

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

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Name of court In the High Court of Justice <i>KB</i>		Claim no. QB-2020-002112	
Fee account no. (if applicable) PBA0087028		Help with Fees – Ref. no. (if applicable) HWF-□□□□-□□□□	
Warrant no. (if applicable)			
Claimant’s name (including ref.) (1) Test Valley Borough Council (2) Hampshire County Council			
Defendant’s name (including ref.) (1) Albert Bowers & others (90) Persons Unknown			
Date		24/04/2026	

1. What is your name or, if you are a legal representative, the name of your firm?

Karen Louise Dunn

2. Are you a Claimant Defendant Legal Representative
 Other (please specify)

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

The Claimants seek relief from sanctions. The Claimants did not serve the evidence in support of their application dated 8th April 2026 by 4pm on the 17th April 2026 as required by order of 9th May 2025

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

5. How do you want to have this application dealt with? at a hearing without a hearing
 at a remote hearing

6. How long do you think the hearing will last? Hours Minutes
 Is this time estimate agreed by all parties? Yes No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

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

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

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

If necessary, please continue on a separate sheet.

1. My name is Karen Dunn, Director of Legal and Democratic Services at Test Valley Borough Council, First Claimant in these proceedings.
2. A hearing is listed on 1st May 2026 for consideration of continuation of an Injunction order prohibiting the setting up of unauthorised encampments in an area comprising 7% of the Borough Council's administrative area. This includes an area encompassing the town of Andover, a car park in Romsey, a sports centre in Romsey and playing fields in Nursling in the South of the Borough.
3. I have had personal conduct of these proceedings since their inception in 2020. An interim order was made by His Honour Judge Bird on 28th July 2020. A final order (including the addition of two sites) was made by His Honour Judge Dight (sitting as a Judge of the High Court) on 17th May 2024. That order was made for five years against various named individuals and for one year against Persons Unknown, with express permission to apply for its continuation.
4. On 9th May 2025 Her Honour Judge Sarah Richardson (sitting as a Judge of the High Court), on application of the Claimants continued the relief against Persons Unknown. Her order also listed review of the matter for 1st May 2026 and gave directions as to service on Persons Unknown of (a) her order and (b) filing and service of any evidence on which the Claimants intend to rely on at the review hearing.
5. In summary, service is effected upon Person Unknown by fixing copies of the relevant document in a transparent envelope in a prominent position on or close to all adopted highway entry points into the defined area (the area described above as encompassing Andover) and for the other locations (Alma Road Car Park Romsey, Romsey Rapids Sports Centre and The Nursing and Rownhams Village Hall and playing fields) at a prominent location on the land.
6. Throughout these proceedings Persons Unknown have been served by fixing out copies of documents. Originally, for the Andover area, this was at equidistant points around the perimeter of the area. On making the interim order final, His Honour Judge Dight varied this slightly to fixing at highway entry points only and Her Honour Judge Sarah Richardson continued this provision. This still necessitates fixing out documents at approximately 50 locations.
7. The Order of her Honour Judge Richardson dated 9th May 2025 giving notice of the 1st May 2026 hearing was served in accordance with the order on 16th May 2025 by Quality Bailiffs Ltd fixing the order out at the Andover area highway entry points, and in respect of the other three sites by me personally fixing the order at the entrance to each site. Historically, I have always dealt with service at these three locations as they are at the southern end of the Borough, on my route to work and relatively near to my home.
8. Any evidence on which the Claimants intended to rely at the review hearing was to be filed and served by 4pm on 17th April 2026.
9. This evidence comprised my fourteenth Witness Statement and the third Statement of Nicholas Waite, the Second Claimant's Gypsy and Traveller liaison officer. This evidence was filed via CE filing on 17th April 2026.

See continuation sheet

Continuation of Form N244

11. On 16th April 2026 I met with Grant Bailey of Quality Bailiffs Limited and handed him a set of documents in transparent envelopes for fixing out at the highway entry points around the Andover Area. I personally fixed the documents at the other sites as described above. These documents comprised a covering letter from me attaching the Application Notice and draft order for the hearing on 1st May 2026 and directed the Defendants to a link where the Council's evidence in support of the application could be found and also notifying them that the Copies could be examined at the Council's Offices. These documents were fixed out around the area as required by the order. Accordingly, the application itself was served.
12. Alongside filing the documents on 17th April, I put together an email sending the documents to the Council's website team for uploading.
13. This is where the issue occurred which gives rise to this application.
14. Yesterday, on 23rd April 2026 at just before 2pm, Counsel Natalie Pratt advised me that she could not see the evidence on the Council's website.
15. Having become aware of the issue, I looked at my emails and spoke to the website team. It seems that I did not send the email. I cannot explain this; I had spent the day immersed in preparations for the upcoming hearing and that was the next logical step in my work. I did not do this deliberately; that would be nonsensical, it was an error on my part. A serious one and one for which I am deeply sorry.
16. I immediately made arrangements for the documents to be uploaded to the Council's website, and they were uploaded by the end of the business day yesterday save for the draft order which was uploaded this morning.
17. I then immediately started drafting this application.
18. Whilst in no way seeking to minimise or underplay the gravity of the documents not appearing on the website, I would like to make the following points in support of the proposition that the Defendants are not unduly prejudiced by this omission.
19. In the letter served accompanying the documents (a copy is attached), a telephone number is given for the Council. If any Defendant had attempted to access the evidence via the link and was unable to do so, they could have telephoned and we would have made the documents available. No telephone calls have been received.
20. A set of proceedings is available for inspection at the Council's offices, to which the application and evidence have been added, and no Defendant has come to view them.

20. Whilst not a party to the proceedings, the Claimants have kept Gypsy and Traveller liaison and support groups updated as to the upcoming hearing. On 7th April 2026 Derbyshire Gypsy Liaison Group, Friends Families and Travellers and London Gypsies and Travellers Sharpe Pritchard Solicitors acting for the Claimants were notified via email that a review hearing was taking place on 1st May 2026 and that the Claimants intended to seek to extend the Injunction for a further period of 12 months and inviting their input and comments and advising that the bundle would be shared with them in due course. No comments or representations have been received to date.
21. I humbly request that the Court grant this application and permit the evidence to be relied on at the hearing on the 1st May 2026. I also request that this application is dealt with at commencement of proceedings on that day.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.


No

Statement of Truth

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

- I believe** that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



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

Date

Day Month Year

2	4	0	4	2	0	2	6
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Full name

Karen Louise Dunn

Name of applicant's legal representative's firm

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

Director of Legal and Democratic Services, First Claimant

Applicant's address to which documents should be sent.

Building and street

Beech Hurst

Second line of address

Weyhill Road

Town or city

Andover

County (optional)

Hampshire

Postcode

S	P	1	0	3	A	J
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If applicable

Phone number

01264 368401

Fax phone number

DX number

123080 ANDOVER 6

Your Ref.

KLD/

Email

kdunn@testvalley.gov.uk

**To Persons Unknown seeking to establish
Unauthorised Encampments within the
Borough of Test Valley**

Beech Hurst
Weyhill Road
Andover, Hampshire SP10 3AJ
Telephone 01264 368000
Minicom 01264 368052
Web site www.testvalley.gov.uk

Contact: Karen Dunn
Telephone: 01264 368001
E-mail: kdunn@testvalley.gov.uk
Date: 16 April 2026

NOTICE

Dear Sir/Madam

INJUNCTION- PREVENTING UNAUTHORISED ENCAMPMENTS ON LAND WITHIN TEST VALLEY WITHIN THE LAND EDGED RED ON THE PLANS ATTACHED TO THE ORDER DATED 9TH MAY 2025 CLAIM NUMBER QB-2020-002112

Please find attached, by way of service upon you, Form N224 Application and draft Order in respect of the above claim.

The witness statements and evidence in support of the attached Application can be found:

1. On the Council's website using the following link: [Unauthorised Encampment Injunction Application & Orders | Test Valley Borough Council](#); or
2. At the Council's Offices at the Beech Hurst, Weyhill Road, Andover, SP10 3AJ from 9am to 5.00pm (4.30pm on Friday)

You are advised to consult a solicitor as soon as possible should you have any concerns or questions regarding the enclosed.

Yours faithfully

Karen Dunn
Head of Legal and Democratic Services