

Name of Court	IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION
Claim No.	
Fee account no. (if applicable)	PBA0087727
Help with Fees - Ref no. (if applicable)	□□□ - □□□ - □□□
Warrant No (if applicable)	
Claimant's Name (including reference)	WYCOMBE DISTRICT COUNCIL
Defendant's Name (including reference)	(1) PERSONS UNKNOWN OCCUPYING LAND (2) PERSONS UNKNOWN DEPOSITING WASTE OR FLY-TIPPING ON LAND
Date	02 August 2019

1. What is your name, or if you are a solicitor, the name of your firm

<b>LEGAL SERVICES, WYCOMBE DISTRICT COUNCIL</b>
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2. Are you a  Claimant  Defendant  Legal Representative

Other (please specify)

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If you are a solicitor who do you represent

<b>The Claimant</b>
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3. What order are you asking the Court to make and why

<p>The Defendant as Persons Unknown Occupying Land and / or Depositing Waste or Fly-tipping on Land are forbidden from:</p> <p>(1) Setting-up an encampment on any Land identified on the attached Maps on the 101 sites listed on the Schedule, without written permission from the Local Planning Authority by virtue of Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015/596 (GPDO 2015) or planning permission granted by a planning inspector;</p> <p>(2) Occupying any part of the Land for residential purposes (temporary or otherwise) on the 101 sites listed on the Schedules and identified on the attached Maps including with caravans, mobile homes, vehicles, and residential paraphernalia without written permission from the Local Planning Authority by virtue of Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015/596 (GPDO 2015) or planning permission granted by a planning inspector;</p> <p>(3) Bringing on to the Land on the 101 sites listed on the Schedule and identified on the attached Maps, any vehicle whether for the purposes of disposal of waste and materials or otherwise, other than when driving through the District of Wycombe or in compliance with the Parking Orders regulating the use of car parks or with written</p>
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permission from the Local Planning Authority by virtue of Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015/596 (GPD0 2015) express permission from the owners of the Land.

(4) Depositing any personal, domestic or commercial waste and / or fly-tipping on any of the 101 sites listed on the Schedules and identified on the attached Maps.

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

5. How do you want this application dealt with  at a hearing  without a hearing  
 at a telephone hearing

6. How long do you think the hearing will last **1** hour  minutes  
Is this time estimate agreed by all the parties  Yes  No

7. Give details of any fixed trial date or period

N/A

8. What level of judge does your hearing need

Judge

9. Who should be served with this application

Without Notice

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

N/A

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

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

If necessary please continue on a separate sheet

**Statement of Truth**

(I believe) (the Applicant believes) that the facts stated in this section (and any continuation sheets) are true

Signed *K. Khanna* Dated 1/8/19  
Applicant(s Solicitor)(’s Litigation Friend)

Full Name KIRAN KHANNA

Name of Applicant’s Solicitor’s Firm Legal Services Wycombe District Council

Position or office held Principal Solicitor  
(if signing on behalf of the company)

11. Signature and address details

Signed *K. Khanna* Dated 1st August 2019  
Applicant(s Solicitor) (’s Litigation Friend)

Position or office held Principal Solicitor  
(if signing on behalf of the company)

Applicant’s address to which documents about this application should be sent

<b>LEGAL SERVICES, WYCOMBE DISTRICT COUNCIL, QUEEN VICTORIA ROAD, HIGH WYCOMBE, BUCKINGHAMSHIRE,</b>	if applicable		
	Tel No.	01494-421264	
	Fax No.	none	
	DX No.	4411 High Wycombe -	
Postcode	HP11 1BB	Ref:	AT/006131

E-mail address : [kiran.khanna@wycombe.gov.uk](mailto:kiran.khanna@wycombe.gov.uk)

Schedule of Properties

No	Asset Type	Name of Building/Green Space	Street/ Arite	Post Town	Post Code
1	Car Park	Council Offices Car Park	Queen Victoria Road	High Wycombe	HP11 1BB
2	Car Park	Wakeman Road Car Park	Wakeman Road	Bourne End	SL8 5SX
3	Car Park	Finings Road Car Park	Finings Road	Lane End	HP14 3JR
4	Car Park	Beaumont Way Car Park	Beaumont Way	Hazlemere	HP15 7BD
5	Car Park	Wycombe Swan MSCP	St Mary Street	High Wycombe	HP11 2HF
6	Car Park	Easton Street MSCP	Easton Street	High Wycombe	HP11 1NU
7	Car Park	Hilltop Community Centre/Badminton Centre Car Park	Crest Road	High Wycombe	HP11 1UA
8	Car Park	Baker Street Car Park	Baker Street	High Wycombe	HP11 2RX
9	Car Park	Marlow Central Car Park	Riley Road	Marlow	SL7 2NL
10	Car Park	Riley Road Car Park	Riley Road	Marlow	SL7 2NB
11	Car Park	Dean Street Car Park	Dean Street	Marlow	SL7 3AB
12	Car Park	Desborough Road Car Park	Desborough Road	High Wycombe	HP11 2QB
13	Car Park	Duke Street Car Park	Duke Street	High Wycombe	HP13 6EE
14	Car Park	George Street Car Park	George Street	High Wycombe	HP11 2RX
15	Car Park	Horns Lane Car Park	Horns Lane	Princes Risborough	SL8 5SX
16	Car Park	Institute Road Car Park	Institute Road	Marlow	SL7 1BN
17	Car Park	Liston Road Car Park	Liston Road	Marlow	SL7 1GA
18	Car Park	East Richardson Street Car Park	East Richardson Street	High Wycombe	HP11 2QA
19	Car Park	Railway Place Car Park	Railway Place	High Wycombe	HP13 6AD
20	Car Park	Station Approach Car Park	Station Approach	Marlow	SL7 1RD
21	Car Park	The Mount Car Park	Stratton Road	Princes Risborough	HP27 9AR
22	Car Park	Totteridge Road Car Park	Totteridge Road	High Wycombe	HP13 6DG
23	Car Park	West Street Car Park	West Street	Marlow	SL7 2BS
24	Car Park	Desborough Street Car Park	Desborough Street	High Wycombe	HP11 2PG
25	Car Park	Red Lion Way Car Park	Red Lion Way	Wooburn Green	HP10 0HT
26	Car Park	Booker Car Park	Clay Lane	Marlow	SL7 3DJ
27	Car Park	TGI Fridays Car Park	Crest Road	High Wycombe	HP11 1UA
28	Car Park	Lincoln Park Business Centre	Lincoln Road	High Wycombe	HP12 3RD
29	Car Park	Coachway and Park and Ride	Handy Cross	High Wycombe	HP11 1UP
30	Car Park	Desbox Car Park	East Richardson Street	High Wycombe	HP11 2GG
31	Car Park	Quaker Burial Ground	Railway Place	High Wycombe	HP13 6AD
32	Development Land	Handy Cross Land	Handy Cross	High Wycombe	HP11 1UP
33	Development Land	Bellfield Road Development Site	Bellfield Road	High Wycombe	HP13 5LG
34	Development Land	Ashwells Field	Cock Lane	Tylers Green	HP10 8DT
35	Development Land	Cressex Island	Crest Road	Cressex	HP11 1HA
36	Development Land	32 Bridge Street	Bridge Street	High Wycombe	HP11 2EL
37	Development Land	Mendy Street	Mendy Street	High Wycombe	HP11 2EL
38	Development Land	Abbey Barn North	Abbey Barn Lane	High Wycombe	HP11 1RE
39	Development Land	Former Bassetsbury Lane Allotments	Bassetsbury Lane	High Wycombe	HP11 1GY
40	Green Space	Totteridge Common	Totteridge Lane	High Wycombe	HP13 7QG
41	Green Space	Desborough Castle	Rutland Avenue	High Wycombe	HP12 3DB
42	Green Space	Plomer Hill Green Space	Plomer Hill	High Wycombe	HP13 5NQ
43	Green Space	Queensway Amenity Land	Queensway	Hazlemere	HP15 7HR
44	Green Space	Rennie Close Green Space	Rennie Close	Downley	HP13 5TB
45	Green Space	The Ropenies (Play Area)	Deeds Grove	High Wycombe	HP12 3HF
46	Green Space	School Close Park	School Close	Downley	HP13 5TR
47	Green Space	Thanstead Copse Green Space	Thanstead Copse	Loudwater	HP10 9YH

48	Green Space	Kingsmead Road/Mallard Place Green Space	Kingsmead Road	High Wycombe	HP11 1JS
49	Green Space	Terrfers Green	Amersham Road	High Wycombe	HP13 5AJ
50	Green Space	Arnison Avenue Green Space	Arnison Avenue	High Wycombe	HP213 6BP
51	Green Space	Brands Hill Avenue Green Space	Brands Hill Avenue	High Wycombe	HP13 5PX
52	Green Space	Carver Hill Road Green Space	Carver Hill Road	High Wycombe	HP11 2UA
53	Green Space	Fair Ridge / John North Close Green Space	Fair Ridge / John North Close	High Wycombe	HP11 1FF
54	Green Space	Foxleigh Green Space	Foxleigh	High Wycombe	HP11 1PL
55	Green Space	Frogmoor Island	Frogmoor	High Wycombe	HP13 5ES
56	Green Space	George Road Green Space	George Road	Stokenchurch	HP14 3RN
57	Green Space	Handleton Common	Handleton Common	Lane End	HP14 3LA
58	Green Space	Hawksmoor Close Green Space	Hawksmoor Close	Downley	HP13 5SAR
59	Green Space	Hyde Green Green Space	Hyde Green	Marlow	SL7 1QT
60	Green Space	Kings Road Green Space	Kings Road / London Road	High Wycombe	HP11 1RU
61	Green Space	Oak Tree Avenue Green Space	Oak Tree Avenue	Marlow Bottom	SL7 3EJ
62	Green Space	Princes Gate Green Space	Princes Gate	High Wycombe	HP13 7AZ
63	Green Space	Ridgeway Close Green Space	Ridgeway Close	Marlow	SL7 3LJ
64	Green Space	Rookery Gardens Green Space	Rookery Gardens	Marlow	SL7 3AN
65	Green Space	Selwood Way Green Space	Selwood Way	Downley	HP13 5XR
66	Green Space	Slade Road Green Space	Slade Road	Stokenchurch	HP14 3TY
67	Green Space	The Brackens Green Space	The Brackens	High Wycombe	HP11 1EB
68	Green Space	The Spinney Green Space	The Spinney	High Wycombe	HP11 1FQ
69	Green Space	Tom Burts Hill Green Space	Tom Burts Hill	High Wycombe	HP11 2UT
70	Green Space	Warren Wood Drive Green Space	Warren Wood Drive	High Wycombe	HP11 1DZ
71	Green Space	Wellington Road Green Space	Wellington Road	High Wycombe	HP12 3PR
72	Green Space	Wheeler End Common Green Space	Wheeler End Common	Wheeler End	HP14 3NE
73	Green Space	Willowmead Square Green Space	Willowmead Square	Marlow	SL7 1HP
74	Green Space	Windsor Crescent Green Space	Windsor Crescent	Loudwater	HP10 9TU
75	Green Space	Wren Vale Green Space / Play Area	Wren Vale	Downley	HP13 5AR
76	Green Space	Baring Road Open Space	Baring Road	High Wycombe	HP13 7SH
77	Green Space	Slate Meadow Green Space	Stratford Drive	Wooburn Green	HP10 0QQ
78	Green Space	The Old Sewage Works	Fords Clos J	Bledlow Ridge	HP14 4AP
79	Green Space	Foresters Field	Water End	Stokenchurch	HP14 3XQ
80	Recreation Ground	Gossmore Recreation Ground and Car Park	Gossmore Lane	Marlow	SL7 1QQ
81	Recreation Ground	Kingsmead Recreation Ground and Car Park	Kingsmead Road	High Wycombe	HP11 1HQ
82	Recreation Ground	Booker Recreation Ground and Car Park	Barry Close	High Wycombe	HP12 4SY
83	Recreation Ground	Higginson Park and Car Park	Pound Lane	Marlow	SL7 2AE
84	Recreation Ground	Totteridge Recreation Ground and Car Park	Walton Drive	High Wycombe	HP13 7PQ
85	Recreation Ground	The Rye Recreation Ground and Car Park	The Rye	High Wycombe	HP11 1QX
86	Recreation Ground	Shelley Recreation Ground and Car Park	Shelley Road	High Wycombe	HP11 2UW
87	Recreation Ground	Hughenden Park and Car Park	Hughenden Road	High Wycombe	HP14 4LA
88	Recreation Ground	Hazlemere Recreation Ground and Car Park	Amersham Road	Hazlemere	HP15 7QW
89	Recreation Ground	Holmers Farm Recreation Ground Car Park	Buckmaster Road	Holmers Farm	HP12 4PD
90	Recreation Ground	Desborough Recreation Ground Car Park	Fryers Lane	High Wycombe	HP12 3GH
91	Recreation Ground	Riverswood Recreation Ground	Riverswood Drive	Marlow	SL7 1QG
92	Recreation Ground	Marsh Green Open Space	Keephill Road	High Wycombe	HP11 1QZ
93	Recreation Ground	Ellery Rise Playing Field	Ellery Rise	Frieth	RG9 6PH
94	Recreation Ground	Holtspur Avenue Playground	Holtspur Avenue	Wooburn Green	HP10 0BJ
95	Recreation Ground	Sappersfield	Klin Road	Wooburn Green	SL8 5JJ
96	Recreation Ground	Watery Lane Recreation Ground	Watery Lane	Wooburn Green	HP10 0NG
97	Service Road	Swan Service Road	St Mary Street	High Wycombe	HP11 2AG

98  
99  
100  
101

Service Road  
Woodland  
Woodland  
Woodland

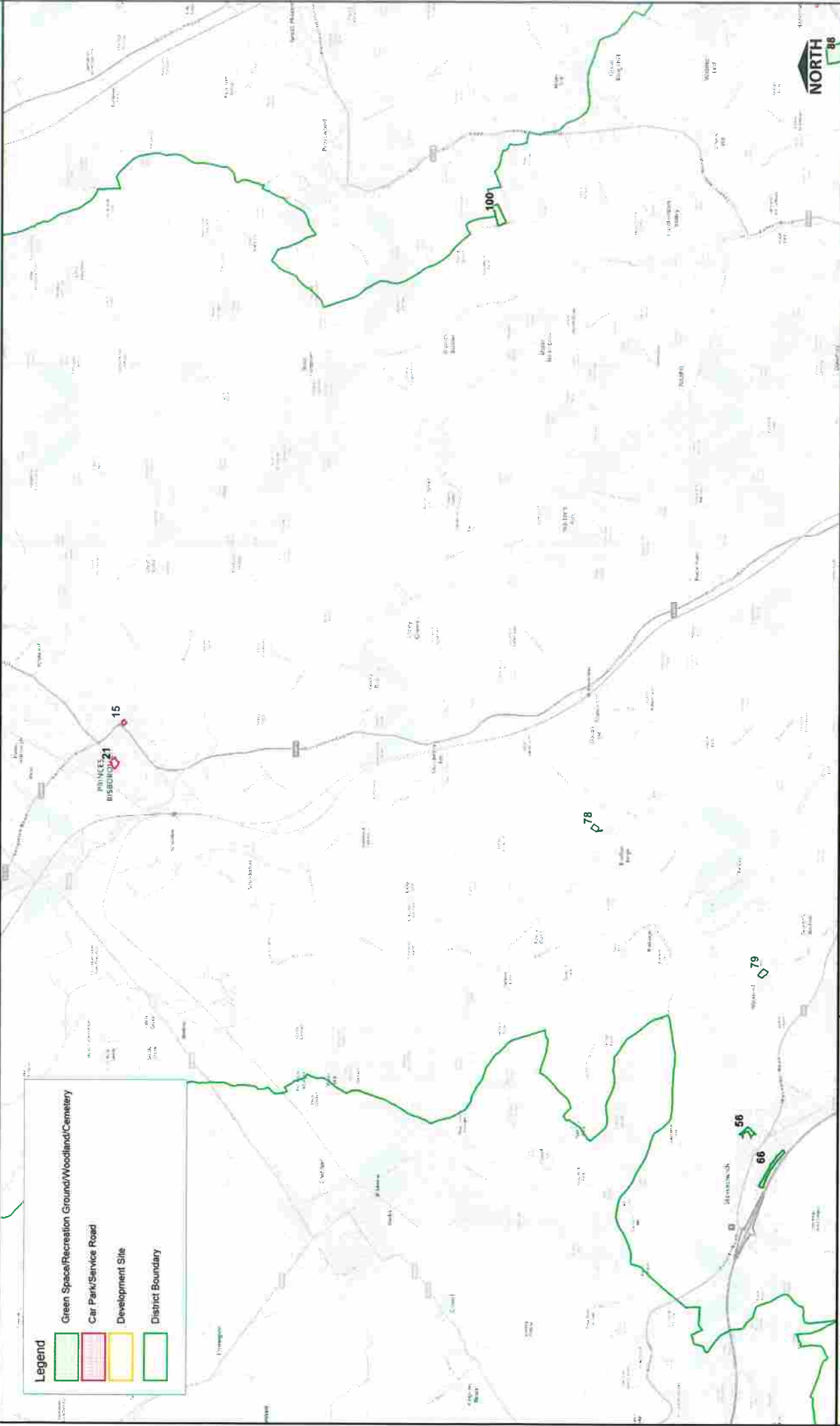
Service Road 1A Fieldhouse Lane  
Tomburts Hill  
Picnic Area/Prestwood LNR  
Lords Wood Marlow Common

Fieldhouse Lane  
Wordsworth Road  
Hampden Road  
Marlow Common Road

Marlow  
High Wycombe  
Prestwood  
Marlow

SL7 1LR  
HP11 2JP  
HP16 0JD  
SL7 2QP

**Sites at Risk of Unauthorised Encampment - Princes Risborough, Stokenchurch and Naphill**



**Legend**

- Green Space/Recreation Ground/Woodland/Cemetery
- Car Park/Service Road
- Development Site
- District Boundary

**Statement of Purpose:**  
 Site Plan for Council Business Use Only

**Map produced in MapInfo GIS by:**  
 GIS Team

**Saved as Layout in Workspace Path / Name:**

**Scale:** 1:40000

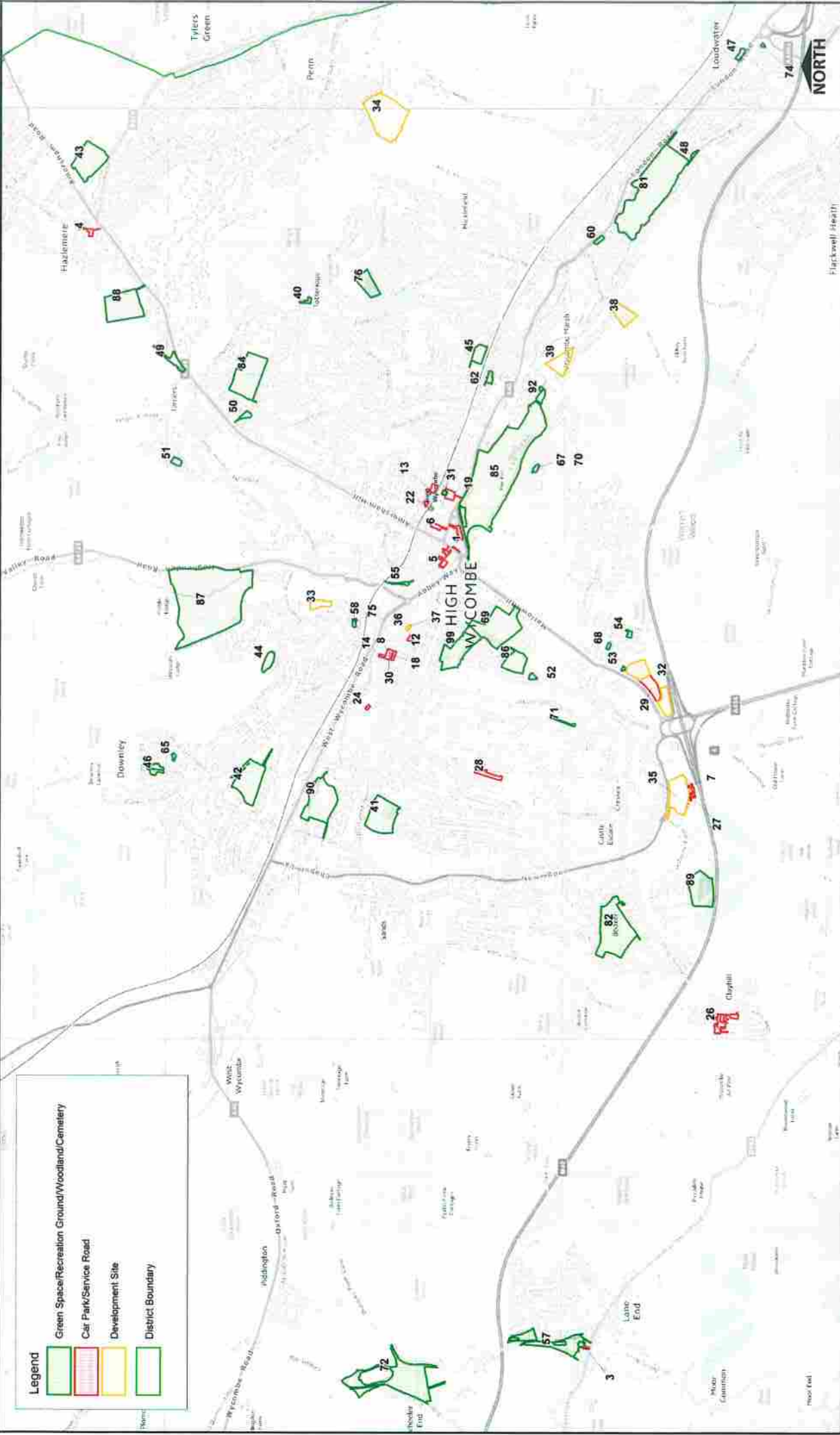
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Sites at Risk of Unauthorised Encampment - High Wycombe area



**Statement of Purpose:**  
 Site Plan for Council Business Use Only

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<b>Saved as Layout in Workspace Path / Name:</b>		

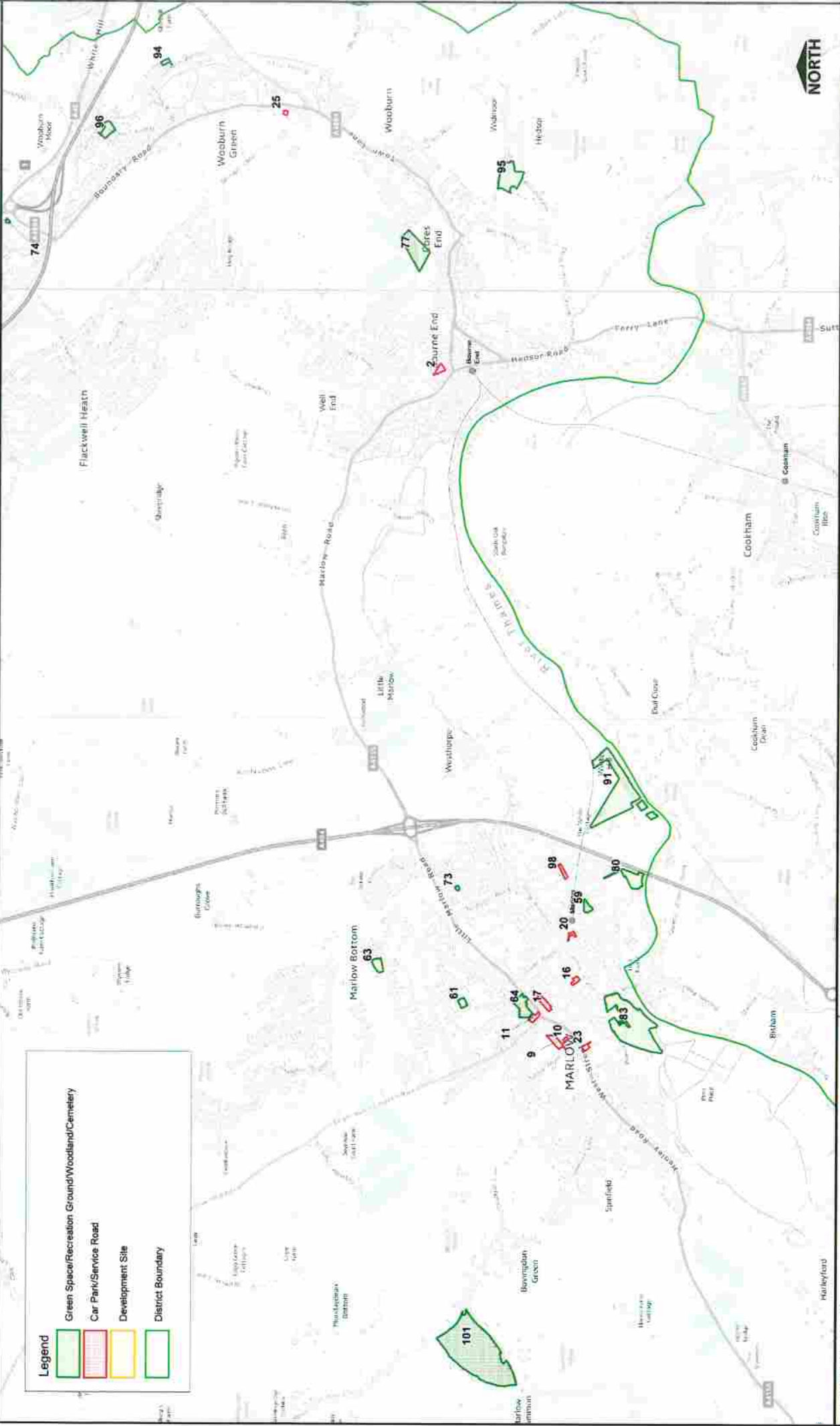
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**Sites at Risk of Unauthorised Encampment - Marlow, Bourne End and Wooburn Green**



**Legend**

- Green Space/Recreation Ground/Woodland/Cemetery
- Car Park/Service Road
- Development Site
- District Boundary

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