

Statement on behalf of the Applicant  
Witness: Tanya Mutch  
1st Statement  
Dated: 29 May 2026  
Exhibits: TMM1 - TMM7

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

**Claim No. KB 2026-**

**IN THE MATTER OF SECTION 187B TOWN AND COUNTRY PLANNING ACT 1990**

**BETWEEN:**

**SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL**

Applicant

and

**TOM PRICE (1)**

**ASHLEIGH PRICE (2)**

**JACOB LEVY (3)**

**FRANCES O'DONOGHUE (4)**

**TRISTIAN SMITH (5)**

**MICHEAL FLYNN (6)**

**MARK COOPER (7)**

**WILLIAM DOHERTY (8)**

**DOUGLAS WARD (9)**

**WILLIAM FAULKNER (10)**

**MAISIE CLARKE (11)**

**MARY DOHERTY (12)**

**GERRY CONNORS (13)**

**DREWEY AMBROSE PRICE (14)**

**PERSONS UNKNOWN**

**(being persons who are entering, occupying, residing on, bringing caravans, mobile homes or other structures onto, or carrying out or intending to carry out works or development on, land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire, as shown edged red on the plan attached to this Order) (15)**

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## **WITNESS STATEMENT OF TANYA MUTCH**

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### **INTRODUCTION**

1. I am Tanya Mutch. I am employed as a Senior Planning Compliance Officer (Projects) at South Cambridgeshire District Council.
2. I make this statement in support of the Council's application in these proceedings. Unless otherwise stated, the facts and matters set out in this statement are within my own knowledge, information or belief. Where matters are based on information supplied by others, I identify the source so far as I am able.
3. I have over 23 years' experience in investigative roles, including 17 years with Cambridgeshire Constabulary, where I served as a Detective Sergeant. I am experienced in evidence gathering, interviewing and preparing matters for court.
4. In my current role I investigate breaches of planning control, carry out site inspections and prepare evidence for enforcement action, including injunction proceedings. I understand the importance of accuracy, objectivity and evidential standards.

### **THE SITE**

5. The site is located to the west of the Moor Drove Traveller Site, Histon, Cambridgeshire. It is accessed from the B1050 between Histon and Cottenham.
6. I am familiar with Moor Drove as a result of both my policing experience and my planning enforcement work. I am aware of historic issues involving unauthorised development in this locality.
7. Approximately three months before the events described below, I visited the land with Chris Barnes and Police Officer Robert Taylor. At that time, the land was undeveloped. It contained mature trees and vegetation, there was a pond present, and no operational development or residential occupation had taken place. A pre-development image of the site is exhibited at TMM1.

### **SERVICE OF THE INJUNCTION ON 25 MAY 2026**

8. A High Court injunction order was obtained and was served on 25 May 2026 at approximately 13:22, with police present.
9. Before service, at approximately 12:22 on 25 May 2026, a police drone recorded the works while the site was still in the course of development. The drone images showed vegetation cleared from the majority of the site, trees cut down and piled at the rear of the site in a

mound exceeding three metres in height, a central strip of hardstanding laid, plots being marked out, fencing partially erected, three mini diggers actively levelling the land and several small caravans already positioned on the land.

10. Those drone images are exhibited at TMM2. They show the site in mid-development, including active machinery, cleared land, the emerging plot layout and initial caravan placement.
11. From my observations and from the images, I consider that the works were extensive, that they fundamentally altered the character and use of the land, and that they were being undertaken quickly and in a coordinated manner.

### **BREACH OF THE INJUNCTION**

12. Following service of the injunction, on 26 May 2026 I requested a further police drone fly-over. The drone was flown over the site at approximately 11:24 on that date. The fly-over showed a clear and significant breach of the injunction. I obtained a still image from the video screen grab from that fly-over and exhibit it as TMM3.
13. When comparing the position shown on the 25 May 2026 drone images with the position shown during the 26 May 2026 fly-over, it was apparent that the fencing had been completed across the site, the plots had been formalised and enclosed, additional very large and newer caravans had been brought onto the land, modern and habitable touring caravans had appeared, structures including toilet blocks had been introduced, and groundworks consistent with septic tank installation had occurred.
14. In my professional assessment, this demonstrated that development had continued after service, that occupation had increased after service, and that the injunction was being disregarded. The level of change within such a short period could only have occurred through continued, deliberate and well-coordinated activity after service of the injunction.

### **ATTENDANCE ON SITE ON 26 MAY 2026**

15. At approximately 14:10 on 26 May 2026, I attended the site with Chris Barnes, Tony Wallis, Police Sergeant Robert Taylor and PC Thomas Lazaro.
16. Police presence was required because of previous aggression towards enforcement teams and the risk that officers could be blocked in on the site.
17. The purpose of my attendance was to serve copies of the injunction order and to seek to complete welfare questionnaires with any person who would engage with us. At that stage, we did not know how many people would be present on the site. Our plan was to serve the injunction, obtain as much information as possible from persons present, and identify any welfare issues.
18. Chris Barnes and I began at the westernmost part of the site, at the last plot containing caravans. We started at the far end of that plot, near the line of dead trees which created a large barrier. The police officers were present primarily to ensure that no aggression was shown towards us. They also carried out their own checks, including obtaining vehicle

details and checking whether plant and machinery on site, including diggers, were legitimately present.

19. When we entered the site, we knocked on the first caravan door and spoke to a female occupant. While that conversation was taking place, a silver Volvo arrived on the site. A male in or associated with that vehicle claimed to have an interest in the site. At that point, Chris Barnes and I separated. He spoke to the male, and I continued to serve the injunction and to speak to the other residents and persons present.
20. I worked my way through the site. I prioritised the plots containing newer, larger and more habitable caravans so that I could speak to any occupants. I then continued through the site affixing copies of the injunction in plastic wallets to the smaller and older caravans, to plot entrances and to the fence lines. I also placed a copy of the injunction at the entrance to the site and fixed further copies along the fence line near the bend where the hardstanding turned to the right.

### **PLOT 13**

21. The first plot I attended is now believed by me to be plot 13. It contained two very large new caravans stationed side by side. There were three structures between them, and it appeared that something large had been dug into the ground at the back of the caravans.
22. The occupant I spoke to was a young white female who appeared to be in her early twenties. She was with two young children, who appeared to be approximately three and five years old.
23. She refused to provide her name or any details for herself or for the children. She engaged with me, but she declined to provide substantive answers. She said that she did not know she should not be there and that I needed to speak to her mother, who was in the next plot.
24. I explained to her that they were not allowed to be on the site. I explained that a High Court injunction had been sought and issued, and that they were therefore not permitted to remain on the land. I told her that, because this was a High Court matter, they needed to move off the site and that remaining on the site could place them in contempt of court.
25. The female repeatedly said words to the effect of, 'I don't know what you mean', 'I don't want to talk about it', and 'you need to talk to my mum'. She pointed towards the next plot, where she said her mother was staying in a long, new motorhome. I explained that the Court could impose fines and could order removal if it considered that appropriate. I also explained that the information had been included in the notices served on the site before she moved onto it after the injunction had been issued.

### **PLOT 11**

26. I then moved to the next plot down on the western side, which I now believe to be plot 11. There was a large motorhome and a large touring caravan on the plot. They were positioned on either side of the plot, against the fence line. Behind the motorhome there was a plastic structure.

27. The occupant I spoke to was an older white female, who appeared to be in her late fifties or early sixties. She had an Irish accent, was approximately 5 feet 2 inches tall, and had dark hair tied back.
28. She refused to provide her name or details. She engaged with me but declined to provide substantive answers. I explained that she was not allowed to be on the site, that a High Court injunction had been sought and issued, and that she was not permitted to bring caravans onto the land or stay there. I also explained that she needed to move off the land and that remaining could place her in contempt of court.
29. I explained that the Court could impose fines and could order removal if it considered that appropriate. I also explained that the Council had aerial photographs showing that she had come onto the site after service of the injunction. She said that she was homeless and that there was nowhere for her and her family to go.
30. Because I needed to continue serving the injunction paperwork on all caravans and plots, I asked Tony Wallis to carry out a welfare discussion with her while I continued through the site.
31. Tony Wallis later informed me that the female told him she was Francis O'Docherty, date of birth 25 June 1978. He explained to her that she was in breach of a High Court injunction and that the caravans would need to be moved off the land. He discussed the welfare questionnaire with her, and she asked him to leave it with her for completion and submission to South Cambridgeshire District Council.
32. Tony Wallis also informed me that she said she had moved onto the site over the weekend of 22 May 2026, that she was living in a Challenger Excelsior caravan, and that she, her partner and two dependent children had nowhere else to go if evicted. Tony Wallis confirmed to her that South Cambridgeshire District Council has a Traveller Liaison Officer if she preferred to speak with that officer directly.

## **PLOT 12**

33. I then attended the plot opposite, adjacent to the east of plot 11, which I believe to be plot 12. That plot contained a large new-style motorhome and a large touring caravan positioned at right angles to each other. There was also another structure present, which appeared to be a trailer-mounted toilet block or similar structure.
34. A white male was present. He appeared to be approximately 50 years old, approximately 5 feet 6 inches tall, with dark hair. He was wearing a blue vest top and jeans.
35. I approached him and asked whether he owned or resided in the caravans. He said that he was just visiting. I asked for his name and asked the purpose of his visit. He replied that he was just visiting and that it was none of my business. I asked where he was from and who he was visiting. He again declined to provide information and repeated words to the effect that he was just visiting and knew nothing.
36. I handed him a copy of the injunction because he was present on the site and appeared to have a connection with the land. I began to explain the injunction and that the caravans had

been brought onto the site after the injunction had been served. He walked away from me, saying that it had nothing to do with him.

## **PLOT 8**

37. I then moved to the next plot on the eastern side, being the third plot down from the top tree line, which I believe to be plot 8. There were two modern and more habitable touring caravans side by side. They were connected to a generator, which was running.
38. A female answered at the first caravan. She appeared to be approximately 23 years old, was of very slim build and had long dark hair. As I began to introduce myself, she stopped me and said that she had an autistic child who needed attention. The child was male, appeared to be approximately seven years old and had dark hair. I told her that I would affix the paperwork to the other caravan and then return so that she could attend to her child.
39. There was no answer at the second caravan. I affixed a copy of the injunction to that caravan in plain view.
40. When I returned to the female, I introduced myself and explained where I was from. I asked for her name and where she was from. She declined to answer directly and said that she would rather not say. She said that she was homeless and that council sites were terrible. I asked which site she meant, because South Cambridgeshire sites are well managed. She said it was not one of our sites. I asked again where she was from and who she was, but she again said that she would rather not say. She repeatedly said that she was homeless, had nowhere to go and had family on the site. When I asked where, she again said she would rather not say.
41. I asked whether she owned the land or knew who owned the land. She said that she did not know. I asked whether there was any family member on whose plot she could temporarily place her caravan while she sorted matters out. She said there was not.
42. I explained that she was not allowed to be on the site, that a High Court injunction had been sought and issued, and that she was not permitted to remain on the land. I explained that, as this was a High Court matter, she needed to move off the site and could be in contempt of court if she did not. I also explained my concern that significant development had been carried out on the land. I handed her a copy of the injunction at 14:21 and took a photograph of service, which I exhibit as TMM6.

## **FURTHER PLOTS AND SERVICE ACROSS THE SITE**

43. I knocked on every caravan door, including the smaller caravans which did not appear very habitable. There was no further engagement from occupants. I ensured that copies of the injunction were affixed to every caravan, every plot entrance and the fence lines.
44. On the plot believed to be plot 6, there was a long caravan positioned next to a half-built wooden structure which had been partly covered with plastic. There was also a further, smaller and much older caravan positioned at the rear of that plot.

45. On the plot believed to be plot 4, there was a single medium-sized caravan of an older style positioned towards the back of the plot. Plots 1 and 2 were empty. Plot 3 had an older-style, medium-sized caravan positioned on it. Plot 5 had a small and very old caravan positioned on it. Plot 7 had two long caravans positioned on either side of the plot. Plot 9 had a very small and very old caravan positioned directly behind the large motorhome on plot 11, with fencing between them.

## **DELIVERY VEHICLE INCIDENT**

46. At approximately 14:40, a 4x4 vehicle entered the site carrying, or towing, what appeared to be a toilet block. I stopped the vehicle and asked the driver who he was and what he was doing. The driver was a large male in his mid-to-late twenties with ginger hair and a ginger beard. He refused to provide details, other than to say that he was delivering the trailer.
47. I asked him his purpose, which company he worked for and what was in the trailer. He directed me to speak to a second male who was walking up the central track. I told the driver that he should not deliver the item because it appeared to be a toilet block which would facilitate persons living on the site. I told him that he needed to turn around and take it away.
48. The second male was white, appeared to be in his mid-twenties, was of very large build but not muscular, and had short dark hair. I introduced myself and asked whether he was the landowner. He initially said that he was. When I asked his name, he said that he would not give me those details and that I did not need them. I tried to explain the injunction to him, but at that time he was trying to get the vehicle to turn around, so I said that I would catch up with him when that was done.
49. When the male was at the top of the site, I walked up to him after the vehicle had successfully carried out a U-turn in the top plot on the western side of the site. As I approached, he said that he was not the owner, that he had nothing to do with the site, that I should leave him alone and that he had nothing to do with being there.
50. I handed him a copy of the injunction and said that, as he was present on the site, he needed a copy. I then attempted to ask him questions, but he repeatedly said that he was not telling me anything. I asked why he had either lied a few minutes earlier, or was lying now, about owning the land. I also asked if I could take his photograph to show that I had served the injunction on him.
51. That appeared to act as a catalyst. He became angry, raised his voice and waved his arms, telling me that I was not allowed to take a photograph of his face. I managed to take a photograph, although it did not capture his face. I exhibit that photograph as TMM7. It was taken at 14:45 and shows him walking away with the injunction in his hands.
52. PC Lazaro approached me while I was speaking to the male and told the male that there was no need to speak to me in that way. The male walked away, waving his arms and saying that he would not answer any questions. Before he walked away, I managed to tell him that he was in breach of the injunction and that it was a High Court injunction.

## **OTHER PERSONS AND PHOTOGRAPHS**

53. One individual was identified by a colleague as an interested party, but I did not obtain any further information about him at that time. As we were preparing to leave, we made clear that we would return in 24 hours and that, if the persons on site had not moved off, the matter would be taken back to the High Court.
54. The photographs I took while on site on 26 May 2026 are exhibited collectively as TMM4.

## **FOLLOW-UP VISIT ON 27 MAY 2026**

55. At approximately 14:30 on 27 May 2026, I returned to the site with Police Sergeant Taylor and PC Lazaro. When we entered the site, the larger caravans were still in situ. The same overall number of caravans appeared to remain on site. Some had not moved, but within some plots caravans and structures had been repositioned.
56. On plot 8, the caravans had been moved towards the fence line of the plot.
57. On the plot I now know to be plot 13, the caravans had been repositioned and the plot had been tidied. The caravans had been repositioned against the fence line, with one caravan placed at the back of the site. The structures which had previously been between the caravans had been moved towards the edges of the plot, making the plot more usable. Sheds had been placed in the corner. In my view, the arrangement gave the impression that the occupiers intended to remain, rather than leave as requested.
58. During that visit, I spoke again with the older female, who was then in plot 13. I had a conversation with her about the continued occupation. Again, she would not say who the landowner was or who had organised her coming onto the site. I asked how she knew when to come onto the site, given that the development had taken place at rapid speed. I also asked why she had not left the site when requested to do so the previous day.
59. She replied that she was homeless and had nowhere to go. She said that council sites were dangerous, that she had children with hospital issues and that there were family members with COPD. I asked whether she had declared herself homeless with the Council and which site she had an issue with, explaining that our Council sites are well run and that, if they were not, we would need to know. She said that it was not this Council's site and said that she had not declared herself homeless. She would not say which area she had come from.
60. I asked why, if she knew she was coming to South Cambridgeshire, she had not contacted the Council. I asked whether there were any family members with plots elsewhere where the caravans could be placed temporarily while matters were sorted out. I also asked whether they had completed the welfare questionnaire, which would help identify what assistance might be needed. In response to each question, she said that she would rather not say and that she needed to speak to her solicitor.
61. I told her that speaking to her solicitor was a good idea. I asked whether she had spoken to her solicitor about the injunction and whether they had advised her on what it meant and what could happen. She again replied that she would rather not say.

62. I explained that this left me with no option but to continue the enforcement process. I explained that the development was a breach of planning control and that the High Court had issued a temporary injunction preventing the bringing onto the land of caravans for habitation. I explained that this had occurred after the injunction was served and that this meant the injunction was being breached. I also explained that, if she wanted the position changed, she would need to contact the Court to seek to have the injunction varied. She again said that she would speak to her solicitor. I gave her my email address and told her that her solicitor could contact me if necessary, but that, as matters stood, I had to continue with the process.
63. The conversation was civil. However, she did not answer my questions, did not provide identifying details and did not show any sign that she intended to leave the site.
64. I also told her that, although I could not say what would or would not happen, the Court could, if it considered it appropriate, issue an arrest warrant and consider the seizure of assets. I made clear that I was not trying to scare or threaten her, but I wanted her to understand the possible seriousness of the situation so that she could not later say that she did not know.
65. In summary, she refused to identify the landowner, refused to provide any prior address or location, and refused to confirm any lawful basis for the occupation. The photographs I took during the visit on 27 May 2026 are exhibited collectively as TMM5.

#### **ASSESSMENT OF BREACH**

66. From my site visits, I consider that the terms of the High Court injunction are being breached. In particular, there is clear evidence of unauthorised habitation on the land and associated operational development.
67. The matters I observed include the stationing of touring caravans and other structures for the purpose of human habitation, the erection of buildings, fencing and other structures, the bringing onto the land of domestic paraphernalia consistent with residential use, the spreading of hardcore, aggregate and other materials to create living areas, tracks and pathways, the carrying out of engineering operations to facilitate occupation of the site, and indications that septic tanks or similar drainage infrastructure have been installed.
68. Taken together, those activities represent a material change of use of the land to residential occupation and associated operational development. I believe that they fall within, and breach, paragraphs 1 to 9 of the injunction.
69. I have also observed that structures within the site have been moved or repositioned after occupiers had been made aware that they were in breach of the injunction. In my view, those actions appear deliberate and appear to have been carried out with the intention of further establishing the use and entrenching their presence on the land, rather than remedying the breach.

70. The repositioning and consolidation of caravans and structures gives the clear impression that the occupiers intend to remain on site, notwithstanding the requirements of the High Court order.

## **CONCLUSION**

71. Throughout my attendances on site, multiple individuals refused to provide their names, addresses or any details of their connection to the land. Those present were predominantly women and children, and no individual was willing to identify themselves as being responsible for the land or the development. This consistent lack of cooperation significantly limited the Council's ability to identify those responsible and impeded the Council's ability to take immediate and effective enforcement action.
72. The continued presence of caravans, the installation of infrastructure and the reorganisation of the site indicate an intention to remain on the land despite the injunction.
73. In my professional experience, the combination of rapid site establishment, continued development following service of an injunction and refusal by persons on site to provide identifying information presents substantial challenges to effective enforcement.
74. The matters outlined above raise concerns about the effectiveness of planning enforcement and the authority of the Court. A High Court injunction is a serious legal mechanism intended to prevent unauthorised development and occupation. Where such an order is disregarded, and those present refuse to identify themselves or confirm responsibility, this creates significant difficulty in securing compliance and taking further enforcement action. In those circumstances, the inability to identify responsible persons risks undermining the effectiveness of the injunction.
75. If breaches of this nature are permitted to continue without effective enforcement, there is a risk that the planning control regime will be significantly weakened, because unlawful development and occupation may take place in a way that is difficult to regulate or remedy.

## **STATEMENT OF TRUTH**

76. 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: \_\_\_\_\_

Tanya Mutch

Dated: 29 May 2026

## EXHIBIT LIST

<b>Exhibit</b>	<b>Description</b>
TMM1	Google image of the site prior to development.
TMM2	Drone stills taken on 25 May 2026.
TMM3	Drone still/screen grab taken on 26 May 2026.
TMM4	Photographs taken by Tanya Mutch on 26 May 2026.
TMM5	Photographs taken by Tanya Mutch on 27 May 2026.
TMM6	Photograph of the injunction served at 14:21 on 26 May 2026.
TMM7	Photograph of the injunction served on a male at 14:45 on 26 May 2026.

TMM1 Google image of the site before the development



# TMM2 3 drone still images

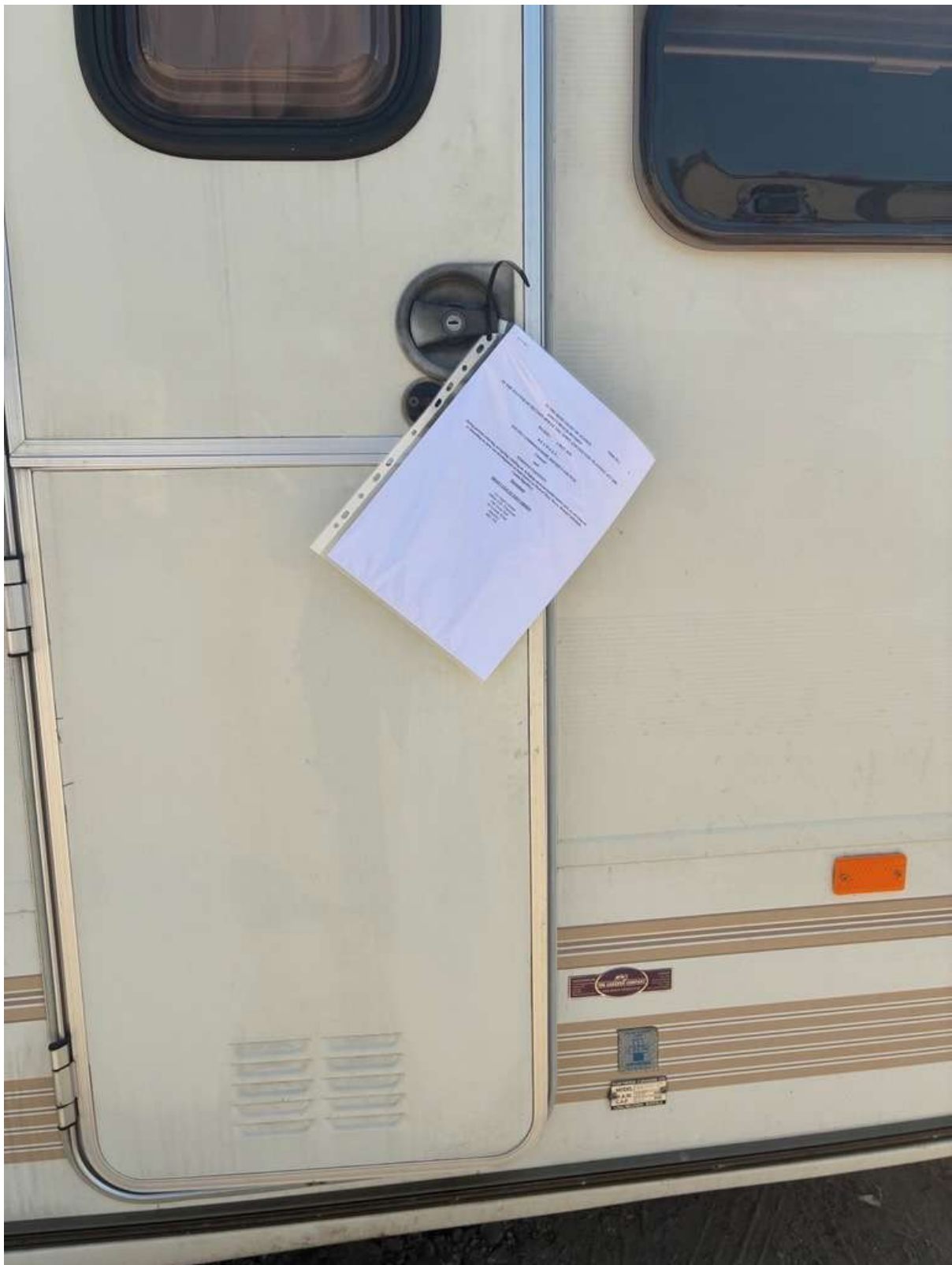




TMM3 Drone stills - Moor Drove 26.205.2025



TMM4 Images of injunction service 26.05.2026 Moor Drove





























































taken on 26<sup>th</sup> May 2026 Moor Drove







TMM5 Photos of Moor Drove taken by Tanya Mutch on 27.05.2026











TMM6 Photograph of serving the injunction taken at 14:21



TMM7 - Photo of Injunction served on male at 14:45

