

CLAIM NO:

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

BETWEEN:

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

-and-

(1) PERSONS UNKNOWN BRINGING CARAVANS/MOBILE HOMES ON TO THE LAND
KNOWN AS CATTLE MARKET CAR PARK, STATION STREET, ATHERSTONE,
WARWICKSHIRE, CV9 1DD ("THE LAND") TO LIVE IN, OR UNDERTAKING DEVELOPMENT
(INCLUDING RESIDENTIAL OCCUPATION) AS DEFINED BY SECTION 55 OF THE TOWN
AND COUNTRY PLANNING ACT 1990 ON THE LAND

Defendants

WITNESS STATEMENT OF

Ryan Lee-Wilkes, Principal Planning Enforcement Officer at North Warwickshire Borough Council, The Council House, South Street, Atherstone, CV9 1DE **WILL SAY AS FOLLOWS:**

1. I, Ryan Lee-Wilkes am the Principal Planning Enforcement Officer at North Warwickshire Borough Council, the claimant in this claim. I'm an associate member of the Royal Town Planning Institute (RTPI) and have been employed as Principal Planning Enforcement Officer at the Borough Council since October 2022. I have worked within the local government planning sector since 2009 and specifically in an enforcement role since 2016.
2. The facts in this statement come from my personal knowledge and evidence obtained from the reading of documents relating to activity at the same location. I believe that the facts stated in this witness statement are true.

NOTIFICATION OF UNAUTHORISED OCCUPATION OF THE LAND

3. The claimant received notification from members of the public that a several caravans and other vehicles had arrived and parked on the Cattle Market Public Car Park accessed of Station Street Atherstone. It was alleged that the group are likely to be from the traveller community.
4. Referring to Mrs Gallagher statement (paragraph 4) a site visit was completed to confirm the allegations received. She confirmed that eight caravans and six additional vehicles were present at the time of the visit. Information was given as to the unauthorised nature of the vehicles and that it was Council land.
5. In accordance with Mrs Gallaghers statement the parties who are currently residing on the land have no authorisation to do so and do not have the benefit of planning permission. Furthermore, they have been given reasonable opportunity to vacate the land and have chosen not to do so.
6. Therefore, a breach of planning control has taken place. The land has been a public car park for many years and the siting of caravans and associated vehicles used for residential purposes triggers the need for planning permission as a material change of use of land as defined with section 55 of the Town and Country Planning Act 1990 as amended.

WHY AN INJUNCTION IS NEEDED

7. Given that the occupation of the land has taken place at short notice by persons unknown and that the continued unauthorised development could lead to further unauthorised occupation, an injunction is required against the current parties residing on the land and any future parties which are and will remain unknown to the authority.
8. The only planning power to apprehend any further potential breaches of planning control is with the use of an Injunction in accordance with Section 187B (Injunction restraining breaches of planning control) of the Town & Country Planning Act 1990, as amended. Which states that a where a local planning authority consider it expedient, they may apply to the court for an injunction whether or not any they have exercised

or are proposing to exercise any other powers under the Act. This includes injunctions to be issued against a person whose identify is unknown.

PERSONS UNKNOWN

9. I have previously been informed that there is a 6-fold legal test which was articulated in *Ineos Upstream Ltd V Persons Unknown* [2019] EWCA Civ 515 when the Court comes to decide when the injunction ought to apply against unnamed defendants. I shall now address each of these 6 points, in turn:

- a) There is sufficient and imminent risk of a tortious act being committed such as to justify the application of this '*quia timet*' relief. I remain satisfied that there is a significant risk of further breaches of planning control, if no further action is taken.
- b) It is impossible to identify the perpetrator of the apprehended breaches of planning control unless they were restrained. In particular, the Council has no way of knowing the names of those people who might be tempted to occupy the Land in the future and nor is there any way for the Council to elicit this information. It is a "*known unknown*". Furthermore, given there are currently unknown occupants on the land owned by the claimant, and they have not vacated when they previously suggested they would. It could lead to further caravans arriving at the site the longer they remain.
- c) The likelihood of giving notice of the injunction and the method of doing can be set out on the face of the order. This is achieved through the drafting of the order.

- d) The terms of the injunction are not so wide as to prohibit lawful conduct and refer directly to the apprehended breaches of planning control. I am satisfied that the injunction is tailored to the apprehended breaches and merely restrains unlawful conduct.
- e) The terms of the order are sufficiently clear to allow persons who could be affected by the injunction to know what they cannot do.
- f) There are clear temporal and geographical limits to the injunction as the restraint is limited to a single site and its terms will be fixed for a determinate period of time.

10. Since the above case the Judgment in *Wolverhampton City Council and others v London Gypsies and Travellers and others* [2023] UKSC 47, is relevant to this matter in particular to the Traveller community. The outcome detailed in 238(iv) states that *“In deciding whether to grant a newcomer injunction, the application of those principles in the context of trespass and breach of planning control by Travellers will be likely to require an applicant:*

(a) to demonstrate a compelling need for the protection of civil rights or the enforcement of public law not adequately met by any other remedies (including statutory remedies) available to the applicant.

(b) to build into the application and into the order sought procedural protection for the rights (including Convention rights) of the newcomers affected by the order, sufficient to overcome the potential for injustice arising from the fact that, as against newcomers, the application will necessarily be made without notice to them. Those protections are likely to include advertisement of an intended application so as to alert potentially affected Travellers and bodies which may be

able to represent their interests at the hearing of the application, full provision for liberty to persons affected to apply to vary or discharge the order without having to show a change of circumstances, together with temporal and geographical limits on the scope of the order so as to ensure that it is proportional to the rights and interests sought to be protected.

(c) to comply in full with the disclosure duty which attaches to the making of a without notice application, including bringing to the attention of the court any matter which (after due research) the applicant considers that a newcomer might wish to raise by way of opposition to the making of the order.

(d) to show that it is just and convenient in all the circumstances that the order sought should be made.

If those considerations are adhered to, there is no reason in principle why a newcomer injunction should not be granted.”

11. As suggested, there is higher risk that further unauthorised development by Persons Unknown is likely if more formal action is not taken by the authority. The most effective way to apprehend further unauthorised development is with the use of an Injunction against persons that are unknown to the authority as the current occupiers of the land are.
12. The continued unauthorised development also prevents the use of much of the public car park for its lawful use. Reducing the number of car parking spaces within the Town for the wider public use.
13. This demonstrates that even with the suggestion of the current people residing on the land moving on voluntarily, it is not a realistic remedy to the continued breach of planning control. They have already advised this and have failed to vacate the land.

STATEMENT OF TRUTH

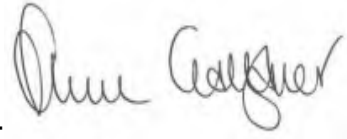
14. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed

A handwritten signature in blue ink, appearing to read 'Hawthorne', is written over a faint, light blue circular stamp.

Dated 25 February 2025

Statement of: Sharon Gallagher



Signed:

Filed:

Exhibits: "SG/1- SG2"

IN THE HIGH COURT IN BIRMINGHAM

CLAIM NO:

KINGS BENCH DIVISION

BETWEEN:

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

- and -

PERSONS UNKNOWN

Defendants

**FIRST WITNESS STATEMENT OF
SHARON GALLAGHER ON BEHALF OF THE CLAIMANT**


I, **SHARON GALLAGHER**, Environmental Health and Licensing Manager at
North Warwickshire Borough Council, Council House, South Street,
Atherstone, CV9 1DE, **WILL SAY AS FOLLOWS:**

1. I am employed by the Claimant in the aforementioned capacity in Environmental Health and Licensing and am authorised to make this statement on its behalf.
2. At approximately 15.00, on the 21 February, I visited the Cattle Market Car Park, Station Street Atherstone CV9 1DB (The Land), in the company of PCSO Simeon Hodson 6098 and PC Matthew Gregory 2189. I noticed Persons Unknown had indeed entered onto the Land.
3. PC Gregory at this point deployed his Body Worn camera. There were nine caravans in total with the following registration plates, DX14 JWM White Caravan, FY13 ZFJ Swift Quattro FB, A073 SNU White Swift Exclusive, VE23 ZTW White Swift, MT14 EPX White Swift Exclusive, VGZ 4360 LMC Exquisite VIP, NU24 LXX Fendt Palace 650, EJ69 HVM Swift Sierra, UIG8943 Swift Quattro FB. I handed S.77 Notices to occupants of 8 of the above vans, MT14 EPX was empty.
4. We spoke to one of the Persons Unknown, I believe this lady was approximately mid thirties with fair hair. We identified ourselves as officers for the Claimant and served her with the Notice SG/1 and site plan SG/2. We then served a further seven Notices at the individual caravans. There were no occupants in one of the caravans.
5. On Saturday 22 February 2025, at approximately 10.30pm, I visited the Land, and noted that the Trespassers were still in occupation of the Land.
6. On 24 February 2025, I visited the Land at approximately 13:00 and noted that the Persons Unknown remained in occupation of the Land.

7. The Claimant has not given any of the Persons Unknown permission to enter upon any part of the Land however they remain in occupation without the licence or consent of the Claimant.
8. I do not believe that the Persons Unknown will vacate the Land unless an Injunction is obtained requiring them to do so.
9. The Claimant, therefore, requests that any Injunction Order covers the whole of the land exhibited as "SG2".

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.

A handwritten signature in black ink, appearing to read 'Dine Galtner', is written over a light grey rectangular background.

Signed

Dated 25/2/2025

Statement of: Sharon Gallagher

Filed:

Exhibits: "SG1 – SG2"

IN THE HIGH COURT IN BIRMINGHAM

CLAIM NO:

KINGS BENCH DIVISION

BETWEEN:

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

- and -

PERSONS UNKNOWN

Defendants

EXHIBIT "SG1"



CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994, Section 77

NOTICE OF DIRECTION TO LEAVE LAND

AND TO REMOVE VEHICLE(S) AND OTHER PROPERTY

TO: The occupants of land at **Former Cattle Market, Station Street, Atherstone** outlined in red on the attached plan

TAKE NOTICE that:

1. IT APPEARS to the **North Warwickshire Borough Council** ("the Council"), being the local authority and the owners of the land hatched black on the attached plan ("the Land"), that you are for the time being residing in a vehicle or vehicles on the Land without permission.
2. In accordance with their powers under Section 77(1) of the Criminal Justice and Public Order Act 1994 and as owners of the Land, the Council HEREBY DIRECT that you and any other persons with you leave the Land and remove the vehicle(s) and any other property which you have on the land no later than **12.00pm on Saturday 22 February 2025**.
3. If you fail to leave the Land and/or remove the vehicle(s) and any other property in accordance with the above Direction or, having removed any such vehicle or property you again enter the Land with a vehicle within the period up to 21 May 2025, you will commit an offence and will be liable on summary conviction to be fined up to £1,000. You will also be liable to action which the Council may decide to take in the County Court such as an Injunction.
4. The Direction operates to require persons who re-enter the land within the said period with vehicles or other property to leave and remove the vehicles or other property as it operates in relation to the persons and vehicles or property on the land when the Direction was originally given.

Dated: 21 February 2025

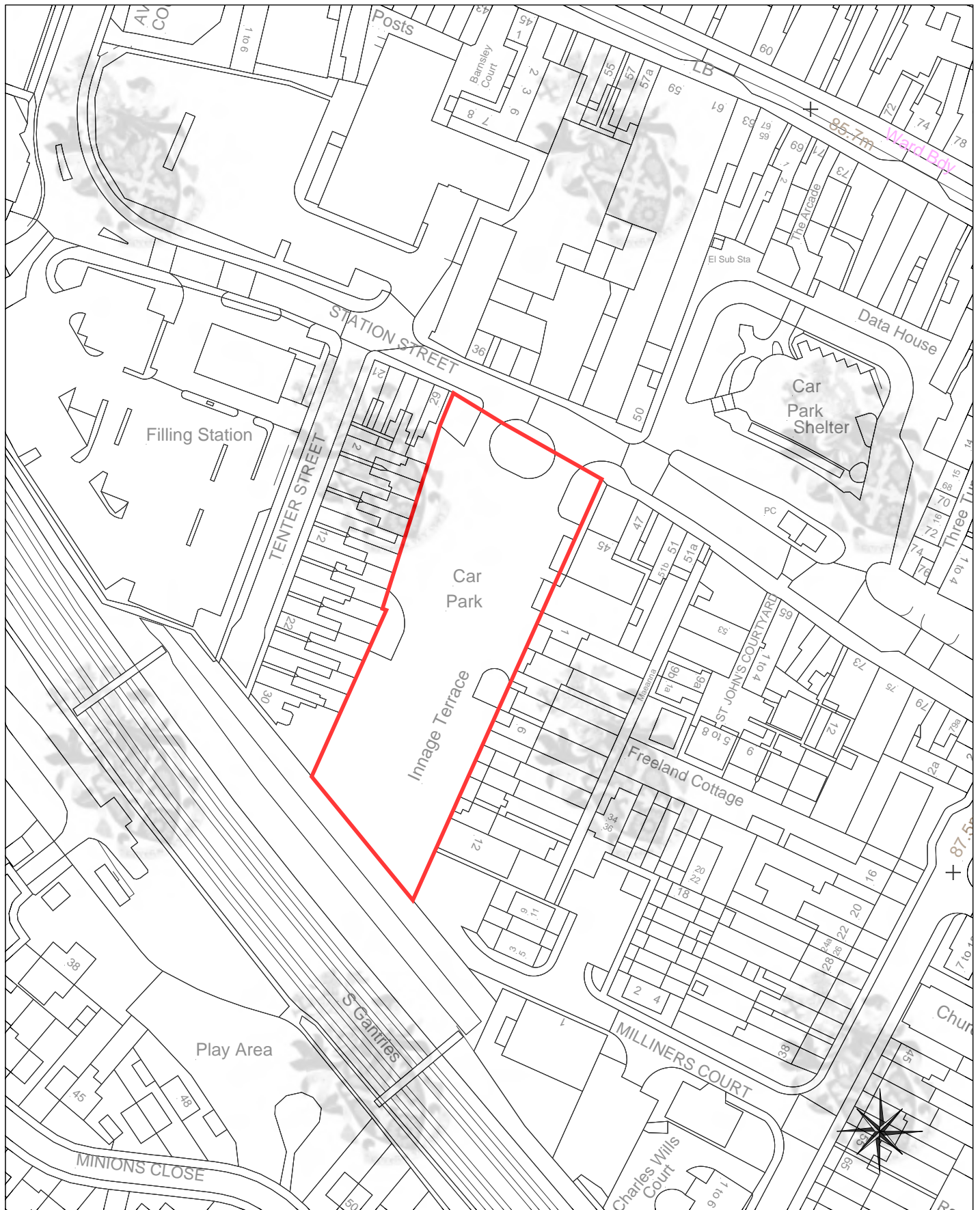
(Signed):.....

.....

Head of Legal Services

* The reference to "vehicle(s)" in the above Notice includes "caravan(s)"

Cattle Market Car Park, Station Street, Atherstone



North Warwickshire Borough Council

The Council House
South Street
Atherstone
CV9 1DE

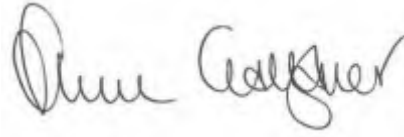


Date: 21 February 2025

Scale: 1:1250

(c) Crown copyright and database rights 2025
Ordnance Survey AC0000823273

Statement of: Sharon Gallagher



Signed:

Filed:

Exhibits: "SG1-SG2"

IN THE HIGH COURT IN BIRMINGHAM

CLAIM NO:

KINGS BENCH DIVISION

BETWEEN:

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

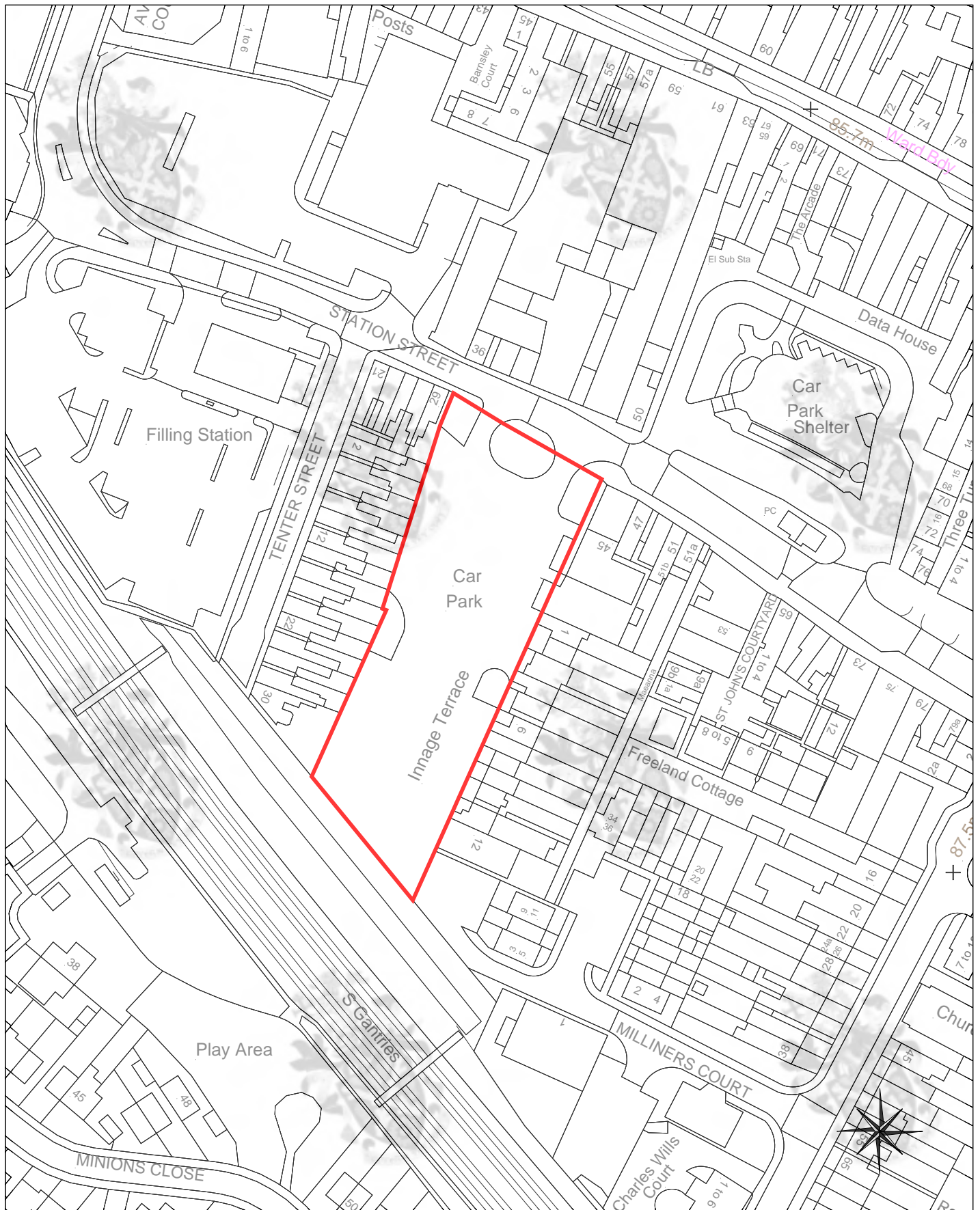
- and -

PERSONS UNKNOWN

Defendants

EXHIBIT "SG2"

Cattle Market Car Park, Station Street, Atherstone



North Warwickshire Borough Council

The Council House
South Street
Atherstone
CV9 1DE



Date: 21 February 2025

Scale: 1:1250

(c) Crown copyright and database rights 2025
Ordnance Survey AC0000823273

Filed on behalf of the Claimant
Ryan Lee-Wilkes
Second Witness Statement
Exhibits RLW01 - RLW04

CLAIM NO: KB-2025-BHM-000038

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

BETWEEN:

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

-and-

(1) PERSONS UNKNOWN BRINGING CARAVANS/MOBILE HOMES ON TO THE LAND
KNOWN AS CATTLE MARKET CAR PARK, STATION STREET, ATHERSTONE,
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(INCLUDING RESIDENTIAL OCCUPATION) AS DEFINED BY SECTION 55 OF THE TOWN
AND COUNTRY PLANNING ACT 1990 ON THE LAND

Defendants

WITNESS STATEMENT OF

Ryan Lee-Wilkes, Principal Planning Enforcement Officer at North Warwickshire Borough Council, The Council House, South Street, Atherstone, CV9 1DE **WILL SAY AS FOLLOWS:**

1. I, Ryan Lee-Wilkes am the Principal Planning Enforcement Officer at North Warwickshire Borough Council, the claimant in this claim. I'm an associate member of the Royal Town Planning Institute (RTPI) and have been employed as Principal Planning Enforcement Officer at the Borough Council since October 2022. I have worked within the local government planning sector since 2009 and specifically in an enforcement role since 2016.
2. The facts in this statement come from my personal knowledge and evidence obtained from the reading of documents relating to activity at the same location, including

evidence provided to me following the vacation of the site from the unauthorised occupants. I believe that the facts stated in this witness statement are true.

FOLLOWING THE SERVICE OF COURT ORDER

3. Further to my statement dated 25 February 2025, the sealed Court Order (KB-2025-BHM-000038 dated 25 February 2025 was served on the unauthorised occupants of the Cattle Market Car Park on the 26th February 2025.
4. It was noted that the occupants left the car park during the evening of the 26 February 2025. I have been advised that the police visited the site in the evening and reported to the Council's Chief Executive that there was a significant amount of waste and that *"the area has been used as a toilet."* This would require urgent remedial action prior to the car park being accessed by the public.
5. During the early hours of 27 February 2025, a significant clean-up operation began by the Council following the waste that was left by the unauthorised occupants including suspected human and animal excrement, carpets, animal crate, discarded clothing, litter and other detritus. Two vehicle sweepers attended to the main car parking area. Photographs were taken by the Streetscape team following the clean-up operation and some images taken from the towns CCTV service. **See exhibit RLW01.**
6. Some of the waste was thrown over the metal fencing onto the railway sidings adjacent the West Coat Mainline. The Council have removed what was in reach and the remaining items requiring access onto railway land has been reported to Network Rail. **See Exhibit RLW02.**

WHY AN INJUNCTION IS NEEDED

7. Atherstone Town Centre has very limited public car parking with the Cattle Market Car Park (Long Stay) being the largest of the public car parks providing 108 spaces. There are four other smaller car parks, Memorial Hall (67), Sheepy Road (56), Station Street (20) and Woolpack Way (54) providing a further 197 between them. At weekends only, a further 120 spaces are available with the Council House opening their staff parking areas for public use.

8. The Memorial Hall car park is mainly used by visitors to Atherstone Leisure Centre, Library and Atherstone Clinic (NHS) which are accessed from the car park and its entrance road. This is a short stay car park (4 hours no return within 2 hours) to maintain adequate provision throughout the day for these visitors.
9. Given that the Cattle Market car park is designated as Long Stay it also provides further car parking provision for rail commuters with it being a short walk (approximately 380m) from the Train Station. The station itself only has a small car park with just 17 spaces available. **See Exhibit RLW03.**
10. The impact to the public use of the car park can be evidenced with the figures from the car parking ticket machines and “RingGo” parking app shown below. There are no figures for Sundays as its free parking. For reference the unauthorised occupants arrived in the evening of the 20th February and vacated on the evening of the 26th of February as highlighted below.

Day	Friday	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday
Date	07/02/25	08/02/25	09/02/25	10/02/25	11/02/25	12/02/25	13/02/25
Visitors	261	87	x	235	243	227	245

Day	Friday	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday
Date	14/02/25	15/02/25	16/02/25	17/02/25	18/02/25	19/02/25	20/02/25
Visitors	266	87	x	225	215	248	326

Day	Friday	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday
Date	21/02/25	22/02/25	23/02/25	24/02/25	25/02/25	26/02/25	27/02/25
Visitors	203	49	x	133	129	204	151

Day	Friday	Saturday	Sunday
Date	28/02/25	01/03/25	02/03/25
Visitors	255	70	x

11. The above figures show a drop in public use of the car park when the unauthorised occupants were on the land compared to the previous week's figures. Then the usage increased again as of the 28th February, when it was more widely known by the public that the unauthorised occupants had vacated the site.

12. The Council have previously considered the installation of a height restriction barrier to prevent such unauthorised occupation. However, on balance it is not a feasible option given the access rights to private properties via the car park.
13. Cattle Market Car Park is bordered by residential properties located on Tenter Street and Innage Terrace. With the car park itself providing the main access to all twelve properties on Innage Terrace, and access to Station Street Surgery **See Exhibit RLW04.**
14. As pictured in RLW04 the residential properties bins are accessed from the car park and the refuse lorry enters the car park to empty these bins. A height barrier would then need to be opened each time the refuse lorry needed to enter the car park. Arguably this is in the Council's control as they provide the waste collection service. However, is it just one example, its also known to the authority that larger vehicles frequently enter the car park to make deliveries to the properties including the Station Street surgery. These vehicles movements are outside of the Councils control so a height barrier cannot be installed as would impact on the lawful access of the private properties in Innage Terrace.
15. The Council needs to act to prevent this unauthorised development from happening again in the future. Ensuring that visitors and commuters have access to adequate parking facilities and that residents and patients at Station Street Surgery are not hindered when accessing their properties and NHS services. Specifically in relation to the patients accessing the Surgery, many will have protected characteristics themselves, particularly regarding age and disability. With the disabled parking provision located immediately outside the surgery as evidenced in exhibit RLW04.
16. As stated in my first witness statement the Council cannot predicted whom may choose to unlawfully occupy the car park at any given time. Therefore, the injunction must continue to account for persons unknown to the planning authority. Although there may be some civil powers acting as landowner, if this breach of planning control were to occur in the future there is no other realistic planning enforcement powers that the Council could use to remedy the breach. With the serving of an enforcement notice, in accordance with section 172(2a) of the Town & Country Planning Act 1990, a notice

shall be served “*on the owner **and** occupier of the land to which it relates*”. Therefore, requiring the Council to comply with the notice to remedy the breach. This would seem a futile exercise and not an effective use of the Council’s public resource.

17. A permanent injunction on the Cattle Market Car Park will help protect the land from future unauthorised development by persons unknown. This will help maintain is lawful use providing parking facilities to the wider public and maintain lawful access to number of residential and commercial properties accessed directly from the car park.

STATEMENT OF TRUTH

18. 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

A handwritten signature in blue ink, appearing to read 'Hawthorne', is written over a faint, light blue circular stamp.

Dated: 6 March 2025

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

Claim No: KB-2025-BHM-000038

Filed on behalf of the Claimant
Ryan Lee-Wilkes
Second Witness Statement
Exhibit RLW01

BETWEEN

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

and

(1) PERSONS UNKNOWN BRINGING CARAVANS/MOBILE HOMES ON TO THE LAND
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WARWICKSHIRE, CV9 1DD ("THE LAND") TO LIVE IN, OR UNDERTAKING DEVELOPMENT
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AND COUNTRY PLANNING ACT 1990 ON THE LAND

Defendants

This is the exhibit RLW01 referred to in the second witness statement of Ryan Lee-Wilkes

Signed:

A handwritten signature in blue ink, appearing to read 'Ryan Lee-Wilkes', is written over a light blue circular stamp.

Dated: 6 March 2025

RLW01

26-02-2025 17:42:38

Cam 14

RLW01

26-02-2025 17:42:49

Cam 14

RLW01



26-02-2025 17:59:39

Cam 14

RLW01

26-02-2025 18:00:44

Cam 14







RLW01 - Street Scape Pictures





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

Claim No: KB-2025-BHM-000038

Filed on behalf of the Claimant
Ryan Lee-Wilkes
Second Witness Statement
Exhibit RLW02

BETWEEN

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

and

(1) PERSONS UNKNOWN BRINGING CARAVANS/MOBILE HOMES ON TO THE LAND
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Defendants

This is the exhibit RLW02 referred to in the second witness statement of Ryan Lee-Wilkes

Signed:

A handwritten signature in blue ink, appearing to read 'Ryan Lee-Wilkes', is written over a light blue circular stamp.

Dated: 6 March 2025





RLW02 - Network Rail Land



From: [Network Rail](#)
To: [REDACTED]
Subject: Network Rail case: 250303-000356
Sent: 03/03/2025 13:58:39

Caution: Warning external email



Response

Thanks for getting in touch! Your information has been received and has been logged in our system.

Your unique reference number is: 250303-000356

If you would like to report something else then please [click here](#).

We will keep you updated by email but if you need to contact us in the meantime, please call our national helpline on 03457 11 41 41 and quote the above reference number.

Subject

Fly-tipping on Network Rail land Atherstone, Warwickshire

Auto-Response By (Administrator) (03/03/2025 01:58 PM)

Thanks for getting in touch! Your information has been received and has been logged in our system.

Your unique reference number is: 250303-000356

If you would like to report something else then please [click here](#).

We will keep you updated by email but if you need to contact us in the meantime, please call our national helpline on 03457 11 41 41 and quote the above reference number.

Customer By CSS Web [REDACTED] (03/03/2025 01:58 PM)

Travellers had stayed on Cattle Market Car Park, Atherstone, Warwickshire. CV9

During their stay they fly-tipped carpets, chairs, discarded food tins and drink cans on to adjacent Network Rail land.

What 3 words location:

///spout.saved.eyelid

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

Claim No: KB-2025-BHM-000038

Filed on behalf of the Claimant
Ryan Lee-Wilkes
Second Witness Statement
Exhibit RLW03

BETWEEN

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

and

(1) PERSONS UNKNOWN BRINGING CARAVANS/MOBILE HOMES ON TO THE LAND
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Defendants

This is the exhibit RLW03 referred to in the second witness statement of Ryan Lee-Wilkes

Signed:

A handwritten signature in blue ink, appearing to read 'Ryan Lee-Wilkes', is written over a light blue circular stamp.

Dated: 6 March 2025

Atherstone Train Station

[Home](#) > [Stations](#) > Atherstone

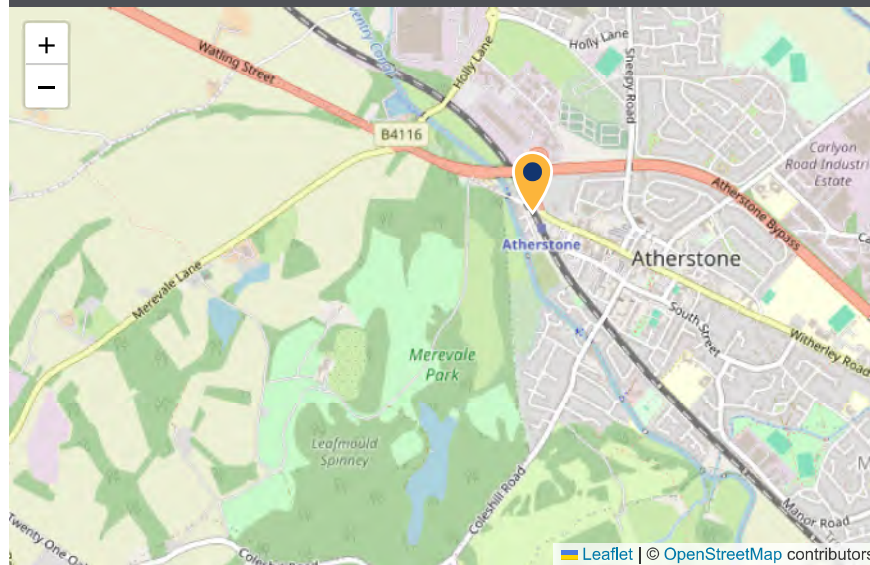
Atherstone at a glance

Address:

Atherstone station
Long Street
Atherstone
Warwickshire
CV9 1BH


Ticket office:

×





- ✓ Prepurchase collection
- ✓ Car park


- ✓ Taxi-rank
- ✓ Seated area available

	<p>information on the step-free classification system can be found at https://www.orr.gov.uk/media/10955 </p> <p>The Assistance meeting point is on the platform that your service is due to depart. Please attract the attention of the Conductor who will assist you onto the train.</p>
Ticket gates	No
Impaired mobility set down available	Both the forecourt area and the other entrance may be used for parking and pick-up.

Car parking

Car park 1	Station Car Park
Car park 1 operator	SABA UK
Car park 1 spaces	17
Car park 1 charges	<ul style="list-style-type: none"> • Off-peak: £2.50 • Daily: £3.50 • Weekly: £13.30 • Monthly: £38.00 • Annual: £305.10
Car park 1 contact details	<p>0330 123 5247 </p> <p>https://www.nationalrail.co.uk/ </p>

Bus connections

Onward travel	Information to plan your onward journey is available in a printable format here 
----------------------	---

Dep.	Destination	Origin	Operator	Load	Plat.	
14:04 14:11	London Euston	Crewe	West Midlands Trains	—	2	+
15:03 On time	Crewe via Stafford	London Euston	West Midlands Trains	—	1	+
15:04 On time	London Euston	Crewe	West Midlands Trains	—	2	+
16:03 On time	Crewe via Stafford	London Euston	West Midlands Trains	—	1	+
16:04 On time	London Euston	Crewe	West Midlands Trains	—	2	+
17:03 On time	Crewe via Stafford	London Euston	West Midlands Trains	—	1	+
17:04 On time	London Euston	Crewe	West Midlands Trains	—	2	+
18:03 On time	Crewe via Stafford	London Euston	West Midlands Trains	—	1	+
18:04 On time	London Euston	Crewe	West Midlands Trains	—	2	+

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

Claim No: KB-2025-BHM-000038

Filed on behalf of the Claimant
Ryan Lee-Wilkes
Second Witness Statement
Exhibit RLW04

BETWEEN

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

and

(1) PERSONS UNKNOWN BRINGING CARAVANS/MOBILE HOMES ON TO THE LAND
KNOWN AS CATTLE MARKET CAR PARK, STATION STREET, ATHERSTONE,
WARWICKSHIRE, CV9 1DD ("THE LAND") TO LIVE IN, OR UNDERTAKING DEVELOPMENT
(INCLUDING RESIDENTIAL OCCUPATION) AS DEFINED BY SECTION 55 OF THE TOWN
AND COUNTRY PLANNING ACT 1990 ON THE LAND

Defendants

This is the exhibit RLW04 referred to in the second witness statement of Ryan Lee-Wilkes

Signed:

A handwritten signature in blue ink, appearing to read 'Ryan Lee-Wilkes', is written over a light blue circular stamp.

Dated: 6 March 2025

Evidence of Property Access (Google Street View)

Entrance to Cattle Market Car Park



Showing access to Station Street Surgery



Email: warnoccg.stationstreetadmin@nhs.net

This email address is not for emergencies. We will respond to any email within 1 working day. If your request is urgent please telephone the practice.

NHS 111: Call 111 or visit 111.nhs.uk

Contact Us Online: <https://stationstreet-consult.uk.rapidhealth.co.uk/#/>

NHS App: www.nhs.uk/nhsapp

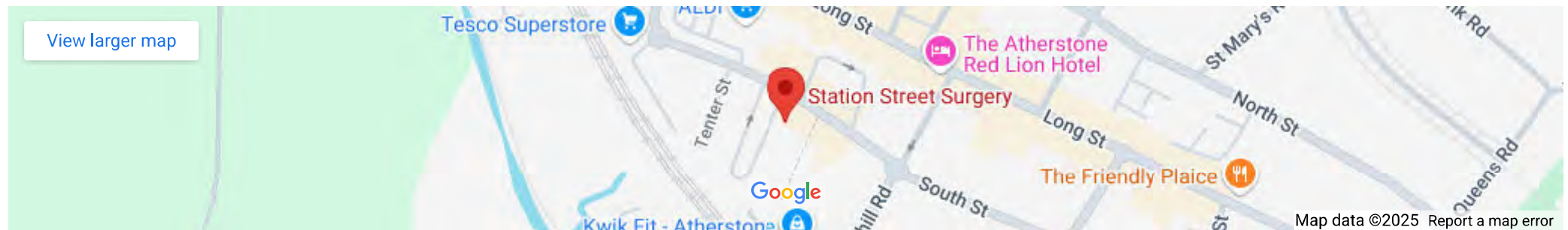
[Find your NHS number here](#)

You do not need to know your NHS number to use NHS services, but it can be useful to have it

RLW04

Location

Station Street Surgery
45 Station Street,
Atherstone,
Warwickshire,
CV9 1DB



[Get directions \(opens in Google Maps\)](#). You can use this link for directions to the surgery if you are driving, cycling, walking or using public transport.

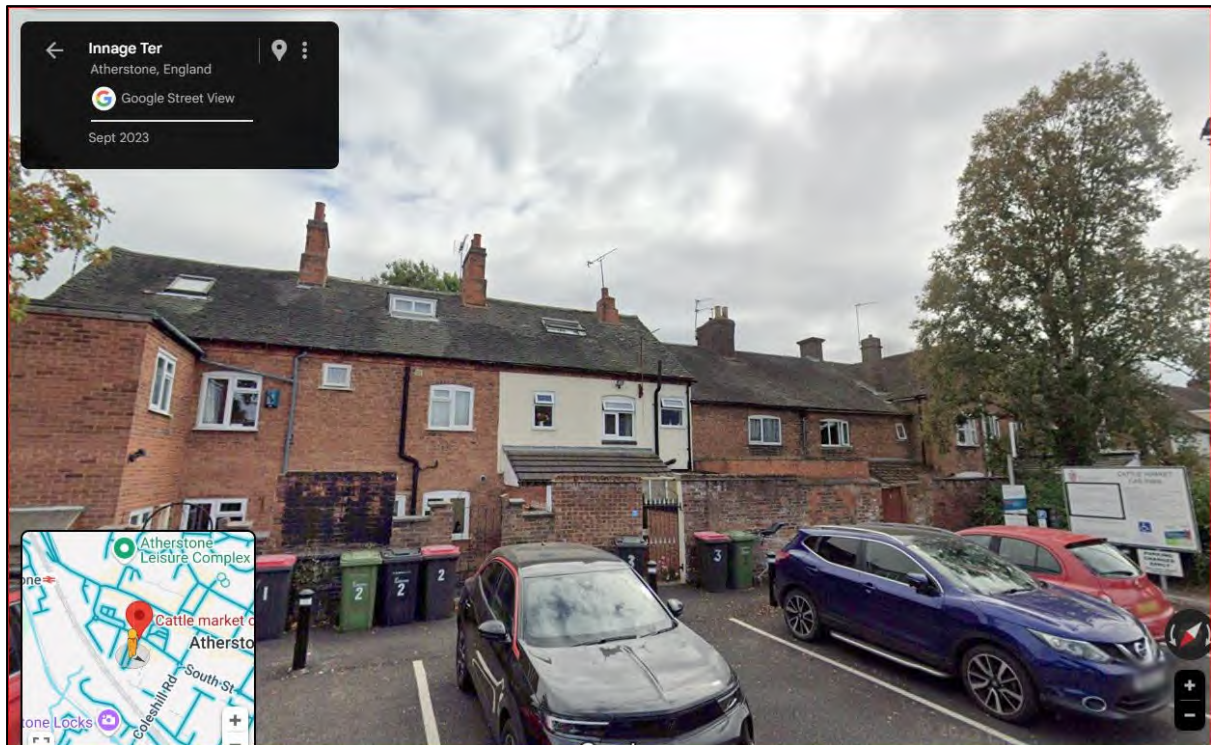
Access

The surgery is all on one level for ease of access for everyone. There are three disabled parking bays outside the front of the surgery in the Cattle Market Car Park, Station Street.

Opening Hours

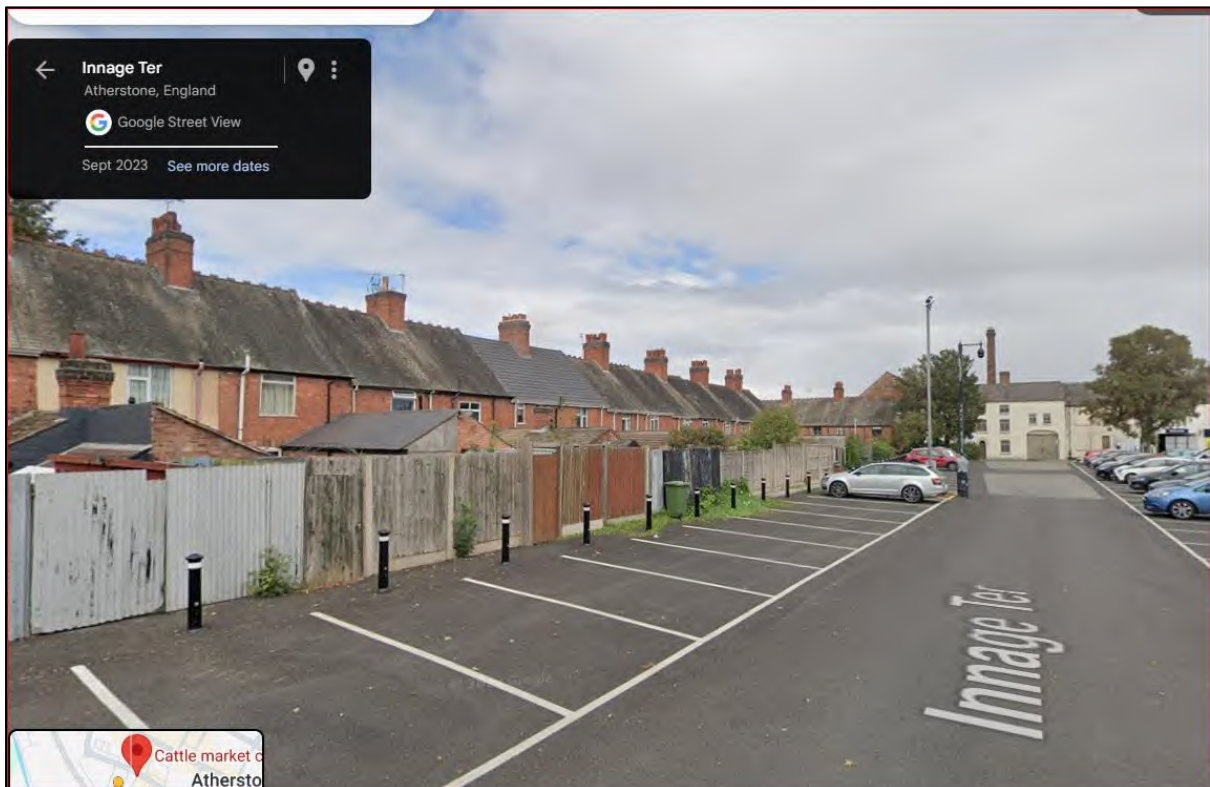
Monday	8.30am to 5.30pm
Tuesday	8.30am to 6.30pm

Showing access to Innage Terrace properties





Showing rear of properties on Tenter Street Properties





Car Park Exit

