On behalf of: Claimant
Witness: Caroline Ennion
Statement: 1st
Exhibits: CE1-CE9
Date: 26 June 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NO:**

B E T W E E N :-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

WITNESS STATEMENT OF
CAROLINE ENNION

I, CAROLINE ENNION of Sea Mills depot, 41 Sea Mills Lane, Bristol City Council will say as follows:

1. I am employed by the Claimant as the Area Park Manager, and I am authorised to make this statement.

2. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information

supplied by others, the source of information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

3. I make this statement in support of the Claimant's application for an Injunction concerning Durdham Down, Clifton Down and Ladies Mile ("The Downs").

4. The Claimant is the registered proprietor of Durdham Down I attach a map of all the parcels of land that make up The Downs **Exhibit "CE1"** and copy of the Register of Title and Title Plan under Title Number BL115544. **Exhibit "CE2".** The Claimant is also the Highways Authority and owns Ladies Mile highway which is an unclassified adopted road for which the Claimant is responsible for **Exhibit "CE3".**

5. Clifton Down is owned by the Merchant Venturers Society of Bristol, but under the terms of the Clifton and Durdham Downs Act (Bristol) 1861 the Claimant, through its Downs Committee is responsible for the management and maintenance of this area as a place for public recreation and is entitled to possession.

6. The Claimant has been granted, by the Merchant Venturers Society, the registered proprietor of Clifton Down with permission to include this area of The Downs in this possession order for the better management of the Claimant's land and the surrounding location. **Exhibit "CE4"**. I exhibit a copy of the plan of Clifton Down and the Act, which shows Merchant Venturers Society as the owner of the land **Exhibit "CE5"**.

7. I attach the UAE Plan and map of the land currently occupied by the Defendants. **Exhibit "CE6"**.

8. On 17.06.2025, the Claimant obtained Order for Possession of the majority of the land comprising The Downs. I produce this as "**Exhibit CE7"** it will be noted that a small area of land adjoining Circular Road and Ivywell Road was not included. Nor was a section to the North of The White Tree roundabout.

9. An eviction was successfully carried out on 20.06.2025 by High Court enforcement

officers. Unfortunately, the travellers concerned then went onto the area to which I have referred, and they are now subject to fresh proceedings under Claim No. M00BS922, which claim also includes other areas of the Downs not included in the first set of proceedings. So, if the current occupiers on what I would call the Ivywell Road section of the Downs moves onto any other part of the entirety of The Downs a restitution order will be available.

10. Over the course of 25-26 June 2025, a new trespass has occurred on the area surrounding Ladies Mile, but not on Ladies Mile itself. As the Writ has been executed, we cannot use it again as this is a new trespass. I therefore seek an Order for Possession of the land which was the subject of Claim No. M00BS793 again in these proceedings.

11. In the circumstances I also have no alternative but to invite the Court to grant an Injunction to restrain any trespass on Clifton and Durdham Downs, and I invite the Court to grant that relief.

12. This new trespass (which is significant) confirms how every year The Downs is occupied by substantial numbers of travellers starting in about April and finishing in October. They occupy different areas of The Downs at different times. The number of encampments vary each year but this year there have been 5 separate groups, they represent a health and safety hazard as the examples from this year as given below.

13. On 11th April 2025, I was informed by The Downs Supervisor that there was an unauthorised traveller encampment on The Downs. Since this time the first group have been succeeded by another 4 groups. We were aware of this last group arriving on Monday 2nd June 2025 and they have not yet vacated The Downs. The travellers had accessed the site by driving onto The Downs from Ladies Mile. The Downs (one part or another) have been occupied continuously apart from a 5 day break since 11th April 2025 and the Claimant has incurred significant costs removing and clearing the fly tip after each visit. Between 14th and 24th April for example, the Downs team removed 1.86 tonnes of fly tip left following just two of

these encampments. It takes a significant amount of time to clear this fly tip and while they are doing this, The Downs team are unable to carry out their regular park duties. Vehicles going to and from the traveller encampment are driving across the parkland. The last traveller encampment also had quad bikes which they were driving around the grass areas at speed. These vehicles on the grass pose a health and safety threat to other park users, the travellers themselves and The Downs staff.

14. The van dwellers occupy the highways around The Downs all year round. Previously, they have mostly been concentrated along Parry's Lane but this year, the occupation has spread onto Ladies Mile and elsewhere on the Downs which is adjacent to the land that is currently occupied by the travellers. There were 11 vehicle dweller vans/caravans on Ladies Mile on 18th May 2025; on 4th June this increased to 13; as of the 12th June there were 11. The increased numbers cause problems because they obstruct the highway, prevent parking for recreational purposes and visitors to The Downs. There has already been an accident with a speeding car driving into a dwelt in vehicle on The Downs, luckily no one was injured. However, this would have significantly more severe consequences if this should happen between a pedestrian and a vehicle on the green space or if there had been gas canisters in or near the vehicle, which there quite often are.

15. There have been a number of tented encampments on The Downs. The Council has worked with St Mungo's (a homelessness charity) to offer support to the Defendants to find alternative accommodation and many of these have moved on. The location of a currently occupied tent is shown in **Exhibit "CE8".**

16. None of the Defendants have the Claimant's consent to occupy or remain on the Downs.

17. The scrub and woodlands have become a health hazard due to human excrement in the bushes and a large amount of litter and fly tip. The Claimant regularly receives complaints about anti-social behaviour from the encampments from local residents and park users. The Avon Gorge and Downs Wildlife Project has had to

cancel all their education events since the occupation because of the encampments, both because of safeguarding issues and the unsanitary state of their normal teaching areas. The Downs grounds maintenance team have submitted 4 incident reports of anti-social behaviour associated with travellers which occupied the site between 19th May and 2nd June 2025. Park users report that they also feel unsafe because of the travellers, tents and van dwellers on The Downs.

18. There are scheduled events that take place on The Downs and the presence of unauthorised encampments potentially prevents these events going ahead which could involve significant financial loss and reputational damage to the organisers and the client. The trespass which was removed on the 20.06.2025 did pose potential problems for the Race for Life which was scheduled for 21 – 22.06.2025, and this is only going to continue.

19. The concentration of multiple different users of The Downs - van dwellers, travellers, park users and event attendees causes a great deal of conflict and there have been multiple reports to the police about anti-social behaviour and assault between members of the different groups.

20. There is an ongoing risk of trespass onto any part of The Downs and Ladies Mile highway by further groups of travellers, considering the number of times that it has been trespassed upon by vehicle dwellers, tents and traveller encampments so far this year. The Claimant would like to mitigate this risk by seeking an Injunction preventing any future encampment.

21. I would submit that this may be a more effective deterrent than the current regime, which is to issue summary proceedings for possession, or on the odd occasion the s.77/78 process under the Criminal Justice and Public Order Act 1994. A number of problems exist with that procedure, such as how the Order is enforced (we would not have access to a Court appointed Bailiff or High Court Enforcement Officer). The Police did use their powers under 62A of the 1994 Act on one occasion last year, on a particularly violent and aggressive group of trespassers on The Downs.

Although the trespassers did leave, there may have been an issue in respect of effectively removing them physically. There are byelaws in respect of The Downs, but enforcement would usually be by way of a fine, and we do not know the identity of any Defendant. The Public Spaces Protection Order regime will not assist either, as breach will be a fixed penalty notice or a fine, which is not really an effective remedy against unknown persons.

22. I now turn to the areas of land that are subject to Court proceedings.

23. I produce as **Exhibit CE9** a plan showing the Clifton and Durdham Downs in its entirety I call this Map 1 and it will be referenced in the Orders I seek from the Court.

    The areas hatched green on the plan are the areas subject to proceedings under Claim No. M00BS922.

    The areas hatched red on the plan were subject to the proceedings under claim number M00BS793 heard on 17.06.2025, in respect of which I seek a new possession order.

24. For the avoidance of doubt and clarification I seek an injunction against the entirety of the land hatched red and green on the plan, which will be noted does include Ladies Mile, but excludes Circular Road, Stoke Road and Parry's Lane.

25. Ladies Mile has been included in this injunction and possession as it is a well-known area of The Downs which is often used by travellers to establish an encampment on the grass. New vehicle dwellers had started to occupy this road, as other locations on roads across The Downs are filled up. This injunction is intended to send a message to the van dweller community of our intention to take action, protect dwindling parking spaces around The Downs for park and event users, reduce the risk to The Downs grounds team and Council assets in The Downs depot and protect future events and the Avon Gorge and Downs wildlife project that are both concentrated in that part of The Downs.

26. We have considered applying this injunction to all the highways across and around The Downs, but this would cause displacement of around 150 vans/caravans which would move to other places in the city and cause more issues. Dealing with van dwelling is complex so is being tackled with as a city-wide issue that needs to balance offering support to vehicle dwellers, alongside considering the needs of the local community. In addition, we have to acknowledge that the vast majority of people who reside in vans on the highways around The Downs live and/or work or have Bristol connections. The Defendants who are currently occupying the Downs and Ladies Mile which is the subject of these proceedings and under Claim No. M00BS793 do not, I believe, have such connections.

27. Considering the significant history of occupation of the Land, the associated anti-social behaviour, the Claimant is also asking for an Injunction to be made against the Defendants in terms which would prevent re-occupation and I respectfully ask the Court to grant an injunction in the following terms:

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

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.

28. This order obviously does not affect any travelling showman or other worker employed in connection with any of the events that we license on The Downs, as

obviously the organisation with whom they are working will have a license from the Claimant to use The Downs and it is of course essential that provision for their accommodation is made available.

29. The Claimant submits that an Injunction is just and proportionate and that there are no other practical alternatives, other than issuing these proceedings, to prevent future encampments which can become extremely costly and time consuming for the Claimant. Without an Injunction the Claimant's only other alternative is to issue possession proceedings, on each occasion that the Land and Highway are trespassed upon. Therefore, the Claimant submits that it is, just and convenient for an Injunction on the above terms to be granted. The Order sought has a very clear and quite narrow geographical limit, paying due respect to the observation of the Supreme Court (upon which our Legal Adviser will address the Court).

30. I now turn to service of the Applications and Orders.

31. Before I turn to that I now address timing. I am advised that service of the Injunction application has to be on at least 3 clear working days' notice. I have instructed my legal team to issue these proceedings as urgently as possible, and to seek an early hearing date, so if the Court was to issue the proceedings on Friday 27 June the earliest date we can have for a hearing is 03.07.2025. I am hoping that we will have a possession order granted on 27.06.2025, in respect of the land hatched red, which I suspect can be enforced no earlier than 02.07.2025 because of Police resources being unavailable due to the Glastonbury festival.

32. There are currently at least 50 caravans encamped on one half of The Downs. The chances of more arriving must be seen as high, I would therefore invite the Court to abridge time for service of the application for an Injunction and the possession proceedings to 4pm on Monday 30.06.2025, subject to judicial availability and list both the possession and injunction hearings on 1st or 2nd July 2025.

33. The Applications for possession an Injunction and abridgment of time will be served on the land and affixed to lamp posts and fences in visible areas and all

around the land hatched red and green on Map 1 we will also as far as possible ensure that every caravan currently on the land hatched red and green has a copy of the application and my evidence attached to it or given to an occupier.

34. As to service of any Order granted, copies will be attached to prominent features on the Downs, such as lamp posts, and published on the Claimant's website, and served on all occupiers on the land hatched red and green on Map 1.

35. A new trespasser will be provided with a copy of the Injunction and this statement, and invited to comply with it before action is taken to enforce it.

36. With regards to the requested action, consideration has been given to the Defendants' rights, specifically Articles 8 (private and family life) and 11 (freedom of assembly) of the European Convention on Human Rights which are engaged by the terms of the proposed order. The Claimant has considered that any interference to the Defendants human rights is justified in the interests of pursuance of a legitimate aim, to protect the wider community. The Claimant considers that in the circumstances the granting of an Injunction Order is proportionate and necessary.

37. I have not carried out any welfare assessments of any of the occupiers of the 30 new caravans. The number on The Downs is now so significant I have to take action as a matter of urgency and although I am seeking an abridgement of time the Defendants still have a right of access to this Court to make representations should any issues arise which engage the Claimant's responsibilities as a public authority.

38. I therefore ask that the Court grants an injunction in the above terms and Order for possession forthwith of the land hatched red. Also seek an order for transfer of these proceedings for possession to the High Court for enforcement.

Statement of Truth

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

proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: Caroline Ennion

Dated: 26.06.2025

On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE1

IN THE COUNTY COURT AT BRISTOL **CLAIM NO:**

BETWEEN:

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendant

EXHIBIT CE1



Bristol City Council

Land covered by the possession order M00BS793 dated 17/06/2025.

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PARKS & GREEN SPACES

Scale 1:10,000 @A4
Date 23/06/2025

GROWTH & REGENERATION DIRECTORATE
MANAGEMENT OF PLACE SERVICE

GIS & Asset Management Team
Bristol Parks Service
Bower Ashton Depot, Kennel Lodge Rd Bristol
bristolparks@bristol.gov.uk
www.bristol.gov.uk/parks

On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE2

IN THE COUNTY COURT AT BRISTOL CLAIM NO:

BETWEEN:

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendant

EXHIBIT CE2

Official copy of register of title

Title number BL115544 Edition date 02.06.2016

- This official copy shows the entries on the register of title on 30 NOV 2020 at 12:53:39.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 30 Nov 2020.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Gloucester Office.

A: Property Register

This register describes the land and estate comprised in the title.

CITY OF BRISTOL

1 (07.04.2009) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Durdham Down, Bristol.

NOTE: The land tinted green on the title plan is not included in the title.

2 (07.04.2009) The land has the benefit of the rights reserved by but is subject to the rights granted by a Conveyance of Downside dated 12 October 1922 made between (1) Christopher George and Edward Mortimer Harley (2) Christopher George, Edward Mortimer Harley and The Public Trustee and (3) The University Of Bristol.

NOTE: Copy filed.

3 (07.04.2009) The Conveyance dated 14 May 1969 referred to in the Charges Register contains the following provision:-

"It is hereby declared that the Corporation shall not become entitled to any easement or right of light or air or other easement or right which would restrict or interfere with the free use of its adjoining land by the University or any persons deriving title under it for building or for any other purpose"

4 (07.04.2009) The land has the benefit of but is subject to the following rights granted by a Deed dated 21 February 1986 made between (1) The City Council of Bristol and (2) University of Bristol:

"The Council as Beneficial Owner hereby grants unto the University and its successors in title full right and liberty:-

(i) to enter onto the blue land with or without workmen for the purpose of constructing an accessway in the approximate position shown coloured pink hatched black and for the purpose of improving the accessway shown coloured pink on the said plan

(ii) to go pass and repass (in common with the Council and all other persons similarly entitled) at all times with or without vehicles over and along the said accessway shown coloured pink and pink hatched black for the purpose of gaining access to and egress from the brown land and

A: Property Register continued

Grange Cottage and for no other purpose whatsoever

(iii) to enter onto the blue land as aforesaid for the purpose of laying or constructing such pipes sewers or service cables under the land shown coloured pink and pink hatched black as may be reasonably necessary for the benefit of the brown land together with the right of full free and uninterrupted passage of water soil gas and electricity through such pipes sewers and service cables together also with the right to enter upon the blue land for the inspection maintenance and repair of the said pipes sewers and service cables making good nevertheless at its own expense all damage or disturbance which may be caused to the blue land in the exercise of such rights

TO HOLD the same unto the University in fee simple

2. In University hereby covenants in pursuance of Section 33 of the Local Government (Miscellaneous Provisions) Act 1982

(i) to complete the works of constructing and improving the accessway and of laying the pipes sewers and service cables to the satisfaction in all respects of the City Engineer and thereafter to maintain the same to the like satisfaction".

NOTE: The brown land and the blue land are tinted yellow and edged mauve respectively on the title plan.

NOTE 2: The land coloured pink hatched black is hatched mauve and cross hatched mauve on the title plan.

NOTE: The land coloured pink is hatched mauve on the title plan.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (07.04.2009) PROPRIETOR: THE CITY COUNCIL OF BRISTOL of City Hall, College Green, Bristol BS1 5TR.

2 (07.04.2009) The value stated as at 7 April 2009 was £20,000.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (07.04.2009) The land is subject to rights of drainage and rights in respect of water, gas and electricity supply services.

2 (07.04.2009) The land is subject to a right of way over the land at the front of 42 Durdham Park subject to the payment of a fair proportion of the cost of maintenance.

3 (07.04.2009) The land is subject to the following rights granted by a Conveyance of the land tinted mauve on the title plan and other land dated 9 June 1855 made between (1) William Fowler (2) Henry Lee (3) John Henry Greville Smyth and others and (4) William Hicks:-

The said John Henry Greville Smyth Digby Lord Middleton and Marrianne Colston according to their several and respective shares and estates and so far as they respectively lawfully could did by the now abstracting Indenture grant unto the said William Fowler and Henry Lee their and each of their heirs and assigns in respect of the said Messuage Garden shrubbery and hereditaments called Redland Lodge and to the several persons then respectively seized of and entitled to the said seven several plots of land Messuages and offices respectively and whose names and descriptions are written opposite such numbers respectively in the Second Schedule thereunder written and to their

C: Charges Register continued

several and respective heirs and assigns in respect of the said several plots of land Messuages and Offices of and to which they were respectively seized and entitled full right and free liberty to make and form over the said strip of Common delineated in the said plan and therein coloured blue and brown the seven several roads delineated in the said plan and therein coloured brown of the dimensions therein specified and to place seven several Gates in the hedge or boundary of the said strip of Common as shown on the said plan and exclusively to use and enjoy and allow the use and enjoyment by all persons they respectively should think fit of the said roads and gates for the passing and repassing at all times and for all purposes and with or without carriages and animals to and from the said seven several plots of land messuages and offices aforesaid respectively.

NOTE: The road coloured brown referred to relating to the land tinted mauve is tinted brown on the title plan of AV35798.

4 (07.04.2009) The land is subject to the following rights reserved by a Conveyance of land adjoining the western boundary of 41 Durdham Park dated 2 June 1898 made between (1) Mortgagees Agency Limited (Vendors) and (2) The Mayor Alderman and Burgesses of Bristol (the Corporation):-

"Except and reserved unto the Vendors their successors and assigns and their tenants and the occupiers for the time being of the premises adjoining the plot of land thereby conveyed full and free liberty of ingress egress and regress way and passage through over and along those parts of the said plot of land thereby conveyed which lie between the dotted lines shown on the said plan the Vendors their successors and assigns paying a fair proportion of the expense of keeping the same in repair and that the said premises should for ever thereafter be used only as a road or street or public pleasure ground."

5 (07.04.2009) A Deed dated 25 September 1914 made between (1)George Walters Daubeny & others and (2)Sir Edward Burnett James relates to rights of access over land forming part of Durdham Downs.

NOTE: Copy Abstract filed under BL71082.

6 (07.04.2009) The land is subject to the following rights granted by a Conveyance of The St Monica Home and other land dated 29 September 1919 made between (1) William Herbert Ames and And Others and (2) Henry Vincent Wills :-

"Together with all commonable rights relating to the said hereditaments and particularly the right to depasture one hundred and twenty sheep on Durdham Down and Together also with all tithe rentcharge (if any) payable in respect of the said hereditaments."

7 (07.04.2009) The land is subject to the rights granted in a Conveyance of The Grange dated 24 June 1927 made between (1) Thomasina Prittie George (2) Christopher George, Edward Mortimer Harley and The Public Trustee and (3) The University Of Bristol.

NOTE 1:-Copy filed .

By the said deed the land was conveyed subject to the easements contained in a Conveyance dated 11 August 1921 details of which are set out in the Second Schedule of the above mentioned Conveyance.

NOTE 2: Neither the original Conveyance dated 11 August 1921 nor a certified copy or examined abstract thereof was produced on first registration.

8 (07.04.2009) The land is subject to the rights granted by a Deed dated 23 December 1948 made between (1) The Lord Mayor Aldermen and Burgesses of the City of Bristol and (2) His Majesty's Postmaster General.

NOTE: Copy filed under AV117508.

9 (07.04.2009) The land is subject to the rights granted in a Deed of Grant dated 23 January 1961 made between (1) Bristol Corporation and (2) Ronald Edwin Hurley.

NOTE: Copy filed.

C: Charges Register continued

10 (07.04.2009) The land is subject to the following rights reserved by a Conveyance of the land tinted pink on the title plan dated 14 May 1969 made between (1) The University of Bristol (The University) and (2) The Lord Mayor Aldermen and Burgesses of The City of Bristol (The Corporation):-

"Except nevertheless and reserving unto the University and all other persons now or hereafter lawfully entitled thereto the right o use for all proper and accustomed purposes the road or ways now or hereafter constructed over the said property and to use the sewers gas and water and other pipes and electrical conduits now or hereafter constructed thereunder Provided always that no right shall arise hereunder in the case of any such roads ways sewers gas and water and other pipes or electrical conduits coming into existence after the expiration of the period of Eighty years from the date hereof which shall be the perpetuity period applicable hereto"

11 (07.04.2009) The land is subject to the rights granted in a Deed dated 11 July 1974 made between (1) The City Council Of Bristol (2) John Kenneth Lewis (3) Brian Charles Tucker and Beatrice Margaret Tucker and (4) Lilian Clara Smith.

NOTE: Copy filed.

12 (07.04.2009) The land is subject to the following rights granted by a Deed dated 4 February 1985 made between (1) Bristol City Council (Council) and (2) University of Bristol:-

"The Council as Beneficial Owner hereby grants unto the University and its successors in title full right and liberty:-

(i) to enter onto the land shown edged red on the plan with or without workmen for the purposes of constructing accessways in the positions shown by black hatching on the said plan

To go pass and repass (in common with the Council and all other persons similarly entitled) at all times with or without vehicles over and along the said accessways shown hatched black for the purpose of gaining access to and egress from the blue land and Down House Cottage and for no 6ther purpose whatsoever Subject to the costs of maintaining and repairing the said accessways until such time as the same shall be dedicated to the public and be incorporated into the public highway

To enter onto the land edged red as aforesaid and to break open the surface thereof for the purpose of laying or constructing such pipes sewers or service cables as may be reasonably necessary for the benefit of the blue land together with the right of full free and uninterrupted passage of water soil gas and electricity through such pipes sewers and service cables together also with the right to enter upon the land edged red for the inspection maintenance and repair of the said pipes sewers and service cables making good nevertheless at its own expense all damage or disturbance which may be caused to the land edged red in the exercise of such rights."

NOTE 1: The land edged red on the Deed Plan is shown tinted pink on the title plan.

NOTE 2: The positions shown by black hatching on the Deed Plan are hatched blue on the title plan.

NOTE 3: The land in this title is part of the blue land referred to

13 (07.04.2009) The land is subject to the rights granted in a Deed dated 26 July 1988 made between (1) The City Council Of Bristol and (2) Orbit Housing Association.

NOTE: Copy filed.

14 (07.04.2009) By a Deed dated 6 November 1989 made between (1) Orbit Housing Association and (2) The City Council of Bristol the description of right and deed dated 21 February 1986 it is contained in referred to in the Property Register has been varied.

NOTE: Copy filed

C: Charges Register continued

15 (07.04.2009) The land is subject to the rights granted in a Deed of Easement dated 5 February 1993 made between (1) The City Council Of Bristol and (2) Benson Bros (Bristol) Limited.

NOTE: Copy filed.

16 (07.12.2011) The land is subject to the rights granted by a Deed dated 11 March 1993 made between (1) Benson Bros (Bristol) Limited and (2) Josephine Norma Weir.

NOTE: Copy filed under AV216760.

17 (23.04.2013) The land is subject to the rights granted by a Transfer of the Former Clifton District Office dated 21 March 2013 made between (1) The City Council of Bristol and (2) P G Enterprises Limited.

NOTE: Copy filed under AV36133.

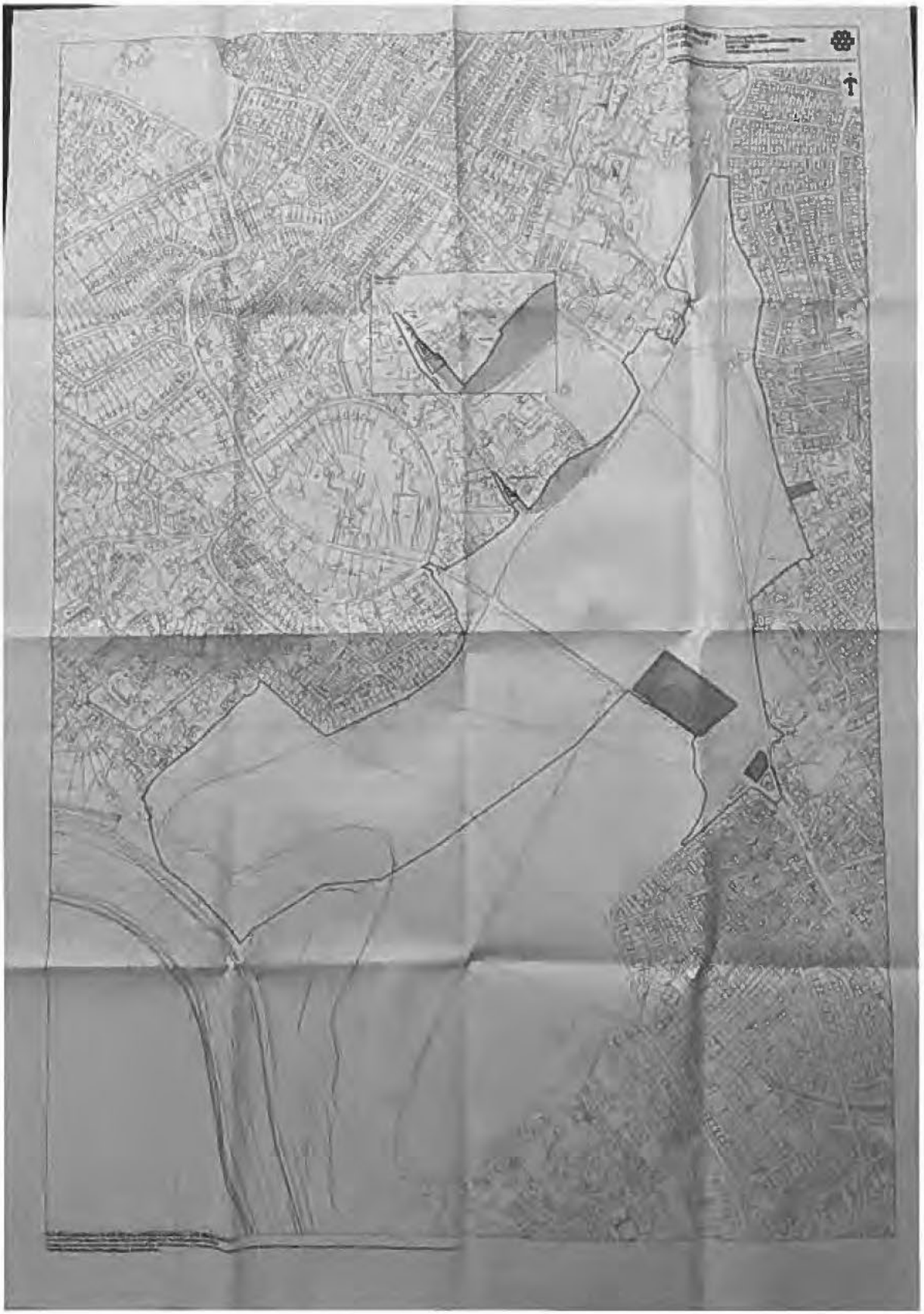
18 (06.01.2016) The land is subject to a right of way with or without vehicles over the road leading from Downs Edge into Hollybush Lane in favour of Downs Edge, Saville Road. The extent of this right have been aquired by prescription, may be limited by nature of the user from which it has arisen.

NOTE: Copy statement of truth dated 16 September 2015 made by Philippa Victoria Tasker filed under BL71082.

19 (02.06.2016) The land tinted brown on the title plan is subject to a right of way with or without vehicles in favour of Kenwith Lodge and Hampton Lodge. The extent of this right, having been acquired by prescription, may be limited by the nature of the user from which it has arisen.

NOTE: Copy of Statutory Declarations dated 14 April 2016 and 5 May 2016 made by Karen Horseman filed under BL74204.

End of register



On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE3

IN THE COUNTY COURT AT BRISTOL **CLAIM NO:**

BETWEEN:

BRISTOL CITY COUNCIL

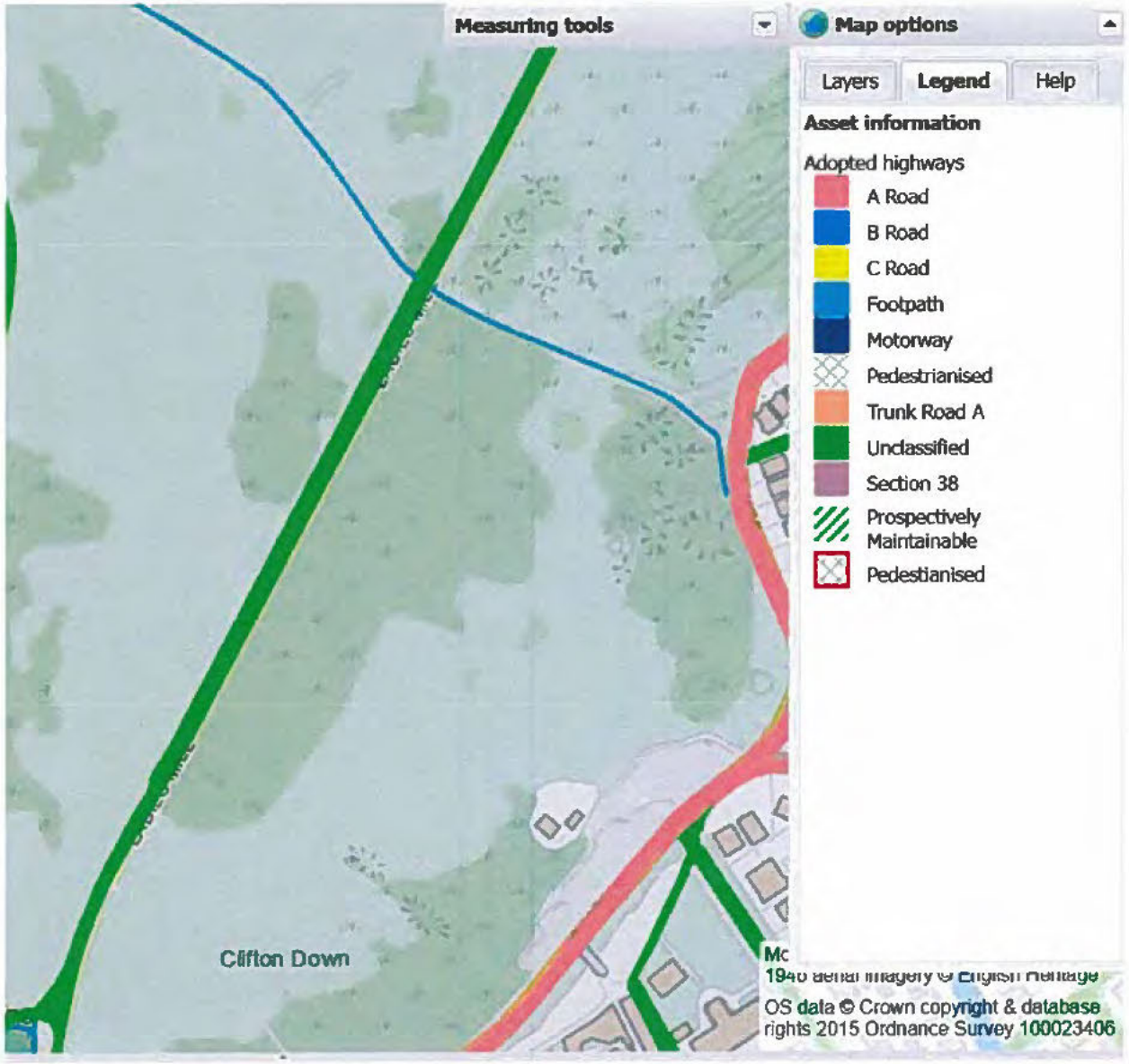
Claimant

and

PERSONS UNKNOWN

Defendant

EXHIBIT CE3


Measuring tools
Map options
Layers
Legend
Help
Asset information
Adopted highways
A Road
B Road
C Road
Footpath
Motorway
Pedestrianised
Trunk Road A
Unclassified
Section 38
Prospectively Maintainable
Pedestianised
Clifton Down
1946 aerial imagery © English Heritage
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On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE4

IN THE COUNTY COURT AT BRISTOL **CLAIM NO:**

BETWEEN:

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendant

EXHIBIT CE4

From: [redacted]
To:
Cc:
Subject: FW: The Downs Possession Order/Injunction [WBDUK-AC.FID103454656]
Date: 22 May 2025 13:37:49
Attachments: SignatureLogo_63cdb581-13c2-4631-94ea-9b042c8190fd.png
wbd_keyline_twitter-x_c10e3873-d1d2-49c6-a86e-b55304807a88.png
WBD_Email_KeyLine_LinkedInLogo_2019_ed441b28-0746-48f0-a9ec-756646ded617.png
Plan(180382341.1).pdf
Map of the Downs Act(179594066.1).pdf

You don't often get email from [redacted] Learn why this is important

[redacted]

Dear Caroline
Caroline Duckworth has passed this to me, as I am the Clerk to SMV as well as a solicitor.
We have in the past given a generic authority to BCC to act on SMV's behalf on any matters relating to the Downs.
I think this is all covered by the Clifton and Durdham Downs (Bristol) Act 1861, whereby SMV and BCC contributed Clifton Down and Durdham Down respectively to be managed by the Downs Committee for the benefit of the citizens of Bristol. In practice the combined area is managed by BCC on behalf of the Downs Committee.
However, insofar as necessary, I can confirm that SMV authorises BCC to act on its behalf in taking steps to safeguard Clifton Down by taking legal proceedings to seek possession of the area from those unlawfully occupying it and to prevent their return.
Attached is a plan showing my understanding of the extent of the whole of the Downs. The extent of Clifton Down is shown on the plan attached to the Downs Act, also attached, with Clifton Down being shown edged pink.
Title is unregistered and comprises a Feoffment dating from 1914, which is not easily copied but I would suggest that the recitals to the 1861 Act provide sufficient evidence of SMV's ownership.
Kind regards

[redacted]

[redacted]

[redacted]

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On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE5

IN THE COUNTY COURT AT BRISTOL **CLAIM NO:**

BETWEEN:

BRISTOL CITY COUNCIL

Claimant

and

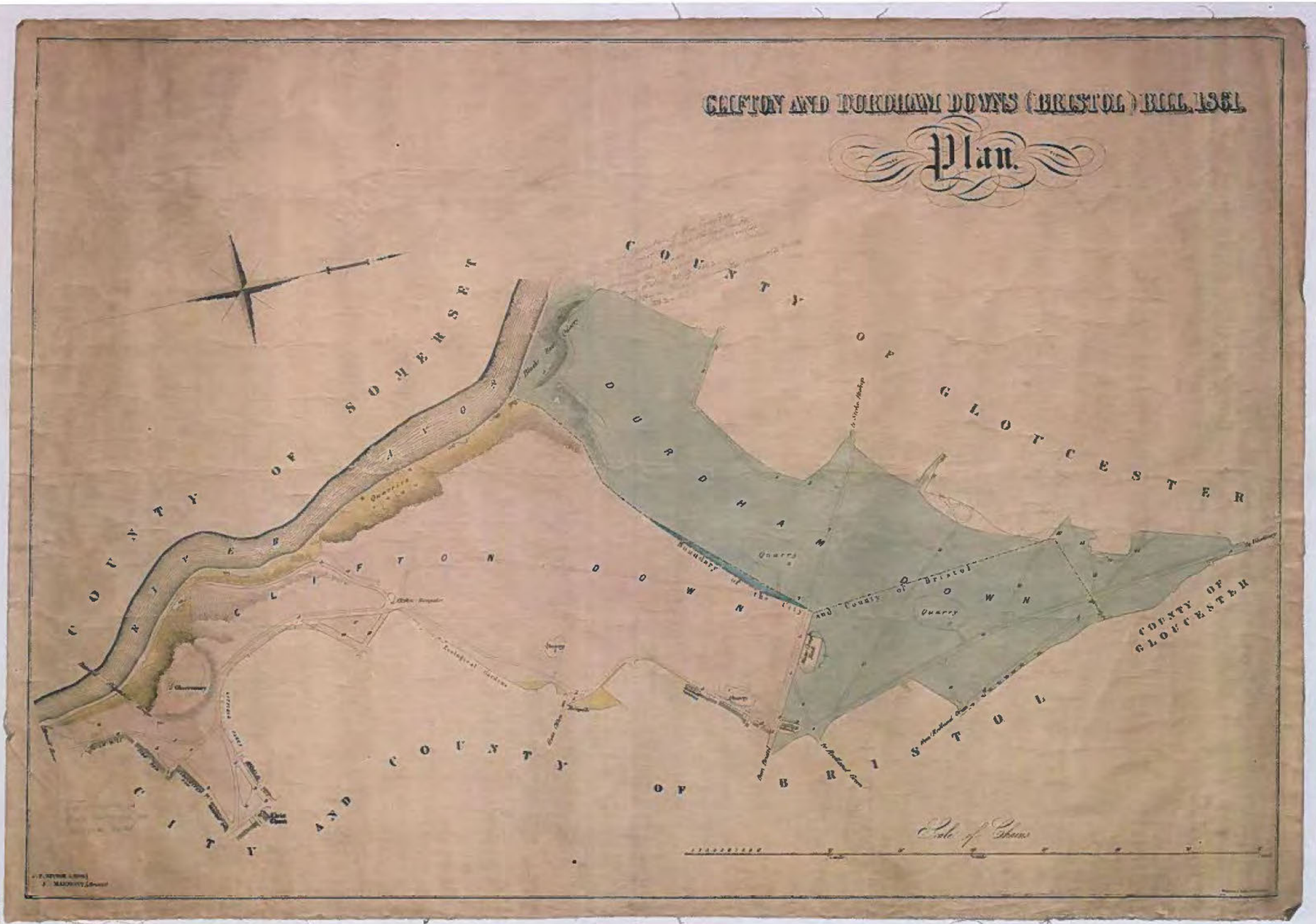
PERSONS UNKNOWN

Defendant

EXHIBIT CE5

CLIFTON AND DURDHAM DOWNS (BRISTOL) BILL 1861.

Plan.



C25

THE CLIFTON AND DURDHAM DOWNS (BRISTOL) ACT 1861

ARRANGEMENT OF SECTIONS

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As to purchase and regulation of Commonable Rights, etc	4
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Authenticated Bye-Laws to be evidence	6
Transient Offenders	7
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AN ACT

To enable the Corporation of the CITY of BRISTOL to purchase DURDHAM DOWN, and to secure DURDHAM DOWN and CLIFTON DOWN as places for public recreation.

[ROYAL ASSENT, 17 MAY 1861]

Whereas there are in the immediate neighbourhood of the City of Bristol Two Downs or Commons contiguous to one another and undivided, one of which Downs is entirely within the City and County of Bristol, and contains about Two hundred and thirty Acres, and is called Clifton Down; and the other of the said Downs is partly within the same City and County and partly in the county of Gloucester, and contains about Two hundred and twelve Acres, and is called Durdham Down; and both the same Downs have from time immemorial been open and largely resorted to as Places of Recreation for the Inhabitants of Bristol and its Neighbourhood, and it is expedient that they should be so maintained: And whereas the Master, Wardens and Commonalty of the Society of Merchant Venturers of the City of Bristol (who are herein called the Society) are, or claim to be, Lords of the Manor of Clifton in the said City and County of Bristol, and to be entitled to the Fee Simple and Inheritance of the Common and Waste Lands within the said Manor, subject only to such commonable and other Rights, Roads, Ways, and Easements as belong to the Freeholders of the said Manor of Clifton and others, in, over, and upon the said Common and Waste Lands: And whereas the Society have agreed with the Mayor, Aldermen, and Burgesses of the City of Bristol, hereinafter called the Corporation, that when the Corporation shall have acquired Durdham Down, in pursuance of the Provisions of this Act, such Parts of the Common and Waste Lands of the said Manor of Clifton as are coloured Pink in the Plan hereafter referred to shall be Regulated and Governed by the Rules and Byelaws hereinafter provided for, and shall for ever thereafter be kept open and unenclosed as a Place of public Resort for the Citizens and Inhabitants of Bristol, subject, however, to the commonable and other Rights (if any) of the Freeholders of the said Manor and others, in, over, and upon the same Lands, and to the Provisions hereinafter contained, and the Society have further agreed that the Workings of the present and all future Quarries on the Parts of Clifton Down coloured Yellow on the said plan shall be subject to the Rules and Byelaws hereinafter provided for: And, whereas Sir John Henry Greville Smyth of Ashton Court in the county of Somerset, Baronet, (as to Three undivided Fourth parts) and Marianne Colston of Roundway Park in the county of Wilts, Widow, and the reverend Richard Symes, Clerk, and Charles Edward Murray Esquire, her trustees, (as to the remaining Fourth Part) are or claim to be Lords of the Manor and Hundred of Henbury, partly in the County of Gloucester and partly in the said City and County of Bristol, and to be entitled to dispose of the Fee Simple and Inheritance of the Common and Waste Lands (whereof Durdham Down forms part) within the said Manor and Hundred of Henbury, subject to such Commonable and other Rights, Roads, Ways, and Easements therein as belong to the Freeholders of the said Manor and Hundred and others, and by a Contract dated the Second Day of August One thousand eight hundred and sixty, and made between the said Sir John Henry Greville Smyth of the First Part, the said Richard Symes and Charles Edward Murray of the Second Part, the said Marianne Colston of the Third Part and the said Mayor, Aldermen and Burgesses of the Fourth Part, the said Sir John Henry Greville Smyth as to Three equal undivided Fourth parts, and the said Richard Symes and Charles Edward Murray, with the Consent of the said Marianne Colston (testified by her being a Party to and executing the Contract now in recital), as to the remaining equal undivided Fourth Part, agreed to sell, and the said Mayor, Aldermen, and Burgesses agreed to purchase, for the

sum of Fifteen Thousand Pounds, the Fee Simple of all that Part situate partly in the City and County of Bristol and County of Gloucester which was delineated in the Plan annexed to the Contract now in recital, and was therein coloured Green of the Waste or Common of the manor and Hundred of Henbury in the County of Gloucester, called Durdham Down, and of the Quarries and Roads and Ways shown on the same Plan as situate or lying within the Limits of the said Part so coloured Green on the said Plan of the said Common, and all the Estate and Interest (if any) of them the said Sir John Henry Greville Smyth, Richard Symes, and Charles Edward Murray of and in so much of the said Waste or Common as was coloured Blue in the said Plan, subject to all Rights of Common of every Kind over the said Common of the Freeholders of the said Manor and Hundred, and to all public and private Rights of Way over the said Roads and Ways respectively, and to all Rights and Interests (if any) whatever the same might be, subsisting upon, in, or over the said Part thereby agreed to be sold and purchased as aforesaid of the said Common; but the Title of the Vendors to the Black Rock Quarry or some Part thereof, or the adjacent Land, being disputed by a Person claiming by adverse Possession, the Limit or Boundary on the Side of the said Black Rock Quarry of the said Land thereby agreed to be sold and purchased was to be determined by and at the Risk and Expense of the Said Mayor, Alderman, and Burgesses, and no Abatement of Purchase Money or Compensation was to be made either in respect thereof or of any Inaccuracy or Mistake in the said Plan in any other Part or Particular; and by the Contract now in recital it was (amongst other things) further provided, that the Purchasers should, at their own Expense, before the Twenty-fourth Day of December One Thousand Eight hundred and Sixty One, obtain or use their best Endeavour to obtain an Act of Parliament, in terms to be approved of by the Vendors, to enable them to purchase and hold the said Land thereby agreed to be sold and purchased, and to render it Imperative on them forever to keep the whole of the said purchased Land uninclosed as a Place of Public Resort and Recreation, subject only to such Rules, Orders, Byelaws, Conditions, and Restrictions as might from Time to Time be deemed expedient and might be made by the said Mayor, Aldermen, and Burgesses for the Improvement and Preservation of the said Land, and for best ensuring the public Use and Enjoyment thereof:

And whereas Plans of the said Downs have been deposited with the Clerks of the Peace for Gloucestershire and for the city and county of Bristol respectively, on which Plans Clifton Down is coloured pink and yellow, and so much of Durdham Down as forms the Subject of the said Contract is coloured Green and Blue; and Books of Reference containing the names of the Lords of the said Manors and of the Commoners thereof, (so far as they can be ascertained), and of the Owners, Lessees, and Occupiers of Property in the said Downs as so coloured have been deposited with the said Plans:

And whereas such Part of Durdham Down as coloured Blue in the said Plan is also claimed by the Society as being part of the Manor of Clifton:

And whereas it is expedient that the aforesaid Agreement with the Society as respects Clifton Down should be carried into effect, and that the Corporation should be authorised to fulfil their contract for the purchase of Durdham Down, and should be enabled, with the consent of the Commoners or others interested therein, to purchase or to regulate the exercise of all commonable rights or other rights which may interfere with the enjoyment of either of the said Downs by the public; and that the Corporation and Society should participate in the management of both the said Downs; and that such part of Durdham Down as is now situated within the county of Gloucester should be henceforth deemed, for the purpose of police, to be within the city and county of Bristol, and should be subject to the jurisdiction of the Justices of the Peace for the same city and county:

But inasmuch as these objects cannot be attained without the authority of Parliament:

MAY IT PLEASE YOUR MAJESTY,

That it may be enacted; AND BE IT ENACTED, by the QUEEN'S MOST EXCELLENT MAJESTY, by and with the advice and consent of the Lords Spiritual and Temporal and Commons in this present Parliament assembled, and by the authority of the same as follows:

I Such part of Clifton Down as is coloured pink in the said Plan, so deposited as aforesaid, together with such part of Durdham Down as is coloured blue in the said Plan, shall, so soon as Durdham Down shall be vested in the Corporation, be managed and regulated as hereinafter provided, and shall for ever hereafter remain open and unenclosed, and as a place for the public resort and recreation of the citizens and inhabitants of Bristol, subject however to the commonable and other rights (if any) of the freeholders of the said manor of Clifton and others in, over, or upon the said Down, and to the right of quarrying hereinafter reserved.

II It shall be lawful for the Corporation to fulfil the hereinbefore recited Contract of the second day of August, one thousand eight hundred and sixty; and upon the execution by all proper parties of a Deed of Conveyance duly stamped, and upon payment of the purchase-money of fifteen thousand pounds in the said Contract mentioned, and the fulfilment of the other conditions and considerations to be performed on the part of the Corporation, all the estate and interest of the said Lords in such part of Durdham Down as is coloured green on the said Plan, and of the quarries, roads, and ways shown in the same Plan, and of and in and to so much of the said Down as is coloured Blue on the said Plan, shall thenceforth vest in the Corporation in as full and ample a manner as such estate and interest have heretofore been vested in the Vendors; subject however to all rights of common of every kind over the said Down of the Freeholders of the Manor and Hundred of Henbury, and also to all public and private rights of way over the said roads and ways, and to all rights of persons (claiming under the said Vendors or by statute) to the quarries in the said Down, and to all other rights of common, way, and water, and other easements subsisting at the time of the said purchase: Provided always, That, subject to such rights as aforesaid, the whole of the said Down shall for ever hereafter be kept open and unenclosed by the Corporation during their estate and interest therein as a place of public resort and recreation, and be managed and regulated as hereinafter provided.

III It shall be lawful for the Corporation, with the consent of the Commoners or other parties who may be interested therein, to purchase all commonable rights and all other rights over or upon either of the said Downs which may, in the opinion of the Joint Committee hereinafter mentioned, interfere with the enjoyment of the said Down by the public; and from time to time, with such consent as aforesaid, to regulate the exercise of all such rights.

IV Nothing herein contained shall prevent, nor shall any Bye-Law or regulation hereafter made (unless by common consent of the Corporation and Society) prevent, the Society from continuing to work for the benefit of themselves and their successors, their lessees or tenants, the existing Quarries by the banks of the River Avon, or any other Quarries within the limits of the parts of Clifton Down coloured yellow on the Plan deposited as

aforesaid, from working for the benefit of themselves and their successors, their lessees or tenants, the Quarries by the side of the said River, shown on the said Plan as the 'Black Rock Quarry;' but the working of all such Quarries shall be subject to the reasonable Rules and Bye-Laws to be made in the manner hereinafter prescribed; and it shall not be lawful either for the Corporation or the Society, after the passing of this Act, to open or work any new Quarry upon the surface of Clifton Down, other than in the part coloured yellow in the said Plan, unless with the consent of the Joint-Committee hereinafter mentioned, and subject to the said Rules and Bye-Laws; and it shall not be lawful for the Corporation to open or work any new Quarry upon the surface of Durdham Down.

V It shall be lawful for the Corporation acting by the Council of the said city, after Durdham Down shall be so vested in the Corporation as aforesaid, and they are hereby authorised and required, to make such Rules and Bye-Laws as they shall think proper, and from time to time to alter or amend the same, for regulating, improving, and preserving Durdham Down and the portion of Clifton Down coloured pink in the said Plan, for enforcing such orders as the Joint Committee hereinafter mentioned may make in pursuance of this Act, and for directing in what manner the Quarries by the side of the River Avon, and such surface Quarries as are now open of the said Downs, or shall be hereafter opened on Clifton Down, shall be respectively worked (subject however as to such surface Quarries to the statutable rights of the Trustees of the Turnpike Roads, Local Board of Health, or the Surveyors of Highways, or other persons, to use of work the same); and all persons who shall come to or resort to the said Downs, or who shall be entitled to use any such Quarries as last-mentioned shall, and they are hereby required to observe and keep such Rules and Bye-Laws under such penalties and forfeitures as shall be respectively fixed for the breaking or non-performance of the same: Provided, nevertheless, That no such Rule or Bye-Law shall be made, altered, or amended, or shall have any force or effect, until the same shall have been approved by the Society, and their approval thereof signified by writing under their corporate seal, to be affixed to the said Rules and Bye-Laws: And provided also, That the 90th Section of the 'Act to provide for the regulation of Municipal Corporations in England and Wales' shall apply to such Rules or Bye-Laws.

VI In all cases of prosecution against any person who shall violate any Rule or Bye-Law as aforesaid, the production of a written or printed paper, or parchment, purporting to be a true copy of the said Rules or Bye-Laws, and authenticated by having the seal of the Corporation affixed thereto, shall be evidence of the existence and of the due making of such Rules and Bye-Laws.

VII It shall be lawful for any constable of the said city and county, and all persons called by him to his assistance, to seize and detain any person who shall have committed any offence against any Rule or Bye-Law to be made under this Act, and whose name and place of residence shall be unknown to such constable, and to convey such offender with all convenient despatch before two Justices of the Peace for the said city and county without any warrant or authority other than this Act, and such Justices shall proceed with all convenient despatch to the hearing and determining of the complaint against the offender.

VIII All penalties and forfeitures which shall have been incurred by any person for any offence committed against any such rule or Bye-Law, shall be recovered before two Justices of the Peace for the said city and county of Bristol in manner directed by an Act passed in the Session of the eleventh and twelfth years of the reign of Her Present Majesty, chapter forty-three, entitled, 'An Act to facilitate the performance of the Duties of Justices of the Peace out of Sessions within England and Wales, with respect to summary Convictions and Orders' or of any Act or Acts which may be hereafter passed to amend or alter the same.

IX No person shall be disqualified from acting as a Justice of the Peace in any matter relating to the execution of this Act, or to any such Rule or Bye-Law, by reason of paying, or being charged with, or being liable to pay any Municipal or Borough rate within the said city and county, or by being a member of the Council of the said city or holding office under them.

X It shall be lawful for the Corporation and the Society, as soon as conveniently may be, after Durdham Down shall be so vested in the Corporation, and they are hereby required, to nominate a Joint Committee for the management of both the said Downs, which Committee shall be called 'The Downs Committee', and shall consist of the Mayor and six Members of the Council of the said city to be elected by the said Council, and of the Master and six Members of the Society to be elected by the said Society, and five shall be a quorum of the Committee; and such Committee shall continue in office until the ninth day of November next ensuing the date of its appointment, and also in the then next ensuing and every succeeding year, or as soon as conveniently may be after those respective days, shall and they are hereby required to nominate and choose another Joint Committee to be constituted as aforesaid in the place and stead of the Committee which shall have then previously gone out of office; and the members of every such Committee shall remain in office for one year from the time of their appointment, and two of the members nominated by the Corporation and two of the members nominated by the Society shall not be capable of re-election; and all questions before the same Committee shall be determined by a majority of the votes of the members present thereat; and the Mayor of the said city shall when present be Chairman of the Committee, or in his absence the Master of the Society shall be Chairman, and in the absence of both these persons the members of the Committee present shall choose a Chairman; and the first meeting of the Committee shall be held on such day within one month after their first appointment, and at such place as the said Mayor and Master shall appoint.

XI It shall be lawful for the Downs Committee from time to time to exercise the following powers with respect to the said Downs, and make all necessary orders for carrying the same into effect:

They may from time to time suggest, for the approval of the Corporation and Society respectively, such Rules and Bye-laws as they may deem expedient for carrying this Act into execution; and they shall carry into effect such Rules and Bye-laws as shall be made:

They may open new roads in or over the said Downs, and from time to time may close the same, and they may close or divert any of the existing roads or ways, subject, however, as to any such last-mentioned roads or ways to any rights of way which may exist therein:

They may prevent all obstructions and nuisances, and from time to time remove any encroachments on the said Downs; they may erect thereon temporary fences for improving and preserving the turf and preventing injury thereto by carriages or horses, and may from time to time direct what parts of the said Downs shall or shall not be used by carriages and horses:

They may drain, plant or improve the said Downs, may inclose parts thereof for ornamental purposes only, and may appropriate portions thereof for particular purposes of recreation or exercise:

They may agree with the Trustees of any turnpike-roads, or the Surveyors of any public highway, or with any Local Board of Health, or other person having the custody and control of such highway, with respect to the exercise by such persons or Board respectively of such rights as they may respectively possess of quarrying in the said Downs; and they may fix the spot whereon and the manner in which any such Trustees, Surveyors, Local Board of Health, or other persons as aforesaid, shall exercise the right of quarrying in the said Downs: Provided always, That whensoever any difference shall arise between the Downs Committee and such Trustees, Surveyors, Local Board, or other persons, as to the fitness of the spot or the restrictions proposed in the manner of quarrying, such difference shall be settled by the arbitration of some person, to be appointed by the Recorder for the time being of the City of Bristol, and the decision of such person shall be final:

They shall be empowered to close and fill up any of the existing surface quarries on either of the said Downs, and on Clifton Down again to open the same, or any fresh surface quarries (subject, however, as to any existing quarry, to any statutable right to use the same which may be possessed by any such Trustees, Local Board, Surveyors, or other persons as aforesaid):

They may make rules for the conduct of their own business and may appoint and remove clerks and servants, and also officers and workmen for the purposes of this Act, and they may fix the remuneration of the persons so to be employed by them:

They shall, at two convenient times in every year, to be fixed by the said Council, make an estimate of the expense to be incurred in carrying this Act into execution during the period mentioned in the said estimate, not exceeding in any one year the sum of three hundred pounds; and they shall by requisition under the hands of the said Mayor and Master, addressed to the Treasurer of the said City, demand the payment of the sums mentioned in the requisition, and at the times therein mentioned; and the said treasurer, within three months from the date of such requisition, and at the times therein mentioned; and the said Treasurer, within three months from the date of such requisition, out of any moneys which may then be in his hands on account of the Borough Fund of the said City, shall pay the said sums to such persons and at such times as shall be appointed by the said requisition:

They shall cause entries or minutes, as the case may be, of all their orders or proceedings to be entered in a book or books, to be kept by them for such purpose, which book or books shall be open at all reasonable times for the inspection of any Member of the Council or Society respectively, without payment of any fee; and such entries or minutes shall be signed by the Chairman of the Meeting at which such orders and proceedings were made; and such entries or minutes, when so signed, shall be received as prima facie evidence of all such orders and proceedings in all Courts and places, and before all Judges, Justices, and others whomsoever:

They shall report their proceedings yearly to the Council and Society respectively.

XII Excepting as is by this Act expressly provided, nothing in this Act contained shall alter or impair the estate, right, title, powers, or privileges of the Society or their Trustees in or over the Manor of Clifton, or in or over Clifton Down, as part of the common and waste lands of the same Manor; but all such estate, right, title, powers, and privileges shall (except as aforesaid) remain as valid and effectual as though this Act had not passed; not shall anything herein contained affect or prejudice any contract or agreement heretofore entered into by the Society or their Trustees with any other persons for the use or occupation of any part of Clifton Down, or for any right or easement in or over the same.

XIII So soon as Durdham Down shall be vested as aforesaid in the Corporation, that part of the said Down which is now situated within the county of Gloucester shall, for all purposes of police, be deemed to be part of the City and County of Bristol, and the Justices of the Peace and constables for the same city and county shall have the same authority and jurisdiction in and over the said part of the said Down as they may now lawfully exercise within the other parts of the said city and county.

XIV Within two months after the passing of the Act there shall be deposited with the Town Clerk of the City of Bristol, in the Council House of the same city, a copy of the Plan so deposited as aforesaid, which Plan shall be authenticated by the corporate seal of the Corporation and by the common seal of the Society; and another copy of the same Plan, authenticated in like manner, shall be deposited with the Treasurer of the Society at the Hall of the same Society; and the said Plans shall be preserved among the deeds and muniments of the Corporation and Society respectively; and the Plan deposited in the Council House, or a copy thereof so authenticated, shall be open at all reasonable times for the inspection of any person concerned therein on payment of the fee of one shilling; and the copy so deposited in the Hall of the Society shall be open at all reasonable times for the inspection of any member of the Society without payment.

XV The expense of obtaining this Act, of the purchase of Durdham Down and of any commonable or other rights as aforesaid and of laying out the said Downs for the Public, of forming, diverting, or closing roads, and of protecting, closing or filling up surface quarries, shall be defrayed from time to time by the Corporation out of the Borough Fund of the said city and county in manner hereinafter provided for that purpose.

XVI It shall be lawful for the Corporation acting by the said Council, from time to time to borrow and take up mortgage of the Borough Rates or Fund, or other property of the said city, all or any part of the money which shall be required for defraying such expense as aforesaid, not exceeding in the whole the sum of twenty thousand pounds; and such money may be so raised at any rate of interest not exceeding five pounds per centum per annum, and every such mortgage may be made by an instrument in the form contained in the Schedule hereunto annexed, or to that or the like effect, and shall be executed by affixing thereto the corporate seal of the said city and county, and every such mortgage shall be effectual for securing to the person advancing the sum of money in such mortgage expressed to be advanced, his executors, administrators, or assigns, the repayment thereof with interest for the same after such rate and at such time and in such manner as shall be provided in such mortgage; and the said mortgages shall be numbered in the order of succession in which they are granted, and copies or extracts of all such mortgages shall be kept by the Treasurer of the said city in a book to be provided for that purpose; and the persons to whom such mortgages or any transfers thereof shall be made, their executors and administrators, shall be creditors upon the Borough Rates or Fund, or other property of the said city thereby

expressed to be mortgaged in an equal degree one with another, and shall not have any preference or priority other than is provided under the powers of this Act.

XVII The said Council shall in every year charge the Borough Rates or Fund of the said city with the sum for the time being required to pay the interest of any money borrowed on any mortgages under this Act, or such of them as for the time being shall remain unpaid; and also, with the payment of a further sum not less than one-thirtieth part of the whole of such mortgages at the time of the same being first made; and such sum shall be applied, under the direction of the said Council, in discharge of the interest of the said mortgages or such of them as for the time being shall remain unpaid, and of so many of the principle sums owing on the said mortgages for the time being remaining unpaid, as such sums after the payment of the interest as aforesaid will extend to discharge, until the whole of the principal moneys for which such mortgages shall have been made and the interest thereof shall be fully paid and discharged; and the said council is hereby required to fix one or more days in each year on which such payments shall be made, and shall make orders for assessment in due time so as to provide for such payments being regularly made; and the said Council shall by agreement with the said parties or others advancing any money for the purposes of this Act determine the order, or priority, or the time in which the several sums advanced shall bee respectively discharged; and the Treasurer of the said city shall keep an exact and regular account of all receipts and payments in respect of all principal moneys borrowed or taken up as aforesaid under this Act, and the interest thereof, in a book or books to be kept for that purpose; and the said book or books duly adjusted and settled up to the time being, shall deliver annually to the said Council at such time as they shall appoint; and such Council is hereby required carefully to inspect all such accounts, and to make such orders for carrying the several purposes aforesaid into execution as shall be deemed meet and necessary.

XVIII Provided always, That the said Council shall make provision by the ways and means aforesaid, and by the orders and directions which they are hereby authorised to give, that the whole of the principal money to be borrowed under the authority of this Act, and all interest for the same shall be fully paid and discharged within a time to be limited by such Council, not exceeding thirty years from the time of borrowing the same.

XIX No person lending money to the said Council, and taking a Mortgage for securing repayment of the same, executed in manner directed by this Act, and purporting to be made under the authority of this Act, shall be bound to require proof that the several provisions of this Act have been duly complied with; and if the said Council shall have executed a Mortgage under this Act, then such Council shall be deemed to have had full powers to levy the rates so mortgaged as aforesaid for repayment of the money so borrowed with interest, notwithstanding any of the provisions of this Act may not have been complied with; and it shall not be competent for any ratepayer or other person to question the validity of any such rates or mortgage on the ground that such provisions had not been complied with.

XX Provided also, That in every case in which any moneys shall have been borrowed under the powers of this Act, it shall be lawful for the said Council to pay off the moneys so borrowed, and to raise and borrow the moneys necessary for that purpose , and also to repay the said last-mentioned moneys and the interest thereof under the powers of this Act, as if such moneys were borrowed under the powers firstly hereinbefore contained; but so, nevertheless, that all moneys borrowed shall be discharged within thirty years from the time of first borrowing the same.

XXI This Act may be cited as 'The Clifton and Durdham Downs (Bristol) Act, 1861.'

On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE6

IN THE COUNTY COURT AT BRISTOL **CLAIM NO:**

BETWEEN:

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendant

EXHIBIT CE6


CHURCH
STOKE HILL
Durdham Down
Severn Sisters
Durdham Down and
Sneyd Park
JULIAN ROAD
STOKE ROAD
DOWNLEAZE
ROCKLEAZE
CIRCULAR ROAD
LADIES MILE
Durdham Down and
Sea Walls
Black
A4
The Gulley
A4176
LADIES MILE
PEMBROKE
Clifton Down
0
0.1
0.2km

On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE7

IN THE COUNTY COURT AT BRISTOL **CLAIM NO:**

BETWEEN:

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendant

EXHIBIT CE7

Order for possession

In the County Court at Bristol	
Claim Number	M00BS793
Claimant (including ref.)	Bristol City Council
Defendant (including ref.)	Persons Unknown
Date	17 June 2025

Bristol City Council Legal Services
Bristol City Council
City Hall
College Green
Po Box 3399
Bristol
BS1 9NE

THE COUNTY COURT

ON THE 17 June 2025, District Judge Napier

sitting at the County Court at Bristol, Bristol Civil Justice Centre, Number 2, Redcliff Street, Bristol, BS1 6GR

UPON hearing the Solicitor for the Claimant and the Defendants not attending.
AND UPON the Court reading the witness statement of Thomas Marshall and being satisfied that the Defendants were properly served with the possession papers and were made aware of the today's hearing under the provisions of CPR 55.6
AND UPON reading the witness statement of Caroline Ennion and the exhibits thereto.
AND UPON the Court considering the Clifton and Durdham Downs (Bristol) Act 1861 ("the Act").
AND UPON the Court being satisfied the Claimant and the Society of Merchant Venturers are the owners of the land of which possession is sought and the immediate right of possession
AND UPON the Court noting the permission granted by the Society to the Claimant to take these proceedings on their behalf, and the wider terms for the governance of the Clifton and Durdham Downs under the terms of the Act
AND UPON the Court finding that no licence or consent to occupy the land has been granted to the Defendants

and the court orders that

To the defendant

The court has **ordered you to leave** the property by the date stated in paragraph 1 above.

If you do not do so, the claimant can ask the court, without a further hearing, to authorise a bailiff or High Court Enforcement Officer to evict you. (In that case, you can apply to the court to stay the eviction, a judge will decide if there are grounds for doing so.)

Bristol City Council Legal Services
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City Hall
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BS1 9NE

1. Pursuant to CPR 19.3(1), the Society of Merchant Venturers does not need to be joined to this claim.

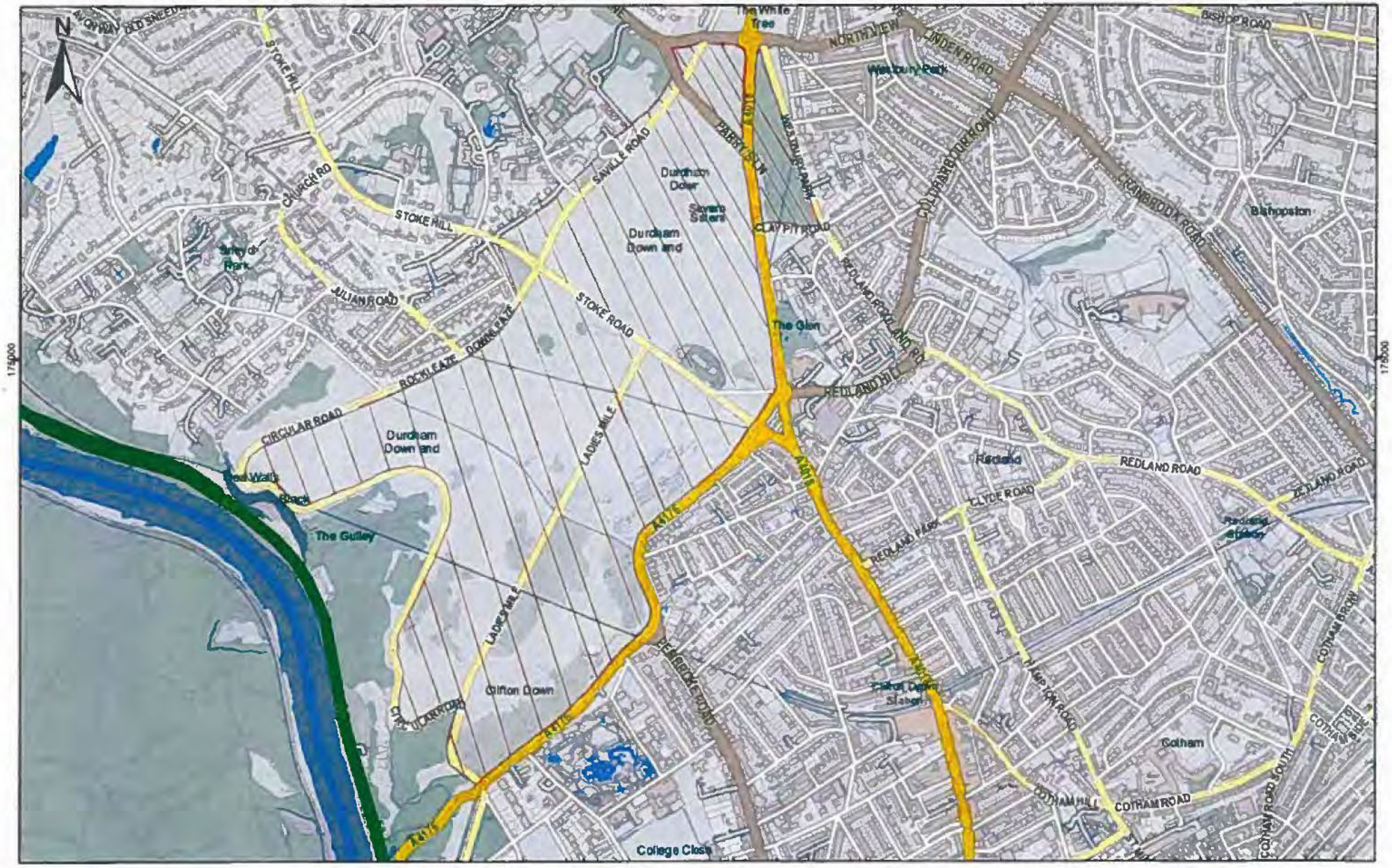
2. The Defendants do give the Claimant possession of Durdham Downs, Clifton Downs, and Ladies Mile as edged and hatched red on the plan attached forthwith.

3. The claim is transferred to the High Court of Justice for enforcement purposes.

4. No order as to costs

Downs travellers map

Date: 06/06/2025



150 75 0 150 300 450 600 m

1:12,000

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C41

On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE8

IN THE COUNTY COURT AT BRISTOL

CLAIM NO:

BETWEEN:

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendant

EXHIBIT CE8


STOKE ROAD
DOWNLEAZE
ROCKLEAZE
CIRCULAR ROAD
Durdham
Down and
LADIES MILE
The Glen
A4018
A4176
Black
The Gulley
A4
LADIES MILE
CIRCULAR ROAD
Clifton Down
A4176
PEMBROKE ROAD
0
0.1
0.2km

On behalf of: Claimant
Witness: C.Ennion
Statement: 1st
Exhibit: CE9

IN THE COUNTY COURT AT BRISTOL CLAIM NO:

BETWEEN:

BRISTOL CITY COUNCIL

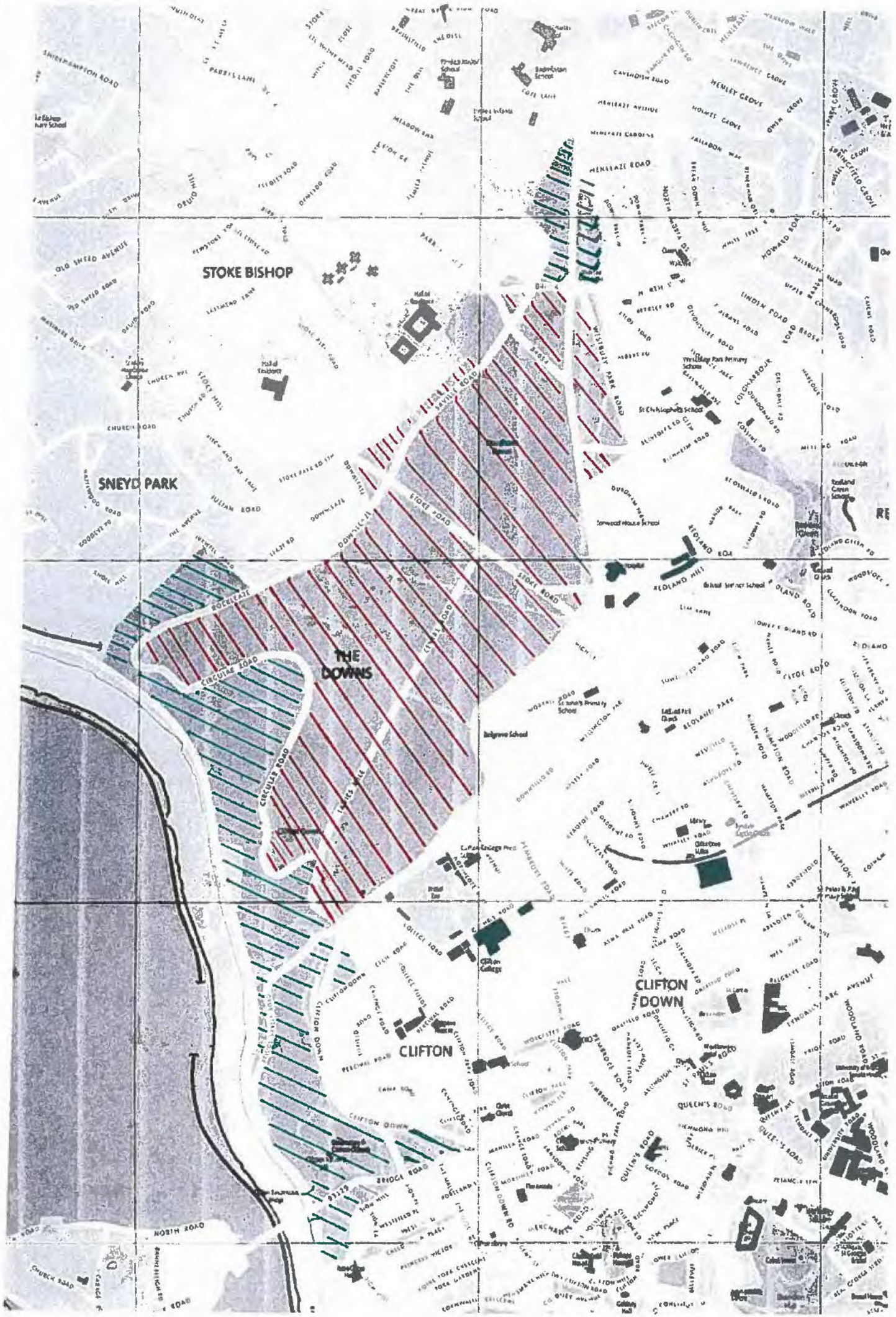
Claimant

and

PERSONS UNKNOWN

Defendant

EXHIBIT CE9


STOKE BISHOP
SNEYD PARK
THE DOWNS
CLIFTON
CLIFTON DOWN
CIRCULAR ROAD
STOKE ROAD
DOWNS LEA
HOWARD ROAD
HENLEAZE ROAD
WESTBURY PARK ROAD
REDLAND HILL
REDLAND ROAD
QUEEN'S ROAD
WHITELADIES ROAD
BRIDGE ROAD
CLIFTON DOWN ROAD
CHURCH ROAD
SHIREHAMPTON ROAD
PARRYS LANE
CAVENDISH ROAD
HENLEY GROVE
HOLMES GROVE
OWEN GROVE
ASHCOMBE GROVE
OLD SNEED AVENUE
DEVON ROAD
STOKES HILL
CHURCH RD
JULIAN ROAD
DOWNLEAZE
ROCKLEAZE
LINDEN ROAD
CAMBRIDGE ROAD
CANNOCK ROAD
WESTBURY PARK
ST CHRISTOPHER'S SCHOOL
REDLAND GREEN SCHOOL
REDLAND GREEN ROAD
WOODLAND ROAD
WAVERLEY ROAD
HAMPTON ROAD
WOODFIELD ROAD
ST JOHN'S ROAD
ST PAUL'S ROAD
ST MICHAEL'S HILL
BELGRAVE ROAD
TYNDALL'S PARK
ST MARY'S ROAD
ALMA VALE ROAD
ALEXANDRA ROAD
PERCEVAL ROAD
CLIFTON PARK
CLIFTON ROAD
CHANDOS ROAD
RICHMOND HILL
RICHMOND ROAD
ST PAUL'S
ST MARY REDCLIFFE
Redland Green School
Redland High School
Bishop Road Primary School
Bishop Road Infants School
Badminton School
Cotham School
Belgrave School
Clifton College
Clifton High School
Clifton Park School
Queen Elizabeth Hospital
Cotham College Prep
Lawrence House School
Redland Park Clinic
Redland Park Lodge
Clifton Suspension Bridge
Observatory
Hall
Hall Tennis
Hall Tennis Courts
Clifton Hill House
Clifton Hill House Hotel
Clifton Down Shopping Centre
Clifton Down Station
Clifton Hill
Clifton Wood
Clifton Wood Station

On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE1-CE8
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER:**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

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

Defendants

SECOND WITNESS STATEMENT OF CAROLINE ENNION

I, Caroline Ennion of Bristol City Council, Parks Team will say as follows:

1. I am employed by the Claimant, Bristol City Council, as a Parks Area Manager and am duly authorised to make this witness statement.

2. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

3. This is my second witness statement in this matter, and I make this further statement in support of the Claimant's application for an Injunction in relation to

Durdham Down, Clifton Down and Ladies Mile ('The Downs'). I detail below the reasons why the Claimant seeks Injunctive relief in the form of a Newcomer Injunction.

4. I have already discussed the distinctions between the various groups of unauthorised encampments on the Downs, and the reasons for the Claimant's approach in this litigation in terms of who the Defendants are and where they are located. This has meant that the Claimant recent proceedings have included actions on three particular locations on the Downs for all unauthorised encampments on these encampments. These have included to date Gyspy Roma Travellers ('Travellers'), vehicle dwellers and tents.

5. The land subject to this injunction is shown on the map hatched in green and red. **Exhibit CE1.**

6. As detailed in my first witness statement The Downs is regularly occupied by substantial numbers of travellers every year, starting in about April and finishing in October. The travellers occupy different areas of The Downs which greatly impacts on the Claimant, park users and local residents. There have been 6 separate traveller encampments this year alone on The Downs.

7. The vehicle dwellers occupy the roads of The Downs and their numbers have been gradually increasing to approximately 140 dwelt in vehicles parked on the highways of The Downs at present.

8. The Claimant was granted Orders for Possession on 17.06.2025 (concerning the red land) and on 27.06.2025 concerning (the green land). The Claimant obtained Writs of Possession from the High Court concerning these areas of land and on 01.07.2025, the Writs were enforced by an enforcement company and possession of the grassed areas (Durdham Down and Clifton Down) and Ladies Mile were returned to the Claimant. These Orders include all unauthorised encampments, comprising travellers and tents on the grassed areas and vehicle dwellers on Ladies Mile.

9. On 2nd June 2025 the Council were also granted an Order of Possession and

injunction against an individual living in a tented encampment on The Downs and causing anti-social behaviour which included shouting abuse, intimidating and confrontational behaviour and loud music here and in other green spaces in the city. He has moved following service of the Injunction.

The problems caused by trespasses

10. The continued trespass onto The Downs creates not only health and safety hazards, but extensive work and costs for the Claimant and frustration for many parks users and residents as detailed below.

10.1. Cleansing. The costs in relation to cleaning and disposing of waste material on The Downs this year after the travellers' visits including the eviction on 01.07.2025 are £13,200. This does not include any additional costs of waste disposal while the travellers are in occupation, as these are covered in staff daily duties, but the additional time spent doing this means that less time is spent carrying out any other grounds maintenance tasks.

10.2. Community Impact. The Council have received 157 enquiries, and 21 official complaints and Freedom of Information requests about the unauthorised encampments on The Downs since 1st April 2025 **Exhibit CE2**. Around 48% of these were reporting allegations of nuisance and ASB. These include reports of defaecating and urinating in the bushes, reports of assaults and intimidation, litter, fires/BBQs, lack of parking and of Downs users feeling increasingly unsafe using The Downs for recreational purposes.

10.3. Damages to the Council infrastructure. The Toilets were repeatedly vandalised while the last group of travellers were on the Sea Walls area of The Downs. The toilets are located in the area edged green on Circular Road. The Downs Depot also experienced some vandalism and additional security visits were paid for during the night while the travellers were in occupation. The total costs for these repairs and additional security are £3254.38 to date, we estimate these costs will increase to nearly £4,000 in total.

10.4. Preventative measures. The Council has installed a line of posts along the south of Ladies Mile to deter travellers from setting up unauthorised encampments between Ladies Mile and Zoo Banks. This is the most vulnerable location on The Downs because it is the site or adjacent to the site of several income generating events, it is close to the depot where The Downs team are based with all their machinery and tools, it is where the Avon Gorge and Downs Engagement Project runs most of their education activities with schools and colleges and in an area of ecological interest. The cost of posts for this small stretch and the area by the Downs depot was over £8,600. It would be prohibitively expensive to do this around the whole of The Downs and the Council would need to consult extensively with different users of The Downs, including the travellers that have been coming to The Downs for decades, if not hundreds of years. This consultation would be very resource heavy.

10.5. Events. The Downs hosts several events every year. The events draw in residents and visitors from outside the city and generate income which is used to manage The Downs. Event organisers estimate that they have spent an additional £48,000 this year to deal with issues caused by the unauthorised encampments, mostly travellers but also vehicle dwellers. In 2023 Adventure Cinema was so badly affected by the travellers it had to pack up and leave on the first day and has never returned to The Downs. If other organisers decided that the costs of running events on The Downs was greater than the income they received or benefits given, the Council would lose between £72,000 and £134,000 per year in income. Since 2022 the Council already estimates it has lost around £56,000 in lost fees or discounts to organisers to compensate for the impact of the unauthorised encampments on their events. The Report in **Exhibit CE3** from the Council's Site Permissions team details the issues that organisers have had with unauthorised encampments in 2025 and before and email **Exhibit CE4** details specific issues from the latest event to be affected by the travellers particularly around the time of the action taken to enforce the first Possession Order this year**.**

10.6. Wildlife. The impact of human activity, including unauthorised

encampments, on the long-term ecological sustainability of The Downs is set out in **Exhibit CE5** It identifies 5 different impacts on the ecosystem of The Downs:

- soil compaction by vehicles driving on the greenspace
- nutrient loading caused by waste from humans and dogs
- invasive species from flytipped garden waste
- direct damage from fires and litter

and sets out a number of recommendations to reduce these impacts. The issues have been reported on local and national news and to statutory Government Agencies for action **Exhibit CE6**

11. On 08.07.2025, there was a Full Council Meeting at City Hall which was attended by members of the public, Councillors and Officers of the Council. The public submitted questions to Councillors concerning several matters concerning the City of Bristol. However, there were many questions submitted from the public in relation to The Downs. The questions were concerned with the constant presence of unauthorised encampments on The Downs, and questions concerning what the Council and the Police are doing to solve this issue. There were also questions about the alleged ASB caused by unauthorised encampments and the significant health hazards and potential dangers that are created by their presence.

9.1 There was also a petition submitted by Mr Nelson who spoke to the petition before it was debated, and Mr Nelson reported various matters which had been drawn to his attention regarding ASB. The questions which were posed and the answers given along with a copy of the petition are shown in **Exhibit CE7**.

9.2 The answers which were given detail several of the legal challenges facing the Claimant in dealing with the presence of unauthorised encampments on the Downs. In particular, a wholesale removal of every vehicle dweller on the Downs is not practical at the present time. I have spoken about this in my previous statement, but the important thing with this injunction application is to prevent any further increases in numbers and to address some of the very substantial issues of nuisance behaviour whenever a fresh encampment occurs as was the case with

the impact on the Race for Life.

Reasons why we seek an injunction

12. In addition to the problems that are caused by travellers and vehicle dwellers to which I have referred above, the legal remedies are limited as I have said in my previous statement.

10.1 Possession proceedings.

10.1.1 If a trespass were to occur on a Monday, the Claimant would need to investigate the trespass and speak to the members of the unauthorised encampment to ascertain their intentions. It might be that they are there a day or so and it might be possible to negotiate an orderly departure within that time frame. As part of that initial discussion, we would have to investigate whether there were any vulnerable people on site having regard to our statutory duties as set out at the Full Council meeting.

10.1.2 In this theoretical scenario we will probably be giving trespass notices and requests to leave on the Tuesday or Wednesday.

10.1.3 Proceedings will then have to be issued at the Bristol Civil Justice Centre on Wednesday. It would be a question of discussion and negotiation with the Court office as to when the case could be heard. Given that the occupiers are entitled to two clear working days' notice of the hearing, the earliest the Court could hear the matter would be realistically Tuesday because the Court would have to issue the proceedings and the Claimant arrange for service in accordance with CPR 55.6.

10.1.4 Assuming the hearing is on a Tuesday the Court would make an order for possession forthwith and be requested to transfer the proceedings into the High Court for enforcement.

10.1.5 It is very likely that the Claimant will not receive the Writ and associated papers until Wednesday or Thursday, given the pressures on the Court generally, and

so the eviction will take place on the Thursday or Friday subject to the availability of the Police to attend.

10.2 Similar time frames in terms of notice will apply to applications under S.77 of the Criminal Justice and Public Order Act 1994 (the Act). So having taken the initial steps of investigation the Claimant will serve a direction to leave giving the occupiers a length of time to go. If they do not go then the Claimant has to apply to the Magistrates Court for a S.78 Order, authorising the removal of the dwelt in vehicles which have been served. Such a Court application also needs at least two clear days' notice. There are issues in relation to what happens with other vehicle dwellers who arrive after the notice has been given.

10.3 The Claimant is the Highways Authority for Bristol. It has various powers under the Highways Act 1980 to remove obstructions on the Highway. Again, these will usually involve prosecution for example under S.131 and S.137. It was suggested at the Council meeting that the Claimant could also use S.143 of the 1980 Act, but this is quite a prolonged process because under S.143(3) we cannot exercise our powers until the expiration of 1 month of service of the notice.

10.4 Other suggestions made at the Full Council meeting included the use of Byelaws and Public Spaces Protection Orders.

10.4.1 There are already Byelaws in relation to The Downs. Penalty for a breach of a byelaw is a fine and we would be seeking to prosecute an unknown itinerant person.

10.4.2 As regards to PSPOs these were discussed by the Supreme Court in the Wolverhampton case and the Court was sympathetic to the submissions made on behalf of that local authority that PSPOs would not provide significant advantages to a local authority faced with a large traveller encampment. The Claimant's Advocate will expand upon this in detail at the hearing as some of the same concerns of the penalty for breaching a PSPO apply to breaching a byelaw.

10.4.2.1 Ironically it is legally possible to enforce compliance with the byelaws by an injunction.

10.5 I have referred to earlier on in this statement to the involvement of the Police and I respectfully refer to the S.9 statement of Sergeant Gentry as regards to reports made but what is significant is that the statement is without any detail whatsoever of any criminal action being taken against any vehicle dweller or tent dweller on the Downs. I cannot speak for the Police decisions, but I make the observation as with regards to prosecution that there is the question of identification and proof of an offence (similar to a byelaw or PSPO breach) of proof beyond reasonable doubt.

10.5.1 I refer back to the answers given to questions from members of the public to Full Council. It will be noted that a lot of them did relate to questions regarding what was perceived to be a lack of Police action to which quite rightly the Council could not speak, but there are various references in the answers to an Article in the Bristol Live online publication by the then Police Superintendent for the Downs of the logistical difficult of enforcing the law on such a large area as the Downs. Whether I agree with that or do not agree with that commentary that appears to be a fairly detailed summary of why the Police cannot take significant action. The Superintendent sets out the problems of Policing the area generally. The statement of Sgt Gentry is interesting as it does not actually say that any Police intervention has taken place as to engaging with or arresting any person suspected of any of the activities reported to the Police.

10.5.2 There are discussions of the possibility of further patrols but that is a long-term aspiration and will require significant resources to pay for any such facility and of course could not be 24/7 and 365 days a year.

10.6 The Police also have powers under S.61 and S.62 of the 1994 Act. The Police have used S.62 on the Downs only once as I recall and that was because of a very significant problem being caused by a particular group of travellers. Both S. 61 and 62 again involve prosecution. My legal team will expand upon this at the hearing by reference to the legislation and the observations of the Supreme Court.

10.7 A legal possibility is the common law power of ejectment. Again something on which the Court will be addressed upon by my legal team, but I make the observation that any action under the common law will have to be preceded by statutory obligations

on investigation and consideration but is probably contrary to the ECHR and is not something that we would consider bearing in mind that unlike use of CPR 55 or even S.78 come to that will be carried out the aegis of a Court Order.

11.The remedy and its application.

11.1 Drawing all this together I submit that the justification for an Injunction is made out given that none of the other remedies will provide an efficient and effective response.

11.2 The Claimant's lawyers have amended the Claim Forms to seek relief under the Anti-Social Behaviour Crime and Policing Act 2014. This I submit will address the anti-social behaviour I have detailed above from inter alia reports to my colleagues in the Downs office and other departments of the Claimant, the evidence from the Police both in the statement and the Bristol Live article and the questions and petition. I myself can speak to having seen occupiers on the Downs being aggressive to the Councils enforcement officers and have seen firsthand the damage to our facilities such as the toilets and the Downs compound. Furthermore, every time I have inspected the site of a trespass following an eviction there is significant evidence of public defecation and other health hazards posed by some of the other waste that has been dumped such as food, duvets, green waste, glass **Exhibit CE8**.

11.2.1 The presence of human faeces does pose a significant health risk, and although it may be apocryphal there was a report that a child suffered a potential problem with their vision through an encounter with faeces very close to one of the traveller encampments.

11.3 Accordingly I respectfully submit that the driving of quadbikes and other vehicles on the grass, the dumping of waste, stone throwing, dogs running loose are all matters which can cause a significant risk of harm. Accordingly, I would invite the Court to attach a Power of Arrest to such terms of the Injunction as it deems appropriate.

12. I understand that Injunction proceedings have to be served personally, however, as this is a case concerning Persons Unknown I seek an order that personal service

be dispensed with and service is effected in the method already indicated by the court. At the hearing on 01.07.2025 the Court indicated that service of the application and evidence could be effected by service in the same way as the possession proceedings had been and this of course will be done.

12.1 The bigger challenge is the service of any order made.

12.1.1 Subject to the Court's better view are proposal of service of the Injunction and enforcement thereof will be effected in the following ways:

12.1.2 If an encampment sets up on The Downs including Ladies Mile we will carry out our investigations and if we determine to take action we will serve a copy of the Injunction on every person present and require them to leave. Service of the Order and the request may be made by an Officer of the Claimant, an enforcement agent or the Police. The occupiers will be given a time to leave taking into account all the circumstances of the trespass and will be warned of the consequences of the breach, for example Arrest or committal (I am of course acutely aware that this is a fluid situation whenever trespass occurs and different encampments may require different responses depending on the particular circumstances).

12.1.3 One of the alternative responses to breach of the Injunction might be the use CPR 70.2A which could involve the physical removal of vehicles and tents or other structures. This is an alternative remedy for breaching an injunction. My legal team will address this at the Court hearing, but I anticipate it is something that will require additional advocacy and evidence should the Claimant seek an alternative to enforcement by way of an arrest or committal. It may become necessary because arrest and committal will require the support of the Police as will any eviction under CPR 55. I mention this so as to ensure the Court has as full a picture as possible.

13. In all the circumstances I submit the criteria for a newcomer injunction in accordance with the decision of the Supreme Court are met, and I seek an Injunction in the following terms.

Persons Unknown on Durdham Down, Clifton Down and Ladies Mile residing in tents,

structures, caravans, or other vehicles adapted for residential purposes be forbidden from:

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

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

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

iv. Causing any nuisance to any person lawfully on Durdham Down, Clifton Down and Ladies Mile by dangerous driving of any vehicle, making any threats, abuse or noise or allowing any animal to be out of control and not disposing of its waste.

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

Vacate any part of Durdham Down, Clifton Down and Ladies Mile within 5 hours of any request by an authorised officer or agent of the Claimant or a Police Officer and not return without the permission of the Claimant.

13.1 These terms are very slightly different to the ones initially in the application for an Injunction and of course may well be varied by the Court if it is not considered they are sufficiently clear. Although I submit that they are fairly basic terms and can be easily complied with.

13.2 In accordance with the guidance of the Supreme Court it may well be that a longer period of time may be required for an occupier to vacate and so the actual request to leave may follow on from the Welfare enquiries we undertake and also from

discussions with any occupier. So, the actual breach of injunction would not occur unless and until a formal request is made under paragraph iv of the Injunction.

13.2.1 As I said above it may well be that the breach of Injunction will not be followed by an arrest so the Claimant retains flexibility in relation to the enforcement method it chooses as one of our other statutory powers or the Police using their own statutory powers may be a more apposite response.

14. In the N208 and N16A we have built in the application a provision to discharge or vary the Order in accordance with the guidance from the Supreme Court. The Court may dispense with the application notice but that is a matter for the discretion of the learned Judge.

15. The only other point is whether a Power of Arrest should be attached to any part of the Injunction. I have referred above to the statutory test under s.4 of the 2014 Act and I would submit that it would be appropriate to attach a Power of Arrest to all of the terms of the Injunction.

Statement of Truth

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

SIGNED: Caroline Ennion

DATED: 16th May 2025

On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE01
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

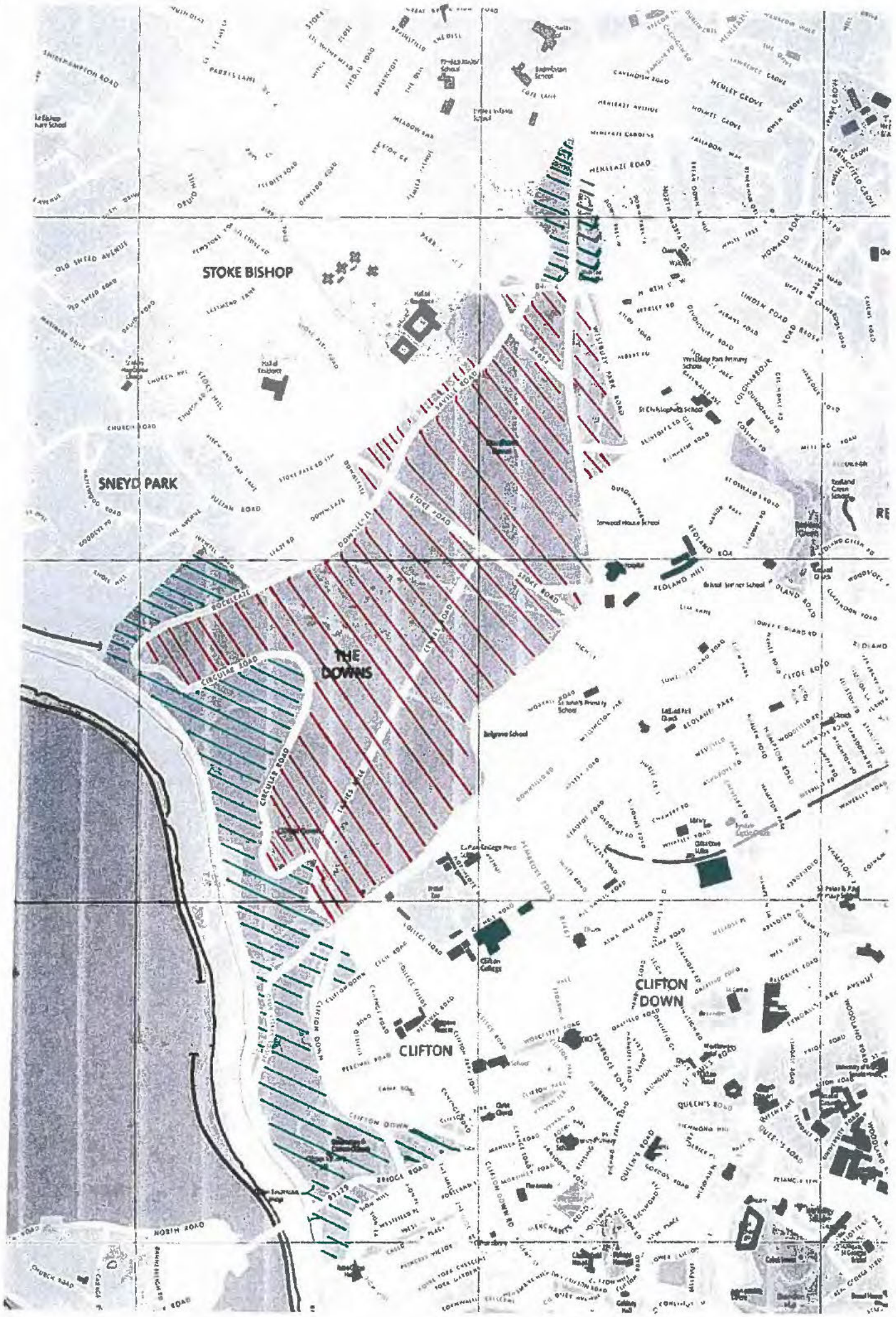
Claimant

and

PERSONS UNKNOWN

Defendants

EXHIBIT CE01


STOKE BISHOP
SNEYD PARK
THE DOWNS
CLIFTON
CLIFTON DOWN
STOKE ROAD
CIRCULAR ROAD
ROSELEAZE
DOWNLEAZE
WESTBURY PARK ROAD
REDLAND HILL
REDLAND ROAD
HENLEAZE ROAD
QUEEN'S ROAD
WHITELADIES ROAD
BRIDGE ROAD
CHURCH ROAD
SAVILLE ROAD
HOWARD ROAD
LINDEN ROAD
WOODLAND ROAD
ST OSWALD'S ROAD
HAMPTON ROAD
WAVERLEY ROAD
ST PAUL'S ROAD
ST MICHAEL'S HILL
PARK ROW
PARK STREET
COLSTON AVENUE
BRISTOL
CLIFTON COLLEGE
Redland Green School
Bishop Road Primary School
Westbury Park Primary School
St Christopher's School
Badminton School
Belgrave School
Tyndale's Park
Clifton College
Clifton Hill House
Clifton Park School
Queen Elizabeth Hospital
Cotham College Prep
Tyndale Park
Victoria Rooms
Clifton Suspension Bridge
Observatory
Cabot Tower
Colston Hall
Park Row
Broadmead
Cathedral
Council House
Museum
Library
Theatre
Hippodrome
Bristol Zoo
Clifton Down
Clifton Village
Whiteladies Road
Queen's Road
Stoke Road
Downleaze
Roseleaze
Circular Road
Redland Hill
Redland Road
Henleaze Road
Westbury Park Road
Saville Road
Howard Road
Linden Road
Woodland Road
St Oswald's Road
Hampton Road
Waverley Road
St Paul's Road
St Michael's Hill
Park Row
Park Street
Colston Avenue
Bristol
Clifton College
Redland Green School
Bishop Road Primary School
Westbury Park Primary School
St Christopher's School
Badminton School
Belgrave School
Tyndale's Park
Clifton College
Clifton Hill House
Clifton Park School
Queen Elizabeth Hospital
Cotham College Prep
Tyndale Park
Victoria Rooms
Clifton Suspension Bridge
Observatory
Cabot Tower
Colston Hall
Park Row
Broadmead
Cathedral
Council House
Museum
Library
Theatre
Hippodrome
Bristol Zoo
Clifton Down
Clifton Village
Whiteladies Road
Queen's Road
Stoke Road
Downleaze
Roseleaze
Circular Road
Redland Hill
Redland Road
Henleaze Road
Westbury Park Road
Saville Road
Howard Road
Linden Road
Woodland Road
St Oswald's Road
Hampton Road
Waverley Road
St Paul's Road
St Michael's Hill
Park Row
Park Street
Colston Avenue
Bristol

On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE02
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendants

EXHIBIT CE02

Red text - allegations of public nuisance and ASB including criminal behaviour, threatening behaviour, driving on the grass, using The Downs as a toilet, fires/BBQs, litter. NB Records to 16th July 2025

Date	Title of Enquiry	Details
02/04/2025	ME - Illegal parking / dwelling on The Downs 58056865	Hi Please can I get an update on all van dwellers on the downs and whether there is enforcement planned against them? Kind regards, [redacted] Green Party Councillor for Clifton Down Subject: Re: Illegal parking / dwelling on The Downs Thank you for the reply, but I'm afraid I still have no clarity on what is actually being done to remove the vehicles, and it is frustrating that the answer to a residents query is to refer them to a 268 page report. Having reviewed the report, albeit at high-level, my main takeaway is that there is no clarity, or indeed urgency, on moving the offending vehicles and improving the situation. The stated purpose of the report is to update the committee on a report published some 12 months ago and then to 'discuss key points for ongoing discussion'. In fact the first point discussed is about rewriting a document first published six years ago! Moreover, the bulk of the report appears to focus on the needs of the vehicle dwellers, the different categories of dwellers, and how the myriad different teams and departments within the council might work together. There is little concrete action, timescales, or ownership. So, to reiterate, please can the council confirm when the illegally parked vehicles on The Downs will be moved? Councillors Ralston and Calascione - I would appreciate your views on this.
03/04/2025	Charges on the downs 58189994	Is it true that the council is thinking about charging to park on the Downs in order to force the van dwellers out?
12/04/2025	ME - Cllr. John Goulandris - Unlawful traveller encampment on the Downs / update re 'blanket' injunction re Downs 58419054	Please see attached e mail from my constituent. 2 issues : Unlawful encampment reported near Zoo side of Downs. You may already be aware of this. There has in the past been a 'blanket' injunction re unlawful encampments on the Downs, which has facilitated the eviction process. Please can you advise if a 'blanket' injunction has been sought/obtained for the current year. Councillor John Goulandris Bristol City Councillor for Stoke Bishop Ward To: Councillor John Goulandris [redacted] Subject: Re: Downs there is an encampment on the zoo side when we went past yesterday it was quite large but as we were driving I'm not sure how extensive it is they do tend to grow rapidly though. Have you raised the injunction recently with the council? It might help to underline the cost savings with court times, social services. Policing etc which in these straightened times is very much an issue! Could you send us a link or contact details for the campaign group please as we would obviously like to support it. There is now an encroachment around the Seawalls stretch of currently 4 of 5 vans since the meeting which may be coincidental or maybe they are bouyed up by the fact the council has no interest in moving forward any time soon.
28/04/2025	Service request - Area Manager East/Central 58708974	Yesterday afternoon (27th April) there were in excess of 20 cars sporadically parked all over the Downs with BBQs roaring. It is not socially acceptable to drive and park on the grass like this, nor light BBQs (some of them gas!) so close to vegetation (that could catch fire). Nor is is acceptable for other Downs users, pets etc. The litter and waste is out of control. When I was young rangers used to patrol the Downs putting out bbq's as a deterrent. What's happened to any kind of law enforcement? A couple of Friday's ago, I saw the council had ticketed a car in a parking bay for presumably exceeding the 4 hour limit. Outrageous! When van dwellers can live in a bay without penalty, 'tree surgeons' can live on the Downs for weeks at a time leaving their waste behind them and anyone can drag a gas canister into the middle of dry vegetation and light a bbq for the afternoon. You HAVE to start using our council tax for one of the key purposes it was intended for and properly enforce usage and litter rules. My dog inadvertently ate human waste near one of the vans at the start of the year and suffered cannabis poisoning (over £600 in vet fees) and yesterday there were men and children wandering out of bushes clearly having just been to the toilet whilst 'enjoying a family bbq'. It's absolutely disgusting.

28/04/2025	IR - The Downs 58803375	Dear Sir/Madam, Under the Freedom of Information Act 2000, I formally request the following: 1. A full timeline of actions taken by Bristol City Council in relation to the dwellers at The Downs in the past 12 months. 2. Details of any risk assessments or environmental health reports carried out in relation to the site. 3. Minutes of any meetings or internal communications discussing the matter. 4. The council's future plan of action with specific timelines and allocated responsibilities. 5. Any liaison or correspondence with police, housing agencies, or health services regarding this issue. I am writing as a concerned resident and parent who regularly walks with my young daughter and dog through The Downs in Bristol. The current situation involving dwellers and encampments in this area has become untenable and deeply distressing. During a recent walk, I was shocked and appalled to witness what appeared to be human faeces alongside a pile of fly-tipped waste. This, combined with the general state of neglect, poses serious safety, hygiene, and environmental concerns for the community. Most disturbing of all, there appear to be cages suggestive of illegal puppy breeding. I am outraged by the apparent lack of police presence and enforcement in the area. Despite ongoing public discomfort and the apparent deterioration of this public space, it seems the council has taken little or no effective action to resolve the matter. The area no longer feels safe or appropriate for children, families, or dog walkers. Furthermore, I urge the council to consider the Environmental Protection Act 1990, which obligates local authorities to take action against public nuisances and environmental hazards. The current condition of The Downs may constitute a breach of the council's statutory duty under this Act, particularly if there is uncollected waste, public health risks, or other environmental hazards. I request a written response to this complaint and FOI request within the statutory deadline of 20 working days. Should no adequate response or action plan be received, I will not hesitate to escalate this matter to my the Local Government Ombudsman, and relevant media outlets. This is a matter of public health, safety, and responsible governance. I look forward to your prompt and appropriate response. Yours faithfully

		regards, John Councillor John Goulandris Dear John, I hope you enjoying this lovely weather ! Long may it continue. I have just read the latest draft minutes from the Downs committee and have a couple of queries I wonder if you can answer. Despite Ian Bowen saying no injunctions were raised but writs, the Downs committee are still referring to injunctions and suggesting longer and further reaching ones . Is this still an option in light of Ian Bowen's email? Also ' noting that since the last meeting of the Downs committee the Panels dedicated email address and phone line had received and logged twenty-five contacts, the content of inquiries remained unchanged with complaints about kerbside vehicle dwelling continuing to dominate.' Is that email and dedicated phone line still operational if so what are the details? I was totally unaware of it and I suspect so are most residents so the number of complaints would have been way in excess of 25. It might also be helpful to detail what the police are regarding as criminal offences which they are obliged to act on and what is anti social behaviour again those which require action. Obviously unless one stays on the Downs for hours on end it is not possible to always provide footage of actual driving on the Downs just the parking especially if ,as most do, they leave after dark. I have been assuming the recent tent encampment folk at twitchers corner are covered by the same laws that apply to the travellers and will require a writ to move on? Having said that there is the concern that this will become known and there will be regular tent cities presumably anywhere on the Downs. Do you know if the Downs committee intend to address this?
01/05/2025	ME - Cllr. John Goulandris -Questions re Downs Committee and unlawful encampments on the Downs 58947233	The Committee received an update report from the Business Development Manager on business opportunities at key locations across the Downs. These included – a) Zoo - North Car Park b) Stoke Road Pitches including proposed Mini Golf facility and Padel Courts. c) Stoke Road changing rooms.

03/05/2025	ME - Formal Complaint - High Impact Encampment on the Downs: Request for Immediate Action 59028333	need to be co-ordinated. With kind regards, John Councillor John Goulandris Dear Councillors and Officers, I am writing as a concerned resident and supporter of the Protect the Downs Community Action Group to formally submit a complaint regarding the ongoing van dwelling encampments and the alarming rise in unlawful activity on the Downs in Bristol. These encampments meet multiple criteria defined by Bristol City Council for being considered “high impact” and warrant immediate intervention. As of 1st May 2025, there are 131 camper vans and caravans around the Downs—an increase from 104 in February 2025 and 98 in November 2024. The situation is clearly deteriorating. The Council’s permissive stance appears to be encouraging more vehicles to join these encampments. Parry’s Lane has worsened significantly, with coaches now forced to park dangerously in the middle of the road. Circular Road is heavily impacted, and vans are now blocking entrances to The Grange for over-60s, Saville Manor Care Home, University Halls, and are parked illegally on surrounding double yellow lines (e.g. [redacted]). This creates serious risks to the safe passage of emergency vehicles and endangers the safety of pedestrians, elderly residents, students, and children. Vehicles have also been seen parked on the Downs themselves, obstructing walking paths, for example at https://w3w.co/neck.verse.minds and https://w3w.co/sage.formed.plates. There are repeated reports of threatening and anti-social behaviour, including daily instances of cars being driven recklessly on the grass, handbrake turns, and the use of quad bikes. On the evening of Wednesday, 30th April, at least 11 cars were parked on the grass and four fires were observed—one left smouldering and emitting black smoke. Previously, signage warned of fines for lighting fires. Have these signs been removed? If so, by whom? Fires present an obvious and increasing danger, particularly during hot and dry weather. On Thursday 1st May at around 7:00 PM, while driving around Circular Road, I noticed eight vehicles parked across various areas of the Downs, including directly opposite the Sea Walls viewpoint. Despite there being ample legitimate parking bays available, these cars were stationed on the grassland itself. In some cases, vehicle owners were sunbathing or picnicking beside their cars—right in the middle of protected parkland. This misuse of the Downs not only damages the environment but also detracts from the safety and enjoyment of the space for others. Clear signage is needed to educate visitors that parking is only permitted in designated bays—not on the Downs themselves. This should be coupled with appropriate enforcement to uphold the regulations and protect this important public space for everyone. Environmental damage is mounting. The Downs are not equipped to support overnight habitation. On 1st May 2025, bins along Ladies Mile were overflowing. On Wednesday, 30th April, grey water and other waste were seen leaking onto the road and parkland from a converted lorry [redacted] on Saville Road. It is illegal to discharge grey water onto a public highway or into highway drains, and such waste has the potential to contaminate the environment and block access routes. Evidence of further ecological damage—fire pits and felled trees—can be found at https://w3w.co/zeal.keen.puns. These incidents directly contradict the area’s conservation status and suggest a failure in duty of care. Over the Easter weekend, a peak in illegal vehicle activity was observed, including drug use, dangerous driving on grassland, and the lighting of fires. Despite this, police patrols have routinely passed by the encampments without taking enforcement action. Even after approaching a patrolling officer they declined to intervene. This lack of action by the police, though perhaps due to stretched resources, is severely undermining public confidence in the authorities’ ability to manage and protect the Downs. This once-beautiful green space is becoming a lawless zone. Without urgent action, it is only a matter of time before someone is seriously injured. The issue of inconsistent enforcement is deeply frustrating. On 30th April, a parking attendant was seen issuing a ticket to a vehicle over its time limit in a marked bay on Circular Road, while numerous camper vans and caravans parked illegally in parking bays and the grass received no penalty. Why are these vehicles not being held to the same standard as every other Bristol resident? On 28th April 2025, an ambulance [redacted] with on-duty crew was parked on the grass across a running path, with its crew picnicking nearby—despite legal parking being available across the road. This sets a poor example and reinforces the growing perception that the Downs are beyond the reach of normal rules. Clear signage should be installed to inform all users of the expectations and legal boundaries. Encampments are dangerously close to homes, care facilities, schools, and other public spaces. They are now also encroaching into criminal and regulatory grey areas. An encampment that appeared on Circular Road on 25th April 2025 remains in place. It features tents, a drum kit, piles of firewood, and an outdoor kitchen (https://w3w.co/effort.token.stuck). This group appears to be affiliated with a registered charity, Back on Track (Charity No. 1172185), reportedly involved in addiction rehabilitation. Is this organisation complying with Downs byelaws and Charity Commission regulations? Is tent camping now permitted on the Downs? Why has no enforcement action been taken in over a week? These issues endanger public safety, damage a vital conservation area, and reflect a broader failure to uphold the rights of Bristol

		I am writing to request information under the Freedom of Information Act 2000 regarding the actions taken by Bristol City Council and other relevant authorities in relation to individuals living in vehicles (van dwellers) on the Bristol Downs since January 1, 2020. To help me understand the Council's approach and the actions taken, I would be grateful if you could provide the following information: 1. Meeting Minutes and Actions: Copies of the minutes from all meetings (including committee meetings, working group meetings, internal departmental meetings, etc.) where the issue of van dwellers on the Bristol Downs was a substantive agenda item or a significant point of discussion since January 1, 2020. For each meeting identified above, please provide details of the specific actions that were agreed upon or arose as a result of the discussions regarding van dwellers on the Bristol Downs. For each action identified, please provide the date the action was initiated and the date it was considered closed or completed. If an action is ongoing, please provide its current status and expected completion date. 2. Correspondence with External Agencies: Details of all correspondence (including emails, letters, and formal reports) between Bristol City Council and the following agencies regarding the issue of van dwellers on the Bristol Downs since January 1, 2020:
06/05/2025	IR - Van Dwellers Bristol Downs 58972533	
22/05/2025	Communications of any description re the Downs 58919505	Dear Bristol City Council, Please disclose copies of all communications regarding the Downs made during the period 20/3/2025 to 2/5/2025 inclusive to include notes memorandum, transcripts, emails and letters . Yours faithfully Dear Sir/Madam I am writing as a concerned resident and parent who regularly walks with my young daughter and dog through The Downs in Bristol. The current situation involving dwellers and encampments in this area has become untenable and deeply distressing. I was shocked and appalled during a recent walk to see what appeared to be human faces sculpted or placed in the area'this, alongside the general state of neglect, raises serious safety and environmental concerns. Despite ongoing public discomfort and the apparent deterioration of this public space, it seems the council has taken little or no effective action to resolve the matter. The area no longer feels safe or appropriate for children, families, or dog walkers. Under the Freedom of Information Act 2000, I formally request the following: 1. A full timeline of actions taken by Bristol City Council in relation to the dwellers at The Downs in the past 12 months. 2. Details of any risk assessments or environmental health reports carried out in relation to the site. 3. Minutes of any meetings or internal communications discussing the matter. 4. The council's future plan of action with specific timelines and allocated responsibilities. 5. Any liaison or correspondence with police, housing agencies, or health services regarding this issue. Furthermore, I urge the council to consider the Environmental Protection Act 1990, which obligates local authorities to take action against public nuisances and environmental hazards. The current condition of The Downs may constitute a breach of the council's statutory duty under this Act, particularly if there is uncollected waste, public health risks, or other environmental hazards. I request a written response to this complaint and FOI request within the statutory deadline of 20 working days. Should no adequate response or action plan be received, I will not hesitate to escalate this matter to my local MP, the Local Government Ombudsman, and relevant media outlets. This is a matter of public health, safety, and responsible governance. I look forward to your prompt and appropriate response. Yours faithfully,
25/05/2025	IR - Request Regarding Dwellers at The Downs, Bristol 58672609	CLARIFICATION EMAIL Thank you for your message and for seeking clarification. To confirm: The first question relates to actions taken over the last 12 months. The remaining questions refer to the last 2 years. All questions are specifically regarding encampments, which include van dwellers, tents, and travellers only'not other activities or risk assessments relating to general operations on The Downs. I hope this provides the clarity needed. Please let me know if you require any further information.

		Bristol. This is of particular concern where people with high support needs who would otherwise be rough sleeping, are living in rented caravans on the highway or squatted sites' In the above publication Bristol City Council acknowledges and admits that people are actually renting caravans to live on the streets. In other words, people are renting out 'homes. It is noted that the council has refused to remove van dwellers from roads as these camper vans and van are classed as 'homes' In essence there seems to be the rental of 'homes ' yet these homes do not comply with legislation that requires all homes to be fit for human habitation. I refer you to the fitness for human habitation act. The Homes (Fitness for Human Habitation) Act 2018 requires landlords to make sure their rented homes are fit to live in at the start of a tenancy and remain in good condition for the duration of the let. 'The Act, which is an amendment to the Landlord ,and Tenant Act 1985 was introduced in March 2019 for new and renewed tenancies, then extended to all tenancies from 20 March 2020. Although the Act doesn't impose any new obligations on landlords in terms of health and safety measures, it clarifies the law to make sure minimum standards are met at the outset of a tenancy and allows tenants to take legal action if standards drop. You should be aware that there is no limit to the level of compensation that can be awarded to the tenant it's at the discretion of the judge' Has the council obtained external legal advice about this or any legal advice? If not, why not? In the circumstances , what steps have the council taken to identify these landlords of what has to be slum caravan dwellings that have no sanitation? What steps are taken to ensure that these rented out homes meet the minimum standards required of landlords eg gas certificate, electrician certificate etc etc What steps have been taken to condemn these rented out homes and remove them from use? What steps have been taken to fine these landlords of caravans rented out to people to live in? What steps has the council taken to survey and stop people dropping off caravans onto the road to be rented? What steps has the council taken to identify these people who deposit caravans onto the road with no licence and create an obstruction in the hope of making a profit from offering slim dwellings. What stops does the council take to ensure that these caravans conform to road safety and are properly lit? What steps does the council take to ensure that these poorly lit obstructions or camper vans have insurance or will they accept any claim should such a large inappropriately and poorly lit object cause a road accident? Has the council taken any legal advise about its liability should such an accident occur? I refer the Council to the following legislation For the purposes of [F177 Part III of the Environmental Protection Act 1990] a tent, van, shed or similar structure used for human habitation' (a) which is in such a state, or so overcrowded, as to be prejudicial to the health of the inmates; or (b) the use of which, by reason of the absence of proper sanitary accommodation or otherwise, gives rise, whether on the site or on other land, to a nuisance or to conditions prejudicial to health, shall be a statutory nuisance, and the expression "occupier" in relation to a tent, van, shed or similar structure shall include any person for the time being in charge thereof. What steps has the council taken to ensure compliance with this primary legislation that is more binding than any council policy because it is primary legislation Does the council inspect each and every caravan to ensure proper sanitation accommodation? If so please disclose all assessments and documentation, What steps has the council taken to remove those caravans deemed 'statutory nuisance'. Note that there is no qualification or assessment or matter of opinion. - A van used for habitation without proper sanitation accommodation is deemed a statutory nuisance. How many vans are used for habitation around the Downs without proper sanitation? How much provision has BCC made for legal claims as a consequence of a group action from potentially all householders and Downs users for the impact of having over 100 vans on roads around the Downs without proper sanitation accommodation and that use buckets, local bins and local runoff fresh water drains to dispose of waste. Yours faithfully ---
26/05/2025	IR - The Downs Van Dwellers 59897913	Please use this email address for all replies to this request:
02/06/2025	IR - The Downs 60000412	Please provide the following details in relation to the Clifton and Durham Downs 'the Downs' for the financial years 2019/20, 2023/24 and 2024/25, and if available, April and May 2025: 1. The total gross amounts spent in relation to the Downs, split between appropriate categories (welfare, cleaning, maintenance etc). 2. The amounts spent on cleaning, removing and disposing of rubbish from the Downs, split between amounts attributed to normal usage, amounts attributed to 'events' (such as Fairs, circus etc), amounts attributed to illegal activity, amounts attributed to travelers, encampments and van dwellers. 3. The amounts spent on eviction or removal of van dwellers, travelers and the people/vehicles residing in unauthorized encampments. Please analyse between the nature of the cost eg staff salaries, court fees etc and provide the total number of evictions. If there are restrictions on the amount of data that can be provided due to time constraints, please prioritise the provision of the most recent data. Many thanks

07/06/2025	Complaint - Gypsies / Van Dwellers on the grassed area Durdham Downs 61150414	To whom it may concern, I am writing to express how utterly appalled I am at the lack of action from Bristol City Council to remove the van dwellers / gypsy encampment all over the downs. When will they be removed??! There is now yet ANOTHER encampment that have moved in! Having grown up in Sneyd Park, the Durdham Downs once used to be a beautiful place to go for a peaceful walk and take in the views along the cliff edge. Now it is a horrible slum where van dwellers are dumping their faeces along the pavement, urinating next to their beat up vans, dumping litter, bin bags and gas canisters in the middle of the road and trespassing into residential housing nearby to fill up their buckets with home owners (- council tax payers) tap water. I regularly visit my elderly mother in Sneyd Park and it saddens me that a home she once loved she is now thinking of selling and moving elsewhere as she is too frightened to walk along the downs for her regular exercise, for fear of drug dealers hanging out of their vans. It is an absolute eye sore to see these horrible vans. There are plenty of fields on the outskirts of Bristol, why can't they be moved there? Why in front of multi million pound homes with such beautiful history which is now being ruined. The word unfair doesn't do these residents justice. I have urged my family and friends to leave Bristol as it is not what it used to be. Tourism will suffer because of this, house prices will decline in one of the most prestigious areas in Bristol, there will be no community in Sneyd Park as everyone will have left and moved elsewhere. All thanks to a council who have done absolutely nothing about it.
12/06/2025	IR - The Downs rating 60443135	I write to you concerning the van dwellers on the downs. It has been reported by the BBC that the impact for The Downs area is currently rated at 'medium.' Please provide the metrics that have been used to rate the impact for this area and what measures would indicate a 'high', 'medium' and 'low' impact rating. Please provide the metrics used to establish a rating of 'high', 'medium' and 'low' impact for the area of The Downs. I would also like to understand how the Council has arrived at an impact level of 'medium' given the huge daily consequences visitors and residents are suffering. Please provide all documentation that has led to this impact level being issued. Please respond within the 20 day allocated period for FOI requests.
16/06/2025	IR - The Downs rating 60473044	In an article published in the Evening Post on 14 June 2005, link below, it states that Bristol City Council has assessed the impact of caravans and vans on the Downs as 'medium'. If correct, and the Council's impact assessment is 'medium', please can you let me know 1) when this assessment was made, 2) the criteria and metrics the Council has used to reach this assessment, and 3) how these metrics and criteria align to the assessment process laid out in the Council's current Policy for Vehicle Dwelling Encampments on the Highway, link below. If this is incorrect, and the Council's impact assessment is not 'medium', please can you let me know 1) when this assessment was made, and 2) what the assessment is. Thank you. Link to Evening Post article https://www.bristolpost.co.uk/news/bristol-news/van-dweller-dilemma-taking-over-10264232 Link to Bristol City Council's Policy for Vehicle Dwelling Encampments on the Highway https://www.bristol.gov.uk/files/documents/1779-bcc-vehicle-dwelling-encampment-policy-final2/file
20/06/2025	ME - Downs safety / van dweller issue : John Lee 60944389	Hi Please see attached email and photo, which are hopefully self explanatory. Please can you take appropriate action and respond to me so that I can reply to my constituent. Many thanks. With kind regards, John Councillor John Goulandris Hi John, I apologise for bothering you again on Downs issues. XX is doing a brilliant job on addressing the major issue but every now and then there is a specific that needs addressing. I am attaching a photo of a solar panels being used on the Downs to charge a piece of electrical equipment. These are not stable especially if they are not installed/used properly. If they burst into flames when someone was walking past (and they are laid across a clear footway used by many people every day) then the consequences would be serious. This needs to be removed and the individual responsible asked to stop it. And moved on if they do not. The problem will be that this is not always there which makes action difficult.The Downs have to be protected from such unsafe and irresponsible actions. Thank you
23/06/2025	IR - EIR - The Downs 60766673	I want to know WHY a long line of wooden posts have been planted in the grass verge/in the ground on what is the west (city centre) side of Ladies Mile (on the Downs)? So what purpose do these serve? How much have these cost so far, how many more posts are to be added and what is the total cost (so the full extent) of this project? I saw these first on Friday 20 June 2025.

26/06/2025	ME - Karin Smyth MP (Case Ref: ZA105155) Dwellers on Durdham D wns 61148216	Good afternoon Karin Smyth MP has been contacted by several constituents expressing concern about the ongoing issues with vehicle dwellers on Durdham Downs, which we understand have led to confrontation and violence. Specific concerns have been raised about some suggestions that a 'solution' might involve large permanent sites Bristol South, which have already been identified for housing development. There are two temporary vehicle dweller sites, a small permanent GRT site and we are expecting Elim Housing to seek planning consent for a second such small site soon within Bristol South. Please can you provide an update on short term measures to resolve the current problems on the Downs and also proposed long term solutions. Thank you for your help and we look forward to hearing from you. Yours sincerely Joe Salter Senior Researcher Office of Karin Smyth Labour MP for Bristol South
30/06/2025	ban vehicles from driving on the grassed area of the Downs 61040853	Large vechicles and vans driving along and across the footpath from the traveller's encampment near Ladies Mile. Young children use this path daily for school journeys, on foot, and we feel exposed and unsafe on a daily basis now.
07/07/2025	IR - EIR - The Downs Clean Up 61243960	There were significant Gypsy, Roma, Traveller sites established on Durdham Downs (Two / three distinct areas) at the end of June 2025, moving on approximately the 30th July or thereabouts. A major BCC clean-up operation took place immediately post-encampment. Please can you tell me the total cost of the clean-up operation (including man hours and other resources, waste disposal etc.)? Could you also please advise me what the total cost to BCC of post-GRT encampment clean-up operations for the last BCC Finanical year was please?
10/07/2025	ME - Cllr John Goulandris - Public health situation on the Downs 61653804	I have had cause to contact the public health dept and environmental health Uk today for the following reason. I was walking on the downs today and the stench around circular road of human excrement is considerable. I really had to keep an eye on my dog to make sure she did not eat anything toxic. It was so bad it made me gag and I had to go home. There is plenty of evidence that the downs is being used as an open latrine by the concentration of van dwellers and caravans on Savile road, parry's lane, sea mills and circular road which over the last few days has become even more inhabitated. This is actual now a contaminated area. The occupants of these vehicles are openly urinating and pooing in front of the public including children. There is clear photographic evidence of specific areas being designated as toilet areas by these dwellers and the stench in this heat especially, is totally unbearable. It's just smells of an open sewer.

Total	21
Red	6

Red text - allegations of public nuisance and ASB including criminal behaviour, threatening behaviour, driving on the grass, using The Downs as a toilet, fires/BBQs, litter. NB Records to 10th July 2025

Enquiry Number	Date	Site Name	Description
707707	08/04/2025 15:28	Clifton and Durdham Downs	go to the top of pembroke road and take path opposite. Go past tower and bear to left. Go past compound and keep walking towards Ladies Mile. on left hand side approx 20 travellers vehicles arrived this morning.
707887	12/04/2025 13:04	Ladies Mile	Litter everywhere close to travellers' caravans. Litter strewn around the field, in bushes and on the grass close to a site of travellers. Patches of burnt grass with empty bottles and litter strewn around.
707989	15/04/2025 00:24	Upper Belgrave Road To Rockleaze Footpat	Broken glass. Lots of broken glass on the path by the travellers - main path so risk to children and dogs!
708092	16/04/2025 16:48	Clifton and Durdham Downs	approx 10 caravans have just driven onto the Downs, opposite Rockleaze, in between 2 footpaths
708209	19/04/2025 17:18	Upper Belgrave Road To Rockleaze Footpat	Several large piles of rubbish. Several large piles of rubbish left behind by the travellers.
708328	23/04/2025 11:10	Clifton and Durdham Downs	I also think this caravan is empty, so presumably you could also tow that away and scrap it.At the same time I noticed there were three encampments of gypsies on the downs. This is totally unacceptable and I consider it your role to have them removed, especially as we pay council tax to keep the city looking
708562	28/04/2025 17:21	Clifton and Durdham Downs	What happened: Driving over Clifton and Durham downs to reach large encampments both sides of Ladies' Mile. Also driving quad bikes on the grass. Where did it happen: Clifton and Durham Downs. When did it happen: I observed this behavior Friday April 11th and Thursday April 17th
708577	29/04/2025 08:04	Clifton and Durdham Downs	What happened: Large numbers of caravans & motor homes have arrived on the downs, one group has already moved on leaving large piles of rubbish & the other has positioned themselves in a way that they have created a space the size of 2 football pitches it feels uncomfortable to walk through. Where did it happen: Durdham downs. When did it happen: Ongoing
708578	29/04/2025 09:05	Clifton and Durdham Downs	What happened: Multiple cars and vans driving over and parking on Clifton Downs next to Ladies Mile. Where did it happen: On Clifton Downs next to Ladies Mile. When did it happen: 21 April 2025 at 6.15pm.
708580	29/04/2025 09:09	Clifton and Durdham Downs	What happened: The travellers who have parked up on the Downs appear to be chopping down some trees/bushes as there are piles of felled and chopped trees. Where did it happen: https://maps.app.goo.gl/14h56wzxzUNvdQgb6. When did it happen: seen 13:00 22/04/25
709134	12/05/2025 09:24	Ladies Mile	Illegally parked caravan in public park. It's wrong!! Needs to be discouraged.
709180	12/05/2025 15:35	Clifton and Durdham Downs	Breach of bye law - tents erected on the Downs and camping overnight. Also Fire and barbecues in use, and camping overnight and : Camping overnight in caravans. Gas canisters on Downs. Waste thrown in bushes. Breach of bye laws Where did it happen: Saville Road, circular road and ladies mile
709193	12/05/2025 16:51	Clifton and Durdham Downs	Damage to park structure or furniture, including life-saving equipment, Van dwellers on the Downs are chopping down trees I have photographic evidence, this was on 30/04/2025 09:54
709229	13/05/2025 10:53	Clifton and Durdham Downs	Complaint details Yesterday afternoon (27th April) there were in excess of 20 cars sporadically parked all over the Downs with BBQs roaring. It is not socially acceptable to drive and park on the grass like this, nor light BBQs (some of them gas!) so close to vegetation (that could catch fire). Nor is is acceptable for other Downs users, pets etc. The litter and waste is out of control. When I was young rangers used to patrol the Downs putting out bbq's as a deterrent. What's happened to any kind of law enforcement? A couple of Friday's ago, I saw the council had ticketed a car in a parking bay for presumably exceeding the 4 hour limit. Outrageous! When van dwellers can live in a bay without penalty, 'tree surgeons' can live on the Downs for weeks at a time leaving their waste behind them and anyone can drag a gas canister into the middle of dry vegetation and light a bbq for the afternoon. You HAVE to start using our council tax for one of the key purposes it was intended for and properly enforce usage and litter rules. My dog inadvertently ate human waste near one of the vans at the start of the year and suffered cannabis poisoning (over £600 in vet fees) and yesterday there were men and children wandering out of bushes clearly having just been to the toilet whilst 'enjoying a family bbq'. It's absolutely disgusting. Action requested Resume patrols and issue parking and litter fines to ALL rule breakers. You could pay for the rangers hours with the fines you collect. There is no excuse on the council's part.
709407	16/05/2025 11:44	Clifton and Durdham Downs	Everyday on the Downs there are tents, vans and cars parked illegally on the grass. There are also van dwellers using the green spaces as toilets and littering
709500	19/05/2025 10:25	Clifton and Durdham Downs	What happened: There have been caravans on the downs for weeks and they prevent me walking the dog and leave litter. Where did it happen: Downs opposite top of Avenue. When did it happen: They've been there for a month now
709570	20/05/2025 07:33	Clifton and Durdham Downs	Cars and fires on Downs. This will never be allowed to happen in a place like Richmond park or Hyde Park. Why will Bristol allow this?
709676	22/05/2025 07:05	Clifton and Durdham Downs	What happened: Caravan parked on grass in ladies mile. Several caravans parked further back from the road there too. Where did it happen: Ladies Mile, Vlifton Downs. When did it happen: 10/5/25, 6pm
709757	23/05/2025 11:41	Clifton and Durdham Downs	I am writing to express my grave concern as a local resident (Durdham Park) about the worsening situation on Durdham Downs, where a growing number of individuals are living in vans and caravans—often illegally—accompanied by an alarming rise in antisocial behaviour, environmental degradation, and public safety risks. Let me be absolutely clear: this is not a national issue about housing supply. This is a local issue—on your watch—that is damaging one of Bristol's most iconic public spaces and directly impacting the daily lives of your electorate.Environmental Damage and Public Health Risks: What was once a well-maintained and cherished green space is now blighted by overflowing waste, discarded furniture, human excrement, and burned-out vehicles. These are not isolated incidents; they are increasingly common, creating a health hazard and an eyesore for residents, dog walkers, and families alike. Antisocial Behaviour and Public Safety: We have witnessed public drug use, intimidation, noise disturbances, and even criminal activity—all of which have been under-reported and under-policed. The atmosphere on the Downs is deteriorating daily. Many residents no longer feel safe using this public land, and this is unacceptable. Neglect and Lack of Enforcement: Despite the clear powers available under Bristol City Council's own "Managing Unauthorised Encampments Policy" and relevant bylaws relating to overnight parking, waste disposal, and antisocial behaviour, the council's response has been passive and ineffective. The council appears, frankly, asleep at the wheel while the situation worsens by the day. What Must Happen Now. I urge you, as elected representatives of this city, to take immediate and visible action. Specifically, I ask that you: 1 Enforce existing bylaws against overnight parking and long-term occupation of public land. 2.Treat this as a high-impact unauthorised encampment and initiate removal proceedings. 3.Increase police and enforcement presence on the Downs. 4.Reassure residents through direct communication about steps being taken. This is not a matter for long-term studies or excuses about national housing shortages. It is a local public order issue that requires leadership and decisive action now. If you continue to allow the Downs to be degraded in this way, it will be a lasting failure of your duty to protect Bristol's public assets and the wellbeing of its citizens. Residents expect to see tangible action from you our elected representatives within days, not years.
709837	24/05/2025 21:32	Clifton and Durdham Downs	What happened: On the Downs near the Ladies Mile end of the Circular road there is an encampment of a number of people living there for a number of days with tents and an open fire. Where did it happen: On the Downs near the Ladies Mile end of the Circular road When did it happen: Over the past several days, including 15-18 May 2025
709840	24/05/2025 21:42	Clifton and Durdham Downs	What happened: there is a permanent encampment on the grass on the Downs on the corner of the Circular Road near where people do bird-watching Where did it happen: it is on the corner of the Circular Road near where people do bird-watching When did it happen: it has been there since at least 03/05/2025 and it is still there on 24/05/2025
709848	25/05/2025 10:53	Ladies Mile	Vandalism to memorial bench which is visible from the path up from the zoo The front slat of the seat has been torn off and used to light a fire in front of the bench. This is the second time this bench (dedicated to my late husband Victor P. Snaith) has been vandalised (previously in 2023). fyi there is a large encampment of white van dwellers behind and beside the bench. The damage has been done since Sunday 18th May ie in the past week
710006	28/05/2025 15:55	Clifton and Durdham Downs	travellers are driving across the downs from the zoo to their encampment. Dangerous, reckless
710007	28/05/2025 16:01	Clifton and Durdham Downs	4 tent dwellers, been there for 6 weeks. Lighting fires on grass area. Van they use parked in 'pull in' by tents
710291	04/06/2025 14:33	Clifton and Durdham Downs	What happened: There is a large encampment on the Downs with many vehicles having driven over the grass and they are parked up camping overnight. Where did it happen: Bristol Downs between Ladies Mile and A4176. When did it happen: 24/05/2025
710401	06/06/2025 18:51	Ladies Mile	Van has exceeded the 5 hour parking limit & needs to be towed. This van has exceeded the 5 hour parking limit as it has been there all day & so now needs to be towed.
710449	08/06/2025 11:45	Ladies Mile	Car and vehicles on Downs. Flytipping from last weekend still present. New encampment of caravans on this area of the downs. Volleyball club having a BBQ and volleyball party and have parked their 3-4 cars on the Downs between Ladies Mile and A4175 above Zoo. Surely this recurrent issue needs to be nipped in the bud early as when one person sees another getting away with it they assume it's acceptable behavior and copy them?
710586	10/06/2025 13:28	Circular Road	Van parked on grass also has no mot. Illegally parked on path with no mot
710627	11/06/2025 09:12	Clifton and Durdham Downs	Can you fix the problem with the caravans on the Downs please? They are ruining this green space by making it inaccessible, hostile, threatening as well as heath and safety concerns with toileting in the bushes, open drug taking and risk of fire with so many gas canisters and flammables
710631	11/06/2025 09:57	Clifton and Durdham Downs	What happened: As you are well aware, the Downs has and is being used as a free for all camp site. Rubbish everywhere, bylaws being ignored, no obvious effort being made to enforce these laws. The caravans, trailers, horse boxes, coaches, vans, cars parked illegally on the roads and on the parkland are seemingly left to get on with whatever distruction and anti social behaviour they choose. The people of Bristol are heartbroken to see the demise of a once shared and much loved green space. It has been left to the residence to try to sort it out. This is now National news. Why on earth aren't the council listening to its residents? Where did it happen: Bristol Downs When did it happen: Over years but rapidly becoming worse
710670	11/06/2025 17:44	Clifton and Durdham Downs	No category. Used roads. Group of caravans & cars have been parked u on grass for 2 weeks+. Associated litter building up. Appreciate that nearly the whole of the Downs is effectively a caravan site but this is actually on the grass & damaging the site. Please pass on to relevant section.
710707	12/06/2025 11:00	Clifton and Durdham Downs	What happened: There are an assortment of caravans and camper vans Parked on the Downs. Where did it happen: On the Downs adjacent to Ladies Mile. When did it happen: I have been reporting this since April this year.
710718	12/06/2025 12:47	Clifton and Durdham Downs	hat happened: The travellers on then Downs having a bonfire. Where did it happen: Durdham Downs old zoo car park.When did it happen: 6/6/25 at 18:00
710732	12/06/2025 15:28	Clifton and Durdham Downs	What happened: I just want to ad to the multiple complaints you will have received about the many Travellers who are parked currently between the Clifton Down workshop/garage and Ladies Mile. There seem to be far more than ever before - they are allowing their litter to spread widely across the area - they are defecating in the surrounding bushes - one of their children (probably around 7 yrs old) threw a stick at me as I ran on a path near where they are parked They should be expected to respect the rules, bye laws and public access to the Downs in the same way as they would presumably wish to be allowed to live their lives in peace and quiet . Where did it happen: as above . When did it happen: ongoing 2-3 weeks.
710744	12/06/2025 17:24	Clifton and Durdham Downs	What happened: The Downs are a disgrace, however the GAS CANNISTERS, are extremely dangerous. Where did it happen: All over the downs. When did it happen: All the time
711150	20/06/2025 12:42	Clifton Down	Path blocked by caravans. The walking and running route around the downs is blocked here by caravans.
711207	22/06/2025 01:41	Sea Walls Road	There are loads more travellers parking on the grass. Since Ladies Mile will be closed there are travellers now camping near seawalls. This is the one bit of the Downs without real problems (apart from boy racers and smoking weed that goes unchallenged anyway). Action has to be taken. There is now nowhere on the Downs for a family to enjoy themselves without issues and real cause for concern.
711259	24/06/2025 09:52	Clifton and Durdham Downs	Approx 30 Caravans appeared Friday,please can you update what is happening, they're also throwing huge amounts of Rubbish into the trees. Also are there plans to put up wooden fence posts in this area like you have done on Ladies Mile.
711512	27/06/2025 12:12	Clifton and Durdham Downs	Some caravans left yesterday, howvere some news ones have appeared overnight (these are new ones) there are around 12 of them , are there plans to do something longer term so this stops happening?
712129	08/07/2025 17:51	Clifton and Durdham Downs	What happened: Caravans parked on the Downs directly on the Grass which is a breach of byelaws. There have been protests about them parked overnight on the road but on the grass is a different. You cannot not move them when they go against laws set legally. They pose a threat to public safety. Theres maybe 20 caravans on the downs to the left of ladies mile. I'd be happy to tell you more. Where did it happen: Durham Downs, Bristol. When did it happen: 13:00 Thursday 26th June
712156	09/07/2025 10:27	Clifton and Durdham Downs	Breach forms recieved 26/06 (x2) Another group of travellers has not long arrived on the stretch of land between Ivywell Road and Seawalls Road on the Downs on the edge of Sneyd Park. Travellers had been here since Friday of last week but most have now left. A new group has arrived. Clealry, they are intending to park overnight for as long as possible. Where did it happen: See above. When did it happen: reporting this at 7.30 on 26th June 2025 I have just filled in another of these forms to report that a another group of travellers have now parked in that space on the Downs by Ivywell Road on Sneyd Park. There are about 10/12 additional motor homes. My next-door neighbour has also reported to the Police that around noon today 2 young children from the encampment were in his garden urinating. The lock on his garden gate had been broken and taken off. Following this 3 youngsters/teenagers from the encampment came into the garden and then opened the sliding door into his property. When they realised that he was in the room they ran away. He has reported the incident to the Police and has an incident number. The Police did not attend as my neighbour was concerned regarding repercussions if he did so. Clearly this is unacceptable behaviour and very worrying for all of us with gardens backing onto the Downs. Where did it happen: [redacted] When did it happen: Around noon today, 26th June 025

712157	09/07/2025 10:32	Clifton and Durdham Downs	This is not my first complaint about the Travellers who come onto the Downs and make camp in ever growing numbers. They have now moved from the site near the old zoo extra car parking space (where they have been for several days) and are now adjacent to the road directly next to Sea Walls. Already the rubbish is obvious and it is a hugely wind buffeted area and this will cause a potential hazard to vehicle drivers and pedestrians. It is an area where families visit the ice cream vans, tourists look over the landscape and people requiring toilet facilities are prevalent and it is just not acceptable that these people drive onto the grass, park their cars, caravans and business vehicles all over what had been a peaceful space, once used as a sculpture exhibition space. Permitted parking spaces by the roadside means that the road is already narrow. Clearly the distraction of this major encampment may add to confusion and lead to possible accidents. The Downs teams are having to clear up after these people only to have them laugh in their faces and 'thank' them for clearing up their rubbish. They must feel totally frustrated. Action requested 1. Thank the people who are clearing up so much domestic rubbish when they should be looking after other aspects of the Downs. 2. Get rid of the nuisance permanently either by evicting them immediately. 3. Introduce a programme of erecting posts, placing rocks or providing gates to prevent this happening. 4. Get the police to impound unregistered vehicles. 5. Fine these people for illegal parking, dropping rubbish and driving on the grass. This would be a start.

	Total	**Red text**	Percent red
Parks	42	17	40
GRT & NET	115	62	54
Formal Complair	21	6	29
	178	**85**	**48**

Red text - allegations of public nuisance and ASB including criminal behaviour, threatening behaviour, driving on the grass, using The Downs as a toilet, fires/BBQs, litter. NB Records to 10th July 2025

Enquiry Number	Date	Site Name	Description
707707	08/04/2025 15:28	Clifton and Durdham Downs	go to the top of pembroke road and take path opposite. Go past tower and bear to left. Go past compound and keep walking towards Ladies Mile. on left hand side approx 20 travellers vehicles arrived this morning.
707887	12/04/2025 13:04	Ladies Mile	Litter everywhere close to travellers' caravans. Litter strewn around the field, in bushes and on the grass close to a site of travellers. Patches of burnt grass with empty bottles and litter strewn around.
707989	15/04/2025 00:24	Upper Belgrave Road To Rockleaze Footpat	Broken glass. Lots of broken glass on the path by the travellers - main path so risk to children and dogs!
708092	16/04/2025 16:48	Clifton and Durdham Downs	approx 10 caravans have just driven onto the Downs, opposite Rockleaze, in between 2 footpaths
708209	19/04/2025 17:18	Upper Belgrave Road To Rockleaze Footpat	Several large piles of rubbish. Several large piles of rubbish left behind by the travellers.
708328	23/04/2025 11:10	Clifton and Durdham Downs	I also think this caravan is empty, so presumably you could also tow that away and scrap it.At the same time I noticed there were three encampments of gypsies on the downs. This is totally unacceptable and I consider it your role to have them removed, especially as we pay council tax to keep the city looking
708562	28/04/2025 17:21	Clifton and Durdham Downs	What happened: Driving over Clifton and Durham downs to reach large encampments both sides of Ladies' Mile. Also driving quad bikes on the grass. Where did it happen: Clifton and Durham Downs. When did it happen: I observed this behavior Friday April 11th and Thursday April 17th
708577	29/04/2025 08:04	Clifton and Durdham Downs	What happened: Large numbers of caravans & motor homes have arrived on the downs, one group has already moved on leaving large piles of rubbish & the other has positioned themselves in a way that they have created a space the size of 2 football pitches it feels uncomfortable to walk through. Where did it happen: Durdham downs. When did it happen: Ongoing
708578	29/04/2025 09:05	Clifton and Durdham Downs	What happened: Multiple cars and vans driving over and parking on Clifton Downs next to Ladies Mile. Where did it happen: On Clifton Downs next to Ladies Mile. When did it happen: 21 April 2025 at 6.15pm.
708580	29/04/2025 09:09	Clifton and Durdham Downs	What happened: The travellers who have parked up on the Downs appear to be chopping down some trees/bushes as there are piles of felled and chopped trees. Where did it happen: https://maps.app.goo.gl/14h56wzxzUNvdQgb6. When did it happen: seen 13:00 22/04/25
709134	12/05/2025 09:24	Ladies Mile	Illegally parked caravan in public park. It's wrong!! Needs to be discouraged.
709180	12/05/2025 15:35	Clifton and Durdham Downs	Breach of bye law - tents erected on the Downs and camping overnight. Also Fire and barbecues in use, and camping overnight and : Camping overnight in caravans. Gas canisters on Downs. Waste thrown in bushes. Breach of bye laws Where did it happen: Saville Road, circular road and ladies mile
709193	12/05/2025 16:51	Clifton and Durdham Downs	Damage to park structure or furniture, including life-saving equipment, Van dwellers on the Downs are chopping down trees I have photographic evidence, this was on 30/04/2025 09:54
709229	13/05/2025 10:53	Clifton and Durdham Downs	Complaint details Yesterday afternoon (27th April) there were in excess of 20 cars sporadically parked all over the Downs with BBQs roaring. It is not socially acceptable to drive and park on the grass like this, nor light BBQs (some of them gas!) so close to vegetation (that could catch fire). Nor is is acceptable for other Downs users, pets etc. The litter and waste is out of control. When I was young rangers used to patrol the Downs putting out bbq's as a deterrent. What's happened to any kind of law enforcement? A couple of Friday's ago, I saw the council had ticketed a car in a parking bay for presumably exceeding the 4 hour limit. Outrageous! When van dwellers can live in a bay without penalty, 'tree surgeons' can live on the Downs for weeks at a time leaving their waste behind them and anyone can drag a gas canister into the middle of dry vegetation and light a bbq for the afternoon. You HAVE to start using our council tax for one of the key purposes it was intended for and properly enforce usage and litter rules. My dog inadvertently ate human waste near one of the vans at the start of the year and suffered cannabis poisoning (over £600 in vet fees) and yesterday there were men and children wandering out of bushes clearly having just been to the toilet whilst 'enjoying a family bbq'. It's absolutely disgusting. Action requested Resume patrols and issue parking and litter fines to ALL rule breakers. You could pay for the rangers hours with the fines you collect. There is no excuse on the council's part.
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709500	19/05/2025 10:25	Clifton and Durdham Downs	What happened: There have been caravans on the downs for weeks and they prevent me walking the dog and leave litter. Where did it happen: Downs opposite top of Avenue. When did it happen: They've been there for a month now
709570	20/05/2025 07:33	Clifton and Durdham Downs	Cars and fires on Downs. This will never be allowed to happen in a place like Richmond park or Hyde Park. Why will Bristol allow this?
709676	22/05/2025 07:05	Clifton and Durdham Downs	What happened: Caravan parked on grass in ladies mile. Several caravans parked further back from the road there too. Where did it happen: Ladies Mile, Vlifton Downs. When did it happen: 10/5/25, 6pm
709757	23/05/2025 11:41	Clifton and Durdham Downs	I am writing to express my grave concern as a local resident (Durdham Park) about the worsening situation on Durdham Downs, where a growing number of individuals are living in vans and caravans—often illegally—accompanied by an alarming rise in antisocial behaviour, environmental degradation, and public safety risks. Let me be absolutely clear: this is not a national issue about housing supply. This is a local issue—on your watch—that is damaging one of Bristol's most iconic public spaces and directly impacting the daily lives of your electorate.Environmental Damage and Public Health Risks: What was once a well-maintained and cherished green space is now blighted by overflowing waste, discarded furniture, human excrement, and burned-out vehicles. These are not isolated incidents; they are increasingly common, creating a health hazard and an eyesore for residents, dog walkers, and families alike. Antisocial Behaviour and Public Safety: We have witnessed public drug use, intimidation, noise disturbances, and even criminal activity—all of which have been under-reported and under-policed. The atmosphere on the Downs is deteriorating daily. Many residents no longer feel safe using this public land, and this is unacceptable. Neglect and Lack of Enforcement: Despite the clear powers available under Bristol City Council's own "Managing Unauthorised Encampments Policy" and relevant bylaws relating to overnight parking, waste disposal, and antisocial behaviour, the council's response has been passive and ineffective. The council appears, frankly, asleep at the wheel while the situation worsens by the day. What Must Happen Now. I urge you, as elected representatives of this city, to take immediate and visible action. Specifically, I ask that you: 1 Enforce existing bylaws against overnight parking and long-term occupation of public land. 2.Treat this as a high-impact unauthorised encampment and initiate removal proceedings. 3.Increase police and enforcement presence on the Downs. 4.Reassure residents through direct communication about steps being taken. This is not a matter for long-term studies or excuses about national housing shortages. It is a local public order issue that requires leadership and decisive action now. If you continue to allow the Downs to be degraded in this way, it will be a lasting failure of your duty to protect Bristol's public assets and the wellbeing of its citizens. Residents expect to see tangible action from you our elected representatives within days, not years.
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710707	12/06/2025 11:00	Clifton and Durdham Downs	What happened: There are an assortment of caravans and camper vans Parked on the Downs. Where did it happen: On the Downs adjacent to Ladies Mile. When did it happen: I have been reporting this since April this year.
710718	12/06/2025 12:47	Clifton and Durdham Downs	hat happened: The travellers on then Downs having a bonfire. Where did it happen: Durdham Downs old zoo car park.When did it happen: 6/6/25 at 18:00
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711512	27/06/2025 12:12	Clifton and Durdham Downs	Some caravans left yesterday, howvere some news ones have appeared overnight (these are new ones) there are around 12 of them , are there plans to do something longer term so this stops happening?
712129	08/07/2025 17:51	Clifton and Durdham Downs	What happened: Caravans parked on the Downs directly on the Grass which is a breach of byelaws. There have been protests about them parked overnight on the road but on the grass is a different. You cannot not move them when they go against laws set legally. They pose a threat to public safety. Theres maybe 20 caravans on the downs to the left of ladies mile. I'd be happy to tell you more. Where did it happen: Durham Downs, Bristol. When did it happen: 13:00 Thursday 26th June
712156	09/07/2025 10:27	Clifton and Durdham Downs	Breach forms recieved 26/06 (x2) Another group of travellers has not long arrived on the stretch of land between Ivywell Road and Seawalls Road on the Downs on the edge of Sneyd Park. Travellers had been here since Friday of last week but most have now left. A new group has arrived. Clealry, they are intending to park overnight for as long as possible. Where did it happen: See above. When did it happen: reporting this at 7.30 on 26th June 2025 I have just filled in another of these forms to report that a another group of travellers have now parked in that space on the Downs by Ivywell Road on Sneyd Park. There are about 10/12 additional motor homes. My next-door neighbour has also reported to the Police that around noon today 2 young children from the encampment were in his garden urinating. The lock on his garden gate had been broken and taken off. Following this 3 youngsters/teenagers from the encampment came into the garden and then opened the sliding door into his property. When they realised that he was in the room they ran away. He has reported the incident to the Police and has an incident number. The Police did not attend as my neighbour was concerned regarding repercussions if he did so. Clearly this is unacceptable behaviour and very worrying for all of us with gardens backing onto the Downs. Where did it happen: [redacted] When did it happen: Around noon today, 26th June 025

712157	09/07/2025 10:32	Clifton and Durdham Downs	This is not my first complaint about the Travellers who come onto the Downs and make camp in ever growing numbers. They have now moved from the site near the old zoo extra car parking space (where they have been for several days) and are now adjacent to the road directly next to Sea Walls. Already the rubbish is obvious and it is a hugely wind buffeted area and this will cause a potential hazard to vehicle drivers and pedestrians. It is an area where families visit the ice cream vans, tourists look over the landscape and people requiring toilet facilities are prevalent and it is just not acceptable that these people drive onto the grass, park their cars, caravans and business vehicles all over what had been a peaceful space, once used as a sculpture exhibition space. Permitted parking spaces by the roadside means that the road is already narrow. Clearly the distraction of this major encampment may add to confusion and lead to possible accidents. The Downs teams are having to clear up after these people only to have them laugh in their faces and 'thank' them for clearing up their rubbish. They must feel totally frustrated. Action requested 1. Thank the people who are clearing up so much domestic rubbish when they should be looking after other aspects of the Downs. 2. Get rid of the nuisance permanently either by evicting them immediately. 3. Introduce a programme of erecting posts, placing rocks or providing gates to prevent this happening. 4. Get the police to impound unregistered vehicles. 5. Fine these people for illegal parking, dropping rubbish and driving on the grass. This would be a start.

	Total	**Red text**	Percent red
Parks	42	17	40
GRT & NET	115	62	54
Formal Complair	21	6	29
	178	**85**	**48**

On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE03
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendants

EXHIBIT CE03

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1. Funderworld

- **Notes / issues 2025**
  Travellers set up behind the site by the water tower, Fair organisers went and spoke to them in 2025 and they moved on, fair organiser concerned about being associated with them.

- **Additional costs**
  2025 £ for additional staff / security

2. Winestock

- **Notes / issues 2024**
  2024 - theft of stock, asb (kids on motorbikes). Police called. From de-brief - 'Had 3 attempted break ins and 2 actual, Saturday very early morning and attacked security guard nothing stolen, Sunday evening 9pm 2nd time broke fence behind bar and stole wine and was seen and attempted to stop Security stopped some, 4 cars involved Police called

- 2025 – no issues reported with travellers.

- **Additional costs**
  2025 £ for additional staff / security and fencing costs.

3. Bristol Race for Life & Pretty Muddy

Issues experienced 2023

- Travellers had moved onto the Downs on the Thursday evening, Organiser was swiftly notified by Ben Skuse with great communications about the potential impact, Ben swiftly served eviction papers for 21 days and notified all parties
- Organiser additionally notified all parties involved also and notified Avon & Somerset Constabulary
- Organiser meet with Ben promptly the next morning to have pre-event site sign off, where Organiser then was made aware of the current impact and size of disruption, upon arriving on-site I realised quickly that if they were to remain in situ this would mean moving the event site & course/ Event Cancellation
- By Friday Evening at 22:00pm, more travellers had moved onto The Downs in a separate location further onto Clifton Downs
- By Saturday afternoon at 14:30pm, more travellers had moved onto Durdham Downs in a separate location

- For the Duration of the event there were 3x Separate parties of travellers on-site on our planned event site and course route

Issues experienced 2025

- Travellers on-site and sharing the site with Lady Boys of Bangkok meaning Organiser no contingency site compared to contingency course route 2023 to avoid traveller common locations due to second event.
- Organiser additionally notified all parties involved also and notified Avon & Somerset Constabulary as they were unaware
- Organiser called 101/999 on Friday to ask if any additional support was available across our LIVE event times and if they might be able to send a unit to have a discussion around vehicle movement and travelling at speed on grass areas.
- Travellers moved from one location to a more troublesome location further putting the event safety at risk

Travellers Disruption & Anti-Social Behaviour – all years

- Continuous Unauthorised vehicle movement – during a strict vehicle curfew and implemented Road Closures causing hazard to public safety, including children driving illegally and speeding
- Driving through Road Closure's at speed, knocking down cones and signs, nearly causing injury to Traffic Management staff
- Alleged theft of CRUK Equipment
- Use of privately organised waste bins for rubbish dumping
- Causing public nuisance to participants, using threating behaviours to participants
- Intimidation to Staff, participants, and volunteers
- ASB/ intimidating behaviour/ defaecating in the bushes/ fly tipping/ littering/ parking and driving on the grass by the travellers and people in tents. Travellers impact this event hugely. In 2023 and 2025 the safety of the event was comprised, and the costs of stewarding increased significantly. This year the event was in jeopardy until it was delivered with hundreds of travellers on site and the Event Manager needing to liaise with the council, police, bailiffs, and stewards, making decisions about the course and safety until the last moment. Every year the traveller situation is unknown until days before, or the day of, the event and anti-social behaviour and the safety of the team and the supporters is a big concern and responsibility to the Organisers. They have increased steward provisions, and incurred additional costs over the years and now pay an additional £16,000 in steward costs every year adding on more provision. Every steward is now SIA, they have cover for day before set-up and teams on course to protect staff from safety from threats. They also now have to double up staff roles so no-one must be out on the course alone. The Organiser has become uncomfortable with the level of jeopardy we are working in with this event, the responsibility on the event and additional costs incurred to make the event happen in very difficult circumstances is becoming unworkable – the Organiser is now discussing other sites to move the event to in 2026.

  The impact and additional spend using the Downs in the future would also now impact on these additional costs, meaning that year on year this event is likely to cost so much more to put on safely in comparison to previous years. The impact of the continuous fire fighting for the event was monumental , the additional hours worked and documentation reproduced/ extra communications, changes, additional details is hard to put into words the impact of this additional workload due to these issues.

  Moving forward we need to account for these issues on a much larger scale to ensure safety and it's becoming astronomical to deliver this event in this location due to the impact of travellers and van dwelling community.

Additional Cost

2025 - Appoximately £48,000 for additional security, additional Traffic Management Staff required.

4. Bristol Pride

Issues experienced 2023

- Wednesday day before the event: Security threatened by group of people shouting homophobic abuse and saying they'd return later that night.
- A break in at the Bristol Pride compound during the build Wednesday night - £50k worth of hired kit stolen.
- Staff lost a day working with team to improve security, rehiring kit, speaking to insurance company etc.
- The power team lost a whole day as they needed to work out what kit had been stolen, and then had to find someone else to hire them the kit they needed to replace the stolen stuff. They then had to bring in additional crew to ensure it was delivered in time.

No issues experienced in 2025 as the travellers had been evicted from site prior to the event starting.

Additional Cost

£11,000 in costs in 2023 for additional Security, extra crew members and to cover the costs of lost equipment.
£0 for 2025 as the travellers were not present.

5. Adventure Cinema

Issues experienced 2022

Thursday 4th August - Arrive on site to discover traveller camp is set up 100m away from event site. No incidents through the day.

Friday 5th August - Return on site and find some of the heras scrim (branded wrap on the fence) has been slashed and reports from the overnight security that children from the camp have been jumping the fence and running around in the event site. When security got close to them they would shout 'you can't touch me, if you touch me I'll have you done'.

12pm - Event opens. Very shortly after members of public arrive there are up to 15 children from the camp that have jumped the fence and are running around, annoying members of public, stealing food from the traders, and accessing our back-of-house areas. We positioned security near essential infrastructure e.g the generator. We had 6 SIA trained security on site which is a lot for an event of this size but they were unable to do anything as they would not physically remove the children from the event site so as to not worsen the situation with the adults from the camp. Our event team gave the children some seats and popcorn to sit at the back of the crowd hoping that this would calm the situation, but shortly after this they continued to run around and we started getting reports of them stealing from members of public. We then had a report that one of the kids punched one of our customers children.
By this point the police had been called by Ben from the parks team (incident number AS-20220805-0484) and the team again asked the children to leave, warning them that the police were coming. At this point the children left and returned with some adults from the camp who appeared to be two of

their mothers. The adults started screaming that someone on our site had punched one of their children (this is incorrect, it was the other way around). She then barged past security in the middle of the movie and confronted the customer. The event manager told her she had to leave and she threatened to kill the customer on the way out. She then spent the rest of the movie waiting by the gate. We spoke to the customer who was frightened and was protecting her child and arranged for one of her friends to bring her car to the emergency exit after the movie. She was ushered out safely.

The kids spent the whole time tipping bins, stealing from reception and vendors, stealing from customers, attempting to break our equipment and promising that all our site would be destroyed that night.

Our team spent the rest of the day packing all of our equipment away and left that night. We paid the security team to remain on site with the hired infrastructure (fence, toilets, bins) until Monday.

8/8/22 email to Site Permissions: “What a nightmare that was on the weekend! We were hugely disappointed to have to cancel the shows and very angry at those who caused it to happen. It has obviously also had huge financial implications, with us losing around £30,000.”

Additional costs
£30,000 loss to organiser after having to cancel performances and reputational damage

Police Call Card Number.	Date of Offence.	Brief detail of report.
AS-20220730-0501	30/07/2022	Reports of 4 caravans set up on The Downs.
AS-20220730-0501	02/08/2022	Reports of 20 caravans set up on The Downs.
AS-20220802-0810	02/08/2022	Reports that a member of the travelling community has called a member of public a 'GAY FAIRY BOY' (they identify as non-binary)
AS-20220802-1100	02/08/2022	Reports of youths from the travelling community calling a member of public a paedophile and showing knives to them.
AS-20220803-0940	03/08/2022	Reports of youths from the travelling community riding around on a quad bike around a fitness group who were engaged in physical activity. Reports also stating they tried to take a dog off an 11 year old boy.
AS-20220803-1104	03/08/2022	Reports of an assault, whereby youths from the travelling community has stolen a frisbee and then spat at a member of public when they have tried to retrieve this back. Frisbee has been recovered.
AS-20220804-0249	04/08/2022	Reports of the unauthorised encampment being at the location.
AS-20220804-1132	04/08/2022	Reports that members of the travelling community driving behind a female runner.
AS-20220805-0484	05/08/2022	Reports of the travelling community trespassing into the outdoor cinema and stealing things from members of public.
AS-20220807-0603	05/08/2022	Reports of an unprovoked dog bite from one of the dogs at the unauthorised encampment. no adult supervision at time of bite.
AS-20220807-0613	06/08/2022	Reports of members of the travelling community shouting abuse towards a member of public and trying to kick their dog.

On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE04
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendants

EXHIBIT CE04

From: [redacted]
To:
Subject: Bristol RFL & PM | Traveller"s Report
Date: 09 July 2025 21:07:40
Attachments: image001.png
image002.png
Image 2.jpeg
Image.jpeg
Importance: High

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

Hello,

I hope you are well and having a lovely week, I have put something together below, however if you do feel like there is information missing and would like me to elaborate further please do let me know, as there is likely to be significant detail I may have missed.

I just wanted to pull together an email outlining some of the issues we faced this year during our Hire Period of The Downs this year and in previous years, as you are aware this relationship is on-going for many years and of course we are currently in line with our terms and conditions and contract;

Some issues that we faced this year were of course due to the open nature of the land, our events are of course open to all, meaning they are not ticketed/ closed cap events;

Travellers On-site

Notes below from 2023;

- Travellers had moved onto the Downs on the Thursday evening, I was swiftly notified by Ben Skuse with great communications about the potential impact, Ben swiftly served eviction papers for 21 days and notified all parties
- I additionally notified all parties involved also and notified Avon & Somerset Constabulary
- I meet with Ben promptly the next morning to have pre-event site sign off, where I then was made aware of the current impact and size of disruption, upon arriving on-site I realised quickly that if they were to remain in situ this would mean moving the event site & course/ Event Cancellation
- By Friday Evening at 22:00pm, more travellers had moved onto The Downs in a separate location further onto Clifton Downs
- By Saturday afternoon at 14:30pm, more travellers had moved onto Durdham Downs in a separate location
- For the Duration of the event there were 3x Separate parties of travellers on-site on our

planned event site and course route

Notes from 2024 & 2025;

- Travellers on-site and sharing the site with Lady Boys of Bangkok meaning we have been hosting this event with a contingency site & contingency course route since 2023 to avoid traveller common locations
- I additionally notified all parties involved also and notified Avon & Somerset Constabulary as they were unaware
- I called 101/999 on Friday to ask if any additional support was available across our LIVE event times and if they might be able to send a unit to have a discussion around vehicle movement and travelling at speed on grass areas.
- Travellers moved from one location to a more troublesome location further putting the event safety at risk

Of course most of the above you are aware off as I cc'd most communications to you and suppliers for the event, On Friday I did take the decision to create a set of contingency plans to do my best to avoid the groups in all circumstances, making a final call on the Saturday morning at 05:00am to decide the fate of the event and impact the travellers may or may not have on the event itself.

The Call I made on Saturday morning was that the event would go ahead as planned in contingency using the contingency site and course route.

Travellers Disruption & Anti-Social Behaviour

- Continuous Unauthorised vehicle movement – during a strict vehicle curfew and implemented **Road Closures** causing hazard to public safety, including children driving illegally and speeding
- Driving through Road Closure's at speed, knocking down cones and signs, nearly causing injury to Traffic Management staff
- Theft of CRUK Equipment
- Use of privately organised waste bins (see pictures attached)
- Causing public nuisance to participants, using threating behaviours to participants
- Intimidation to Staff, participants, and volunteers
- ASB/ intimidating behaviour/ defaecating in the bushes/ fly tipping/ littering/ parking and driving on the grass by the travellers and people in tents.
- Travellers impact this event hugely. In 2023 and 2025 the safety of the event was comprised, and the costs of stewarding increased significantly. This year the event was in jeopardy until it was delivered with hundreds of travellers on site and the Event Manager needing to liaise with the council, police, bailiffs, and stewards, making decisions about the course and safety until the last moment. Every year the traveller situation is unknown until days before, or the day of, the event and anti-social behaviour and the safety of our team and the supporters is a big concern and responsibility. We

have increased steward provision, and in turn cost, massively over the years and now pay £16,000 in steward costs, every year adding on more provision. Every steward is now SIA, we have cover for day before set-up and teams on course to protect our staff and supporters from any threat. We also double up staff roles so no-one must be out on course alone.

- I have become uncomfortable with the level of jeopardy we are working in with this event, the responsibility on the event manager and the cost we are paying to make the event happen in very difficult circumstances.

The Downs

- It is usually a beautiful site, clean and tidy and always looks the part (minus van dwellers and travellers)
- Threat to future use, due to impact of travellers and site accessibility & Safety
- Exploration of other Bristol venues/ spaces to accommodate a venue and event this size

Additional Cost and Impact

- Additional security personnel required on Saturday night increased by 4x Staff
- Additional security personnel required on event Day on Sunday increased by 6x Staff
- Additional Traffic Management Staff to man Road Closures/ help with unauthorised vehicle movement increased by 4x Staff
- We are having to increase this provision year on year.

Cost: £48,000 in divisional costs to deliver Bristol this is additional cost on top of the build costs of the event infrastructure, I believe this is the most expensive CRUK event in the UK outside of London.
Venue hire: £9,000
Steward costs: £16,000
TM costs: £5,000

The impact and additional spend using the Downs in the future would also now impact on these additional highlighted costs, meaning that year on year this event is likely to cost so much more to put on safely in comparison to previous years.

The impact of the continuous fire fighting for the event was monumental and for myself as the event manager the additional hours worked and documentation reproduced/ extra communications, changes, additional details is hard to put into words the impact of this additional workload.

I am also aware that in future years it's likely that most of the above issues would crop up again and again, however moving forward we need to account for that on a much larger scale to ensure safety and it's becoming astronomical to deliver this event in this location due to the impact of travellers and van dwelling community.

However, this is certainly something I wish to flag for future events including our own events, it would be great to be assured that this wouldn't happen again in future years, however I am also acutely aware that this is something beyond control at this moment in time.

We are of course aware that many of these issues are due to the unknown nature and risk of the traveller community, on this occasion and previous occasions it unfortunately felt as though this was of detriment to our event.

Aside from the above issues I can't stress enough the impact and great response from Ben, Sandra & Caroline and the team on-site and Avon & Somerset Constabulary throughout the weekend. Any moment to help and assist me with anything, they help. Their service and help and support for our event year on year is absolutely second to none and with every issue listed above the team jumped at every chance to help me, come up with solutions and fix problems. A truly brilliant and excellent team who ensure the service provided when hiring the site is just outstanding I couldn't be more thankful to them for looking after us so well, working with the Bristol City Council team is brilliant, I found myself with instant support on Friday from standing on the Downs attempting to plan the next move, adapted licenses, site moves, course moves, I couldn't have been more supported by the team so Thank you.

I would be more than happy to discuss any of the above issues or pop in also if that be more suitable of course,

Appreciate your time and patience for taking this onboard & look forward to hearing from you further.

Thank you

Best Wishes

Sophie

[redacted]

[redacted]

Cancer Research UK, 2 Redman Place, London E20 1JQ

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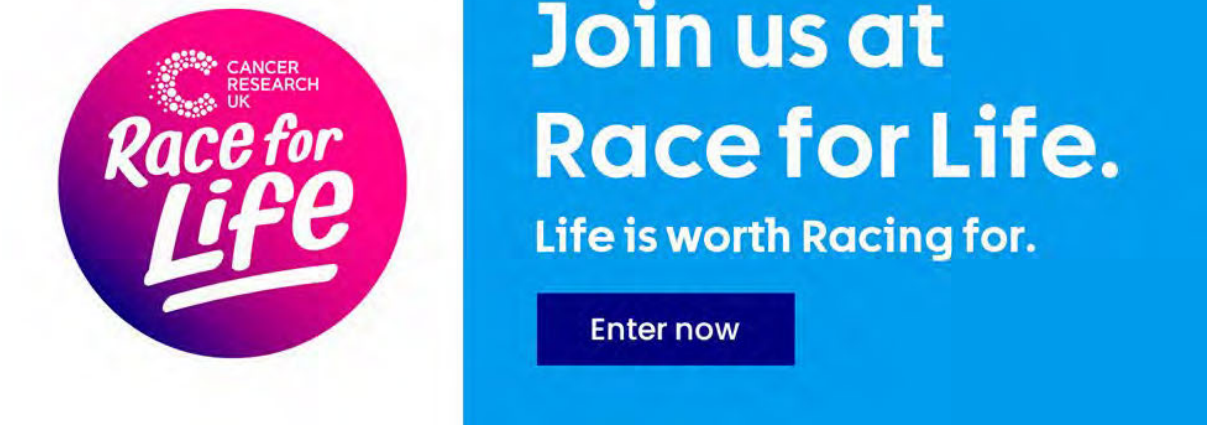
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On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE05
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendants

EXHIBIT CE05

Managing Clifton Down: its role in the Avon Gorge ecological network

A Human Impact Assessment

Author: Anna Stevens MSc

1. Introduction and context

Clifton Down forms a critical component of the green infrastructure of Bristol, offering both recreational space for the public and essential ecological services. It borders the Avon Gorge, which has been designated as a Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI) due to its unique limestone habitat, geological formations, and most significantly presence of rare flora and fauna (JNCC, 2025; Natural England, 2015). The Avon Gorge is renowned for its biodiversity, including five endemic species of tree which are not found elsewhere in the world.





Figure 1. Views of the Avon Gorge Gully in proximity to the calcareous grassland of Clifton Down

In recent years, particularly since 2020, Clifton Down has experienced an exponential rise in human activity, much of which falls outside traditional recreational uses (Westlake, 2024). This includes van dwellers establishing semi-permanent residences, increased littering, and other unsanctioned activities such as fires and tent camping (Bristol City Council, 2024). These pressures have prompted concerns among conservationists about the long-term

ecological sustainability of Clifton Down and its vital role in supporting the Avon Gorge's ecological network (Natural England, 2019).



Figure 2. Van dwellers on grassy verge, tents in woodland, cars on greensward, families barbecuing on Clifton Down.

This study seeks to determine whether Clifton Down's ecological integrity is compromised by human impacts, and whether such ecological degradation affects the reproduction and survival of key rare species in the Avon Gorge. The study also aims to inform the policy and management decisions of ongoing Downs Committee custodianship of the site, and the development of a ten-year management plan by the Avon Gorge and Downs Wildlife (AGDW) steering group which oversees conservation efforts on these sites.

2. Focal rare species and their ecological importance

The Avon Gorge hosts an exceptional diversity of plant life, including several species from the *Sorbus* genus which are endangered or critically endangered. These include *Sorbus whiteana* and *Sorbus wilmottiana*, both of which are triploid and reproduce via apomixis, but still require pollinators for successful seed formation (Robertson *et al.,* 2010). The presence and health of these species are vital not only for local intrinsic biodiversity value but also for maintaining the SAC conservation status of the Avon Gorge (JNCC, 2025).

Another significant rare species is *Allium sphaerocephalon*, commonly known as the Bristol onion, which is specific to the Avon Gorge in England and similarly depends on pollinators for its reproduction. The survival of these key species is directly linked to the health of their pollinator populations, which are affected by habitat quality and connectivity.



Figure 3. *Sorbus wilmottiana*



Figure 4. *Allium sphaerocephalon*

Pollinators, such as the honeybee (*Apis mellifera*), the common carder bee (*Bombus pascuorum*), the orange-tailed mining bee (*Andrena haemorrhoa*) and various hoverflies like *Episyrphus balteatus*, play a critical role in maintaining the reproductive cycles of these plants. Their ability to move between Clifton Down and the Avon Gorge enables pollinators to forage at both sites and be available to pollinate key rare species, supporting the genetic diversity and resilience of these rare plant populations (Memmott, 1999; Waser *et al*., 1996).



Figure 5. *Apis mellifera*



Figure 6. *Andrena haemorrhoa*



Figure 7. *Bombus pascuorum*

3. Impact of human activities on habitat quality

Human activities on Clifton Down have increased significantly over the past four years, with notable environmental consequences. Activities such as van dwelling, fires and barbecues, dumping of litter and driving on greensward lead to several forms of ecological degradation:

- **Soil compaction**: vehicles and excessive foot tread compress soil, reducing its aeration and water infiltration capacity, adversely affecting root growth (Rakkar and Blanco-Canqui, 2018).
- **Nutrient loading**: waste from humans and dogs introduces high levels of nitrogen and phosphorus, which can shift plant communities towards species less beneficial to pollinators (De Frenne *et al*., 2021; Harder *et al.,* 2019).
- **Invasive species**: fly-tipping promotes the spread of invasive plant species like *Prunus laurocerasus*, which outcompete native flora (Skuse, 2024).
- **Direct damage**: fires destroy vegetation and alter soil chemistry, whilst litter can physically harm wildlife or introduce toxins into the ecosystem (Applied Earth Sciences, 2024; Johnson *et al*., 2024; Kolenda *et al*., 2011).



Figure 8. Litter and fire damage, human faeces, fly tipping of garden waste, nappies in trees on Clifton Down.

4. Methodology and data analysis

The research methodology involved detailed field surveys conducted over a four-week period during the peak pollination season. Clifton Down was divided into strata based on habitat type (calcareous grassland and scrub) and human impact level (high and low). Randomly selected 2x2m plots within each stratum were surveyed for pollinator activity, plant species, and environmental conditions such as temperature and time of day.

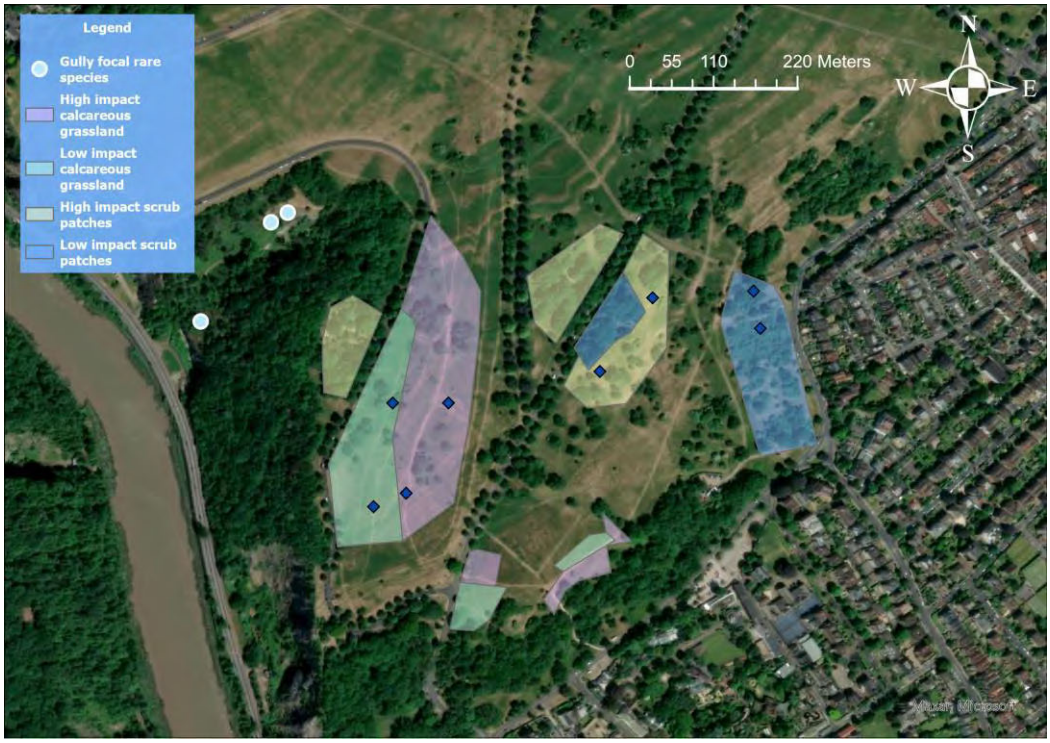


Figure 9. Clifton Down survey strata and sampling plots.

Results show that human activity impacts collectively reduce the ecological quality of Clifton Down, making it less supportive of diverse plant and in particular, pollinator populations. High human impact zones show a stark contrast in pollinator diversity, and therefore ecological health, when compared with areas with low human impact. These results are displayed visually in figures 10, 11, 12.

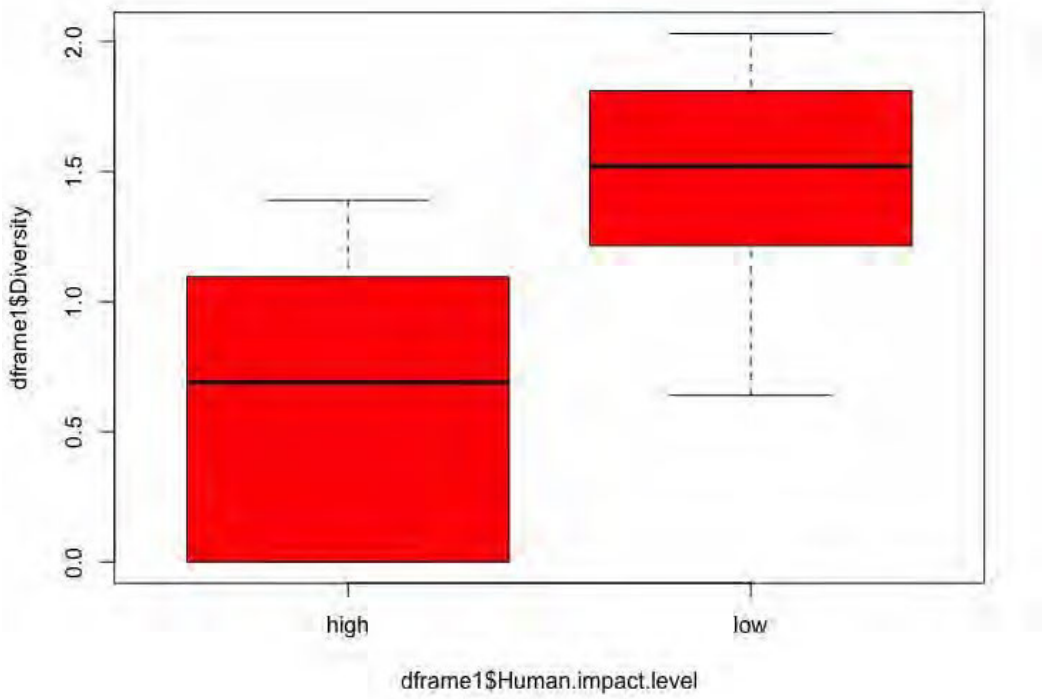


Figure 10. Significance of human impact level effect on pollinator diversity.

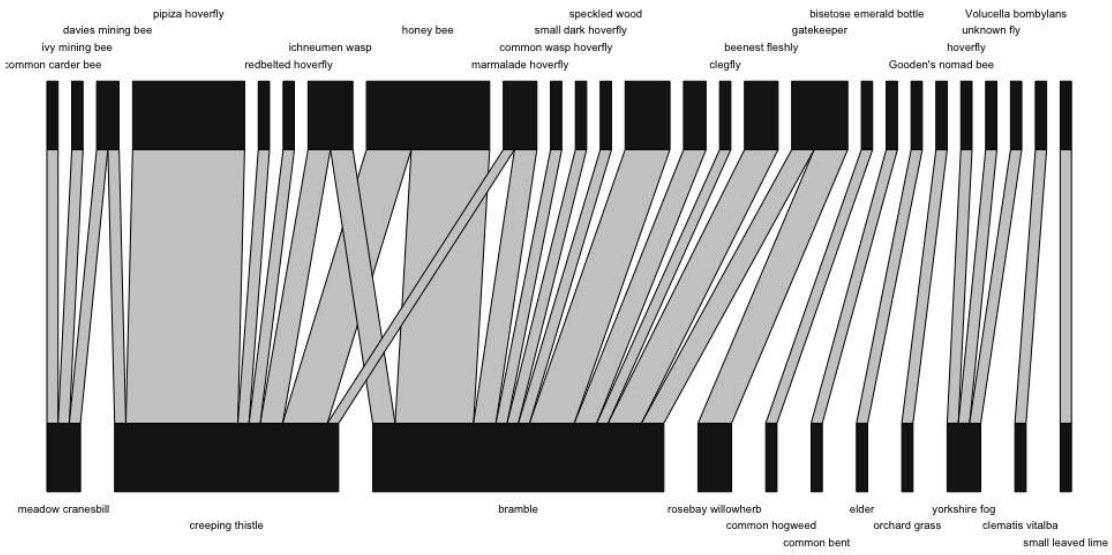


Figure 11. Low impact scrub patches stratum pollination web.

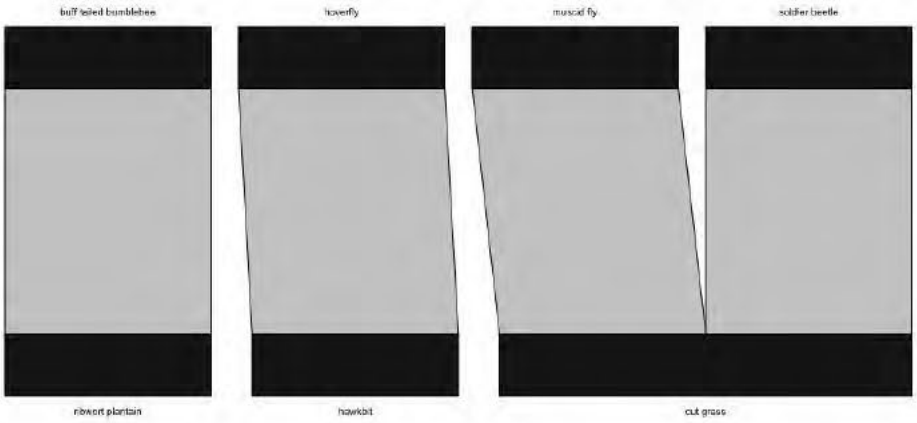


Figure 12. High impact scrub patches stratum pollination web.

Pollinator diversity was quantified using Shannon's Diversity Index, which accounts for both species richness and evenness (Wen *et al.*, 2021). A General Linear Model (GLM) was employed to assess the statistical significance of human impact, habitat type, and temperature on pollinator diversity. The model demonstrated that human impact was a highly significant factor which negatively influenced pollinator diversity (denoted by a p value of <0.001***); in other words the likelihood of the human impact results being due to chance were less than 0.1%. Temperature and habitat type also played a role but to a less significant extent.

Table 1. Difference, standard error and P-value for variables affecting pollinator diversity on Clifton Down.

Model term	t-value	Estimate mean effect	Standard error	Degrees of freedom	P-value
Human impact[1]	6.683	0.95527	0.14293	1	< 0.001***
Habitat[2]	-2.446	-0.34145	0.13960	1	< 0.05*
Temperature[3]	3.062	0.07671	0.025	1	< 0.01**

[1]Categorical effect (low, high); reference category was low human impact.
[2]Categorical effect (scrub, grassland); reference category was scrub.
[3]Increase of 1°C.

Additionally, the foraging ranges of key pollinators recorded at both sites were mapped using ArcGIS, confirming that pollinators from Clifton Down can and do travel to the Avon Gorge rare species, thereby facilitating critical ecological processes such as pollination of *Sorbus whiteana* and *wilmottiana,* and *Allium sphaerocephalon*.



Figure 13. Foraging range for *A. haemorrhoa* (300m) from low impact grassland stratum.



Figure 14. Foraging range for *A. mellifera* (600m) from high impact grassland stratum.



Figure 15. Foraging range for *B. pascuorum* (312m) from low impact scrub stratum (highlighted).

5. Ecological connectivity and conservation implications

The study emphasizes the critical ecological connectivity between Clifton Down and the Avon Gorge. Pollinators, as vectors of plant reproduction, bridge these habitats, supporting species across both sites (figures 13-15). Mapping of pollinator foraging distances revealed that species such as *Bombus pascuorum, Andrena haemorrhoa* and *Apis mellifera* regularly move between Clifton Down and the Avon Gorge, reinforcing the fact that Clifton Down serves as a vital source of ecological support for the Avon Gorge's sensitive environments.

This interdependence aligns with the 'landscape-scale' approach to conservation, where the health of adjacent habitats is considered crucial for the viability of protected areas (Lawton *et al*., 2010). Any degradation at Clifton Down, therefore, is highly likely to have a direct impact on the Avon Gorge, particularly concerning the reproduction of *Sorbus* and *Allium sphaerocephalon* species. The potential loss of pollinator populations due to human impact on Clifton Down poses a significant threat to these species, which in turn could jeopardise the Avon Gorge's SAC and SSSI statuses, as these are significantly related to the presence of these rare plants species. Any such loss of designations will have an impact on the city's status. Without these contributing to its overall appeal, Bristol may become a less favoured city: to live in, leading to economic instability; for tourists to visit, leading to a lack of income; and for business to establish and invest in, leading to loss of financial investment.

6. Recommendations for Management

To safeguard the ecological integrity of Clifton Down and its role in supporting the Avon Gorge, the following management strategies are recommended to be implemented as soon as possible:

1. **Enforcement of Byelaws**: increase the enforcement of existing byelaws to prevent activities such as unauthorised camping, fires, litter dumping and off-road vehicle use through patrols. Consider imposing fines.

2. **Habitat Restoration**: implement targeted habitat management strategies: introducing tussocky grass regimes; and dividing the Downs into two landscape zones of higher and lower conservation value. Both zones are open to the public to enjoy.

3. **Public Engagement**: launch regular engagement campaigns to raise awareness among local communities about the ecological value of Clifton Down and the importance of responsible usage.

4. **Infrastructure Improvements**: relocate high-impact amenities like picnic benches to less wildlife sensitive areas or consider removing them entirely.

5. **Long-term Monitoring**: establish ongoing ecological monitoring programs to track pollinator diversity, plant health, and human impact, using this data to adapt management strategies dynamically.

6. **Action Regarding Increased Usage**: consider the potential ecological impacts associated with increased recreational use, including van-dwelling, on the long-term health of Clifton Down and the Avon Gorge, and develop appropriate mitigation strategies.

7. **Climate Resilience Measures**: prepare for climate change impacts by ensuring a diversity of pollinator species and maintaining a variety of flowering plants that bloom across seasons, supporting pollinators throughout the year.

8. **Green Flag Award and Heritage Lottery Funding**: pursue the application for a Green Flag award and bid for Heritage Lottery funding on the Downs. A strong positive message helps to enthuse site users to value Clifton Down more highly.

7. Conclusion

The findings of this study underscore the indispensable role of Clifton Down in maintaining the ecological network that supports the rare and protected species of the Avon Gorge. Human activities, if left unmanaged, threaten to disrupt this delicate balance, with potentially far-reaching consequences not only for local biodiversity but also for the conservation status of the entire area. By adopting the recommended management

practices, stakeholders can ensure that Clifton Down continues to function as a critical ecological corridor and stand alone green space, supporting both biodiversity and public enjoyment in a sustainable manner.

Effective conservation at the local level contributes to national and global biodiversity goals, and this study highlights the urgent need for integrated, well-enforced, and community-supported actions to preserve the natural heritage of Bristol.

Acknowledgements

With many thanks to Dr Caspian Johnson (UWE/BZS), Libby Houston, Professor Jane Memmott (UoB), Flora Tiley (UWE), Leonore Williams (NE) for their huge help and guidance on this study.

Declaration of interest

The author of this study is the Biodiversity engagement manager for AGDW; sits on the Downs Advisory Panel; is a member of the AGDW Steering Group; and reports to the Downs Committee on matters of ecology and people on the Downs.

Ethical standards

UWE Animal Welfare and Ethics Sub Committee approval was sought and obtained prior to surveys commencing and conditions for approval met. Bristol Zoological Society Governance approval was sought and permission gained.

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Photo credits: *Apis mellifera* and *Andrena haemorrhoa* – Denice Stout

On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE06
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendants

EXHIBIT CE06

From: [redacted]
To: [redacted]
Subject: FW: Urgent environmental concerns regarding traveller encampment on The Downs, Bristol
Date: 23 May 2025 12:26:40

From: [redacted]
Sent: 22 May 2025 11:42
To: SM-NE-Enquiries (NE) [redacted]
Cc: [redacted]
Subject: Urgent environmental concerns regarding traveller encampment on The Downs, Bristol

> You don't often get email from [redacted] Learn why this is important

Dear Natural England Enquiries Team,

I am a long-standing resident of Bristol ([redacted] and a member of the community group *Protect The Downs*. I am writing to seek Natural England's urgent advice and, if within your remit, direct intervention concerning the severe and ongoing environmental damage being caused by an unauthorised traveller encampment on The Downs.

Current situation

For some time there has been a growing number of large caravans and associated vehicles that have been stationed on the grass area itself and around it. Observed impacts include:

- Open fires directly on the turf, leaving scorched bare patches
- Routine discharge of chemical toilet waste onto grass verges
- Accumulation of household refuse, tyres and mattresses
- Cutting back of scrub and small trees for firewood
- Noise, intimidation of walkers and cyclists and obstruction of emergency-access tracks
- drug use can be smelt in certain areas

Local residents have logged multiple reports with Bristol City Council, yet enforcement has been minimal: fixed-penalty notices are issued to ordinary motorists who overstay the 5-hour limit, while the caravans remain for months. A petition signed by thousands of people has resulted in no substantive action from BCC.

Request for Natural England's guidance and assistance

1. **Designation and statutory protection:** Please confirm whether any part of The Downs itself falls within the Avon Gorge SSSI/SAC boundary, or whether Natural England considers the current activities likely to damage the features of that designation.
2. **Potential breaches:** In your view, do the fires, sewage discharge and scrub removal constitute offences under the Wildlife and Countryside Act 1981, Environmental Protection Act 1990 or related regulations?
3. **Enforcement powers and next steps:** What powers does Natural England (or DEFRA, if relevant) hold to require the landowner or local authority to prevent

further damage? If powers lie elsewhere, could you clarify which agencies we should press for action?

4. **Community evidence:** We have dated photographs, incident logs and witness statements available. Please advise on the best format and address for submitting these securely.

I appreciate that Natural England's resources are stretched, but the situation is deteriorating rapidly and the ecological and public-amenity value of The Downs is at immediate risk. Any guidance, site inspection, or liaison you can undertake with Bristol City Council and Avon & Somerset Police would be warmly welcomed by the local community.

Thank you for your time and for the essential work you do safeguarding England's natural heritage. I look forward to your advice.

Kind regards,

[redacted]

[redacted] is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE07
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendants

EXHIBIT CE07

Full Council

8 July 2025

Report of: Tim O'Gara, Director Legal and Democratic Services

Title: Petition Debate: Protect the Downs

Recommendation

That Full Council debates the petition and refers it to the Leader / relevant Policy Committee Chair for a formal response.

Summary

Under the Council's petitions scheme, where a petition has 3,500 or more signatures from people who live, work or study in Bristol, the petition organiser can request a Full Council debate.

The Council has received a petition titled "Protect the Downs"

The petition organisers have requested that Full Council debates the petition.

Details of the petition

1. The wording of the petition is as follows:

Petition title / subject: **Protect the Downs**

Protect the Bristol Downs: Enforce Council Policies and End Van Dwelling Encampments

The Downs are a vital and much-loved green space, essential to the health, recreation, and well-being of communities across our city. We call on Bristol City Council to urgently enforce their own policies and remove van dwelling encampments from the Downs before more irreversible damage is done.

The Impact on Public Health, Safety, and the Environment:

Van dwelling encampments are causing serious public health risks, with huge amounts of human waste being disposed of in bushes, endangering both people and pets.

Bristol City Council's failure to enforce rules is leading to rising incidents of threatening behaviour, open drug taking, and exposure in public areas.

Council workers attempting to clean up hazardous waste, including burnt-out caravans, have faced abuse and intimidation.

Unprecedented levels of littering, fly-tipping, and vehicle dumping are destroying the Downs' precious environment.

Cyclists and pedestrians are at significant risk due to high-sided, closely parked vehicles obscuring views of the road.

Generator and vehicle engines are often left running overnight, damaging air quality and ruining the peace and tranquillity of the Downs.

Emergency response vehicles are being prevented from easily accessing side-roads.

Humanitarian Concerns:

We are deeply concerned for the welfare of the van dwellers themselves. Without enforcement of basic safety laws, there is a growing risk of fire spreading between closely packed vehicles, and serious illness due to a lack of sanitation.

Eye-witness reports raise alarming concerns of potential human trafficking, modern-day slavery, and illegal slum letting.

Allowing van dwelling encampments blurs the distinction between those in genuine need and those choosing this lifestyle, diverting vital support away from the truly homeless. Many van dwellers are letting out their own properties and choosing to live on the Downs for free.

Financial and Legal Risks

Our elected officials may be at risk of prosecution for corporate manslaughter if anyone one of the risks were to result in a tragedy.

Our taxes would be used to cover any legal costs of a claim against Bristol City Council for injuries caused to van dwellers or the public.

Protecting the Future of Bristol's Green Spaces

Bristol City Council is responsible under the Downs Act of 1861 for the stewardship of the Durdham Downs. Their current permissiveness is not only worsening conditions on the Downs but attracting more van dwellers from across the UK to the city, not just the Downs.

Van dwellers may not fully understand the scale of the damage they are causing the environment and the community, but it is Bristol City Council's duty to act to protect our public spaces for everyone.

We Urgently Demand Action:

Enforce existing policies on van dwelling encampments.

Protect public safety and environmental health.

Preserve the Downs for all legitimate users across our city.

The Downs are a lifeline for thousands of Bristol residents — they must not be lost through neglect.

Please sign this petition to demand that Bristol City Council act now to enforce the law, protect our green spaces, and preserve the health and safety of our city — before these problems spread even further.

2. The petition has been organised by Tony Nelson.

3. The petition has secured 6481 signatures to date, 4169 from Bristol residents. Verified as of 20 May 2025.

4. Full Council is asked to debate the petition.

5. Under the petition scheme, the petition organiser is permitted up to 5 minutes to present and speak to the petition. The petition scheme allows a further period of up to 15 minutes for discussion of the petition by councillors at the Full Council meeting.

6. The Full Council has agreed the following in relation to dealing with petitions with over 3500 signatures: The topic of the debate should be referred to the Leader / relevant Policy Committee Chair, or other relevant body with the petitioner's views and Full Council's views.

RECOMMENDATION

That Full Council debates the petition and refers it to the Leader / relevant Policy Committee Chair for a formal response.

Public Document Pack

Summons to attend meeting of

Full Council

Date: Tuesday, 8 July 2025

Time: 6.00 pm

Venue: The Council Chamber - City Hall, College Green, Bristol, BS1 5TR

To: All Members of Council

Issued by: Oliver Harrison, Democratic Services
City Hall, PO Box 3399, Bristol, BS1 9NE
Tel: 0117 3526162
E-mail: democratic.services@bristol.gov.uk
Date: Friday, 27 June 2025



www.bristol.gov.uk

QUESTION PQ 11

Question submitted by: Jo Marsden

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Full council July 8th The Downs

Am writing to ask: Are you aware of the dangers posed by the gas canisters currently attached to vans and left by the roadside on The Downs? These pose a serious risk of explosion or fire, especially in this hot and dry weather. Are you aware that having gas canisters attached to vehicles like this is illegal on the highway? What action is being taken to prevent a major accident or devastating fire on The Downs as a result of this?

Response: Avon Fire have previously visited the location and liaised with occupants of lived-in vehicles and did not identify any immediate fire risk concerns associated with gas canisters.

If you are concerned about vehicle dwelling and the dangers posed by gas canisters, Avon Fire and Rescue can conduct Fire Safety Visits can be made as well as various Fire Safety Regs/ Inspections. If anyone has a particular concern either as an individual or for a property/business, they can request via https://www.avonfire.gov.uk/business-safety and/or: Home Fire Safety Visits - Avon Fire & Rescue Service Avon

2. The Downs Safety

What is being done to address the issue of human excrement being left in bushes and open areas, on the Downs which is creating a significant health hazard?

Response: If human waste is found, then it is removed by parks officers.

QUESTION PQ 12

Question submitted by: Carla Wilde

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Downs for everyone

We all know the Downs should be for the people of Bristol to enjoy and this is becoming restricted or removed due to the travellers, growing roadside community and one-off social take-overs - why have Bristol council taken no action for years and very little effect action now?

Response: BCC has taken a great deal of action within the limited legal powers available to us. The Gypsy Roma Traveller Team have worked with large numbers of Traveller encampments on the land for many years and the Neighborhood Enforcement Team have been doing an increasing amount of direct work with vehicles at the kerbside that reflect the increase in numbers over the past few years. We are doing all that we can within the confines of the legal process available to us.

2. Victorian age social issues

We all benefit from living in the 21st century with running water and sanitation, but not those living on the Downs roadside - how can a modern council justify allowing people to live in squalor, which creates social issues on our beautiful Downs and in local businesses?

Response: The current situation isn't sustainable, and our current plans include a range of proposals to support vehicle dwellers to access sanitation facilities. These include opening more meanwhile sites; and creating service sites, where vehicle dwellers can visit.

Different departments within BCC have been working collaboratively in addition to working with our partners, for an extended period to deal with the issue of van dwelling in the city.

Whilst we acknowledge more work needs to be done, we can confirm that we have and will continue to remain active in our efforts to address this important matter. As such, Bristol will continue to look for innovative ways to address this complex and challenging issue

3. Crime and council tax

We all know that people are living on the Downs for a variety of reasons, some are living cheap and saving money to buy a property, however others are flying under the radar with prostitution, drugs and people trafficking potential - when will the council survey how many vans and people are there in the first instance?

Response: BCC carries out regular full vehicle dweller counts across the whole city; the next one is due to take place in August 2025.

QUESTION PQ 14

Question submitted by: Dominic Jephcott

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Travellers on the Downs

When is the Council going to enforce the removal of the Travellers now camped on the Downs by Seawalls?

Response: The Council has now enforced the removal of this group on 01/07/2025.

2. Police enforcement of laws around travellers' misconduct.

How are the council planning to enforce the ability of the police to act against anti-social and intimidatory behaviour by the travellers to local residents as well as enforcing the eviction?

Response: The council does not have the ability to "enforce the ability of the police to act" in any situation. The police and the local authority are – and must always be – separate, independent organisations. We can and do work very closely with the police and are proud of our excellent partnership across bodies, but at the end of the day, we are autonomous parties working within our own remits.

3. Van Dwellers

When will the laws and by-laws of the land be enforced by the council and the van dwellers given alternative sites with sewage and water to stay at out of town without hiding behind the cover of focusing on mental health if the van dwellers, ignoring mental health or rights of local residents who they actually represent and the laws of the land?

Response: Bristol is proud of their innovative use of meanwhile sites to provide secure pitches for vehicle dwellers; we were the first Local Authority in the country to have taken this step, which is now being copied by many other areas. However, finding new locations for meanwhile sites is difficult. Bristol is a large city in terms of population but relatively small geographically and we do not have limitless amounts of land that can be used. When a suitable area of residential land is identified, there are many checks that must be carried out to ensure that this land is safe and suitable for meanwhile use as well as looking at the costs of adapting it for this type of use. When all checks are carried out, we must then apply for full planning consent as we would with any other type of development. From start to finish, identifying new meanwhile sites can take many months, but Bristol does have a rolling programme

of sites in mind and hope to have new pitches coming available in the next few weeks.

QUESTION PQ 16

Question submitted by: Nicholas Balderson

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Full Council Meeting - 8th July 2025

I would like to know why vans and cars parked on and around the Downs have not received parking tickets or been prosecuted for breaking the law? Most of the vehicles have number plates which can be traced back to the owners.

Response: All vehicles should park legally and in accordance with the parking restrictions in place at all times. If they do not, they are at risk of enforcement action. Parking Services enforce parking restrictions around the Downs on a regular basis. However, there are limitations on what they can do as they can only issue Penalty Charge Notices to motorised vehicles which are registered at the DVLA. This means they cannot take action against a caravan. They can, and do, issue Penalty Charge Notices to cars, vans and campervans. There are no restrictions to explicitly prevent overnight camping. The current restrictions are from Monday – Friday between 9am-5pm, no return within 2 hours. After 5pm, all vehicles can park until the waiting restrictions begin again at 9am the next day. In the last month, Civil Enforcement Officers have made 27 street visits, logged 417 individual vehicles and issued 82 Penalty Charge Notices.

2. Full Council Meeting - 8th July 2025

Why is the Downs not policed and enforced properly, especially when there are dangerous fires lit, people taking drugs and cars/motorbikes/quad bikes and commercial vans being driven dangerously all over the area?

Response:
Criminal behaviour and activity is dealt with by the police and we would always recommend reporting crime so they can build up a profile and allocate resources accordingly, and in line with priorities. The Council does apply enforcement resources to the Downs and the situation is being monitored. However, it isn't always possible to have these resources at the Downs at the moment when unwanted behaviours occur.

QUESTION PQ 17

Question submitted by: Wayne Wiseman

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Disposal of Human Waste by Van Dwellers on the Downs

In February 2025 I submitted a question to the Housing Policy Committee to which I received only a ridiculous response. The question and response were as follows: Question 10 Hygiene and Public Health How does the Council ensure that all human waste (urine and faeces) generated by Van Dwellers on the Downs is disposed of hygienically and in a manner that presents no threat to Public Health or offence to decency? Officer response: The council expect that vehicle dwellers dispose of their waste hygienically. If you have evidence that this is not the case, then please report this evidence to the council so the appropriate action can be taken. So it is clear that the Council had at that time taken no steps to ensure hygienic disposal of human waste; they just "expect" it in circumstances where such an expectation is nothing less than negligence. No campsite would be allowed to operate without suitable facilitates. Why does the council allow a large unofficial campsite to exist on the Downs without complying with statutory duties to ensure public health and decency?

Response: The Downs is not a campsite or a meanwhile site, and the advice given still stands which is that the council expects that vehicle dwellers dispose of their waste hygienically. If you have evidence that this is not the case, then please report this evidence to the council so appropriate action can be taken.

2. Reasons for Van Dwelling

The Council appears to have made the sweeping assumption that Van Dwellers on the Downs is consequence of homelessness. This may be so a a few cases, but is is clear that there are other reasons too, such as simple personal choice to save money on rent and the wish to avoid paying council tax in regular accommodation. Has the council undertaken a rigorous survey of the people are living in vans on the Downs to ascertain their reasons for doing so, and if not why not?

Response: The Council have not undertaken any formal survey around individuals' reasons for living in a vehicle for the same reasons that we do not routinely ask household residents why they choose to live on a particular road or in a specific part of the city. We have surveyed vehicle dwellers across the city in the past and gained a great deal of information about them, but responding to such research is voluntary. We are likely to conduct similar surveys in the future and reasons for vehicle living may well form part of this data gathering, although it will be citywide and participation will again be voluntary.

QUESTION PQ 18

Question submitted by: James Henderson

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Why are the council not enforcing the five hour parking limit on the Downs (and Saville Road and Parry's Lane)?

There are caravans and campervans occupying nearly every parking space . People are living, and possibly dying in these- One appears to be a brothel, and we have seen drugs being taken. The hedges and storm drains are being used to empty chelical toilets. Lots of rubbish and large items are dumped. It is difficult to cross the road as visibility is impaired and I have had several near misses. My 13 year old daughter has been sexually harrased by at least one man living in a caravan (several occasions, not sure if same man or more than one). If I parked a car there, I would expect a ticket, and then to be towed. Why is the law not being applied? I am paying thousands in council tax, and these dwellers are not. Theur rubbish end up in my bin, and my mild deliveries are stolen. Conditions are unsanitary and unsafe.

Response:

All vehicles should park legally and in accordance with the parking restrictions in place at all times. If they do not, they are at risk of enforcement action. If you are witness to or a victim of a crime or antisocial behaviour then this should be reported to the police.

Parking Services enforce parking restrictions around the Downs on a regular basis. However, there are limitations on what they can do as they can only issue Penalty Charge Notices to motorised vehicles which are registered at the DVLA. This means they cannot take action against a caravan. They can, and do, issue Penalty Charge Notices to cars, vans and campervans. There are no restrictions to explicitly prevent overnight camping. The current restrictions are from Monday – Friday between 9am-5pm, no return within 2 hours. After 5pm, all vehicles can park until the waiting restrictions begin again at 9am the next day. In the last month, Civil Enforcement Officers have made 27 street visits, logged 417 individual vehicles and issued 82 Penalty Charge Notices.

QUESTION PQ 19

Question submitted by: Nerys Rowsell

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. When will the Council and Police use the full powers at their disposal to move on travellers (GRT) from the Downs?

When will the Council and Police use the full powers at their disposal to move on travellers (GRT) from the Downs?

Response: BCC has used the powers at their disposal to remove recent groups. The police have different powers available to them that can be used in cases of significant antisocial bevahiour and/or criminality. Although I cannot comment on police action, it has not been felt that the criteria for use of their powers have been reached.

2. GRT antisocial behaviour and law breaking on the Downs

Why do the Police and Council allow travellers (GRT) to law break, intimidate, blight the Downs with rubbish and generally act with impunity?

Response: The Police and the council do not allow these things to happen. When laws and rules are broken and reported, they are acted upon and where proof is available, behaviour will be challenged. In the case of the recent encampments of Travellers on the Downs, all powers available to us through civil law were utilised in the successful eviction from the land.

3. Van dwellers on the Downs

Why has the Council allowed the numbers of van dwellers on the Downs to multiply to these out of control numbers and what do they intend to do about it?

Response:

The council manages vehicle dwelling encampments in line with its policy and where a vehicle or vehicle dwelling encampments are designated as being high impact, we will take appropriate action.

We know that we need to reduce the need for so many people to live in vehicles, and remain committed to increasing the number of well-built, affordable homes in Bristol so that people have a safe and secure place they can call home. I have stated on

numerous occasions that the current situation on the Downs and in other parts of the city is not sustainable.

A new policy is being developed which will balance offering support to vehicle dwellers, alongside considering the needs of the local community. It will also look to refresh the way vehicle dweller encampments are managed, providing a clearer process and explanation for when action will be taken. As part of this process, we will be running a consultation, and we want to hear from everyone affected by these issues – including vehicle dwellers and members of the local communities around encampments.

QUESTION PQ 24

Question submitted by: Jemma Thomas

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. What aren't you using the law there to protect us?

Council Question – Use of Section 61 Powers (CJPOA 1994): Under Section 61 of the Criminal Justice and Public Order Act 1994, the police have the power to immediately direct trespassers to leave land where there has been damage to the land, threatening or abusive behaviour, or where six or more vehicles are present. Based on what local residents have experienced and reported—including public health risks from human waste, environmental damage, antisocial and threatening behaviour, and an elderly resident being physically attacked—it appears that the legal criteria for using Section 61 have clearly been met. Why have the Council and police chosen not to invoke or request action under Section 61, despite this legal framework being available? And crucially, on what basis is the current inaction considered to be protecting residents—many of whom are now too frightened to use public spaces and are suffering real harm to their wellbeing, safety, and mental health as a result?

Response: As you have identified, section 61 powers are police powers and not something that is available to the council. Section 61 can only be used in cases of significant antisocial behaviour and/or criminality. Although we liaise closely with the police, we cannot comment on their decision-making process, but it has not been felt that the criteria for use of this power have been reached.

QUESTION PQ 32

Question submitted by: Helen Boyd

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Timing of removal of van dwellers

Why will it take a year to identify suitable sites for the van dwellers to move to as has been stated by Barry Parsons

Response: Bristol is proud of their innovative use of meanwhile sites to provide secure pitches for vehicle dwellers; we were the first Local Authority in the country to have taken this step, which is now being copied by many other areas. However, finding new locations for meanwhile sites is difficult. Bristol is a large city in terms of population but is relatively small geographically and we do not have limitless amounts of land that can be used. When a suitable area of residential land is identified, there are many checks that must be carried out to ensure that this land is safe and suitable for meanwhile use as well as looking at the costs of adapting it for this type of use. When all checks are carried out, we must then apply for full planning consent as we would with any other type of development. From start to finish, identifying new meanwhile sites can take many months, but Bristol does have a rolling programme of sites in mind and hope to have new pitches coming available in the next few weeks.

2. Who will any identified sites be for.

Will sites identified for use of van dwellers on the Downs and elsewhere in Bristol, be for the use solely of Bristol based van dwellers or van dwellers who come to Bristol from elsewhere in the country as well.

Response: Meanwhile sites pitches are awarded on a points-based system dependent on need. One of the main criteria within this process is that applicants must have a proven Bristol connection before they are able to apply.

3. Hygiene Facilities

Some of the Downs van dwellers have suggested that as local residents are concerned about the hygiene aspect i.e. human waste in the bushes "why don't they put some hygiene facilities in place" I assume by 'They' the council is meant. I would like assurance that the council have no plans to do this. Putting facilities on the Downs for the benefit of van dwellers will further legitimise their illegal occupation on the Downs and encourage yet more van dwellers to come to Bristol.

Response: I can confirm that it is our current policy that we do not provide chemical toilets or other hygiene facilities for encampments anywhere in the city.

QUESTION PQ 33

Question submitted by: Emma Muggridge

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Health and Safety Assessment of the Downs

Do you think you should undertake a heath and safety assessment of the Downs for its use by visitors and future public events. Is it now a safe environment? Should this take into account persons living on the downs and the roads, human shit in bushes, rubbish, dirty toilet paper, speeding cars , limited parking for cars and coaches, gas cannisters fronting public roads, no spacing of vehicles using gas cannisters for heating,,cars/ motorbikes/ electric bikes driving at speed over the downs sometimes wearing baloclavas.

Response: BCC, alongside our network of partner organisations, carries out constant dynamic assessments over all areas of the city in respect of health and safety. Where risk factors are identified, they are dealt with by the appropriate department on an individual, localised basis and not as part of a whole block of land.

QUESTION PQ 44

Question submitted by: Bernard Sheek

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. The Downs

Question one: I would be grateful if you would set out what the Council are proposing to do about the destruction of the environment on the Downs caused by the very long term parking, abandonment and occupation of vans, lorries and caravans on the roads serving the Downs. The parking and abandonment and occupation is not just a total eyesore it is environmentally unacceptable and has dangerous health implications. Residents are refused permission to do anything that adveresely impacts the environment in this sensitive conservation area, but the owners and occupiers of the visually detrimental vehicles are free to do what they want with no intervention by the council to protect this conservation area. It is unlawful and contrary to waiting restrictions but nothing is done about it. Would you please confirm that I can ignore traffic regulation orders with no consequences. If not, please explain the justification for the unequal treatment. The use of the Downs for toilet procedures is also unlawful and has severe health implications. Would you please confirm that the council will compensate anyone falling ill as a result. Can you please explain why the Council have done nothing and whether, in the circumstances, it will reduce the council tax band of those properties adversely affected by the extremely detrimental changes to the area.

Response: All vehicles should park legally and in accordance with the parking restrictions in place at all times. If they do not, they are at risk of enforcement action.

Parking Services enforce the parking restrictions around the Downs on a regular basis. However, there are limitations on what they can do as they can only issue Penalty Charge Notices to motorised vehicles which are registered at the DVLA. This means they cannot take action against a caravan. They can, and do, issue Penalty Charge Notices to cars, vans and campervans. In the last month, Civil Enforcement Officers have made 27 street visits, logged 417 individual vehicles and issued 82 Penalty Charge Notices.

2. The Downs

The use of the Downs for toilet procedures is also unlawful and has severe health implications. Would you please confirm that the council will compensate anyone falling ill as a result.

Response: Seeking prosecution for acts of public defecation is very difficult to achieve as the burden of proof required for such an action is very hard to satisfy. Unless someone is, quite literally, evidenced to have been caught in the act, there is little that can be done legally.

3. The Downs

Can you please explain why the Council have done nothing and whether, in the circumstances, it will reduce the council tax band of those properties adversely affected by the extremely detrimental changes to the area.

Response: The council manages vehicle dwelling encampments in line with its policy and where a vehicle or vehicle dwelling encampments are designated as being high impact, we will take appropriate action.

We know that we need to reduce the need for so many people to live in vehicles, and remain committed to increasing the number of well-built, affordable homes in Bristol so that people have a safe and secure place they can call home.

A new policy is being developed which will balance offering support to vehicle dwellers, alongside considering the needs of the local community. It will also look to refresh the way vehicle dweller encampments are managed, providing a clearer process and explanation for when action will be taken. As part of this process, we will be running a consultation, and we want to hear from everyone affected by these issues – including vehicle dwellers and members of the local communities around encampments.

We can confirm that council tax will not be reduced.

QUESTION PQ 45

QUESTION PQ 50

Question submitted by: Sharon Scott

To Cllr. Williams, Public Health & Communities Chair

Subject: Van Dwellers

Question 1. The Public Health and Communities Policy Committee recently approved new Public Space Protection Orders to control pedlars on the Harbourside area on the grounds of public safety. As the policy chair will be aware, the very large van dweller encampments on the Downs are perceived by many residents, including by residents of his own ward, as a major threat to public safety with numerous reports of cars and motorbikes zooming across the Downs at speed, anti social and criminal behaviour (which has been reported to the police) as well as a physical obstruction with increased road accident risk. There is also the environmental issues around litter, fly tipping, emptying waste onto the Downs and reports of human faeces in the bushes. Will the policy chair support local residents in their wish to have a Public Space Protection Order to control van dwelling on the Downs?

Response: Bristol has taken learning from other local authorities, that we regularly meet with, that have attempted to introduce PSPOs but found them to be unfit for their intended purpose of unauthorised encampments of vehicle dwellers. The only available sanction for the breach of a PSPO is to issue a Fixed Penalty Notice, but this is only effective when the recipient has a home address so that potential nonpayment can be followed up. As this is usually not the case for people living in a vehicle, the use of a PSPO has been proven by other areas to be unworkable.

Question 2. Access to green space is essential for mental well being. Many residents around the Downs live in flats and for them the Downs represent their only easily accessible green space. The large van dweller encampments and, in particular the caravans with their drug dealing, anti social behaviour and violence, have resulted in many residents, especially women, fearful of walking on the Downs. This has obviously had an impact on their well being and mental health. Could the policy chair advise what steps he has made to undertake assessments of the impact of van dwelling on the well being and mental health of residents, especially women.

Response: Liaising closely with the police as we constantly do, they are not aware of any significant drug dealing, antisocial behaviour or violence amongst the vehicle dwelling population of the Downs. There has been an increase in reported crime, but reported crime and actual crime are very different things. The GRT Team meet with both senior and local police commanders on a weekly basis to discuss all parts of the city including the Downs and in so doing carry our ongoing dynamic assessments of risk.

Question 3. The ecology of green spaces in an urban context is understandably very fragile and the Downs are no exception. As the policy chair you will be well aware of the environmental damage, which van dwelling and other unlawful encampments cause to the Downs. Having been in office for over 12 months as policy chair, what actions has been taken to mitigate the environmental damage being done to our cherished green spaces in Bristol?

Response: The Parks Service has recently introduced new grass management regimes to parts of the Downs specifically designed to enhance biodiversity and protect areas of calcareous grassland and will soon be relocating picnic benches away from more ecologically sensitive areas. More widely, how we manage and locate events on the Downs and the introduction of wooden posts to part of the grass boundary to signify that vehicles should not be driven on to grass areas, are both designed to support conservation management.

QUESTION PQ 51

Question submitted by: Helen Webster

To Cllr. Dyer, Leader of Council

QUESTION PQ 54

Question submitted by: Jemma Thomas

To Cllr. Parsons, Homes and Housing Committee Chair

Subject: Van Dwellers

1. Protection of the Downs

Why has the Council chosen not to enforce section 61 to these groups as they have clearly hit the criteria of significant damage, threatening and abusive behaviour, and 6 or more vehicles.

Response: Section 61 powers are police powers and not something that is available to the council. Section 61 can only be used in cases of significant antisocial behaviour and/or criminality. Although we liaise closely with the police, we cannot comment on their decision-making process, but it has not been felt that the criteria for use of these power have been reached.

2. Council inaction to prevent

Why has the Council not progressed activity to stop these activities in the first place such as 1. posts around the area, leaving one entrance available for ambulance access, this could be created at an angle that would allow an ambulance access but not a longer vehicle such as a caravan, and display clear signage that any access to the downs is unauthorised and will result in immediate removal 2. Speed bumps on the roads around the Downs, to stop the speeding of cars 3. Appropriate signage to tell people driving and parking on the Downs is not allowed, and nor are fires and bar b ques. Please respond to each suggestion.

Response:
There are no plans to put barriers across the Downs at the moment, we are mindful that this would change the character of the Downs considerably, but options remain under review by the Council's Parks Service and the Downs Committee. There are proposals to improve signage about what is permitted on the Downs – however given the scale of the Downs there is a need for some care with design and a balance to be struck as to how many of these are provided and where they are located. The regulations available for us to manage and enforce against trespass won't always allow for immediate removal of vehicles and so this is not a message we can give.

We are aware that there have been concerns over the years regarding the volume and speed of traffic using the Downs as well as some related anti-social behaviour particularly at night time. However, there are currently no plans for any traffic

calming measures across the Downs as there are relatively few collisions here compared to other roads across the city.

3. Van dweller residents

Why does the Council not ensure the Police enforce their responsibilities under the Police, Crime, Sentencing and Courts Act 2022 which makes it a criminal offence to reside on land without consent if its causing distress and if they refuse to leave when asked. If this is due to travellers being protected under the Equality Act then does the Council understand the legalities enough to know that they are protected from discrimination based on race, but it doesn't make them above the law when breaking them, so the relevant laws can be applied when they are acting illegally.

Response: Although we meet regularly with the police and have a very positive partnership relationship with them, it is not our place to demand or require them to use any specific pieces of legislation. We can, and frequently do, make requests, and both ask for and offer advice, but the police have their own requirements and guidelines under which they operate, and we have no influence over these.

On behalf of: Claimant
Witness: Caroline Ennion
Witness Statement: 2
Exhibits: CE08
Date: 16th July 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

PERSONS UNKNOWN

Defendants

EXHIBIT CE08


























































Ambassador XL



































WITNESS STATEMENT

Criminal Procedure Rules, r 16. 2; Criminal Justice Act 1967, s. 9

URN

Statement of: PS4481 Alan GENTRY

Age if 18 or under: Over 18 *see overleaf *(if over 18 insert 'over 18')* Occupation: Police Officer

This statement (consisting of 2 page(s) each signed by me is true to the best of my knowledge and belief and make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.

Victim / Witness signature: Alan GENTRY 4481 Date: 15/07/2025

I am Police Sergeant 4481 Alan GENTRY of the Avon and Somerset Constabulary.

I am a uniformed Police Officer based at Southmead Police Station in Bristol.

I am the local Neighbourhood Policing Sgt for Bristol North.

I manage a Team of uniformed Police constables and Police Community support Officers across a defined Geographical area.

As part of my day to day duties I oversee Police related matters from a Neighbourhood Policing perspective as may arise on the Bristol Downs area.

I have been asked to provide information relating to reports of anti-social Behaviour, Criminality or Public safety as may arise in the vicinity of Unauthorised encampments when they occur on the grassed areas of Bristol downs, Durdham downs and Tarmac section of Ladies Mile.

This is a complicated request and time consuming due to the various locations and reporting systems.

I am unable to provide a detailed analysis within the timeframe required.

Signature Alan GENTRY 4481 Signature Witnessed By

Witness Name: PS4481 Alan GENTRY URN

I can confirm that we have received numerous reports in recent months relating to anti social Behaviour on and around the downs at the times when Unauthorised Encampments have been present.

Members of the public have called Police reporting multiple incidents including

- The riding of Quad bikes across grassed areas,
- Persons driving motor cars and vans in and around unauthorised encampment locations
- Dogs running loose
- ASB such as noise and Stone throwing
- Damage to the toilet block on Sea Walls

The above are all reports where members of the public have attributed behaviour to persons they believe to be in the vicinity of an unauthorised encampment.

On the 17th of June 2025 an unauthorised encampment set up on the Ladies mile area.
On the 25th June this camp was moved on and relocated to Sea walls area nearby
A few days later a further encampment was set up by a different group on the Ladies mile location.

Both of these groups were moved on by Bristol City council on the 1st July.
Police were in attendance on the 1st July in support of all parties present.

As a general point I can confirm that following many of the unauthorised encampments moving away from the area there have been a significant volume of waste left at the locations, often Household and garden waste such as Tree branches.

Signature Alan GENTRY 4481 Signature Witnessed By

On behalf of: Claimant
Witness: Caroline Ennion
Statement: 3rd
Exhibits: CE1-CE6
Date: 23rd October 2025

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N :-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

THIRD WITNESS STATEMENT OF CAROLINE ENNION

I, CAROLINE ENNION of Sea Mills depot, 41 Sea Mills Lane, Bristol City Council will say as follows:

1. I am employed by the Claimant as the Area Park Manager, and I am authorised to make this statement.

2. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information

supplied by others, the source of information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

3. I make this statement to review the Injunction granted on 25th July 2025 for Durdham Down, Clifton Down and Ladies Mile ("The Downs").

4. The Injunction Order and Map were placed at 24 locations around The Downs on 8th August 2025. See Certificate of Service **Exhibit "CE1"** and map of locations see **Exhibit "CE2"**

5. A group of 4 traveller caravans arrived at The Downs on Sunday 17th August 2025 and occupied the land immediately adjacent to the Forwards Festival site, without permission. A tent, unconnected to the travellers was at a similar location to the east of the festival site. The travellers were joined by another 2 traveller caravans on Tuesday 19th August. There were a few reports and complaints about the presence of the travellers and the tent from local people and councillors. The Forwards Festival event organisers were concerned that the event would not be able to run because the travellers had occupied the main access and egress route to the event.

6. A welfare check was carried out on the Tuesday 19th August by the Gypsy Roma Traveller Team **Exhibit "CE3",** no issues were identified. They also issued a Trespass Notice **Exhibit "CE4"**. St Mungo's, The Council's partner that offers support to Rough Sleepers, were advised about the tent but were unable to visit because of the short timescales involved.

7. The 2 hours vacancy period was discussed between the Police and The Downs team prior to serving the Injunction. It was agreed that because there was not a high degree of public nuisance at that time, the preference would be to achieve an orderly withdrawal of the travellers from the site. In this instance therefore, both parties would be happy to negotiate a longer time to vacate the site, providing this was completed before the start of the Festival. The Neighbourhood Police team and The Downs Supervisor served them with the Injunction on Wednesday 20th August 2025. It was negotiated with the travellers that they would vacate the site

by the morning of Thursday 21st August. At 0708 on 21st August 2025 the Police advised that the travellers and the tent had left the site. This negotiated departure was a good outcome as it gave the travellers time to pack up and find a new site, reduced conflict between the parties and, as a consequence required fewer resources to manage.

8. The travellers did leave a fair amount of household rubbish behind, which took a total of 10.5 hours to remove the waste and litterpick but not as much as the previous encampments which took several days and cost approximately £13,200.

9. On Monday 15th September another tent was reported on The Downs. The Downs Supervisor served a copy of the Injunction Order at the vacant tent on 17th September 2025, see Certificate of Service. **Exhibit "CE5"**. The tent left the following day. St Mungo's were advised about this tent, but it had gone before they could visit.

10. On 25th September in the afternoon another group of travellers moved onto The Downs. On 26th September the Police and The Downs Supervisor served the Injunction and explained the process. **Exhibit CE6** As they did so, some of the travellers became aggressive saying that because the court processes normally take a while, it gives them a few weeks occupation before they have to vacate. They did eventually accept the Injunction and negotiated that they would leave before 29th September. On 28th September in the evening the travellers left the land. Clearance of this encampment only took 2 hours as they were not on site for long. This was a successful intervention because this group had, previously in the year, caused thousands of pounds of clear up costs and damage to property at Henacre Open Space and Sea Mills Recreation Ground. This was because of the amount of time they occupied Henacre Open Space in particular, allowed them to accumulate large volumes of waste which they left behind.

11. Following the approval of the Injunction in July 2025, Parking Services visited Ladies Mile every weekday for 15 days. No caravans were observed. They did identify a number of vehicles that could be lived in over this time. All but two of these vehicles stayed just one night, with one vehicle staying 2 nights and the

other staying for 4 nights. Since the beginning of July, there was only one single customer report telling the Council about the longest staying van but there were no specific reports of ant-social behaviour associated with any of the vehicles on Ladies Mile. Again, we feel that this has been a successful intervention to control the spread of lived-in vehicles and caravans to the highways around The Downs. The Highways team are also supportive of keeping this road clear.

12. There are still issues with flytipping and we continue to receive reports of people defecating and/or urinating on The Downs but any perpetrators are difficult to identify in order to carry out any type of enforcement action. However, I still believe having the Injunction in place adds to the deterrent effect.

13. Having the Injunction in place has also gone some way to restoring public confidence in the Council's management of The Downs and has reduced the number of complaints about travellers on the green space.

14. I therefore conclude that the Injunction has been successful. I am requesting that the Court extends the duration of the injunction which will expire on 25th July 2026; to 30th November 2026 because:
    - This is the end of meteorological autumn so will entirely cover the dry summer and autumn which travellers and tents prefer because they are able to dwell on The Downs without getting stuck in soft ground.
    - It also prevents any conflict with the management of larger events for the whole of the event season.
    - It will allow the football season to establish by preventing encampments settling on and damaging the 26 pitches that The Downs earns income from every Wednesday and Saturday starting in September.
    - It covers the October half-term holiday where public use of The Downs increases again and this injunction helps prevents conflict between authorised and unauthorised activities.
    - It includes Halloween which results in a peak of anti-social behaviour.

15. I submit that an extension to the duration of the Injunction, as detailed above, is

just and convenient considering the various encampments that have occupied The Downs this year and in previous years.

Statement of Truth

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

Signed: **Caroline Ennion**

Dated: **23rd October 2025**

On behalf of: Claimant
Witness: C. Ennion
Statement:3rd
Exhibit: CE1

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

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

Defendant

EXHIBIT CE1

Certificate of service

Name of court	Claim No.
County Court at Bristol	M00BS959
Name of Claimant Bristol City Council	
Name of Defendant Persons Unknown	

On what day did you serve? 08/08/2025

The date of service is 08/08/2025

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Injunction Order - 25.07.2025, Power of Arrest - 25.07.2025, Map

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☑ by delivering to or leaving at a permitted place
- ☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
- ☐ by other means permitted by the court *(please specify)*
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Durdham Down, Clifton Down and Ladies Mile, Bristol

Being the

- ☐ claimant's
- ☑ defendant's
- ☐ solicitor's
- ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☑ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name BENJAMIN SKUSE

Signed B Sk

(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held DOWNS SUPERVISOR

(If signing on behalf of firm or company)

Date 08/08/2025

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On behalf of: Claimant
Witness: C. Ennion
Statement:3rd
Exhibit: CE2

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

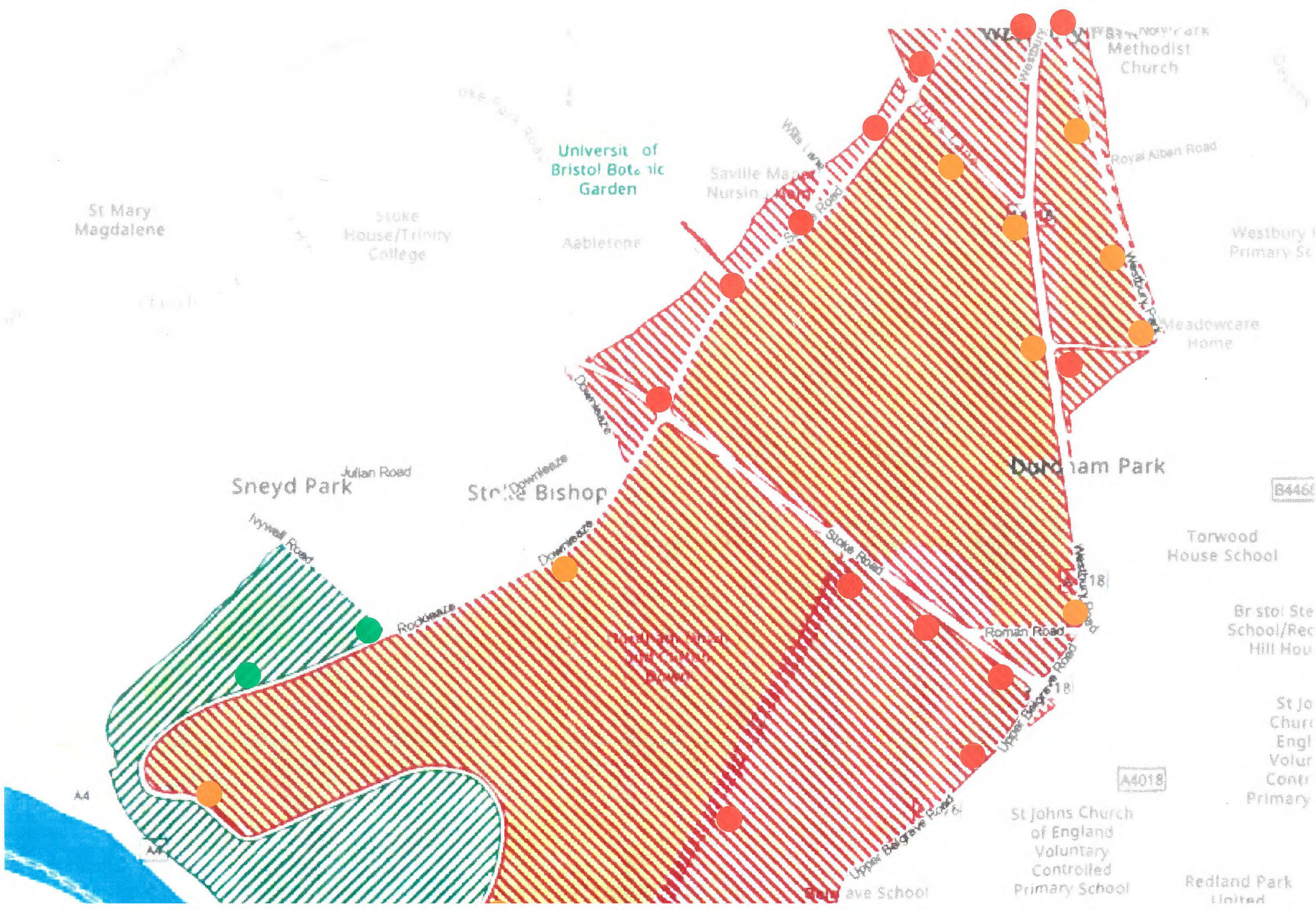
Claimant

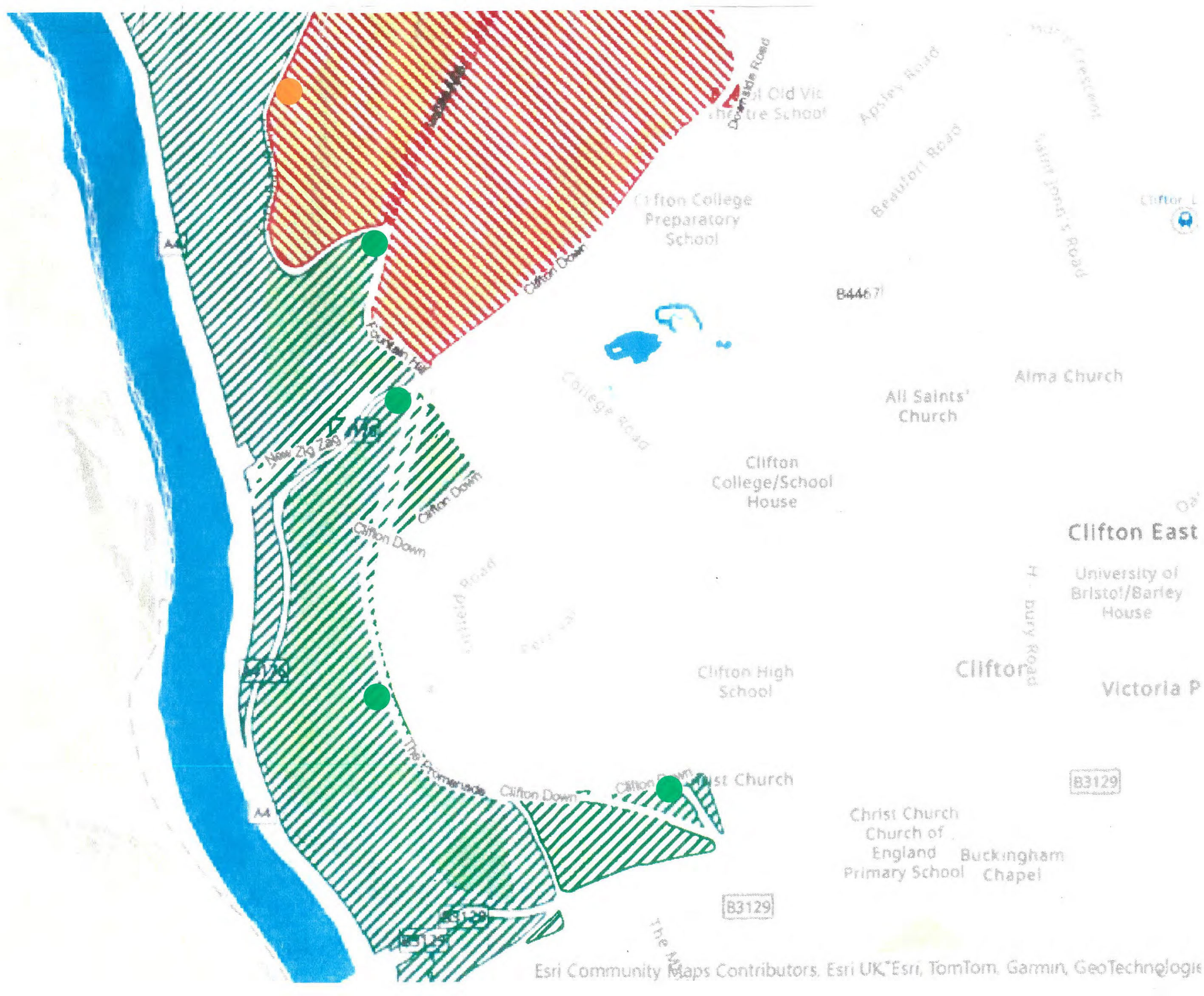
and

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

Defendant

EXHIBIT CE2


Methodist Church
Royal Albert Road
Meadowcare Home
Westbury Primary Sc
University of Bristol Botanic Garden
St Mary Magdalene
Stoke House/Trinity College
Saville Mews Nursing Home
Stoke Road
Aabletene
Durdham Park
Sneyd Park
Julian Road
Stoke Bishop
Ivywall Road
Downleaze
Rockleaze
Stoke Road
Roman Road
Upper Belgrave Road
Torwood House School
Bristol Ste School/Rec Hill Hou
St Jo Churc Engl Volur Contr Primary
A4018
B4466
A4
St Johns Church of England Voluntary Controlled Primary School
Redland Park United


Clifton College Preparatory School
Clifton Down
Clifton Down Road
Apsley Road
Beaufort Road
St Old Vic Theatre School
B4467
Alma Church
All Saints' Church
College Road
Clifton College/School House
Clifton East
University of Bristol/Barley House
Clifton High School
Victoria P
B3129
Christ Church Church of England Primary School
Buckingham Chapel
Esri Community Maps Contributors, Esri UK, Esri, TomTom, Garmin, GeoTechnologie

C174

On behalf of: Claimant
Witness: C. Ennion
Statement:3rd
Exhibit: CE3

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

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

Defendant

EXHIBIT CE3

Bristol City Council

Unauthorised encampment

Request for Welfare needs and personal circumstances information of occupants

To: Steven Hearsey

From: Caroline Ennion

I would be obliged if you would arrange for the above site to be visited by your officers, as a matter of urgency, and for them to undertake an assessment of the encampment covering the following matters. Please complete each section. Mark those sections which are not relevant with 'NA'.

General:

- **Occupants are not willing to divulge relevant information.**
- **Occupants are willing to engaging in welfare needs checks and divulge relevant information for the welfare checks to be carried out effectively.**

1. Location and description of land

Clifton Down open space, Ladies Mile, Bristol

2. Name of occupants on site:

Name	Contact Number
No details given	

3. Are there any occupants not on site at the time of visit (e.g. another family unit, whose details cannot be provided)? **NO**

- If yes has a letter (appendix 4) been left for completion by this family? **YES/NO**
- What arrangements have been made for meeting with them?

If yes please give details after each question:

4. Total number of vehicles:

Make	Registration	Colour/Description	Other details (e.g. vehicle used for towing, etc.)
Occupants did not want us to take down vehicle details			

5. Number of living vehicles and accommodation available:

6 x caravans

1. **Date of arrival and reason for w**hy have they parked on the land?

17/08/2025 passing through Bristol

2. Is there any damage to the land? **NO**
   If yes please give details after each question:

3. How long do they intend staying?

A week or two

4. Any action against the occupants by, for example, local people?

NO

5. Any **known risks** to the occupants of the encampment?

N.B. State whether there are any concerns regarding visits to the family home? Whether visits can be conducted along or with workers from other agencies? What works has been undertaken to date? Did it produced any

No Known risks

6. Family Structure: Keep each generation on the same horizontal line, please circle/highlight household members:

FAMILY TREE

Not known

Children:

Name	Date of Birth	Sex	In School (yes, no, EHE or need support)
No details given			

7. Are any children of school age known by Travellers' Education Liaison? **NO**
If yes please give details after each question:

8. Provide details of the education provision for any child of compulsory education age

9. Do any of the occupants have any health problems? **NO**
If yes please give details after each question:

14. Are the children registered with any local GPs? **NO**

If yes please give details after each question:

15. Any other relevant needs

NO

16. **Child/(ren's) Health and Development Needs:** General health, physical development, speech, language and communications development, emotional and social development, behavioural development, identity, including self-esteem, self-imagine and social presentation, family and social relationships, self-care skills and independence, understanding, reasoning and problem-solving, participating in learning, education and employment, progress and achievement in learning aspirations. Ensure you include parent/child/child's views:

Children's health and development appeared fine

17. **Parenting Capacity of Parents / Carers:** Basic care, ensuring safety and protection, emotional and warmth stability, guidance, boundaries, stimulation, heath needs (learning disability, substance misuse) and communications. Ensure you include parent/carer/child's view:

Parents appeared capable and caring

18. **Family & Environmental Factors:** Family history, functioning and well-being, wider family, housing situation (type, size, area, do all children have their own rooms, if not, who shares? Is there overcrowding?), employment and financial considerations, social ad community elements and resources including education. Ensure you include parent/carer/child's view:

N/A

Consent for Information Sharing:
In order to provide you with the best service possible we need to consult colleagues from other agencies who have additional expertise (Children Act 2004 Section 10 – Co-operation to Improve Well-being). We will treat the information that is shared at the professional consolation meetings as confidential and will not share it with any other organisations unless we are required by law (Section 17 of the Children Act 1998) to share it or unless you will come to some harm if we do not share it. In any case we will only ever share the minimum information we need to share.

Signature:

Date:

Health Needs:

16. Are any of the adult Travellers suffering from illness?

NO

17. Arrangements with local Doctors/Health Authority, if any?

Not at this time

18. Are there any pregnant women? **NO**

If yes please give details after each question:

19. If so, when are they due to give birth?

20. Does anyone require any medical services now (e.g. awaiting operation)? **NO**

If yes please give details after each question:

Accommodation

21. Subject to eligibility and availability, do any of the Occupants wish to be accommodated on the council's Transit Site for nomadic people? **NO**

If No, why not?

The transit site is closed

22. Do any of the occupants wish to be considered for accommodation under homelessness or other legislation: **NO**

If yes what action has been taken to progress their application:

Employment / Education:

23. Are any of the occupants employed locally or attending College/University in the area?
NO

If yes please give details after each question:

24. Do occupants have access to drinking water and toilet facilities? No

If no, would they be willing to pay for amenities?

If yes, how would that be funded?

25. Do any of the occupants receive or need support from any of the following agencies Welfare agencies, such as Social Services or other

Health Agencies – Dr, Health Visitor, clinic, hospital

If yes, are occupants prepared to consent to them providing any information to the council that may be relevant to the decision of how to deal with this trespass? Ensure occupants sign a consent form

Provide details and contact name/number below

Not at this time however I left our contact details in case they change their minds

General:

26. Are there any other needs identified that may be relevant ?

NO

27. Previous stops

Location of last two stops

Reason for leaving

Any address (whether a caravan site or other form of accommodation) that occupants use at other times of the year

Details of where occupants would go if required to leave this place

Not known

28. Mechanical breakdown and arrangements for repairs?

NO

Name of Officer: Steven Hearsey_____

Date: 19/08/2025_____

OFFICER CHECK LIST	
Letter left with occupant(s) not currently on site re: welfare checks	YES
Officers Business Card left with occupant(s)	YES
List of helpful telephone numbers left with occupant(s)	YES

Steve Hearsey
Gypsy and Traveller Site Manager
Private Housing & Accessible Homes
Bristol City Council, BS1 5AA
Tel: 0117 92 24272
0117 922 4272
Fax: 0117 92 22269
E-mail: gypsies.travellers@bristol.gov.uk
Opening Hours: Mon - Fri 9am to 5pM
Out of hours call Emergency Control: 0117 922 2050
Our Ref: ST/JT/Appendix 4
Your Ref:
Date:

Dear Occupant,

Unauthorised Encampment – (address)

With regard to your occupancy of the above-mentioned land I would inform you that I have visited today but you were not on the site at the time of visit. As such I would ask that you please complete the following information providing details of occupants and return it to this council in the pre-paid envelope provided.

This information will enable Bristol City Council to contact you and obtain relevant information to help decide how to deal with the encampment. Please state below the dates and times you will be available in the next [ ] days, i.e. before [date] to enable an officer from the council to visit you.

Please note that if you do not get in touch within the time indicated a decision may be made without your input.

Dates and times before [ ] when occupants will be available to meet with the council officer:

Name of Occupants and date of birth	Contact Number if Applicable

Thank you for this information. Should you wish to contact me please do not hesitate to call Steve Hearsey on 0117 92 24272.

Yours sincerely,

Steve Hearsey

Gypsy and Traveller Site Manager
Private Housing & Accessible Homes
Housing Solutions

On behalf of: Claimant
Witness: C. Ennion
Statement:3rd
Exhibit: CE4

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

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

Defendant

EXHIBIT CE4

All persons in occupation of the land at Clifton and Durdham Downs, Bristol

Reply to
Telephone 0117 922 3838 or 0117 9222050
Minicom
Fax
E-mail
Our ref
Your ref
Date 19/08/2025

To All persons in occupation of the land at Clifton and Durdham Downs, Bristol

Dear Sir/Madam

RE: Unlawful occupation of the land at Clifton and Durdham Downs, Bristol

It has come to my attention that your caravans are encamped on the above land which is owned by this Council. You do not have the Council's consent to occupy the land and accordingly **you are trespassing.**

The Council holds you liable for the costs of any damage. Your continuing occupation and any damage which would inevitably be caused by it, would cause loss to the public purse.

In the circumstances the Council asks you to vacate the land forthwith and to move on immediately and voluntarily.

Yours faithfully

Pp

Service Director Strategic Housing

Bristol City Council

On behalf of: Claimant
Witness: C. Ennion
Statement:3rd
Exhibit: CE5

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

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

Defendant

EXHIBIT CE5

Certificate of service

Name of court	Claim No.
COUNTY COURT AT BRISTOL	M00B5959
Name of Claimant	
BRISTOL CITY COUNCIL	
Name of Defendant	
PERSONS UNKNOWN	

On what day did you serve? 17/09/2025

The date of service is 17/09/2025

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

INJUNCTION ORDER 25/07/25 PLUS MAP

On whom did you serve?
(If appropriate include their position e.g. partner, director).

PERSONS UNKNOWN

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☑ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
- ☐ by other means permitted by the court *(please specify)*
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

DURDHAM DOWN, CLIFTON DOWN LADIES MILE

Being the
- ☐ claimant's
- ☑ defendant's
- ☐ solicitor's
- ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☑ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name: BEN SKYSE

Signed: [signature] (Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held: DOWN SUPERVISOR (If signing on behalf of firm or company)

Date: 17/09/2025

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Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim
A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

On behalf of: Claimant
Witness: C. Ennion
Statement:3rd
Exhibit: CE6

IN THE COUNTY COURT AT BRISTOL **CLAIM NUMBER: M00BS959**

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

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

Defendant

EXHIBIT CE6

Certificate of service

Name of court	Claim No.
Name of Claimant PERSONS UNKNOWN	
Name of Defendant BCC	

On what day did you serve? 26/09/2025

The date of service is 26/09/2025

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

INJUNCTION ORDER

On whom did you serve?
(If appropriate include their position e.g. partner, director).

PERSONS UNKNOWN

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☑ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
- ☐ by other means permitted by the court *(please specify)*
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

CLIFTON DOWN, PUKPHAM DOWN AND LADIES MILE

Being the
☐ claimant's ☐ defendant's
☐ solicitor's ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name: BEN SKUSE

Signed: B Sk

(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held: DOWNS MAINTANENCE SUPERVISOR

(If signing on behalf of firm or company)

Date: 26/09/2025

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In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

]

On behalf of: Claimant
Witness: Robert Archer

Statement: 1st
Exhibits: RA1- RA9
Date:07/01/2026

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N :-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

WITNESS STATEMENT OF
[Robert Archer]

I, Robert Archer, of Traffic and Highway Maintenance, 100 Temple Street, Bristol, BS1 6AG will say as follows:

1. I am employed by Bristol City Council as the Highways Technical Officer in the Highway Maintenance and Assets Team and am duly authorised to make this statement. Part of my role includes highways responsibility for the streets named Parrys Lane, Saville Road, Downleaze, Rockleaze, Circular Road,

Westbury Park, Clay Pit Road and Roman Road, Durdham Down in the Wards of Stoke Bishop & Westbury on Trym & Henleaze.

2. Bristol City Council is the Highway Authority and as such responsible for the maintenance of the street. Please refer to **Exhibit RA1,** a plan showing the extent of the adopted highway for all roads maintained by Bristol City Council on land owned by Bristol City Council's Downs Committee.

3. Our Highway Register (list of streets maintainable at the public expense) shows that Parrys Lane is an adopted highway but does not provide the date of formal adoption. Please refer to **Exhibit RA2** the relevant extract from the Highway Register.

4. Parrys Lane is also part of the B4054 classified road and is represented in blue on Exhibit RA1. The B4054 is a principal route and its constituent streets connect Cheltenham Road, Montpelier to Portway Roundabout, Avonmouth. In this case the lower fork of Parry's Lane crossing the Downs Committee land was in existence before 1835 and as a principal route it would have been automatically adopted under the 1835 Highways Act.

5. Our Highway Register (list of streets maintainable at the public expense) shows that Saville Road is an adopted highway but does not provide the date of formal adoption, however the official name for the street was confirmed by Committee on 21/10/1924. Please refer to RA Exhibit 3, the relevant extract from the Highway Register.

6. Our Highway Register (list of streets maintainable at the public expense) shows that Rockleaze is an adopted highway and gives the year of adoption as 1902. Please refer to **Exhibit RA4** the relevant extract from the Highway Register.

7. The neighbouring roads Rockleaze Avenue and Rockleaze Road were adopted on 23/10/1902.

8. Our Highway Register (list of streets maintainable at the public expense) shows that Downleaze is an adopted highway and was adopted in the year

1902. Please refer to **Exhibit RA5** the relevant extract from the Highway Register.

9. Our Highway Register (list of streets maintainable at the public expense) shows that Circular Road is an adopted highway but does not provide the date of formal adoption. Please refer to **Exhibit RA6** the relevant extract from the Highway Register.

10. Circular Road was formerly part of Seawalls Road which was adopted on 11/01/1902. Please refer to **Exhibit RA7**, the relevant record from the Highway Register. The name Seawalls Road no longer exists as an official street name.

11. Our Highway Register (list of streets maintainable at the public expense) shows that Clay Pit Road is an adopted highway but does not provide the date of formal adoption. Please refer to **Exhibit RA8** the relevant extract from the Highway Register.

12. Clay Pit Road connects Westbury Road to Westbury Park and as it was in existence before 1835 it would have been automatically adopted under the 1835 Highways Act.

13. Our Highway Register (list of streets maintainable at the public expense) shows that Westbury Park is an adopted highway and was adopted on 08/07/1878 and two footpaths associated with it were adopted on 07/06/1904. Please refer to **Exhibit RA9** the relevant extract from the Highway Register.

14. Roman Road is an adopted highway on the land owned by Bristol City Council's Downs Committee. It is not specifically mentioned in our Highway Register (list of streets maintainable at the public expense) as it was an unnamed road and not officially named Roman Road until 1998 to distinguish it from the classified roads to which it connects which are the A4018 Westbury Road and C108 Stoke Road. It is on the site of an ancient Roman Road hence the name.

Statement of Truth

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

13/01/2026

X R Archer

Robert Archer
Highways Technical Officer
Signed by: BRLSRAA

Signed..... Dated.....

On behalf of: Claimant
Witness: Robert Archer

]

Statement: 1st
Exhibits: RA1- RA9
Date:

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

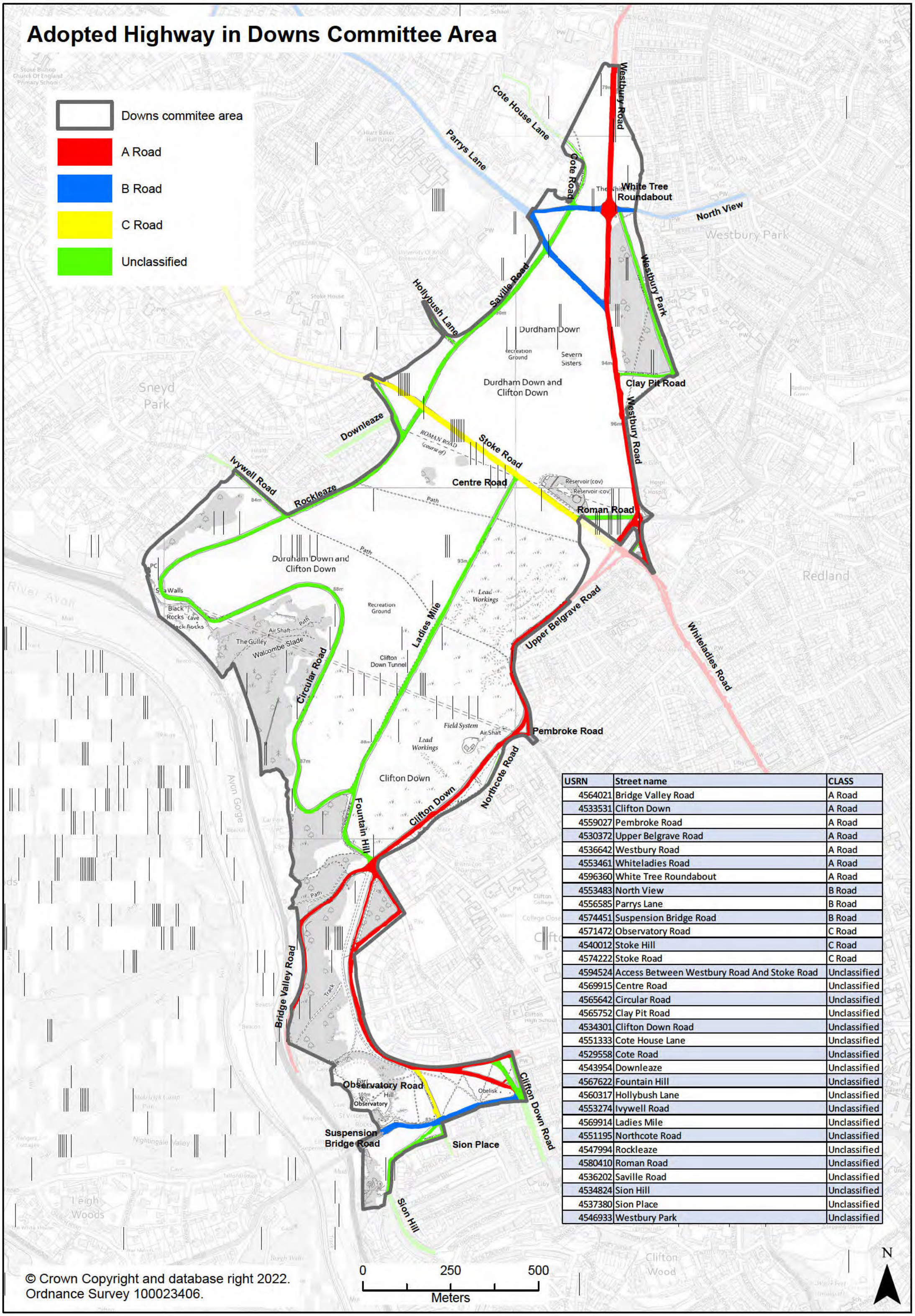
AND

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

Defendants

EXHIBIT RA1

Adopted Highway in Downs Committee Area



USRN	Street name	CLASS
4564021	Bridge Valley Road	A Road
4533531	Clifton Down	A Road
4559027	Pembroke Road	A Road
4530372	Upper Belgrave Road	A Road
4536642	Westbury Road	A Road
4553461	Whiteladies Road	A Road
4596360	White Tree Roundabout	A Road
4553483	North View	B Road
4556585	Parrys Lane	B Road
4574451	Suspension Bridge Road	B Road
4571472	Observatory Road	C Road
4540012	Stoke Hill	C Road
4574222	Stoke Road	C Road
4594524	Access Between Westbury Road And Stoke Road	Unclassified
4569915	Centre Road	Unclassified
4565642	Circular Road	Unclassified
4565752	Clay Pit Road	Unclassified
4534301	Clifton Down Road	Unclassified
4551333	Cote House Lane	Unclassified
4529558	Cote Road	Unclassified
4543954	Downleaze	Unclassified
4567622	Fountain Hill	Unclassified
4560317	Hollybush Lane	Unclassified
4553274	Ivywell Road	Unclassified
4569914	Ladies Mile	Unclassified
4551195	Northcote Road	Unclassified
4547994	Rockleaze	Unclassified
4580410	Roman Road	Unclassified
4536202	Saville Road	Unclassified
4534824	Sion Hill	Unclassified
4537380	Sion Place	Unclassified
4546933	Westbury Park	Unclassified

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Ordnance Survey 100023406.

On behalf of: Claimant
Witness: Robert Archer

]

Statement: 1st
Exhibits: RA1- RA9
Date:

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

EXHIBIT RA2

Name of Highway	District	O.S. 1/2500	on Highway Plan	length ~~yards~~ km	Date of Adoption	Vol.	No.	Date of Boundary Extension Cross References Declaration as New Street, etc.
Parkside Gardens	Stapleton			~~200~~ 0.18	21.3.1962			Whole length Rear access to No. 27 adopted 1.875
Parkstone Avenue	Horfield			~~154~~ 0.14	2.10.1931			Complete.
PARKWAY THE	STAPLETON		A-B	~~2,450~~ 3.15	26.09.1972			M32 STAGE1 MULLER RD - CITY BOUNDARY
PARKWOOD CLOSE	WHITCHURCH		A-B	0.19		27	7	
Parliament Street	Totterdown			0.05				Summer Hill to Park Street. Complete.
Parnall Road	Fishponds			46 125 0.16	9.12.1908 5.7.1911			Justice Road to Midland Railway Remainder of
Parrys Close	Stoke Bishop			~~378~~ 0.35	24.3.1954			Whole length
Parrys Lane and 2 roads	Stoke Bishop			1.80				B4054 Fork Roads at Downs to Druid Stoke Ave. Widened R.W.1921 & 1926 And Two roads to Westbury Road.
				6.02 Total.				

On behalf of: Claimant
Witness: Robert Archer

]

Statement: 1st
Exhibits: RA1- RA9
Date:

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

EXHIBIT RA3

Name of Highway	District	O.S. 1/2500	Section on Highway Plan	Approx. length yards km	Date of Adoption	Disposal Vol.	Disposal No.	Remarks Date of Boundary Extension Cross References Declaration as New Street, etc.
Saunton Walk	Filwood Park			~~43~~ 0·04	27.7.1939			Whole length
Saville Road	Durdham Down			0·66				Complete. Top Stoke Hill to top of Parrys Lane name confirmed by Committee 21.10.1924
Savoy Road	Brislington			203	25.11.1936			Part 1-49 & 2-46
			B-C	278 0·37	26.6.1940			Nos. 48-94 & 57-97
Saxon Redd X	St.Werburghs			131 0·15	29.6.1907			~~Parts~~ First part
				33 48 c.w.	11.2.1937			Remainder of
SCANDRETT CLOSE	HENBURY		C-D-E-G-	173 D.F.D 0·20	24.7.1973			COMPLETE
School Close	Whitchurch		A-B	155 0·14	6.4.1966			Whole length
School Lane	Stapleton			457 0·14				Broom Hill (Frome Bridge) to Brinkworthy Road
				1·72 Total				

On behalf of: Claimant
Witness: Robert Archer

]

Statement: 1st
Exhibits: RA1- RA9
Date:

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

EXHIBIT RA4

	Name of Highway	District	O.S. 1/2500	Section on Highway Plan	Approx. length yards ~~km~~	Date of Adoption	Disposal Vol.	Disposal No.	Remarks Date of Boundary Extension Cross References Declaration as New Street, etc.
	Rock Court,	Clifton		67	0.01				Cul de sac 40 years Cored. July 1966
	ROCKLAND GROVE	STAPLETON		B-E	~~141~~ 0.13	28.9.1971			FOOTPATH ALSO VEHICULAR SECONDARY ACCESS
	Rockleaze	Sneyd Park.			~~252~~ 0.23	1902			Complete. Julian Road to Ivywell Road
	Rockleaze Avenue	Sneyd Park.			~~178~~ 0.13	23.10.1902			Complete.
	Rockleaze Road	Sneyd Park			~~208~~ 0.19	23.10.1902			Complete.
	Rockside Drive	Henleaze			~~323~~ 0.30	13.11.1934			Henleaze Road to Hill View Complete.
	Rodbourne Road	Horfield			178	1.1.1941			From Bishopthorpe Road Southwards
					33	18.3.1954			Further portion
		1.71 Total			0.72 550	11.7.1956			Remainder of

On behalf of: Claimant
Witness: Robert Archer

]

Statement: 1st
Exhibits: RA1- RA9
Date:

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

EXHIBIT RA5

Name of Highway	District	O.S. 1/2500	Section on Highway Plan	Approx. length yards KM	Date of Adoption	Disposal Vol.	Disposal No.	Remarks: Date of Boundary Extension, Cross References, Declaration as New Street, etc.
Downend Road,	Horfield.			230				Complete Ashley Down Road to Dover court Road
				435.				Ashley Down Roadto gate of old Sewage Works
				198.	11.5.1934.	18	115	Remainder of to Dovercourt Rd.
				0·69				
Downfield Road.	Clifton.							Beaconsfield Road to Pembroke Road & also to lane to Wellington Park. Complete.
				151.	24.6.1881	3	39	
				90.	13.1.1886.	4	3	
				35.	13.1.1886.	4	4	
				108.	30.11.1893	5	32	
and lane.				27.	30.11.1893.	5	33	To Wellington Park.
				0·38				
Downleaze.	Stoke Bishop.			398.	1902.	1A	34	
				103.	1902.	1A	35	
				0·46				
Downleaze Road.	Stoke Bishop.			0·22				Complete Julian Road to Downleaze.
Downman Road	Horfield.		A-B	303	23.9.1969	27	91	
			M-N	65	23.9.1969	27	92	
				0·34				
Downs Road.	Westbury on Trym.			186.	27.2.1928.	16	40	Cul-de-sac.
				0·17				
				2·26 Total.				

On behalf of: Claimant
Witness: Robert Archer

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EXHIBIT RA6

Name of Highway	District	1/2500	Section on Highway Plan	Approx. length yards KM	Date of Adoption	Vol.	No.	Date of Boundary Extension Cross References Declaration as New Street, etc.
Churchways Crescent.	Norfield.			148.	18.4.1906.	11	43	From Churchways Avenue.
				131. 0.160	25.7.1910.	14	14.	From above.-Complete. S.W.
Churston Close.	Whitchurch.		A-B.	0-04	31.7.1063.	24	125.	Whole length.
Chyebassa Alley.	St George.							Complete, Lane from Speedwell Road to Pit Lane.
"Circular Road"	Shirehampton.		Part	55	26.3.1928.	16.	47	(ie, Road "Inside" The Crescent) Shire Road to W.Parade.
			Part	54.	26.3.1928.	16.	47.	Shire Road to E.Parade.
			Centre portion.	67. 0.161	26.3.1928.	16.	47.	Remainder of.
"Circular Road"	Sea Walls.			1.76				Ivywell Road to Centre Road.
City Road.	St Pauls.			550.	18.8.1874.	2.	1.	Complete.
				67. 0.561	23.9.1871.	1.	130.	Portion known as Franklyn Terrace

On behalf of: Claimant
Witness: Robert Archer

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EXHIBIT RA7

Name of Highway	District	O.S. 1:500	on Highway Plan	length yards KM	Date of Adoption	Vol.	No.	Date of Boundary Extension Cross References Declaration as New Street, etc.
Seagry Close	Southmead			~~57~~ 0.05	22.5.1940			Whole length
Seal Street	Easton			~~133~~	2.3.1863			
				~~53~~ 0.19	12.5.1882			Complete. Closure of the whole authorised 13.1.67
Searle Court Ave	St.Annes		A-B	~~99~~ 0.09	26.6.1940			1-99 & 2-20
Seaton Road	Easton			~~77~~ 0.07	3.7.1913			Complete.
Sea Walls (Road around)								
Seawalls Road	Sneyd Park			175 101 0.25	11.1.1902			Complete.
Secad Way, Avonmouth Associated Footways				0.152 = 420 + 1449 Footways 0.149. + 0.268 30.3.82 ~~0.569~~ 20.9.82. 0.569 Total				

On behalf of: Claimant
Witness: Robert Archer

]

Statement: 1st
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EXHIBIT RA8

Name of Highway	District	O.S. 1/2500	on Highway Plan	length yards km	Date of Adoption	Vol.	Fo.	Date of Boundary Extension Cross References Declaration as New Street, etc.
Clay Pit Road.	Westbury Park.			0.15 area				North of Durdham Park. Westbury Road to Westbury Park. Complete.
Clayton Street ✓	Avonmouth.			~~0.17~~ 136.	? 1902.	1.A.	14	
and lane. ✓				66.	28.12.1907.	12	39	To Meadow Street. rear Gloucester Rd.
and lane. ✓				66.	28.12.1907.	12	38	To Meadow St. rear Queen Street.
				0.240				
Clayton Street.	Easton.					-	-	Cul-de-sac off Brixton Road.
Cleave Street.	St Werburgh's.			100.	2.8.1902.	9.	12	
				~~0.11~~ 19.	7.9.1904.	10	48	Complete.
				0.109				
Clee ve Road.	Knowle.			85.	5.9.1906.	11	89	From Harrowdene Road.
				89.	24.6.1908.	12	80	Complete.
				0.160				
Clement Street.	St Paul's.		Part.	~~227.~~	10.3.1885.	3	109	Moulton Street to Newfoundland Road Complete.
				0.208				
				broken road				

On behalf of: Claimant
Witness: Robert Archer

]

Statement: 1st
Exhibits: RA1- RA9
Date:

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EXHIBIT RA9

Name of Highway	District	1/2500	Highway Plan	Length yards / Km	Date of Adoption	Vol.	No.	Cross References Declaration as New Street, etc.
Westbury Court Road	Westbury		A-B	~~118~~ 0.20	5.5.1937			Falcondale Road to Fraley Road (no. 12 & 13) Name changed from Fraley Ave 13.12.1934
			B-C	~~130~~	12.12.1963			Remainder of to High Street
Westbury Park X	Durdham Down			214	7.6.1904			Redland Road to Westbury Road Footpath
				216	8.7.1878			Footpath
				0.42				
Western Place X	Hotwells			~~172~~ 0.16				Complete. Brunswick Place to Oldfield Place.
Western Road	Horfiel d			~~95~~ 0.09	14.6.1927			Complete. Gloucester Road to common. Subsequently extended to Wellington Hill as Weston Cres.
~~Western~~ Square	Cumberland Basin							Closed 7.11.1963 Cumberland Basin Bridges Scheme.
Westfield Park	Redland			PARTS 175	31.8.1871			Whiteladies Road to Ashgrove Road
				22	5.4.1884			Complete.
				0.26				
				1.13 Total				

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibits: KJ01-KJ17
Date:04.02.2026

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

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WITNESS STATEMENT OF KURT JAMES

I, Kurt James of The Neighbourhood Enforcement Team, Bristol City Council, 100 Temple Street, Redcliffe, Bristol, BS1 6AG will say as follows:

Introduction

1. I am employed by the Claimant as the Neighbourhood Enforcement and Street Scene Manager within Bristol City Council and hold strategic responsibility for the authority's operational response to individuals residing in vehicles on the public

highway. In this capacity, I provide oversight of enforcement activity, ensures that actions taken by Council officers comply with relevant legislation and statutory duties, and coordinates the multi-agency approach adopted by the local authority. My role includes setting operational direction, authorising proportionate interventions, and ensuring that the Council balances enforcement requirements with its safeguarding responsibilities and wider public-interest considerations.

2. In making this statement I have had access to the Claimant's computer systems. I have also liaised with colleagues within my Directorate and elsewhere, Members, Officers of Avon and Somerset Constabulary, other partner agencies and members of the public. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. I also refer to the Witness Statements of Caroline Ennion served in these proceedings, and which set out information in relation to the Downs and problems of trespass thereon. A number of the issues she addresses also apply to trespasses on the Highways surrounding and crossing The Downs and which are the subject of the Claimant's applications. The problems she discusses are also prevalent upon the roads which were not part of the possession proceedings under Claim No. M00BS958.

3. I make this statement to outline to the Court the Claimant's plans in relation to removing vehicles from the Highways, and extending the current Newcomer Injunction to restrain future trespasses onto them.

4. After considerable discussion with colleagues and others as outlined at paragraph 2 of this statement, the Council's approach on enforcement is proposed to take two different courses of action. The first is going to either seek to vary the possession order under Claim No.M00BS958 or begin separate possession proceedings in respect of the Highways. For everyone's benefit I will confirm that we have a Writ of Possession under that Claim Number for the areas subject to those proceedings which is yet to be enforced. I attach a plan of the Downs and

surrounding areas. **Exhibit KJ01**. The land with red and green hatching is the subject of the possession order. The land shaded blue are the Highways which are namely Parrys Lane, Saville Road, Clay Pit Road, Westbury Park, Rockleaze, Downleaze, Roman Road, Stoke Road, Wills Lane and Circular Road ('the Highways') we may seek to include in the varied possession order, or be the subject of separate proceedings. Stoke Road and Wills Lane are Highways which are not yet trespassed upon but which are very likely to be subject to trespass if not included in the proceedings. The second is to request an extension of the current Injunction granted on 25 July 2025 concerning Durdham Down, Clifton Down and Ladies Mile ("the Downs"). **I refer to the Injunction marked Exhibit KJ02**.

5. The Claimant is the Highways Authority and is responsible for the Highways namely, Parrys Lane, Saville Road, Clay Pit Road, Westbury Park, Rockleaze, Downleaze, Roman Road, Stoke Road, Wills Lane and Circular Road which are unclassified adopted roads. (Evidence showing, we are the Highways Authority are contained in the statements of Robert Arrcher).

6. I attach a map of the Highways which we seek to include in the Injunction extension as **Exhibit KJ03**.

7. As Caroline Ennion explains The Downs is intensively used for public recreation, including:

    - Informal walking and exercise.
    - Team sports, including permanent football pitches used by the Bristol Downs Football League.
    - Large scale outdoor events including circuses, charity events, temporary attractions, and the annual Downs Festival.

    The area remains open to the public all year-round and forms a significant strategic green space within the city's environmental and recreational infrastructure. The Highways are therefore an integral part of providing that facility

to the public and although events do take place the amount of parking space available is significantly reduced by the number of vehicles located on the Highways. In addition, as I will go on to explain in this statement there are significant areas near the Highways encampments where there are considerable issues with the deposit of rubbish and waste material with the health problems that engenders.

Background

8. In 2020 prior to the pandemic, Bristol had an estimated 150 vehicle dwellers citywide, with early informal encampments beginning to appear on the Downs. Pressure from housing costs and limited affordable options already contributed to slow but noticeable growth.

9. The COVID-19 period brought significant change: job losses, social-distancing needs, and reduced access to housing pathways increased vehicle dwelling across Bristol. The number of vehicle dwellers began rising sharply, laying the groundwork for the later concentration on the Downs.

10. As numbers climbed (eventually reaching 600–680 vehicles citywide), the Downs became a major hotspot due to roadside parking and accessible green space. Residents and community groups started to raise concerns about the growing encampments, citing environmental and amenity impacts.

11. The problem of trespasses onto the grassed areas of The Downs and particular Ladies Mile has been addressed by possession proceedings and the subsequent Injunction in these proceedings. The Injunction has successfully abated the frequency and extent of trespasses onto the grassed areas, to enable the public to enjoy community events in a much safer way.

12. The Claimant made a pragmatic decision in 2025 not to include Highways, because the number of vehicles encamped for a considerable period of time would have made enforcement potentially unmanageable. Particularly having regard to

the number of checks and balances that would have had to be undertaken, including, not only welfare assessments, but the logistical planning required for what would have been a substantial enforcement exercise.

13. The successful enforcement of the Injunction has not resulted in either a substantial increase or decrease on the number of vehicles on the Highways, because we are in general speaking about two or more distinct groups of people of substantially different backgrounds.

14. As a result of the continued encroachments onto the Highways following 2020 the profile of the Downs encampments have been raised at a both local and national level.

15. For example, during 2025 there have been a number of articles and reports in various media including the BBC nationally and the Guardian Newspaper, public meetings held in areas near the Downs (e.g., St Alban's Church, Westbury Park) which reportedly drew hundreds of residents and vehicle dwellers, highlighting community divisions and demands for intervention. This also followed a series of representations to the Claimant, and questions put to Full Council taking advantage of the Claimant's open access arrangements.

16. The group Protect the Downs ('PTD') began fundraising (from £40k rising to £50k) to take legal action against Bristol City Council over its alleged failures to manage vehicle dwelling on the Downs, especially regarding environmental damage and lack of enforcement. Solicitors representing PTD have written to the Council suggesting a number of provisions (mostly statutory which are engaged by the trespass at the Highways. No detail has been provided, but it is not difficult to identify a number of these including the duty to assert and protect the right of public to use the Highway s.130 Highways Act 1980. I will address some of these points further on.

17. The Claimant succeeded in obtaining a court Injunction preventing people from living on the grassed areas of the Downs (This being the Injunction Exhibit KJ02

obtained by the Parks department as outlined in the witness statements of Caroline Ennion). This marked the first major escalation in enforcement specifically targeting the area.

18. A large community meeting (20 October 2025) again highlighted public frustration, including complaints of environmental degradation, human waste, litter, and exhaust fumes affecting residential areas bordering the Downs. Reports indicated 60–70 lived-in vehicles stationed on the Downs at this time.

19. During the Summer of 2025 visits by Officers from the Neighbourhood Enforcement Team however identified in excess of 100 occupied vehicles to be present on the public highway surrounding the Downs. Issues noted included human waste around vehicles and surrounding areas.

20. During July 2025 a local resident raised concerns with the Neighbourhood Enforcement Team regarding overflowing bins with paper and human faeces evident, reference to an open cess pit and issues of vehicles and vehicle maintenance. **Exhibit KJ04.** These issues again being raised by the local resident in October 2025. **Exhibit KJ05**.

21. During October 2025 the Neighbourhood Enforcement Team were also provided with a map by Bristol Parks Department, following receipt of the complaint of the local resident identifying areas around the Downs suspected to be used for toilet waste. This map identifying areas where human waste had been regularly cleared by Parks officers and also public bins where bagged human waste had been regularly deposited. **Exhibit KJ06.**

Public Health risk

22. On 21 October 2025 Neighbourhood Enforcement Officers Steve Eyers and Tim Bird attended the Parrys Lane area of the Downs following receipt of the report. Following a search of wooded areas located on The Downs, evidence was found as described of serious human waste issues within the bushes and woodland

surrounding Parrys Lane. I have annotated these issues by number marking the areas at, **Exhibit KJ07**. This triggered the formal designation of the Downs encampment as “high impact”, the threshold requiring enforcement action under the Vehicle Dweller Policy existing at that time. **Exhibit KJ08.** The Claimant has a new policy to cover 2026 – 2031. A number of themes in this new policy are engaged by the presence of the Vehicles on the Highways and would be classed as causing a serious impact on the local community, environment or location.

These include:

- **Highways management and obstruction** – the significant number of vehicles causes obstructions for access for a variety of purposes and events.
- **Crime and Anti-social behaviour** – there is a considerable body of evidence within this statement which indicates problems under this heading.
- **Location** – The Downs must be classified as a sensitive location as there is an increased risk related to public health, safety, environmental health among other things.
- **Environmental impact** – human waste comes within this consideration as does fly tipping. Both this statement and that of Caroline Ennion refer to considerable incidents of environmental problems.

23. Bristol Waste teams were deployed to clear hazardous waste, with return visits planned due to the scale of contamination. The cost of clearances is set out below at paragraph 41. That in the context of the expenditure to which Caroline Ennion refers maybe less significant, but it is well known that exposure to human faeces does carry a number of health risks. Councillors issued public statements calling the sanitation situation “unacceptable” and a significant public health issue. I do not disagree with that description as the risks are many and varied.

24. During November 2025, following the discovery of the human waste in woodland and bushes around the Downs by the NET, along with receipt of the Parks report, I completed a briefing sheet for councillors and committee within Bristol City Council, outlining the need for enforcement action. This report referenced as

Exhibit KJ09, requesting authority to commence action in the area for removal of occupied vehicles.

25. Although not perhaps set out in detail in my report, I did consider a number of other options in an attempt to deal with the problem of human waste. The only conclusion that I could draw was possession proceedings and extension of the Injunction because of the situation we were faced with. There are as a mean average about 80 occupied vehicles across The Downs and assuming at least 50% are occupied by more that one person that would mean approximately 120 people of various ages and states of health. To provide a safe environment the Council will have had to fund 10 Portaloos and the associated collection, cleaning and replacement costs. Whilst it is one thing to provide those for events on The Downs there are a number of differences:

    a. The organiser of the events pays for this themselves
    b. The portaloos they provide are for the event and are limited to time and duration. It is not the function of providing portable toilets for long term occupation of an area.
    c. Even if that might be the model for a Meanwhile Site the point arises that a Meanwhile site is not meant to be substantial long-term accommodation.
    d. Furthermore, the Meanwhile site is an area which has the benefit of planning permission where the Council has given details as to how human waste is going to be safely collected and disposed of. There will be other requirements and recommendations in relation to the number of vehicles on a Meanwhile site or other travellers, and I refer, for example to Department of Environment Circular 18/94.
    e. In addition, we are talking about encroachment of vehicles on an area on public open space and adopted Highways neither of which are designated or can be designated as a location upon which a residential encampment can be provided. The starting point being the Claimant's own obligations to providing Highways which are capable of being used without obstruction, environmental and planning considerations to which

Ms Ennion refers, as well as the impact upon citizens and visitors in Bristol having free and unimpeded access to The Downs as a public facility, as explained by Ms Ennion in great detail, as well as the material produced by PTD (not all of which is anecdotal).

26. From 2020 onwards, the Downs has seen a transition from minor encampments to one of the largest and most contentious vehicle-dwelling sites in Bristol. There are of course a number of people who advocate on behalf of the vehicle dwelling community, and over the last couple of years members of my team and myself have had considerable discussions with the vehicle dwelling community in a variety of situations and it is the case that the vehicle dwelling community has a very wide and diverse background. Other parts of the Council work assiduously with members of the vehicle dwelling community in relation to the provision of sites. Other partner agencies, St Mungos engage regularly with travellers across the city. It is not only the Claimant's land upon which travellers encamp. Due to the issues of finding sites and creating them and supporting them, it is not an easy task, and the number of available sites compared to the number of people living in vehicles creates a significant imbalance. The upshot is that vehicle dwellers sometimes position themselves in locations which create a number of tensions with the local community, because the locations do not support long term, medium term or sometimes short-term provision. The lack of facilities then can lead to a deterioration in the environment in which the encampments are located, and this has been the case with The Downs.

27. The deterioration at The Downs follows a clear pattern:

- Rising numbers due to systemic housing pressures.
- Community frustration expanding into organised activism.
- Verified sanitation hazards prompting official "high-impact" designation.
- Increasingly assertive council intervention, including injunctions.
- Persistent legal, environmental, and public health tensions.

28. I do not want for this to come across as a broad-brush approach and attributing

some of the more significant problems to all of the travelling community, but The Downs has followed the below pattern.

29. Substantial and repeated complaints relating primarily to:

- Human waste and sanitation hazards.
- Littering and environmental damage.
- Crime and anti-social behaviour.
- Public health and safety concerns.
- Overuse of the Downs by 80–110 lived-in vehicles.

Complaints have come from individual residents, community groups, public petitioners, and elected councillors—building a strong case that the issue has become a major public concern in Bristol. Again, I refer to Ms Ennion's very substantial explanation and analysis of the problems on The Downs.

Complaints recorded since 2020 through NET records which include Webform receipts and emails directly to the VDE email address show a dramatic increase as follows:

- 2020 – 130 Reports received.
- 2021 – 44 Reports reduced due to pandemic.
- 2022 – 51 Reports received due to pandemic.
- 2023 – 101 Received.
- 2024 – 159 Received.
- 2025 – 254 Received to (April 2025 to date).

30. **Littering and Environmental Damage.** Significant increases in litter, fly-tipping, and general waste have been reported, with residents and councillors highlighting a decline in the cleanliness and accessibility of the area. Some community groups report environmental harm, including to sensitive areas of the Downs.

31. **Human Waste and Sanitation Concerns.** Council inspections and complaints have identified several areas of the Downs being used as makeshift toilet sites. These locations have been found "filled with human waste," posing a clear public

health risk to park users, and particularly to children and pets. Items such as water bottles and tissues were discovered, indicating regular use and linking the waste directly to groups living in vehicles.

32. **Human waste and accumulated rubbish** are discouraging many residents from using the Downs, which has traditionally been one of Bristol's most valued recreation areas. This has been reflected in the increase in complaints regarding the occupied vehicles and from evidence provided by residents.

33. **Antisocial behaviour**, including reports of fights, drug activity, and inappropriate behaviour in public spaces. Community action groups claim these issues have become "a daily occurrence" in some areas. Some families have reported worrying incidents, including children encountering human excrement while playing.

34. **Community group:** The situation has become increasingly divisive. Groups such as Protect the Downs (PTD) were formed in response, with over 8,000 signatures calling for action to remove vehicle dwellers. PTD has also initiated as I have said, legal action against Bristol City Council over what it sees as failures to protect the environment and enforce relevant legislation.

35. **Inappropriate parking**: This is due to large numbers of vehicles parked along kerbside areas affect parking availability, visibility for drivers, and access for pedestrians, cyclists, and maintenance vehicles. Residents express concerns that parts of the Downs are becoming "no-go zones." I do not necessarily subscribe to that view, but as I have demonstrated in this statement there are a significant number of problems now and there is no alternative but to take legal action.

36. **Improper disposal of excrement in public spaces**—including leaving it on the ground or placing it in public litter bins—poses significant health and environmental risks.

37. **Water Pollution**: Rainfall can wash faeces into drains and waterways, introducing harmful bacteria and nutrients that pollute rivers and damage local ecosystems.

38. **Pests and Odour**: Waste in open areas or public bins attracts vermin and produces strong odours, creating nuisance and hygiene problems for the community.

39. **Environmental Harm**: When faecal waste enters general waste streams, it contributes to greenhouse gas emissions such as methane, which significantly impacts climate and air quality.

40. **Expenditure on human waste removal**: Mark Parsons (Contract Manager) from Bristol Waste Company has explained that they have visited the area twice a month removing waste. He explains that he does not always find waste, but when he does the costs comprise of the following. Staff cost £1,078.40 Supervisor £207.84 and Disposal £78.00. Total cost £1,364.24. This amount is not insignificant if done twice every month. Again, I make the point here that these are the sorts of costs and issues associated with maintaining an unauthorised encampment. Similar costs would of course be incurred on a Meanwhile site because they have to comply with government guidance and statutory provisions. Neither of these consideration is compatible with an area of significant public open space such as The Downs being used as a site for vehicle dwellers.

The Council's Response

41. Following the confirmed human waste findings, the Council announced plans to commence Enforcement action preventing people from living in vehicles on all roads around the Downs—a far broader and more complex legal step than the earlier grass-area injunction. I will outline below the proposed courses of action.

42. This process commenced on 2nd December 2025 when I attended the area along with officers from the Neighbourhood Enforcement team, who visited Parrys

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

43. A total of 87 believed Occupied vehicles were visited and welfare questionnaires were completed with any occupants willing to engage with the visiting officers. **Exhibit KJ10.** Any vehicles unoccupied at the time of the visit were left an information pack requesting the occupants to contact Bristol City Council to identify any welfare needs of the occupants. **Exhibit KJ11**.

44. Images were taken of all occupied vehicles within the area of the Downs during this visit by Senior Neighbourhood Enforcement Officers Steve Eyers and Megan Davis of the Neighbourhood Enforcement Team and are produced as photo albums, **Exhibit KJ12.**

45. All vehicles whether attended or unattended were also left a letter requesting the vehicle and its occupants to vacate the area within 7 days, which also contained a map of the area subject to the request to vacate. **Exhibit KJ13.** The letter was in the form of a request to vacate the land; I am fully aware of the legal processes of actually moving any vehicle trespassing on The Downs and the analysis which has to go with the actual decision. So, in the event of enforcement action being taken I have conducted a review of the details provided by the welfare assessments, alongside the reports of complaints arising from the vehicles on the site and the environmental considerations including public health (as described in both this witness statement and those of Caroline Ennion).

46. On 11 December 2025 in company with Officers from the Neighbourhood Enforcement Team, I again visited the Downs to revisit vehicles that had been unattended during the visit conducted on 2nd December 2025 for welfare checks. **Exhibit KJ14.** Images were also taken during this visit by SNEO Steve Eyers **Exhibit KJ15.**

Welfare assessments / Equality considerations

47. As detailed above the Neighbourhood Enforcement team attempted to complete welfare assessments on 2 and 11 December 2025 with the occupants of the vehicles. Upon attending, it was noted that some vehicles were unoccupied and therefore welfare assessments could not be completed on both visits. In those circumstances and as detailed above letters were affixed to their vehicles clearly detailing the proposed action and how they could get in contact with the NET for welfare assessments to be conducted. Other occupants that were present during attendance were either unwilling to provide details and engage or became hostile meaning welfare assessments could not be conducted. However, there were several occupants who did engage with the process and welfare assessments were successfully conducted. I detail the findings of all welfare assessments in a prepared table at **Exhibit KJ16.** Some personal information was given, to preserve anonymity and having regard to data protection issues generally I have anonymised as necessary the identity of the persons to who we spoke to and I have been careful not to attribute any characteristics or vulnerabilities mentioned to a vehicle, that can be identified. So for example, we will have spoken to occupant 3, 5 and 7 who would have revealed some personal information so they are described as occupants 3, 5 and 7. The vehicles on for example Circular Road will be described as vehicles 1, 2, 3 etc, but occupant 3 is not going to be the occupier of vehicle 3.

48. I acknowledge that several occupants notified us that they suffer from mental health problems, notably Depression, Anxiety, PTSD and ADHD. The Claimant is mindful of its duties under s.149 of the Equality Act 2010, the Public Sector Equality Duty ('PSED'), which requires public authorities to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations for individuals who share protected characteristics, such as disability, which encompasses those with mental health and physical health issues. Even though the Claimant through its welfare assessments could not ascertain with certainty whether the occupants satisfy the legal definition of being disabled, I nevertheless am considering them as disabled persons for the purposes of the Act. I seek to ensure that our actions are proportionate with any decisions I make. I now consider the responses which were given and the actions taken by us, and these are set out on the table I produce as **exhibit KJ17**.

49. I seriously considered the impact on those individuals with potential protected characteristics while balancing this against our duties as a local authority to alleviate the ongoing public health issues caused by the encampments on the public highways around The Downs. I therefore started from the point that I could leave a number of caravans in situ, particularly where there were strong indications that the occupant did not want accommodation in the form of a house or flat from the Council. Obviously at the moment there is a scarcity of Meanwhile site places. So, could I leave any caravans or other vehicles in place? The answer has to be, I cannot, there are a number of legal and practical problems establishing in any way a site for the travelling community and including within that, leaving vehicles where they are given the overall nature of the Downs and the problems which are being caused it cannot be done. The constant presence of the vehicles on the Highways contravenes a number of statutory provisions. In any way which could alleviate the public health and other problems which I have discussed. In addition, there is going to be the not insignificant problem of the presence of vehicles then attracting other van dwellers.

50. A vehicle dweller who wanted stable residential accommodation and was entitled to it would be favourably received by St Mungos and the homelessness team if they met the statutory criteria.

51. That now leaves two distinct groups of people. The first would be people who wanted that type of accommodation but to whom we did not owe a statutory duty, although there would certainly be the facility of the provision of temporary accommodation pending enquiries being made as to their eligibility. If it turns out there was no ability to do that or any statutory duty owed, then it might be that the Council's private rented team would be able to help.

52. In addition, where persons have disclosed mental health concerns I would also make sure that before we start action their details were notified to Adult Social Care so that they could make sure that there are no outstanding statutory obligations owed to those individuals, and would also be put on notice of other

persons who were not known to the Council potentially seeking their advice and support.

53. Through conducting these assessments, we have listened to the needs of the occupants and have made and will make referrals to appropriate departments within the Council as partner agencies such as St Mungos.

54. Last year there was the aspiration of finding a significant number of Meanwhile sites. A potential figure was put forward as an aim (250), but at the time of writing this statement there are 79 pitch spaces on Meanwhile sites. 67 of these pitches are occupied, 9 have been offered and are awaiting responses, which leaves 3 vacant pitches where no offers have yet been made. There are also four other Meanwhile sites which are currently at the planning permission stage. I would hope that some of the occupants on the Downs will be eligible for and will be able to be accommodated on one of those sites. I accept that this still leaves a gap in the provision of accommodation against the number of occupied vehicles but that is sadly unavoidable.

55. So, what happens with all the other vehicles? It may well be that a number of the persons on the Downs who are the Defendants in these proceedings, will simply leave either when proceedings are served or after the order is made and put up around The Downs. If not, then the Council will take enforcement action by way of a Writ of Possession, and any further trespasses will be prevented by the extension of the Injunction to the Highways crossing The Downs.

56. My interim plan is that the current possession order may be made a subject of an Application to extend it to the Highways crossing the Downs or as that is already at the enforcement stage we may just issue a fresh possession action. If that is granted and a number of people do not leave, then we will have to take enforcement action. It will be impossible, from a resources point of view (personnel, equipment, and logistics) to move every vehicle from the roads in one day. Furthermore, the knock-on effect on other Council departments of people seeking assistance will be unmanageable. There is also the difficulty of what we

do with vehicles which are going to have to be towed. The first question of this is whether the vehicles will be moved to a secure location, and how the owner of the vehicle will have access to his or her belongings. The second question is how dangerous or unroadworthy vehicles can be moved and stored. The third question is how vulnerable persons will be supported during this process, and I will make sure that where necessary appropriate safeguarding referrals will be made and seek assistance from other agencies such as St Mungos to provide advice and support.

57. It is therefore likely that the Writ will be enforced on a road-by-road basis and the Injunction will then be served upon every road, and in accordance with the Court's directions once a road is cleared. Clearly persons who are removed under the Writ and return could then be evicted afresh by a restitution order, but we would have the facility of enforcing the Injunction and the Injunction will then bind any newcomer to that road or grassed area of The Downs. It is by this piecemeal approach that the occupiers' vulnerabilities (where they exist) we refer for support and the Council's statutory obligations particularly under the PSED are met.

58. I have also considered the Defendants' rights specifically Article 8 (private life and family) and Article 11 (freedom of assembly and association) of the European Convention on Human Rights which are engaged by the terms of the proposed orders. I recognise that the Defendants have established The Downs as their home, as this is where they reside in their vehicles, and some of them may have been living on these roads for months or years. I am advised Articles 8 and 11 are qualified rights and there can be an interference with those rights in the interest, for example public safety and the prevention of crime and disorder.

59. As I have explained in detail above there are considerable legal and environmental problems because of the presence of the vehicles on the Highways and leaving the vehicles in situ (even a minimum number) is not an option.

60. It is a given fact that the Defendants have not been given permission to reside on the Highway or any part of The Downs, and for reasons I have highlighted at

length the area is not a suitable location for them to so reside. In addition, as detailed above, the NET have asked occupants whether they need support with housing and have offered to refer them to St Mungos or Meanwhile sites to assist them away from residing on the roads around The Downs. If the Defendants engage with this process they can potentially be supported into suitable provision by St Mungo's and the Claimant's relevant teams or partner agencies, as well as on upcoming Meanwhile sites. In addition, any newcomers who try to reside on the roads will be informed of any support that the Claimant maybe able to provide to them.

61. The Claimant therefore respectfully submits that the interference to the Defendants human rights is justified in pursuance of achieving the legitimate aims, of preventing public health risks, criminal behaviour, environmental damage and the interference with the ability of citizens and visitors of Bristol to enjoy The Downs, together with ameliorating the impact on local residents outweighs any interference with the article 8 and 11 rights of the Vehicle Dwellers. Having considered the matter at great length I had concluded there is no way the rights of residents, users of the Downs for recreational purposes and the avoidance of the various problems I have discussed at length, can coexist with an encampment of vehicles used for residential purposes of any scale especially when that residential use conflicts with so many statutory provisions.

62. So, in the case of the Downs the decision to recover possession is made under established statutory powers and is applied to address issues such as, public health, environmental impact, public amenity, and the rights of the wider community. These are all recognised legitimate aims under Article 8. Relocating the occupied vehicles from the public highway adjacent to the open space is considered both proportionate and necessary to prevent ongoing obstruction, protect public safety, and to preserve the proper use of the land. This action forms a reasonable and essential measure to support the effective enforcement of the Injunction and to mitigate continued harm and disruption to the wider community.

A brief summary of the relief the Claimant is seeking

63. The first step is to seek directions in Claim No. M00BS958 to extend the ambit of those proceedings to cover the highways in exhibit KJ01. Or issue fresh proceedings in respect of the Highways.

64. The second step is to seek that the Possession Order which will then be enforced by way of a Writ of Possession following transfer to the High Court.

65. The third step is to extend the Injunction to cover the highways, so that when the Possession Order is enforced the Injunction will be served and will bind the persons removed therefrom and any newcomers.

66. The Claimant therefore seeks appropriate directions from the Court to facilitate this process. Including the consolidation of Claim No. M00BS958 with this matter. We will do the same should we issue separate possession action.

67. Although this might be slightly premature, I set out below an outline of the proposed Newcomer Injunction the Claimant seeks.

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

i. Entering or being present, within the area shown in the Map attached to this injunction edged and hatched red, 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 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.

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

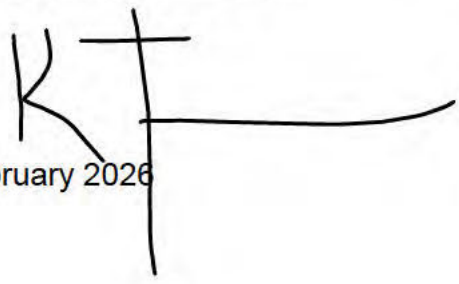
iv. Causing any nuisance, harassment, alarm or distress to any person lawfully on Durdham Down, Clifton Down, Ladies Mile , Parrys Lane, Saville Road, Downleaze, Rockleaze, Circular Road, Roman Road, Clay Pit Road, Stoke Road, Wills Lane and Westbury Park by way of any or all of (1) dangerous driving 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.

68. Finally, by way of completeness the proposed possession order will be that the Claimant do recover possession of 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.

69. The Court will of course give directions for the issue and service of the Applications, and subsequent orders in accordance with the CPR and the decision of the Supreme Court in Wolverhampton City Council and others v London Gypsies and Travellers and others.

Statement of Truth

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

Signed: 

Dated: 4 February 2026

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ01

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

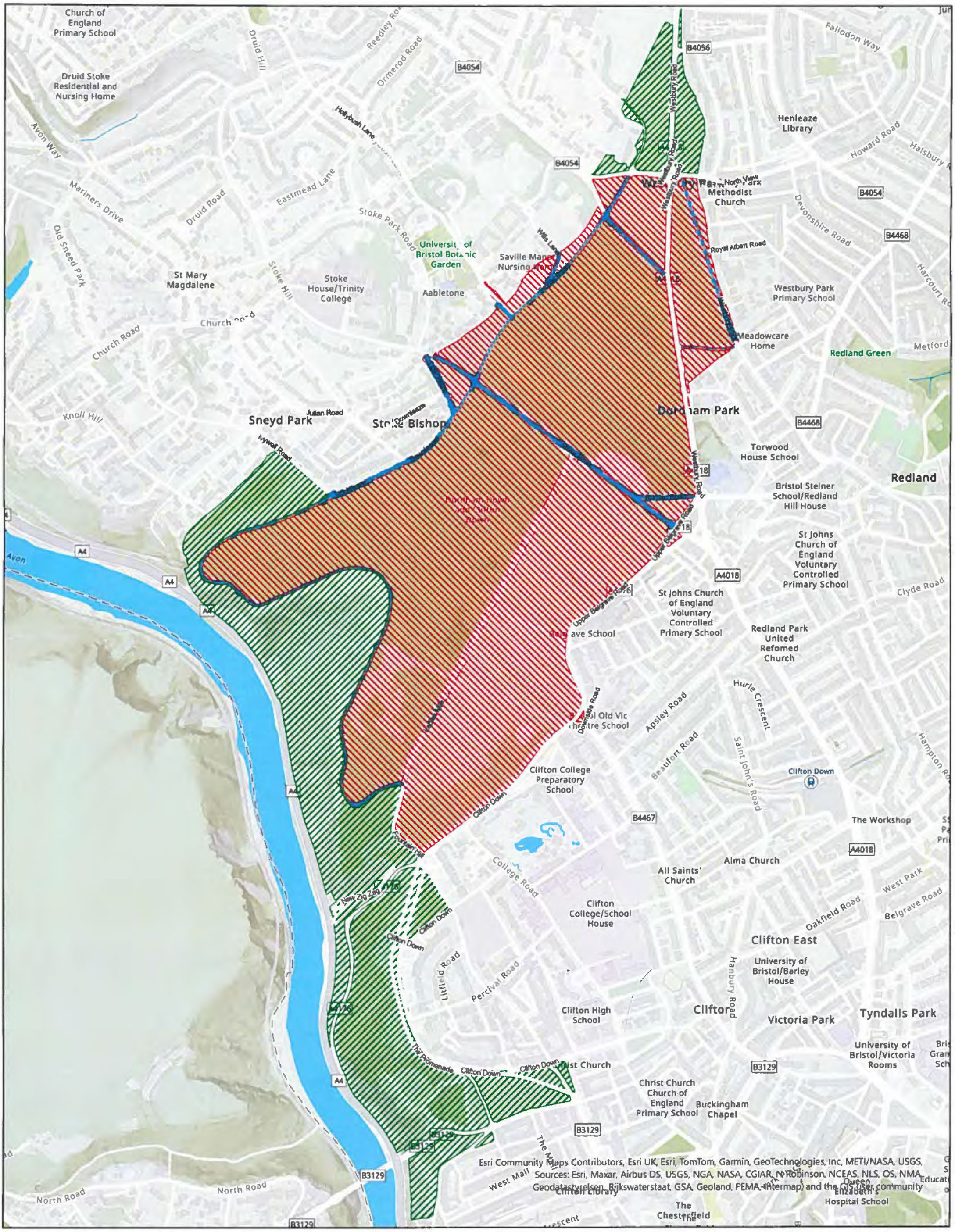
Claimant

AND

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

Defendants

Exhibit KJ01



Bristol City Council

Clifton and Durdham Downs - Injunction

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PARKS & GREEN SPACES

Scale: 1:3,496 @A4
Date: 29/07/2025

GROWTH & REGENERATION DIRECTORATE
MANAGEMENT OF PLACE SERVICE
GIS & Asset Management Team,
Bristol Parks Service
Bower Ashton Depot, Kennel Lodge Rd, Bristol
bristolparks@bristol.gov.uk
www.bristol.gov.uk/parks

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ02

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ02

Injunction Order

Between Persons Unknown, Defendant
and Bristol City Council, Claimant

In the County Court at Bristol	
Claim Number	M00BS959
Claimant (including ref.)	Bristol City Council
Defendant (including ref.)	Persons Unknown

Persons Unknown
Unknown
Unknown

THE COUNTY COURT

PENAL NOTICE

If you, any Person Unknown on Clifton Down, Durdham Down, and Ladies Mile who are residing, or intend to reside, in tents, caravans, structures, or other vehicles, do not comply with this order you may be held in contempt of court and imprisoned or fined, or your assets seized.

Before District Judge Napier sitting at County Court at Bristol, Bristol Civil Justice Centre, 2 Redcliff Street, Bristol BS1 6GR

UPON hearing the Solicitor for the Claimant, there being no appearance by any Defendant

AND UPON the Court handing down a written judgment on 25 July 2025 which is available from the County Court at Bristol at the address below

On 25 July 2025 the court considered an application for an injunction

The Court ordered that To all Persons Unknown on Clifton Down, Durdham Down, and Ladies Mile who are residing, or intend to reside, in tents, caravans, structures, or other vehicles.

You are forbidden (whether by yourselves or by instructing or encouraging any other person) **FROM**:

i. Entering or being present, within the area shown in the Map attached to this injunction edged and hatched red or green, on Clifton Down, Durdham Down and Ladies Mile 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 and green.

iii. Placing household or any other waste material within the area shown in he Map attached to this Injunction edged and hatched red or green. 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 and Ladies Mile 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.

AND IT IS FURTHER ORDERED THAT you must vacate any part of the area shown in the Map attached to the Injunction edged and hatched red or green on Clifton Down, Durdham Down and Ladies Mile within two hours of any written or oral request by an authorised officer or agent of Bristol City Council or by any constable (provided

that at the time of the request you are offered a copy of this Injunction) and you must not return to the said area without the express written permission of 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 25 July 2026 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.

You may be able to get free legal aid advice. Go online at www.gov.uk/legal-aid for further information

If you do not understand anything in this Order, you should go to a Solicitor, Legal Advice Centre or a Citizens Advice Bureau.

Anti-Social Behaviour Injunction Power of Arrest

In the County Court at Bristol	
Case Number	M00BS959
Claimant (including ref.)	Bristol City Council
Defendant (including ref.)	Persons Unknown

Persons Unknown
Unknown
Unknown

THE COUNTY COURT

District Judge Napier sitting at the County Court at Bristol, Bristol Civil Justice Centre, Number 2, Redcliff Street, Bristol, BS1 6GR.

PENAL NOTICE

If you, any Person Unknown on Clifton Down, Durdham Down, and Ladies Mile who are residing, or intend to reside, in tents, caravans, structures, or other vehicles, do not comply with this order you may be held in contempt of court and imprisoned or fined, or your assets seized.

UPON hearing the Solicitor for the Claimant, there being no appearance by any Defendant

On 25 July 2025 the court considered an application for an injunction

The Court ordered that To all Persons Unknown on Clifton Down, Durdham Down, and Ladies Mile who are residing, or intend to reside, in tents, caravans, structures, or other vehicles.

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

i. Entering or being present, within the area shown in the Map attached to this injunction edged and hatched red or green, on Clifton Down, Durdham Down and Ladies Mile 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 and green.

iii. Placing household or any other waste material within the area shown in he Map attached to this Injunction edged and hatched red or green. 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 and Ladies Mile 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.

Power of Arrest

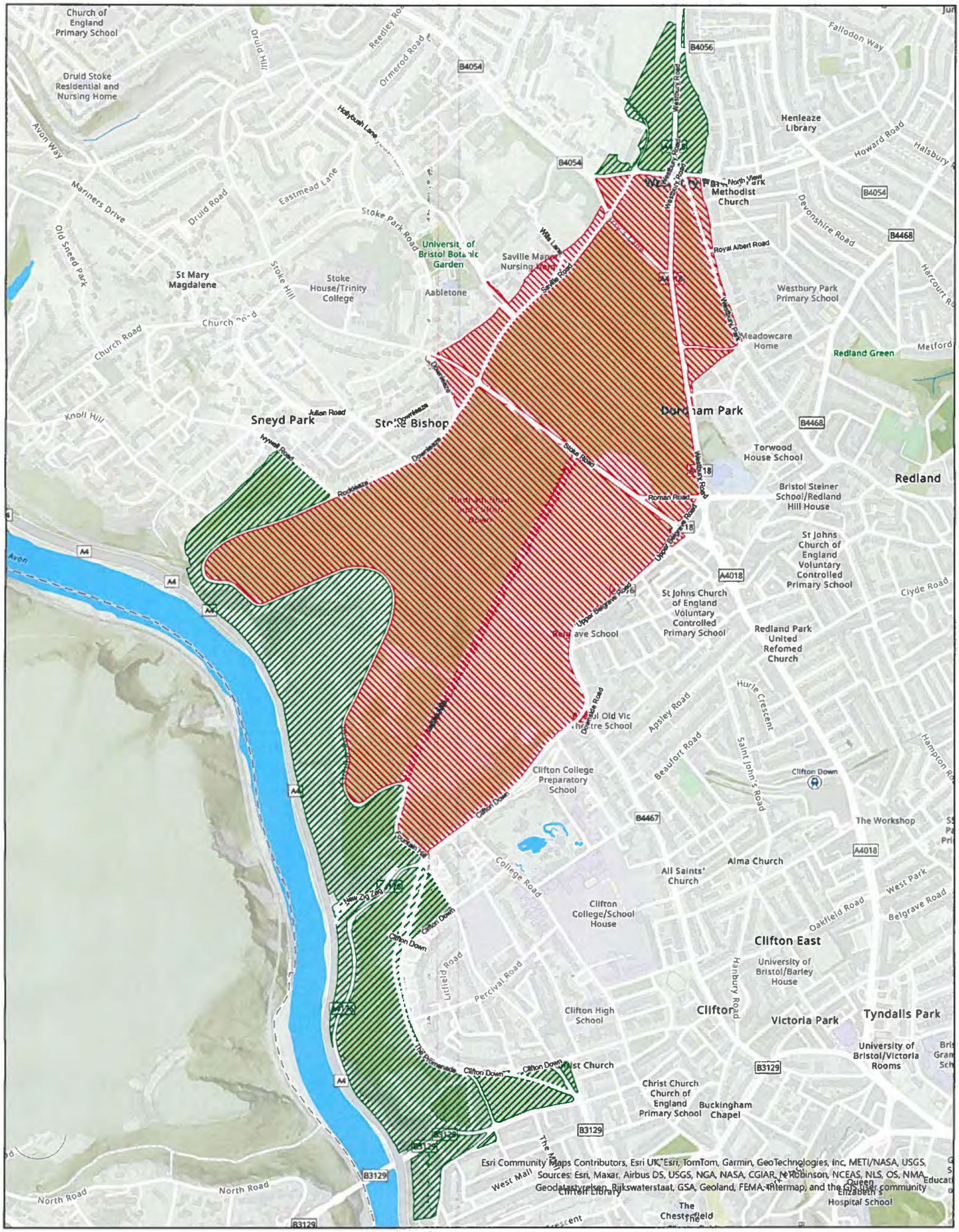
And the judge finding:
That the conditions in sections 4 of the Anti-social Behaviour Crime & Policing Act 2014, are satisfied,

And the court being satisfied that:
That the conduct consists of or includes use of violence.

A power of arrest is attached to 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 the suspecting the defendant is in breach of this injunction.

This power of arrest was ordered on 25 July 2025 and expires on 25 July 2026 at 23.59 hours or further order.

Defendant	**Note to Arresting Officer**
Persons Unknown Unknown Unknown	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 9 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.



Bristol City Council

Clifton and Durdham Downs - Injunction

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PARKS & GREEN SPACES

Scale: 1:3,496 @A4
Date: 29/07/2025

GROWTH & REGENERATION DIRECTORATE
MANAGEMENT OF PLACE SERVICE
GIS & Asset Management Team,
Bristol Parks Service
Bower Ashton Depot, Kennel Lodge Rd, Bristol.
bristolparks@bristol.gov.uk
www.bristol.gov.uk/parks

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ03

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

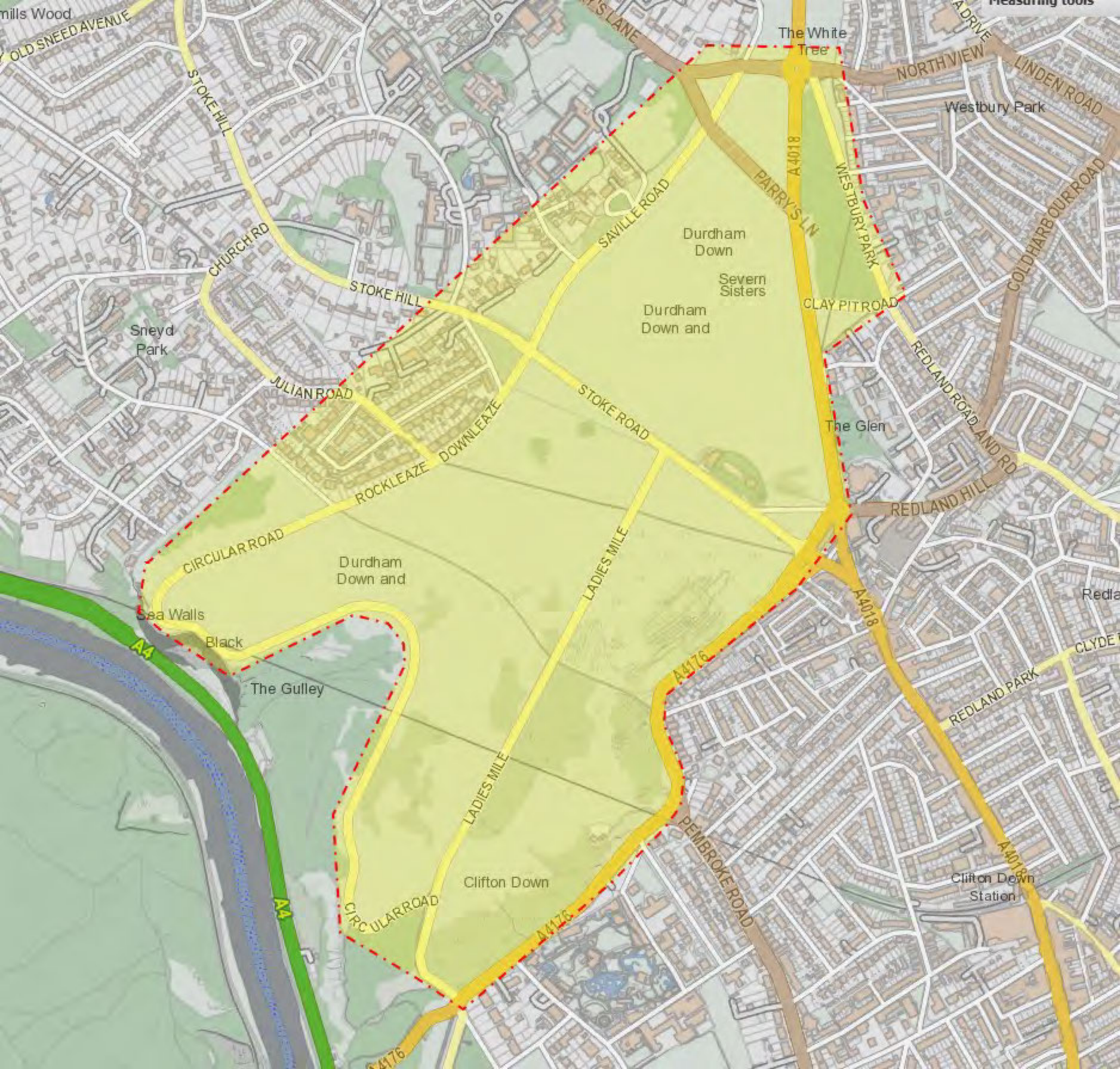
Claimant

AND

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

Defendants

Exhibit KJ03


Measuring tools
mills Wood
OLD SNEED AVENUE
STOKE HILL
CHURCH RD
STOKE HILL
Sneyd Park
JULIAN ROAD
SAVILLE ROAD
STOKE ROAD
DOWNLEAZE
ROCKLEAZE
CIRCULAR ROAD
Durdham Down and
Sea Walls
Black
The Gulley
A4
LADIES MILE
Durdham Down
Severn Sisters
Durdham Down and
The White Tree
PARRY'S LN
A4018
NORTH VIEW
LINDEN ROAD
Westbury Park
WESTBURY PARK
COLDHARBOUR ROAD
CLAY PIT ROAD
REDLAND ROAD AND RD
The Glen
REDLAND HILL
A4018
A4176
REDLAND PARK
CLYDE
PEMBROKE ROAD
Clifton Down
Clifton Down Station
A4176
CIRCULAR ROAD
LADIES MILE
A4176

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ04

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ04

From: neighbourhood.enforcement@bristol.gov.uk
To: VDE@bristol.gov.uk
Sent: Fri Jul 25 2025 11:21:05 BST
Subject: FW: Parrys Lane Open Cesspit and Vehicle work resultant in Oil Spillage

---

From: [redacted]
Sent: 25 July 2025 10:36
To: Neighbourhood Enforcement Team <neighbourhood.enforcement@bristol.gov.uk>
Subject: Fwd: Parrys Lane Open Cesspit and Vehicle work resultant in Oil Spillage

You don't often get email from [redacted] why this is important

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

As per my call yesterday (and previous correspondence over time):

1 Off Parrys Lane there is an open cesspit representing a Public Health Hazard (as per Statement to Full Council at Van Dwellers Meeting). There is a Black Council Bin Box overflowing with paper waste with human faeces evident and other sanitary products spread over metres - available to infect animals or people. There is also a 'poo bin'. There are other such places for waste in nearby copses. This should not be allowed. Picture taken today.



2 Vehicle work causing Oil Spillage - [redacted]
Again this work is not appropriate to the area and is polluting both the road and verge. Again, it should not be tolerated.





May I please have reference numbers to track your actions on these reports.

best regards,





On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ05

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ05

From: [redacted]
To: neighbourhood.enforcement@bristol.gov.uk,[redacted]
Sent: Fri Oct 31 2025 17:06:58 GMT
Subject: Re: New Litter on The Downs

(Attachments:) 20251031_113708 (1).jpg, 20251031_113107.jpg

Microsoft Exchange Server;converted from html;

You don't often get email from [redacted]. Learn why this is important

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

Apologies. Here is the photographic evidence.

On Fri, 31 Oct 2025 at 16:56, [redacted] > wrote:

NET,
I am aware that you finally cleared excrement from The Downs yesterday and I thank you for that. Unfortunately:
1 At the cleared site What3words ///sank.fits.coats the 6ft by 6ft abandoned fly tipped Solar Panel (strangely similar to nearby ones remaining in use on caravans) has been left in place untouched. Please remove.
2 At site ///occurs.pencil.debit new human excrement litter has been deposited posing a new risk to public health. Please remove.
Best regards,
[redacted]
--
[redacted]

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ06

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ06

Red highlighted areas – toileting in the bushes.

Red Stars – park bins where we regularly have van dweller associated waste (ie paint cans, bagged rubbish, bagged human waste)





On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ07

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ07

Durdham Downs

Area either side of Parrys Lane, Toilet Waste issues

Date of Visit: Tuesday 21st October 2025 1145 Hours

Visiting Officers: NEO Steve Eyers & NEO Tim Bird



Fig 1. Copse Reference map.

1. Copse 1



View from Parrys Lane(Caravans) Copse 1, Saville Road to left



Excrement, toilet Tissue and empty water bottles Copse 1.



Excrement, Water bottles/toilet tissue Copse 1.

2. Copse 2



Excrement Copse 2

3. Copse 3



Toilet waste/plastic bottles/tissue paper in black box Copse 3, bench can be seen for park users, at Parrys Lane



Toilet waste/plastic bottles/tissue paper in black box Copse 3, bench can be seen for park users, at Parrys Lane

4. Copse 4 Parrys Lane



Copse 4 Parrys Lane



Copse 4 Parrys Lane, Entry used for toilet(Public bench to right)



Copse 4 Toilet Waste, including excrement/toilet tissue and empty water plastic bottles.

Visit Summary

There were 4 copse areas of thick undergrowth found in the area of Parrys Lane, as shown in Figure 1. Marked as 1-4.

All area's marked were found to contain evidence of human waste, including Excrement (Both historic and fresh), Toilet Tissue and multiple empty plastic water bottles, believed to be used for sanitary purposes.

AlL four locations showed signs of heavy footfall with well worn footpaths leading into the copse and around to different locations, leading to toilet area's.

Copse 3 and Copse 4 both had public benches which were at entrance points to the toilet areas and within a few feet of the worst affected area's.

Foot trails across the grassed area of the Downs, led officers to the area of Occupied Caravans sited along Parrys Lane.

Due to excrement and associated products within the areas visited NET believe this to be a serious health hazard to users of the downs, including pets of visitors.

Reported submitted for your consideration

Steve Eyers

Neighbourhood Enforcement officer,

Bristol City Council.

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ08

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ08

BRISTOL CITY COUNCIL'S POLICY FOR VEHICLE DWELLING ENCAMPMENTS ON THE HIGHWAY

CREATED IN PARTNERSHIP WITH BRISTOL CITY COUNCIL AND AVON AND SOMERSET POLICE

Bristol City Council and Avon and Somerset Police both recognise the role that each has to play and will comply with the government recommendations and good practice guidance in order to effectively manage occupied vehicles and caravans

Both organisations are committed to ensuring vehicle dwelling encampments are dealt with in a professional manner, taking into account the needs of all individuals concerned and ensuring, wherever practicable, that their actions are reasonable and proportionate.

CREATED: 05/12/2017

LAST UPDATED: 04/07/2019

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Introduction:

Bristol City Council is aware there are increasing numbers of people living in vehicles parked on the highway in the City of Bristol.

The Council acknowledges that the issues surrounding people dwelling in vehicles in Bristol are complex and sensitive for the following reasons:

- There is a shortage of decent affordable housing in the city and private rent levels are high, with few rental agencies accepting people on benefits or low incomes without substantial deposits or guarantors;
- People dwelling in vehicles are not a single homogenous group. People adopt the way of life for very different reasons (e.g. some for a few years, some for a lifetime, some because they cannot afford to rent and some are very vulnerable and choose to live with a group);
- Many people dwelling in vehicles come to Bristol looking for work and/or a sense of community;
- Many people living in vehicles take part in the economic and cultural life of the City;
- Establishing occupation: some of the adapted vehicles on the city's streets are not lived in; many have road tax and are registered to local people and are simply parked on the street, until needed.

Bristol City Council has a separate protocol with the police for managing unauthorised encampments on land other than the highway https://www.bristol.gov.uk/policies-plans-strategies/managing-unauthorised-encampments-policy

Whilst it is legal to park a taxed and MOT'd vehicle on the highway any instance where Bristol City Council establishes a vehicle is being lived in will fall within this policy

Caravans and other structures that are established as not being occupied but are being stored on the highway do not fall within this policy.

Aims of the Policy

This policy is about how the city council will deal with vehicle dwelling encampments on the public highway.

The expectations and standards of behaviour that are applied to people living in vehicles should be the same standard as that expected of all of citizens. Anti-social behaviour and criminal activity is not acceptable from any section of the community. Many people living in vehicles find such behaviour as unacceptable as any other person, but they often move on and away from the problems.

Dealing with criminal behaviour is almost invariably the responsibility of the police. Other agencies may be involved, depending upon the nature of the crime.

The policy outlines how the city council will manage the growing number of residents living in this way, balancing their needs against those of the wider community.

The council is committed to promoting equality of opportunity for all and it is our commitment to ensure that we consider the needs of individuals and how they can best access support and services.

Links to the Corporate Plan

The policy for vehicle dwellers encamped on the highway and the procedures it contains links closely to:

Theme 1 in the Corporate Strategy: "Empowering and Caring "

- Minimising rough sleeping and homelessness in Bristol and enabling citizens in need of housing to access affordable, appropriate accommodation;
- Making sure that vulnerable people in the city continue to be protected and cared for.

Theme 4 "Wellbeing".

- Embedding health in all our policies, in order to reduce inequalities that exist across the city and reduce the demand for acute services through the One City Plan by improving the health of Bristol's population through partnership working and using assets effectively across the city.

Definitions of Terms:

Encampment

For the purpose of this policy, a vehicle dwelling encampment will be defined as one or more person living in one or more vehicle or structure on the highway.

Vehicle

For the purpose of this policy, vehicle will be defined as any vehicle, whether or not it is in a fit state for use on roads, and includes any structure with or without wheels, appearing to have formed part of such a vehicle, and any load carried by, and anything attached to, such a vehicle; and a caravan as defined in section 29(1) of the Caravan Sites and Control of Development Act 1960

Gypsy Roma Traveller

The term Gypsy, Roma and Traveller (GRT) is a collective term used to describe a wide variety of distinct cultural and ethnic groups. Ethnicity can be understood based on certain shared characteristics such as cultural customs, values, language and through self-identification. Defining a person as a Gypsy, Roma or Traveller is a matter of self-description and does not exclude those who are living in houses as the person's ethnic identity is not lost when members of the communities settle, but it continues and adapts to the new circumstances (NATT, 2010).

NET

Bristol City Council's Neighbourhood Enforcement Team

NEO

Bristol City Council's Neighbourhood Enforcement Officer

The Policy

When to intervene:

1. In considering any vehicle dwelling encampments a balance will be maintained between the rights of those encamped and the rights of the landowner, including the Highways Authority, those lawfully entitled to use the public highway and the local community. Each encampment will be considered on its own merits and officers will act in a neutral, objective and open way. A joint protocol will be maintained between Bristol City Council and Avon and Somerset Police to ensure effective partnership and management of encampments on the highway across the city.

2. Each vehicle dwelling encampment will be individually considered before a decision is taken on whether enforcement action will be taken. Each vehicle dwelling encampment will be assessed and categorised as either 'high impact' or 'low impact' taking into account the following factors:

Relevant factors:

- The welfare needs of the occupants
- The nature, suitability or obtrusiveness of the encampment.
- The level of any nuisance including noise and smoke.
- The number, validity and seriousness of any complaints.
- The level of damage caused by the occupiers.
- Proximity to residential properties
- Proximity to schools, children's play and other public amenities
- The size and concentration of the encampment
- Human and domestic waste management
- General crime and public order offences.

Full assessments of welfare, education and health needs of the people living in the encampments will be conducted before any action is taken. The occupiers will be signposted to sources of support and advice including St Mungo's outreach service .The definition of high and low impact follows government and police guidance on effective management of encampments.

3. Consideration will be given to obtaining injunctions to prevent vehicle dwelling encampments in locations repeatedly affected by 'high impact' vehicle dwelling encampments or which are considered particularly vulnerable sites.

Definition of high and low impact encampments:

Bristol City Council in partnership with Avon and Somerset Police will determine whether a vehicle dwelling encampment is evaluated as a high impact or low impact based on the following.

High Impact

High impact encampments are those where:

- There are activities in the encampment, such as serious breaches of the peace, disorder, criminal activity or anti-social behaviour (ASB) which would necessitate police involvement under their wider powers;

- The encampment has an unacceptable impact on the environment and the local community because of

a) its nature, suitability or obtrusiveness

b) its size and concentration

c) proximity to residential properties,

d) proximity to schools, children's playgrounds and other public amenities;

e) inappropriate disposal of human and general waste ;

f) high noise or smoke levels.

g) the vehicle(s) is/are parked in a way which endangers either those living in the vehicles and/or road users i.e. on a busy road or junction etc.

The council and/or police will take prompt action in relation to vehicle dwelling encampments that are evaluated as 'high impact'.

Low Impact

Low impact vehicle dwelling encampments are those where:

- The person/people dwelling in a vehicle/ vehicles indicate that it is their intention to stay in an area for a short period, and they are unlikely to cause disruption or damage during their stay. (A departure date should be agreed with the stipulation that staying beyond the stated date may trigger legal action); and

- The encampment does not cause significant impact to the local environment or community against the 8 relevant factors (e.g. noise, waste, ASB, etc.)

- Where the encampment is assessed to be low impact, the council may take the decision to tolerate the encampment and not take legal action, for the time being. The council will ensure that other relevant bodies are informed. Relevant bodies include Cabinet members and relevant ward members, the public, the police complainants and local education, health and/or welfare agencies.

Process to be followed in the event of a high impact vehicle dwelling encampment

The process that will be followed in the event of a high impact vehicle dwelling encampment is outlined in Appendix 3 (page 17 of this document)

Local authority enforcement powers are outlined in Appendix 1 of this document.

Links to other policies

Tackling rough sleeping is one of five key priorities in the revised Homelessness and Rough Sleeping Strategy 2019-24. Although the revised strategy does not specifically refer to vehicle dwelling on the highway, anyone living in a vehicle requiring housing advice or is homeless can access services through the Housing Options Service.

The Neighbourhood Enforcement Team follow the Council's Enforcement Policy for Regulatory Services 2019

Appendix 1: Local authority powers

Local Authority (LA)Powers	
POWER	WHEN CAN THE POWER BE APPLIED?
POWERS OF LA TO DIRECT UNAUTHORISED CAMPERS TO LEAVE	Where people are residing in vehicles (including caravans) on land Section 77 of the Criminal Justice and Public Order Act 1994 gives LAs in England and Wales power to give a direction to leave the land. The power applies only to land forming part of a highway, any other unoccupied land or occupied land on which people are residing without the consent of the occupier. It is an offence to fail to comply with such a direction. If the direction is not complied with, the LA can apply to a magistrates' court for an order requiring the removal of vehicles and any occupants from the land (Section 78). Responsibility for eviction lies with the LA. Officers or agents of the LA may use reasonable force to evict. It is usually recommended that the police attend such evictions in order to prevent a breach of the peace. Please note this power does not apply to other campers (i.e. those sleeping under canvas).
ADDRESSING OBSTRUCTIONS OF THE PUBLIC HIGHWAY	If tents and other structures are erected on the public highway, so as to constitute a 'nuisance', the relevant highway authority may serve a notice requiring their removal under the Highways Act 1980 (England and Wales only). If the recipient fails to comply, the highway authority can apply to the Court for a removal and disposal order. The key issue is the need to demonstrate that the tents, etc. that are deposited on the highway are causing a clear, actual obstruction (a 'nuisance'). 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 for which they are the highway authority, including any roadside waste which forms part of it. Any council may assert and protect the rights of the public to the use and enjoyment of any highway in their area for which they are not the highway authority, including any roadside waste which forms part of it. It is the duty of a council who are a

	highway authority to prevent, as far as possible, the stopping up or obstruction of the highways for which they are the highway authority, and any highway for which they are not the highway authority, if, in their opinion, the stopping up or obstruction of that highway would be prejudicial to the interests of their area.
THE ANTI-SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014 PUBLIC SPACE PROTECTION ORDER UNDER SECTION 59 COMMUNITY PROTECTION NOTICE UNDER SECTION 43	1. A Public Space Protection Order under Section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 s can be made if the local authority is satisfied on reasonable grounds that two conditions are met. **I. The first condition is that:** a. Activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality; or b. It is likely that activities will be carried on in a public place within that area and that they will have such an effect **II. The second condition is that the effect, or likely effect, of the activities:** a. Is, or is likely to be, of a persistent or continuing nature b. Is, or is likely to be, such as to make the activities unreasonable, and c. Justifies the restrictions imposed by the notice The PSPO can restrict access to public spaces where that space is being used to commit anti-social behaviour. So an order restricting the overnight parking of a caravan or vehicle converted for living purposes are restrictions which could be imposed assuming there is clear evidence linking those caravans/vehicles to anti-social behaviour. Breach of a PSPO is a summary only offence punishable on conviction to a fine not exceeding £1,000. 2. A Community Protection Notice (CPN) under Section 43 of the Anti-social Behaviour, Crime and Policing Act 2014 can be issued to a person over the age of 16 if an authority is satisfied on reasonable grounds that: i. The conduct of the individual is having a detrimental effect, of a persistent nature or continuing nature, on

ANTI SOCIAL BEHAVIOUR INJUNCTIONS	the quality of life of those in the locality; and ii. The conduct is unreasonable. The individual can be required take or refrain from certain actions which are linked to the anti-social behaviour. Failure to comply with a CPN is a summary only offence punishable on conviction to a fine not exceeding £2,500 A court can make an anti- social behaviour injunction where there has been conduct that has caused, or is likely to cause, harassment, alarm or distress to any person and it is just and convenient to grant the injunction to prevent anti-social behaviour. The injunction may exclude a perpetrator over the age of 18 from premises or an area specified within the terms of the injunction
POWER TO SEIZE A VEHICLE	From 6th April 2015 where a vehicle is suspected of being involved in the commission of an offence relating to the illegal deposit of waste or other waste offences (e.g. breach of duty of care, carrying controlled waste while unauthorised to do; operating an illegal waste site), a Local Authority or the Environment Agency or Natural Resources Wales may instantly seize a vehicle and its contents in accordance with the provisions of the Control of Pollution (Amendment) Act 1989 / the Environmental Protection Act 1990 and the Control of Waste (Dealing with Seized Property) (England and Wales) Regulation 2015. Move to LA powers The power can be used where a vehicle is suspected of having been involved in the commission of an offence but there is insufficient information concerning who committed the offence. see Central Government Report on Powers

Appendix 2: Process to be followed in managing vehicle dwelling encampments

Vehicle Encampment on Highways Land

Standard initial Steps- Two weeks

1. **Report made to council or proactive patrol by Bristol City Council's Neighbourhood Enforcement Team (NET)**
2. **NET** to refer encampments via Bristolstreetconcern@mungos.org/ 0117 4070330 8am-8pm Mon- Fri or www.streetlink.org.uk
3. **NET** to arrange for welfare assessments to be carried out
4. NET to assess High or Low Impact.
5. **Outreach** (St. Mungo's) to attempt initial engagement
6. **NET** to issue/attach warning letter under s.77 Criminal Justice & Policing Order Act'94
7. **Administrator** to log for all the above on the encampments log spreadsheet.

Monitor Phase – Three Weeks

1. **Administrator** to update Encampments Log with St. Mungo's progress on engagement.
2. **NET** to monitor site for ASB, based on staff visits and public reports.
3. **NET** to monitor site for abandoned vehicles, sex and drugs litter and human and general waste.
4. **Administrator** to update Encampments Log.

Scenario 1 – One week

Caravan/van appears abandoned.

Caravan/van appears abandoned.

Clear- up
Contractor to remove van/caravan from highway. Vehicles stored for 7 days. Caravans disposed of.

Scenario 2 – Two weeks

High impact (e.g. Levels of ASB, public Nuisance, drug activity, proximity to schools, human waste, size of encampment)

NET verifies ASB reports, assess vulnerability, and consider any alternative police powers

Eviction/Clear-up
Instruction to legal team by NET to obtain court order for removal of encampment, NET to seek police support to remove remaining vehicles by contractor

Scenario 3 – Up to three months and beyond

Low Impact (no indication of ASB, public nuisance, not in proximity of facilities, well managed waste etc.)

Extended Monitoring by NET and referrals to St Mungo's

Monthly hotspot meeting to consider need for intervention based on site behaviour and engagement

Eviction/Clear-up
If an encampment becomes high impact instruction to legal team by NET to obtain court order for removal of encampment. , NET to seek police support to remove remaining vehicles by contractor

Continue Monitoring Reduce frequency, If low impact.

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ09

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ09

Briefing Template

Meeting: Homes and Housing Delivery PCCB

DATE: 30 October 2024

TITLE: Downs VD Update

Officer presenting the report: Kurt James

Job title:

Executive Director lead: John Smith: Executive Director for Growth & Regeneration

Purpose of Briefing: To seek approval for the officer recommendation that the vehicle dwelling encampment on the Downs be designated as high impact, and if approved that an implementation plan is developed outlining how the decision will be enforced.

Background:

- Bristol City Council recognises that the increasing population of vehicle dwellers on the Downs presents significant social, health, and environmental challenges. In response, the Council has initiated a comprehensive consultation, open until 23 October, to develop a new policy that seeks to balance support for vehicle dwellers with the interests of the broader community. This process aims to clarify the management of encampments and articulate specific circumstances under which enforcement may be required. The Council's stated approach prioritises meaningful support ahead of enforcement, with ongoing legal challenges managed in accordance with due process.
- The existing policy and enforcement measures continue to apply in instances where vehicle dwellers have a negative impact on the community.
- Simultaneously, the community organisation Protect the Downs has threatened to legally challenge the council, citing deficiencies in its management of high-impact encampments and its environmental responsibilities. A key feature of their challenge has been how vehicle dwellers dispose of human waste and the council ignoring evidence of this being a problem.
- The current injunction obtained by the council relating to vehicles and van dwellers on the Downs is under review to determine its proportionality and the possibility of extension or expansion to additional areas to prevent further encampment with a hearing held 31 October 2025.
- These matters remain politically sensitive and will require further deliberation at the senior officer level to determine an appropriate course of action.

Key points to discuss:

1. Complaints about Toilet Facilities: The council received a recent complaint dated 19 October 2025 threatening to apply for a litter abatement order. The complainant identified the locations of makeshift toilet facilities used by vehicle dwellers on the Downs, pinpointed using What Three Words, and threatening to take legal action if these locations were not cleansed.
2. NET Site Visit: On 21 October 2025, the Neighbourhood Enforcement Team visited the location and using What Three Words identified the location, and upon further exploration found more locations around the Downs being used as organised toilet facilities, all filled with human waste.
3. Location of Facilities: These facilities are typically hidden in small, wooded areas near vehicle dwelling encampments.
4. Ongoing Complaints: Over the years, the council has received multiple complaints about the lack of toilet facilities for vehicle dwellers on the Downs, with requests for enforcement action to be taken.
5. Evidence Challenges: NET has repeatedly asked for evidence from complainants directly linking human waste to vehicle dwellers, but such evidence has not been provided.
6. Attribution Difficulties: While deposits of human waste are found during site visits, the Downs is a popular location for visitors and events, making it difficult to attribute the waste solely to vehicle dwellers.
7. Signs of Ongoing Use: The presence of water bottles, tissues and pathways from encampments found at these sites suggests regular use, supporting local intelligence that these areas are being used as toilets.
8. Parks Department Policy: The Parks Department has been aware of wooded areas being used as toilets by vehicle dwellers but has a policy to not engage with the affected areas until encampments are vacated, which typically only occurs following possession orders or injunctions. They have identified and mapped a number of wooded areas where vehicle dweller linked human waste deposits can be found. They further state that these wooded areas are now no go areas for people who use the Downs.
9. Waste Disposal in Litter Bins: Parks also state that vehicle dwellers are putting bagged human waste in litter bins, and these bins are mapped.
10. High Impact Designation: This is the first time NET team has found or been provided with significant and widespread evidence of human waste on the Downs and as above whilst there are some challenges with direct linkage with vehicle dwellers, given the scale of the evidence including that provided by Parks it seems highly likely that a significant proportion of these deposits are linked to the significant vehicle dweller population on the Downs.
11. Under the Existing Bristol City Council's Policy for Vehicle Dwelling Encampments on the Highway, the encampments around the Downs would now be designated as High Impact

in relation to how waste (human and general) is disposed of meaning we would start the process of evicting all vehicles from the Downs.

12. Bristol Waste Company has been asked to remove the waste in some, but not all of the locations identified in this paper, but removing the waste will not stop these locations from being used as toilets by vehicle dwellers. Fly tip and litter that is not in the immediate vicinity of lived in vehicles is regularly removed, and bins are frequently emptied.

Risks or sensitivities identified:

1. **Policy and Evidence Risks**

- The human waste issues on the Downs have been known to Parks for a number of years, so NET finding them now does not constitute a new or changed state. However, the consolidation of this new evidence means that the council is compelled to act in line with policy or risk criticism for inaction.
- There will be a reputational risk for the council associated with the question: 'why now and why have we not found evidence of human waste before now?'
- Protect the Downs have said they will push the council to act against the vehicle dwelling encampments around the Downs. BCC acting now will look like they were forced to act.

2. **Enforcement and Operational Risks**

- Regardless of which enforcement tool is used on the Downs, if action were to start now, it will take months for the enforcement process to be concluded. This will overcome the risk of vehicles being moved on in winter, although encampments have been moved at this time of year before.
- Starting enforcement action on the Downs will lead to the displacement of at least 100 lived-in vehicles from the area, with some vehicles likely to be abandoned. Although this will be the largest VDE the council has acted against to date, previous encampments at Greenbank View (60), Dovercourt (60), and New Stadium Road (38) were moved without disruption.

3. **Risks to Vehicle Dwellers**

- There will be displacement and the loss of current shelter for vehicle dwellers if enforcement action is taken, potentially resulting in homelessness or abandonment of vehicles.
- Vehicle dwellers will face increased vulnerability during winter or adverse weather if evictions proceed before additional support or alternative sites are available.
- There could be stigmatisation and heightened community tensions as a result of enforcement actions and public discourse.
- There will be uncertainty about the future amongst vehicle dwellers due to pending policy changes and the current lack of additional resources (e.g., staff, sites, storage for vehicles).

- Acting now may be viewed negatively by the vehicle dwelling community.

4. Risks to Parks Users

- There are ongoing concerns about human waste being left in wooded areas and open spaces, leading to unsanitary conditions. If there is open faeces and/or contaminated toilet tissue/materials in open public areas this would increase Public Health risks from potential infectious diseases to the public, especially to young children if they were to touch or handle the waste. Changing the status of the vehicle dwelling encampment and taking enforcement action would likely reduce any risks to public health from infectious diseases.
- To mitigate the public health impact Environmental and Public Health recommend the following actions:
    - Handing out leaflets on safe disposal of human waste to vehicle dwellers, give out strong suitable disposable bags so they can double bag, arrange a special human waste bins as temp measure, put signage up around the areas.
    - Liaise with police as it could be considered a public decency offence if people are caught doing it and put signage up around known hotspot.
    - Consider introducing a Public Space Protection Order, to prevent urination and defecation some councils have done this and then offenders could be fined.
    - Provision of portable toilets as a temporary measure, obviously maybe costly in terms of hiring and maintenance, similar to what happens at events. (The council will need to make this provision available to all VDEs on the Highway or on other land outside of Meanwhile Sites).
    - The toilet opening times on the downs are 0800 to 1700 and BCC could consider opening them 24hrs but again this may present other issues.
- Reports highlight the presence of litter, and fly tipping in areas frequented by both vehicle dwellers and other park users. This increases the risk of injury and exposure to hazardous substances.

5. Legal and Policy Change Risks

- Legal risks arising from ongoing and potential future legal actions, including injunctions and possession orders.
- The vehicle dwelling consultation has now ended, and a new policy will be tabled at the Homes and Housing Delivery Committee for decision on 19 December 2025 and if agreed will lead to the significant reduction of vehicle dwelling in Bristol. The council is preparing for the approval of this new policy, which means recruiting new staff to support policy delivery, increasing the number of meanwhile sites, and securing storage for abandoned vehicles. At this time, none of this additional resource is in place.
- BCC has been asked to attend court to justify the continuance or extension of the existing court-granted injunction on the Downs. It is likely that the encampment will be designated

high impact under the new policy if this is agreed, which will require a request to the court for the existing possession and injunction orders to be extended.

Officer recommendation:

- To approve the officer recommendation that the vehicle dwelling encampment on the Downs be designated as high impact, and if approved that an implementation plan is developed outlining how the decision will be enforced.

Consultation Details

Financial implications:

The briefing aims to seek approval from the committee for the officer recommendation that the vehicle dwelling encampment on the Downs be designated as high impact, and if approved that an implementation plan is developed outlining how the decision will be enforced.

While not explicitly stated, there are potential financial considerations that need to be acknowledged and managed, both at present, and should an implementation plan is approved. More specifically:

- Enforcement Costs: legal fees for injunctions and possession orders, operational costs for eviction and site clearance, and staff time and resources for enforcement planning and execution.
- Waste Removal and Site Maintenance: costs for Bristol Waste Company or other contractors to remove human waste and clean affected areas.
- Support Services: Potential costs for providing alternative accommodation or support to displaced vehicle dwellers.
- Legal and policy costs: Costs associated with potential defending or pursuing legal action and budget required for implementing the new vehicle dwelling policy (e.g., meanwhile sites, vehicle storage).

Finance Business Partner name: Vivi Sargioti – Finance Business Partner Growth & Regeneration
Date of comment: 28 October 2025

Equalities impacts:

Are there any equality impacts which need to be considered?	Yes or No (If yes, provide detail)
Have you engaged with the Equalities and Inclusion team?	Yes or No

Environmental impacts:

Are there any environmental impacts? Yes or No (If yes, provide detail)
Have you engaged with the Environmental performance team? Yes or No

HR implications:

Are there any HR implication? Yes or No (If yes, provide detail)
Have you engaged with your HR Business Partner? Yes or No

IT implications:

Are there any IT implications? No. I can see no implications on IT arising from this briefing. Alex Simpson, Lead Enterprise Architect

Have you engaged with an IT team Leader? Yes

Legal implications:

Are there any Legal implications? Yes or No (If yes, provide detail)
Have you engaged with Legal Services? Yes or No

Procurement implications:

Are there any procurement implications? Yes or No (If yes, provide detail)
Have you engaged with a Procurement Business Partner? Yes or No

Reputational risks:

Are there any reputational implications either positive or negative? Yes or No (If yes, provide detail)
Have you engaged with PR team? Yes or No

Appendix 1 – NET 21 October 2025 Report

Durdham Downs
Area either side of Parrys Lane, Toilet Waste issues
Date of Visit: Tuesday 21st October 2025 1145 Hours
Visiting Officers: NEO Steve Eyers & NEO Tim Bird



Fig 1. Copse Reference map.

1. Copse 1


View from Parrys Lane (Caravans) Copse 1, Saville Road to left



Excrement, toilet tissue and empty water bottles Copse 1.



Excrement, Water bottles/toilet tissue Copse 1.

2. Copse 2



Excrement Copse 2

3. Copse 3



Toilet waste/plastic bottles/tissue paper in black box Copse 3, bench can be seen for park users, at Parrys Lane



Toilet waste/plastic bottles/tissue paper in black box Copse 3, bench can be seen for park users, at Parrys Lane

4. Copse 4 Parrys Lane



Copse 4 Parrys Lane



Copse 4 Parrys Lane, Entry used for toilet(Public bench to right)



Copse 4 Toilet Waste, including excrement/toilet tissue and empty water plastic bottles.

Visit Summary

There were 4 copse areas of thick undergrowth found in the area of Parrys Lane, as shown in Figure

1. Marked as 1-4.

All area's marked were found to contain evidence of human waste, including excrement (both historic and fresh), Toilet tissue and multiple empty plastic water bottles, believed to be used for sanitary purposes.

All four locations showed signs of heavy footfall with well-worn footpaths leading into the copse and around to different locations, leading to toilet areas.

Copse 3 and Copse 4 both had public benches which were at entrance points to the toilet areas and within a few feet of the worst affected areas.

Foot trails across the grassed area of the Downs, led officers to the area of Occupied caravans sited along Parrys Lane.

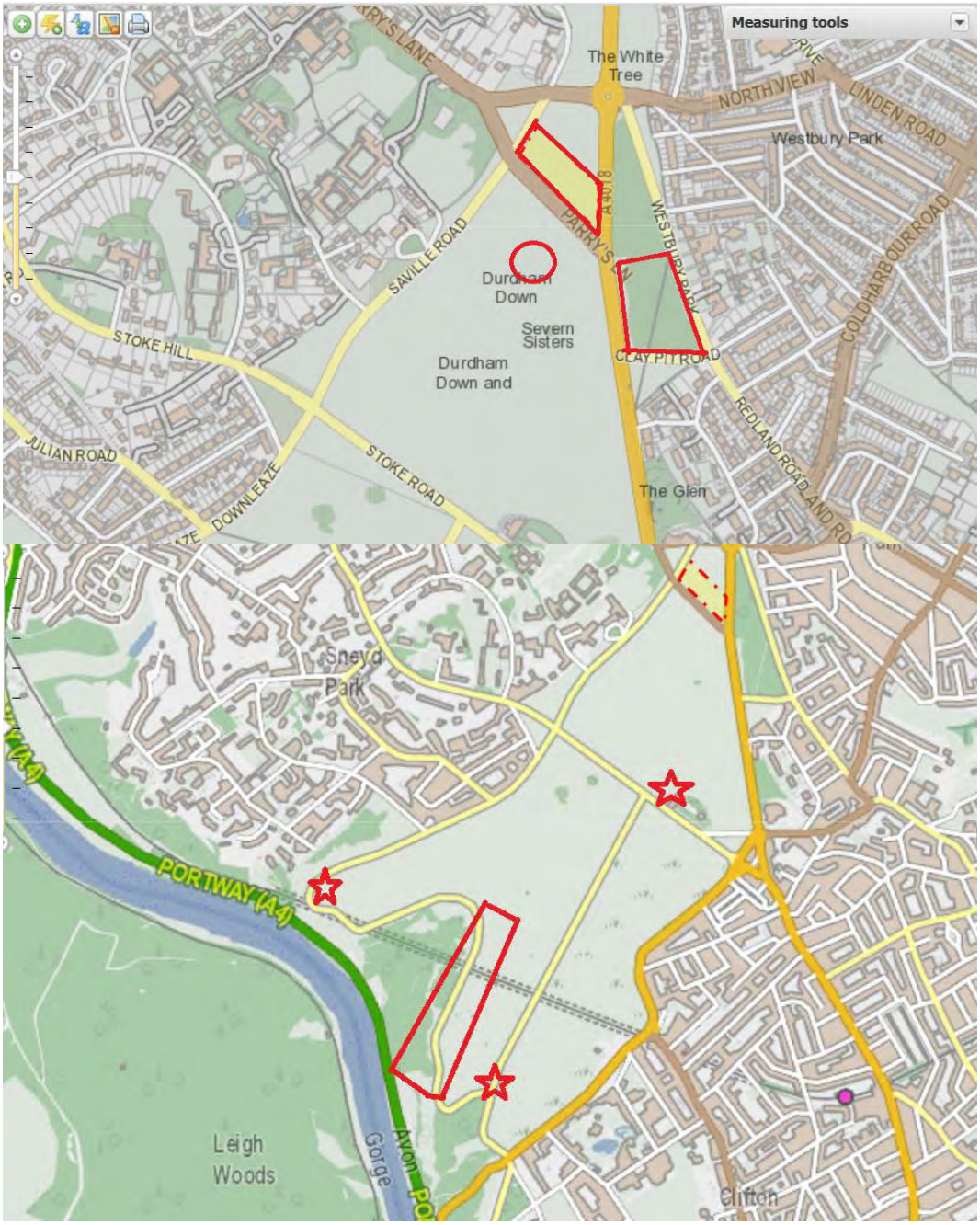
Due to excrement and associated products within the areas visited NET believe this to be a serious health hazard to users of the Downs, including pets of visitors.

Reported submitted for your consideration

Steve Eyers
Neighbourhood Enforcement officer,
Bristol City Council.

Appendix 2 – BCC Parks Map of Human Waste Locations

Red highlighted areas – toileting in the bushes.
Red Stars – park bins where we regularly have van dweller associated waste (ie paint cans, bagged rubbish, bagged human waste)



On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ10

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ10

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(1)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	CLAY PITT ROAD.
Occupant Name(If provided)	NO ANSWER UNOCCUPIED	Contact Mob/Email	/
Nationality	/	Interpreter required (state Language required)	/
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female /	Health Problems Declared (Include metal health conditions if disclosed)	/
GP Registered	Yes / No /	Surgery Location/GP	/
Immediate medical assistance required	Yes / No (State reason if Yes) /	Outpatient (state clinic location)	/
Housing referral required	Yes/No /	Meanwhile site referral (contact details required)	Yes/No /
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	UNOCCUPIED.		

Visiting Officer Name: SARAH MCCLUSKEY Date/Time: 2/12/25 0956

(2)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	Clay Pit Road
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer			

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/2025 10:07

3

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/2025	Location	Clay Pit Road
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Padlocked, occupier not present on visit		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/2025 10:00

(4)

NET Vehicle Dweller Welfare Check Sheet/Referral form

Date of visit	2/12/2025	Location	Westbury Park
Occupant Name(If provided)	—	Contact Mob/Email	—
Nationality	—	Interpreter required (state Language required)	—
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	—
GP Registered	Yes / No	Surgery Location/GP	—
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	—
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NO occupied/NO Response.		

Visiting Officer Name: Dipendra Gurung Date/Time: 2/12/25 10.31

6

NET Vehicle Dweller Welfare Check Sheet/Referral form

Date of Visit	02/12/2025	Location	WESTBURY PARK
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED NO ANSWER	[redacted]	

Visiting Officer Name: SARAH MCCLUSKEY

Date/Time: 02/12/25 10:22.

(7)

NET Vehicle Dweller Welfare Check Sheet/Referral form

Date of Visit	02/12/2025	Location	WESTBURY PARK, BRISTOL
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED NO ANSWER		

Visiting Officer Name: SARAH MCCLUSKEY

Date/Time: 02/12/2025 10:15

8

NET Vehicle Dweller Welfare Check Sheet/Referral form

Date of Visit	02/12/2025	Location	WESTBURY PARK BRISTOL
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED. NO ANSWER		

Visiting Officer Name: SARAH MALOSKEY

Date/Time: 02/12/2025 10:11

(9)

NET Vehicle Dweller Welfare Check Sheet/Referral form

Date of Visit	02/12/2025	Location	WESTBURY PARK, BRISTOL
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED NO ANSWER		

Visiting Officer Name: SARAH MALINSKEY

Date/Time: 02/12/2025 10:04

(10)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	Westbury Park
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	—
Vehicle Type	~~Caravan~~/~~Car~~/Van/~~Lorry~~/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	~~Yes~~ / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	—
GP Registered	Yes / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	~~Yes~~ / No (State reason if Yes)	Outpatient (state clinic location)	No
Housing referral required	~~Yes~~/No	Meanwhile site referral (contact details required)	Yes/~~No~~
Referred for further Welfare support	(State to whom referred/Referral date) No.		
Current supporting agencies	(Enter details of current support being received) No		
Other notes from Visiting officer	[redacted]		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/2025 10:26

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	Westbury Park
Occupant Name(If provided)		Contact Mob/Email	[redacted]
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	occupier not Present on visit		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/2025 10:21

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	Roman Road
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	occupier not present on visit		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/25 12:07

13

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025.	Location	ROMAN RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	SPOKE WITH OCCUPANT - DID NOT WANT TO ENGAGE & REFUSED PAPERWORK.		

Visiting Officer Name: SARAH MCCLUSKEY Date/Time: 02/12/25 11.55.

14

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	ROMAN RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED. NO ANSWER		

Visiting Officer Name: SARAH MACLUSKEY Date/Time: 02/12/25 12:00

(15)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/25	Location	Parry's Lane
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NO ~~as~~ occupant / NO response.		

Visiting Officer Name: Dipendra Gurung Date/Time: 2/12/25, 11:00.

17

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/2025	Location	Parry's Lane
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	No response, No occupant.		

Visiting Officer Name: Deputy Gurung Date/Time: 2/12/25 11.22

(18)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/25	Location	Parry's Lane.
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	No occupant / No response. Deemed abandoned		

Visiting Officer Name: Dipendra Gung Date/Time: 2/12/25, 11:02

19

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/2025	Location	Parry's Lane
Occupant Name(If provided)	—	Contact Mob/Email	—
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Spoke to occupant. informed us that he is not from here.		

Visiting Officer Name: Date/Time:

20

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/25	Location	Parry's Lane
Occupant Name(If provided)	—	Contact Mob/Email	—
Nationality	—	Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	No occupant/No Response.		

Visiting Officer Name: Deepinder Gurung Date/Time: 2/12/25 10:44

21

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/2025	Location	Parry's Lane
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other White	Vehicle Registration (Please provide full description if no registration)	—
Children	Yes / No — Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	the occupant is co-operating and will contact us		

Visiting Officer Name: Date/Time:

22

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	PARRYS LANE
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	~~Caravan~~/Car/Van/Lorry/ Other WHITE	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NO ANSWER NOT OCCUPIED		

Visiting Officer Name: S MCCLUSKEY

Date/Time: 2/12/25 1130

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025.	Location	PARRY LANE
Occupant Name(If provided)	/	Contact Mob/Email	/
Nationality		Interpreter required (state Language required)	/
Vehicle Type	~~Caravan~~/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	NO REG.
Children	Yes / ~~No~~ Ages: ~~Male~~/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	OCCUPANT HOSTILE. NO DETAILS TAKEN PAPERWORK REFUSED – THROWN AWAY		

Visiting Officer Name: SARAH MACLUSKEY Date/Time: 02/12/25 11:20

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	PARRYS LANE
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	~~Caravan~~/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	~~Yes~~ / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED NO ANSWER		

Visiting Officer Name: SARAH MCCLUSKEY Date/Time: 02/12/25 11:16

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	PARRYS LANE
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	~~Caravan~~/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	NO REG.
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED VEHICLE LOCKED		

Visiting Officer Name: SARAH MCCUSKEY Date/Time: 02/12/2025 11:09

26

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	PARRYS LANE
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	~~Caravan~~/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NO ANSWER. NOT OCCUPPIED		

Visiting Officer Name: SARAH MCLUSKEY Date/Time: 02/12/25 11:00.

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	PARRY ROAD - BRISBANE
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	✓
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: [redacted] Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	Yes / No [redacted]	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	NO -
Housing referral required	Yes/No [redacted]	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) NONE		
Other notes from Visiting officer			

Visiting Officer Name: SARAH MAWSEY Date/Time: 02/12/25

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	PARRYS LANE.
Occupant Name(If provided)	DID NOT WISH TO DISCUSS/ TALK	Contact Mob/Email	/
Nationality	/	Interpreter required (state Language required)	/
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: NOT KNOWN Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	NOT KNOWN.
GP Registered	Yes / No /	Surgery Location/GP	/
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No /	Meanwhile site referral (contact details required)	Yes/No /
Referred for further Welfare support	(State to whom referred/Referral date) /		
Current supporting agencies	(Enter details of current support being received) /		
Other notes from Visiting officer	DIDNT WANT TO ENGAGE THREW PAPERWORK BACK.		

Visiting Officer Name: SARAH MACLUSKA Date/Time: 02/12/2025 10:39.

29

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	Perrys Lane
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	occupier not present on visit		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/25 11:17

36

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	Porrys Lane
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	smoked window open, door open		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/25 11:03

Recovery Required

31

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	Potts Lane
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	occupier not present on visit		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/25 10:58

32

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	Parrys Lane
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	-
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Occupier not present on visit		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/25 10:41

23

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	Parrys Lane
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	No
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	None
GP Registered	Yes / No [redacted]	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	No
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date) None		
Current supporting agencies	(Enter details of current support being received) None		
Other notes from Visiting officer			

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/25 10:53

34

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	Parrys Lane
Occupant Name(If provided)		Contact Mob/Email	[redacted]
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Occupier not present during visit		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/25 10:44

35

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/2025	Location	Saville Road
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	occupier not present on visit - Padlocked		

Visiting Officer Name: Thomas Lawrence Date/Time: 02/12/25 11:31

36

NET Vehicle Dweller Welfare Check Sheet/Referral form

Date of Visit	2/12/25	Location	Saville Road.
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	No occupant / No response - A passers by informed us it is abandoned.		

Visiting Officer Name: Dependra Gurung Date/Time: 2/12/25, 11:33

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	SAVILLE RD.
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	NO REG.
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	VEHICLE UNSECURE / OPEN		

Visiting Officer Name: SARAH MCCLUSKY Date/Time: 02/12/25 11 41

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	Saville Rd / Down
Occupant Name(If provided)	N/K.	Contact Mob/Email	N/K.
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~ [redacted]	Vehicle Registration (Please provide full description if no registration)	N/K.
Children	Yes / No [redacted] Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	N/K
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer	Unoccupied caravan / appears locked.		

Visiting Officer Name: Tim Bird

Date/Time: 11.40.

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	SAVILLE RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	NO REG
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	VEHICLE LOCKED		

Visiting Officer Name: SARAH MCCLUSKEY Date/Time: 02/12/25 11 35

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/25 1143	Location	SAVILLE ROAD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	UNOCCUPIED [redacted]		

Visiting Officer Name: Date/Time:

44

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25 1124	Location	LADIES MILE
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	UNATTENDED		

Visiting Officer Name: Date/Time:

(45)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2/12/25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED.		

Visiting Officer Name: NAOMI JONES

Date/Time:

(17)

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD.
Occupant Name(If provided)	N/K	Contact Mob/Email	N/K.
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) * resident offered site visit Notice * refused details		
Other notes from Visiting officer	UNOCCUPIED - UNABLE TO DISCUSS WITH ANYONE.		

Visiting Officer Name: Tim Bird. Date/Time: 2.12.25

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD.
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Caravan/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 2.12.25

(2) (50)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD
Occupant Name(If provided)	N/K.	Contact Mob/Email	N/K.
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Unoccupied vehicle.		

Visiting Officer Name: TOM BIRD

Date/Time: 10.09 hrs

(3.) (51)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD
Occupant Name(If provided)	DECLINED. NAME.	Contact Mob/Email	N/K.
Nationality		Interpreter required (state Language required)	
Vehicle Type	~~Caravan~~/~~Car~~/Van/~~Lorry~~/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/~~Female~~	Health Problems Declared (Include metal health conditions if disclosed)	N/K.
GP Registered	Yes / No N/K.	Surgery Location/GP	N/K.
Immediate medical assistance required	Yes / No (State reason if Yes) N/K	Outpatient (state clinic location)	
Housing referral required	Yes/No N/K.	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Details of female occupant declined		

Visiting Officer Name: Tim Bird.

Date/Time: 10.15.

52

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD.
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: [redacted]

Date/Time: 2/12/25 1015

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	Yes / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No ON WAITING LIST.
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) REFERRED MEANWHILE - MAY - JUNE.		
Other notes from Visiting officer			

Visiting Officer Name: N. JONES

Date/Time: 1020.

(4)

55

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD
Occupant Name(If provided)	N/K.	Contact Mob/Email	N/K.
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other CARAVAN. [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: N/K Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer	Unoccupied caravan.		

Visiting Officer Name: Date/Time:

56

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other WHITE	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE.		

Visiting Officer Name: N. JONES

Date/Time: 10.22.

(5.)

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD,
Occupant Name(If provided)	N/K.	Contact Mob/Email	N/K
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~ [redacted]	Vehicle Registration (Please provide full description if no registration)	N/K. WHITE.
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date) N/K		
Current supporting agencies	(Enter details of current support being received) N/K.		
Other notes from Visiting officer	Unoccupied Caravan		

Visiting Officer Name: Tim Bird

Date/Time: 10.27

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	02/12/25	Location	CIRCULAR ROAD
Occupant Name(If provided)	NOT GIVEN	Contact Mob/Email	NOT GIVEN
Nationality	[redacted]	Interpreter required (state Language required)	NO
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	NO
GP Registered	Yes / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	N/A
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date) N/A		
Current supporting agencies	(Enter details of current support being received) N/A		
Other notes from Visiting officer			

Visiting Officer Name: N LEIGH

Date/Time: 1025- 02/12/25

52

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD.
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan Car/Van/Lorry/ Other WHITE	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 10.28

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	Girala Rd
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Oth~~er [redacted]	Vehicle Registration (Please provide full description if no registration)	N/k.
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	N/k.
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer	Unoccupied Caravan		

Visiting Officer Name: Tim Bird.

Date/Time: 11.10 hrs

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other WHITE	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 10.32

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	021225	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/~~ Other	Vehicle Registration (Please provide full description if no registration)	N/A
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	~~Surgery Location/GP~~	
Immediate medical assistance required	Yes / No (State reason if Yes)	~~Outpatient~~ (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	[redacted]		

Visiting Officer Name: N LEIGH

Date/Time: 1032 021225

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 10-35

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD
Occupant Name(If provided)	N/K	Contact Mob/Email	N/K
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other CARAVAN	Vehicle Registration (Please provide full description if no registration)	N/K.
Children	Yes / No Ages: Male Male/Female occupant	Health Problems Declared (Include metal health conditions if disclosed)	N/K.
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer	[redacted] Docs handed to occupant Occupied but not willing to engage		

Visiting Officer Name: Date/Time:

L5

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	021225	Location	CIRCULAR ROAD
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	N/L
Vehicle Type	~~Caravan/Car/Van/Lorry~~/ Other BUS	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	Yes / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes) NO	Outpatient (state clinic location)	NO
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date) [redacted]		
Current supporting agencies	(Enter details of current support being received) NONE		
Other notes from Visiting officer			

Visiting Officer Name: N LEIGH

Date/Time: 021225

66

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 10.40 2/12/25

(67)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other WHITE	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 16.45

8.

68

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25.	Location	CIRCULAR ROAD
Occupant Name(If provided)	N/K	Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	~~Caravan/CarVan~~/Lorry/ ~~Other~~ [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	/
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date) N/K.		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer	Unoccupied.		

Visiting Officer Name: Tim Bird

Date/Time: 10.47.

69

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	N NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 10-50

(90) (70)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2-12-25	Location	Circular Road.
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	N/K.
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~ [redacted]	Vehicle Registration (Please provide full description if no registration)	N/K.
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	Yes / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date) [redacted]		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer	Docs handed to occupant *		

Visiting Officer Name: Tim Bird.

Date/Time: 10.52.

71

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD.
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	(Caravan) Car/Van/Lorry/ Other WHITE	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 10.50

12

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)	/	Contact Mob/Email	/
Nationality	[redacted]	Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other WHITE	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	/
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes / No	Meanwhile site referral (contact details required)	Yes / No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	DID NOT WANT TO GIVE PERSONAL DETAILS.		

Visiting Officer Name: N. JONES

Date/Time: 10.58

(10)

73

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR ROAD,
Occupant Name(If provided)	N/K.	Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~ [redacted]	Vehicle Registration (Please provide full description if no registration)	N/K
Children	Yes / No Ages: N/K Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	N/K.
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer	Unoccupied.		

Visiting Officer Name: Tim Bird.

Date/Time: 10.59.

74

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	021225	Location	CIRCULAR RDS
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~ [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	[redacted]		

Visiting Officer Name: N Leigh

Date/Time: 1105 021225

75

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 11.05

(11.) (76)

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	Girdar Rd.
Occupant Name(If provided)	N/K.	Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~ [redacted]	Vehicle Registration (Please provide full description if no registration)	N/K.
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Unoccupied caravan.		

Visiting Officer Name: Tim Bird.

Date/Time: 11.04.

12.

77

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25.	Location	CIRCULAR RD.
Occupant Name(If provided)	N/K.	Contact Mob/Email	
Nationality	N/K.	Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Oth~~er Unoccupied.	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Unoccupied. [redacted]		

Visiting Officer Name: Tim Bird

Date/Time: 11.07.

78

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 11.07

79

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	021225	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: 1 Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer			

Visiting Officer Name: N LEIGH

Date/Time: 1110 021225

6.

80

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)	UNOCCUPIED.	Contact Mob/Email	N/K.
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/~~Car/Van/Lorry/ Other~~ Cream caravan.	Vehicle Registration (Please provide full description if no registration)	N/K.
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date) N/K.		
Current supporting agencies	(Enter details of current support being received) N/K.		
Other notes from Visiting officer	[redacted]		

Visiting Officer Name: Tim Bird

Date/Time: 10.32

81

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	2.12.25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN ATTENDANCE		

Visiting Officer Name: N. JONES

Date/Time: 11.11.

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ11

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ11

Occupied vehicle

Reply to Steve Eyers
Mobile 07585103580
Office 0117 922 2100
E-mail Steve.eyers@bristol.gov.uk

Your ref Civica
Date

Unauthorised encampment

Dear Occupier of vehicle: .....

Location: ....

With regard to your occupancy of the above-mentioned land, I would inform you that I have visited today, but you were not on the site at the time of our visit. As such I would ask that you please provide the information requested below to the above named officer.

This information will enable Bristol City Council to contact you and obtain relevant information to help decide how to deal with the encampment and identify any welfare needs/support of the vehicle occupants. Please state below the dates and times you will be available in the next 14 days, to enable an officer from the council to visit you.

Date/Time available:.....

Please note that if you do not get in touch within 7 days, a decision may be made with regards to the encampment, without your input.

Name of Occupants and date of birth	Contact Number if Applicable

Neighbourhood
P O Box 3399
Bristol
BS1 9NE

Kurt James
Neighbourhood Services Manager
Regultory Services

Website
www.bristol.gov.uk

bsi. ISO 10002 Customer Satisfaction Management

Support and guidance for Housing/homelessness is available at the following:

St Mungo's Outreach Team 0300 500 0914, mailto:bristolstreetconcern@mungos.org

St. Mungo's directly by emailing bristolspot@mungos.org.

Bristol City Council Homelessness and Housing Advice on 0117 352 6800

Citizen Service Point 100 Temple Street Bristol BS1 6AG, Tel 0117 9222000

SARI (Stand against Racism & Inequality)https://www.sariweb.org.uk/help-support/online-reporting-form/ or ring 0800 171 2272 (freephone)

Bristol City Council temporary sites contact Meanwhile.sites@bristol.gov.uk, (For registering for Pitches on BCC secure sites). Tel 01179224337

Bristol City Council's Neighbourhood Enforcement Team(NET) 0117 9222100

I have also attached a copy of the Bristol City Community Pact, which outlines standards and values of living in a vehicle in Bristol and details for the Meanwhile sites access in the City.

Yours Sincerely

Steve Eyers

Neighbourhood Enforcement Team

Neighbourhood
P O Box 3399
Bristol
BS1 9NE

Kurt James
Neighbourhood Services Manager
Regultory Services

Website
www.bristol.gov.uk

bsi. ISO 10002 Customer Satisfaction Management

Bristol City Council Meanwhile sites

Bristol City Council (BCC) have a number of pitches on sites for Vehicle Dwellers around the city that you are most welcome to apply for. These pitches are known as Meanwhile Sites and come with four things:

Fresh water

Chemical toilets and

sewage waste disposal Waste bins

The security of knowing that you do not have to park on the kerbside and will not be moved on.

The different Meanwhile sites have between 10 and 23 pitches and are available for varying lengths of time from a few months to over a year. Pitches cost £30 per pitch per week and you will be asked to sign a Site Licence Agreement which means that you can apply for the housing element of Universal Credit to cover this cost.

You will need to have a Bristol connection to access the sites and we will need to see (but not keep) photo ID. If you'd like to have a pitch on one of our sites, or would like to know more, please email us at:

Email: Meanwhile.Sites@bristol.gov.uk

or call us on **0117 922 4337**

Neighbourhood
P O Box 3399
Bristol
BS1 9NE

Kurt James
Neighbourhood Services Manager
Regultory Services

Website
www.bristol.gov.uk

bsi. ISO 10002 Customer Satisfaction Management

Community Pact for Vehicle Dwellers and Bristol City Council
Standards and values of living in a vehicle in Bristol.

Opportunities for Vehicle Dwellers

Bristol City Council (BCC) aims to be a fair and equitable place to live. We want to ensure that all our residents can live as a safe, harmonious, and hardworking community of one Bristol. We want all residents together to feel an ownership and a pride in their city be they homeowners, tenants, vehicle dwellers or boaters; regardless of age, disability, gender, race, religion or sex.

The aim of this document is to provide a community pact so that we may have a common understanding, to foster ongoing good relations and to jointly agreed values and principles to living together in what is officially the Best City in Britain [*Sunday Times, 2017*].

It is created in good faith with the intension of fulfilling due diligence to the public sector equality duty - striving to eliminate unlawful discrimination, harassment and victimisation.
It is intended to advance equality of opportunity between people who share a protected characteristic and those who do not.

This document has come about through our continued aim to provide different site options for vehicle dwellers. When the first Covid lockdown came in March/April 2020, BCC set up 2 sites specifically for Bristol vehicle dwellers that allowed a place to park up with a safe distance between pitches that could not be guaranteed on the roadside. Over 90 people have moved through the sites since they started, and we have identified a much larger group of people living in vehicles than we previously estimated. We also found that there is considerable demand to live on some form of official site and as a result, we set up our first “meanwhile site” in Knowle West.

Within this document, you will find information relevant to both meanwhile site and roadside dwellers and hope that it can help to set a benchmark for Bristol as a lead in vehicle dwellers and Local Authorities working together.

Meanwhile Sites

Meanwhile sites are pieces of land, owned by BCC that are currently unused, but earmarked for future development into either housing or commercial use. It was suggested that, where suitable, some of these sites – ones that won’t be built on for some time – could be used for vehicle dwellers in the meanwhile, hence the name. The first site in Knowle West quickly filled and we have a large waiting list already for any future meanwhile provision.

Meanwhile sites come with minimal services attached to them, but ones that were identified as necessary as a result of a community consultation in collaboration with Bristol Vehicles for Change. These are: Water, sewage and grey water disposal, rubbish collection and that is all. The biggest advantage that meanwhile sites offer is the security of knowing that you pitch is safe and you will not be asked to move on while the site is open.

Neighbourhood
P O Box 3399
Bristol
BS1 9NE

Kurt James
Neighbourhood Services Manager
Regultory Services

Website
www.bristol.gov.uk

bsi. ISO 10002 Customer Satisfaction Management

City of Sanctuary
A 'City of Sanctuary' is a place where a broad range of local people, organisations, community groups, schools and faith communities, as well as local government, are publicly committed to welcoming and including people fleeing violence and persecution.

Valuing our Residents
Bristol has a relatively large vehicle dweller population when compared to other cities with similar demographics to ours and we recognise that the vehicle dwelling community is diverse and is made up of ethnic Gypsy, Roma and Travelling people as well as cultural travellers, migrant workers, show people, circus people, professionals, retired individuals and a host of others. Bristol is clear that all residents, regardless of where or how they live are important to our city's inclusive community.
We know that, in the past, some parts of Bristol have felt that vehicle dwelling has presented challenges to some communities, at BCC we aim to work together to recognise that vehicle dwellers can bring a richness and diversity to our municipal environment and are a part of making Bristol what it is.

Safety, Security and Action Against Hate Crime
Bristol City Council do not tolerate any crime or antisocial behaviour targeted towards any resident of, or visitor to, our city. BCC will ensure that the safety and security of vehicle dwellers remains as high a priority among various statutory services as any other sector of the city.
Through our partnership with other agencies, the GRT Service Coordinator can arrange advocacy for Travellers and vehicle dwellers affected by crime, if required, to ensure that their case is handled fairly and appropriately. Living in a vehicle may provide a greater degree of vulnerability, but it does not mean that access to services are any less than for any other householder.
It is the expectation of Bristol City Council that vehicle dwellers will park legally, safely and not carry out any anti-social behaviour that may lead to community tensions.

Communication
The City Council commits to keep talking with vehicle dwellers, through the range of different representative groups (as outlined in the section below on "Vehicle Dweller Representation"), on all aspects of policy, procedure, new and potential sites which may affect them. In addition, there is a commitment to maintain our close working relationship with all vehicle dweller groups to ensure an easy mutual flow of information to further develop trust and rapport between groups and the City Council.

Dealing with complaints
Should any incident of crime against a vehicle dweller occur, the complaint should in the first instance be reported to Avon and Somerset Police.

BCC will ensure that there is an equity of response to any complaints either made about or received from vehicle dwellers. BCC will ensure that all sides of any dispute are equally heard and respected.

Expectations of Bristol City Council and the Bristol community.

Please note that within the sections below, a difference is drawn between encampments on the highway and those on sites. "Sites" are defined as:
- Permanent sites: There are currently no permanent vehicle dweller sites in Bristol
- Temporary sites: There are currently two temporary sites in use – A site set up for Covid-19 safe distancing and tolerated unauthorised site
- Meanwhile sites: There is currently one meanwhile site in use

Vehicles
All vehicles, whether self-propelled or towed, should be safe, roadworthy and legal. This applies to all vehicles on the highway or on sites.

Parking on the highway
All vehicles parked on the public highway should be road legal and in the case of vehicles designed to be self-propelled be taxed, insured and have a valid MOT. All vehicles must be fitted with suitable reflectors in line with the Highway Code.

Vehicles should be parked on the road compliant with all traffic and road markings including maximum waiting limits, areas of permit parking, etc.

No part of any vehicle or vehicle dwellers encampment should be touching, overhanging or in any way encroaching on the pavement or kerb; this includes such items as awnings, planters, furnishings, storage, etc. Vehicle dwellers should be mindful of pedestrians when opening doors onto the pavement and should ensure that doors remain closed or tied back so as not to cause any obstruction.

Vehicle must be parked at least 5 metres in every direction from any road junction and dwellers should ensure that their vehicle does not cause any obstruction or blind spot for road users. Vehicles must not be parked in a way that restricts the width of any road in such a way as could impede the passing of an emergency vehicle.

Vehicles parked on the roadside should not be parked in any way that obstructs driveways, gateways or vehicular or pedestrian access to any property. This includes allowing a practical turning space for vehicles to enter a property and does not present any restriction in visibility that may affect the safety of other road users.

Wherever possible, vehicles should be parked with the flow of traffic and with their main access doors egress onto the pavement and not into an open road.

Health and Hygiene
The below sections apply to all vehicles whether on the highway or on sites.

All human waste should be disposed of correctly and in accordance with public health guidelines. Storm drains and gutters must not be used for the disposal of faeces, urine, grey water or anything other than pure water. Chemical, compost or any other type of toilet must be emptied appropriately at locations designed to accept them. Public urination and defecation are completely unacceptable and will not be tolerated.

Vehicle dwellers must maintain an awareness of local rules about burning different fuel types within their vehicles and should have an awareness of the impact of smoke and other pollutants on neighbouring properties.

No open fires, fire pits, chimineas, barbecues or similar that produce an open flame, heat source or smoke are permitted either on the public highway or on City Council operated sites.

Behaviours
All highway and site vehicle dwellers to abide by the same standards of acceptable behaviour as are expected of any home dweller across the city. Further information on BCC Antisocial Behaviour policies can be found here. Some of the specific BCC provision for vehicle dwellers (such as permanent, temporary and meanwhile sites) will have additional rules specific to location. All residents will be asked to sign up to these before joining any site.

Effects on neighbours and neighbourhoods
All vehicle dwellers whether parked on the highway or sites must always remain respectful to their neighbours, neighbourhoods, properties that overlook them and properties over whom they may

Neighbourhood
P O Box 3399
Bristol
BS1 9NE

Kurt James
Neighbourhood Services Manager
Regultory Services

Website
www.bristol.gov.uk

bsi. ISO 10002 Customer Satisfaction Management

overlook. Any nuisance behaviour will be addressed in the same manner as would happen with any other member of the Bristol community.

Enforcement

The city council has a policy and procedure for managing vehicle dwelling encampment on the highway. The council recognises that people live in vehicles for a range of reasons and the policy provides a measure of tolerance where the impact of vehicle dwelling is not high. Where an encampment is, however, considered to be having a high impact, enforcement action may be taken. Information on enforcement policy can be found here.
https://www.bristol.gov.uk/files/documents/1779-bcc-vehicle-dwelling-encampment-policy-final2

Vehicle Dweller Representation

Organisations working with Bristol City Council who represent vehicle dwellers in the city (listed alphabetically)

BCC GRT Team

The GRT Team have a large number of vehicle dwellers with whom we have frequent regular contact and who belong to none of the other groups within this list. They provide a good cross section of vehicle dwellers and are well connected within the community. As a "group" they can be relied on to feedback honest and unbiased opinions for the GRT Team.
More information about Gypsy, Roma and Travellers in Bristol can be found here.
To contact the GRT Team, email: gypsy.travellers@bristol.gov.uk

Bristol Vehicles for Change

Bristol Vehicles for Change is a registered non-profit CIC and community group run by and for people living in vehicles. They exist to protect and advance the rights of vehicle dwellers in the Bristol area to live freely and creatively, while connecting with wider communities to encourage acceptance and understanding of each other. They aim to bring about practical solutions through building positive relationships between communities, local authorities and other stakeholders.
Contact Bristol Vehicles for Change at: hello@vehiclesforchange.co.uk
or call on 07395 327112

GR8T+ Bristol (Gypsy, Roma, Traveller plus anyone from an ethnic and cultural Traveller background) – formerly the **Bristol GRT Voices Group**.
To influence positive change and challenge negative perceptions relating to the GR8T+ community.
To provide an independent voice for the GR8T+ community - ran by the GR8T+ community, for the GR8T+ community.
To represent the needs of the GR8T+ community in various forums and events.
To empower and voice the opinions of the GR8T+ community to authorities and other relevant bodies.
To identify, promote and develop the skills, expertise within the GR8T+ community.

Golden Key

Golden Key is a partnership between statutory services, commissioners, the voluntary sector and people with lived experience across Bristol. They work together to improve services for Bristol citizens with the most complex needs.
Contact Golden Key at info@goldenkeybristol.org.uk
or call on +44 (0)117 909 6630

Kingswear Road site group

A non-organised group centred around the 11 households currently living at Kingswear Road.

Parrys Lane Supporters Club

To continue to maintain and improve the area known as Parrys Lane for the benefit of the Van dwellers and conventional residents in the local area; to encourage the goodwill and involvement of the wider community; to work alongside Bristol City Council to find amicable solutions to issues related to van dwelling in the local area and Bristol area.
Contact the supporters club at davidturton@plsc.uk
or call on 07597 966816

SARI – Stand Against Racism and Inequality
The GRT Team commission a worker from SARI to work part time with the team, employed to tackle hate crime within the wider GRT community. The worker has a large number of contacts across different ethnic and cultural travellers, probably the largest database of contacts of any group.
Contact SARI at sari@sariweb.org.uk or on 0117 942 0060

Unnamed group
A loosely based, self-organised group without constitution made up of 15 to 20 vehicle dwelling households currently living on the same encampment but still providing a strong representative voice for their community.

Neighbourhood
P O Box 3399
Bristol
BS1 9NE

Kurt James
Neighbourhood Services Manager
Regultory Services

Website
www.bristol.gov.uk

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ12

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ12

Photo Album KJ11

Exhibit Reference: 468584

Location: The Downs

Dated: 02/12/2025

[redacted]



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached

[redacted]



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached

[redacted]



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Letter handed in person



[redacted]



Letter handed in person



[redacted]



Letter handed in person



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Letter handed in person



[redacted]



[redacted] attached



[redacted]



Dweller Letter attached

[redacted]



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Letter handed in person



[redacted]



Handed in person

[redacted]



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Letter handed in person



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached

[redacted]



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached



[redacted]



Dweller Letter attached

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ13

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ13

Dear Vehicle Occupant

It has come to our attention that you have been occupying a part of the area of Highway known as ……, Bristol, by living in a

vehicle Namely ……..

Bristol City Council, whilst having permitted the encampment to date, does not give permission for the public highway to be used in this way and I must therefore ask you to vacate the highway. Failure to do so may result in Bristol City Council taking legal proceedings to remove you and the vehicles from the highway. Any caravans or vehicles that appear to be abandoned will also be removed.

This encampment has now been re-assessed as High Impact due to the issues listed below and you are requested to vacate the area within **14 days**.

Anti-social behavior (ASB), Including Drugs/Alcohol abuse		Inappropriate disposal of human and general waste	
Proximity to residential properties		Size and concentration	
Proximity to schools, children's playgrounds and other public amenities		Vehicle(s) is/are parked in a way which endangers either those living in the vehicles and/or road users	
High noise or smoke levels		Nature, suitability or obtrusiveness	

Support and guidance for Housing/homelessness is available at the following:
St Mungo's Outreach Team 0300 500 0914, mailto:bristolstreetconcern@mungos.org
SIRONA Homelessness Support (Remedy BNSSG ICB)
St. Mungo's directly by emailing bristolspot@mungos.org.
Bristol City Council Homelessness and Housing Advice Team on 0117 352 6800
Citizen Service Point 100 Temple Street Bristol BS1 6AG, Tel 0117 9222000
SARI (Stand against Racism & Inequality)https://www.sariweb.org.uk/help-support/online-reporting-form/ or ring 0800 171 2272 (freephone
KOMPASI a new website listing services for asylum seekers and refugees: kompasi.org/
Bristol City Council temporary sites contact Meanwhile.sites@bristol.gov.uk, (to register)

Bristol City Council's Neighbourhood Enforcement Team 0117 9222100
Date *(Officer: NEO Steve Eyers)*

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ14

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ14

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11/12/2025.	Location	PADDYS LANE
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	
Vehicle Type	~~Caravan~~/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / ~~No~~ Ages: [redacted] Male/~~Female~~	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	~~Yes~~ / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	~~Yes~~/No	Meanwhile site referral (contact details required)	~~Yes~~/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer			

Please continue on rear if more space required for information provided.

89

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11/12/2025	Location	PARRYS LANE.
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT OCCUPIED — LOCKED.		

Please continue on rear if more space required for information provided.

85

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11/12/25	Location	Pottys Lane
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	Not occupied on visit. Unable to assess		

Please continue on rear if more space required for information provided.

Thomas Lawrence

11/12/25
13:18

35

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11/12/25	Location	Saville Road
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	/
Vehicle Type	(Caravan)/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes /(No) Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	(Yes) / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes /(No) (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	(Yes)/No	Meanwhile site referral (contact details required)	(Yes)/No [redacted]
Referred for further Welfare support	(State to whom referred/Referral date) [redacted]		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer	[redacted]		

Please continue on rear if more space required for information provided.

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11/12/25	Location	Saville Road
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	No
Vehicle Type	(Caravan)/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	(Yes) / No [redacted] Ages: [redacted] Male/Female [redacted]	Health Problems Declared (Include metal health conditions if disclosed)	NO
GP Registered	Yes / (No)	Surgery Location/GP	N/a
Immediate medical assistance required	Yes / (No) (State reason if Yes)	Outpatient (state clinic location)	N/a
Housing referral required	(Yes)/No	Meanwhile site referral (contact details required)	(Yes)/No
Referred for further Welfare support	(State to whom referred/Referral date) [redacted]		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer			

Please continue on rear if more space required for information provided.

Thomas Lawrence 11/12/25 14:01

38.

NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11/12/2025.	Location	SAVILLE RD
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other	Vehicle Registration (Please provide full description if no registration)	
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	CHANGED MIND - DIDNT WANT TO PROVIDE DETAILS		

Please continue on rear if more space required for information provided.

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	17/12/2025	Location	Saville Rd.
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No [redacted]
Referred for further Welfare support	(State to whom referred/Referral date) [redacted]		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	[redacted]		

Please continue on rear if more space required for information provided.

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11-12-25	Location	~~LADY'S MILE~~ CIRCULAR ROAD
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	NO
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	[redacted]
Children	Yes / (No) Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	(Yes) / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	[redacted]
Housing referral required	(Yes)/No	Meanwhile site referral (contact details required)	(Yes)/No
Referred for further Welfare support	(State to whom referred/Referral date) - NONE		
Current supporting agencies	(Enter details of current support being received) NONE		
Other notes from Visiting officer	[redacted]		

Please continue on rear if more space required for information provided.

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11 12 25	Location	CIRCULAR RD
Occupant Name(If provided)		Contact Mob/Email	
Nationality		Interpreter required (state Language required)	
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer	NOT IN		

Please continue on rear if more space required for information provided.

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11.12.25 12.55.	Location	CIRCULAR ROAD.
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	N/A.
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	NA.
GP Registered	Yes / No	Surgery Location/GP	[redacted]
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No	Meanwhile site referral (contact details required)	Yes/No.
Referred for further Welfare support	(State to whom referred/Referral date)		
Current supporting agencies	(Enter details of current support being received)		
Other notes from Visiting officer			

Please continue on rear if more space required for information provided.

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NET Vehicle Dweller Welfare Check Sheet/Referral form			
Date of Visit	11-12-25	Location	CIRCULAR RD
Occupant Name(If provided)	[redacted]	Contact Mob/Email	[redacted]
Nationality	[redacted]	Interpreter required (state Language required)	NO
Vehicle Type	Caravan/Car/Van/Lorry/ Other [redacted]	Vehicle Registration (Please provide full description if no registration)	
Children	Yes / No Ages: Male/Female	Health Problems Declared (Include metal health conditions if disclosed)	[redacted]
GP Registered	Yes / No	Surgery Location/GP	
Immediate medical assistance required	Yes / No (State reason if Yes)	Outpatient (state clinic location)	
Housing referral required	Yes/No if please contact.	Meanwhile site referral (contact details required)	Yes/No Completed
Referred for further Welfare support	(State to whom referred/Referral date) [redacted]		
Current supporting agencies	(Enter details of current support being received) [redacted]		
Other notes from Visiting officer			

Please continue on rear if more space required for information provided.

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ15

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ15

Photo Album

Exhibit : KJ/13

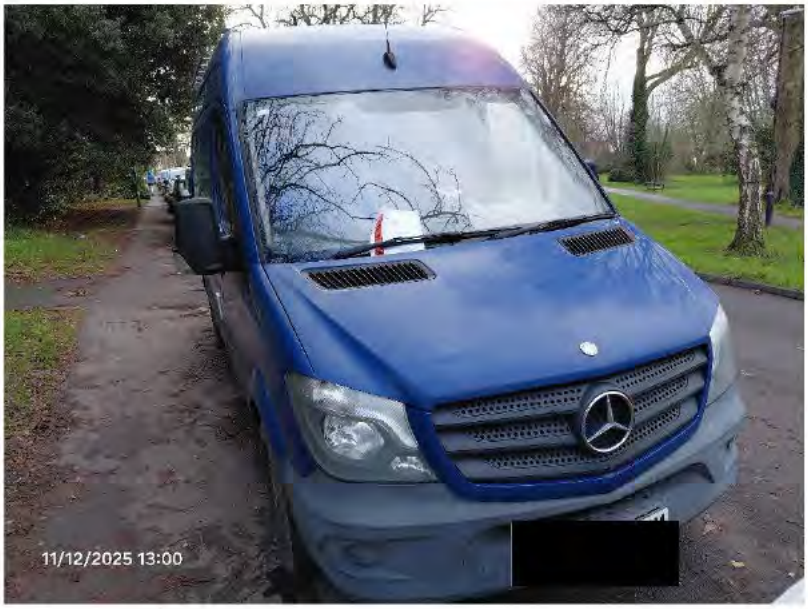
Location: Clay Pitt Rd. Westbury Park, Parrys Lane & Saville Road

Date taken: 11/12/2025 Steve Eyers

Civica: 468584



[redacted]





[redacted]





[redacted]





[redacted] [redacted]





[redacted]





[redacted] [redacted] Occupants refused to engage

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ16

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ16

Welfare assessments conducted on the Highways around The Downs

Vehicle No.	Description of Vehicle and NET no.	Date of attendance & Location	Occupant details (if applicable)
1.	(1) [redacted] [redacted] (White) [redacted]	02.12.2025 Clay Pitt Road	Not occupied at time of visit
2.	(2) Van [redacted]	02.12.2025 Clay Pitt Road	Not occupied at time of visit
3.	(3) Caravan [redacted]	02.12.2025 Clay Pitt Road	Not occupied at time of visit – padlocked.
4.	(4) Van [redacted]	02.12.2025 Westbury Park	Not occupied/ no response at time of visit
5.	(6) Van [redacted]	02.12.2025 Westbury Park	Not occupied at time of visit It is believed that occupant has gone abroad for 6 months.
6.	(7)	02.12.2025	Not occupied at time of visit

Welfare assessments conducted on the Highways around The Downs

	Van [redacted]	Westbury Park	
7.	(8) Van [redacted]	02.12.2025 Westbury Park	Not occupied at time of visit
8.	(9) Van [redacted]	02.12.2025 Westbury Park	Not occupied at time of visit
9.	(10) Van [redacted]	02.12.2025 Westbury Park	[redacted]
10.	(11) Lorry [redacted]	02.12.2025 Westbury Park	Not occupied at time of visit
11.	(12) Caravan	02.12.2025 Roman Road	Not occupied at time of visit

Welfare assessments conducted on the Highways around The Downs

	[redacted]		
12.	(13) Lorry [redacted]	02.12.2025 Roman Road	Occupant did not want to engage. Refused paperwork.
13.	(14) Van [redacted] [redacted]	02.12.2025 Roman Road	Not occupied at time of visit
14.	(15) Car [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit
15.	(17) Caravan [redacted] [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit
16.	(18) Caravan [redacted] [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit. Appeared abandoned
17.	(19) [redacted]	02.12.2025 Parry's Lane	[redacted]. No assessment conducted.
18.	(20) Caravan	02.12.2025 Parry's Lane	Not occupied at time of visit

Welfare assessments conducted on the Highways around The Downs

	[redacted]		
19.	(21) Caravan [redacted]	02.12.2025 Parry's Lane	[redacted] Occupant cooperating and informed he would contact the team.
20.	(22) Caravan [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit
21.	(23) Caravan [redacted]	02.12.2025 Parry's Lane	Occupant hostile Paperwork refused and thrown away
22.	(24) Caravan [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit
23.	(25) Caravan [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit
24.	(26) Caravan [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit

Welfare assessments conducted on the Highways around The Downs

25.	(27) Caravan [redacted]	02.12.2025 Parry's Lane	[redacted]
26.	(28) Caravan [redacted]	02.12.2025 Parry's Lane	Occupant did not wish to engage with the team. Paperwork refused and thrown.
27.	(29) Caravan [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit
28.	(30) Lorry [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit. Smashed windscreen and door open.
29.	(31) Caravan [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit
30.	(32) Caravan [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit

Welfare assessments conducted on the Highways around The Downs

31.	(33) [redacted]	02.12.2025 Parry's Lane	[redacted]
32.	(34) [redacted]	02.12.2025 Parry's Lane	Not occupied at time of visit
33.	(26) Caravan [redacted]	11.12.2025 Parry's Lane	[redacted]
34.	(84) Caravan [redacted]	11.12.2025 Parry's Lane	Not occupied at time of visit
35.	(85) Van [redacted]	11.12.2025 Parry's Lane	Not occupied at time of visit
36.	(35) Caravan [redacted]	02.12.2025 Saville Road	Not occupied at time of visit – padlocked
37.	(36) Caravan	02.12.2025 Saville Road	Not occupied at time of visit. Informed by passerby that it is abandoned

Welfare assessments conducted on the Highways around The Downs

	[redacted]		
38.	(40) Caravan [redacted]	02.12.2025 Saville Road	Not occupied at time of visit. Vehicle unsecure
39.	(41) Caravan [redacted]	02.12.2025 Saville Road	Not occupied at time of visit. Cat seen inside Caravan from window. Appeared locked
40.	(42) Caravan [redacted]	02.12.2025 Saville Road	Not occupied at time of visit. Caravan locked
41.	(43) [redacted]	02.12.2025 Saville Road	Not occupied at time of visit.
42.	(35) Caravan [redacted]	11.12.2025 Saville Road	[redacted] Waiting to hear about towing his vehicle to another location and is awaiting funds
43.	(39) Caravan [redacted]	11.12.2025 Saville Road	[redacted]
44.	(38)	11.12.2025	Occupant did not want to engage and provided no details

Welfare assessments conducted on the Highways around The Downs

	Caravan	Saville Road	
45.	(41) Caravan [redacted]	11.12.2025 Saville Road	[redacted]
46.	(44) Campervan [redacted]	02.12.2025	Not occupied at time of visit.
47.	(45) Van [redacted]	02.12.2025 Circular Road	Occupant refused to engage and provide details
48.	(46) Caravan [redacted]	02.12.2025 Circular Road	Occupant did not engage.
49.	(49) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
50.	(50)	02.12.2025	Not occupied at time of visit.

Welfare assessments conducted on the Highways around The Downs

	Van [redacted]	Circular Road	
51.	(51) Van [redacted]	02.12.2025 Circular Road	Occupant did not want to engage and provide details.
52.	(52) Van [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
53.	(54) Van [redacted]	02.12.2025 Circular Road	[redacted]
54.	(55) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
55.	(56) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.

Welfare assessments conducted on the Highways around The Downs

56.	(57) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
57.	(58) Caravan [redacted]	02.12.2025 Circular Road	Occupant did not give name
58.	(59) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
59.	(60) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
60.	(61) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
61.	(62) Caravan	02.12.2025 Circular Road	Not occupied at time of visit.

Welfare assessments conducted on the Highways around The Downs

	[redacted]		
62.	(63) Van [redacted]	02.12.2025 Circular Road	Not occupied at time of visit. [redacted]
63.	(64) Caravan [redacted]	02.12.2025 Circular Road	[redacted] occupant did not want to speak and engage with the team. Papers handed to occupant
64.	(65) Bus [redacted]	02.12.2025 Circular Road	[redacted]
65.	(66) Carvan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
66.	(67) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.

Welfare assessments conducted on the Highways around The Downs

67.	(68) Lorry [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
68.	(69) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
69.	(70) Caravan [redacted]	02.12.2025 Circular Road	[redacted]
70.	(71) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
71.	(72) Caravan [redacted]	02.12.2025 Circular Road	Occupant did not want to give any personal details. Welfare assessment could not be completed.
72.	(73) Carvan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.

Welfare assessments conducted on the Highways around The Downs

73.	(74) Caravan [redacted]	02.12.2025 Circular Road	
74.	(75) Carvan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
75.	(76) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
76.	(77) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
77.	(78) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
78.	(79) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.

Welfare assessments conducted on the Highways around The Downs

79.	(80) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
80.	(81) Caravan [redacted]	02.12.2025 Circular Road	Not occupied at time of visit.
81.	(45) Camper Van [redacted]	11.12.2025 Circular Road	[redacted]
82.	(42) Caravan [redacted]	11.12.2025 Circular Road	Not occupied at time of visit. [redacted]
83.	(60) Caravan [redacted]	11.12.2025 Circular Road	[redacted]
84.	(74) Caravan	11.12.2025 Circular Road	[redacted]

Welfare assessments conducted on the Highways around The Downs

	[redacted]		

On behalf of: Claimant
Witness: Kurt James
Statement: 1st
Exhibit: KJ17

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

Exhibit KJ17

Welfare assessments – vulnerabilities and support offered

Vehicle No.	Date of attendance & Location	Health conditions	Support Offered and any Referrals
1.	02.12.2025 Parry's Lane	[redacted]	The NET made a Meanwhile site referral.
2.	11.12.2025 Parry's Lane	[redacted]	The NET referred occupant for further support in relation to Housing via a Meanwhile site referral and a Housing referral to St Mungos.
3.	11.12.2025 Saville Road	[redacted]	Occupant is already on the Meanwhile site referral list. The NET also referred occupant to St Mungos for Housing support.
4.	11.12.2025 Saville Road	[redacted]	No referrals necessary moving out of city.
5.	02.12.2025 Circular Road	[redacted]	Occupant already on Meanwhile site waiting list. Informed no housing referral is required.

Welfare assessments – vulnerabilities and support offered

		[redacted]	
6.	02.12.2025 Circular Road	[redacted].	The NET made a referral for a Meanwhile site. Occupant does not want a referral made for housing support.
7.	02.12.2025 Circular Road	[redacted]	A referral for a Meanwhile site has been made. In contact with the GRT team. Occupant does not want a referral made for housing support.
8.	02.12.2025 Circular Road	[redacted].	A referral made for Meanwhile site. Occupant does not require referral for housing support.
9.	11.12.2025 Circular Road	[redacted]	The NET referred [redacted] for further support in relation to Housing via a Meanwhile site referral and a Housing referral to St Mungos.
10.	11.12.2025 Circular Road	[redacted]	The NET made referrals for housing support to Meanwhile site. Informed they do not want to be referred to St Mungos for support.

Welfare assessments – vulnerabilities and support offered

		[redacted]	

On behalf of: Claimant
Witness: Kurt James
Statement: 2nd
Exhibits:
Date:26.02.2026

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N:-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

SECOND WITNESS STATEMENT OF
KURT JAMES

I, Kurt James of The Neighbourhood Enforcement Team, Bristol City Council, 100 Temple Street, Redcliffe, Bristol, BS1 6AG will say as follows:

1. I am employed by the Claimant as the Neighbourhood Enforcement and Street Scene Manager within Bristol City Council and make this second statement to provide an update to the Court ahead of the Trial listed on 16 and 17 April 2026.

2. In making this statement I have carried out a number of enquiries and instructed my team to carry out various tasks to ensure that the Court has the fullest possible picture at the Trial, in relation to the reasons why the Claimant seeks the relief it does. I also want to provide assurance to the Defendants of the reasons why the Claimant is seeking an Order for possession and an Injunction. I also want to try

and assure them that there will be assistance given in respect of the Council having to fulfil various statutory obligations. My team are also trying as far as we possibly can to assist the Defendants who would be required to move from the Downs with alternative accommodation provision, and if that was not possible what other support the Claimant might be able to provide under a number of its statutory functions.

3. In making this statement I have had discussions with representatives from St Mungos, the Claimant's Homelessness team and colleagues in Adult Social Care. I have also had the benefit of a brief discussion with representatives from BHAM following the hearing on 5 February 2026. It is of course the Claimant's case that the use of any part of the Downs, be it the roads, or the grassed areas, as any form of residence is not appropriate. I have written at great length about this in my first statement. A number of other points have been made about the problems of residential living on the Downs by representatives of Protect the Downs ('PTD') and their legal advisers. Obviously, I balance the difficulties the Defendants will encounter against the problems which have been reported to the Claimant and which my team have investigated for themselves, together with the very detailed evidence provided by Caroline Ennion and the information provided by PTD.

4. It can be seen from my first statement and Caroline Ennion's three statements that there is a considerable problem of nuisance caused by the vehicles which are currently trespassing on the roads (all of which are public highways for which the Claimant is responsible as the Highway Authority). Until the first Injunction was obtained, additionally caused by other travellers camping on the Downs, disrupting a number of organised events and damaging the Downs infrastructure itself.

<u>Present position</u>

5. As detailed in my first statement the NET visited the van dwellers on the roads on 2 and 11 December 2025. Exhibit KJ10 are the responses to the 2 December 2025 visits and KJ14 are the response to the 11 December 2025, they are appropriately redacted so as not to reveal any personal information. There were a number of

van dwellers who were not present at the time of the visit. Notices were placed on the vehicles. I spoke to this and exhibited a copy of this form of notice at exhibit KJ13 of my first witness statement. We have not been contacted by any of the other vehicle dwellers for support.

6. In relation to responses to the notices, we have received a number, and actions have been taken. We have given thought to the information provided and made onward referrals as I set out below.

Housing referrals

7. Following the NET team's attendance, we provided all the names and details of the individuals who requested support with housing to St Mungos (Homelessness Charity) for them to offer support and advice to these individuals. The reason for doing this in isolation is that St Mungos are commissioned by the Claimant to provide outreach services (and provide an excellent response to persons who are rough sleeping in Bristol and engage the services provided by our Streetwise project). Furthermore, in relation to vehicle dwellers St Mungos employ 2 dedicated workers. Their remit is to provide support and assistance as necessary with a view to helping them find accommodation.

8. On 25.02.2026, I contacted St Mungos to seek an update on the support they had so far offered, and I was informed by them that although they have engaged with and provided support to vehicle dwellers it is important that details remain privileged to protect the relationships that they have developed, which is supported by the data sharing agreement that they have with the local authority. They are a valued partner, and I am confident that work is being done and positive outcomes have been achieved.

9. This is an ongoing process. I am confident that they continue to work with these individuals as well as others located on the Downs roads to see what assistance can be offered. The situation is of course fluid, and I have to keep abreast of any changes in the number of vehicles and especially have regard to any further

arrivals so that we can engage with them as well and making the appropriate referrals as necessary.

Meanwhile site referrals

10. A number of van dwellers we interviewed specifically expressed that they would like referrals to be made for a pitch on a meanwhile site. In relation to that I spoke to Ian Bowen the GRT Manager who leads on Meanwhile Site project for the Claimant in relation to the current progress on the provision of such sites.

11. At present, the Claimant currently operates 6 Meanwhile Sites. They have a current capacity of 79 pitches and 70 are currently occupied. However, there are advanced arrangements in place for 1 further site providing 19 pitches and the current progress of the implementation is to have the site open by 1 May 2026.

12. So, by this process which is not set in stone it could be that 28 pitches become available by 1 May 2026 although, as previously stated, we do have an active waiting list in place. I cannot say at the present time, if all of the persons we have identified, and perhaps other persons who have come on the Downs since conducting the welfare assessments will be eligible for a meanwhile site pitch, or will even want one, but this will go a long way to relieving the sheer number of vehicles currently encamped on the Downs.

13. The GRT team will continue to work on matching pitches to those persons who want pitches and are eligible for them, and St Mungos will continue to provide help and assistance as well.

Additional support

14. The Welfare assessments did provide responses which indicated that a number of the van dwellers did need help and assistance beyond the relocation of their vehicle to a meanwhile site. It was that type of respondent in respect of whom a referral has been made and will be made to the Claimant's Adult Social Care team,

who will I hope to assess their eligibility for services under not only the Care Act 2014 but perhaps such legislation as the Mental Health Act 1983.

15. I can assure the Court that between my office and St Mungos this will be an ongoing process.

16. It could well be that a number of the Defendants would want something other than a Meanwhile site and would not be eligible for services under either of the statutes I have quoted in paragraph 14 but might be eligible for assistance under Homelessness legislation and can of course make their own enquiries at our Homelessness Office at 100 Temple Street. Again, this is something that St Mungos can assist with.

17. From our enquiries we have not been made aware that any children are residing in any vehicle encamped on the roads. However, in the event that we are made aware that any children are residing in a vehicle we will make the appropriate referrals to the Claimant's Children and Young People's Services to ensure that any unmet needs are catered for. This is extremely important in the event that the Claimant is successful in obtaining a possession order in respect of the roads and extension of the Injunction.

18. Logically, the children's parents / carers may well be eligible for social housing but even if not, there may well be an obligation under section 17 of the Children Act 1989. I would hope that St Mungos will take up that aspect, but I will maintain a watching brief.

19. Having detailed how we are hoping to support persons who will be impacted by the orders we seek, I now turn to the actual mechanics of enforcing those orders.

<u>Plan for enforcement of the possession order</u>

20. I briefly detailed in my first witness statement the Claimant's plan for dealing with the van dwellers and enforcement. This would probably be one road at a time over

the number of days it would take to cover all of the roads which are occupied.

21. Let me assume that the Court makes an order for possession in respect of the roads. I would hope that the Injunction is extended in duration and ambit and will cover all of the roads in respect of which the possession order is granted.

22. The first thing that needs to be considered is whether it would be an Order for Possession forthwith (depending on the nature of the challenges made to the Claimant's proceedings) whether we would be able to agree with the Defendants a longer period of time. It is extremely likely given the longevity of the trespass and the logistical matters that I will go on to explain that an Order for Possession expressed in a number of days is very likely. If requested by the Court, I will give whatever form of notice the learned Judge feels is appropriate together with any such preliminary steps as are indicated might be appropriate. I will also have regard to the requirements of the High Court enforcement officers, the Police and perhaps social services/St Mungos in relation to how that exercise is performed. It is very unlikely that an eviction on one or two days would work.

23. The very likely scenario is that we will of course serve the possession order the day it is drawn by the Court. There may well then be a period of discussion with the Defendants, so we can ensure that any identified needs which have not yet been met can be the subject of referrals to appropriate agencies and to allow for time for (in an ideal scenario) to move vehicles to a Meanwhile site pitch. It will also allow for the St Mungos representatives to assist with any referrals as well. I will have to make sure that other Council departments who may be affected have time to prepare in the event they have to make any arrangements for someone who vacates or is evicted from the roads.

24. In the event we are granted the Order for Possession and those persons occupying a particular road are served with it, and the time for discussion and referrals have passed. We will then be taking steps to affect the removal of any remaining vehicles. This is where liaison with the Police and the enforcement officers team will have already taken place, but there may still be some logistical requirements

that we may have to meet, and I will have to liaise with Caroline Ennion and her colleagues in relation to protecting the grassed areas of the Downs should we have to physically remove any vehicles or items. Key to that is if it turns out the occupier(s) are accommodated by any part of the Council or a partner organisation, what we will do with their vehicle.

25. In order to accommodate vehicles we have to physically remove, because I do suspect a number of them are abandoned, we do have a process in place for the removal and storage of abandoned vehicles. Any vehicles removed by our contractor will be stored for 7 days, unless the vehicles are dangerous or in a significant state of disrepair, where they will be disposed of immediately.

26. Once a removal exercise has taken place the Injunction will be served in accordance with directions by this honourable court but it is very likely we will be adopting the same process we have adopted so far in terms of affixing the Injunction to prominent places on the Downs and ensuring that those orders are maintained in situ, as well as keeping a physical set at Temple Street, College Green and on the Council's website.

27. In order to make sure each enforcement is effectively managed. There will be close discussion with the high court enforcement officers, the Police and other Council departments and as part of this I will be arranging the following personnel to attend – NET, St Mungos, Homelessness team, Adult Social Care, Health Visitors. With these agencies and colleagues present I am confident we can offer support to those affected and impacted by the enforcements.

28. I would hope that they will have vacated the relevant road. If they have not, we would encourage the van dwellers to vacate the highways without the need for any enforcement action. We would also be able to offer any logistical support should it be required to assist them to leave.

Post eviction/Injunction enforcement

29. The Claimant has developed a procedure in the event Newcomers encamp on Durdham Down, Clifton Down and Ladies Mile. This has worked extremely well, and the same process will be continued once the roads have been finally cleared.

Conclusion

30. The Claimant cannot allow any vehicles to remain on the roads for the many reasons detailed in my first witness statement, and of course I adopt the extremely detailed issues raised by Caroline Ennion in her evidence.

31. I have spoken at a few points in this statement about High Court enforcement officers. At the moment, this case is in the County Court and in the event an order is granted in respect of the roads I respectfully seek a transfer to the High Court for enforcement.

32. I also respectfully submit that the extension of the Injunction to the roads is just and convenient for all the reasons set out in my first statement.

Statement of Truth

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

Signed:



Dated: 26 February 2026

On behalf of: Claimant
Witness: Robert Archer
Statement: 2nd
Exhibits: RA10- RA13
Date:26/02/2026

IN THE COUNTY COURT AT BRISTOL **CLAIM NO: M00BS959**

B E T W E E N :-

BRISTOL CITY COUNCIL

Claimant

AND

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

Defendants

SECOND WITNESS STATEMENT OF ROBERT ARCHER

I, Robert Archer, of Traffic and Highway Maintenance, 100 Temple Street, Bristol, BS1 6AG will say as follows:

1. I am employed by Bristol City Council as the Highways Technical Officer in the Highway Maintenance and Assets Team and am duly authorised to make this statement. Part of my role includes highways responsibility for the streets named Parrys Lane, Saville Road, Downleaze, Rockleaze, Circular Road, Roamn Road,Westbury Park and Clay Pitt Road, Durdham Down in the Wards of Stoke Bishop & Westbury on Trym & Henleaze.

2. Bristol City Council is the Highway Authority and as such responsible for the maintenance of the street. Please refer to Exhibit RA1 in my first witness statement**,** a plan showing the extent of the adopted highway for all roads maintained by Bristol City Council on land owned by Bristol City Council's Downs Committee. I make this second statement in relation to Stoke Road and Wills Lane.

3. Our Highway Register (list of streets maintainable at the public expense) shows that Stoke Road is an adopted highway but does not provide the date of formal adoption. Please refer to **Exhibit RA10** the relevant extract from the Highway Register.

4. Stoke Road is also part of the C108 classified road route and is represented in yellow on Exhibit RA01. The C108 Stoke Road runs from the junction with Upper Belgrave Road to the junction of Druid Hill and Parrys Lane. As Stoke Road was in existence before 1835 and a principal route it would have been automatically adopted under the 1835 Highways Act.

5. Bristol City Council is the Highway Authority and as such responsible for the maintenance of the Will Lane. Wills Lane is partially adopted for a length of 66 metres from Saville Road to Downs Cottage. Please refer to **Exhibit RA11**, a plan showing the extent of the adopted highway for Wills Lane.

6. Wills Lane is located on land owned by Bristol City Council's Parks Department. Please see **Exhibit RA12** showing BCC Property ID 4966.

7. Our Highway Register (list of streets maintainable at the public expense) does not provide a date of adoption for Wills Lane. Wills Lane was formerly maintained as part of Saville Road. This part of Saville Road was renamed Wills Lane in 2008 for addressing purposes. Please refer to **Exhibit RA13**, the Street Naming & Numbering Team's notes explaining the reason for the renaming.

Statement of Truth

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

26/02/2026

X 

Robert Archer
Highways Technical Officer
Signed by: BRLSRAA

Signed..... Dated.....

On behalf of: Claimant
Witness: R Archer
Witness Statement: 2nd
Exhibit: RA10

CLAIM NUMBER: M00BS959

THE COUNTY COURT AT BRISTOL

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

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

Defendant

EXHIBIT RA10

THIS IS EXHIBIT RA10 REFERRED TO IN THE STATEMENT OF ROBERT ARCHER

608 CE/7 P&S

	Name of Highway	District	O.S. 1/2500	Section on Highway Plan	Approx. length yards KM	Date of Adoption	Disposal Vol.	Disposal No.	Remarks Date of Boundary Extension Cross References Declaration as New Street, etc.
1	Stoke Hill X	Stoke Bishop			1·10·				Complete. Downleaze to Druid Hill Diversion at bottom on West side R.W. 7.4.1926 (Widened R.W. 1924) Containing Stoke Cottages and Lopen Cottages.
	Stoke Lane	Stapleton			0·34.				Reduced to about 150yds when bound ones extended 1935. Off Frenchay Park Road
	Stoke Lane X	Westbury			1·20				Westbury Village to Parrys Lane Complete. Widened R.W. 1924
	Stoke Road X	Durdham Down			0·83.				Complete. York St. to Downleaze Widened R.W. 1920
2	Stoke Paddock Road	Stoke Bishop			~~·27~~ 0·24	3.9.1931			Complete. From Shirehampton Road to Cheyne Road.
					3·71 Total				

On behalf of: Claimant
Witness: R Archer
Witness Statement: 2nd
Exhibit: RA11

CLAIM NUMBER: M00BS959

THE COUNTY COURT AT BRISTOL

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

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

Defendant

EXHIBIT RA11

THIS IS EXHIBIT RA11 REFERRED TO IN THE STATEMENT OF ROBERT ARCHER

Wills Lane Adopted Highway



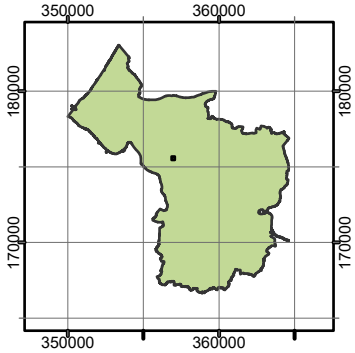
10 5 0 10 20 30 40
m

1:1,250

Legend

Adopted highways
Adopted, Confirmed
Unclassified

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© Get Mapping Plc and Bluesky International Limited [2026]



Date: 05/02/2026

On behalf of: Claimant
Witness: R Archer
Witness Statement: 2nd
Exhibit: RA12

CLAIM NUMBER: M00BS959

THE COUNTY COURT AT BRISTOL

BETWEEN

BRISTOL CITY COUNCIL

Claimant

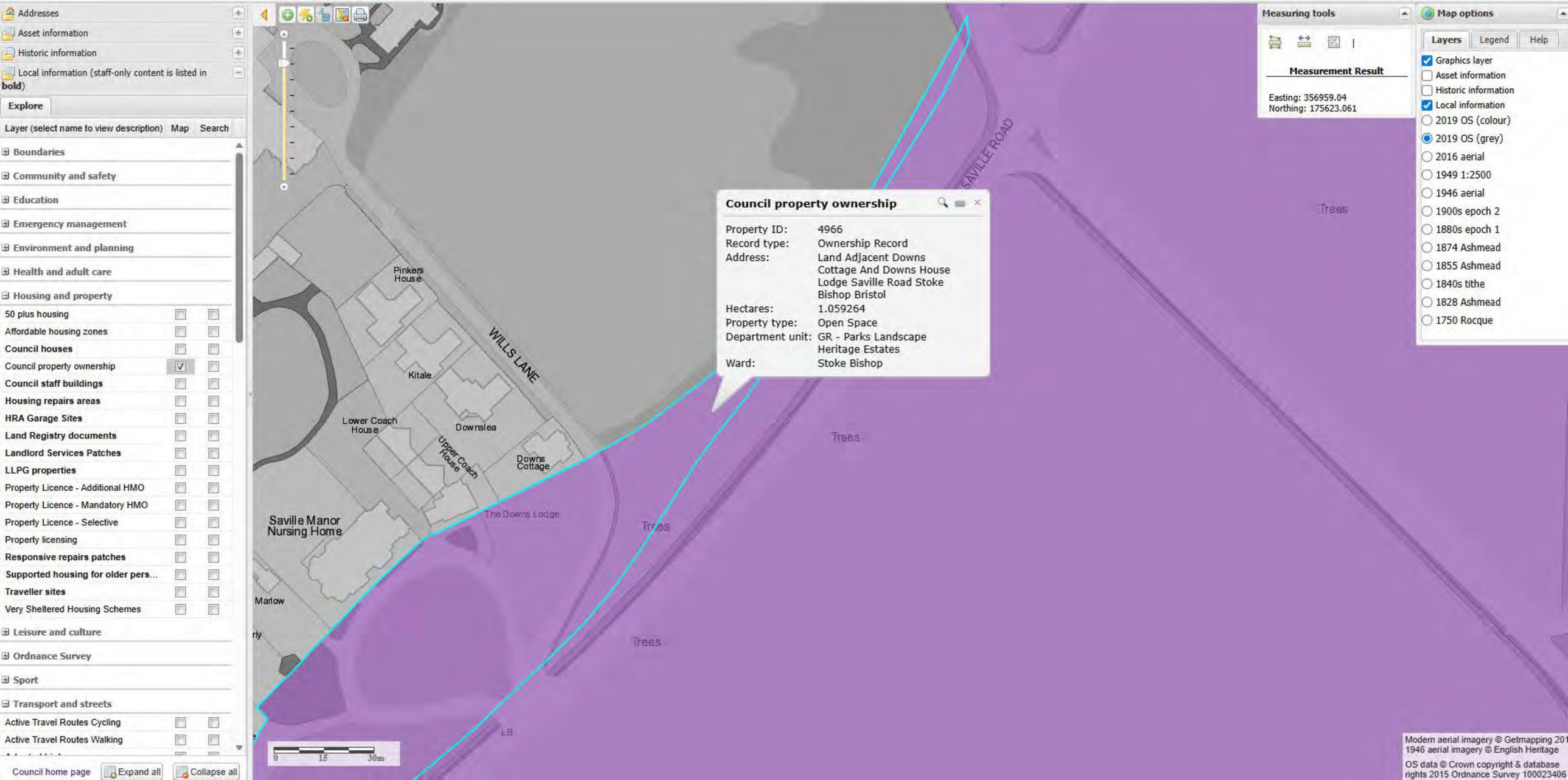
and

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

Defendant

EXHIBIT RA12

THIS IS EXHIBIT RA12 REFERRED TO IN THE STATEMENT OF ROBERT ARCHER


Addresses
Asset information
Historic information
Local information (staff-only content is listed in bold)
Explore
Layer (select name to view description)
Map
Search
Boundaries
Community and safety
Education
Emergency management
Environment and planning
Health and adult care
Housing and property
50 plus housing
Affordable housing zones
Council houses
Council property ownership
Council staff buildings
Housing repairs areas
HRA Garage Sites
Land Registry documents
Landlord Services Patches
LLPG properties
Property Licence - Additional HMO
Property Licence - Mandatory HMO
Property Licence - Selective
Property licensing
Responsive repairs patches
Supported housing for older pers...
Traveller sites
Very Sheltered Housing Schemes
Leisure and culture
Ordnance Survey
Sport
Transport and streets
Active Travel Routes Cycling
Active Travel Routes Walking
Council home page
Expand all
Collapse all
Council property ownership
Property ID: 4966
Record type: Ownership Record
Address: Land Adjacent Downs Cottage And Downs House Lodge Saville Road Stoke Bishop Bristol
Hectares: 1.059264
Property type: Open Space
Department unit: GR - Parks Landscape Heritage Estates
Ward: Stoke Bishop
Measuring tools
Measurement Result
Easting: 356959.04
Northing: 175623.061
Map options
Layers
Legend
Help
Graphics layer
Asset information
Historic information
Local information
2019 OS (colour)
2019 OS (grey)
2016 aerial
1949 1:2500
1946 aerial
1900s epoch 2
1880s epoch 1
1874 Ashmead
1855 Ashmead
1840s tithe
1828 Ashmead
1750 Rocque
SAVILLE ROAD
WILLS LANE
Pinkers House
Kitale
Lower Coach House
Downslea
Upper Coach House
Downs Cottage
The Downs Lodge
Saville Manor Nursing Home
Marlow
Trees
0
15
30m
Modern aerial imagery © Getmapping 201
1946 aerial imagery © English Heritage
OS data © Crown copyright & database rights 2015 Ordnance Survey 100023406

On behalf of: Claimant
Witness: R Archer
Witness Statement: 2nd
Exhibit: RA13

CLAIM NUMBER: M00BS959

THE COUNTY COURT AT BRISTOL

BETWEEN

BRISTOL CITY COUNCIL

Claimant

and

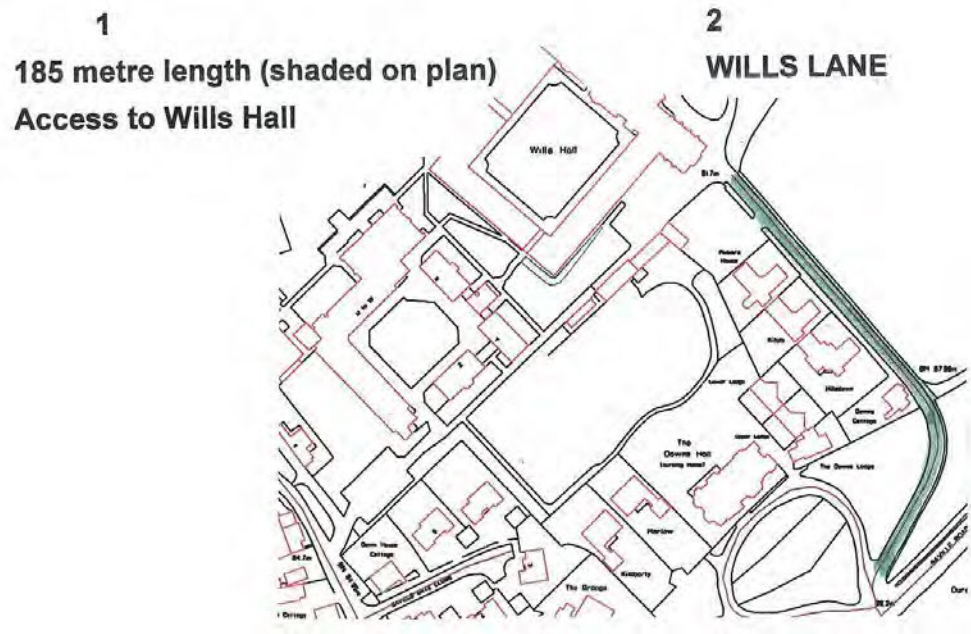
PERSONS UNKNOWN
ON DURDHAM DOWN, CLIFTON DOWN AND
LADIES MILE RESIDING IN
TENTS, CARAVANS OR OTHER VEHICLES
ADAPTED FOR RESIDENTIAL PURPOSES

Defendant

EXHIBIT RA13

THIS IS EXHIBIT RA13 REFERRED TO IN THE STATEMENT OF ROBERT ARCHER

WILLS LANE



The following existing properties, formerly addresses on Saville Road, BS9 1JA, are now on the newly named Wills Lane, BS9 1FH.

Downs Cottage
Downslea
Kitale
Pinkers House

The access road to the properties was held on our records as Access to Wills Hall.