

Claim Number:

BUSINESS AND PROPERTY COURTS IN MANCHESTER

B E T W E E N

(1) ABSENCE PROTECTION LIMITED

(2) AGM PRODUCTS LIMITED

(3) ALPHABOND TECHNOLOGIES LIMITED

and

OTHERS

Claimants

and

PERSONS UNKNOWN

Defendant

**WITNESS STATEMENT OF HUGH
SHIELDS**

I, Hugh Shields, will state as follows:

1. I am employed by Groundwork Cheshire, Lancashire, Merseyside which is a private company limited by guarantee without share capital and a registered charity (charity registration number 514727) ('Groundwork').
2. I give this statement in support of this application for a *quia timet* injunction to prevent unlawful Trespass and upon Gadbrook Park, Northwich, Cheshire ('the Park') by Persons Unknown which

is causing nuisance, annoyance and financial loss to the lawful occupiers of the same. I am authorised by the businesses on the Park who are named as the Claimants of the subject proceedings ('the Claimants') to provide this statement on their behalf.

3. 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.

Groundwork

4. Groundwork has been appointed by Gadbrook Park Business Improvement District ('Gadbrook BID') to manage its activities to maintain and improve the amenity of Gadbrook Park.
5. I am part of Groundwork's Business Improvement Districts Team and am the Estate Manager at Gadbrook Park.
6. I also fulfil a similar role with the Winsford 1-5 Business Improvement District at Winsford Industrial Estate in Cheshire.

Gadbrook Park

7. The Park is a business park of approximately 100 acres set in grounds on the edge of Northwich in Cheshire. It has a single entrance and is accessed from the A556 dual carriageway.
8. The Park was developed in 1984 and now hosts approximately 70 businesses which employ approximately 5,000 people.
9. Most of the premises on the Park are used as office accommodation. There are also research and development, finance, distribution and production businesses and a café.
10. I regularly liaise with the Claimants as part of my role with Groundwork. I confirm that all of the named Claimants are parties with a right to immediate occupation of their respective premises. Each Claimants is either a freeholder, leaseholder with a lease registered at Land Registry or the tenant pursuant to an unregistered lease of less than seven years of premises.

Gadbrook BID

11. The Park formed a business improvement district following a majority vote by its business rates payers. A levy is charged on all business rate payers on the Park in addition to their business rates bill. This levy is used to develop projects which will benefit businesses in the local area.
12. A key theme of Gadbrook BID is to ensure a safe and secure working environment for the ratepayers as well as for the staff and visitors who attend the Park each day.

Unauthorised Trespass

13. Since February 2020, there have been at least sixteen unauthorised Trespasses upon the Park by the various members of the gypsy and traveller community ('Persons Unknown').
14. I have set out the details of each of the known unauthorised Trespasses at Annexes A to G of my statement.
15. In addition, I have obtained a spreadsheet kept by Cheshire West and Chester Council which records each unauthorised Trespass onto the Park. This spreadsheet is exhibited as Annex H and contains details on the identity of some of the Persons Unknown together with some of the vehicle registration numbers.
16. I have spoken with the affected businesses and understand that none of them provided any invitation for Persons Unknown to set carry out the Trespasses. Furthermore, I understand from the Claimants that none of the Persons Unknown attended any meetings or appointments with any of the businesses on the Park. I am unaware of any lawful reason or excuse for Persons Unknown to have set up camps on the Park and to stay during the day and overnight.
17. Unfortunately, Persons Unknown have regularly returned to the Park and moved onto other car parks to set up more of the Trespasses. The Claimants are concerned that this issue will get worse unless an injunction is granted to restrain future trespasses.

Financial Losses

18. I understand that separate witness statements will be provided on behalf of some of the Claimants to evidence the specific financial losses faced by them as a result of the Trespasses.

19. I have set out to the best of my knowledge the losses incurred by the Claimants as a result of each Trespass. This information forms part of Annex A.

Safety of Lawful Occupiers and Visitors

20. I am advised by various leaseholders that they are gradually re-opening their premises as coronavirus lockdown restrictions are eased. As such, I am advised by member of Gadbrook BID that the number of employees returning to work at the Park has increased in recent weeks and is expected to further increase in the weeks and months to come.
21. Gadbrook BID considers it important as a matter of public health that social distancing is maintained on the Park.
22. Regrettably, the unpredictable nature of the Trespasses means that car parks are unlawfully occupied by Persons Unknown at short notice and often overnight which is anticipated to cause significant disruption should insufficient socially distanced car parking spaces be available at the Claimants' premises.
23. Therefore, whilst the Claimants' application arises out of previous and anticipated future Trespass, there are also health and safety concerns which arise out of the conduct of Persons Unknown. The Claimants are therefore concerned to ensure the safety of their employees and visitors.

The Present Application

24. At the time of giving this statement, I am not aware of any Persons Unknown occupying the Park or that any Trespasses are currently taking place. The most recent Trespass on the Park commenced on 26 April 2021 and lasted for 4 days.
25. The purpose of this application is to request that the Honourable Court grants a *quia timet* injunction to prevent unlawful Trespass upon the Park on the grounds that it is likely that Persons Unknown will continue to commit the Trespass by moving from car park to car park on the Park thereby continuing to cause nuisance, annoyance and financial loss to freeholders and leaseholders

Statement of Truth

I understand that the purpose of this witness statement is to set out matters of fact of which I have personal knowledge.

I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case.

This witness statement sets out only my personal knowledge and recollection, in my own words.

On points that I understand to be important in the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, if so how and when.

I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge.

Signed: Hugh Shields

Name: Hugh Shields

Position: Estate Manager

Dated: 26/07/2021


Certificate of Compliance

I hereby certify that:

1. I am the relevant legal representative within the meaning of Practice Direction 57AC.
2. I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to ~~[name of witness]~~.

HUGH SHIELDS

3. I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.

Signed: 
Name: ALEXANDER SANDLAND
Position: PARTNER
Dated: 26/08/21

Butcher & Barlow LLP
Solicitors & Notaries
3 Royal Mews
Gadbrook Park
Northwich Cheshire CW9 7UD

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Claimants

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PERSONS UNKNOWN

Defendant

**'ANNEX A' TO THE WITNESS
STATEMENT OF HUGH SHIELDS**

Date the Trespass began	29/01/20
Date the Trespass ended	10/02/20
How was access to Gadbrook Business Park gained?	The travellers entered the park via the main road (A556). They then proceeded to enter individual car parks of businesses. Some of them gained entry by crossing over embankments and grass verges purposely evading bollards at the front entrance.
What areas of Gadbrook Business Park were occupied?	Targeting House Rudheath Way Arabica Cafe Meridian House Royal Mews
What was the structure of the encampment?	Throughout the encampment there were 4 caravans and 5 cars. The travellers first set up on Targeting House and Arabica Café car parks before moving on to Rudheath Way, Meridian House and Royal Mews.
Were the travellers using any of the claimant/ business park facilities?	The encampment on Targeting House took the opportunity to hook up to one of the business' water supply.
What particular nuisance(s) were they causing?	As a result of the incursions, a number of issues have been reported to the BID, including: <ul style="list-style-type: none"> • Anti-social behaviour • Dogs running loose, including on the public highway • Dog biting staff member • Human excrement deposits • Theft of water • Fly tipping and waste deposits • Staff intimidation • Blocking access to electrical substation • Preventing access to car parks
Were there animals? Were there any incidences of the animals causing a nuisance?	When the encampment arrived on the Park they did have dogs which they allowed to roam free; we had a report from one of the businesses that they had a visitor nipped by one of the dogs as they were going to their office. Staff raised concerns that the dogs were roaming about the park unsupervised and that the felt their staff and clients felt threatened by them. One of the businesses dialled 101 about the dogs twice during the encampment. The PCSO, the Gypsy Liaison Officer and the Dog Warden made a visit to the travellers to address some of the issues.
What were your interactions with the travellers?	There was no interaction with the encampment at all, as this was on the advice of the police and the local council. All incursions were reported to the local police and the local council. The local council would send out a Gypsy Liaison Officer to do a welfare

	check on the travellers, the local PCSO would also make a visit to the business park.
Did the travellers leave any damage behind?	Although there was no damage as such due to the added security presence, the biggest issue was the amount of fly tipping, human excrement deposits and baby nappies left behind.
What (if any) remedial work was required to restore the site to its normal state?	<ul style="list-style-type: none"> • Time in dealing with the process (this was hardest felt when it involves small businesses – who make up the largest proportion of residents on the park.) • Security costs (physical barriers, and security officers) • Solicitor’s costs • Court fees • Bailiff charges • Clean up costs • Additional security costs to prevent further incursions (this is particularly difficult to arrange where there are areas of shared occupation involved. As an example, if a car park is associated with a multi-occupancy building, individual parking spaces are often leased to the businesses. This becomes much more difficult to secure the car park as a whole from further incursions as liability for costs would rest with multiple businesses). <p>None of these remedies prevents the same travellers returning to the land once they have left.</p>
What costs were incurred in doing so?	<p>The above remedies incurred additional costs for businesses.</p> <p>The following is a list of the costs incurred by one business in relation to the travellers’ occupation of Targeting House:</p> <ul style="list-style-type: none"> • Fees to remove travellers (incurred approx. January / February 2020 - £550.00 + VAT • Security patrols to ensure the travellers could not regain entry to the car park whilst they remained at Gadbrook Park - £1,432.00 + VAT • Litter pick and waste removal - £107.50 + VAT • Isolation of outside tap to prevent unlawful use of water - £110.90 + VAT <p>In addition:</p> <ul style="list-style-type: none"> • Fifield Glyn paid £ 1,683 + VAT remove the travellers from Gadbrook Mews. • The BID spent approx. £5,500 on increased security for when the encampment arrives • Timberwise spent £3,000 on security • Howard Worth have had to spend an extra £6,000 on security

<p>Any other information of relevance in relation to the trespass?</p>	<p>One of the bigger business used some of their additional security resources during the evening time for mobile patrols, especially during hours of darkness; the staff were taken from another site.</p> <p>Staff from Inview (Targeting House) Park felt they had to move their cars form the car park where there was an encampment, as they felt threatened. Staff on the park also complained that the travellers were constantly following people around when going to their offices and making people feel uncomfortable. Staff who did not feel intimidated also had issues not being able to park their cars due to the encampments taking over the car parks.</p> <p>The owners of Targeting House have had to turn their water off; in addition to that, they brought in a security officer with a guard dog to put on the site. They also have had to have a barrier gate fitted to prevent further intrusions.</p>
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Claimants

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PERSONS UNKNOWN

Defendant

**'ANNEX B' TO THE WITNESS
STATEMENT OF HUGH SHIELDS**

Date the Trespass began	01/06/20
Date the Trespass ended	05/06/20
How was access to Gadbrook Business Park gained?	The travellers entered the park via the main road (A556) they then proceed to enter individual car parks of businesses, some of them gained entry by crossing over embankments and grass verges purposely evading bollards at the front entrance.
What areas of Gadbrook Business Park were occupied?	Meridian House Kingsmead House Targeting House
What was the structure of the encampment?	The encampment set up site on the car park of Meridian House; bailiffs then removed them late that evening. The same encampment turned up again on Thursday and set up on Kingsmead House, bailiffs removed them late afternoon only to move onto Targeting House. On this encampment, there were 2 caravans and 2 cars.
Were the travellers using any of the claimant/ business park facilities?	All of the caravans and cars occupied the car parks that belong to the businesses.
What particular nuisance(s) were they causing?	As a result of the incursions, a number of issues have been reported to the BID, including: <ul style="list-style-type: none"> • Anti-social behaviour • Dogs running loose, including on the public highway • Human excrement deposits • Fly tipping and waste deposits • Staff intimidation • Preventing access to car parks
Were there animals? Were there any incidences of the animals causing a nuisance?	The travellers arrived on the park with dogs, which they allowed to roam unsupervised. This was an issue for staff on the park as they did have concerns that the dogs were roaming around and felt threatened by them. The dogs were also a concern for the traffic on the park.
What were your interactions with the travellers?	There were no interactions with encampments, as this was on the advice of the police and the local council. All incursions were reported to the local police and the local council who would then send out a Liaison Officer to do a welfare check on the travellers, the local PCSO or Police would also make a visit to the park.
Did the travellers leave any damage behind?	We could not see any damage. We believe this was due to the increased security presence that the BID and the businesses put in place. The biggest issue was the amount of fly tipping and human excrement deposits left behind.

<p>What (if any) remedial work was required to restore the site to its normal state?</p>	<ul style="list-style-type: none"> • Time in dealing with the process (this is felt hardest when it involved the smaller businesses – who make up the largest proportion of residents on the park.) • Solicitor's costs • Court fees • Bailiff charges • Physical security measures • Security patrols • Additional security costs to prevent further incursions (this is particularly difficult to arrange where there are areas of shared occupation involved. As an example, if a car park is associated with a multi-occupancy building, individual parking spaces are leased to the businesses. This becomes much more difficult to secure the car park as a whole from further incursions as liability for costs would rest with multiple businesses).
<p>What costs were incurred in doing so?</p>	<p>The above remedies incurred additional costs for businesses.</p> <p>The following is a list of the costs incurred by one business in relation to the travellers' trespass:</p> <p>The Hut Group</p> <ul style="list-style-type: none"> • Installing Bollards - £2,500 • Security patrols to ensure the travellers could not regain entry whilst trespassing at Gadbrook Park - £1,560 • Bailiff fees to remove travellers 5/6th June 2020 – £1,190
<p>Any other information of relevance in relation to the trespass?</p>	<p>Staff on the park felt intimidated whilst walking around the park. Staff also had issues not being able to park their cars due to the encampments taking over the car parks.</p> <p>I had dealings with the PSCOs who visited the travellers following complaints from the businesses.</p>

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PERSONS UNKNOWN

Defendant

**'ANNEX C' TO THE WITNESS
STATEMENT OF HUGH SHIELDS**

Date the Trespass began	09/06/20
Date the Trespass ended	11/06/20
How was access to Gadbrook Business Park gained?	The travellers entered the park via the main road (A556) they then proceed to enter individual car parks of businesses on the park, some of them gained entry by crossing over embankments and grass verges purposely evading bollards at the front entrance.
What area of Gadbrook Business Park was occupied?	Arabica Café Meridian House Europark Royal Court Royal Mews
What was the structure of the encampment?	The encampment consisted of three cars and caravans, which set up on the car park at Arabica Café on 09/06/2020. An additional two cars and caravans set up behind Meridian House. The following evening, the encampment moved from Arabica Café car park to Europark and the caravans on Meridian House moved to the car park at Royal Court. The travellers continued to move around the car parks before eventually settling on the car parks of Brunel Court and Royal Mews where they were served with a notice to vacate.
Were the travellers using any of the claimant/ business park facilities?	All of the caravans and cars occupied the car parks that belong to the businesses.
What particular nuisance(s) were they causing?	As a result of the incursions, a number of issues have been reported to the BID, including: <ul style="list-style-type: none"> • Anti-social behaviour • Dogs running loose, including on the public highway • Human excrement deposits • Fly tipping and waste deposits • Staff intimidation • Preventing access to car parks
Were there animals? Were there any incidences of the animals causing a nuisance?	When the travellers arrived on the park they did have dogs which they allowed to roam free; Staff did have concerns that the dogs were roaming about and felt threatened by them.
What were your interactions with the travellers?	There were no interactions with encampments, as this was on the advice of the police and the local council. All incursions were reported to the local police and the local council who would then send out a Liaison Officer to do a welfare check on the travellers, the local PCSO or Police would also make a visit to the park.
Did the travellers leave any damage behind?	Although there was no lasting damage due to the added security presence, the biggest issue was the amount of fly tipping and

	human excrement left behind along with discarded items left strewn all over the car parks.
What (if any) remedial work was required to restore the site to its normal state?	<ul style="list-style-type: none"> • Time in dealing with the process (this is felt hardest when it involves small businesses – who make up the largest proportion of residents on the park.) • Solicitors costs • Court fees • Bailiff charges • Clean up costs • Additional security costs to prevent further incursions (this is particularly difficult to arrange where there are areas of shared occupation involved. As an example, if a car park is associated with a multi-occupancy building, individual parking spaces are often leased to the businesses. This becomes much more difficult to secure the car park as a whole from further incursions as liability for costs would rest with multiple businesses).
What costs were incurred in doing so?	<p>The above remedies incurred additional costs for businesses.</p> <p>One business incurred the following costs in relation to this trespass:</p> <ul style="list-style-type: none"> • Fees to remove travellers - £1,485
Any other information of relevance in relation to the trespass?	Staff did feel intimidated and had issues not being able to park their cars due to the encampments taking over the car parks.

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Defendant

**'ANNEX D' TO THE WITNESS
STATEMENT OF HUGH SHIELDS**

Date the Trespass began	15/10/20
Date the Trespass ended	18/10/20
How was access to Gadbrook Business Park gained?	The travellers entered the park via the main road (A556) they then proceed to enter individual car parks of businesses, some of them gained entry by crossing over embankments and grass verges purposely evading bollards at the front entrance.
What areas of Gadbrook Business Park were occupied?	Meridian House Kingsmead House (Grass Verge) Targeting House Royal Court Woodlands court
What was the structure of the encampment?	<ul style="list-style-type: none"> • Two caravans turned up at Royal Court. • One caravan set up on Meridian House • One caravan set up on Targeting House <p>The caravans were unhitched and then the vehicles left the site.</p> <ul style="list-style-type: none"> • One additional caravan set upon the verge of Kingsmead <p>Two caravans were evicted off Royal Court they then moved to Woodlands Court car park, in the process evading bollards and driving across the grass verge.</p> <p>On this encampment, there were a total of 5 caravans and 5 cars.</p>
Were the travellers using any of the claimant/ business park facilities?	All of the encampment caravans and cars were using the car parks that belong to the businesses.
What particular nuisance(s) were they causing?	As a result of the incursions, a number of issues have been reported to the BID, including: <ul style="list-style-type: none"> • Anti-social behaviour • Dogs running loose, including on the public highway • Human excrement deposits • Fly tipping and waste deposits • Preventing access to car parks
Were there animals? Were there any incidences of the animals causing a nuisance?	When the travellers arrived on the park they did have dogs and were allowed to roam free. This became an issue for staff on the park as they did have concerns that the dogs were roaming around unsupervised and felt threatened, also the dogs were a concern for the traffic on the park.
What were your interactions with the travellers?	There were no interactions with encampments, as this was on the advice of the police and the local council. All incursions were reported to the local police and the local council who would then

	send out a Liaison Officer to do a welfare check on the travellers, the local PCSO or Police would also make a visit to the park.
Did the travellers leave any damage behind?	We could not see any damage. We believe this was due to the increased security presence that the BID and the businesses put in place. The biggest issue was the amount of fly tipping and human excrement deposits left behind.
What (if any) remedial work was required to restore the site to its normal state	<ul style="list-style-type: none"> • Time in dealing with the process (this is felt hardest when it involved the smaller businesses – who make up the largest proportion of residents on the park.) • Solicitors costs • Court fees • Bailiff charges • Increased security
What costs were incurred in doing so?	<p>The above remedies incurred additional costs for businesses.</p> <p>The following is a list of the costs incurred by businesses in relation to the travellers' trespass:</p> <ul style="list-style-type: none"> • Two caravans evicted on 15/10/20 at a cost of £1,700 • Civil Enforcement Agents attended The Hut Group and these caravans were removed by Enforcement Agents. These caravans then returned to Royal Court at a further cost of £1,100 to The Hut Group • Cost of securing the site with concrete baulks - £401 hire per week and a further £401 to facilitate the removal of the baulks • Installation of gate to prevent further unauthorised access - £1,450.00 + VAT • Further extra guarding deployed by The Hut Group security. <p>In total, this encampment cost around The Hut Group alone £4,600. This was mainly incurred in relation to the evictions and manned security.</p> <p>The BID incurred additional security costs as a result of this trespass.</p>
Any other information of relevance in relation to the trespass?	<p>Staff on the Park felt intimidated whilst walking round the park. Staff also had issues not being able to park their cars due to the encampments taking over the car parks.</p> <p>Every time there is an encampment the BID contacts the local Police, PCSO and the Welfare Liaison Officer for the Council.</p>

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Defendant

**'ANNEX E' TO THE WITNESS
STATEMENT OF HUGH SHIELDS**

Date the Trespass began	04/02/21
Date the Trespass ended	07/02/21
How was access to Gadbrook Business Park gained?	The travellers entered the park via the main road (A556) they then proceed to enter individual car parks of businesses.
What areas of Gadbrook Business Park were occupied?	Arabica Café Ingenico Premises
What was the structure of the encampment?	This encampment consisted of five caravan and five cars. Three caravans set up on Arabica Café car park but left a few hours later. Two caravans then set up on the Ingenico premises for the weekend.
Were the travellers using any of the claimant/ business park facilities?	All of the caravans and cars were using the carparks that belong to the businesses.
What particular nuisance(s) were they causing?	As a result of the incursions, a number of issues have been reported to the BID, including: <ul style="list-style-type: none"> • Anti-social behaviour • Dogs running loose, including on the public highway • Human excrement deposits • Fly tipping and waste deposits • Staff intimidation • Preventing access to car parks
Were there animals? Were there any incidences of the animals causing a nuisance?	When the travellers arrived on the park they did have dogs, which they allowed to roam free; there were concerns that the dogs were roaming unsupervised and a threat to staff and traffic.
What were your interactions with the travellers?	There were no interactions with encampments, as this was on the advice of the police and the local council. All incursions were reported to the local police and the local council who would then send out a Liaison Officer to do a welfare check on the travellers, the local PCSO or Police would also make a visit to the park.
Did the travellers leave any damage behind?	Although there was no damage as such due to the added security presence, the biggest issue was the amount of fly tipping and human excrement deposits left behind.
What (if any) remedial work was required to restore the site to its normal state	<ul style="list-style-type: none"> • Time in dealing with the process (this is felt hardest when it involves small businesses – who make up the largest proportion of residents on the park.) • Solicitors costs

	<ul style="list-style-type: none"> • Court fees • Bailiff charges • Clean up costs • Additional security costs to prevent further incursions (this is particularly difficult to arrange where there are areas of shared occupation involved. As an example, if a car park is associated with a multi-occupancy building, individual parking spaces are often leased to the businesses. This becomes much more difficult to secure the car park as a whole from further incursions as liability for costs would rest with multiple businesses).
<p>What costs were incurred in doing so?</p>	<p>There were no direct cost to the businesses as a result of this trespass.</p>
<p>Any other information of relevance in relation to the trespass?</p>	<p>No</p>

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**'ANNEX F' TO THE WITNESS
STATEMENT OF HUGH SHIELDS**

Date the Trespass began	03/03/21
Date the Trespass ended	03/03/21
How was access to Gadbrook Business Park gained?	The travellers entered the park via the main road (A556) they then proceed to enter individual car parks of businesses.
What areas of Gadbrook Business Park were occupied?	Ingenico Premises
What was the structure of the encampment?	This encampment consisted of two caravan and two cars who set up on the Ingenico Premises and left later that day.
Were the travellers using any of the claimant/ business park facilities?	All of the caravans and cars were using the carparks that belong to the businesses.
What particular nuisance(s) were they causing?	As a result of the incursions, a number of issues have been reported to the BID, including: <ul style="list-style-type: none"> • Anti-social behaviour • Fly tipping and waste deposits • Preventing access to car parks
Were there animals? Were there any incidences of the animals causing a nuisance?	There were no report of any dogs.
What were your interactions with the travellers?	I did not interact with them at all, as this was on the advice of the police and the local council. All incursions were reported to the local police and the local council who would then send out a liaison officer to do a welfare check on the travellers, the local PCSO would also make a visit to the park.
Did the travellers leave any damage behind?	No
What (if any) remedial work was required to restore the site to its normal state	
What costs were incurred in doing so?	There were no direct cost to the businesses on this intrusion.
Any other information of relevance in relation to the trespass?	No

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**'ANNEX G' TO THE WITNESS
STATEMENT OF HUGH SHIELDS**

Date the Trespass began	26/04/2021
Date the Trespass ended	29/04/2021
How was access to Gadbrook Business Park gained?	The travellers entered the park via the main road (A556) they then proceed to enter the car park by passing the security chain at the entrance by driving over the grass verge.
What areas of Gadbrook Business Park were occupied?	Warren House
What was the structure of the encampment?	This encampment consisted of 5 caravans and 5 cars
Were the travellers using any of the claimant/ business park facilities?	All of the caravans and cars were using the carparks that belong to the businesses.
What particular nuisance(s) were they causing?	As a result of the incursions, a number of issues have been reported to the BID, including: <ul style="list-style-type: none"> • Rubbish strewn and clothes hanging to dry all over the benches/ shrubbery/ trees and signs. • Damage to two of the premises security card readers. • Complaint from one of the businesses of a male being abusive to one of the females and a child. • Anti-social behaviour • Fly tipping and waste deposits • Staff intimidation • Preventing access to car parks
Were there animals? Were there any incidences of the animals causing a nuisance?	No
What were your interactions with the travellers?	The person in charge of the security of the premises and I spoke to one of the travellers, he informed us that they would not be moving for a few days as all the other males were at a family event in Liverpool. I met up with the police on the Friday that the travellers arrived, police spoke to the travellers but there was no action taken. All incursions are reported to the local police and the local council. The local PCSQ would also make visits to the park.
Did the travellers leave any damage behind?	The travellers caused damage to two of the premises' security card readers.

	
<p>What (if any) remedial work was required to restore the site to its normal state</p>	<ul style="list-style-type: none"> • Time in dealing with the process • Solicitors costs • Court fees • Bailiff charges • Clean up costs
<p>What costs were incurred in doing so?</p>	<p>To be confirmed - I am yet to receive confirmation of the final costs incurred by the businesses</p>
<p>Any other information of relevance in relation to the trespass?</p>	 <p>Rubbish left behind by travellers</p>

BUSINESS AND PROPERTY COURTS IN MANCHESTER

B E T W E E N

(1) ABSENCE PROTECTION LIMITED

(2) AGM PRODUCTS LIMITED

(3) ALPHABOND TECHNOLOGIES LIMITED

and

OTHERS

Claimants

and

PERSONS UNKNOWN

Defendant

**'ANNEX H' TO THE WITNESS
STATEMENT OF HUGH SHIELDS**
