

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND  
OF THE TOWN AND COUNTRY PLANNING ACT 1990

SURREY COUNTY COUNCIL

Claimant

-and-

(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT AND  
OCCUPANCY FOR RECREATION PURPOSES AT CROBHAM COMMON, SURREY

(2) PERSONS UNKNOWN DEPOSITING WASTE OR LITTERING ON CROBHAM  
COMMON, SURREY

Defendants

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EXHIBIT "IH5"

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This is Exhibit "IH5" referred to in the Witness Statement of Ian Horgan dated 11/08/2022

.....  
IAN HORGAN

Dated 11/08/2022





Other health and species include the moss *Dicranum spurium* and the lichens *Cladonia strepsilis* and *C. arbuscula*

### Invertebrates

The Common is a very important national site for invertebrates, particularly ants, bees and wasps (Hymenoptera), aquatic beetles (Coleoptera), flies (Diptera), butterflies and moths (Lepidoptera) and spiders (Araneae). Sixty-four scarce or rare species have been recorded. Rarities include the ant *Fornica rufibasis*, known elsewhere in Britain only in the Isles of Scilly; the robber fly *Eutonno rufibasis*, the saddlebug *Mocanthis nigralis* and sizeable colonies of the silver-studded blue butterfly *Plebejus argus*. Crdham Common has the largest known spider fauna in Britain (approximately 50% of all British species have been recorded here), including the rare *Oxyopes heterophilus*, *Chiracanthium penni*, *Araneus alsine* and *Uloborus valdnerianus*.

### Birds

The extensive open heathland scrub within the site supports many species of characteristic birds, often at high densities. The population of nightjar *Caprimulgus europaeus* is particularly high.

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Claimant

-and-

(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT AND OCCURRING FOR RECREATIONAL PURPOSES

(2) PERSONS UNKNOWN DEPOSITING WASTE OR LITTER-TIPPING ON CROBHAM COMMON, SURREY

Defendants

EXHIBIT "IH6"

This is Exhibit "IH6" referred to in the Witness Statement of Ian Horgan dated 16/08/2022

IAN HORGAN

Dated 16/08/2022

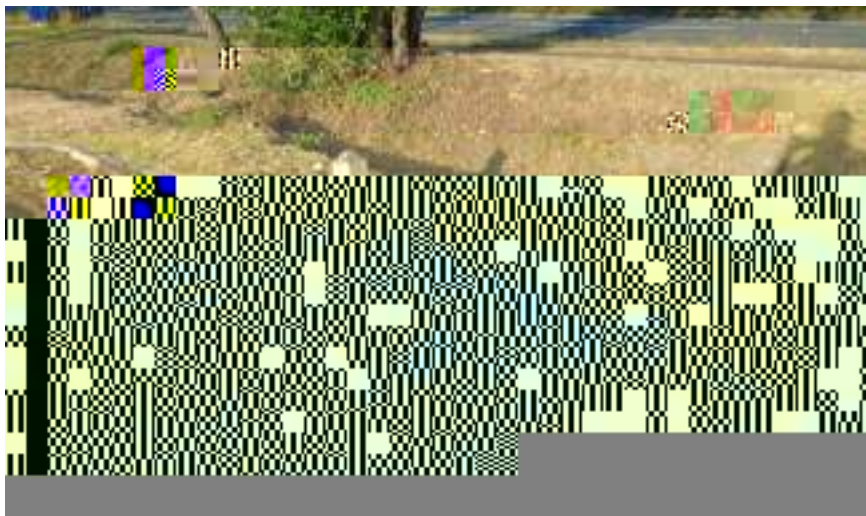
**Croghan Common Roundabout Car Park - Fly Tipping Photos 1818**



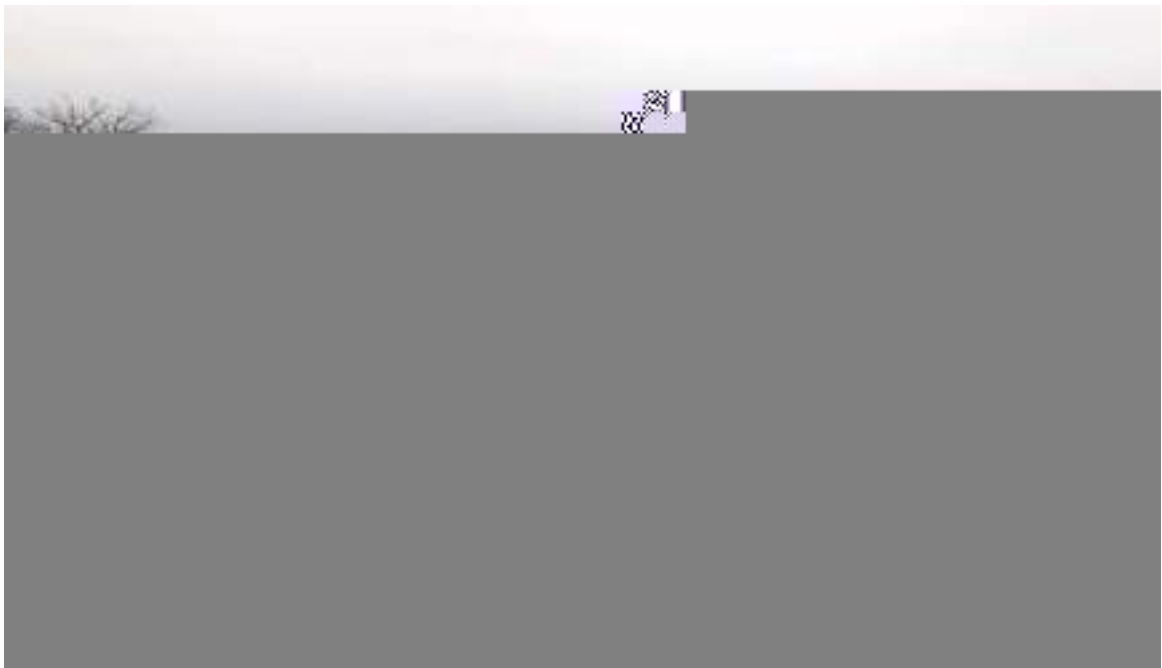
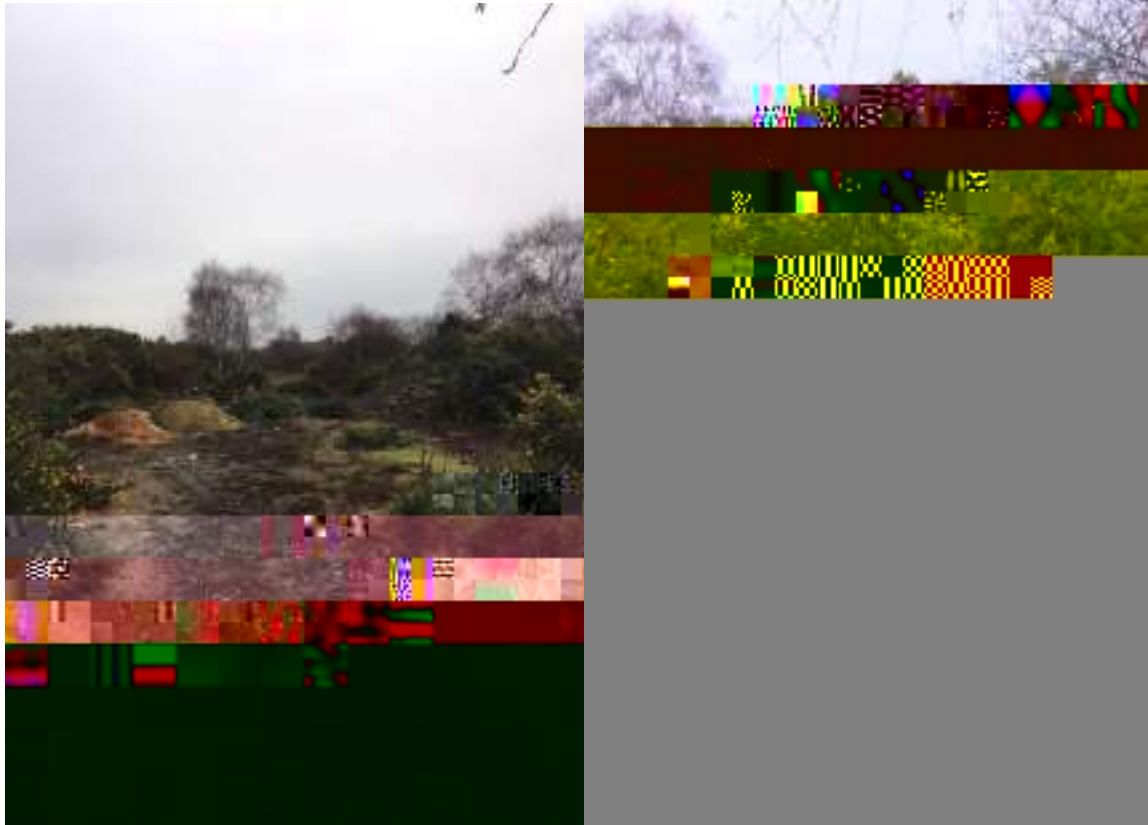








**18022019 Staple Hill & Chobham Common Roundabout**





IN THE HIGH COURT

QUEEN'S BENCH

IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972 AND

SECTION 247 OF THE TOWN AND COUNTRY PLANNING ACT 1990

SURREY COUNTY COUNCIL

Claimant

-and-

(1) PERSONS UNKNOWN FORMING AN UNAUTHORISED ENCAMPMENT AND OCCUPANCY FOR RECREATION PURPOSES AT CROBHAM COMMON, SURREY

(2) PERSONS UNKNOWN DEPOSITING WASTE OR LITTER-TIPPING ON CROBHAM COMMON, SURREY

Defendants

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EXHIBIT "IH7"

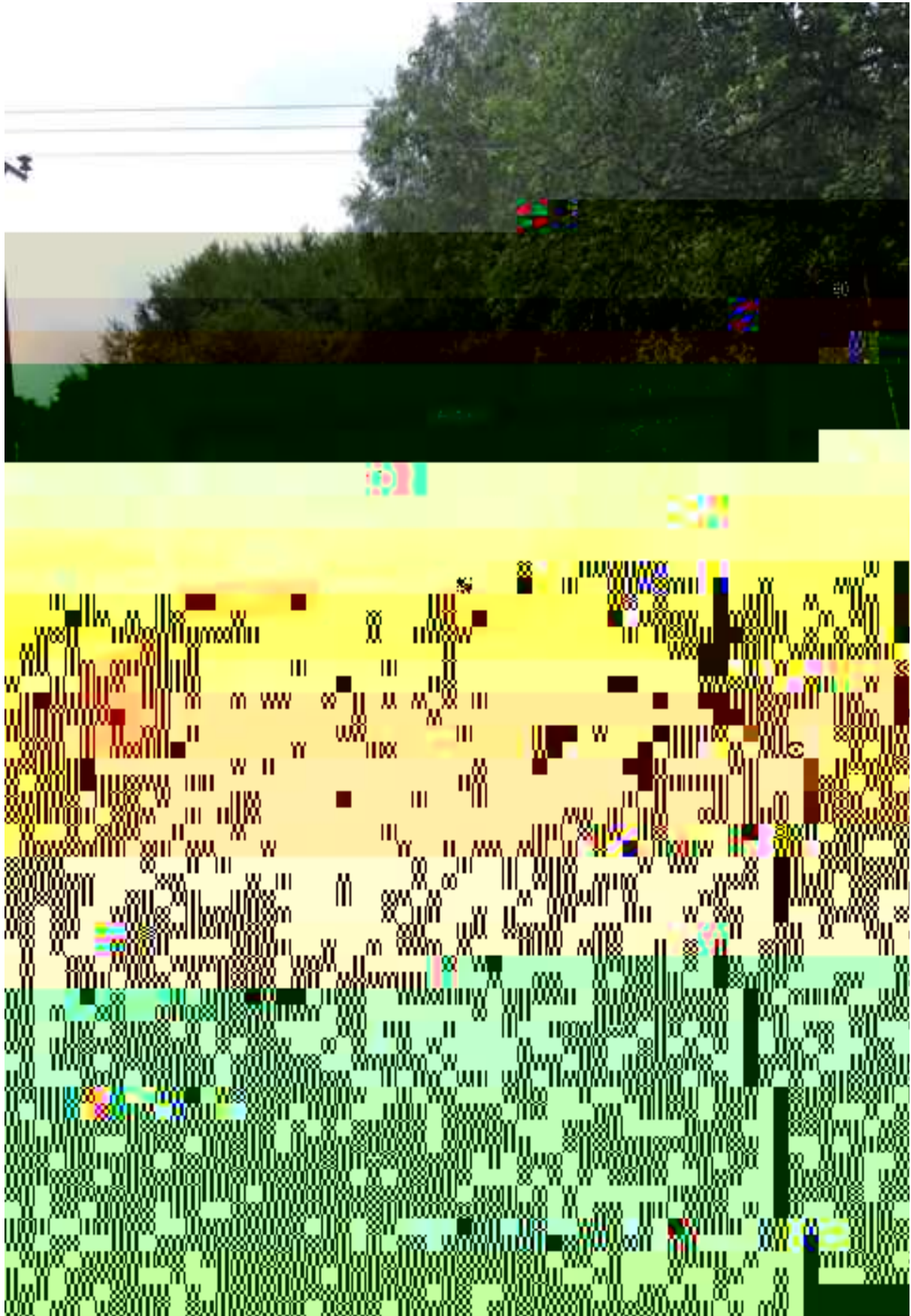
This is Exhibit "IH7" referred to

IAN HORGAN

Dated 1/10/2010

## 2019 Staple Hill & Chobhan Common Roundabout Chicane's













Jacque

**Tel: 0288 541 9097**  
**Please ask for: Jacqui Hughes**  
**Email: [Jacqui.hughes@suneystcc.gov.uk](mailto:Jacqui.hughes@suneystcc.gov.uk)**



**Mr Jeremy Hate**  
**Secretary**  
**Suneyst Gypsy Traveller Communities Forum**  
**CO Bourne Hall Museum**

**By email only: [jhate@epsomewell.gov.uk](mailto:jhate@epsomewell.gov.uk)**

**Our ref: Legal/111218/JAH**

**13 July 2022**

**Dear Mr Hate**

**RE: Chobham Common Injunction – s222 Local Government Act 1972 and  
S187B Town and Country Planning Act 1990**

**I am writing to you in your capacity as Secretary to the Suneyst Gypsy Traveller  
Communities Forum**

**I am instructed to write to you by the Land and Property Services Department of  
Epsom and Ewell Borough Council to apply for a fresh  
continuing greenspace injunction so that Chobham Common continues to be  
protected from unauthorised campers and fly tipping after the expiry of the existing  
injunction on 10 November 2022. Chobham Common is an area of special scientific  
interest, and a local nature reserve, from unauthorised encampments and fly tipping**

Your



Legal Hub

Legal & Democratic Services