

IN THE HIGH COURT OF JUSTICE

Claim no. KB 2025-002184

BETWEEN:-

RUSHMOOR BOROUGH COUNCIL

Claimant

-V-

PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED ENCAMPMENTS IN
THE BOROUGH OF RUSHMOOR

Defendants

Application Bundle

A. Application to Extend

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A. Application to Extend

N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

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Name of court High Court of Justice	Claim no. KB-2025-002184
Fee account no. (if applicable) PBA0094417	Help with Fees - Ref. no. (if applicable) H W F - [] [] [] - [] [] []
Warrant no. (if applicable)	
Claimant's name (including ref.) Rushmoor Borough Council (Ref. ME/4957)	
Defendant's name (including ref.) Persons Unknown	
Date	02/09/2025

1. What is your name or, if you are a legal representative, the name of your firm?

Rushmoor Borough Council

2. Are you a Claimant Defendant Legal Representative

Other (please specify) [] [] [] [] [] [] [] [] [] [] [] []

If you are a legal representative whom do you represent?

The Claimant

3. What order are you asking the court to make and why?

In accordance with paragraphs 9-11 inclusive of the Order of Mr Justice Calver the Claimant seeks an order continuing the injunction Order dated 24th June 2024 for a period of 1 year to 23 September 2026 against the Defendant.

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with? at a hearing without a hearing

at a remote hearing

6. How long do you think the hearing will last? Hours Minutes

Is this time estimate agreed by all parties?

Yes No

7. Give details of any fixed trial date or period

19 September 2025

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

[] [] [] [] [] [] [] [] [] [] [] []

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

Service in accordance with paragraph 6 of the Order of Mr Justice Calver dated 24th June 2025.

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

Please see the following witness statements filed with this application.

- Third Witness Statement of Helen Payne
- First Witness Statement of Matthew Edwards

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

- I believe that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year								
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0	2									
0	9									
2	0	2	5							

Full name

Matthew Edwards

Name of applicant's legal representative's firm

Rushmoor Borough Council

If signing on behalf of firm or company give position or office held

Litigation and Regulatory Solicitor

Applicant's address to which documents should be sent.

Building and street

Council Offices

Second line of address

Farnborough Road

Town or city

Farnborough

County (optional)

Hampshire

Postcode

G	U	1	4	7	J	U
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If applicable

Phone number

01252 398 602

Fax phone number

DX number

Your Ref.

ME/4957

Email

legal@rushmoor.gov.uk

B. Witness Statements

IN THE HIGH COURT OF JUSTICE

Claim no. KB 2025-002184

BETWEEN:-

RUSHMOOR BOROUGH COUNCIL

Claimant

-V-

PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED ENCAMPMENTS IN
THE BOROUGH OF RUSHMOOR

Defendants

THIRD WITNESS STATEMENT OF HELEN PAYNE

I, HELEN PAYNE, Principal Environmental Health Officer at Rushmoor Borough Council of Farnborough Road, Farnborough, GU14 7JU, WILL SAY as follows:

1. I am currently employed as the Principal Environmental Health Officer for the Claimant. I have been in my current role since November 2007 working within the Claimant's Environmental Health Team. In my current role, I am responsible for responding to unauthorised Traveller encampments on Council-owned land. I have prepared two separate Witness Statements both dated 23 June 2025 which provided background information for the Claimant's original injunction application dated 24 June 2025. This includes complaints of "nuisance" from neighbouring residents and businesses of noise, rubbish, damage, anti-social behaviour and other issues relating to unauthorised Traveller encampments.
2. Except where I state otherwise, the facts in this statement are true to the best of my knowledge, information and belief. Where it appears that my knowledge has come from another source, then I believe that source and the facts gained from there to be true. This statement has been prepared with the assistance of the Claimant's legal services team. I am aware of the duty for full and frank disclosure.

3. I make this statement in support of my previous Witness Statements. I am duly authorised by the Claimant to make this statement on its behalf and in support of the Claimant's application for the continuation of the injunctive relief granted against persons unknown who are forming unauthorised encampments in the Borough of Rushmoor by way of the Order of Mr Justice Calver dated 24 June 2025 ("the **Injunction**") which will expire by effluxion of time at 00:00hrs on 24 September 2025.
4. Specifically, the Claimant, by way of this application, seeks to extend the relief granted against persons unknown who are forming unauthorised encampments in the Borough of Rushmoor until 24 September 2026.
5. The application is made pursuant to section 187B of the Town and Country Planning Act 1990 and section 222 of the Local Government Act 1972.
6. The Injunction is supported by a power of arrest, granted pursuant to section 27 of the Police and Justice Act 2006.

THE INJUNCTION

7. This application is brought by the Claimant, who is the local authority, against Persons Unknown who are forming unauthorised encampments within the Claimant's administrative area.
8. As I have summarised above, the application seeks to continue the relief granted by way of the Injunction a copy of which I exhibit as **HP3/1**. The Injunction prohibits the Defendants from:
 - a. Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans or mobile homes and the storage of vehicles, caravans and residential paraphernalia, except where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from

the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.

- b. Setting-up an encampment on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, except where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).
 - c. Setting-up an encampment on any part of the Land (as defined below) without Written Permission from the Local Planning Authority (as defined below), or planning permission granted by the Secretary of State or in accordance with statutory permitted development rights.
 - d. Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans or mobile homes other than when driving through the highways on the Land or in compliance with parking orders regulating the use of car parks or with the express permission from the owner of the Land, except where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
 - e. Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.
9. 'the Land' is defined in paragraph 4 of the order by reference to the maps annexed at Schedule 1 of the order. As I shall explain further below, the Land is predominantly public open space with high amenity and recreational value.
10. The Injunction is supported by a power of arrest granted pursuant to Section 27 of the Police and Justice Act 2006. As I shall explain further below, the power of arrest ensures

the Injunction is effective and is required because the conduct of the Defendants has previously consisted of the threatened use of violence and causes a significant risk of harm against the persons who suffer nuisance or annoyance from the Defendants' conduct.

PERSONS UNKNOWN FORMING UNAUTHORISED ENCAMPMENTS

Gypsies and Travellers

11. As I expressed at paragraph 5 of my First Witness Statement, while this application is not intended to single out any one particular group, it would not be credible if I did not observe that people of the Travelling Community are most likely to be affected by the injunctive relief being sought.
12. As I also expressed at paragraphs 6 to 9 of my First Witness Statement dated 23 June 2025, I am also aware that the Human Rights Act 1998 and the Equality Act 2010 recognises and protects the rights and nomadic lifestyle of the Travelling Community and I recognise that this lifestyle includes transit stopping.
13. In light of the above, the Claimant recognises the need to find an appropriate and balanced and proportionate response to the negative impacts of unauthorised encampments to minimise that impact on the settled community and Council-owned land whilst at the same time ensuring it protects the rights of the gypsy and traveller community in accordance with the Equality Act 2010 and The Human Rights Act 1998.
14. The Claimant has a duty to assess the need for Traveller sites and provide sites for the Travelling Community in their local development plans.
15. Although the most recent assessment did not identify a sufficient level of internally generated need for Traveller sites, the Claimant is currently reviewing this as part of the development and public consultation for the updated Local Development Plan. As part of this process, the Claimant will take appropriate steps to ensure that any site provision recommended by the assessment is delivered.

Children

16. As expressed at paragraphs 14 to 17 of my First Witness Statement, I am also aware of the requirement to have particular regard to the enhanced protection that children are entitled to pursuant to the Children Act 1989 and Article 3 of United Nations Convention on the Rights of the Child. This requires the best interests of the child shall be a primary consideration.
17. The rights of Travellers and their children on the site must be balanced against the rights and entitlements of the local residents and businesses affected by Traveller movements and the adverse effect that unlawful encampments has on the Borough in both financial terms, including the cost to the Council of remediation and the cost to businesses who close due to nearby encampments or incur additional costs such as securing their premises, and in non-financial terms, including the cost to community relations, anti-social behaviour experienced by residents and preventing the legitimate use of the land for recreational space.
18. Furthermore, it must be acknowledged that the impact of unauthorised encampments, (which I outline below) also affect children in the Borough as they have reduced access to sports and play infrastructure and are more vulnerable to the public health risks which occur from improper sanitation.

THE GEOGRAPHICAL LIMITS OF THE INJUNCTION

19. The Claimant is not seeking to prevent encampments in the Borough altogether or more generally but is instead concerned about encampments being formed on sites of particular value. As such, the relief that has been granted, and which the Claimant seeks to continue, is targeted on the Land.
20. The nature of the sites that falls within the Land means that greater harm would be suffered if encampments were to be formed there.
21. The Claimant also notes that much of the space in the Borough which may be vulnerable to encampments is not covered by the injunctive relief and that much of the land within

the Borough is not within the control of the Claimant. This includes significant amounts of green space controlled by developers or the Ministry of Defence.

22. As expressed in my First Witness Statement, the Land is predominantly areas of Public Open Space. I outline the uses of these sites below:

The Site	Use
<p>Land at Aldershot Park, Guildford Road, Aldershot (including Aldershot Park, Aldershot Pools Complex & Lido, Aldershot Crematorium, Aldershot Cricket Club)</p>	<p>The land at Aldershot Park consists of playing fields which are used by:</p> <ul style="list-style-type: none"> • Aldershot and Fleet Rugby Club, • Aldershot Boys and Girls FC • Aldershot Cricket Club • Blackwater Valley Runners <p>Unauthorised encampments frequently disrupt ongoing fixtures and result in planned fixtures being cancelled due to the encampments being either directly on the sport pitches or players not feeling comfortable being on the grounds whilst the encampments is present. Fixtures are often held weekly during the respective sports seasons particularly at weekends.</p> <p>And the carparks of:</p> <ul style="list-style-type: none"> • Rushmoor Gymnastics Academy • Aldershot Pools and 5-a-side pitches <p>Parts of the land at Aldershot Park is held in trust by the Claimant on behalf of the Recreation Ground Trust for the ‘recreation of... the inhabitants of Aldershot.’</p>

	<p>The land at Aldershot Crematorium is particularly sensitive due to the nature of the site being used mourners to attend the grounds.</p>
<p>Manor Park, Church Hill, Aldershot</p>	<p>Manor Park is a large park used by residents of the borough for their recreation. This includes play infrastructure which is utilised by children up to the ages of 12 years old; a skate park which was installed with Sport England funding and newly refurbished tennis courts.</p>
<p>Ivy Road Recreation Ground, Ivy Road, Aldershot</p>	<p>Ivy Road Recreation Ground contains a flood-lit multi use games area as well as play infrastructure.</p> <p>The site also adjoins the Blackwater river and is bordered by the Blackwater Valley country path.</p>
<p>Napier Gardens and Car Park, Redvers Buller Road, Aldershot</p>	<p>Napier Gardens is a grassed area which contains a large pond which the Claimant manages as a wildlife habitat.</p>
<p>King George V Playing Field, Sycamore Road, Farnborough</p>	<p>King George V Playing Fields is a large park which contains significant play infrastructure. The playing fields are used predominantly by the Rushmoor Knights American Football Team as well as other local sports teams.</p>

	<p>King George V Playing Fields also is used to host long standing community events including Picnic in the Park and the Donkey Derby.</p>
<p>Southwood County Park, Playing Fields, Car parks, Ively Road, Farnborough</p>	<p>Southwood Country Park is a Suitable Alternative Natural Greenspace which is required pursuant to the Conservation of Habitats and Species Regulations 2017 to mitigate harm to the ground nesting birds in the Thames Basin Heath Special Protection Area by providing a space for residents of the Borough to walk in.</p> <p>Southwood Playing Fields are home to Rushmoor Community Football Club during the football season and Cove Cricket Club during the summer months.</p> <p>The Site is also near to Cove Valley and Cove Brook both of which are designated Site of Importance for Nature Conservation (“SINCs”).</p>
<p>Southwood Village Green, Summit Avenue, Farnborough</p>	<p>Southwood Village Green is a grassed area adjacent to the local infants school which has a high amenity value.</p>
<p>Nightingale Close, Farnborough (Land to the east of Minley Road)</p>	<p>The Land to the east of Minley Road is a grassed area which is used by the residents of Nightingale Close and neighbouring roads for recreation.</p>
<p>Moor Road Playing Field, Moor Road, Farnborough</p>	<p>Moor Road Playing Fields contains football and cricket pitches which are available to be booked by local sports team.</p>

	Moor Road Playing Fields also consists of play infrastructure for children up to 14 years of age, a multi-use games area, a BMX track and outdoor gym equipment.
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23. The sites outlined above all have significant value and are consistently used by residents of the Borough, including children of all ages, for sports and recreation. This improves the physical health and mental health of the residents of Rushmoor. Previous encampments on these sites have disrupted sports matches and meant that the inhabitants of the Borough cannot or do not feel comfortable using or accessing those sites.
24. The remaining sites are car parks which have community value or which the occupation of by an unauthorised encampment would have significant impacts on the residents and businesses of the Borough. This includes Union Street West Car Park which is relied on by residents of Farnborough as a commuter car park.
25. The nature of all the sites comprising the Land mean that they would not be appropriate for encampments and therefore a change of use to residential accommodation would be a material breach of planning control which would require restraining.
26. All the sites which form part of the Land have been targeted by unauthorised encampments and therefore it is reasonable to apprehend that a further breach of planning control may occur if the injunctive relief was not extended. The Claimant does not seek to extend the injunction beyond the terms which Mr Justice Calver considered to be appropriate in granting the injunction on 24 June 2025.

IMPACT OF UNAUTHORISED ENCAMPMENTS

27. As I have expressed above, the nature of the sites forming the Land mean that unauthorised encampments on those sites are extremely disruptive to residents of the Borough.

28. In my First Witness Statement I outline some of the impacts of unauthorised encampments. These can be summarised under the headings, risk to public health, noise nuisance, damage to property, threats and intimidation and financial impact. I detail these impacts below.

Risk to Public Health

29. Improper sanitation can cause spread of disease including dysentery, typhoid, E.coli and intestinal worm infections.
30. These diseases can cause serious and sometimes fatal illness particularly in children or adults with vulnerabilities.
31. As expressed in my First Witness statement despite the Claimant providing them with waste bags, often unauthorised encampments leave human and animal waste on sites. I also outline in my Second Witness Statement that the Claimant has received complaints regarding occupiers of unauthorised encampments deliberately taking dog poo bags and ‘throwing them on the field and road’. I exhibit this as **HP13** to my second statement.
32. As much of the Land is open space upon which are used by sports clubs and children to play, this could cause significant health implications to those using the sites for these reasons and puts them at significant risk of harm.
33. It should also be noted that the Claimant often receives reports of vehicles being driven at high speed across the sites when there is an unauthorised encampment occupying them. Given the nature of the majority of the sites means they are often used by children, vehicles driving at speed where regular users would not expect to find them puts the other users of the Land at significant risk of harm.

Noise Nuisance

34. Unauthorised encampments often generate significant amounts of noise from both their occupiers and from generators and other machinery.

35. The temporary and transitory nature of the encampments means that the Claimant cannot effectively use their powers under section 79 of the Environmental Protection Act 1990 to investigate any complaint.
36. The Claimant is also aware that on the occasions that residents of the Borough have approached the occupiers asking them to be quieter they have felt threatened and intimidated by the occupier's responses and reactions. This is outlined in my Second Witness Statement and exhibited as **HP11** and **HP12** to that statement

Damage to Property

37. As I express in my Second Witness Statement, it is common for significant damage to be done to property by occupiers of unauthorised encampments.
38. This occurs to property which the encampment occupies and often to land around the Borough including that which is owned by local businesses.
39. Occupiers of the encampments often commit criminal damage in order to enter onto the land which they occupy. The sites are also usually inappropriate for heavy vehicles to be driven over them which can therefore cause damage to the land. The nature of many of the sites means that this can damage sports infrastructure which means that there is significant cost implications in repairing the land.
40. The damage caused to property also often leaves spaces in unsafe conditions. Examples of this include the damage to a children's playpark which left nails exposed (exhibited as HP10 to my Second Witness Statement and noted in paragraph 4 of the same) or glass being left on playing fields which may wound the normal users of those fields.

Threats and Intimidation

41. I am aware that often residents of the Borough feel intimidated by the presence of an unauthorised encampment and this means that they may make changes to their day-to-day lives to avoid the site on which the encampment has been formed.
42. I am also aware that residents have reported being or feeling threatened or being subjected to abusive by the occupiers of the unauthorised encampments. Most recently

the Claimant received a report that a local resident tried to ask persons who were attempting to form an unauthorised encampment to not enter the site and was sworn at and told to go away. The exchange ‘left [the resident] feeling threatened and intimidated.’ I exhibit the report of this which the Claimant received as **HP3/2**.

43. I understand that the damage to property outlined above and in my Second Witness Statement increases residents feeling of intimidation.

Financial Impact

44. The Claimant has had to spend significant amounts of money on legal fees, court application costs, site clean up and site protection measures in regard to removing and remediating encampments.
45. In relation to encampments in Aldershot alone this expenditure between June 2020 and June 2025 was £31,525.33.
46. This does not account for significant officer time involved or for remediating any damage to other sites which may have been caused by the occupiers of the unauthorised encampments.
47. The Claimant is also aware that local businesses and sports clubs have had to spend significant amounts of money repairing and remediating their land and property as well as losing income due to cancelled sports matches, residents being too intimidated to use the businesses and theft.

SUCCESS OF THE INJUNCTIVE RELIEF

48. The Injunction was granted in order to restrain an actual breach of planning control arising from an unauthorised encampment at Southwood Playing Fields (“the **Southwood Encampment**”) and to restrain an apprehended breach of planning control on the Land from future unauthorised encampments pursuant to Section 187B of the Town and Country Planning Act 1990.

49. The continuation of the relief is intended to restrain further apprehended breaches of planning control on the Land.
50. In response to the Southwood Encampment, the Defendants left Southwood Playing Fields prior to 10AM on the 25 June 2025 and moved outside of the Claimant's administrative area.
51. An unauthorised encampment cut locks on the gates and pulled onto Southwood Playing Fields at approximately 20:00 on the 25 August 2025. This was witnessed on CCTV by the club chairman of Rushmoor Community Football Team.
52. The club chairman estimated that the unauthorised encampment consisted of fifty vehicles and twenty caravans with more attempting to enter the land.
53. In response to this Hampshire Constabulary attended the site and informed the newcomers of the Injunction. Upon being informed of the Injunction the newcomers vacated the site within 2 hours of pulling on.
54. The Claimant submits that the attempted encampment of 25 August 2025 provides evidence that it is it likely and reasonable to apprehend that, if the injunctive relief was not continued that there would be further breaches of planning control.

Alternative Enforcement Methods

55. The Council has considered alternative measures to injunctive relief that could be used to prevent and manage the formation of unauthorised encampments on the Land. Those methods include the use of byelaws, use of removal orders and Public Space Protection Orders ('PSPOs'). Whilst the Claimant has carefully considered the effectiveness and viability of these alternatives it does not consider that any of the options adequately prevent or address the harms of unauthorised encampments.

Public Space Protection Orders

56. A PSPO is punitive in nature, with fines or a prosecution the result of non-compliance. The Claimant does not seek to punish Travellers for their way of life, but to restrain them from breaching planning control in a way that causes significant adverse effects to local residents.
57. To introduce a PSPO the council must comply with the statutory requirements relating to consultation, publicity and notification. A PSPO cannot be implemented in an expedient manner, nor can it be amended to reflect changing circumstances. If the Claimant were to implement a PSPO over a limited area of land, but an encampment were to form outside of this area, the Claimant would not be able to react with speed to tackle the problem behaviour. In comparison the Claimant would be able to seek a variation to the existing injunction address an area were it to be repeatedly subject to unauthorised encampments.
58. Furthermore, the remedy for a breach of a PSPO is the issuance of a Fixed Penalty Notice. This is not an appropriate measure to require or encourage an encampment to move on meaning that any negative impact on the local community would remain. The transient nature of unauthorised encampments also means that it may be challenging to issue and enforce Fixed Penalty Notices meaning this is not an effective remedy.
59. It should also be noted that as I outline at paragraph 17 of my First Witness Statement, in my experience the occupiers of unauthorised encampments often refuse to provide a full name or provide unreliable information regarding their names. This further weakens the effectiveness of a Fixed Penalty Notice.
60. Where a PSPO is breached persistently and multiple Fixed Penalty Notices have been issued the Claimant would be justified in issuing a summons to Court however this would rely on the Fixed Penalty Notices being served effectively and in the period in which the persistent breach occurs it is likely that local residents and businesses would significantly harmed.

Byelaws

61. The Claimant considers the many of the reasons as to why the use of PSPOs are not suitable for dealing with unauthorised encampments also apply to the use of byelaws for the same purpose. The enforcement of a byelaw does not include the power to move on an encampment, with a fixed penalty notice again being the primary method of enforcement.

Removal Orders

62. Prior to seeking injunctive relief, the Claimant has often served a Direction Notice in accordance with s77 Criminal Justice and Public Order Act 1994 requiring the occupiers to vacate the land.
63. The Claimant has noted that this has become an increasingly ineffective tool resulting in the Environmental Health and Legal Services are dedicating significant time to tackle unauthorised encampments.
64. In the time it takes to obtain a removal order the encampment has often moved on whilst the amenity of the site has been significantly adversely affected through littering, damage to the land and cancellation of sporting fixtures. Service of the Direction Notice has led to the site moving outside of the specified area on multiple occasions, requiring the process to be restarted.
65. This results in significant and wasted costs to the Claimant, an elongated period of harm to the local community and can simply mean that two or more sites must then be repaired and remediated.

POWER OF ARREST

66. As I have outlined above, a power of arrest was attached to the Injunction pursuant to section 27 of the Police and Justice Act 2006.
67. This is because the Defendant's previous behaviour has included the threat of violence and has caused a significant risk of harm to persons in the Borough.

68. I have expressed in my Second Witness Statement and at paragraphs 41 to 43 of this statement that the residents of the Borough have reported experiencing verbal abuse and threats from occupiers of unauthorised encampments and have felt significantly threatened by some of those occupiers.
69. I have also expressed in my First Witness Statement and outlined above that unauthorised encampments cause a significant risk of harm through:
- a. improper sanitation potentially causing spread of disease; (Paragraphs 29 to 32 above)
 - b. driving vehicles where regular users would not expect them, including often driving those vehicles at speed (Paragraph 33 above)
 - c. causing criminal damage which leaves property in an unsafe condition (Paragraph 40 above)
70. I also believe that the power of arrest ensures that the Injunction is effective and that this was in part why the encampment of the 25 August 2025 vacated the site within 45 minutes of Hampshire Constabulary arriving. The Police were able to effectively educate those in breach of the injunction and provide advice to move on. The power of arrest is a last resort to secure an effective formal enforcement of the Injunction, if required.
71. The Claimant anticipates on occasions where the injunction may be breached this approach would result in resulted in the occupants moving on voluntarily once provided with advice by a Council officer or the Police.
72. The Claimant is grateful to Mr Justice Calver for granting the power of arrest in conjunction with the Injunction. In light of the circumstances and reasons outlined above, the Claimant seeks the continuation of the associated power of arrest alongside the injunctive relief to ensure the ongoing effectiveness of the remedy and to protect the inhabitants of the Borough.

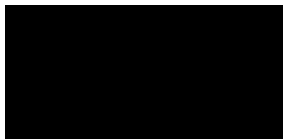
CONCLUSION

73. The threat of unauthorised encampments breaching planning control has not ceased following the granting of the interim injunction as recently demonstrated by the attempted encampment on 25th August 2025. In light of the above, the Claimant seeks the continuation of the injunctive relief granted by Mr Justice Calver on the 24 June 2025.
74. The Claimant believes that the injunctive relief has been an effective way of restraining and preventing unauthorised encampments which breach planning control and have a significantly negative impact on the Borough, its residents and its businesses.
75. The Claimant has considered other methods of enforcement however those methods are ineffective and also come at considerable cost to the public purse. .
76. The Claimant therefore considers that the extension of the injunctive relief until 24 September 2026 is just, convenient and expedient for the promotion and protection of the interests of the inhabitants of the Borough.

I believe that the facts stated in this 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.

Dated the 02 day of September 2025

Signed:



**Helen Payne
Principal Environmental Health Officer**

BEFORE THE HONOURABLE MR JUSTICE CALVER
DATED 24 JUNE 2025

B E T W E E N:

PENAL NOTICE

**IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER YOU
MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR
HAVE YOUR ASSETS SEIZED.**

RUSHMOOR BOROUGH COUNCIL

-and-



KB-2025-002184

**PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR**

Defendant

INJUNCTION

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

UPON HEARING Counsel for the Claimant, Ms Sioned Davies

AND UPON the Claimant's without notice application by Application Notice dated 23 June 2025

AND UPON the Claimant's confirmation that this Order is not intended to prohibit lawful use of the application land

IT IS ORDERED THAT:

A. INJUNCTION ORDER

1. The Defendants and each of them are ordered to remove any caravans or mobile homes and to cease the storage of any vehicles, caravans, and residential paraphernalia on the Injunction Land, by **10 am on 25 June 2025**.
2. After 10am on 25 June 2025 and until 23 September 2025 unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:
 - a. Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans or mobile homes and the storage of vehicles, caravans and residential paraphernalia, except where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
 - b. Setting-up an encampment on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, except where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).
 - c. Setting-up an encampment on any part of the Land (as defined below) without Written Permission from the Local Planning Authority (as defined below), or planning permission granted by the Secretary of State or in accordance with statutory permitted development rights.
 - d. Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans or mobile homes other than when driving through the highways on the Land or in compliance with parking orders regulating the use of car parks or with the express permission from the owner of the Land, except where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
 - e. Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.
3. There shall be a power of arrest attached to paragraphs 2(a) to (e) (inclusive) of this Order
4. The 'Land' in this Order means all land within the Borough of Rushmoor marked within the redline on the attached map in Schedule 1 of the Order
5. The 'Injunction Website' means a website hosted at: www.rushmoor.gov.uk/injunctionapplication. The Injunction Website shall have a QR Code link.

B. SERVICE

6. Pursuant to CPR r6.27 and r.8.14:
 - a. The Claimant shall serve this Order upon the Defendants by each of the following methods:
 - i. Personal service as described in paragraph 6b below.
 - ii. Advertising the existence of this Order in the Hampshire Independent and in particular, with a link to the Injunction Website, which will contain a direct link to this Order and the accompanying documents.

- iii. The Claimant shall use reasonable endeavours to place advertisements on local notice boards managed by the Claimant which shall contain a direct link to this Order and the accompanying documents.
 - iv. Publishing social media posts on the Claimant's Facebook and LinkedIn pages, providing a link to the Injunction Website which will contain a direct link to the Order and the accompanying documents.
 - v. Affixing copies (as opposed to originals) of this Order in a transparent envelope, or laminated copy, in a prominent position on or close to all adopted highway entry points within the area marked with the red line on the map attached at Schedule 1 with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from Rushmoor Borough Council, Council Offices, Farnborough Rd, Farnborough GU14 7JU.
 - vi. Advertising the existence of this Order in a prominent location on the Injunction Website, together with a link to download an electronic copy of this Order.
- b. Service of this Order on Defendants in occupation on the Injunction Land may be effected by personal service where practicable and/or posting a copy of this Order through the letterbox. If there is no letterbox, then a package containing this Order may be affixed to or left at the front door or other prominent feature marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in prominent lettering in the form set out in Schedule 2. It is open to any Defendant to contact the Claimants to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed or left at the front door or other prominent feature.

7. Service of this Order shall be:

- a. Verified by certificates of service to be filed with the Court; and
- b. Be good and sufficient service of this Order on the Defendants and each of them.

C. LIBERTY TO APPLY

8. The Defendants or anyone notified of this Order may each of them apply to the Court on 48 hours prior written notice (without prejudice to the right of that person to apply to shorten the time for service) to both the Court and the Claimants to vary or discharge this Order (or so much of it as affects that person). The contact details for both the Court and the Claimant can be found in paragraphs 21-22 below.

D. RENEWAL OF THIS ORDER

9. This Order against the Defendants will expire by effluxion of time at 00:00 hrs on 24th September 2025. The Claimants may, if so advised, apply for the renewal of the Order against the Defendants ("the Renewal Application"). Any Renewal Application and evidence in support must be filed and served in accordance with paragraph 4 above by 4pm on **2nd September 2025**

10. A hearing shall be listed on **19 September 2025** with a time estimate of 1 day, at which the Renewal Application shall be considered. If the Claimants do not make a Renewal Application,

they must notify the Court as soon as reasonably practicable and seek to vacate the hearing. If the time estimate for the hearing should change the Court must be immediately notified of that fact.

11. Any person other than the Claimant who would like to participate in the hearing of the Renewal Application must also file on the Claimant any evidence upon which they seek to rely at the hearing of the Renewal Application by 4pm on **12 September 2025**.

E. COSTS

12. No order as to costs.

GUIDANCE NOTES

EFFECT OF THIS ORDER

13. A Defendant who is an individual who is ordered not to do something must not do it himself or herself or in any other way. He or she must not do it through others acting on his or her behalf or on his or her instructions or with his or her encouragement.
14. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

15. It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

INTERPRETATION OF THIS ORDER

16. In this Order, where there is more than one Defendant, unless otherwise stated, references to “the Defendants” means each or all of them.
17. A requirement to serve on “the Defendants” means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.
18. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
19. ‘**Controlled waste**’ has the same meaning as within s.75(4) of the Environmental Protection Act 1990.
20. ‘**Written Permission from the Local Planning Authority**’ includes, but is not limited to, written permission granted pursuant to any negotiated stopping agreement, policy or procedure.

COMMUNICATIONS WITH THE COURT

21. All communication to the Court about this Order should be sent to kbjudgeslistingoffice@justice.gov.uk, The Royal Courts of Justice, Strand, London WC2A 2LL. The telephone number is 020 3938957. 21.
22. All communications to the Claimants about this Order should be sent to legal@rushmoor.gov.uk

Power of arrest

Name of defendant

Persons Unknown

Defendant's address

N/A

Name of court High Court of Justice	Claim No.
Claimant's name (including ref.) Rushmoor Borough Council (Ref. ME/4957)	
Defendant's name (including ref.) Persons Unknown	

Seal

Date order made

2 3 / 6 / 2 0 2 5

Name of judge

Order made under

(insert statutory provision)

s222 of the Local Government Act 1972 and s187B of the Town and Country Planning Act 1990

This order includes a power of arrest under (insert statutory provision)

s27 of the Police and Justice Act 2006

The relevant paragraphs of the order to which a power of arrest has been attached are:

(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

Paragraphs 1(a) to 1(e) of the Order of the Honourable Mr Justice Calver of 24 June 2025

This power of arrest was ordered on 2 3 / 6 / 2 0 2 5 and expires on the 2 3 / 9 / 2 0 2 5

Note to Arresting Officer

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant

Rushmoor Borough Council

Claimant's address

Council Offices, Farnborough Road, Farnborough, GU14 7JU

Claimant's phone number

01252 398 399

Print form

Reset form

**BEFORE THE HONOURABLE MR JUSTICE CALVER
DATED 24 JUNE 2025**

B E T W E E N:

RUSHMOOR BOROUGH COUNCIL

Claimant

-and-

**PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR**

Defendant

POWER OF ARREST

This power of arrest applies to the Defendant (Persons Unknown who are forming unauthorised encampments in the Borough of Rushmoor).

The relevant paragraphs of the order to which the power of arrest has been attached are paragraphs 2(a)-(e) (inclusive) of the Order of the Honourable Mr Justice Calver dated 24 June 2025:

Until and including 23rd September 2025, the Defendants are **forbidden** from:

- a. Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans or mobile homes and the storage of vehicles, caravans and other residential objects, except where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
- b. Setting-up an encampment on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, except where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).
- c. Setting-up an encampment on any part of the Land (as defined below) without Written Permission from the Local Planning Authority (as defined below), or planning permission

granted by the Secretary of State or in accordance with statutory permitted development rights.

- d. Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans or mobile homes other than when driving through the highways on the Land or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the Land, except where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
- e. Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.

2. There shall be a power of arrest attached to paragraphs 2(a) to (e) (inclusive) of this Order.

3. The 'Land' in this Order means all land within the Borough of Rushmoor marked within the red line on the attached map in Schedule 1 to this Order.

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: KB-2025-002184

**BEFORE THE HONOURABLE MR JUSTICE CALVER
DATED 24 JUNE 2025**

B E T W E E N:

RUSHMOOR BOROUGH COUNCIL

Claimant

-and-

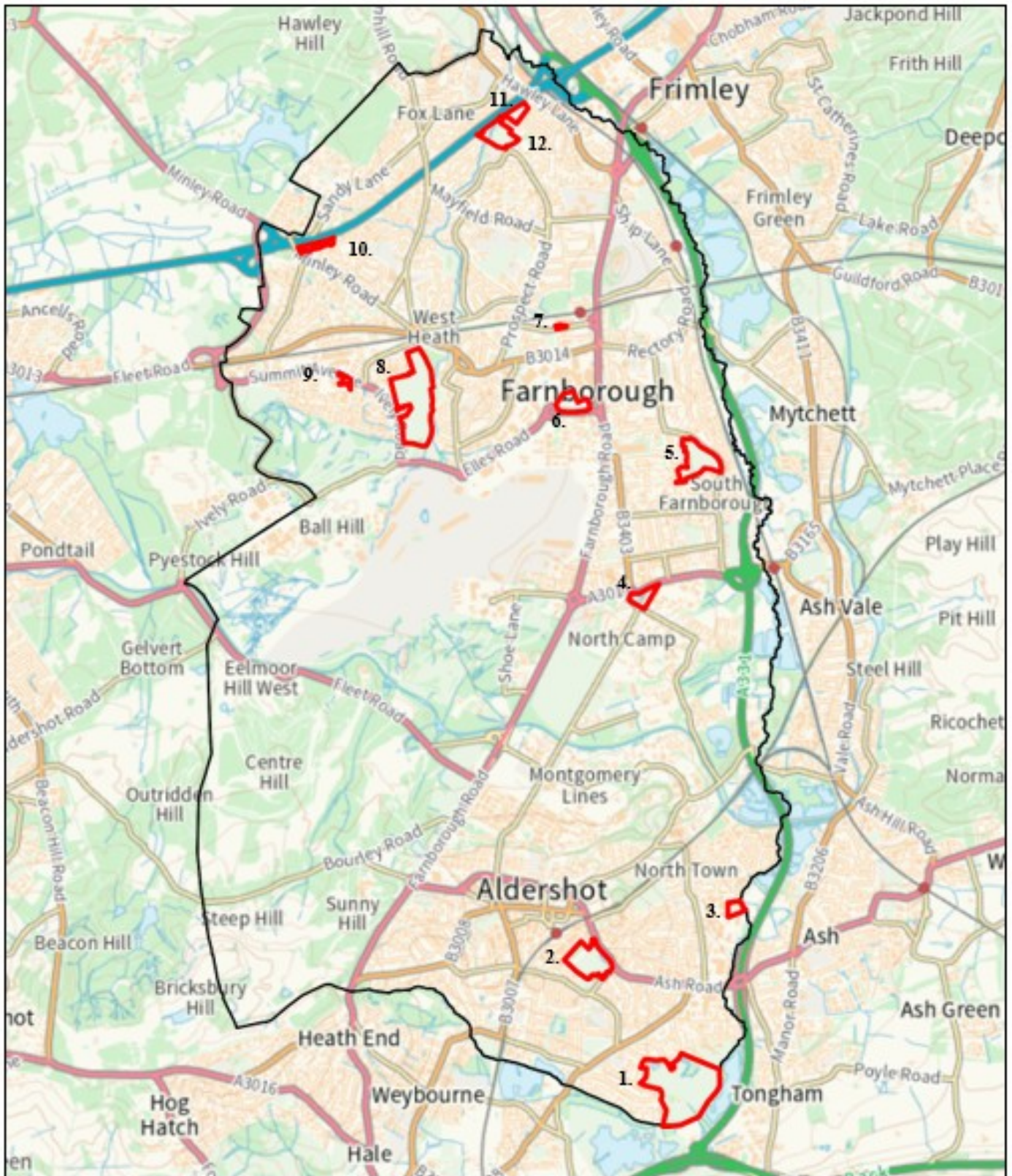
**PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR**

Defendant

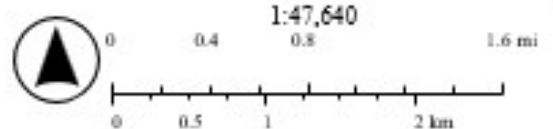
SCHEDULE 1: SITE ADDRESSES AND RED LINE PLANS

	Site Address
1	Land at Aldershot Park, Guildford Road, Aldershot (including Aldershot Park, Aldershot Pools Complex & Lido, Aldershot Crematorium, Aldershot Cricket Club)
2	Manor Park, Church Hill, Aldershot
3	Ivy Road Recreation Ground, Ivy Road, Aldershot
4	Napier Gardens and Car Park, Redvers Buller Road, Aldershot
5	King George V Playing Field, Sycamore Road, Farnborough
6	Farnborough Leisure Centre car park, Westmead, Farnborough
7	Union Street West car park, Union Street, Farnborough
8	Southwood County Park, Playing Fields, Car parks, Ively Road, Farnborough
9	Southwood Village Green, Summit Avenue, Farnborough
10	Nightingale Close, Farnborough (Land to the east of Minley Road)
11	Land at Hawley Lane, Farnborough
12	Moor Road Playing Field, Moor Road, Farnborough

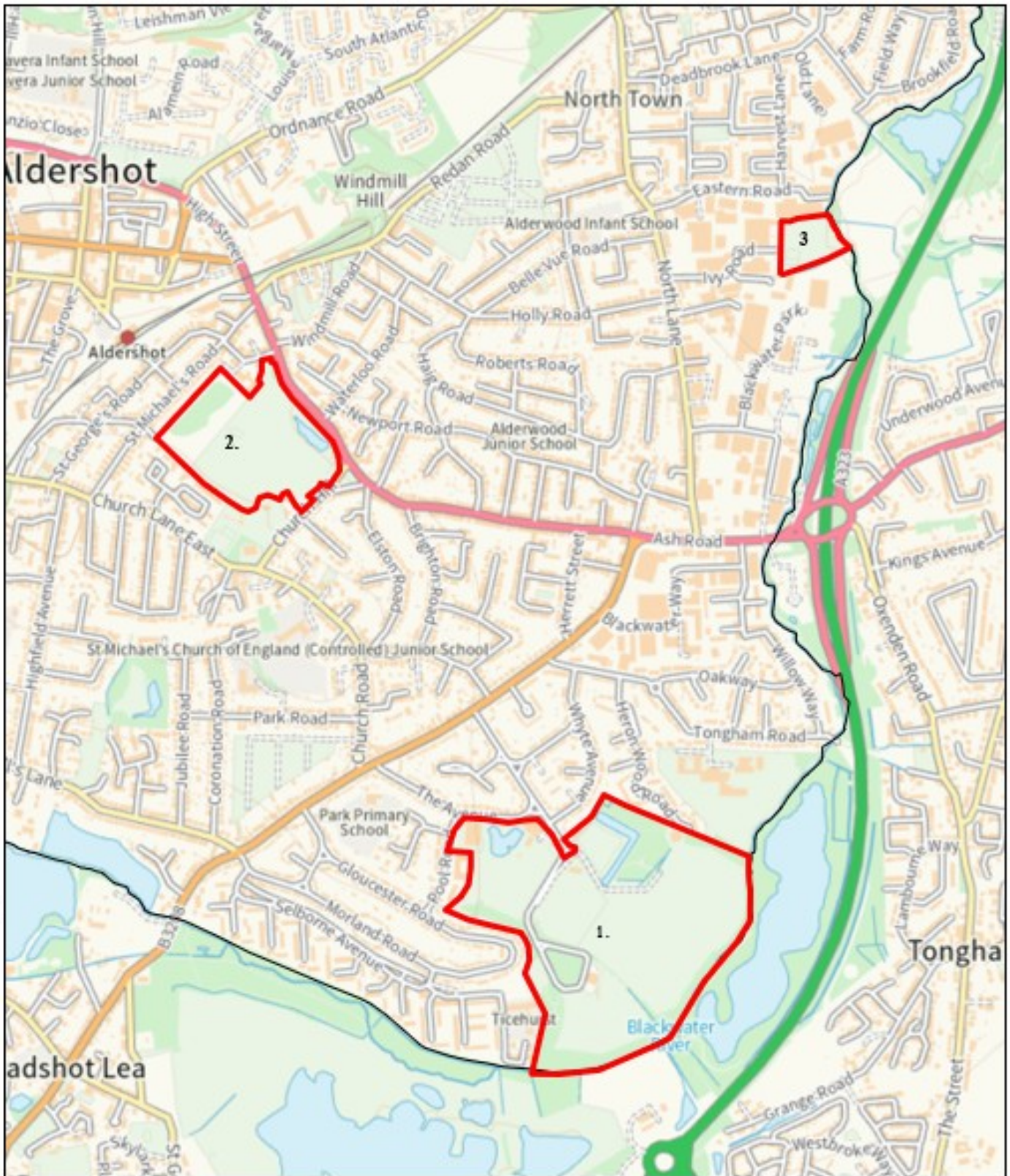
ArcGIS Web Map



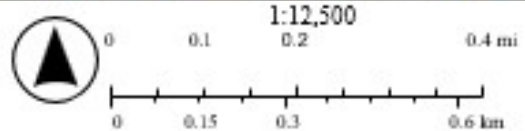
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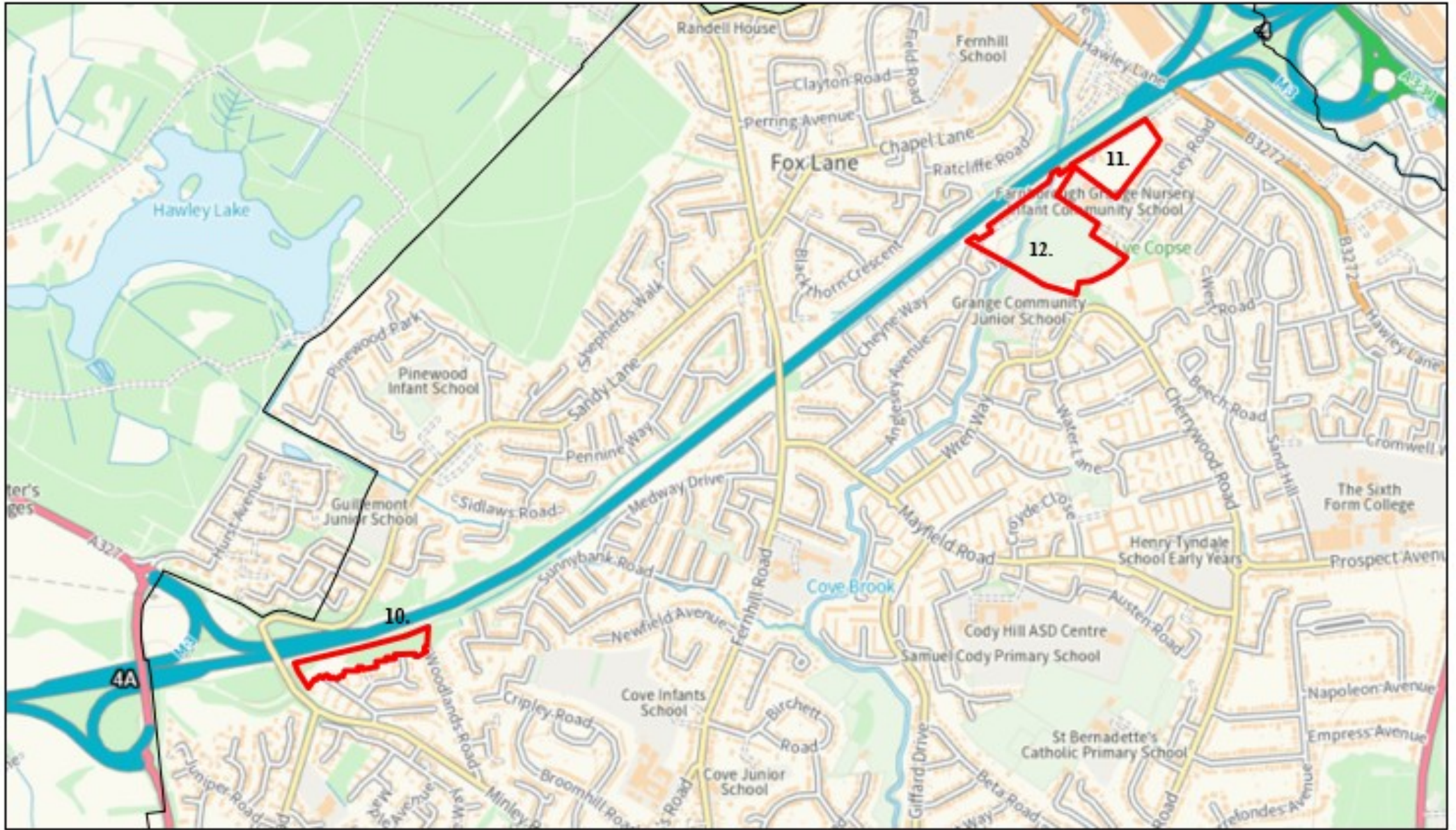
ArcGIS Web Map




6/23/2025, 10:14:15 AM

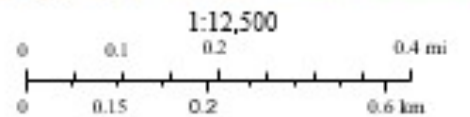


ArcGIS Web Map

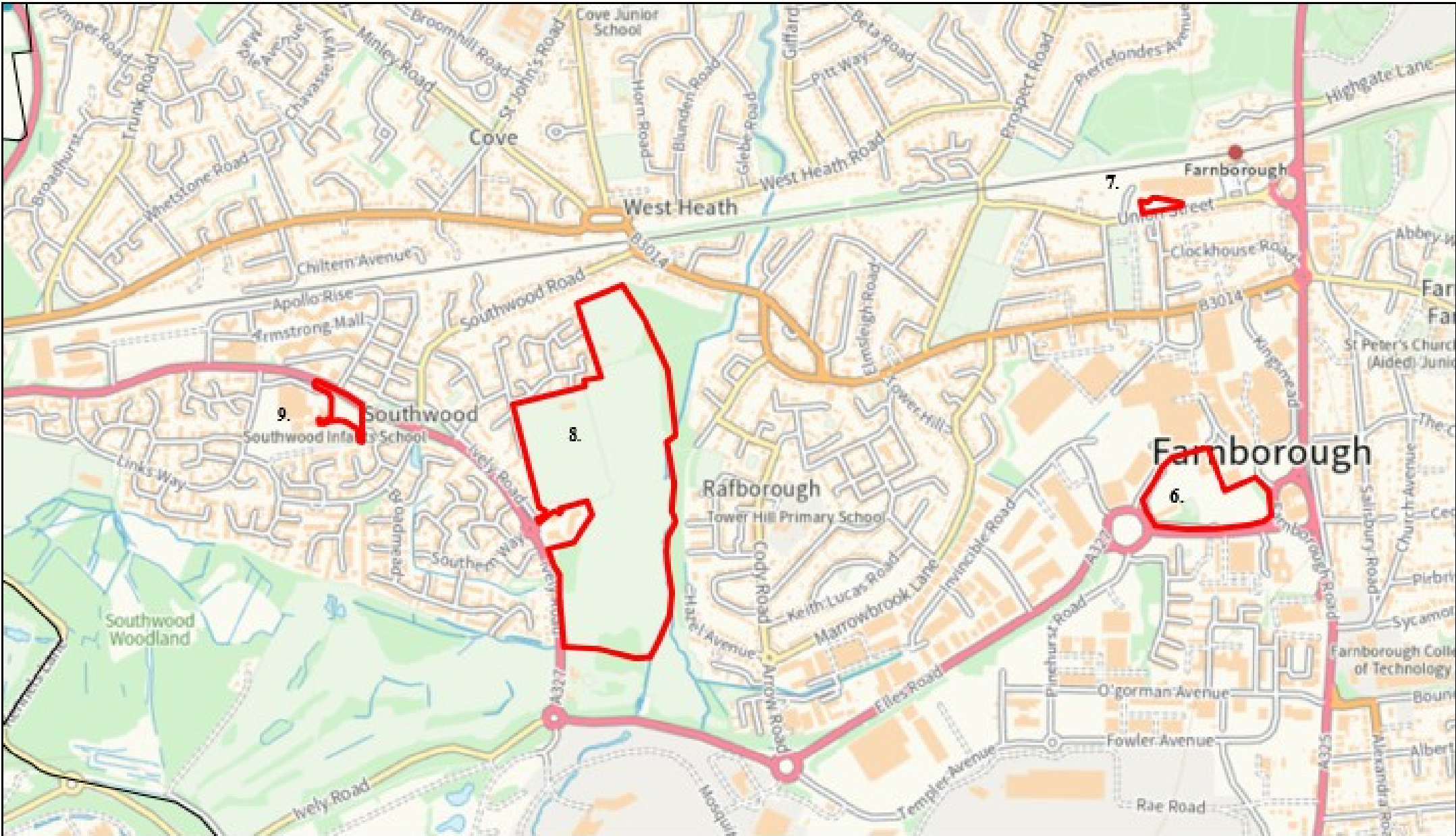


6/23/2025, 10:10:16 AM

 Rushmoor Boundary

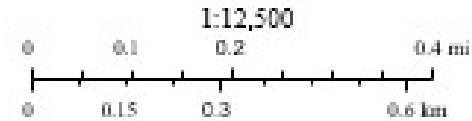


ArcGIS Web Map

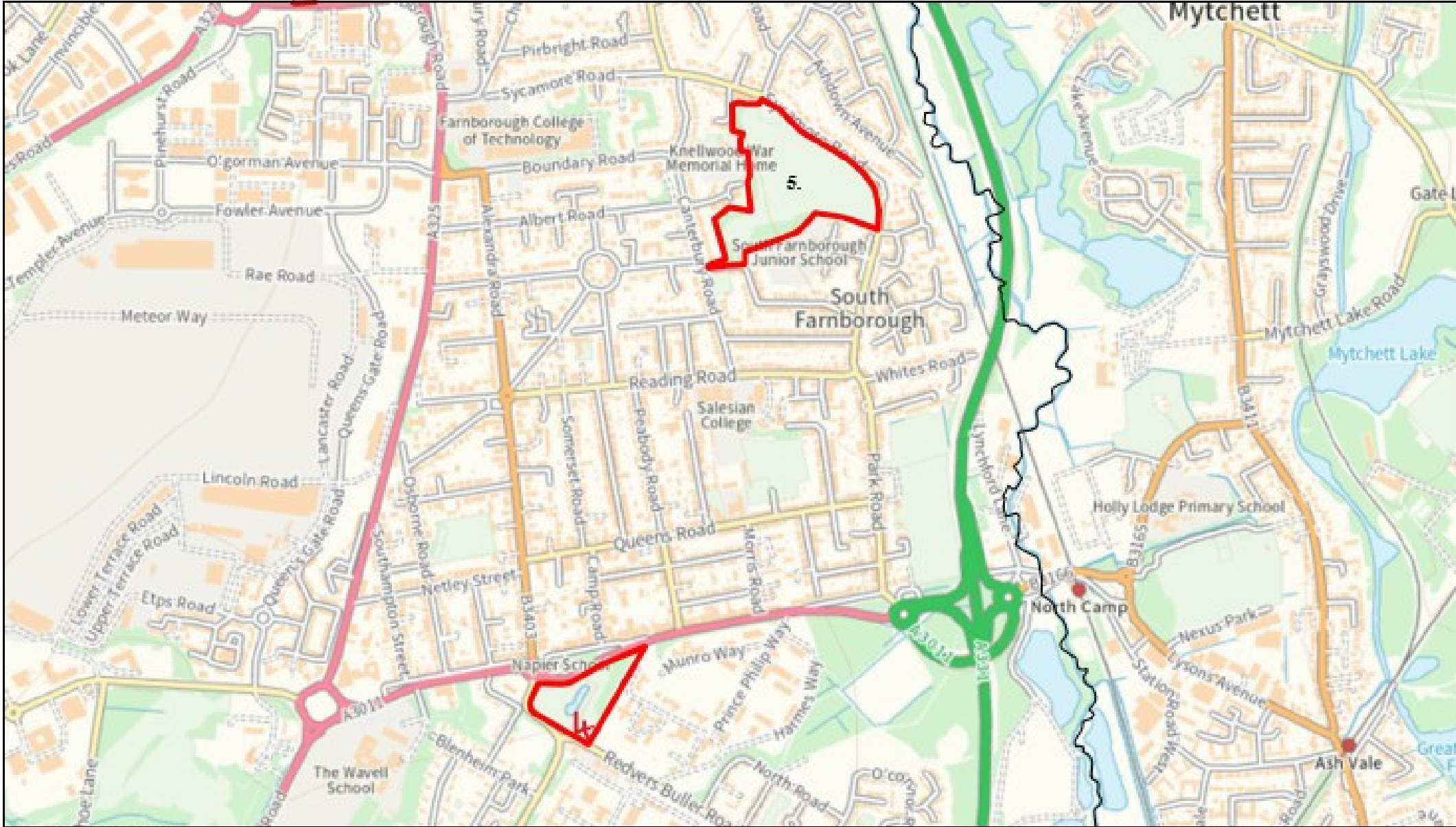


6/23/2025, 10:11:01 AM

 Rushmoor Boundary

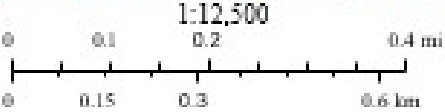


ArcGIS Web Map



6/23/2025, 10:11:27 AM

 Rushmoor Boundary



**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: KB-2025-002184

**BEFORE THE HONOURABLE MR JUSTICE CALVER
DATED 24 JUNE 2025**

B E T W E E N:

RUSHMOOR BOROUGH COUNCIL

Claimant

-and-

**PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR**

Defendant

SCHEDULE 2: WORDING FOR NOTICES

The wording for notices [On the package containing the Order] shall read:

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CONTACT FAO: LEGAL SERVICES AT RUSHMOOR BOROUGH COUNCIL, COUNCIL OFFICES, FARNBOROUGH ROAD, FARNBOROUGH, GU14 7JU

E: legal@rushmoor.gov.uk

T: 01252 398399

All documents relating to these proceedings and this Order may be downloaded at :
www.rushmoor.gov.uk/injunctionapplication”

Matt Edwards

Subject: RE: Grasmere traveller incursion

From: [REDACTED]
Sent: Monday, September 1, 2025 3:14:02 pm
To: Colin Alborough <colin.alborough@rushmoor.gov.uk>
Subject: Re: Grasmere traveller incursion

CAUTION: This email originated from outside of Rushmoor Borough Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

My name is [REDACTED] and I'm the Club Chairman for Rushmoor Community Football Club, an FA accredited club. We play our home matches at Grasmere Road, Farnborough GU14 0LE. The club is home to approximately 50 registered teams, including men's, ladies', boys', girls', seniors, and veteran teams, with around 600 members in total. Additionally, the club serves as a community hub for many local residents within Southwood and beyond.

On Monday, August 25th, 2025, at around 20:00, I was informed that travellers had broken into the ground by cutting two padlocks from two gates, causing damage to both. These actions were captured on CCTV. After verifying the situation on the CCTV, I contacted the police at around 20:10. The police confirmed that an incident had already been logged, and officers were present at the scene. I informed them about the existing injunction, which they acknowledged and promised to investigate further.

When I checked the ground, I estimated that there were about fifty vehicles and twenty caravans already present, with more attempting to enter. The police on site managed to prevent additional vehicles from entering and directed the current ones away from the site. I arrived at the scene around 21:00 and interacted with the officers. By this time, all but one caravan had been removed and directed towards the Northbound M3 motorway.

A local resident, [REDACTED], attempted to communicate with the travellers, urging them not to enter the site and damage our ground and pitches. [REDACTED] said, "This is a public field used for local sports and families; you shouldn't be cutting locks to gain access." The travellers replied aggressively, saying, "Go away, have you never seen a f**king caravan before." This exchange left [REDACTED] feeling threatened and intimidated, prompting him to walk away. The police then took full control of the situation.

Upon my arrival, I provided my details to the police, who instructed me to secure the site. I did so by placing new padlocks on the two damaged gates. Many local residents expressed their concerns for their safety and were grateful for the quick response and proactive actions taken. Despite the travellers' short stay on the field, they managed to drive heavy vehicles across the cricket square and several football pitches, causing damage.

Thanks to the swift enforcement of the injunction, we avoided potentially thousands of pounds worth of damage that could have hindered our ability to train or play matches. As a non-profit club, we have invested significant time and resources into this site, with support from the football foundation and local authorities. The actions of the travellers could have easily undone this work and disrupted community activities.

I observed that the travellers left the site looking upset and confused but showed little regard for the field or the impact of their vehicles. I firmly believe that without the injunction, the situation would have been much worse. I recommend additional deterrents, such as security out-of-ground Rhino bars, to further protect Grasmere Road. With these measures and the injunction in place, we can safeguard our investment and meet the community's needs.

Many thanks



RCFC Chairman

BETWEEN:-

RUSHMOOR BOROUGH COUNCIL

Claimant

-V-

PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED ENCAMPMENTS IN
THE BOROUGH OF RUSHMOOR

Defendants

WITNESS STATEMENT OF MATTHEW EDWARDS

I, MATTHEW EDWARDS, Litigation and Regulatory Solicitor at Rushmoor Borough Council of Farnborough Road, Farnborough, GU14 7JU, WILL SAY as follows:

1. I am employed by the Claimant as a Solicitor. I have day to day conduct of the management of this case on behalf of the Claimant. Except where I state otherwise, the facts in this statement are true to the best of my knowledge, information and belief. Where it appears that my knowledge has come from another source, then I believe that source and the facts gained from there to be true. I am aware of the duty for full and frank disclosure.
2. This statement is made in relation to the requirements of service of the original Injunction Order made by Mr Justice Calver on 24 June 2025. The order required that the Claimant:
 - “a. The Claimant shall serve this Order upon the Defendants by each of the following methods:
 - i. Personal service as described in paragraph 6b below.
 - ii. Advertising the existence of this Order in the Hampshire Independent and in particular, with a link to the Injunction Website, which will contain a direct link to this Order and the accompanying documents.
 - iii. The Claimant shall use reasonable endeavours to place advertisements on local notice boards managed by the Claimant which shall contain a direct link to this Order and the accompanying documents.

- iv. Publishing social media posts on the Claimant's Facebook and LinkedIn pages, providing a link to the Injunction Website which will contain a direct link to the Order and the accompanying documents.
- v. Affixing copies (as opposed to originals) of this Order in a transparent envelope, or laminated copy, in a prominent position on or close to all adopted highway entry points within the area marked with the red line on the map attached at Schedule 1 with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from Rushmoor Borough Council, Council Offices, Farnborough Rd, Farnborough GU14 7JU.
- vi. Advertising the existence of this Order in a prominent location on the Injunction Website, together with a link to download an electronic copy of this Order.

b. Service of this Order on Defendants in occupation on the Injunction Land may be effected by personal service where practicable and/or posting a copy of this Order through the letterbox. If there is no letterbox, then a package containing this Order may be affixed to or left at the front door or other prominent feature marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in prominent lettering in the form set out in Schedule 2 It is open to any Defendant to contact the Claimants to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed or left at the front door or other prominent feature."

- 3. Following the grant of the Injunction Order the Claimant prepared and published a website (<https://www.rushmoor.gov.uk/injunctionapplication>) which contained a copy of the bundle and evidence relied upon by the Claimant in seeking the injunction, details of where to contact officers about the injunction and a copy of the sealed Order of Mr Justice Calver. The Claimant also prepared a QR Code which linked users directly to the website.
- 4. In accordance with Paragraph i of the Order the Claimant's Officers personally delivered a copy of the Injunction Order to the occupiers of the affected land. A copy of the envelope and letter personally served by officers on 24th is exhibited as **ME1**. Prior to being able to personally serve copies to those forming the encampment at Aldershot Park they had moved on and were no longer in occupation of the land.
- 5. In accordance with Paragraph ii the Claimant arranged a notice to be published in next available copy of the Hampshire Independent. This was published on 4th July 2025, a copy of the advertisement is exhibited as **ME2**.
- 6. In accordance with Paragraph iii the Claimant prepared and printed posters to be displayed in its community notice boards throughout the borough. Copies of the posters have been displayed in the notice boards since the week following the injunction. A copy of the poster displaying information about the injunction is exhibited as **ME3**.
- 7. On 25 June 2025 Copies of the Injunction and a Notice were affixed in prominent locations by the Claimant's Officers at entrances of each of the 12 sites covered by the injunction. An example of the notice and copy of the order as displayed at an entrance to Aldershot Park is exhibited as **ME4**.

8. On 26 June 2025 the Council made Social Media posts through its Facebook and LinkedIn accounts. The posts provided information about the injunction and also a link to the Injunction Website for further information.
9. The Claimant believes it has made complied fully with the Order regarding service of the Injunction and has best efforts to publicise the injunction and make interested parties aware of where additional information regarding it can be sought.

I am authorised by the Claimant to make this statement.

I believe that the facts stated in this 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.

Dated the 02 day of September 2025

Signed:

A solid black rectangular box used to redact the signature of the solicitor.

**Matthew Edwards
Litigation and Regulatory Solicitor**

Our reference: Legal/004956

**The occupant of the vehicle on the land at
the King George V Playing Fields Car Park
Sycamore Road
Farnborough
Hampshire**

VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CONTACT FAO: LEGAL SERVICES AT RUSHMOOR BOROUGH COUNCIL, COUNCIL OFFICES, FARNBOROUGH ROAD, FARNBOROUGH, GU14 7JU

E: legal@rushmoor.gov.uk

T: 01252 398399

All documents relating to these proceedings and this Order may be downloaded at:
www.rushmoor.gov.uk/injunctionapplication.



Our reference: Legal/004956

Contact: Matt Edwards

**The occupant of the vehicle on the land at
the King George V Playing Fields Car Park
Sycamore Road
Farnborough
Hampshire**

Email: matthew.edwards@rushmoor.gov.uk

Date 24 June 2025

Dear Sir,

**Injunction – preventing unauthorised encampments on land within
Rushmoor within the land edged in red on the plans attached to the Order
Claim Number: KB-2025-002184**

Rushmoor Borough Council has obtained an injunction preventing use of specified land within the Borough of Rushmoor for residential purposes. King George V Playing Fields Car Park, Sycamore Road, Farnborough, Hampshire is included within the specified land.

The injunction takes effect at 10 am on 25 June 2025. If you disobey this Order, you may be held to be in contempt of court and may be arrested.

A copy of the Order, including the addresses and red line plans comprising the injunction land, is enclosed to this letter.

You are strongly advised to seek independent legal advice regarding the implications and enforcement of the injunction order issued by the High Court.

Yours sincerely,

Amanda Bancroft
Interim Monitoring Officer &
Corporate Manager Legal Services

Encl. Injunction Order

**RUSHMOOR BOROUGH COUNCIL
SECTION 187B, TOWN AND COUNTRY PLANNING ACT
1990**

**NOTICE OF INJUNCTION AGAINST PERSONS UNKNOWN
FORMING UNAUTHORISED ENCAMPMENTS IN THE
BOROUGH OF RUSHMOOR**

The areas on land detailed below.

NOTICE IS HEREBY GIVEN that Rushmoor Borough Council has obtained an Injunction pursuant to section 187B of the Town and Country Planning Act 1990 to prevent Persons Unknown forming unauthorised encampments in the Borough of Rushmoor.

INJUNCTION LAND

The Injunction relates to the areas of land known as:

- Land at Aldershot Park, Guildford Road, Aldershot (including Aldershot Park, Aldershot Pools Complex and Lido, Aldershot Crematorium, Aldershot Cricket Club)
- Manor Park, Church Hill, Aldershot
- Ivy Road Recreation Ground, Ivy Road, Aldershot
- Napier Gardens and Car Park, Redvers Buller Road, North Camp
- King George V Playing Fields, Sycamore Road, Farnborough
- Farnborough Leisure Centre car park, Westmead, Farnborough
- Union Street West car park, Union Street, Farnborough
- Southwood County Park, Playing Fields, Car parks, Ively Road, Farnborough
- Southwood Village Green, Summit Avenue, Farnborough
- Nightingale Close, Farnborough (Land to the east of Minley Road)
- Land at Hawley Lane, Farnborough
- Moor Road Playing Field, Moor Road, Farnborough

These areas are shown on the plans attached to the Injunction which can be accessed above

THE ORDER AND CLAIM

A copy of the Injunction Order and maps, along with the Claim and associated documents can be obtained by the following link:
<https://www.rushmoor.gov.uk/injunctionapplication>

Or viewed by attending the Reception at the Council Offices Farnborough Road, Farnborough GU14 7JU between the hours 9:00 am to 2.00 pm Mondays – Fridays only.

Amanda Bancroft

Corporate Manager - Legal Services

Rushmoor Borough Council

Council Offices

Farnborough Road

Farnborough

GU14 7JU

NOTICE

There is an injunction preventing unauthorised encampments on land within Rushmoor within the land edged in red on the plan to the Order of Mr Justice Calver dated 24 June 2025 - Claim Number: KB-2025-002184

The Order will remain in force until 23 September 2025 (or such other date as may be ordered).

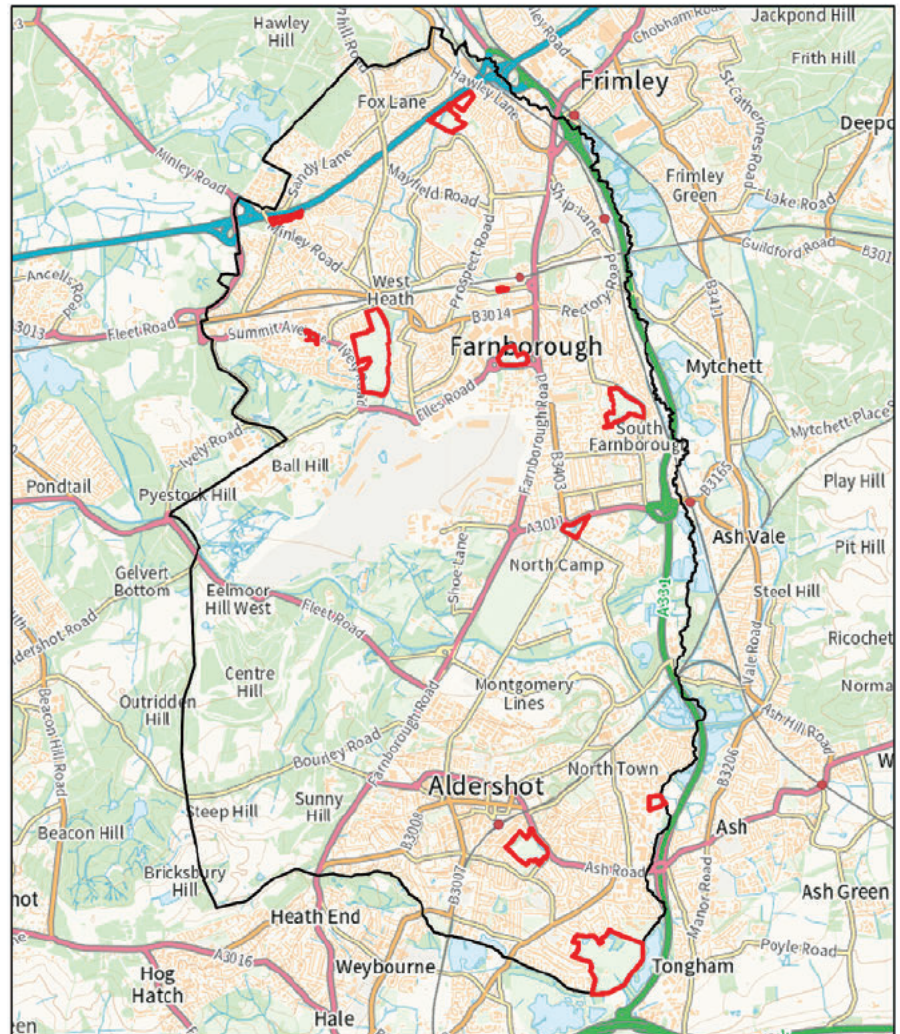
A detailed copy of the injunction and maps, along with the claim and associated documents, can be obtained by:

1. Going to:
www.rushmoor.gov.uk/injunctionapplication;

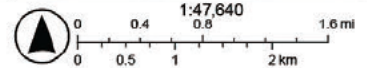
2. Scanning the QR code;



3. Or, by visiting the Council Offices, Farnborough Road, Farnborough, Hampshire, GU14 7JU, during normal office hours (9am to 2pm Monday to Friday).



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Amanda Bancroft
Legal Services

FOR THE ATTENTION OF PERSONS UNKNOWN

Date: 24 June 2025

NOTICE

Our reference: Legal/004963

Dear Sir/Madam

Injunction – preventing unauthorised encampments on land within Rushmoor within the land edged in red on the plans attached to the Order
Claim Number: KB-2025-002164

Please find attached, by way of service upon you, Part 8 Application and Injunction Order in respect of the above claim.

The witness statements and evidence submitted in support of the Injunction can be found:

1. By scanning the QR code at the bottom of this notice;
2. On the Council's website using the following link: www.rushmoor.gov.uk/injunctionapplication; or
3. At the Council's Offices, Farnborough Road, Farnborough, Hampshire, GU14 7JU during normal office hours (9.00am to 2pm Monday to Friday).

You are advised to consult a solicitor as soon as possible should you have any concerns or questions regarding the enclosed.

Yours faithfully

Amanda Bancroft
Interim Corporate Manager – Legal Services
Rushmoor Borough Council



Jan Harrison - Managing Director Karen Edwards - Executive Director
www.rushmoor.gov.uk

It is an offence not to clean up IMMEDIATELY after your dog
OFFENDER

IN THE HIGH COURT OF JUSTICE
BETWEEN
RUSHMOOR BOROUGH COUNCIL
and
PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR
ORDER FOR AN INJUNCTION
Claim No. KB-2025-002164
LEGAL SERVICES
FARNBOROUGH ROAD, FARNBOROUGH, HAMPSHIRE, GU14 7JU
T: 01252 383300
E: legal@rushmoor.gov.uk
All documents relating to these proceedings and this Order may be downloaded at:
www.rushmoor.gov.uk/injunctionapplication



FOR THE ATTENTION OF PERSONS UNKNOWN

Date: 24 June 2025

NOTICE

Our reference: Legal/004963

Dear Sir/Madam

**Injunction – preventing unauthorised encampments on land within
Rushmoor within the land edged in red on the plans attached to the Order
Claim Number: KB-2025-002184**

Please find attached, by way of service upon you, Part 8 Application and Injunction Order in respect of the above claim.

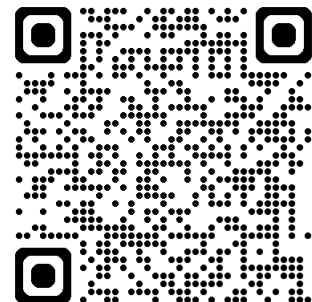
The witness statements and evidence submitted in support of the Injunction can be found:

1. By scanning the QR code at the bottom of this notice;
2. On the Council's website using the following link:
www.rushmoor.gov.uk/injunctionapplication; or
3. At the Council's Offices, Farnborough Road, Farnborough, Hampshire, GU14 7JU during normal office hours (9.00am to 2pm Monday to Friday).

You are advised to consult a solicitor as soon as possible should you have any concerns or questions regarding the enclosed.

Yours faithfully

Amanda Bancroft
Interim Corporate Manager – Legal Services
Rushmoor Borough Council



IN THE HIGH COURT OF JUSTICE

Claim No. KB-2025-002184

B E T W E E N:

RUSHMOOR BOROUGH COUNCIL

Claimant

-and-

PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR

Defendant

ORDER FOR AN INJUNCTION

**VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND
YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE.**

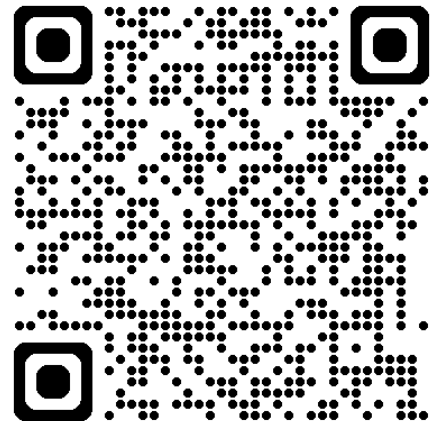
IF YOU NEED ANOTHER COPY PLEASE CONTACT FAO:

LEGAL SERVICES AT RUSHMOOR BOROUGH COUNCIL, COUNCIL OFFICES,
FARNBOROUGH ROAD, FARNBOROUGH, GU14 7JU

E: legal@rushmoor.gov.uk

T: 01252 398399

All documents relating to these proceedings and this Order may be downloaded at:
www.rushmoor.gov.uk/injunctionapplication



C. Draft Order

BEFORE [X]

ON 19 SEPTEMBER 2025

B E T W E E N:

PENAL NOTICE IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

RUSHMOOR BOROUGH COUNCIL

Claimant

-and-

**PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR**

Defendant

***DRAFT* INJUNCTION**

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

BEFORE [X] sitting at [X] on [date]

AND UON HEARING Counsel for the Claimant, Ms Sioned Davies

AND UPON the Claimant's application by Application Notice dated 02 September 2025

AND UPON the Claimant's confirmation that this Order is not intended to prohibit lawful use of the application land.

IT IS ORDERED THAT:

A. INJUNCTION ORDER

1. After 00:00 on 24 September 2025 and until 23 September 2026 unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:
 - a. Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans or mobile homes and the storage of vehicles, caravans and residential paraphernalia, except where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
 - b. Setting-up an encampment on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, except where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).
 - c. Setting-up an encampment on any part of the Land (as defined below) without Written Permission from the Local Planning Authority (as defined below), or planning permission granted by the Secretary of State or in accordance with statutory permitted development rights.
 - d. Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans or mobile homes other than when driving through the highways on the Land or in compliance with parking orders regulating the use of car parks or with the express permission from the owner of the Land, except where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
 - e. Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.
2. There shall be a power of arrest attached to paragraphs 1(a) to (e) (inclusive) of this Order
3. The 'Land' in this Order means all land within the Borough of Rushmoor marked within the redline on the attached map in Schedule 1 of the Order
4. The 'Injunction Website' means a website hosted at: www.rushmoor.gov.uk/injunctionapplication. The Injunction Website shall have a QR Code link.

B. SERVICE

5. Pursuant to CPR r6.27 and r.8.14:
 - a. The Claimant shall serve this Order upon the Defendants by each of the following methods:
 - i. Personal service as described in paragraph 5b below.
 - ii. Advertising the existence of this Order in the Hampshire Independent and in particular, with a link to the Injunction Website, which will contain a direct link to this Order and the accompanying documents.

- iii. The Claimant shall use reasonable endeavours to place advertisements on local notice boards managed by the Claimant which shall contain a direct link to this Order and the accompanying documents.
- iv. Publishing social media posts on the Claimant's Facebook and LinkedIn pages, providing a link to the Injunction Website which will contain a direct link to the Order and the accompanying documents.
- v. Affixing copies (as opposed to originals) of this Order in a transparent envelope, or laminated copy, in a prominent position on or close to all adopted highway entry points within the area marked with the red line on the map attached at Schedule 1 with a notice to Persons Unknown that a copy of the supporting evidence can be obtained from Rushmoor Borough Council, Council Offices, Farnborough Rd, Farnborough GU14 7JU.
- vi. Advertising the existence of this Order in a prominent location on the Injunction Website, together with a link to download an electronic copy of this Order.

b. Service of this Order on Defendants in occupation on the Injunction Land may be effected by personal service where practicable and/or posting a copy of this Order through the letterbox. If there is no letterbox, then a package containing this Order may be affixed to or left at the front door or other prominent feature marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in prominent lettering in the form set out in Schedule 2 It is open to any Defendant to contact the Claimants to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed or left at the front door or other prominent feature.

6. Service of this Order shall be:
 - a. Verified by certificates of service to be filed with the Court; and
 - b. Be good and sufficient service of this Order on the Defendants and each of them.

C. LIBERTY TO APPLY

7. The Defendants or anyone notified of this Order may each of them apply to the Court on 48 hours prior written notice (without prejudice to the right of that person to apply to shorten the time for service) to both the Court and the Claimants to vary or discharge this Order (or so much of it as affects that person). The contact details for both the Court and the Claimant can be found in paragraph 20-21 below.

D. RENEWAL OF THIS ORDER

8. This Order against the Defendants will expire by effluxion of time at 00:00 hrs on 24th September 2025. The Claimants may, if so advised, apply for the renewal of the Order against the Defendants ("the Renewal Application"). Any Renewal Application and evidence in support must be filed and served in accordance with paragraph 4 above by 4pm on **31st August 2026**.
9. A hearing shall be listed on [**date before 24th September 2026**], with a time estimate of one day, at which the Renewal Application shall be considered. If the Claimants do not make a Renewal Application, they must notify the Court as soon as reasonably practicable and seek to vacate the hearing.

10. Any person other than the Claimant who would like to participate in the hearing of the Renewal Application must also file on the Claimant any evidence upon which they seek to rely at the hearing of the Renewal Application by 4pm on **11th September 2026**.

E. COSTS

11. No order as to costs against the Defendants.

GUIDANCE NOTES

EFFECT OF THIS ORDER

12. A Defendant who is an individual who is ordered not to do something must not do it himself or herself or in any other way. He or she must not do it through others acting on his or her behalf or on his or her instructions or with his or her encouragement.
13. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

14. It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

INTERPRETATION OF THIS ORDER

15. In this Order, where there is more than one Defendant, unless otherwise stated, references to “the Defendants” means each or all of them.
16. A requirement to serve on “the Defendants” means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.
17. An Order requiring the Defendants to do or not to do anything applies to all Defendants.
18. ‘**Controlled waste**’ has the same meaning as within s.75(4) of the Environmental Protection Act 1990.
19. ‘**Written Permission from the Local Planning Authority**’ includes, but is not limited to, written permission granted pursuant to any negotiated stopping agreement, policy or procedure.

COMMUNICATIONS WITH THE COURT

20. All communication to the Court about this Order should be sent to kbjudgeslistingoffice@justice.gov.uk, The Royal Courts of Justice, Strand, London WC2A 2LL. The telephone number is 020 3938957. 21.
21. All communications to the Claimants about this Order should be sent to legal@rushmoor.gov.uk

Power of arrest

Name of defendant

Persons Unknown

Defendant's address

N/A

Name of court High Court of Justice	Claim No. KC02025-002184
Claimant's name (including ref.) Rushmoor Borough Council (Ref. ME/4957)	
Defendant's name (including ref.) Persons Unknown	



Date order made | 1 9 / 9 | / 2 0 2 5 | Name of judge |

Order made under (insert statutory provision) | s222 of the Local Government Act 1972 and s187B of the Town and Country Planning Act 1990

This order includes a power of arrest under (insert statutory provision)
s27 of the Police and Justice Act 2006

The relevant paragraphs of the order to which a power of arrest has been attached are:
(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

Paragraphs 1(a) to 1(e) of the Order of XXX dated XXX (see continuation sheet)

This power of arrest was ordered on 2 3 / 6 | / 2 0 2 5 **and expires on the** 2 3 / 9 | / 2 0 2 5

Note to Arresting Officer

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant
Rushmoor Borough Council

Claimant's address
Council Offices, Farnborough Road, Farnborough, GU14 7JU

Claimant's phone number
01252 398 399

BEFORE

ON

B E T W E E N:

RUSHMOOR BOROUGH COUNCIL

Claimant

-and-

PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR

Defendant

POWER OF ARREST

This power of arrest applies to the Defendant (Persons Unknown who are forming unauthorised encampments in the Borough of Rushmoor).

The relevant paragraphs of the order to which the power of arrest has been attached are paragraphs 1(a)-(e) (inclusive) of the Order of [x] dated [x]:

Until and including 24th September 2026, the Defendants are **forbidden** from:

- a. Entering and/or occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
- b. Setting-up an encampment on any part of the Land (as defined below) unless authorised to do so by the owner of the Land and provided the encampment does not breach planning control, save for where the encampment is authorised by Written Permission from the Local Planning Authority (as defined below).
- c. Setting-up an encampment on any part of the Land (as defined below) without Written Permission from the Local Planning Authority (as defined below), or planning permission granted by the Secretary of State or in accordance with statutory permitted development rights.

- d. Bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans/mobile homes other than when driving through the highways on the Land or in compliance with the parking orders regulating the use of car parks or with the express permission from the owner of the Land, save for where the Land is occupied in accordance with a lawful planning permission from the Local Planning Authority, or the Secretary of State, or Written Permission from the Local Planning Authority (as defined below) or in accordance with statutory permitted development rights.
- e. Depositing or causing to be deposited, Controlled Waste (as defined below) in or on any part of the Land (as defined below) unless a waste management licence or environmental permit is in force and the deposit is in accordance with the licence or permit.

2. There shall be a power of arrest attached to paragraphs 1(a) to 1(e) (inclusive) of this Order.

3. The 'Land' in this Order means all land within the Borough of Rushmoor marked within the red line on the attached map in Schedule 1 to this Order.

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: KB 2025-002184

BEFORE

ON

B E T W E E N:

RUSHMOOR BOROUGH COUNCIL

Claimant

-and-

**PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR**

Defendant

SCHEDULE 1: RED LINE PLAN

BETWEEN:-

RUSHMOOR BOROUGH COUNCIL

Claimant

-V-

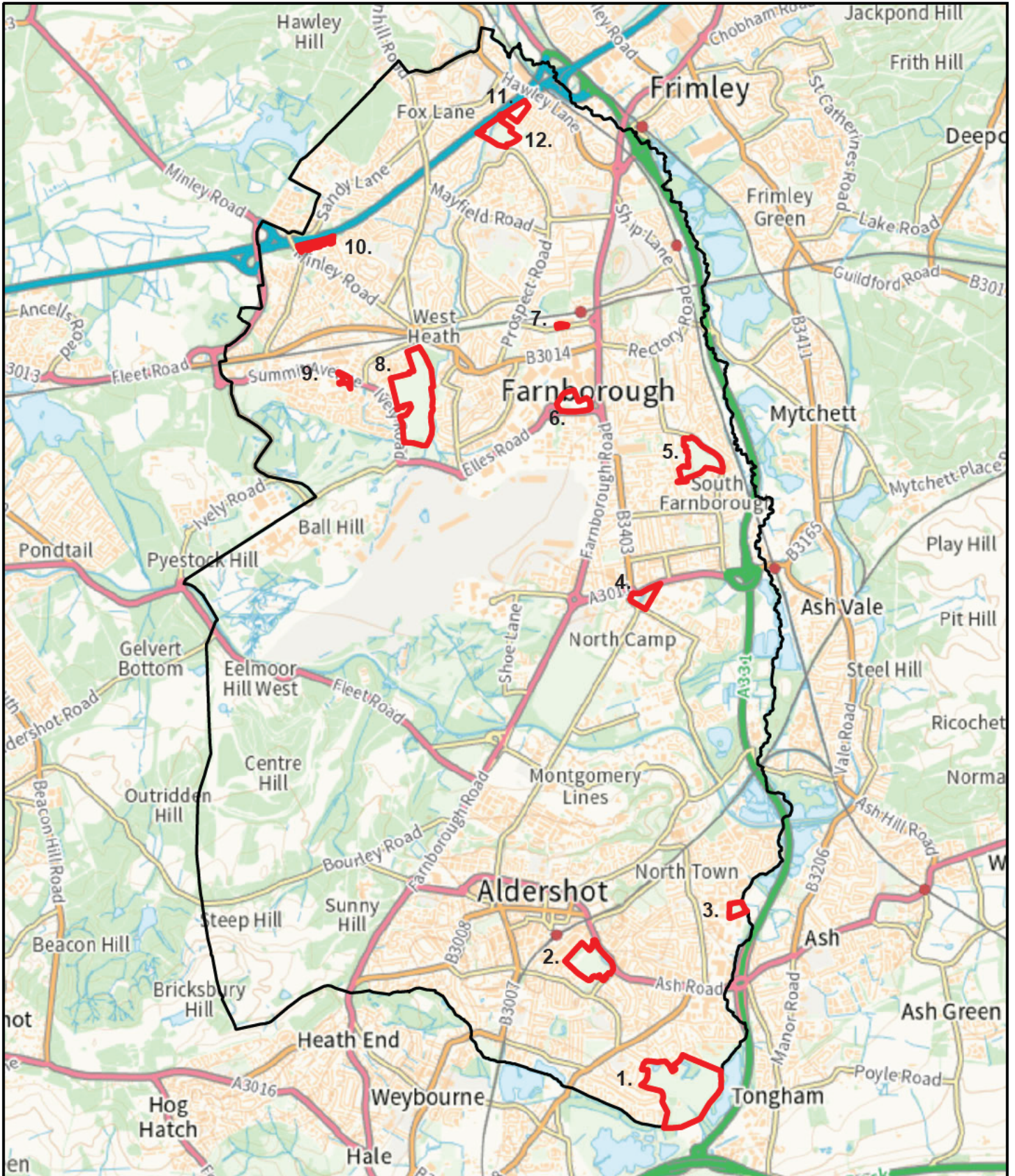
PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED ENCAMPMENTS IN
THE BOROUGH OF RUSHMOOR

Defendants

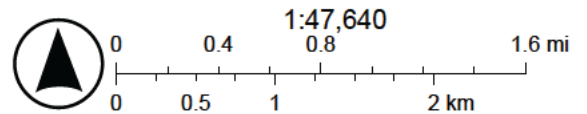
Annex 1 – List of Areas and Redline Plans

	Site Address
1	Land at Aldershot Park, Guildford Road, Aldershot (including Aldershot Park, Aldershot Pools Complex & Lido, Aldershot Crematorium, Aldershot Cricket Club)
2	Manor Park, Church Hill, Aldershot
3	Ivy Road Recreation Ground, Ivy Road, Aldershot
4	Napier Gardens and Car Park, Redvers Buller Road, Aldershot
5	King George V Playing Field, Sycamore Road, Farnborough
6	Farnborough Leisure Centre car park, Westmead, Farnborough
7	Union Street West car park, Union Street, Farnborough
8	Southwood County Park, Playing Fields, Car parks, Ively Road, Farnborough
9	Southwood Village Green, Summit Avenue, Farnborough
10	Nightingale Close, Farnborough (Land to the east of Minley Road)
11	Land at Hawley Lane, Farnborough
12	Moor Road Playing Field, Moor Road, Farnborough

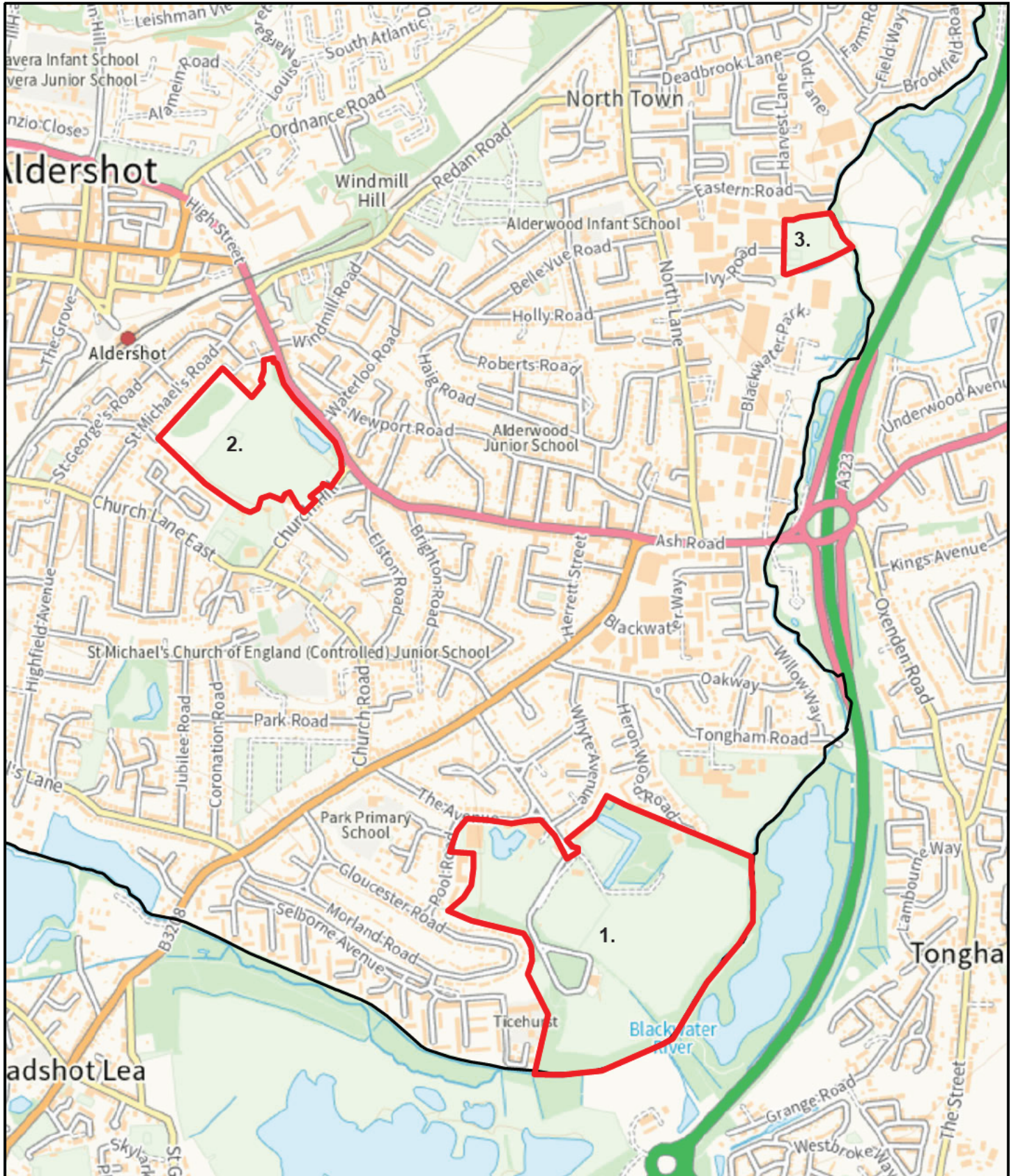
ArcGIS Web Map



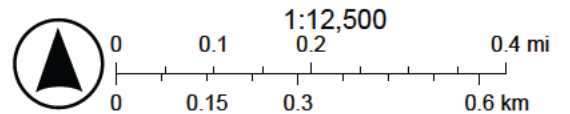
6/23/2025, 10:15:38 AM



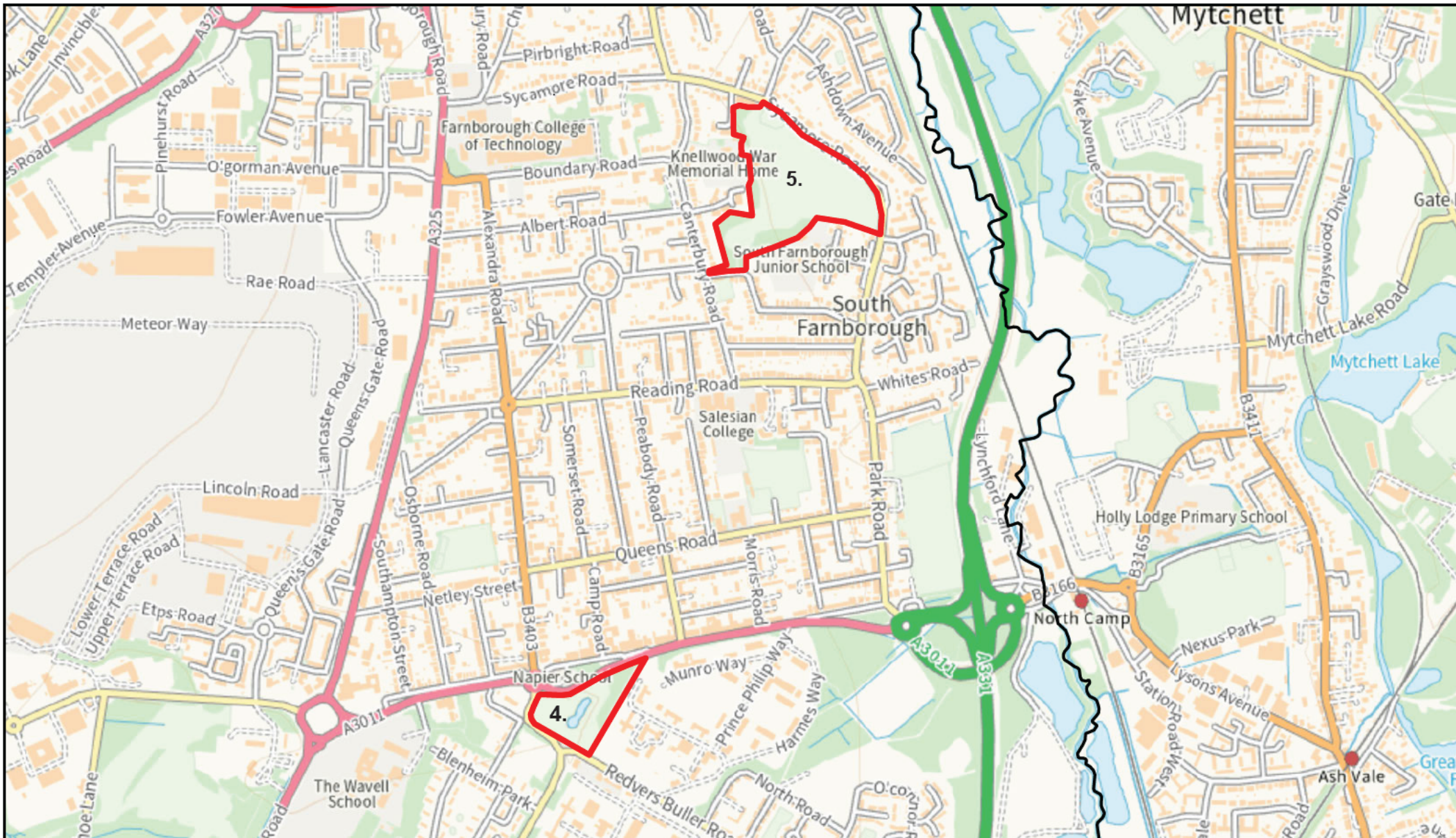
ArcGIS Web Map




6/23/2025, 10:14:15 AM

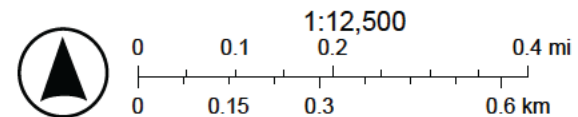


ArcGIS Web Map

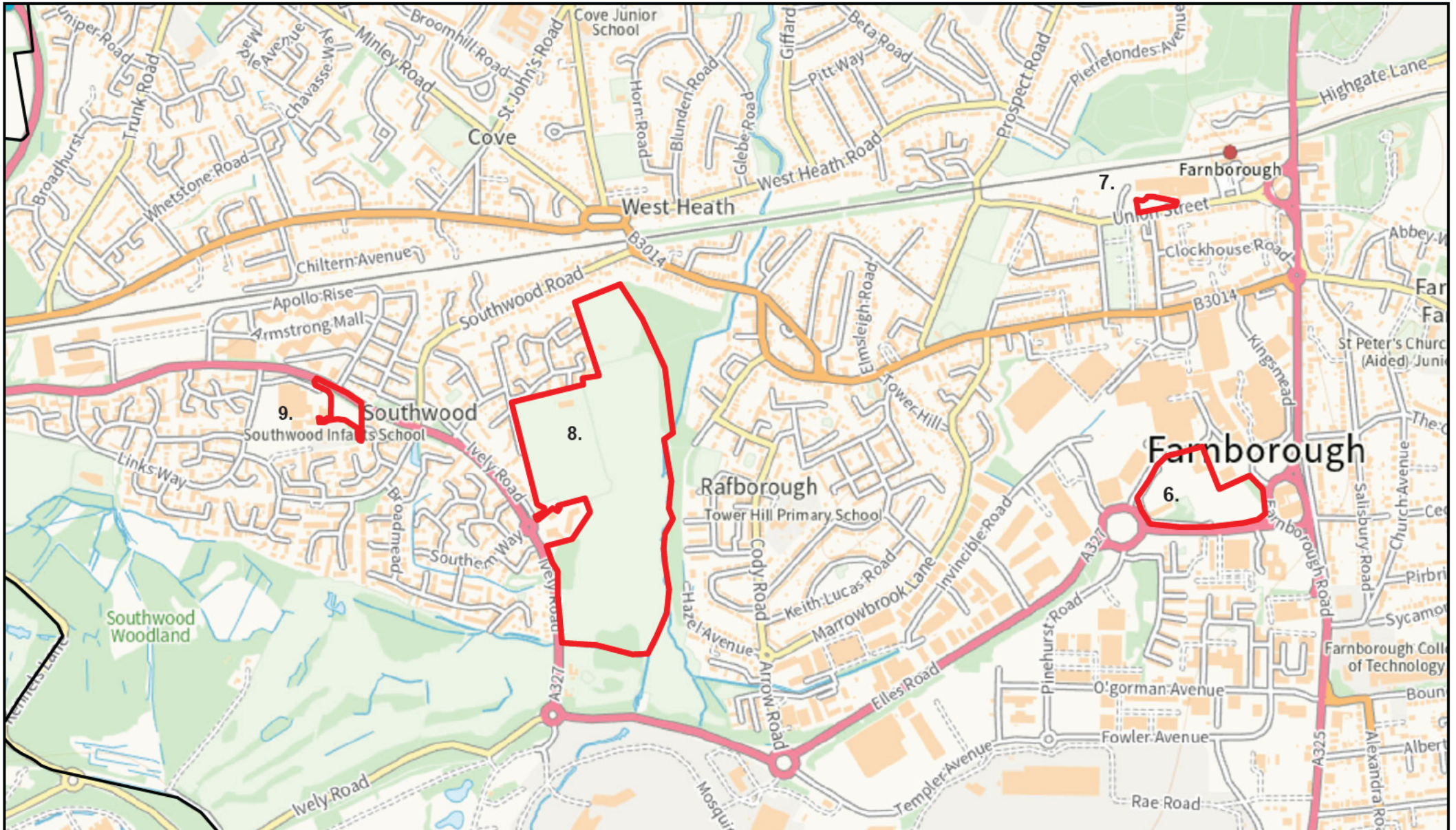


6/23/2025, 10:11:27 AM


 Rushmoor Boundary

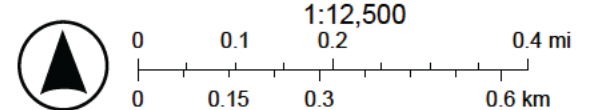


ArcGIS Web Map

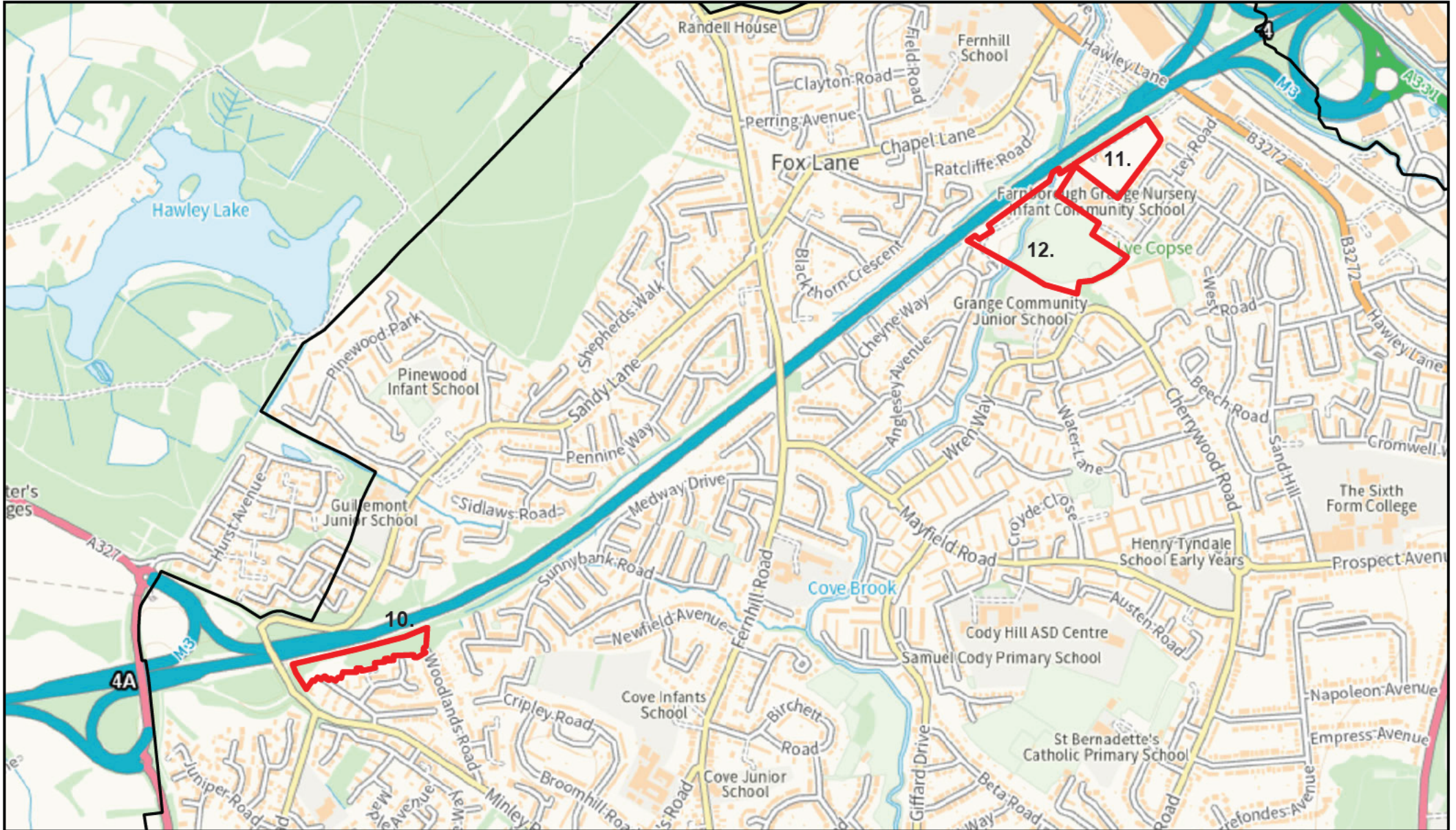


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 Rushmoor Boundary

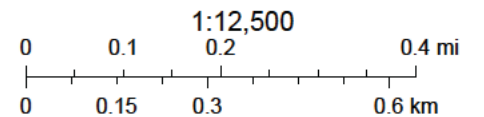


ArcGIS Web Map



6/23/2025, 10:10:16 AM

 Rushmoor Boundary



BEFORE

ON

B E T W E E N:

RUSHMOOR BOROUGH COUNCIL

Claimant

-and-

PERSONS UNKNOWN WHO ARE FORMING UNAUTHORISED
ENCAMPMENTS IN THE BOROUGH OF RUSHMOOR

Defendant

SCHEDULE 2: WORDING FOR NOTICES

The wording for notices [On the package containing the Order] shall read:

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CONTACT FAO: LEGAL SERVICES AT RUSHMOOR BOROUGH COUNCIL, COUNCIL OFFICES, FARNBOROUGH ROAD, FARNBOROUGH, GU14 7JU

E: legal@rushmoor.gov.uk

T: 01252 398399

All documents relating to these proceedings and this Order may be downloaded at :
www.rushmoor.gov.uk/injunctionapplication”