

Claimants  
Karen Dunn  
Twelfth Witness Statement  
Exhibits KD1-KD3  
11<sup>th</sup> March 2024

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim No. QB-2020-002112

B E T W E E N :

(1) TEST VALLEY BOROUGH COUNCIL  
(2) HAMPSHIRE COUNTY COUNCIL

Claimant

-and-

(1) ALBERT BOWERS  
(2)-(89) OTHER NAMED DEFENDANTS  
(90) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS  
WITHIN THE BOROUGH OF TEST VALLEY

Defendants

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**TWELFTH WITNESS STATEMENT OF KAREN DUNN**

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I, **Karen Dunn**, Head of Legal and Democratic Services at Test Valley Borough Council, Beech Hurst, Weyhill Road, Andover SP10 3AJ will say as follows:

1. I make this witness statement on behalf of the Claimants and in support of the Claimants' Application seeking:
  - i. to add further named Defendants to the Claim;
  - ii. to discontinue against D88, Winnie McDonagh;
  - iii. to amend the spelling of the names of D3, D19, D50 and D84;
  - iv. permission to serve this Order by alternative means;
  - v. a further alternative service order in relation to two sites that the Claimants have previously sought to add to the proceedings and over which injunctive relief is sought; and
  - vi. consequential directions.

2. I am authorised by the First and Second Claimants to make this witness statement on their behalf. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been prepared through email communication with the Claimants' external legal advisers.
3. I exhibit a short bundle of documents and where I refer to the same I do so in the format **KD[exhibit number]**.

### **The Applications**

4. These Applications are made pursuant to paragraph 1 the Order of Foster J dated 29 February 2024 (**KD1**), which itself varied the Order of the Constable J dated 27 December 2023. That Order directed that all additional applications (if any) required to enable the trial to take place on the earliest practicable date thereafter must be made by 14 March 2024.
5. The final hearing in this Claim is listed for 13 and 14 May 2024.

### **Application to add named Defendants**

6. The Claimant applies to add 47 further named Defendants to the Claim. All of these persons have been identified as forming unauthorised encampments in the Borough of Test Valley.
7. As I have explained in previous witness statements, the various rounds of updating evidence that have been produced in these proceedings (as directed by the Court) have disclosed new names and identities of those who have formed unauthorised encampments in the Borough of Test Valley since the issuing of the Claim. Following the decision of the Supreme Court in *Wolverhampton City Council & Ors v Persons Unknown & Ors* [2023] UKSC 47 (to which the Claimants were successful respondents), it is clear that the Claimants must name those persons whom it is reasonably practicable for them to do so. The Claimants now make this Application accordingly.

8. I exhibit at **KD2** a schedule that details the names of the proposed new Defendants and their addresses for service, as well as their proposed Defendant numbers and reference to where the allegations against them can be found in the evidence.
9. The identifying information (ie. names and addresses) have been obtained from the Police National Computer by searching the computer for the vehicle registrations of those vehicles that are identified present at an encampment. The Claimants seek to name the registered keepers of the vehicles as Defendants, as is common in cases of this nature.
10. I should explain that not all persons identified by the various PNC checks have been named as Defendants. The reasons for excluding some persons are:
  - i. in some cases, there are clear anomalies in the data, or a vehicle has been reported to the DVLA as no longer in the ownership of the registered person at the time of the encampment, but no updated registered keeper data was held on the PNC;
  - ii. in many instances, the Police unfortunately did not undertake PNC checks contemporaneous with the encampment, and instead undertook the check later when the Defendant list was compiled. In some instances, the PNC check revealed that the vehicle had changed ownership in the interim period, and historic data is not available to the Claimants. In those circumstances it is not possible for the Claimants to be sure who was the registered keeper at the time of the encampment, such that no person can be named in that regard. This issue is especially prevalent in the updating evidence contained in the third witness statement of Inspector Chris Taylor of November 2022;
  - iii. In relation to the persons identified by way of the updating evidence of November 2022, the Claimants were mindful that most of the address data was obtained by way of PNC checks conducted in August 2022, with the encampments having occurred over the preceding 18-month period. Further, in relation to the updating evidence of March 2024, whilst the PNC checks relied upon were contemporaneous with the relevant encampment, those encampments date as far back as August 2022 (when the period of earlier updating evidence ended). With that in mind, I requested

that the Police re-check the VRM data to ensure that the Claimants had up to date addresses for service. Unfortunately, those checks revealed again that the ownership of several vehicles have changed since the date of the last PNC check, and some vehicles have been scrapped, reported as stolen or the registered owner has declared to the DVLA that they no longer own the vehicle. In those circumstances, the Claimants have not named the person who was suspected to have owned the vehicle at the time of the encampment, as the Claimants have no way of tracing or communicating with that person at this time;

- iv. in relation to the most recent updating evidence (the first witness statement of Inspector Paul Holmes), the exhibits to the witness statement show that contemporaneous PNC checks were not always undertaken, and unfortunately the Police have not provided any ex post facto PNC data. The Claimants have named those persons for whom contemporaneous PNC checks are available.
11. As such, I respectfully submit that the circumstances, the Claimants have done that which is reasonably practicable in the identification of further named Defendants, and have identified 47 persons in that regard, and seek to add those persons to the proceedings accordingly.
12. Given the tight timetable to trial, the Claimants have proposed in the draft Order attached hereto that the proposed new Defendants should follow the same timetable as the pre-existing named Defendants.

#### **Application to discontinue**

13. The Claimants seek to discontinue the Claim against D88, Winnie McDonagh, as upon review of the information available to the Claimants, it appears that there is no person of this name at the address stated in Schedule 1 to the Claim Form. Permission is needed to discontinue, as interim injunctive relief has been granted.

#### **Application to amend spellings**

14. The Claimants apply to amend the spelling of the following Defendants' names:

- i. D3 Annie Mcdonagh to **Annie McDonagh**;
  - ii. D19 Dylan Mcdonagh to **Dylan McDonagh**;
  - iii. D50 Loius Ayres to **Louis Ayres**;
  - iv. D84 Tommy McDonagh to **Thomas McDonagh**;
15. The alternative (and correct) spelling of the names of these persons has been ascertained by review of the PNC data. I respectfully submit that the amendments are minimal, and the persons who have been served will at all times have known that they are the person to whom the Claim Form and evidence has referred (especially as they have always been referred to by linking them to the VRM of their vehicle). Further, when the earlier Scott Schedules were served on the named Defendants in these proceedings (as directed by Nicklin J), the title to each of the above Defendants' Schedule noted the discrepancy in the spelling and corrected the same. As such, I submit that there is no prejudice in the amendment sought, which is purely typographical, and which is sought to ensure the accuracy of the Claim Form.
16. As the Application to amend the spellings is so minor, the Claimants respectfully seek an Order dispensing with service of what will be the Re-Re-Amended Claim Form.

#### **Alternative service: two additional sites**

17. The Claimants have the benefit of an alternative service Order which assist in the service of Persons Unknown in these proceedings, and which is replicated across all Orders that the Claimants seek and which are made.
18. By way of an application dated 29 November 2022 (the '**November 2022 Application**'), the Claimants sought to add two further sites to the proceedings, over which they would seek injunctive relief. It had been intended that the Application would be heard on the morning of the final hearing. However, the final hearing has taken quite some time to achieve an effective listing, because of the ongoing (and now concluded) hearing in the *Wolverhampton* appeal.

19. Upon review of the file when making these Applications in accordance with the Order of Foster J, I have noticed that the Claimants have not sought and obtained an alternative service Order in relation to these two sites, which is necessary as these two sites fall outside of ‘Area A’ and ‘Area B’, which are currently served under the terms of the alternative service Order from which the Claimants benefit.

20. Accordingly, the Claimants now seek to add a further clause to the alternative service Order that permits service on the two specific sites that they sought to add by way of the November 2022 Application, those being:

- i. The Romsey Rapids, Southampton Road, Romsey SO51 8AF; and
- ii. Nursling and Rownhams Recreation Ground, Joe Bigwood Close, Nursling, Hampshire SO16 0YL.

21. To ensure that the Application to add the two above sites to the Claim has also been properly served, the Claimants also respectfully seek an Order that permits service of the November 2022 Application on the site, along with all pre-existing documents in the Claim.

22. Given the volume of the documents in this Claim, the Claimants respectfully ask that the documents other than the November 2022 Application Notice itself be served by way of a notice addressed to “Persons Unknown forming encampments within the Borough of Test Valley” advising that a copy of the supporting evidence and all documents in the Claim can be obtained or inspected at the First Claimant’s offices. That provision mirrors the current provision for Area A and Area B.

## **Conclusion**

23. Following the above applications, and consequent directions, the Claim should be ready for trial on 13 and 14 May 2024, as required.

**STATEMENT OF TRUTH**

I believe the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: 

Dated: March 2024

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim No. QB-2020-002112

B E T W E E N :

(1) TEST VALLEY BOROUGH COUNCIL  
(2) HAMPSHIRE COUNTY COUNCIL

Claimant

-and-

(1) ALBERT BOWERS  
(2)-(89) OTHER NAMED DEFENDANTS  
(90) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS  
WITHIN THE BOROUGH OF TEST VALLEY

Defendants

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EXHIBIT

KD1

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REFERRED TO IN THE TWELFTH WITNESS STATEMENT OF KAREN  
DUNN

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IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim No. QB-2020-002112

Before The Honourable Mrs Justice FOSTER

B E T W E E N :



(1) TEST VALLEY BOROUGH COUNCIL  
(2) HAMPSHIRE COUNTY COUNCIL

Claimant

—  
-and-

(1) ALBERT BOWERS  
(2)-(89) OTHER NAMED DEFENDANTS  
(90) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS  
WITHIN THE BOROUGH OF TEST VALLEY

Defendants

**ORDER**

UPON the Claimants without notice Application dated 29 February 2024 seeking (i) an extension to the deadline for the Claimants' filing of all additional applications required ahead of the trial of the Claim, as provided for in paragraph 1 of the Order of Constable J dated 27 December 2023, (ii) an extension to the deadline for the Claimants' filing and serving of updating evidence, as provided for in paragraph 2 of the Order of Constable J dated 27 December 2023, (iii) consequent amendments to the directions to trial and (iv) permission to serve this Order by alternative means.

AND UPON the Court considering the witness statement of Karen Dunn dated 28 February 2024

**AND UPON** the Court considering the Application on the papers and without a hearing

**IT IS ORDERED THAT:**

**Amended directions**

1. The Claimants must by 4.30pm on 14 March 2024 make all additional applications (if any) required to enable the trial to take place on the earliest practicable date thereafter.
2. The Claimants must file and serve any further evidence upon which they seek to rely at the trial of the Claim by 4.30pm on 14 March 2024.

3. The Defendants must file and serve any evidence or further evidence (as applicable) upon which they seek to rely at the trial of the Claim by 4.30pm on 4 April 2024.
4. The Claimants may (if so advised) file and serve any evidence in reply by 4.30pm on 18 April 2024.
5. Save as where varied in the foregoing paragraphs, all directions in the Order of the Honourable Mr Justice Constable dated 27 December 2023 shall remain in effect

#### **Service of this Order**

6. This Order shall be deemed served on the 90<sup>th</sup> Defendant (Persons Unknown) pursuant to CPR 6.26 and 6.27 on the date when the following steps are completed:
  - a. affixing copies (as opposed to originals) of this Order in a transparent envelope in a prominent position on or close to all adopted highway entry points within the area marked with a red line and marked as Area A in Schedule 1 of this Order with a notice to "Persons Unknown forming encampments within the Borough of Test Valley" that a copy of the supporting evidence can be obtained or inspected at Test Valley Borough Council, Beech Hurst, Weyhill Road, Andover, Hampshire SP10 3AJ;
  - b. affixing 50 copies (as opposed to originals) of this Order approximately equidistant to each other, as far as is reasonably practicable, around the perimeter of the area marked with a red line and marked as Area A (but inside the boundary where the boundary is marked through a road or waterway or is otherwise inaccessible) on the map attached to Schedule 1 of this Order, with a notice to "Persons Unknown forming encampments within the Borough of Test Valley" that a copy of the supporting evidence can be obtained or inspected at Test Valley Borough Council, Beech Hurst, Weyhill Road, Andover, Hampshire SP10 3AJ;
  - c. for the additional areas of land marked Area B on the map attached at Schedule 2 of this Order, by affixing copies (as opposed to originals) of this Order in a transparent envelope in a prominent position on the land with notice to "Persons Unknown forming encampments within the Borough of Test Valley" that a copy of the supporting evidence can be obtained or inspected at Test Valley Borough Council, Beech Hurst, Weyhill Road, Andover, Hampshire SP10 3AJ.

#### **Liberty to apply**

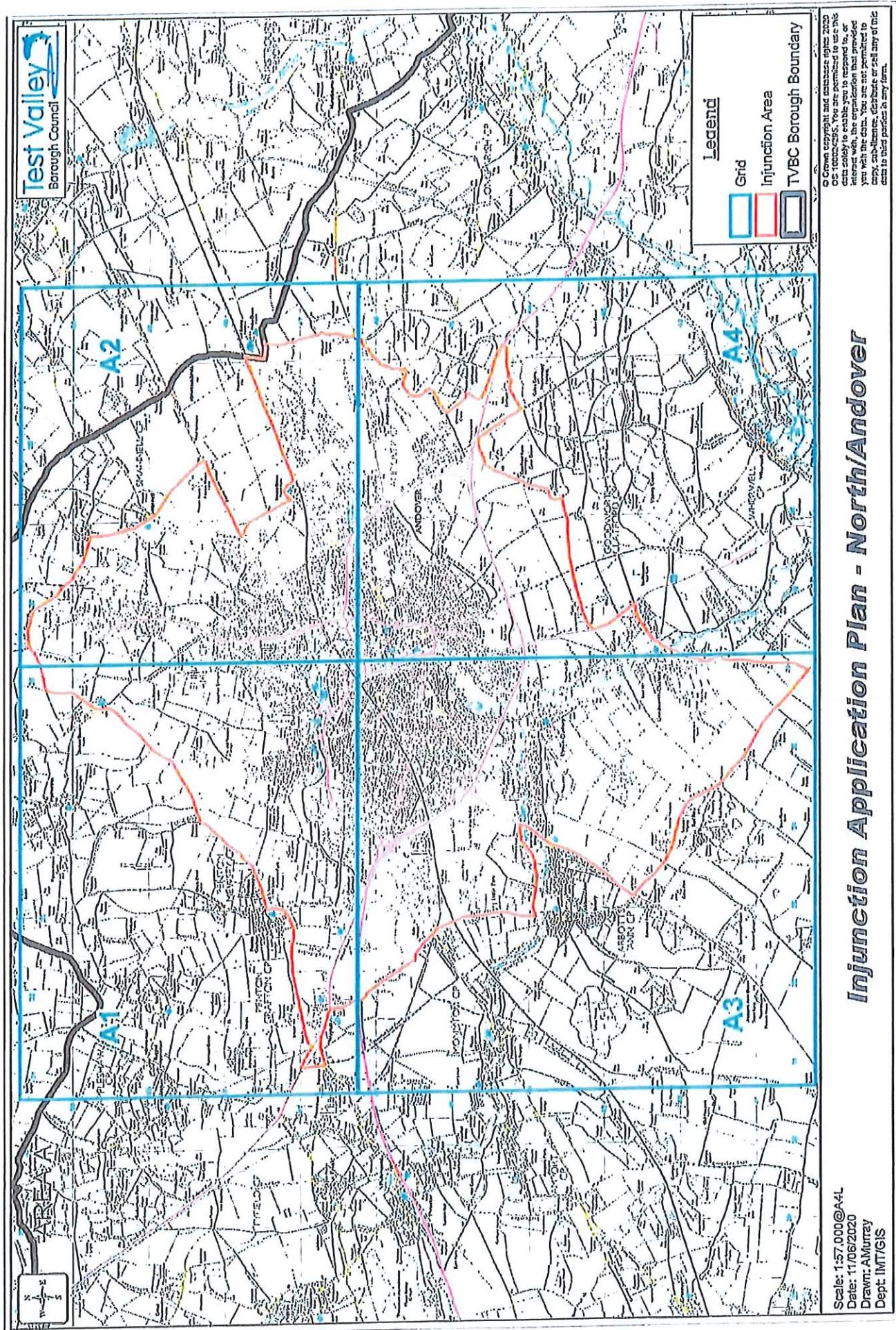
7. The Claimant and Defendants (or anyone notified of this Order) may apply to the Court on 72 hours written notice to all parties to these proceedings and their legal advisers to vary or discharge this Order (or so much of it as affects that person).

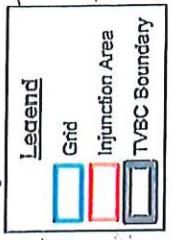
**Costs**

8. No order as to costs.

**Dated this 29 Feb 2024**

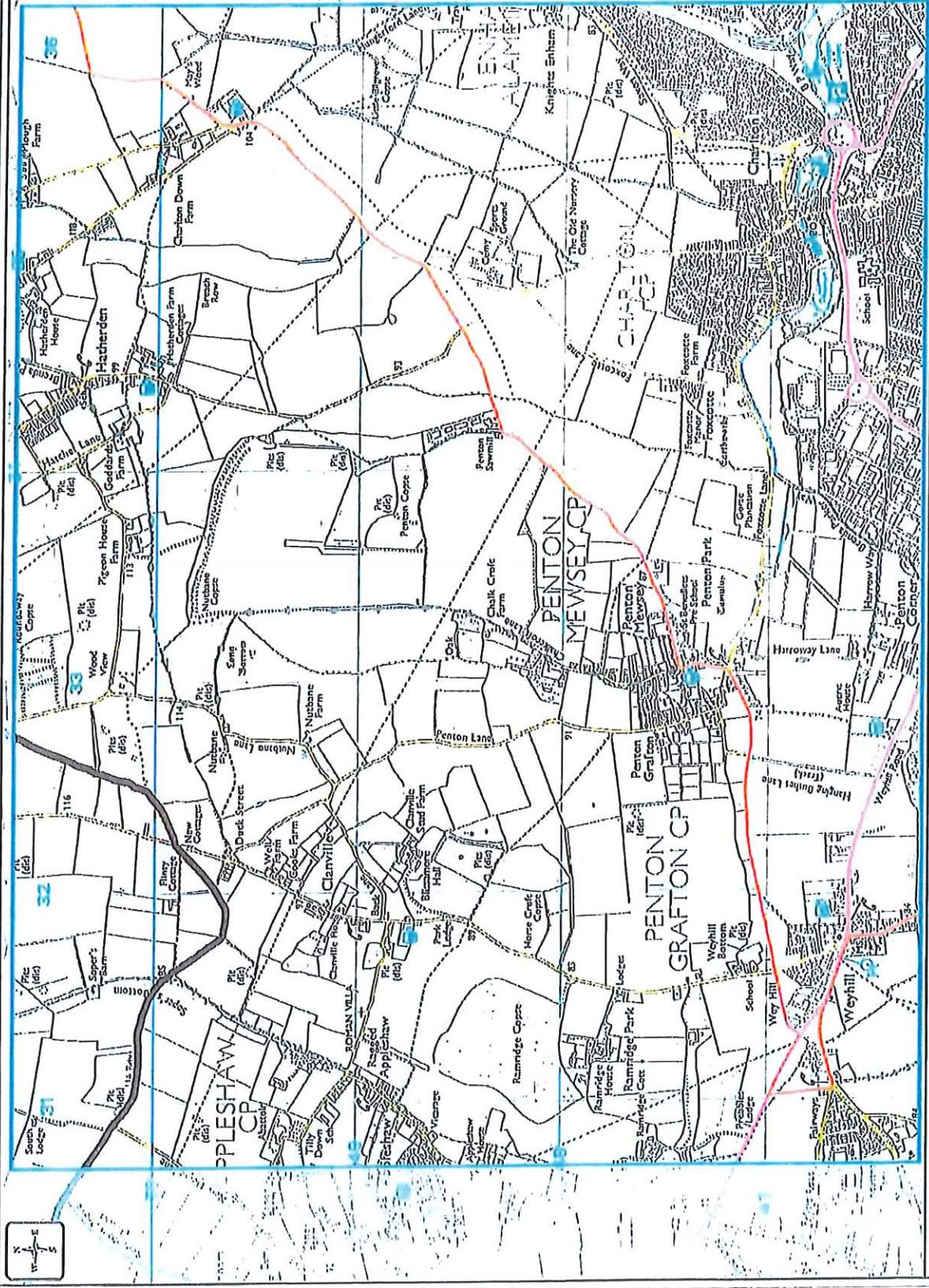
**SCHEDULE 1 – AREA A**

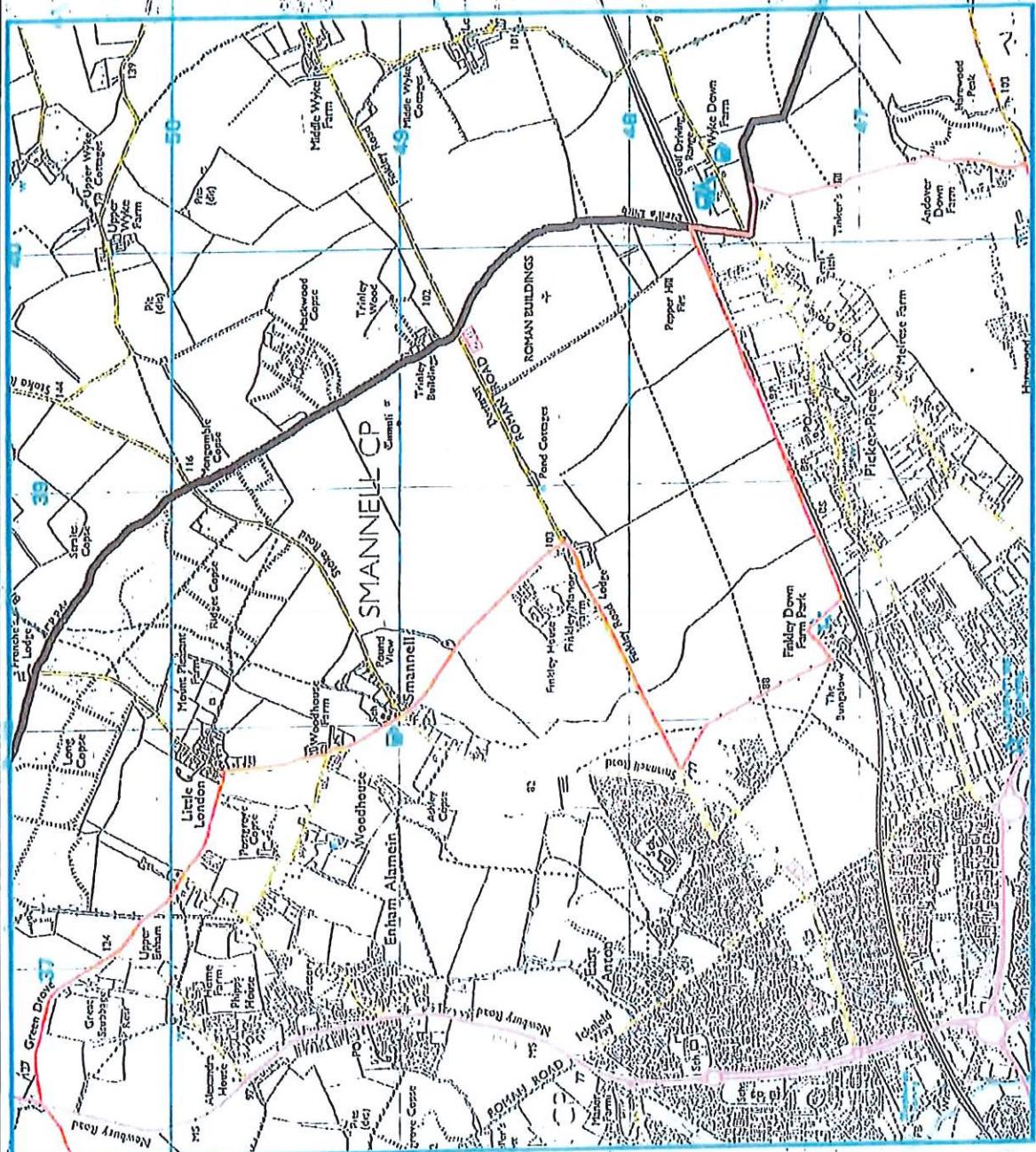




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## Injunction Application Plan - North/Andover A1 Grid Section

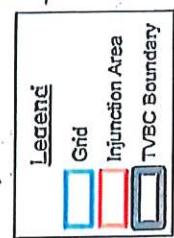
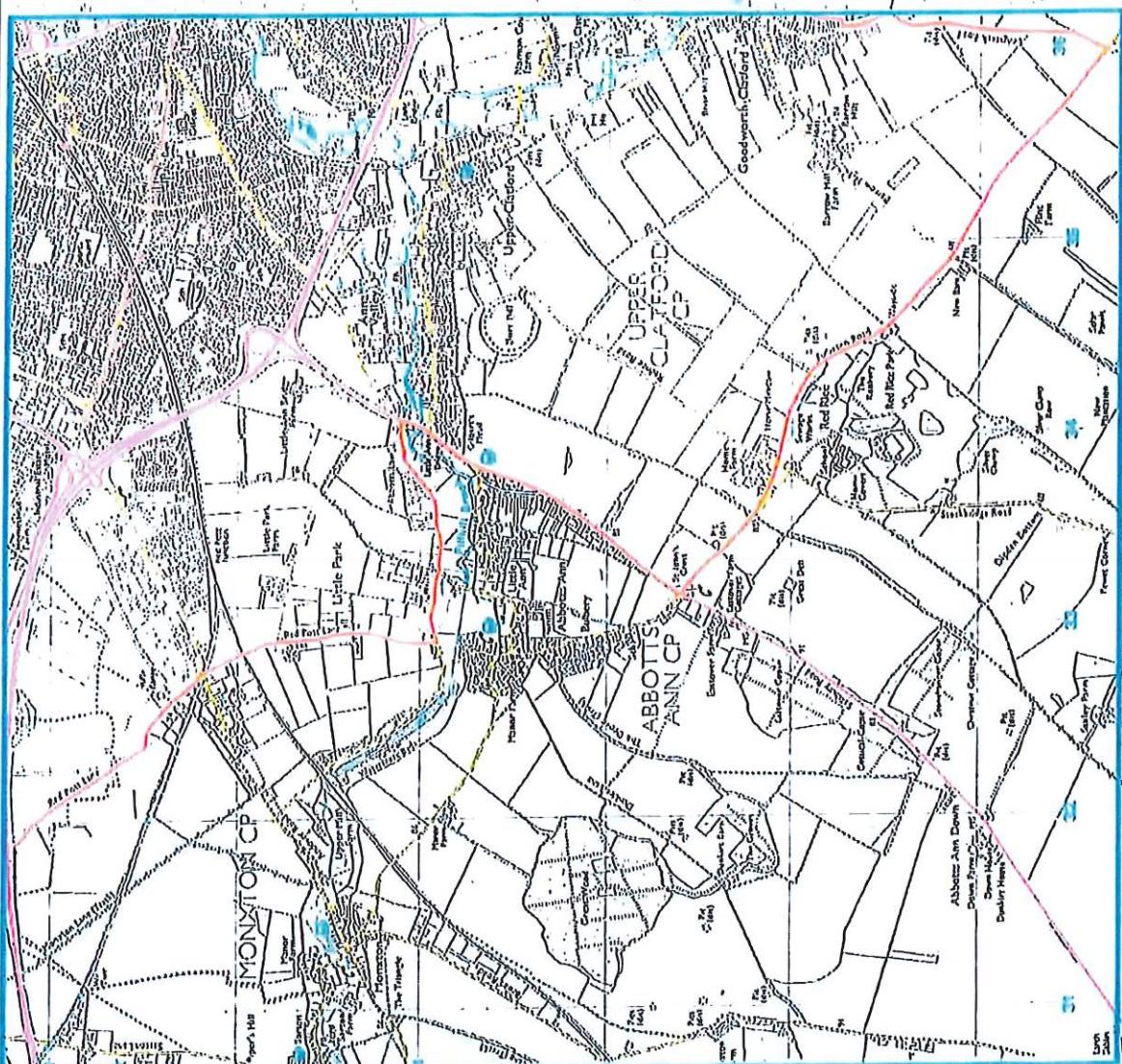




**Injunction Application Plan - North/Andover  
A2 Grid Section**

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Date: 11/06/2020  
Drawn: AMurray  
Dept: IMT/GIS

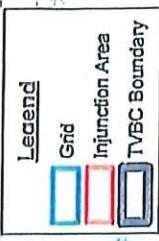
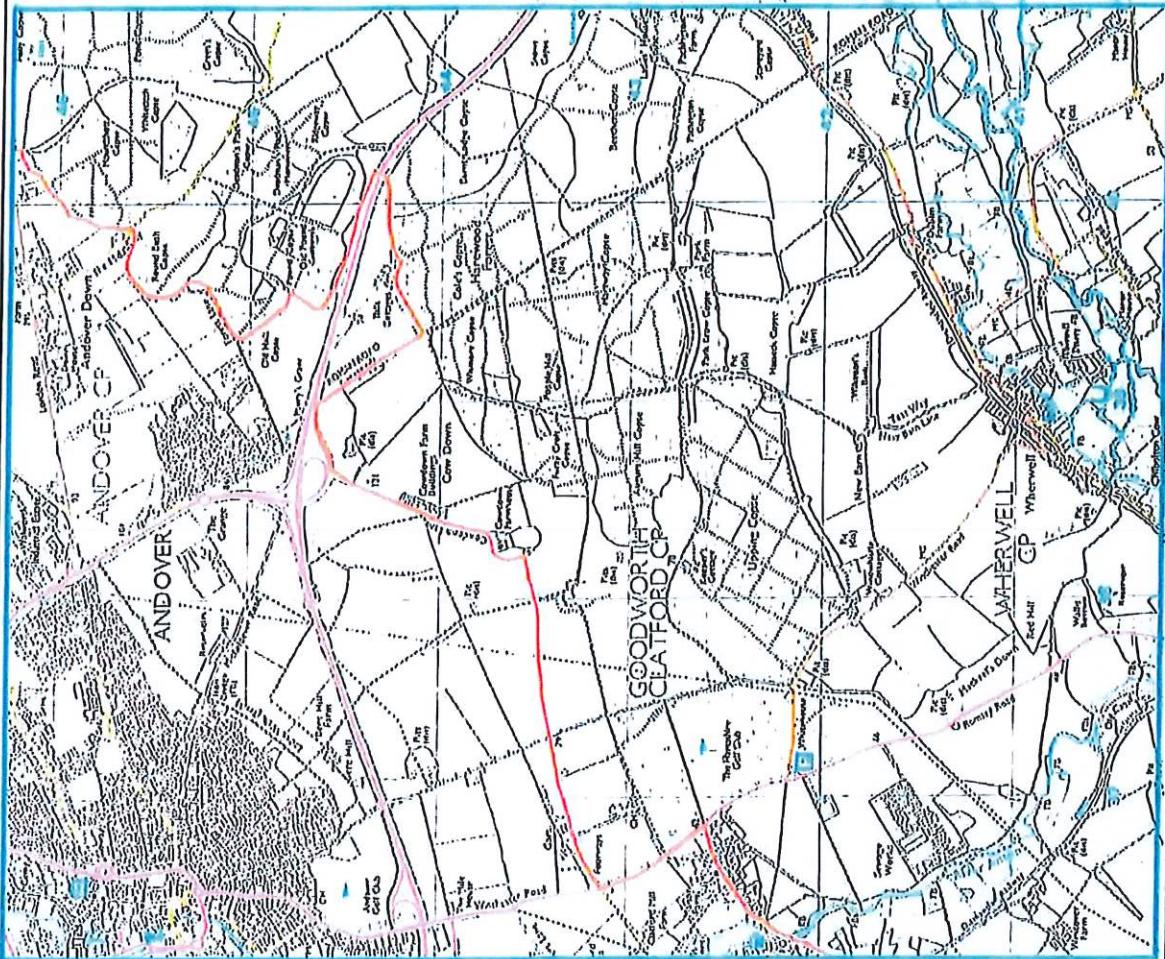
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## Injunction Application Plan - North/Andover A3 Grid Section

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Date: 11/06/2020  
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Dept: MTT/CS

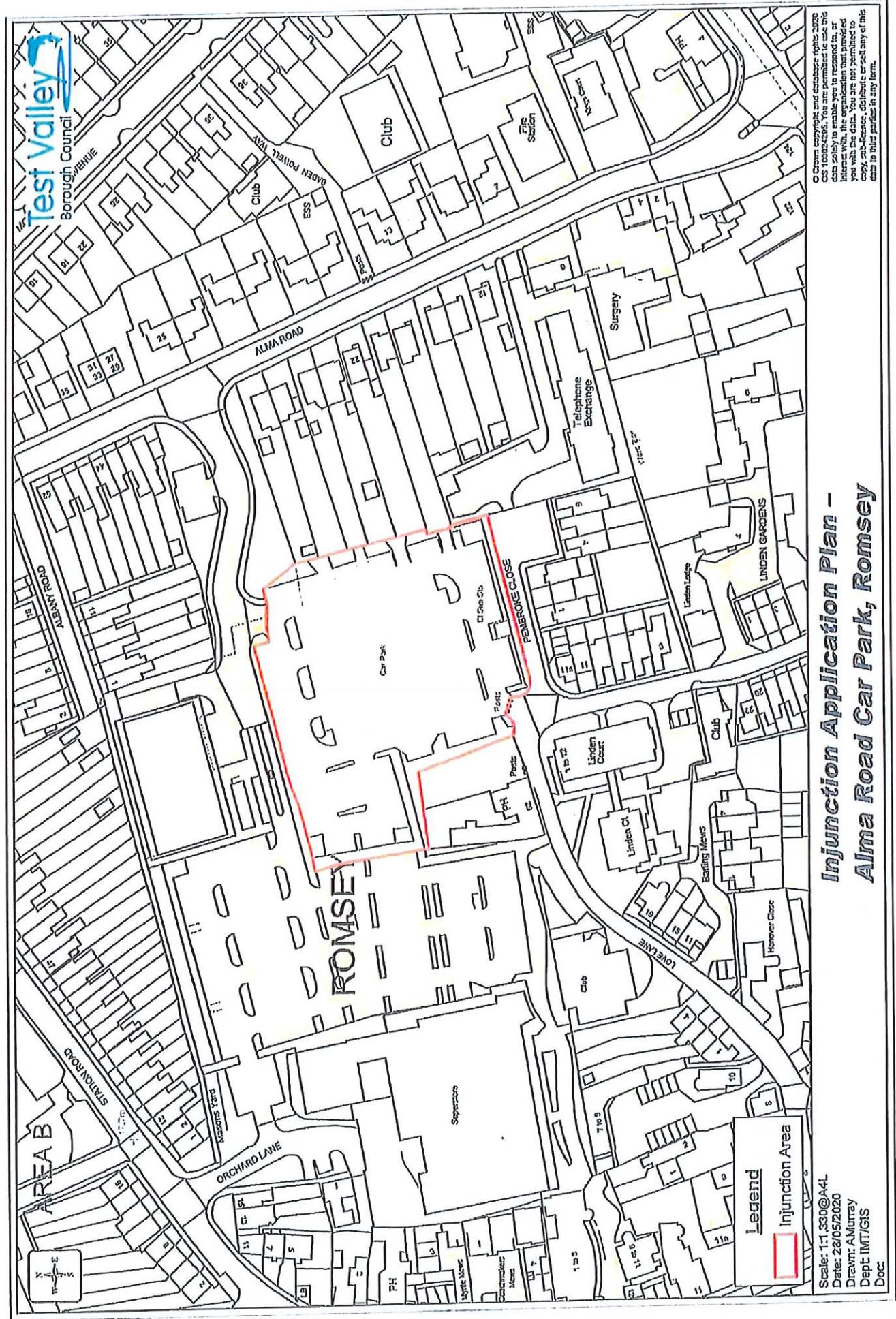


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## Injunction Application Plan - North/Andover A4 Grid Section

Scale: 1:25,750@A4L  
Date: 11/06/2020  
Drawn: AMunney  
Dept: IMT/GIS

**SCHEDULE 2 – AREA B**



## Injunction Application Plan – Alma Road Car Park, Romsey

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim No. QB-2020-002112

B E T W E E N :

(1) TEST VALLEY BOROUGH COUNCIL  
(2) HAMPSHIRE COUNTY COUNCIL

Claimant

-and-

(1) ALBERT BOWERS  
(2)-(89) OTHER NAMED DEFENDANTS  
(90) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS  
WITHIN THE BOROUGH OF TEST VALLEY

Defendants

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EXHIBIT

KD2

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REFERRED TO IN THE TWELFTH WITNESS STATEMENT OF KAREN  
DUNN

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Persons identified from updating evidence

D No.	Name	Associated VRM	Address for service	Evidence Reference and/or notes	March 2024 PNC check
91	Simon McGinley	NV16 YXT	134 Alder Street, Newton-Le-Willows, Merseyside WA12 8HP	Taylor WS3 para 14, Exhibit CT4  Proposed Defendant was the registered keeper of VRM NV16 YXT at the time of the encampment  Vehicle identified at the encampment	Details confirmed
92	Martina Quilligan	N/A	Carousel Park, Basingstoke Road, Micheldever, Winchester, Hampshire SO21 3BW	Taylor WS3 para 16, Exhibit CT6  Proposed Defendant identified by Police Officers as an 'involved person' at the encampment	N/A
93	Bridget Quilligan	N/A	Carousel Park, Basingstoke Road, Micheldever, Winchester, Hampshire SO21 3BW	Taylor WS3 para 16, Exhibit CT6  Proposed Defendant identified by Police Officers as an 'involved person' at the encampment	N/A

94	Linda Barnett	WF09 FSV	Park Place Nursery Cottage, Titchfield Lane, Wickham PO17 5HB	Taylor WS3 para 19, Exhibit CT9	Proposed Defendant was the registered keeper of VRM WF09 FSV at the time of the encampment (see also police spreadsheet)	Vehicle identified at the encampment	Details confirmed
95	James Galbraith	KM22 XLK	40 Nevis Grove, Bletchley, Bucks MK2 3NY	Taylor WS3 para 19, Exhibit CT9	Proposed Defendant was the registered keeper of VRM KM22 XLK at the time of the encampment (see also police spreadsheet)	Vehicle identified at the encampment	Details confirmed
96	Steven Jackson	PE09 ZJV	6 Gretsy Buildings, Nantwich, Cheshire CW5 5PX	Taylor WS3 para 19, Exhibit CT9	Proposed Defendant was the registered keeper of VRM PE09 ZJV at the time of the encampment (see also police spreadsheet)		Details confirmed (address updated)

			Vehicle identified at the encampment	
97	Martin Doherty	BV17 YUF	31 Thingley Caravan Site, Easton Lane, Wiltshire SN14 0RW	Taylor WS3 para 20, Exhibit CT10  Proposed Defendant was the registered keeper of VRM BV17 YUF at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
98	Paul Kranjewski	WV17 YRR	16 Oaktree Way, Cannington, Bridgewater, Somerset TA5 2RL	Taylor WS3 para 20, Exhibit CT10  Vehicle identified at the encampment

			Proposed Defendant was the registered keeper of VRM WV17 YRR at the time of the encampment (see also police spreadsheet)	
99	Paddy Mohan	RK09 YJP 8JZ	73 Holloway Road, London N7	Taylor WS3 para 20, Exhibit CT10  Proposed Defendant was the registered keeper of VRM RK09 YJP at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
100	Jayson Stanley	LK14 EDR	Keepers Yard, Nash Lee Road, Terrick, Aylesbury HP17 0TQ	Taylor WS3 para 20, Exhibit CT10  Proposed Defendant was the registered keeper of VRM LK14 EDR at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment

			Taylor WS3 para 25, Exhibit CT15	
			Proposed Defendant was the registered keeper of VRM LK14 EDR at the time of the encampment (see also police spreadsheet)	Vehicle identified at the encampment
101	Savanah Carter	BD20 JTX	Heatherley House, Alderminster Road, Pamber End, Hampshire RG26 5QN	Taylor WS3 para 20, Exhibit CT10  Proposed Defendant was the registered keeper of VRM BD20 JTX at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
				Taylor WS3 para 25, Exhibit CT15  Proposed Defendant was the registered keeper of VRM BD20 JTX at the time of the

			encampment (see also police spreadsheet)
102	John Mufhy	GY55 AOD 6 Sandières Caravan Site, Long Green, Cressing, Essex CM77 8DL	<p>Vehicle identified at the encampment</p> <p>Taylor WS3 para 20, Exhibit CT10</p> <p>Proposed Defendant was the registered keeper of VRM GY55 AOD at the time of the encampment (see also police spreadsheet)</p> <p>Vehicle identified at the encampment</p>
103	Martin McDonagh	UIG4436 13 Castlebalfour Park, Enniskillen BT92 0GD	<p>Taylor WS3 para 21, Exhibit CT11</p> <p>Proposed Defendant was the registered keeper of VRM UIG4436 at the time of the encampment (see also police spreadsheet)</p> <p>Vehicle identified at the encampment</p>
			Holmes WS1 para 16, Exhibit PH9

			Proposed Defendant was the registered keeper of VRM U1G4436 at the time of the encampment	
104	Patrick Collins	NH07 XNM LG10 Springfield House, Springfield Street, Barnsley S70 6EQ	Taylor WS3 para 21, Exhibit CT11  Proposed Defendant was the registered keeper of VRM NH07 XNM at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment	Details confirmed
		BW64 BHO	Holmes WS1 para 16, Exhibit PH9  Proposed Defendant was the registered keeper of VRM BW64 BHO at the time of the encampment  Vehicle identified at the encampment	No further check conducted

105	Charlie McDonagh	LG19 XWP	9 Rockfield Park, Belleek, Enniskillen BT93 3GJ	Taylor WS3 para 21, Exhibit CT11	Details confirmed
				Proposed Defendant was the registered keeper of VRM LG19 XWP at the time of the encampment (see also police spreadsheet)	
				Vehicle identified at the encampment	
106	Willie McDonagh	WIG2614	56 Main Street, Castlederg, County Tyrone BT81 7AN	Taylor WS3 para 21, Exhibit CT11	Details confirmed
				Proposed Defendant was the registered keeper of VRM WIG 2614 at the time of the encampment (see also police spreadsheet)	
				Vehicle identified at the encampment	
107	Tony Murphy	DU10 KWX	6 Sydney Lane, Aughnacloy, Coounty Tyrone BT69 6AF	Taylor WS3 para 23, Exhibit CT13	Details confirmed
				Proposed Defendant was the registered keeper of VRM DU10 KWX at the time of the encampment (see also police spreadsheet)	

			Vehicle identified at the encampment	
108	Sarah Crawley	GX06 HWG	42D the Fairway, Leicester LE26 6LN	Taylor WS3 para 24, Exhibit CT14  Proposed Defendant was the registered keeper of VRM GX06 HWG at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
109	Charles Ward	CU13 BPX	7 New Acres, Spade Lane, Sittingbourne, Kent ME9 7TT	Taylor WS3 para 24, Exhibit CT14  Proposed Defendant was the registered keeper of VRM CU13 BPX at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
110	Mary McDonagh	PN07 EFT	5 Boggs Cottages, Keele Road, Newcastle, Staffordshire ST5 5AB	Taylor WS3 para 24, Exhibit CT14  Vehicle identified at the encampment

			Proposed Defendant was the registered keeper of VRM PN07 EFT at the time of the encampment (see also police spreadsheet)	
111	Sally Ann O'Connor	EN64 XGT 3NA	Taylor WS3 para 25, Exhibit CT15  Proposed Defendant was the registered keeper of VRM EN64 XGT at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment	Details confirmed
112	David Moors	BV61 RNU	79 Towcester Road, Northampton NN4 8LR  Proposed Defendant was the registered keeper of VRM BV61 RNU at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment	Details confirmed (address updated)

113	Nathan Stewart	CP08 HWF	11 Meynells Gorse, Gold Course Lane, Leicester LE3 1UY	Taylor WS3 para 25, Exhibit CT15  Proposed Defendant was the registered keeper of VRM CP08 HWF at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
114	James McDonagh	YR62 DDU	The Woodlands, Rotherham Road, Killamarsh, Sheffield S21 2DS	Taylor WS3 para 25, Exhibit CT15  Proposed Defendant was the registered keeper of VRM YR62 DDU at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
115	Bridget Quiligan	DV66 UUP	Annexe Hentroost Farm, Old Gloucester Road, Winterbourne, Bristol BS36 1RZ	Taylor WS3 para 25, Exhibit CT15  Proposed Defendant was the registered keeper of VRM DV66 UUP at the time of the

			encampment (see also police spreadsheet)	
116	John Mohan	HJ10 VEH	Vehicle identified at the encampment  9B Carousel Park, Micheldever, Winchester, Hampshire SO21 3BW	Taylor WS3 para 25, Exhibit CT15  Proposed Defendant was the registered keeper of VRM HJ10 VEH at the time of the encampment (see also police spreadsheet)
117	Matthew Watts	SN19 GUX	Vehicle identified at the encampment  3 Epson House, Fairfield Avenue, Staines, Middlesex TW18 4JH	Taylor WS3 para 25, Exhibit CT15  Proposed Defendant was the registered keeper of VRM SN19 GUX at the time of the encampment (see also police spreadsheet)
118	Vanessa Sweeney	SW64 HZZ	Vehicle identified at the encampment  14 Harris Road, Upper Heyford, Bicester, Oxfordshire OX25 5TR	Taylor WS3 para 26, Exhibit CT16  Details confirmed

			Proposed Defendant was the registered keeper of VRM SW64 HZZ at the time of the encampment (see also police spreadsheet)	
119	Eddie Lee	LD63 NSE	52 Liquorice Lane, Woking, Surrey GU22 9NZ	<p>Taylor WS3 para 28, Exhibit CT18</p> <p>Proposed Defendant was the registered keeper of VRM LD63 NSE at the time of the encampment (see also police spreadsheet)</p> <p>Vehicles identified at the encampment</p>
120	Richard John Smith	R55 OYL	4 Attlee Drive, Dartford, Kent DA1 5DE	<p>Taylor WS3 para 28, Exhibit CT18</p> <p>Proposed Defendant was the registered keeper of VRM R55 OYL at the time of the encampment (see also police spreadsheet)</p>

			Vehicle identified at the encampment	
121	Jake Howard	N318 XJW	25 Beards Road, Ashford, Middlesex TW15 1TE	Taylor WS3 para 28, Exhibit CT18  Proposed Defendant was the registered keeper of VRM N318 XJW at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
122	James Price	FV66 VWA	8 Highwood Park, Highwood Road, Patchway, Bristol BS34 5DJ	Taylor WS3 para 28, Exhibit CT18  Proposed Defendant was the registered keeper of VRM FV66 VWA at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
123	Michael Finney	HF70 MGY	2 Station Terrace, Station Road, Sandycroft CH5 2QU	Taylor WS3 para 28, Exhibit CT18  Proposed Defendant was the registered keeper of VRM

			HF70 MGY at the time of the encampment (see also police spreadsheet)	
124	Martin Quilligan	YP11 OTE	93 Armoutry Road, London SE8 4LB	<p>Vehicle identified at the encampment</p> <p>Taylor WS3 para 28, Exhibit CT18</p> <p>Proposed Defendant was the registered keeper of VRM YP11 OTE at the time of the encampment (see also police spreadsheet)</p> <p>Vehicle identified at the encampment</p>
125	James Cooper	ND14 OFO	27 Beards Road, Ashford, Middlesex TW15 1TE	<p>Taylor WS3 para 28, Exhibit CT18</p> <p>Proposed Defendant was the registered keeper of VRM ND14 OFO at the time of the encampment (see also police spreadsheet)</p> <p>Vehicle identified at the encampment</p>

126	James Lee	LM13 BHA	7a Highwood Road, Patchway, Bristol BS34 5DJ	Taylor WS3 para 28, Exhibit CT18	Proposed Defendant was the registered keeper of VRM LM13 BHA at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment	Details confirmed
127	Sophie Hay	MT15 MVL	56 The Crescent, Egham, Surrey TW20 9PH	Taylor WS3 para 28, Exhibit CT18	Proposed Defendant was the registered keeper of VRM MT15 MVL at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment	Details confirmed
128	Tim McDonald	OE63 FNZ	Caravan 18, Sunset Park Homes, Whitfield, Brackley, Northants NN13 5TD	Taylor WS3 para 29, Exhibit CT19	Proposed Defendant was the registered keeper of VRM OE63 FNZ at the time of the encampment (see also police spreadsheet)	Details confirmed

			Vehicle identified at the encampment	
129	Joseph McDonagh	YG08 YEB	Caravan 20, Sunset Park Homes, Whitfield, Brackley, Northants NN13 5TD	Taylor WS3 para 29, Exhibit CT19  Proposed Defendant was the registered keeper of VRM YG08 YEB at the time of the encampment (see also police spreadsheet)
130	John Ward	DU06 JOJ	7 Watling Farm Close, Stammore, Middlesex HA7 4UY	Taylor WS3 para 29, Exhibit CT19  Proposed Defendant was the registered keeper of VRM DU06 JOJ at the time of the encampment (see also police spreadsheet)
131	Charlotte Nevin	AE22 KPA	33 Hereford Road, Luton, Bedfordshire LU4 0PS	Taylor WS3 para 29, Exhibit CT19

			Proposed Defendant was the registered keeper of VRM AE22 KPA at the time of the encampment (see also police spreadsheet)	
132	Simon McDonagh	VA19 HWY	121 Meadow Way, Leighton Buzzard, Bedfordshire, LU7 3XP	Taylor WS3 para 29, Exhibit CT19  Proposed Defendant was the registered keeper of VRM VA19 HWY at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
133	Arthur Stones	NA63 XDN	1 Bridge Street, Barrow Upon Soar, Loughborough LE12 8PN	Taylor WS3 para 18, Exhibit CT8  Proposed Defendant was the registered keeper of VRM NA63 XDN at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment

134	Michael Nevin	RE62 VFP	50 Mushroom Field Road, Northampton, NN3 5AD	Taylor WS3 para 18, Exhibit CT8  Proposed Defendant was the registered keeper of VRM RE62 VFP at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
135	Harry Moore	DK66 VXD	13 Methuen Road, Bournemouth BH8 8NB	Taylor WS3 para 18, Exhibit CT8  Proposed Defendant was the registered keeper of VRM DK66 VXD at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment
136	Andy Bailey	FP09 MTU	28 Woodgate, Leicester LE3 5GE	Taylor WS3 para 18, Exhibit CT8  Proposed Defendant was the registered keeper of VRM FP09 MTU at the time of the



			encampment (see also police spreadsheet) Vehicle identified at the encampment	
137	Kathleen Hanrahan	AU10 TWP	35 Nethermead Court, Northampton NN3 8NE  Proposed Defendant was the registered keeper of VRM AU10 TWP at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment	Taylor WS3 para 18, Exhibit CT8  No further check conducted
138	Tom O'Leary	LB07 AKU	32 Beresford Road, London N8 0AJ  Proposed Defendant was the registered keeper of VRM LB07 AKU at the time of the encampment (see also police spreadsheet)  Vehicle identified at the encampment	Taylor WS3 para 18, Exhibit CT8  No further check conducted



139	Norman Vanscolina	WJ07 WMC	Villa St Christopher, Hesketh, Torquay, Devon TQ1 2LN	Holmes WS1 para 12, Exhibit PH4  Proposed Defendant was the registered keeper of VRM WJ07 WMC at the time of the encampment  Vehicle identified at the encampment	No further check conducted
140	Wayne Cole	RF22 XFN KX05 OSY	27 Hawthorne Crescent, Blackwater, Camberley, Surrey GU17 9DY	Holmes WS1 para 14, Exhibits PH6 and PH7  Proposed Defendant was the registered keeper of VRMs RF22 XFN and KX05 OSY at the time of the encampment  Vehicles identified at the encampment	No further check conducted
141	Tina Wickens	HY61 WNE	43 Middle Way, Burgess Hill, West Sussex RH15 8EA	Holmes WS1 para 14, Exhibits PH6 and PH7  Proposed Defendant was the registered keeper of VRM HY61 WNE at the time of the encampment  Vehicle identified at the encampment	No further check conducted

142	Patrick Oliver McDonagh	SV15 HXD	133 Church Lane, Manchester M9 4WH	Holmes WS1 para 17, Exhibit PH10  Proposed Defendant was the registered keeper of VRM SV15 HXD at the time of the encampment  Vehicle identified at the encampment	No further check conducted
143	Juan Goncalves	YK08 YPP	70 Tweed Road, Slough, Berkshire SL3 8XA	Holmes WS1 para 19, Exhibit PH12  Proposed Defendant was the registered keeper of VRM YK08 YPP at the time of the encampment  Vehicle identified at the encampment	No further check conducted
144	John McDonagh	DU22 UKE	2 Rockfield Park, Belleek, Enniskillen BT93 3GJ	Holmes WS1 para 21, Exhibit PH14  Proposed Defendant was the registered keeper of VRM DU22 UKE at the time of the encampment	No further check conducted

			Vehicle identified at the encampment	
145	Paul Jones	BF58 XLR Essex SS14 1PZ	Holmes WS1 para 21, Exhibit PH14  Proposed Defendant was the registered keeper of VRM BF58 XLR at the time of the encampment  Vehicle identified at the encampment	No further check conducted
146	Martin McDonagh	WIG7235	9 Rockfield Park, Belleek, Enniskillen BT93 3GJ  Holmes WS1 para 21, Exhibit PH14  Proposed Defendant was the registered keeper of VRM WIG7235 at the time of the encampment  Vehicle identified at the encampment	No further check conducted



IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim No. QB-2020-002112

B E T W E E N :

(1) TEST VALLEY BOROUGH COUNCIL  
(2) HAMPSHIRE COUNTY COUNCIL

Claimant

-and-

(1) ALBERT BOWERS  
(2)-(89) OTHER NAMED DEFENDANTS  
(90) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS  
WITHIN THE BOROUGH OF TEST VALLEY

Defendants

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EXHIBIT

KD3

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REFERRED TO IN THE TWELFTH WITNESS STATEMENT OF KAREN  
DUNN

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IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim No. QB-2020-002112

B E T W E E N :

(1) TEST VALLEY BOROUGH COUNCIL  
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Claimant

-and-

(1) ALBERT BOWERS  
(2)-(89) OTHER NAMED DEFENDANTS  
(90) PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS  
WITHIN THE BOROUGH OF TEST VALLEY

Defendants

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SCHEDULE 3

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D No.	Name	Address for service
91	Simon McGinley	134 Alder Street, Newton-Le-Willows, Merseyside WA12 8HP
92	Martina Quilligan	Carousel Park, Basingstoke Road, Micheldever, Winchester, Hampshire SO21 3BW
93	Bridget Quilligan	Carousel Park, Basingstoke Road, Micheldever, Winchester, Hampshire SO21 3BW
94	Linda Barnett	Park Place Nursery Cottage, Titchfield Lane, Wickham PO17 5HB
95	James Galbraith	40 Nevis Grove, Bletchley, Bucks MK2 3NY
96	Steven Jackson	6 Gretsy Buildings, Nantwich, Cheshire CW5 5PX
97	Martin Doherty	31 Thingley Caravan Site, Easton Lane, Wiltshire SN14 0RW
98	Paul Kranjiewski	16 Oaktree Way, Cannington, Bridgewater, Somerset TA5 2RL
99	Paddy Mohan	73 Holloway Road, London N7 8JZ

100	Jayson Stanley	Keepers Yard, Nash Lee Road, Terrick, Aylesbury HP17 0TQ
101	Savanah Carter	Heatherley House, Aldermarston Road, Pamber End, Hampshire RG26 5QN
102	John Mufhy	6 Sandiares Caravan Site, Long Green, Cressing, Essex CM77 8DL
103	Martin McDonagh	13 Castlebalfour Park, Enniskillen BT92 0GD
104	Patrick Collins	LG10 Springfield House, Springfield Street, Barnsley S70 6EQ
105	Charlie McDonagh	9 Rockfield Park, Belleek, Enniskillen BT93 3GJ
106	Willie McDonagh	56 Main Street, Castlederg, County Tyrone BT81 7AN
107	Tony Murphy	6 Sydney Lane, Aughnacloy, Coounty Tyrone BT69 6AF
108	Sarah Crawley	42D the Fairway, Leicester LE26 6LN
109	Charles Ward	7 New Acres, Spade Lane, Sittingbourne, Kent ME9 7TT
110	Mary McDonagh	5 Boggs Cottages, Keele Road, Newcastle, Staffordshire ST5 5AB
111	Sally Ann O'Connor	7 Gisborne Green, Derby DE1 3NA
112	David Moors	79 Towcester Road, Northampton NN4 8LR
113	Nathan Stewart	11 Meynells Gorse, Gold Course Lane, Leicester LE3 1UY
114	James McDonagh	The Woodlands, Rotherham Road, Killamarsh, Sheffield S21 2DS
115	Bridget Quilligan	Annexe Henroost Farm, Old Gloucester Road, Winterbourne, Bristol BS36 1RZ
116	John Mohan	9B Carousel Park, Micheldever, Winchester, Hampshire SO21 3BW
117	Matthew Watts	3 Epson House, Fairfield Avenue, Staines, Middlesex TW18 4JH
118	Vanessa Sweeney	14 Harris Road, Upper Heyford, Bicester, Oxfordshire OX25 5TR
119	Eddie Lee	52 Liquorice Lane, Woking, Surrey GU22 9NZ
120	Richard John Smith	4 Attlee Drive, Dartford, Kent DA1 5DE
121	Jake Howard	25 Beards Road, Ashford, Middlesex TW15 1TE
122	James Price	8 Highwood Park, Highwood Road, Patchway, Bristol BS34 5DJ
123	Michael Finney	2 Station Terrace, Station Road, Sandycroft CH5 2QU
124	Martin Quilligan	93 Armoury Road, London SE8 4LB

125	James Cooper	27 Beards Road, Ashford, Middlesex TW15 1TE
126	James Lee	7a Highwood Road, Patchway, Bristol BS34 5DJ
127	Sophie Hay	56 The Crescent, Egham, Surrey TW20 9PH
128	Tim McDonald	Caravan 18, Sunset Park Homes, Whitfield, Brackley, Northants NN13 5TD
129	Joseph McDonagh	Caravan 20, Sunset Park Homes, Whitfield, Brackley, Northants NN13 5TD
130	John Ward	7 Watling Farm Close, Stanmore, Middlesex HA7 4UY
131	Charlotte Nevin	33 Hereford Road, Luton, Bedfordshire LU4 0PS
132	Simon McDonagh	121 Meadow Way, Leighton Buzzard, Bedfordshire, LU7 3XP
133	Arthur Stones	1 Bridge Street, Barrow Upon Soar, Loughborough LE12 8PN
134	Michael Nevin	50 Mushroom Field Road, Northampton, NN3 5AD
135	Harry Moore	13 Methuen Road, Bournemouth BH8 8NB
136	Andy Bailey	28 Woodgate, Leicester LE3 5GE
137	Kathleen Hanrahan	35 Nethermead Court, Northampton NN3 8NE
138	Tom O'Leary	32 Beresford Road, London N8 0AJ
139	Norman Vanscolina	Villa St Christopher, Hesketh, Torquay, Devon TQ1 2LN
140	Wayne Cole	27 Hawthorne Crescent, Blackwater, Camberley, Surrey GU17 9DY
141	Tina Wickens	43 Middle Way, Burgess Hill, West Sussex RH15 8EA
142	Patrick Oliver McDonagh	133 Church Lane, Manchester M9 4WH
143	Juan Goncalves	70 Tweed Road, Slough, Berkshire SL3 8XA
144	John McDonagh	2 Rockfield Park, Belleek, Enniskillen BT93 3GJ
145	Paul Jones	11 Clayburn Circle, Basildon, Essex SS14 1PZ
146	Martin McDonagh	9 Rockfield Park, Belleek, Enniskillen BT93 3GJ

