

Application for Injunction (General Form)

Name of court County Court at Bristol	Claim No. 1800BS959
Claimant's Name and Ref. Bristol City Council (12487400)	
Defendant's Name and Ref. Persons Unknown on Durdham Down, Clifton Down and Ladies Mile residing in tents, caravans or other vehicles adapted for residential purposes	
Fee Account no. PBA0083472	

AMENDED APPLICATION FOR INJUNCTION
UNDER CPR RULE 17.1(1)

RE-AMENDED APPLICATION FOR
INJUNCTION BY ORDER OF
DISTRICT JUDGE NAPIER
DATED 05.02.2026

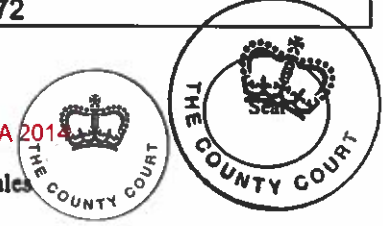


Notes on completion

Tick which boxes apply and specify the legislation where appropriate

- (1) Enter the full name of the person making the application
- (2) Enter the full name of the person the injunction is to be directed to
- (3) Set out any proposed orders requiring acts to be done. Delete if no mandatory order is sought.
- (4) Set out here the proposed terms of the injunction order (if the defendant is a limited company delete the wording in brackets and insert 'whether by its servants, agents, officers or otherwise').
- (5) Set out here any further terms asked for including provision for costs
- (6) Enter the names of all persons who have sworn affidavits or signed statements in support of this application
- (7) Enter the names and addresses of all persons upon whom it is intended

- By application in pending proceedings
- Under Statutory provision Highways Act 1980 and ASBCPA 2014
- This application is made under Part 8 of the Civil Procedure Rules



This application raises issues under the Human Rights Act 1998 Yes No

The Claimant ⁽¹⁾ Bristol City Council applies to the court for an injunction order in the following terms:

The Defendant ⁽²⁾ Persons Unknown on Durdham Down, Clifton Down and Ladies Mile residing in tents, caravans or other vehicles adapted for residential purposes structures

The Defendant be forbidden (whether by herself or by instructing or encouraging or permitting any other person) from ⁽³⁾

- i. Entering or residing on Durdham Down, Clifton Down and Ladies Mile with the intention of residing in tents, caravans or other vehicles adapted for residential purposes within the area shown in Map 1 being hatched red and green.
- ii. Defecating and/or urinating in any place other than the public toilets on the land hatched red and green on Map 1.
- iii. Depositing household or any other waste material on any part of the land hatched red and green on Map 1

Any person affected by this Order may apply to discharge or vary it by Application to the County Court at Bristol, 2 Redcliff Street, Bristol with a copy to legal.support@bristol.gov.uk at the same time as such Application is made. Such Application can be made by Application Notice or letter setting out details of the Application made and supported by a Statement of Truth on not less than 24 hours notice to the Claimant.

See below

The Defendant must ⁽⁴⁾

And that ⁽⁵⁾

The grounds of this application are set out in the written evidence of ⁽⁶⁾ Caroline Ennion dated 26.06.2025

The court office at

is open between 10am and 4pm Mon - Fri. When corresponding with the court, please address all forms and letters to the Court Manager and quote the claim number. N16A General form of application for injunction (05.14)

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This written evidence is served with this application.

This application is to be served upon ⁽⁷⁾ The Defendant - Persons Unknown on Durdham Down, Clifton Down and Ladies Mile residing in tents, caravans or other vehicles adapted for residential purposes

(8) Enter the full name and address for service and delete as required

This application is filed by ⁽⁸⁾ Bristol City Council Legal Services

the Claimant whose address for service is Bristol City Council Legal Services, City Hall, College Green, PO Box 3399, Bristol, BS1 9NE

The respondent is entitled to a reasonable opportunity to obtain legal representation and to apply for legal aid which may be available without any means test.

Signed A. Stephens Dated 26.06.2025

To*
of

This section to be completed by the court

Name and address of the person application is directed to

This application will be heard by the (District) Judge
at BRISTOL CIVIL JUSTICE CENTRE, REDCLIFF ST BRISTOL BS1 5TA
on Tuesday the 23rd day of July 2025 at 10.00 o'clock
Wednesday

If you do not attend at the time shown the court may make an injunction order in your absence
If you do not fully understand this application you should go to a Solicitor, Legal Advice Centre or a Citizens' Advice Bureau



A Power of Arrest is attached to the terms of this Injunction Order pursuant to section 4 of Anti-social Behaviour Crime & Policing Act 2014, whereby any constable may arrest the Defendant without warrant if they have reasonable cause for suspecting a breach of these clauses.





Claim Form (CPR Part 8)

In the County Court at Bristol	
Claim no.	
Fee Account no.	PBA0083472
Help with Fees - Ref no. (if applicable)	H W F - - - -

**AMENDED CLAIM FORM
UNDER CPR RULE 17.1(1)**



Claimant
Bristol City Council
City Hall
College Green
PO Box 3399
Bristol
BS1 9NE

**RE-AMENDED CLAIM FORM
BY ORDER OF
DISTRICT JUDGE NAPIER
DATED 05.02.2026**



Defendant(s)

Persons Unknown on Durdham Down, Clifton Down and Ladies Mile residing in tents, structures caravans or other vehicles adapted for residential purposes



Does your claim include any issues under the Human Rights Act 1998? Yes No

Details of claim (see also overleaf)

and the Anti Social Behaviour Crime and Policing Act 2014

The Claimant is seeking an Injunction Order under the Highways Act 1980. This is to prevent any further trespass on the Claimant's land at Durdham Down and Ladies Mile, and Clifton Down owned by the Merchant Venturers Society.

Durdham Down, Clifton Down and Ladies Mile are trespassed upon and occupied by tents and vehicle dwellers at different times of the year, usually from April - October, every year. Vehicle dwellers occupy different areas of The Downs, which creates extensive costs for the Claimant in moving the Defendants on and tidying the area from rubbish and excrement. The trespass also has a significant impact on the land and the community, as they are prevented from using the land for its intended purpose.



The land has been trespassed upon on several occasions this year by different encampments, and is currently being occupied by new Defendants. An Injunction is sought to protect the Durdham Down, Clifton Down and Ladies Mile from newcomers, whose intention is to reside in tents, caravans or other vehicles adapted for residential purposes.

Defendant's name and address

Persons Unknown on Durdham Down, Clifton Down, Ladies Mile residing in tents, caravans or other vehicles adapted for residential purposes Clifton, Bristol

	£
Court fee	377
Legal representative's costs	69.50
Issue date	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

Details of claim (continued)

The Claimant submits that the Defendants have trespassed onto the land which has caused forms of anti social behaviour that have resulted in complaints from local residents. It is likely this trespass and behaviour will continue in the future, as it has done for many years, unless the Defendants are restrained by an Injunction preventing newcomers from residing on Durham Down, Clifton Down and Ladies Mile.

Further information can be found in the witness statement of Caroline Ennion filed with this claim.

The Claimant therefore seeks an Injunction in the following terms:

1. Persons Unknown residing in tents, caravans or other vehicles adapted for residential purposes be forbidden from:

i. Entering or residing on Durham Down, Clifton Down and Ladies Mile with the intention of residing in tents, caravans or other vehicles adapted for residential purposes within the area shown in Map 1 being hatched red and green.

ii. Defecating and/or urinating in any place other than the public toilets on the land hatched red and green on Map 1.

iii. Depositing household or any other waste material on any part of the land hatched red and green on Map 1

Any person affected by this Order may apply to discharge or vary it by Application to the County Court at Bristol, 2 Redcliff Street, Bristol with a copy to legal.support@bristol.gov.uk at the same time as such Application is made. Such Application can be made by Application Notice or letter setting out details of the Application made and supported by a Statement of Truth on not less than 24 hours notice to the Claimant.

2. A Power of Arrest is attached to the terms of this Injunction Order pursuant to section 4 of Anti-social Behaviour Crime & Policing Act 2014, whereby any Constable may arrest the Defendant without warrant if they have reasonable cause for suspecting a breach of these clauses.

Bristol City Council
City Hall
College Green
PO Box 3399
Bristol
BS1 9NE

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Statement of Truth

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.

- I believe that the facts stated in these particulars of claim are true.
- The Claimant believes that the facts stated in these particulars of claim are true. I am authorised by the claimant to sign this statement.

Signature



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

Date

Day Month Year

Full name

Name of claimant's legal representative's firm

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

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Re-amended Particulars of Claim

The Claimant is the registered proprietor of Durdham Downs, Clifton, Bristol. The Society of Merchant Venturers ('the society') is the registered proprietor of Clifton Downs. A number of Highways surround and cross the Downs. Those Highways are adopted highways for which the Claimant is responsible.

The Defendants are a large number of individuals who occupy caravans, vans, lorries, structures and other associated motorised vehicles or tents on the Downs, both with the grassed areas and the highways.

The Claimant's legal powers and responsibilities

The Claimant performs a number of statutory functions:

- i. Highway authority – for the purposes of the Highways Act 1980
- ii. Local authority - for the purposes of
The Local Government Act 1972, specifically section 222
The Crime and Disorder Act 1998, specifically section 17
The Anti-Social Behaviour Crime and Policing Act 2014
- iii. Manager of The Downs – pursuant to arrangements made under The Downs Act 1861

In addition, the Claimant as the owner of Durdham Downs is also empowered to deal with encroachments onto Clifton Downs pursuant to arrangements with the Society.

Highways Act 1980

As the Highway Authority the Claimant is statutorily responsible for the roads crossing and surrounding the Downs namely: Parrys Lane, Saville Road, Clay Pit Road, Westbury Park, Rockleaze, Downleaze, Roman Road, Stoke Road, Wills Lane and Circular Road.

By section 130 of the Highways Act 1980 it is the duty of the Highway authority to assert and protect the rights of the public to the use and enjoyment of any highway.

By section 130(2) and (5) there is a power to seek injunctive relief

By section 143 of the Highways Act 1980 the Claimant has power to remove any structure from a highway.

By section 148 of the Highways Act 1980 it is an offence to deposit anything on the highway which interrupts the user of the highway.

Anti-Social Behaviour Crime and Policing Act 2014

By section 1 of the Anti-Social Behaviour Crime and Policing Act 2014 the Claimant may seek an Injunction if two conditions are met:

- i. the court is satisfied on the balance of probabilities that the respondent has engaged or threatens to engage in Anti-social behaviour.

- ii. The court considers it just and convenient to grant the injunction for the purposes of preventing the respondent in engaging in anti-social behaviour.

By section 2(1) Anti-Social Behaviour is defined as:

- a. conduct that has caused, or is likely to cause, harassment, alarm or distress to any person,
- b. conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises,

The Clifton and Durdham Down (Bristol) Act 1861

By section XI of the Downs Act 1861 the Claimant may:

- i) make byelaws for the purpose of carrying the Downs Act into execution
- ii) prevent all obstructions and nuisances and from time to time remove any encroachments on the Downs.

Clifton and Durdham Downs - Byelaws

The Downs Byelaws provide:

- i) Paragraph 15 (c) – that no person shall on The Downs intentionally obstruct any other person in the proper use of the Downs, or behave so as to give reasonable grounds for annoyance to other persons on the Downs.

Particulars of nuisance and trespass

The Defendants have for a considerable length of time encamped on the roads for the purposes of residence. The Defendants have never had any authorisation from the Claimant to so reside.

In addition, the use of the roads as a place of residence is accompanied by the deposit of considerable detritus on the roads including household items, general refuse and generators. Furthermore, the Defendants (or some of them) have used other parts of the Downs for the purposes of depositing rubbish and human waste, including both faecal matter and toilet paper which presents a significant public health risk.

The nuisance caused by the Defendants can be summarised as follows. There has been a significant increase in littering and fly-tipping, including the accumulation of general and household waste. This attracts vermin, generates unpleasant odours and create hygiene concerns for the community. Human faeces have been discovered in the bushes on the Downs, creating a clear and unacceptable public health risk which the Claimant has categorised as 'High Impact'. This improper disposal of human excrement in public spaces further creates environmental hazards and risks.

In addition, there has been an increase in anti-social behaviour in the vicinity raising concern for local residents in the form of fights, drug activity and inappropriate behaviour in public spaces. The presence of the Defendants' vehicles has also

resulted in parking issues along the pavements and kerbsides. The high concentration of vehicles on the roads adversely affects the visibility for drivers, and restricts safe access for pedestrians, cyclists and other vehicles seeking to access and use the Downs. Accordingly, the safety of those wanting to use the Downs is compromised by vehicles obstructing and interfering with their safe passage.

Furthermore, the presence of the vehicles and the associated conduct constitutes a nuisance and anti-social behaviour as defined above, in that persons using the Downs have been inconvenienced and threatened by persons encamped on the roads and on the Downs themselves. Such conduct amounts to a breach of the 2014 Act, specifically section 2(1)(a) in respect of users of the Downs and section 2(1)(b) in respect of local residents.

On 2 and 11 December 2025 the Claimant's officers attended all the vehicles encamped on the roads and served notices informing the occupiers that they were trespassing and inviting them to vacate. Between the dates of 2 and 11 December 2025 the Claimant's officers attended and carried out welfare assessments, to better inform the Claimant's officers of any vulnerabilities among the person occupying the vehicles and to enable those persons if necessary to be sign posted to alternative provision which the Claimant might be able to provide and/or provide alternative support under its various statutory functions.

More than 50 vehicles remain encamped on the roads. Possession proceedings have been initiated to recover possession of the roads on the basis of this being a trespass onto the highway. The Defendants may well return to the land once any possession order made by the Court is enforced, and given the history of the trespass onto these roads over the last several years there may well be further trespasses by the Defendants and Newcomers – causing loss and damage to the Claimant and lawful users of the Downs and the roads. So, unless restrained by the Court the Defendants and/or newcomers will continue to repeat the acts upon which complaint has been made.

PARTICULARS OF INCONVENIENCE, LOSSES AND EXPENSE

The Claimant has incurred considerable expense in removing waste material from the roads and the Downs themselves. This includes refuse collection, sanitation and repair of damaged features. In addition, organisations who have used the Downs for public functions have suffered considerable inconvenience and loss in relation to interference from persons trespassing on the roads and the Downs. As a result of interference with those activities necessitating extra security measures.

The trespass and nuisance caused by the Defendants has severely impacted lawful users of the roads and the Downs themselves.

The cost to the Claimant since the start of these proceedings and exceeds £80,000.

RELIEF SOUGHT

The Claimant claims an Injunction restraining the Defendants from:

- i. Entering or being present, within the area shown in the Map attached to this injunction, being:
 - a. Clifton Down, Durdham Down and Ladies Mile (edged and hatched red and green)**
 - b. Parrys Lane, Saville Road, Downleaze, Rockleaze, Circular Road, Roman Road, Clay Pit Road, Stoke Road, Wills Lane and Westbury Park (coloured blue)**
with the intention of residing in any tent, structure, caravan, van, or vehicle.**

- ii. Defecating and/or urinating, other than in the public toilets, within the area shown in the Map attached to this injunction edged and hatched red, green and blue.**

- iii. Placing household or any other waste material within the area shown in the Map attached to this injunction edged and hatched red, green and blue. For the avoidance of doubt, this prohibits the use of the public bins.**

- iv. Causing any nuisance, harassment, alarm or distress to any person lawfully on Durdham Down, Clifton Down, Ladies Mile, Parrys Lane, Saville Road, Downleaze, Rockleaze, Circular Road, Roman Road, Clay Pit Road, Stoke Road, Wills Lane and Westbury Park by way of any or all of
 - (1) dangerous driving of any vehicle,**
 - (2) verbal or physical abuse or threats**
 - (3) unreasonable levels of noise**
 - (4) allowing any animal to be out of control and/or**
 - (5) disposing of waste except in a manner expressly permitted in writing by Bristol City Council.****

BETWEEN:-

BRISTOL CITY COUNCIL

Claimant

AND

**PERSONS UNKNOWN ON LAND
KNOWN AS DURDHAM DOWN, CLIFTON DOWN
AND LADIES MILE RESIDING
IN TENTS, CARAVANS, STRUCTURES, OR OTHER VEHICLES
ADAPTED FOR RESIDENTIAL PURPOSES**

Defendant

DRAFT ORDER

BEFORE District Judge Napier sitting at the County Court at Bristol

The Court ordered that To all Persons Unknown on Clifton Down, Durdham Down, Ladies Mile, Parrys Lane, Saville Road, Downleaze, Rockleaze, Circular Road, Roman Road, Clay Pit Road, Stoke Road, Wills Lane and Westbury Park who are residing, or intend to reside, in tents, caravans, structures, or other vehicles adapted for residential purposes.

You are forbidden (whether by yourselves or by instructing or encouraging or permitting any other person) from:

- i. Entering or being present, within the area shown in the Map attached to this injunction, being:
 - a. Clifton Down, Durdham Down and Ladies Mile (edged and hatched red and green)
 - b. Parrys Lane, Saville Road, Downleaze, Rockleaze, Circular Road, Roman Road, Clay Pit Road, Stoke Road, Wills Lane and Westbury Park (coloured blue)with the intention of residing in any tent, structure, caravan, van, or vehicle.
- ii. Defecating and/or urinating, other than in the public toilets, within the area shown in the Map attached to this injunction edged and hatched red, green and blue.
- iii. Placing household or any other waste material within the area shown in the Map attached to this injunction edged and hatched red, green and blue. For the avoidance of doubt, this prohibits the use of the public bins.

- iv. Causing any nuisance, harassment, alarm or distress to any person lawfully on Durdham Down, Clifton Down, Ladies Mile, Parrys Lane, Saville Road, Downleaze, Rockleaze, Circular Road, Roman Road, Clay Pit Road, Stoke Road, Wills Lane and Westbury Park by way of any or all of
- (1) dangerous driving of any vehicle,
 - (2) verbal or physical abuse or threats
 - (3) unreasonable levels of noise
 - (4) allowing any animal to be out of control and/or
 - (5) disposing of waste except in a manner expressly permitted in writing by Bristol City Council.

YOUR ATTENTION IS DRAWN TO YOUR RIGHT TO APPLY TO THE COURT TO SET ASIDE OR VARY THIS INJUNCTION

Any application must be made to the County Court at Bristol at the Bristol Civil Justice Centre, 2 Redcliff Street, Bristol, BS1 6GR or by email e-filing.bristol.countycourt@justice.gov.uk

Your application must be made on HMCTS Form N244 or by way of a letter provided it is signed with a statement of truth and a copy must be sent to legal.support@bristol.gov.uk at the same time it is filed with the Court. A hearing will then be arranged with no less than two clear days' notice to all parties, or shorter if the parties agree or the Court orders otherwise.

This order shall remain in force until ([[further] order of the Court) at 11:59 PM unless before then it is revoked by further order of the court

The court is satisfied that the conduct which is prohibited by this injunction, consists of or includes the use or threatened use of violence and there is a significant risk of harm to a person towards whom the conduct prohibited by this injunction is directed.

YOU MUST COMPLY WITH THIS ORDER PENDING ANY HEARING

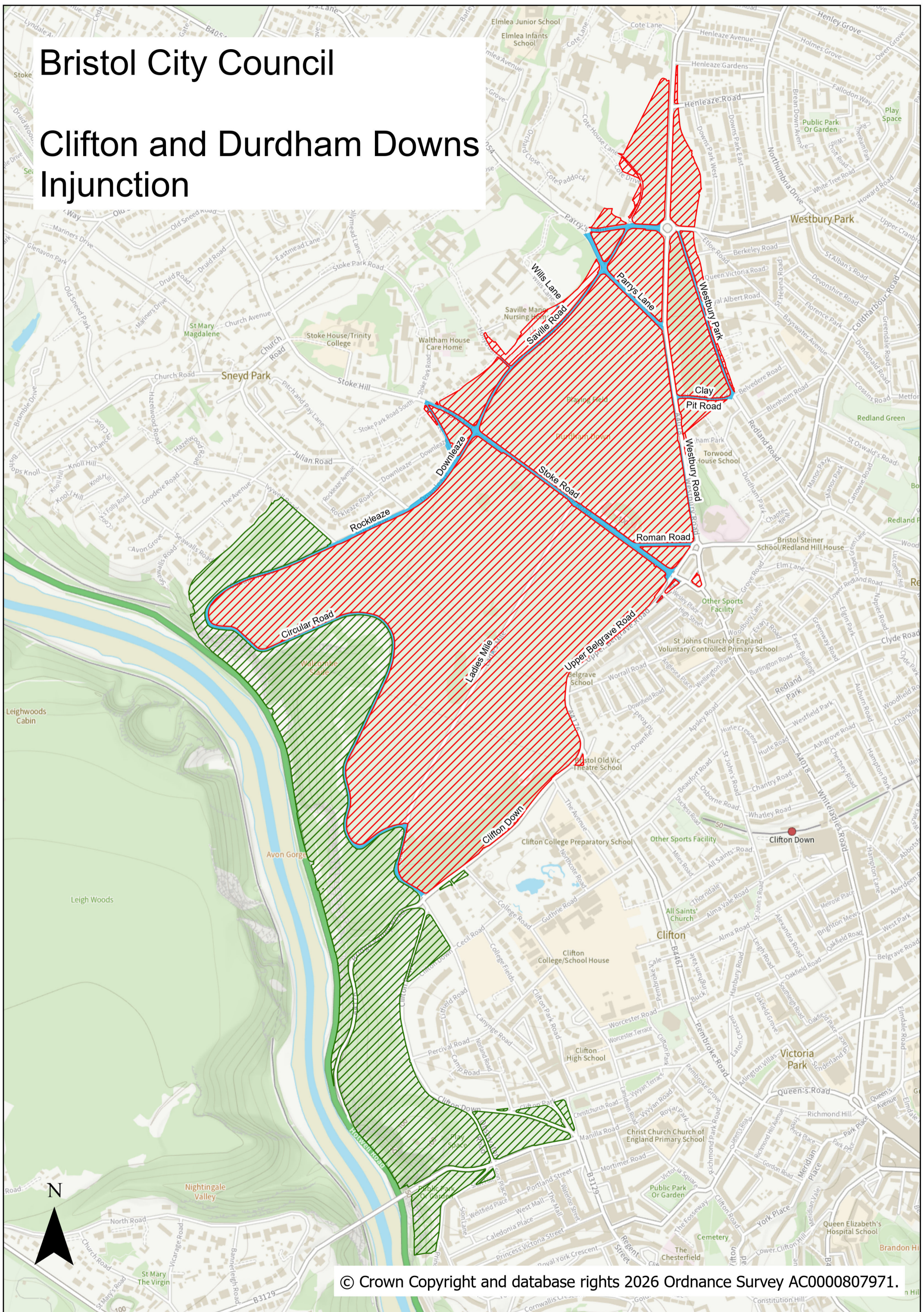
A power of arrest is attached to (all the terms) of this injunction whereby any constable may under the power given in section 9 of the Anti-social Behaviour Crime & Policing Act 2014, arrest without warrant the defendant if the constable has reasonable cause for suspecting the defendant is in breach of any of those terms of this injunction.

FURTHER REVIEW

The Claimant may by 4.30pm on (date 12 months from the grant of this order) make an application to the Court (accompanied by any evidence in support) and seek the listing of a review hearing at which the continuation or extension of the Injunction will be considered.

Bristol City Council

Clifton and Durdham Downs Injunction





Claim form for possession of property

In the County Court at Bristol	
Claim no.	N00BS177
Fee Account no.	PBA 0083472

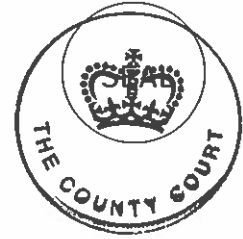
You may be able to issue your claim online and it may save you time and money. Go to www.possessionclaim.gov.uk to find out more.

Claimant

(name(s) and address(es))

Bristol City Council
City Hall
College Green
PO Box 3300
Bristol
BS1 9LN

AMENDED CLAIM FORM DATED
25.02.2026 PURSUANT TO CPR
17.1(1)



Defendant(s)

(name(s) and address(es))

Persons Unknown

Parrys Lane, Saville Road, Clay Pit Road, Westbury Park, Rockleaze, Downleaze, Roman Road, Stoke Road, Wills Lane and Circular Road

The claimant is claiming possession of :

Parrys Lane, Saville Road, Clay Pit Road, Westbury Park, Rockleaze, Downleaze, Roman Road, Stoke Road, Wills Lane and Circular Road the roads coloured blue on the attached plan

which ~~(includes)~~ (does not include) residential property. Full particulars of the claim are attached. (The claimant is also making a claim for money).

This claim will be heard on:

Thursday / Friday, 16/17th of April 2026 at 10:00 am/pm
at Bristol County Court
Bristol Civil and Family Justice Centre
2 Redcliff Street
Bristol, BS1 6GR

At the hearing

- The court will consider whether or not you must leave the property and, if so, when.
- It will take into account information the claimant provides and any you provide.

What you should do

- Get help and advice immediately from a solicitor or an advice agency.
- Help yourself and the court by **filling in the defence form** and **coming to the hearing** to make sure the court knows all the facts.

Defendant's name and address for service

Persons Unknown
Parrys Lane, Saville Road, Clay Pit Road, Westbury Park, Rockleaze, Downleaze, Roman Road, Stoke Road, Wills Lane and Circular Road

Court fee	£404
Legal representative's costs	£69.50
Total amount	£473.50

Issue date 18/02/26

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Claim No.

Grounds for possession

The claim for possession is made on the following ground(s):

- rent arrears (online issue available)
- other breach of tenancy
- forfeiture of the lease
- mortgage arrears (online issue available)
- other breach of the mortgage
- trespass
- other (please specify) _____

Anti-social behaviour

The claimant is alleging:

- actual or threatened anti-social behaviour
- actual or threatened use of the property for unlawful purposes

Is the claimant claiming demotion of tenancy?

Yes No

Is the claimant claiming an order suspending the right to buy?

Yes No

See full details in the attached particulars of claim

Does, or will, the claim include any issues under the Human Rights Act 1998? Yes No

Statement of Truth

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.

I believe that the facts stated in this claim form are true.

The Claimant believes that the facts stated in this claim form are true. I am authorised by the claimant to sign this statement.

Signature



Claimant

Litigation friend (where claimant is a child or a patient)

Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

04

02

2026

Full name

Althia Stephens

Name of claimant's legal representative's firm

Bristol City Council Legal Services

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

Solicitor

Claimant's or claimant's legal representative's address to which documents or payments should be sent if different from those shown on the first page.

Building and street

Second line of address

Town or city

County (optional)

Postcode

If applicable

Phone number

Fax phone number

DX number

Your Ref.

Email

**Particulars of claim
for possession
(trespassers)**

In the
County Court at Bristol

Claim No. **N00BS177**

Bristol City Council

AMENDED PARTICULARS OF CLAIM
DATED 25.02.2026 PURSUANT TO
CPR 17.1(1)

Persons Unknown



Claimant

Defendant(s)

1. The claimant has a right to possession of:
Parrys Lane, Saville Road, Clay Pit Road, Westbury Park, Rockleaze, Downleaze, Roman Road, Stoke Road, Wills Lane and Circular Road the roads coloured blue on the attached plan

which is occupied by the defendant(s) who entered or (~~has~~)(have) remained on the land without the claimant's consent or licence.

2. The defendant(s) (~~has~~)(have) never been a tenant or sub-tenant of the land.
3. The land mentioned at paragraph 1 does (not) include residential property.
4. The claimant's interest in the land (or the basis of the claimant's right to claim possession) is
Give details:
The Claimant is the Highways Authority and has overall responsibility for all Highways surrounding The Downs.

Please see attached the statement of Robert Archer.

5. The circumstances in which the land has been occupied are
Give details:

The Defendants have been residing in their vehicles on the Highways surrounding The Downs for some time.

On 02.12.2025 and 11.12.2025 the Claimant's Neighbourhood Enforcement Team ('NET') served notices on all vehicles on the Highways requesting that they vacate the roads, as they do not have permission or consent to remain. Few vehicles have left the Highways and in excess of 80 remain. It is necessary to seek possession of the Highways as the Claimant has categorised The Downs encampment as "High Impact" requiring enforcement action.

Please see the witness statement of Kurt James and Robert Archer filed with this claim.

The Defendants have encamped on these roads for the purposes of residence. This has created an accumulation of general and household waste along these roads. In addition, human waste has been discovered in the bushes of the Downs which causes public and environmental risks. The Defendant's presence also restricts safe access to the community and users of the Downs. Despite the Claimant's request for the vehicles to vacate the roads the Defendants remain, and their occupation is interfering with the use and enjoyment of the Downs and is a continuing trespass. The NET have conducted welfare assessments on the Defendants to ascertain their needs and ensure appropriate referrals are made for housing and Meanwhile site support. The Defendants cannot remain on the roads for the purposes of residence, and as such the Claimant has issued this claim for possession pursuant to CPR 55, to seek an Order for Possession.


6. The claimant does not know the name(s) of (all) the defendant(s).
7. The claimant asks the court to order that the defendant(s):
 - (a) give the claimant possession of the land;
 - (b) pay the claimant's costs of making this claim.

Statement of Truth

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.

- I **believe** that the facts stated in these particulars of claim are true.
- The Claimant** believes that the facts stated in these particulars are true. **I am authorised** by the claimant to sign this statement.

Signature



- Claimant
- Litigation friend (where claimant is a child or a patient)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

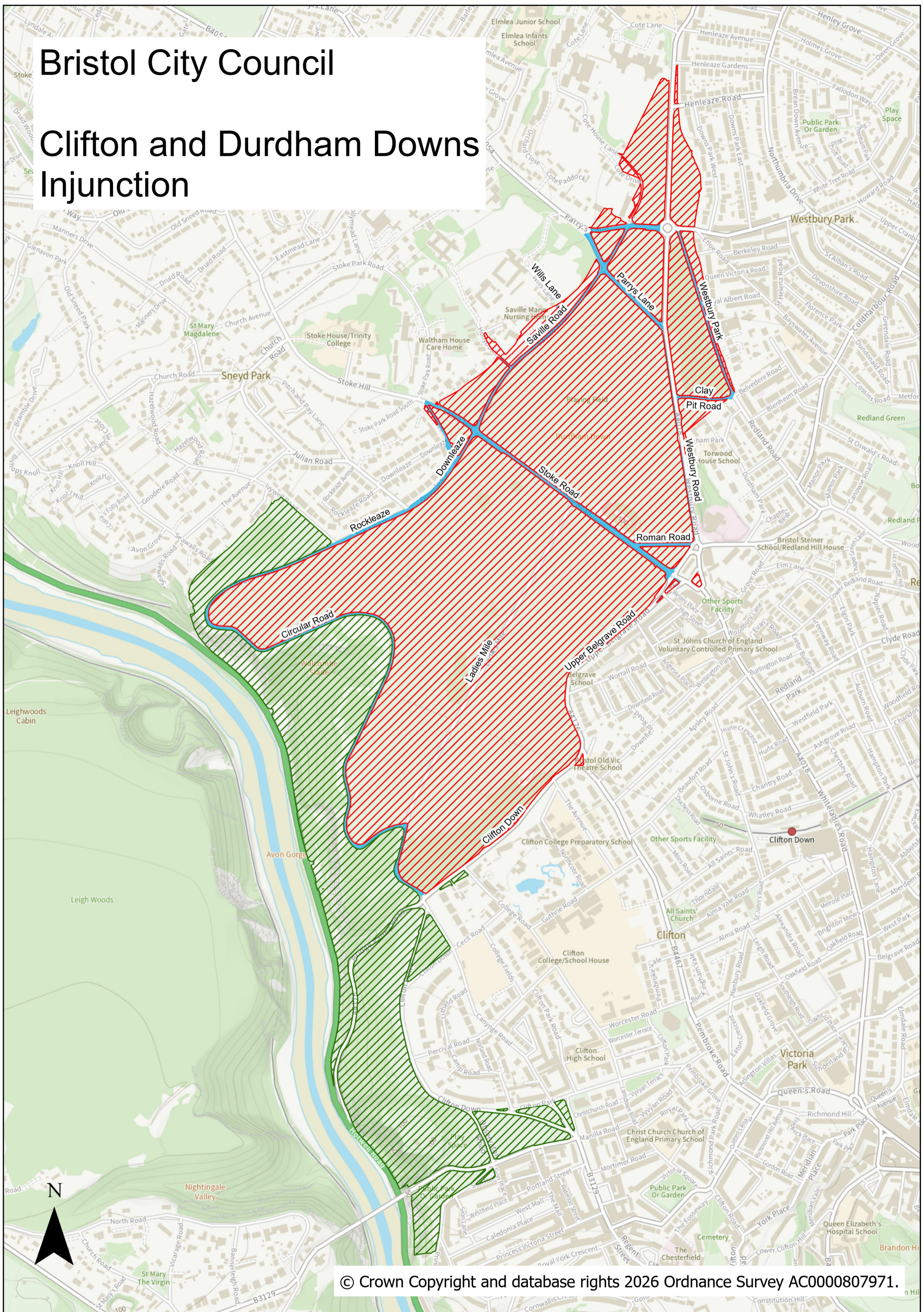
Full name

Name of claimant's legal representative's firm

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

Bristol City Council

Clifton and Durdham Downs Injunction



Defence form

In the
County Court at Bristol

Claim No.

N00BS177

BRISTOL CITY COUNCIL

Claimant

PERSONS UNKNOWN

Defendant(s)

I dispute the claimant's claim because:-

Statement of Truth

*(I believe)(The defendant(s) believe(s)) that the facts stated in this defence form (and any continuation sheets) are true.

* I am duly authorised by the defendant(s) to sign this reply form.

signed _____ date _____

*(Defendant(s))(Litigation friend(*where the defendant is a child or a protected party*))(Defendant's solicitor)

**delete as appropriate*

Defendant's date of birth

	D	M	M	Y	Y	Y	Y
--	---	---	---	---	---	---	---

Full name _____

Name of defendant's solicitor's firm _____

position or office held _____

(if signing on behalf of firm or company)

Defendant's or
defendant's solicitor's
address to which
documents should
be sent.

Postcode

if applicable

Ref. no.

fax no.

DX no.

e-mail

Tel. no.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form:
<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>



Privacy notice for Civil Court forms

Purpose

This privacy notices sets out the standards that you can expect from the Ministry of Justice (MoJ) and Her Majesty's Court and Tribunals Service (HMCTS) when we process personal about you in the context of civil court proceedings; how you can get access to a copy of your personal data; and what you can do if you think the standards are not being met.

HMCTS is an Executive Agency of the Ministry of Justice (MoJ). MoJ is the data controller for the personal data held, although it may act jointly with HMCTS. HMCTS also collects and processes personal data for the exercise of its own and associated public functions and legal obligations.

This privacy notice does not apply to the processing of personal data which is collected and controlled by the court (and its judges) during legal proceedings. The judiciary are independent from MoJ and HMCTS and data protection law applies differently to them as a result. For more information, see www.judiciary.gov.uk.

About personal data

Personal data is information that relates to a living individual who can be identified from the data.

It does not include information relating to dead people, groups or communities of people, organisations or businesses. It can be your name, address or telephone number. It can also include information about your gender, your financial circumstances, your cultural background or your social status.

We know how important it is to protect the privacy of all individuals involved in court proceedings and to comply with data protection laws. HMCTS will safeguard your personal data and will only disclose it where lawful to do so, or with your consent.

Types of personal data we process

We only process personal data that is relevant for meeting our legal obligations and for the administration of justice. The types of data collected from court forms may include: your name, address, contact details, your economic circumstances, ethnicity, religious beliefs and the details of any other persons, including children who the proceedings relate, or those who may have an interest in the proceedings.

The personal data will usually be obtained directly from you or from another person who has included your data in a court form which they have completed. Your personal data may also be obtained from other sources throughout the course of proceedings, for example from professional organisations such as a local authority or the police, or another party to the proceedings.

Civil proceedings hearings are generally heard in public. This means that others may overhear your personal information whilst sitting in the courtroom. However, the Rules provide for circumstances where hearings may be held in private, and for circumstances where the identity of parties or witnesses may be kept confidential (please refer to the Civil Procedure Rules).

Details of transfers to third countries

It may sometimes be necessary to transfer personal data overseas for the establishment, exercise or defence of legal claims. The reasons for the transfer and the recipient third country will always depend on the circumstances of the case but any such transfers will be made in full compliance with all aspects of the law ('third country' means a country outside the EU).

To find out more information, you can contact us by emailing: data.compliance@justice.gov.uk.

Retention period for information collected

Government departments, agencies, and all other public-sector bodies are instructed to retain any and all documentation, correspondence, notes, e-mails and all other information (however held) which contain or may contain content pertaining directly or indirectly to the sexual abuse of children or to child protection a care. The word 'children' relates to any person under the age of 18.

Different retention periods apply based on the type of proceedings you are involved in. To find out the retention periods and other information which may be useful to you please see:

<https://www.gov.uk/government/publications/record-retention-and-disposition-schedules>

Access to personal information

You can find out if HMCTS hold any personal data about you by making a 'subject access request'. You can make a subject access request by emailing: Data.access@justice.gsi.gov.uk

You can get more details on agreements with other organisations for sharing personal data; production of statistics; how staff collect, use or delete personal data; how accuracy of information is maintained and how to make a complaint.

For more information about the handling of personal data or for any other queries, please contact our Data Protection Officer by email: datacompliance@justice.gov.uk

Complaints

When we ask you for information, we will keep to the law. If you consider that your information has been handled incorrectly by HMCTS or MoJ, you can contact the Information Commissioner for independent advice about data protection. You can contact the Information Commissioner here:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Phone: 0303 123 1113

www.ico.org.uk