

4. On the 4th September 2017, the club notified all relevant authorities of the trespasser incursion in line with our operating procedures. We engaged a security contractor to provide 24-hour security for our Clubhouse and the storage facility. I have been made aware that on the 5th September 2017, the security guard on duty was asked by the Travellers to unlock the height restrictor on the gate at the main entrance outside the Clubhouse. He initially declined but was threatened with extreme violence if he did not comply. As a result of this intimidation and fear the guard unlocked the gate, thereafter the Travellers used this entrance to access our site and grounds. I have no knowledge of the details of this security officer. I understand that officers from Redbridge Council were in contact with the security company.
5. During the next week trespasser vehicles would come and go within the site, their cars taking people in and out and vans bringing assorted rubbish and waste on our site and dumping it. The younger members of the trespasser community were in the habit of using the 1st team and junior pitches as a race track for vehicles and would continue with this activity until late at night with headlights blazing. We were advised by the Police not to approach the Travellers or attempt to prevent them from either leaving or returning to their caravans. The Travellers were dumping rubbish and waste into our boundary hedges, around the

whole of the site and in even greater bulk further down towards the M11 motorway, where there is a nature trail and community path along the Roding valley.

6. During this period of some 7 days, members of the local community frequently contacted and visited us to enquire as to what was happening in respect of eviction and to offer us support. There was little or no eviction activity at this time and we began to consider our options. During this time the younger elements within this traveller group. Travellers were routinely aggressive and threatening when they approached the gate to leave our ground. I have been advised that a number of local residents had also been threatened in the streets and around the local area. They were advised to report such matters to the police via the 111 system.
7. When alone on site during the late evening and early morning the security guards on duty were routinely threatened and advised not to hinder the movements of the Travellers in any way. During the second week of the Travellers occupation, further vehicles arrived and made their way on site to join the others. It was decided that the Club needed to expedite the eviction procedure because of the serious damage to our pitches and the consequential financial losses we were suffering.
8. On the 11th September 2017, a Solicitor's letter was sent by us to the London Borough of Redbridge. On the 14th September 2017, Redbridge

Borough obtained a Section 78 Order under the Criminal Justice and Public Order Act 1994. The Travellers finally all left the site by the 15th September 2017.

9. During the period from the 4th to the 15th September 2017, two senior and one junior pitch had been unavailable for use. The Travellers had used two of our pitches including the 1st team pitch for access to the third pitch where they were unlawfully encamped. The vehicle tyre damage to the playing areas was significant. Rubbish of all kinds had been dumped around the perimeter of the pitches and on the pitches. The local residents and children had been denied access to most of the recreational areas, which were off limits during this period due to fears and concerns for their safety. The area around the Clubhouse and in particular around the entrance gate was felt to have been particularly unsafe at the time, Travellers were coming and going at all times, exhibiting overtly aggressive behaviour to anyone who looked at them.
10. We had a number of people and organisations that had hired our Clubhouse for various events and activities over this period, all were notified of the problems and at least one provided their own security within the Clubhouse as a precaution. Although the Travellers had departed on the 15th September 2017, they left rubbish and waste behind, much of which constituted a biological hazard. This waste included baby's dirty nappies, soiled toilet paper and wipes. Club

members instigated the voluntary process of clearing away rubbish that had been thrown on our pitches and into the hedgerows, stacking building waste into larger piles and household waste into black bags. During this process we found and cleared multiple dirty nappies and soiled clothing together with rotting food waste.

11. Redbridge Council took responsibility for the final site clearance, including the main fly-tipping alongside the M11 motorway, which had been accessed via our ground. We were grateful to the Council for their cooperation during this period, as the clear-up needed to be done by specialist contractors with the appropriate machinery and expertise. The contractors began their clean-up operation only to find that some of the waste contained asbestos. The operation was stopped for a few days for the material to be safely disposed of. The site was finally cleared on the 28th September 2017, we were then satisfied that there was no longer any hazardous or dangerous waste left on our playing fields and recreational areas.
12. During this period we lost the use of pitches and had employed 24 hour security. The tangible cost to the Club was £300 in respect of the marking of additional pitches and subsequent repair of the first team pitch. A cost of £4,650.00 was incurred in respect of the 24 hour security operation and purchase of new padlocks. The pitches took two

weeks to recover from the constant driving and motor sport activity upon them.

13. As well as the monetary costs there were other aspects to be taken into account. The time spent on a voluntary basis by club members who provided support for the security guards, and those who were working at the Club during its opening hours and lettings and the time spent by Club members clearing the site of some very unpleasant rubbish. Opposition Clubs that visited us during this period accepted the risks and provided mutual support and assistance. Our normal business model was severely interrupted and emergency procedures adopted.
14. The local community lived with a constant degree of concern due to the consequences of the Travellers occupation of our grounds. Apparently, one resident cancelled a holiday so that he could guard his property, which was separated from the Travellers on our site by only 20 metres and a flimsy fence. Elderly residents were denied the dog walking areas by their back gates, children and young adults were unable to play locally. A woman was threatened and abused when she innocently impeded one of the Travellers vehicles in a local street.

15. As a Club we have upgraded our procedures and security following this event. As a taxpayer within the Borough and on behalf of our Club we will support Redbridge Council in their application to seek an injunction to prevent this conduct in the future.



STATEMENT OF TRUTH

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

Signed: _____



Name: _____

MICHAEL JOHN CALVERT

Date: _____

10/04/2018

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 MICHAEL JOHN CALVERT

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
N Chaudhary
First
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Redbridge

Claimant

and

(1) MARTIN STOKES & 99 OTHER NAMED DEFENDANTS

(101) PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF NOWSHAD CHAUDHARY

I NOWSHAD CHAUDHARY, resident of Ilford, make this statement in support of the Claimant's application for an injunction against the above named defendants and WILL SAY AS FOLLOWS.

1. The facts stated in this witness statement are true, unless otherwise stated. Those facts which are not in my direct knowledge are true to the best of my knowledge and belief. I have lived at my current address for about 11 years. In August 2017 a group of travellers including about 8 – 10 caravans parked up in the Ford Sports and Social Club sports field, directly behind my rear garden for about 2 days. They left a significant amount of mess, which seemed to consist of

everyday rubbish. The rubbish was spread all over the field and was quite unsightly. After the travellers left I recall that it took contractors 3 to 4 days to clear it up and to take it away. I was concerned that my home may be broken into.

Statement of Truth

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

Signed:  _____

Name: Alwina's Crossley _____

Dated: 11/4/18 _____

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 NOWSHAD CHAUDHARY

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
J Bryant
First

Date:

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

BETWEEN

CLAIM NUMBER:

THE LONDON BOROUGH OF REDBRIDGE

Claimant

and

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

Defendants

WITNESS STATEMENT OF JULIE BRYANT

I Julie Bryant, Head of Registration and Celebratory Services/Superintendent Registrar, Registration Services, Revenues, Benefits and Transactional Centre for The London Borough of Redbridge, Redbridge Town Hall, 128-142, High Road, Ilford, Essex IG1 1DD WILL SAY AS FOLLOWS:

1. I make this statement in support of the Claimant's application for an injunction against the above named Defendants. The facts stated in this statement are from my own knowledge unless otherwise

stated. Where the facts are not in my direct knowledge, they are true to the best of my knowledge and belief.

2. My role is to carry out the duties of the Superintendent Registrar for Births, Deaths and Marriages under the Registration Acts and to manage the delivery of Registration Services in the Registration District under the direction of the Proper Officer for Registration. Prior to October 2017, the Register Office was located at Queen Victoria House, 794, Cranbrook Road, Ilford IG6 1JS. This is a grand stately house standing within its own grounds. The house has played a considerable role within local history, originally part of Dr Barnardo's, Children's Homes, later a hospital and then more recently housing the Redbridge Register Office. The building is locally listed by the London Borough of Redbridge, meaning that it is of architectural or historical interest, and contributes to the character of Redbridge.
3. On Thursday 14th September 2017, I saw that travellers had set-up an unlawful encampment on the land adjoining our building known as Queen Victoria House. This land is owned by Tesco. Later that day when my colleague Helen Condon and as we were leaving work we witnessed two boys spraying paint on a car belonging to my colleague Ruksana Ali. The car was parked in the car park within the grounds of the Registrar's Office. We followed the boys; they went

through a gap in the fence to where there were a number of caravans on the traveller site. One of the travellers cleaned the paint off of Ruksana's car and stated that they were there for a funeral in Enfield and would be leaving in the morning. I went over to the site where they were encamped on the Tesco land and spoke to the group, adults and children. I asked who is responsible for the damage to the car next door, some of them then went over and cleaned the car, I can only assume they felt guilty. I reported the traveller's occupation of the site to the Redbridge Contact Centre and Mr Richard Crossland the Council Facilities Manager, I was concerned about the security of our site and building.

4. When I left the grounds to Queen Victoria House I locked the barrier and set the alarm, I felt that someone needed to be on site overnight to ensure the security of the building and the land.
5. Ruksana had previously telephoned the Police on the 101 system, as the travellers were lighting fires on the land; the police were not prepared to attend and they said it was a fire brigade issue. Helen had also contacted Tesco's store nearby, they were aware of the travellers and apparently were going to Court to have them removed
6. I later received an email from Richard Crossland, Council Facility Manager. He stated that he had arranged for a security officer from

Charter to remain on the site overnight and remain in place until the travellers were moved on. I produce an invoice detailing the security costs as [Exhibit JB/1]. He had also contacted the Police regarding the fires and the Redbridge Enforcement Team. The travellers had set-up camp on Tesco's land, not Council owned land; however, the land is adjacent to Queen Victoria House. I informed Redbridge Media and Communications Team for their information. I arranged for a text message to be sent to all my officers advising them to be aware when they arrived for work the next morning, I had concerns for their safety and security.

7. On Friday the 15th September 2017, I arrived at work at 7.30am; I noticed that the travellers were still on the adjoining land. I advised Richard accordingly. The situation worsened throughout that day, with children from the traveller site trying to break into the Electoral Registration container in the car park and being a general nuisance. After one of them threw a stick at one of my officers I made the decision to close the door of our building to the public, and deal with our customers by asking them to ring the bell to enter. I took this decision to ensure the safety of staff and customers, as I had no assistance to stop the travellers/children entering our building and causing further problems for staff and customers. Adults from the site

were also entering the grounds and when asked what they were doing, they advised us that they were just looking around.

8. The travellers were evicted from the site just after 5pm on Friday 15th September 2017. The impact of the traveller's incursion alongside our building was considerable. It was a fearful and stressful time for my staff and me. I had grave concerns for the safety of officers, staff and our customers, also the security of the building and the site, which is vulnerable as it is a place that is open to the public. I was worried the travellers would get onto our grounds and that we would have to suffer the associated issues related with removing them. The Registration of Births, Marriages and Deaths is a statutory requirement within the Borough. It should present a solemn and respectful place. Clearly, the incursion caused upset and disruption to Borough residents and visitors.

Statement of Truth

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

Signed: Julie Bryant

Name: JULIE BRYANT

Date: 24th April 2018

IN THE HIGH COURT OF JUSTICE

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 JULIE BRYANT

Fiona Alderman
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REF: ATR/RC-017599

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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 JULIE BRYANT

Exhibit JB/1 – Charter Security Invoice

Claimant
D Fidderman
First
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Redbridge

Claimant

and

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

Defendants

WITNESS STATEMENT OF DEREK FIDDERMAN

I, DEREK FIDDERMAN, resident of Woodford, make this statement in support of the Claimant's application for an injunction against the above named defendants and WILL SAY AS FOLLOWS:

1. The facts stated in this statement are from my own knowledge unless otherwise stated. Where the facts are not in my direct knowledge, they are true to the best of my knowledge and belief. I have lived at my current address since 1935. Towards the end of April – early May 2017 about five or six caravans settled around a football pitch behind my home. The football pitch previously belonged to Woodford Town F.C. I believe that they stayed for about six days and left on the May Day Bank Holiday. The travellers left two large mounds of rubbish comprising of building materials such as plaster board and brickwork. The rubbish was left either side of one of the goal posts.

2. I also feared that my home may be burgled when the travellers arrived so we decided to lock the garage up properly. A few months after this first group of travellers left, another group arrived but this time they settled on the Ray Park green space opposite my home. The second group of travellers arrived early August 2017. In this instance there were about eight to ten caravans that formed a big ring. When this second group of travellers moved on (after about five days) they appear to have left the park clean.

Statement of Truth

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

Signed: 

Name: D. J. FIDDERMAN

Dated: 9-4-2018

**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 DEREK FIDDERMAN

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@bdlegal.org.uk
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Claimant
A Clarke
First
Exhibits: AC/1 to AC/2

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 ANDREW CLARK

I, ANDREW CLARK, resident of Redbridge, make this statement in support of the Claimant's application for an injunction against the above named Defendants WILL SAY AS FOLLOWS:

1. I have lived at my address in Redbridge for four years. On or around 26 September 2017 a large group of travellers comprising of about twenty caravans and other vehicles arrived and settled on the green space directly behind my home. The green space is known as Roding Valley Park. The pathway to the park is adjacent to my home. Their vehicles made a lot of noise coming and going at night. Some of the caravans settled directly behind my rear garden fence and I could hear talking throughout the day. The caravans stayed for at least four days and left on or around 29th September 2017. When they left there was a large pile of building materials and rubbish left on the green space behind the tennis courts. I estimate that the rubbish mound was around four feet high and about

ten feet wide. I took two photographs of the area where they settled, which are now shown to me marked 'Exhibit AC/1' and 'Exhibit AC/2'. Photograph AC/1 shows the settlement of caravans after they arrived. Photograph AC/2 shows the aftermath of the area of settlement after the Travellers left. Photograph AC/2 shows an abandoned van, which stayed there for two to three weeks until it was removed. This photograph also shows substantial damage to the grass showing ruts in the grass, which has turned to mud. The rubbish mound is not shown in these photographs.

The rubbish mound was to the left of photograph AC/2 beyond the tennis courts. There was also a significant quantity of human excrement dumped on the grass, which stunk for weeks. I was with my two children in the park when I took photograph AC/1. I was approached by two male travellers. They asked me "What are you doing?" I explained that I was taking photographs. They then said "Why?" and "You can't take pictures of us!" They said "You don't have a right to do that" and "You take more pictures and you will see what happens to you!" I asked them "Is that a threat?" to which they replied "Yes". Following the threats that I had received from the Travellers I called the Police.

Statement of Truth

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

Signed: A Clarke

Name: ANDREW CLARKE

Date: 10/04/2018

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 ANDREW CLARK

EXHIBIT AC/1

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 ANDREW CLARK

EXHIBIT AC/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 ANDREW CLARKE

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Claimant
S Hahn
First
Exhibits: SH/1
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 STEPHANIE HAHN

I, Stephanie Hahn, Centre Manager for Ashton Playing Fields, 598, Chigwell Road, Woodford Green IG8 8AA, 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. Aston Playing Fields is a large outdoor leisure facility for the public and local community use. We have a 400m athletics track with full hammer cage, shot put area, a javelin area and 2 sand pits. Our other

outdoor facilities include an 'Astro Turf', large grass area, where we have 3 grass football pitches and two training hammer cages. This still leaves plenty of open space on site for people to take a leisurely stroll, walk their dog and for all to enjoy the facilities with their friends and families. We have a small building on site, which houses a gym, changing rooms and toilets. Another building has a large hall space and offices attached to the side of the building. This hall is predominantly used by a kindergarten and an after school club on weekdays. We have two large car parks (upper and lower) the lower car park can be locked when not being used by customers. Ashton Playing Fields is a valued community asset for local residents and visitors.

3. On Saturday the 5th August 2017, just after 4pm, a group of travellers arrived at our facility and set-up an unlawful encampment. This was the first I knew of them being in the area, we had no pre-warning that there were any travellers in the Borough, so this left us unprepared and vulnerable. They arrived on that Saturday during our weekend opening hours; we are normally open 9am – 5pm. At the time I was in the office cashing-up when I heard something loud and fast coming in over the speed humps. I looked out the window and saw a car towing a caravan drive past, accompanied by two other cars and caravans close behind. I realised what might be happening and immediately run across to the opposite building to alert another member of staff who was cleaning. He came with me; I could hear and see the travellers messing with the lock on the lower car-park gate. I had locked this gate half hour prior to their arrival due to an early football finish. I ran up to them to try and stop them breaking the lock off. However, I was too late as by that time they were forcing the gate open to gain access to the lower part of our facility, which is the only

direct way onto the open fields. I tried to pull the gate shut but I couldn't win against the sheer number of people struggling against my staff member and myself. All of them were out of their vehicles; I stood in front of the gate, which was wide open.

4. I knew I needed to get hold of someone to report the matter and get some support on site to protect the facility from potentially being torn apart by their cars and caravans. The man from the first car and caravan, who had parked in front of the gate, got back into his car and started it up. My staff member was clear and out of the way, it was just me standing in the middle of the open gate. He started to drive his car at me, although this wasn't with a mass of speed, he drove up until his bumper made direct contact with the bottom half of my thighs, this later resulted in bruising. I honestly didn't anticipate this happening; I stayed in front of the lower car park gate, continuing to stop them accessing this area.
5. I called the police and informed them of the incident and all that had happened. The police eventually arrived, by that time the caravans had moved up, blocking all visibility of me from anyone coming into the facility. The travellers had demanded that I let them into the lower car park. I called Mr Andy Jones, my Leisure Facilities Operations Manager (as instructed in our operating procedures if such an event occurred). He contacted another Senior Manager, Ruth Pinner, who lives locally; She attended calling Redbridge Council Enforcement on the way in to the site. Obviously at that time I couldn't move from my position to get any contact numbers for anyone else. I had to call in a Duty Manager to assist with a party we had on in the hall at the time. However, it was later decided that this party be cancelled and everyone was moved off site for their own

safety. This was a precaution due to the aggressive behaviour being displayed by the travellers upon their arrival.

6. Whilst I was waiting for another Manager to attend, more cars and caravans started to turn-up, by that time there were 16 in total. I had somehow managed to secure the gate and close it, but could not lock it as the chain and padlock had been taken. Instead I stood in front of the closed gate. All of the men from the traveller convoy, about 16 of them were out; some of them jumped the fence and tried to push me out of the way from behind. They gripped my hair and I caught my foot under the gate, when I cried out 'ow' they stopped trying to move me.
7. When the police had arrived they told me that they could not do anything about the person who drove the car into me. I couldn't identify the driver, due to the fact I was concentrating on the bonnet of the vehicle getting closer to me, even though I could identify the vehicle.
8. Ruth Pinner, Leisure facilities Manager arrived shortly after the police, who by this stage were going to leave. I asked them to stay until someone else was on site. Redbridge Enforcement Officers arrived shortly after Ruth, the travellers appeared to calm down a little and become more reasonable to talk to. Due to safety concerns over the traveller incursion we had to cancel the late night party, which had been booked. This was a massive disappointment and inconvenience for the customers as it was Mehndi party for a forthcoming wedding on the following Monday.
9. The police had advised us that all staff and customers should leave the site as soon as possible, we did not know how the travellers were going to be, based on the behaviour they had already displayed. We lost income as we were obliged to refund the entire party costs of

£977.00 as clearly, the situation was due to no fault of theirs. There was nothing else we could do that day as the travellers had entered the site. We had no option but to arrange for security to attend and monitor the site and lock up the facility, except the main gate, as we could not lock them in. The travellers had said they wanted to stay in our lower car park, but when this was opened for them they forced their way down onto the lower fields and camped up in front of our training hammer cages. The travellers stayed from Saturday 5th August 2017 until Friday 8th September 2017.

10. Throughout their stay the traveller children run riot, removing safety ropes and poles from the hammer throw area on the track and hiding them or throwing them. Dirty nappies were left on the track, as well as household rubbish, they also allowed their dogs to run around the centre. Their children were spitting and kicking windowed doors to the hall to try and get into our holiday club. They jumped a fence to the kindergarten playground and were climbing onto cars. We had to speak with the adults on a regular basis to keep the children off the track and about their children's unruly behaviour.
11. The traveller's cars and vans caused damage to our grass areas as they were continuously being driven in and out of the centre. They caused tiles to rise all around the 'Astro Turf' as they were driving over the tiles, which are only designed for foot traffic. The rubbish and waste they dumped soon started to mount up, bags and bags of rubbish was dumped by the white building on the back of the track. At that time we could not see behind their caravans as they were parked close against the trees and bushes by the M11 motorway. Due to the travellers being on our site we had to protect our assets as much as possible.


12. We did not set-up high jump, pole vault or any other athletic events for regular club users, or use the golf buggy we have on site to get around the ground quickly if required in an emergency, or to transport equipment and conduct maintenance. Therefore we had to walk round to do the daily checks, walk the fields, check the pitches, litter pick the grass pitches after football and empty bins far down in the facility. These tasks took considerably longer putting a lot of pressure and extra workload on our staff.
13. On the last night of their stay Friday 8th September 2017, the travellers ripped down part of our training hammer cages to steal the metal wiring. They left after 5 weeks of unlawful occupation, a large mass of rubbish was dumped on our site, domestic waste and fly-tipped trade building waste. We still had concerns after the travellers had left our site; ~~they~~ ^{*-B} had set up ~~another~~ ^{-B} illegal encampment nearby at Wanstead Rugby Club. Apparently, they had been served with eviction notices and we were fearful as it was rumoured they might ~~try and return to~~ ^{move onto-B} our site. I arranged security on our main gate to try and prevent any further traveller access.
14. On one occasion when I was on site, we had both front gates locked, with the security guard on duty only letting in customers. A van pulled-up with 3 travellers inside, the men demanded to be let in, the security officer said no. He was standing out by the gates after letting a customer in, they drove their vehicle at him pinning him up against the gates repeating this action a couple of times. I had so many security officers on duty on various days I don't remember which one it was. When I checked on the guard, the travellers had left but had apparently threatened to return. I called in more security to protect our facility, fearing their return to our site.

* as another group
-B

15. As a result of the travellers being on our site we had a lot of complaints from customers and local residents. They questioned the length of time they were here, complaining about the rubbish and mess they had dumped and the behaviour of their children and dogs. It caused considerable disturbance to the day-to-day running of the club for staff and residents who felt uneasy and uncomfortable.
16. We had a summer activity camp arranged throughout the school holidays but due to the travellers being on site parents did not book their children in to attend. The activities were to be held on the 'Astro Turf', which is near to where the travellers were situated; they did not feel their children would be safe on site. A lot of our regular customers stopped coming down to use the track during this period due to the disruptive behaviour of the travellers and fears for their safety. This had a detrimental effect on our reputation, which even now we are trying our best to rebuild.
17. The costs of the unlawful traveller incursion were substantial. Total security costs in August and September 2017 were £4658.60 and 4140.00 respectively (total cost £8,798.40) which I produce as [Exhibit SH/1]. Height barrier cost (to prevent reoccurrence) £4,370.00. Staff costs to clean up waste and mess dumped £507.52. Refund of cancelled party booking £977.00. The total monetary cost was £14,652.92.
18. There was additional burden on the centre, my staff and myself due to the strain and stress of an extra workload caused as a result the 34 days of unlawful encampment by these travellers. Also the damage, disruption and concerns suffered by our regular customers and local residents was significant.

Statement of Truth

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

Signed: 

Name: Stephanie Hahn

Dated 18/04/2018

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 STEPHANIE HAHN

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

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 STEPHANIE HAHN

Exhibit SH/1 – Coverdale k9 Security

Services Limited Invoices

Claimant
M Hajitoffi
First
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Redbridge

Claimant

and

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

Defendants

WITNESS STATEMENT OF MICHAEL HAJITOFFI

I, Michael HAJITOFFI, resident of Redbridge, make this statement in support of the Claimant's application for an injunction against the above named Defendants..

1. I have lived here since 1979. In August 2017 1-3 caravans parked in the large Ford Sports and Social Club Sports field behind my rear garden. After about a few days the number of caravans increased to about 13. They stayed for about a week and then left. After a few days a second group of caravans arrived. They stayed for at least a few days. After the first group of caravans left there was a lot of rubbish. There was a

considerable amount of rubbish left also by the second group of caravans who even used tipper lorries. The rubbish consisted of household and builders rubbish. The children were also making a lot of noise, shouting during the day and evening. The adults were also playing Karaoke a few times up to 3am in the morning. It was generally very noisy. At the time of the second group of travellers, a bicycle was thrown into the alley way behind my garage. Just beyond the alley way is a concrete fence adjoining the sports field where the travellers were parked. I was very concerned that the travellers would damage my property or that I would get burgled.

Statement of Truth

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

Signed: M. Hajitofi

Name M. HAJITOFI

Date: 11-04-18

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

The London Borough of Redbridge
Claimant

And

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

WITNESS STATEMENT OF MICHAEL HAJITTOFI

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@bdlegal.org.uk

P: 0208 724 8379

Claimant
M Joseph
First
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Redbridge

Claimant

and

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

Defendants

WITNESS STATEMENT OF MICHAEL JOSEPH

I, MICHAEL JOSEPH, resident of Ilford, make this statement in support of the Claimant's application for an injunction against the above named Defendants
WILL SAY AS FOLLOWS:

1. I am a resident of the London Borough of Redbridge, and I have lived here for over 50 years. In or around July 2017 a large group of travellers settled in the Keeley Tong Sports field directly behind my rear garden. There were about thirty caravans in the group in addition to other trucks and cars. They stayed there for about one week. There was a large six-foot concrete bollard that they dragged away (with a vehicle), and cut metal supports that were intended to stop vehicles entering the field. They made a lot of noise when entering the fields.

2. During the encampment my next door neighbour had their rear fence removed, as it was being replaced, and I believe that this allowed the travellers to then access my rear garden. During the latter part of the encampment, I had two shovels, a garden rake and other garden tools stolen from my back garden.

3. Over the course of the encampment, an enormous amount of rubbish was dumped on the sports field. The rubbish consisted of a lot of building materials, and a number of black bags. The rubbish was strewn right across the right hand corner of the field (at the lower point of the field). I estimate that the rubbish was piled two and a half to three feet high and covered a very wide area.

Statement of Truth

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

Signed: 

Name: MICHAEL JOSEPH

Date: 13 APRIL 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 MICHAEL JOSEPH

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
J Mansfield
First

Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

THE LONDON BOROUGH OF REDBRIDGE

Claimant

and

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

Defendants

WITNESS STATEMENT OF JOANNE MANSFIELD

I, JOANNE MANSFIELD, Administrator, and resident of Redbridge, make this statement in support of the Claimant's application for an injunction against the above named Defendants WILL SAY AS FOLLOWS.

1. The facts stated in this statement are from my own knowledge unless otherwise stated. Where the facts are not in my direct knowledge, they are true to the best of my knowledge and belief.
2. I have lived here for nearly twenty years. My home is situated on the boundary of Roding Valley Park and is close to Wanstead R.F.C. (Rugby Football Club). I recall that travellers parked their caravans on at least two occasions in the nearby fields in 2017. The first group

consisted of seventeen caravans and settled in a field behind my home for around six days in the March/April period of 2017.

3. The second group arrived in around September 2017 and were spread out all over the fields including the pitch of the rugby club. On this second occasion they stayed longer, for about ten days. Initially there were approximately five vehicles, which increased to a total of twenty vehicles (including their caravans). I believe the first and second group were different people. I walk my dog in the neighbouring fields twice a day.
4. In March/April 2017 I was walking my dog when I realised the first group of travellers had set-up camp in the field behind my home. The travellers screamed at me to put my dog on a lead, despite their own dogs running off the lead and causing havoc. When they arrived I was fearful that we might be burgled and we tried to ensure that someone was always at home. When they left there was a large amount of household rubbish left behind in the field. It was spread out all over the field behind my home. Every few steps that you took there was a mound of household rubbish.
5. The second group of travellers arrived around September 2017, which again I came across whilst walking the dog. I walked between two lines of caravans on my normal daily walk when I first saw them. After the first day I tried to avoid that area. I noticed also that there was now a mound of roof slates that had just been dumped on the grasslands. As time progressed more and more rubbish appeared on the route that I normally took including tracks or 'cut troughs'. The rubbish included mattresses, bathroom suites, plasterboards and loft insulation. There were nails sticking out of pieces of wood that could injure my dog or a child. By the time that the travellers left there was a mound of rubbish at least several feet high and at least thirty foot

wide. There is still some rubbish on the grasslands left over from the travellers. The rubbish left by the travellers was hazardous and I could not take my dog for a walk on the normal route.

6. A neighbour of mine, who I normally walk the dog with, told me that the travellers said to him that if you do not put a lead on your dog we will shoot it through the head.

Statement of Truth

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

Signed: _____

Name: _____

Date: _____

Joanne Mansfield
JOANNE MANSFIELD
18/4/2017

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

The London Borough of Redbridge
Claimant

And

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

WITNESS STATEMENT OF JOANNE MANSFIELD

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
M McNally
First
Exhibits: MM1-7
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Redbridge

Claimant

and

(1) Martin Stokes & 99 other named Defendants

(101) Persons Unknown

Defendants

WITNESS STATEMENT OF MICHAEL MCNALLY

I Michael McNally of Ford Sports and Social Club, at Aldborough Road South,
Ilford IG3 8HG WILL SAY AS FOLLOWS:

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.

1. I am the Club Manager of Ford Sports and Social Club, I have conduct of the day to day management of the club and the land and property on behalf of the Trustees of the Ford Sports and Social Club and Ford Motor Company Ltd, who are the registered freehold proprietor of the land. Its title is registered at Land Registry with Title Number BCL110442.
2. I attach a plan, now shown to me and marked 'Exhibit MM/1' marked with two blue boxed crosses, showing the position of the unauthorised occupiers of our land during the two traveller incursions which commenced on Tuesday 22nd and Tuesday 29th August 2017. I produce photographs, now shown to me as 'Exhibits MM/2-7' showing the unauthorised occupation and the fly tip and human waste dumped on our site by the occupiers during the incursions.
3. The property is the Sports and Social Club for the Ford Motor Company Ltd employees, but it is also open to others for private and charitable functions and sports events. It is a very large site which is in daily use; there are always a number of events and activities booked. For example weddings, football/cricket matches, social and charity events. The Sports Club ground gates are unlocked on a daily basis for use by those attending sports and social events. The gates are locked when the club is closed by the on duty steward who padlocks and secures both the entry and exit gates.

4. The first unauthorised traveller occupation took place at approximately 12 noon, on Tuesday 22nd August 2017, I was on duty working in the Club office. I received a call from one of the neighbours to ask if I was aware that there were a number of cars and caravans arriving on the area of ground next to our front gate. I had the blind closed in the office so I had not noticed. When I opened up the blind I could see a number of cars and caravans, they were on our property without invitation or authority. There were approximately 20 caravans and vehicles and an unknown quantity of adults and children and dogs. I immediately telephoned the police by dialling 999 and reported the incident, I was given a reference number CAD355122AUG and told police will attend. I then informed Birgit Kirby of Ford Land and was told that she would contact Karen Neald of Weightman's Solicitors, apparently to arrange a notice to be served on the unauthorised occupiers to see if they would leave without having to obtain a Court Order. Country Enforcement Group was requested to attend to serve a notice under Common Law giving the unauthorised occupiers 24 hours to leave. A Mr Scott Hines on behalf of Country Enforcement Group attended our site. I spoke with Mr Hines he stated that he was familiar with the Ward Family who were on site and advised me and my staff not to engage with them. He stated that the travellers would not leave the property voluntarily and would stay until a Court Order was granted and served. Mr Hines also informed me of an offer put forward by the travellers for me to consider. That if £500 per caravan was paid in cash by the Club they would vacate the site in an hour, Mr Hines advised

against such action as we would be targeted again in the future for such payments. Mr Hines was instructed by the travellers to tell me that they would be in the club bar on Saturday to watch the McGregor/Mayweather fight; they were informed that the club bar would be closed indefinitely.

5. I later collected a parcel from the top of our driveway when I was approached by one of the traveller family members. He asked if the police had been informed, I told him that they had. He said that another 30 caravans were going to join them and that they were going to hold a *"gathering like we have never seen"*. I did not reply and drove off. I parked my car at the top of the driveway to try and prevent further access to our back parking lot, which houses our garage with all our tools and ground equipment. I also wanted to prevent club members who had not seen the club closed signs from going down to the club house.

6. I later returned to my car to move it to allow the G4S security officers access. I saw that my passenger side door and window had eggs thrown at it, there was sputum all over my windows and someone had urinated over the front left of my car. I later witnessed at least four different cars drive over various areas of the ground. I saw two silver cars doing handbrake turns on the field in front of my office; the occupants were screaming obscenities and using offensive hand gestures towards me, which I found very intimidating. The club house was closed while the travellers were on site, we were forced to cancel all our events, this was necessary for our members and visitors safety.

7. We had 2 G4S officers on site 24/7 during the incursion, which cost the club £4631.00. During this period I had numerous calls from local residents asking what action we were taking to evict the travellers, many are elderly and were extremely worried and frightened. I told them to call the police. I informed the police that we had 24/7 security on site and if they received a call to escalate the response. However, they could not guarantee a response time.

8. The Club had a full calendar of events for the weekend of the first incursion, a wedding for 180 guests, two football games, three cricket games and a bowls match. The area that the travellers were occupying is used to accommodate all the extra cars and is in close to a cricket pitch. The Sunday was booked for a charity football game/family event, scheduled for 150 guests using the hall and grounds. A bouncy castle and ice-cream van were all booked with all proceeds going to the National Brain appeal. This event and others would have been impossible to safely control and were cancelled.

9. The second unauthorised incursion by travellers took place at approximately 7pm, on Tuesday 29th August 2017. I was at home with my family when I received a call from our assistant steward who informed me that travellers were unauthorisedly on site. There were a number of events booked for that week and the Bank Holiday weekend. These included a wedding with 180 guests, a Muslim Eid celebration with 180 guests, a 1st birthday celebration along with eight football matches and five cricket matches. Apparently there were approximately 7 caravans and 9 vehicles and an unknown quantity of

unauthorised adults and children unauthorisedly on our site. I immediately telephoned the police and reported the incursion, I was given the same reference number CAD355122AUG as the previous incident from the week before. I again informed Birgit Kirby of Ford Land, who again stated she would contact Karen Neald of Weightman's Solicitors, apparently to arrange a notice to be served. Country Enforcement Group was requested to attend to serve a notice on the travellers under Common Law giving the unauthorised occupiers 24 hours to leave.

10. Mr Scott Hines of Country Enforcement Group attended at 12pm on 30th August 2017, I spoke with him, he stated that these travellers were apparently a different group from the ones a week earlier. Mr Hines served the Common Law notice on the travellers and stated that he would return on the 31st August 2017, with an eviction team. Mr Hines arrived at midday on 31st August 2017, and informed the group that an eviction team would be attending. He was assured by a member of the group that they would vacate by 4pm that day. At approximately 3pm that day he was approached by the leader of the group and informed that they would not leave without a Court Order as the previous Court Order did not pertain to them, as they were a different group. However, they clearly had knowledge of the previous Court Order. Mr Hines again informed me of the travellers offer, that if £500 per caravan was paid in cash by the club the travellers would vacate the property within the hour. Mr Hines again discouraged this action.

11. The travellers had stated that they would be in our bar over the weekend if on site. Mr Hines told them that the bar was closed. I witnessed incidents of fly-tipping on our land and multiple occasions of cars and vans driving to various parts of the fields and defecating. Football goals and equipment were damaged, we were forced to close the club house and cancel all of our events for the safety of our members and visitors. I again had various calls from local residents and neighbours expressing concerns and fears for their safety. These incidents of unlawful traveller incursions caused my staff, me, club members and the local community a great deal of fear, stress and concern. The monetary value incurred by the club I would estimate as £2500.

Statement of Truth

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

Signed: _____ 

Name: Michael McManis

Date: 12 MARCH 2018

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 MICHAEL MCNALLY

Exhibit MM/1 – Site Plan

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 MICHAEL MCNALLY

Exhibit MM/2 – Photographs

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 MICHAEL MCNALLY

Exhibit MM/3 – Photographs

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 MICHAEL MCNALLY

Exhibit MM/4 – Photographs

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 MICHAEL MCNALLY

Exhibit MM/5 – Photographs

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 MICHAEL MCNALLY

Exhibit MM/6 – Photographs

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 MICHAEL MCNALLY

Exhibit MM/7 – Photographs

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

The London Borough of Redbridge
Claimant

And

(1) Martin Stokes & 99 other named Defendants
(101) Persons Unknown
Defendants

WITNESS STATEMENT OF MICHAEL MCNALLY

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.ruiewski@bdtlegal.org.uk
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5

6

Claimant
G PAYNE
First
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN:

THE LONDON BOROUGH OF REDBRIDGE

Claimant

-and-

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

Defendants

WITNESS STATEMENT OF GIUSEPPINA PAYNE

I Giuseppina Payne, resident of Ilford make this statement in support of the Claimant's application for an injunction against the above named defendants
WILL SAY AS FOLLOWS:

1. The facts stated in this witness statement are true, unless otherwise stated. Those facts that are not in my direct knowledge are true to the best of my knowledge and belief.
2. I have lived here for at least 30 years. In around the second week of August 2017 a group of travellers consisting of around 13-14

caravans parked-up in the fields of the Ford Sports and Social Club, which is located directly behind my garden. One of these caravans parked directly next to my wall. These caravans stayed for about 2-3 days and then left. Around a week later a second group of caravans arrived. Again the second group comprised of around a dozen or so caravans. These groups of caravans created what I would describe as a mountain of rubbish by dumping household and building waste. The second group of caravans were using tipper trucks to dump the waste on the sports field. The second group of caravans also stayed for a few days and then left.

3. i thought that the travellers were very messy and were quite destructive, I noticed that they had flattened metal barriers around a car park. The children were quite wild and running riot, they were also playing with the rubbish. I was also concerned about my property in case I was burgled.


Statement of Truth

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

Signed: _____

Name: _____

Date: _____


GIUSEPPINA PAYNE
18/4/2018.

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 GIUSEPPINA PAYNE

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
G Rush
First
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN:

THE LONDON BOROUGH OF REDBRIDGE

Claimant

-and-

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

Defendants

WITNESS STATEMENT OF GARY RUSH

I, GARY RUSH, resident of Redbridge, make this statement in support of the Claimant's application for an injunction against the above named Defendants.


1. The facts stated in this statement are from my own knowledge unless otherwise stated. Where the facts are not in my direct knowledge, they are true to the best of my knowledge and belief.
2. I have lived at my address for twenty-eight years. My partner has lived here for thirty-seven years. Towards the end of April early May 2017 about six to eight caravans settled around the Woodford Town Football Club pitch, towards the rear of our home. The entrance path is directly next to our home, which gives access to the football pitch area.

3. When they arrived, myself and my partner tried to prevent them entering onto the football club grounds. However, they told us that they "Will be getting in" and had already cut the locks off the gate. I found that the Travellers were quite intimidating. Whilst the Travellers were settled on the ground there were about four or five transit pick-ups going backwards and forwards along the path and dumping building materials. When they left there were two large mounds of rubbish that were a complete eyesore. They stayed about four days and left on the May Bank Holiday Monday.

4. As soon as they arrived there was a fear of burglary in the neighbourhood. I even slept in the downstairs conservatory during the four nights that they were here for fear of a crime. A few weeks later after they left, another group of caravans parked in the Ray Park grounds opposite. There were about ten caravans or mobile homes that settled in the park. They were different people to the first group. They stayed in Ray Park for about five to seven days and then left. The second group of caravans in the park did not give us any grief and no rubbish was dumped in the park.

Statement of Truth

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

Signed: 
Name: GARY RUSH
Date: 16/4/2018

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 GARY RUSH

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 THIRSK
FIRST

Date:

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

BETWEEN

CLAIM NUMBER:

The London Borough of Redbridge

Claimant

and

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

Defendants

WITNESS STATEMENT OF STEPHEN THIRSK

I STEPHEN THIRSK, a partner of Thirsk Winton, Solicitors, whose registered offices are at Swan House, 9-12, Johnston Road, Woodford Green, Essex IG8 OXA, 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 have been a long term member and Club Secretary of Bancroft Rugby Club, Buckhurst Way, Buckhurst Hill, Essex IG8 6JD. This is an old established club founded in 1894, originally as Old Bancroftians Football Club, converting to rugby football in the 1920's. The current grounds were acquired in 1968 when the playing fields were laid out and a clubhouse built. The Bancroft RFC is well respected and has good connections with the local community. The club has faced membership difficulties over the years, which have now been overcome to forge a successful business. The club owns the freehold of its grounds which are vested in Trustees. The grounds comprise four full size rugby pitches, separate training area, large car park and a clubhouse. The Club's main success story is the benefit it brings to local youth, rekindling our association and connections with Bancroft's school and many other local schools senior and junior. The club is held in high esteem by the community and local businesses.

3. On the morning of the Friday 28th July 2017, I was contacted by the Club Chairman Mr Robert Youd. Apparently, earlier that morning he had attended the club in the normal course of his duties, to oversee a brewery delivery. He stated that unauthorised travellers had entered our grounds apparently over the previous evening and had set up an illegal encampment. They were parked on our training area, with about 20 vans and an assortment of persons. As a result of their actions and various incidents the police were called and arrived around midday. We made the decision on behalf of the club to immediately instigate

proceedings to secure their eviction. It was my understanding that the travellers were refusing to leave without a Court Order. With the assistance of High Court Enforcement Officers we submitted the necessary papers to the High Court on the afternoon of the 28th July 2017, due to the weekend, we were given an initial hearing the following Monday 1st August 2017.

4. Because of the allegations and threats to persons and our fears for the security of our premises we employed private security officers to protect our clubhouse and premises. We made a decision to cancel our junior rugby training that weekend, this was due to concerns and fears we had for the safety of our young people and staff. On Monday the 1st August 2017, the High Court Judge *Mark* made an order that the 'expedited procedure' was appropriate in this case due to a fear of injury to persons and damage to property. We were given a hearing the next day Tuesday 2nd August 2017 and the proceedings were duly served on the travellers. That same afternoon my colleagues and I appeared with Counsel on behalf of the Club, where the Court granted an Order for Possession with immediate effect. This was duly served at 5pm that day; Enforcement Officers were in attendance and the travellers left by 8pm.

5. The travellers appeared to be well organised and they left in a regimented manner. I am sure that had we not employed the 15 High Court Enforcement Officers the peaceful departure may have been a different story. As it happens there was no damage caused to our grounds or property, save a small

amount of rubbish that we had to clear up. As we chose to go to the High Court and had to bear the cost of security and High Court Officers the club suffered considerable costs and expenses, the whole exercise cost us in the region of £20,000.

6. We have subsequently increased our security by installing CCTV and ensuring the premises and gates are locked, this has incurred further expense. However, we feel it necessary to protect our staff and members and secure our assets. The incursion by travellers was a most unpleasant experience one which we would not like to repeat. I feel had we not had the expertise and resources within the Club to deal with the legal process it would have taken much longer. On behalf of the Club we support any initiative by Redbridge Council to secure an injunction which I feel will benefit our own and other privately owned sports grounds and facilities.

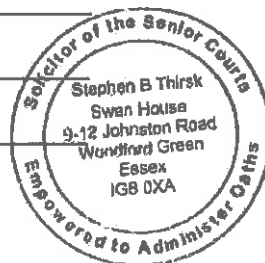
Statement of Truth

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

Signed: S. B. Thirsk

Name: _____

Date: 20-04-2018



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 STEPHEN THIRSK

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

REF: ATR/RC-017599

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P: 0208 724 8379

Claimant
T VETTA
First
Exhibits: TV/1
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Redbridge

Claimant

and

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(101) PERSONS UNKNOWN**

Defendants

WITNESS STATEMENT OF TRISTAN VETTA

I TRISTAN VETTA, Senior Forest Keeper, City of London, Epping Forest Office, The Warren, Loughton, Essex IG10 4RW, 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. The City of London Corporation owns and manages a large land holding, 830 acres of the City of London's land holding at Epping Forest can be found within the London Borough of Redbridge. In contrast to other land owned by The City of London within Essex and The London Borough of Waltham Forest, much of the land within Redbridge is in the form of open grassland areas, which are managed in various forms from meadow and scrub land, amenity grasslands and football pitches. This type of land use makes it more appealing and vulnerable to unauthorised access by travellers and trespassers. All areas of Forest are protected under the 1878 Epping Forest Act, in addition to this protection areas of Wanstead Flats are also designated as an area of Site of Special Scientific Interest.

3. When an unauthorised incursion by travellers occurs or is reported, the City of London, Forest Officers will attend immediately and inform the local police. The standard procedure by Forest Officers is to issue those causing the infringement a letter, copy of which is shown to me as (Exhibit TV/1). The letter states that they are trespassing on land owned and managed by the City of London Corporation and must leave immediately. A failure to leave the site within an hour of receipt of the letter will result in the caravans and vehicles being removed forcibly. In such an event occurs, Forest Keepers contact members of the Epping Forest Operation Team who are able to bring staff and machinery on site capable of moving vehicles and caravans off the site. Epping

Forest Keepers will remain on site at a safe distance to avoid risk of harm from assault, missiles thrown and abuse during the whole duration, to ensure that the trespassers do not remain on site. If an incursion has not vacated the Forest Land by the time police arrive, Epping Forest Keepers will engage with the travellers again in accompaniment with the police officers.

4. In May 2016, the Epping Forest Offices were informed by telephone of a large traveller incursion on Woodford Green (south of the Broadmead); this comprised of 11 caravans and associated vehicles which had been evicted from a local site. In this situation the convoy of caravans had dispersed into multiple directions and took up site on Mill Plain and Chingford Green which are areas within the London Borough of Waltham Forest area bordering The London Borough of Redbridge. The site was attended by Epping Forest Staff. This incursion totalled 24 hours of staff time due to the multiple number of staff required to follow off all the vehicles and caravans.

5. On 22nd June 2016, the Epping Forest Offices were informed by telephone that travellers were attempting to occupy George Green in Wanstead, East London a site which is owned by the City of London but managed by The London Borough of Redbridge. This is a very vulnerable area due to its vicinity to the A12 road, as well as being an area of high amenity value, because it is situated next to a large number of residential homes and businesses. Work by the Forest Keepers

and officers at Redbridge meant that the incursion was unable to settle. However, despite this initial action this still took up to 10 hours of staff time to deal with.

6. On 28th July 2017, the Epping Forest emergency telephone line was informed of a traveller incursion that was occurring on Wanstead Flats which is land owned and managed by the City of London Corporation. This involved 12 staff hours (outside of office hours) to deal with and special equipment 2 tractors. The estimated cost of this operation was £480; this included the fly tip rubbish removal by our litter team. Someone also broke a padlock to enable the travellers to gain access to the site. The unlawful traveller occupation took 8 hours, there were incidents of ASB including missiles, including golf balls being thrown, and defecation was found on site amongst the fly tip.

7. In addition to actual incursions that have occurred Forest Keepers carry out regular patrols to ensure that security measures are in place, as well as swiftly dealing with vehicles carrying reconnoitre of areas for potential sites. All traveller incursions onto Forest Land owned and managed by City of London Corporation demands a large amount of staff time and acts as a disruption to staff normal working practices and duties. Epping Forest is a registered charity (232990), so all incursions and the work carried out by staff to ensure that incursions are resolved swiftly to reduce further anti-social behaviour and

disruption to Forest users has to be met out of charitable funds. This action represents a large cost to the charity.

Statement of Truth

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

Signed:  _____

Name: TRISTAN VETTA

Date: 20/04/2018

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
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The London Borough of Redbridge
Claimant

And

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(101) PERSONS UNKNOWN
Defendants

WITNESS STATEMENT TRISTAN VETTA

Fiona Alderman
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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 TRISTAN VETTA

Exhibit TV/1 – Infringement Letter

Claimant
T Hall Andrews
First
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN:

THE LONDON BOROUGH OF REDBRIDGE

Claimant

and

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

Defendants

WITNESS STATEMENT OF TRACY HALL-ANDREWS

I, TRACY HALL-ANDREWS, resident of 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 have lived here for 24 years. In August 2017, there were two lots of travellers who parked-up in the Ford Sports and Social Club, directly behind my garden, which is a large sports field. The first group of travellers stayed for about one week and the second group stayed for

about 3 days. The first group of travellers were much larger than the second group and comprised of about 30 vehicles (including their caravans). The second group of travellers comprised of about 10-15 vehicles (including about 6 or 7 caravans).

3. Whilst the travellers encampments were on the sports grounds i was disturbed by the children making a lot of noise, playing until around 11pm/midnight, and the noise caused by their vehicles coming and going all-day and evening. The entrance to the fields is very close to my house.
4. On the day that the first travellers left the adults made a lot of noise shouting and screaming this went on for *of considerable length of time.*
5. I was also worried in case the travellers would come into my garden and break into my home.

Statement of Truth

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

Signed: *T. Hall-Andrews*

Name: TRACY HALL-ANDREWS

Date: 17-01-18

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 HALL-ANDREWS

Fiona Aldermann
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@bdlegal.org.uk
P: 0208 724 8379

Claimant
T Wilmot
First
Exhibits: TW/1-5
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 TERESE WILMOT

I, Terese Wilmot Principal of Beal High School, Woodford Bridge Road, Ilford, Essex IG4 5LP 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. Beal High School is at the heart of the Beacon Multi Academy Trust. We are committed to working in partnership with The Forest Academy, The Beacon Business and Innovation Hub and NELTA – North East London Teaching Alliance and SCITT. Beal is a mixed community comprehensive for student's aged 11 – 18 year olds. We

are a large school with 2400 students on roll, including 516 in the sixth form students. Included on the Beal roll is the Beacon Communication School for students, with a range of social communication difficulties including Autism and Asperger's syndrome. The Hatton School for special needs children border our field, our closet neighbour is Sinclair House Community Centre providing care for the elderly and other vulnerable adults. We are one of the largest secondary schools in the UK. We occupy a 26 acre site and have two major school buildings and sites. We are bordered by Woodford Avenue and Woodford Bridge Road and have vehicular access onto the site from these roads. The school supports and benefits the local community and there are many and varied sports and activities held on the site after school hours. We have a Caretaker resident on site.

3. On the early evening of 19th October 2017, I was informed that travellers had entered the school premises via the access road off Woodford Avenue. There are gates at this location, which were open at this time. This incident was witnessed by our Caretaker Mr Vincent Shirto who had been alerted by one of the football club members who was on site. The unlawful travellers incursion consisted of 4 trucks and caravans. The travellers drove onto site through the Woodford Avenue access gate (Exhibit TW/1) and drove around the turning road in front of the school (Exhibit TW/2) and then shortly after left the site. No damage or altercation occurred and other than a couple of bags no rubbish was dumped.
4. I drove into school the next morning on Friday 20th October 2017, through the same gate of Woodford Avenue. I noticed that there

were traveller's vehicles and caravans camped-up on the grass verges either side of our gates (Exhibit TW/3-4). We have a large school sports field at the side of the school (Exhibit TW/5) I was thankful that the travellers had not found their way onto the field the previous evening when they were on site. I reported the incursion to the local police and the Council's Enforcement Team. We did not have to cancel any events during this period but matches and events were rescheduled. We have reviewed our security arrangements for the school and holiday times. We work closely with our Safer Schools Officer and staff have remained vigilant.

Statement of Truth

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

Signed:



Name: T S Wilmot Principal Beal High School

Dated: 17.4.18

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 THERESE WILMOT

Exhibit TW/1

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

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The London Borough of Redbridge

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

Defendants

WITNESS STATEMENT OF THERESE WILMOT

Exhibit TW/2

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

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Claimant

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(101) PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF THERESE WILMOT

Exhibit TW/3

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 THERESE WILMOT

Exhibit TW/4

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

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

Defendants

WITNESS STATEMENT OF THERESE WILMOT

Exhibit TW/5

IN THE HIGH COURT OF JUSTICE
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Claimant

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

WITNESS STATEMENT OF TERESE WILMOT

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IG1 1DD

REF: ATR/RC-017599

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Claimant
D Walters
First
Date:

IN THE HIGH COURT OF JUSTICE

CLAIM NUMBER:

QUEENS BENCH DIVISION

BETWEEN

The London Borough of Redbridge

Claimant

and

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

Defendants

WITNESS STATEMENT OF DAVID WALTERS

I, David Walters, Store Manager, Tesco's, Woodford Green Superstore, Southend Road, Woodford Green IG8 8GE 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 have been the Store Manager of the Tesco's, Woodford Green Superstore for the past year. This is a large local store positioned on a main 'A' road within the Borough and within a large local residential area; we also have a business park and local schools nearby. During the period that I have been the Store Manager we have had ongoing

problems and issues with travellers abusing the property. We have had a number of unlawful travellers incursions on our site, the last one being 25th January 2018. Prior to that we suffered incursions on the: 8th January 2018, 21st December 2017, 8th December 2017, 23rd October 2017, 19th October 2017, 15th September 2017, 21st June 2017 5th May 2017 and 27th April 2017. The travellers drive onto the site during business hours and then park their vehicles and caravans on the site and spread out all over the store car park, taking-up customer spaces and disrupting our business. This is a car park solely for customers to our Supermarket, there are no open spaces or grass areas. On each occasion we have had to call the police and our internal security team to deal with the incursion.

3. Generally, the travellers do not stay on our site long, apparently using it as a staging post before moving off to other local sites. Each time they have been on our site they have caused the following problems: fly-tipping and dumping rubbish over the car park; stealing our supermarket metal trolleys; verbally abusing staff and stealing products from the store.
4. The travellers' presence on the site is a big turn-off for our customers wanting to shop in the store; we have a significant drop in sales when travellers are on our site. It is very difficult and costly for the company to move them on and causes disruption, distress and problems for staff. Tesco Stores will support any initiative or Court action taken by Redbridge Council to prevent incursions by travellers on Tesco sites within the Borough.

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

Signed: *D Walters*

Name: David Walters

Dated: 24/4/2018

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
CLAIM NUMBER:
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The London Borough of Redbridge
Claimant

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

WITNESS STATEMENT OF DAVID WALTERS

Fiona Alderman
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Claimant
M Chappell
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 MARK CHAPPELL

I, MARK CHAPPELL, Manager at Coverdale K9 Security Services Ltd, Coverdale, Oak Road, Crays Hill, Essex CM11 2YL 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 in a managerial role by Coverdale K9 Security Services Ltd, Coverdale, Oak Road, Crays Hill, Essex CM11 2YL. We are a private security company employed by our customers and contractors to provide uniformed security officers and dog handler patrols on a 24

hours basis at sites vulnerable to break-ins, encampments, damage and other criminal activities.

3. We were contracted by Wanstead Rugby Club to provide 24 hours security at the Club site in Roding Lane North, South Woodford from 11am on the 4th September 2017, as trespassers had occupied their site. The security consisted of 1 dog handler. I understand that when the dog handler arrived on the site he was approached by a group of travellers who asked him what he was doing there. He informed them that he was employed to patrol the site and keep an eye on things. Apparently, he was told by the travellers that if he tried to stop them coming or going they would beat him and the dog. This is the response that we get from most of the sites we are employed on where travellers are present.
4. Generally when we are contracted to attend a site, where travellers have formed an unauthorised encampment our officers will be spat at us, verbally abused and threatened by the travellers. It is unfortunate that when we call the police their response is often poor and sometimes they do not turn up. My company has covered many sites where unauthorised travellers encampments have formed in the London area and in various parts of the Country. It is very common for our staff to get a lot of abusive and threats from travellers on these sites. All of this information comes to me during the course of my role as a manager. The travellers swear and throw things at staff and will often block the entrances with their vehicles and caravans so our day and night security guards cannot change over. This is indicative of the intimidation and unlawful behaviour our security guards suffer on a daily basis at many of the sites we cover when there are travellers involved.

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

Signed Mark Chappell :

Name: Mark Chappell

Date: 17/4/2018

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
CLAIM NUMBER:
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The London Borough of Redbridge
Claimant

And

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

WITNESS STATEMENT OF MARK CHAPPELL

Fiona Alderman
Head of Legal Services
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