle drove across the field from the entrance stopped to speak to one of the travellers I approached him in our vehicle and opened the window and asked the driver to produce his waste carrier's license he failed to do so.

12. He then drove the vehicle full waste of towards a dead end that lead to Roding Valley Park trail and a wooded area where there was a large amount of fly tipping that had accumulated since the travellers had arrived. He reversed the vehicle into the area and I proceeded to follow him. When he realised we had followed him in and blocked his exit he stopped and did not continue to proceed to fly tip the waste of the back of his caged vehicle. Instead he shouted for us to move back to let him out and stuck both his middle fingers up at us. We drove back and he speed of over the field and out of the Rugby grounds.

13. At approx. 12:00 The Metropolitan Police Service arrived and informed the travellers passers that it was time to go and that the bailiffs had been instructed to assist. The majority of the travellers began to pack up and eventually they all evacuated the site with the last ones leaving at approx. 14:30

September 2017 – Hurstleigh Gardens

14. 15th September 2017 following the eviction of the unauthorised encampment at Wanstead Rugby Club I attended Hurstleigh Gardens with Tracy Scott and officers from LBR Housing, Children's and Adults services in response to reports from the Met that the trespassers had relocated there. On arrival it was clear that the trespassers present were the same trespassers we had evicted earlier from Wanstead Rugby Club.

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

Statement of Truth

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

Signed: 

Name: 17-4-18

Date: S. Wayne

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 SARAH KAYE

EXHIBIT SK/1

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 SARAH KAYE

EXHIBIT SK/2

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 SARAH KAYE

EXHIBIT SK/3

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 SARAH KAYE

EXHIBIT SK/4

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 SARAH KAYE

EXHIBIT SK/5

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 SARAH KAYE

EXHIBIT SK/6

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 SARAH KAYE

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

P: 0208 724 8379

Claimant

H Toor

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 HARVEIL TOOR

I, HARVEIL TOOR, Senior Redbridge Enforcement 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 the Manager of the London Borough of Redbridge Enforcement Team. This is a uniformed team of officers supported by Senior Enforcement Officers who work a shift rota, including weekends. Their duties are to patrol the Borough and respond to calls concerning fly tipping, Anti-social behaviour and offences under the Environmental Protection Act 1990. In April 2017, the Redbridge Enforcement Team took over responsibility for the London Borough of Redbridge's ('LBR') Unauthorised Encampment Protocol. Prior to this, responsibility for unauthorised encampments in LBR vested in the Emergency Planning Team. The team is tasked to respond to incidents of unlawful encampments by travellers within Redbridge Borough.

24 August 2017 – Valentines Public House

3. On 24th August 2017, I was informed by the Redbridge CCTV Control Suite that travellers had broken into the site of the old Valentines Public House, 27-37, Perth Road, Ilford via the main gate. The CCTV evidence showed a number of tipper Lorries driving onto the site. This location is of concern as it is near the main road hub in and out of the Borough. During the day the Enforcement Team received a number of calls from disturbed residents who live in the high rise flats across the road. They were witnessing fly-tipping offences on the site and complaining about noise nuisance. I contacted Redbridge Planning Enforcement who provided details for HTA Design who had contracted works to Tide Construction for the site. I contacted Mr Roman, Head Architect for Tide Construction, he stated that he would inform HTA Design, at that time he could

not provide time lines for securing the site or arranging removal of the fly-tipped rubbish.

24 August 2017 – Doctor Johnson Public House

4. On 24th August 2017, complaints were received from Redbridge Council Control Centre and the Police that travellers had entered the site of the old Doctor Johnson Public House, Longwood Gardens, Clayhall, Ilford. At 2.30pm, I attended the site, in company with Mr Stephen Lewis, Senior Enforcement Officer. On arrival I saw from the side fencing that a number of caravans and cars were on the site. We were met by Mr Dalbir Sangha the land owner. He informed us that there was a Bank Holiday coming up and he wanted them off his land, he was going to make cash payment for them to leave. I am informed that a payment was made and the travellers left the site later that night. I am not aware of the specific details of the transaction.

14 September 2017 – Shannon Centre

5. On 14th September 2017, I was informed that overnight travellers had broken into the site of the Shannon Centre (Berties Night Club) 14, Cameron Road, Seven Kings, Ilford IG3 8LA. I contacted Mr Johal, Site Manager he advised me that due to an expensive drill which was on the site they were prepared to pay the travellers £2,000.00 to leave. I am told this course of action was taken.

20 September 2017 – Cranbrook Primary School

6. On 20th September 2017, I was informed that travellers were on Port of London Authority (PLA) land behind Cranbrook Primary School. In company with Stephen Lewis, Senior Enforcement Officer, I attended Cranbrook Primary School and met with Miss Darshan Kaur, Acting Head Teacher. We informed her of the eviction process and advised that the school should consider cancelling evening /weekend sessions and bookings whilst the travellers were on site. The (PLA) site is now a construction site owned by a Sikh Charity Group based outside of London, the site will be developed into a sports hall and grounds. I spoke with Mr Johal the Charity Chairman and Mr Hari Athwal their legal representative based in Redbridge. Mr Athwal advised me that legal proceedings would start for an eviction, the travellers were evicted on 30th September 2017.


19 October 2017 – Beal School

7. On 19th October 2017, I was informed that overnight travellers had broken into the main school grounds of Beal School. However, due to an early intervention by the school caretaker the travellers left the school grounds and parked on the grass verge next to the school on Woodford Avenue. This is Transport for London Land who were informed by Redbridge Enforcement Team, throughout the day I updated the School Head Teacher Mrs Terse Wilmot. On 20th October

2017, I was informed that travellers had entered a site on Wanstead High Street. On 24th October 2017, a Section 61 notice was served on the travellers by Police under the Criminal Justice and Public Order Act 1994 they left the site at 4.20pm. Senior Enforcement Officer, Tracy Scott and I were present with the landowner Mr Saab Sangha and the police during the eviction. Once the travellers had left the site was secured. The fly-tip left by the travellers took 13 days to remove due to the bulk of waste which had been dumped. Mr Saab Sangha reported the cost of £8,000.00 for removal and disposal. On the 19th October 2017, I was notified of travellers on Woodford Trading Estate. I spoke to Jessica Maryson Project Manager of JLL. She informed me that the travellers have broken into an empty office building and are claiming squatters rights, therefore the eviction process will be delayed

Statement of Truth

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

Signed: 
Name: MARVIN TAOIL
Dated: 20/11/18