

**IN THE COUNTY COURT AT  
EDMONTON**

**Claim No. M01ED346**

**BETWEEN:**

**BROXBOURNE BOROUGH COUNCIL**

**Claimant/Applicant**

**-and-**

**(1) PERSONS UNKNOWN  
[more fully described in claim form]**

**(2) LEA VALLEY REGIONAL PARK AUTHORITY**

**Defendants/Respondents**

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**WITNESS STATEMENT OF CAMILLE RANTZ-MC DONALD**

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I, Camille Rantz-Mc Donald, of Broxbourne Borough Council, Bishops College, Churchgate, Cheshunt, Waltham Cross EN8 9XQ will say as follows:

**Introduction**

1. My name is Camille Rantz-Mc Donald, and I am a consultant in the role of Wharf Road Project Manager on behalf of Broxbourne Borough Council (“the Council”).
2. I have over 5 years of experience in planning, primarily within planning policy and project implementation.
3. I hold a Bachelors degree in Geography and Planning from the Sorbonne University (Paris 1), France. A Masters (Hons) degree in Urban and Regional Planning from the University of Amsterdam and am currently a PhD researcher at the University of

Sheffield undertaking research on the impacts of the planning system on the Gypsy and Traveller community.

4. My professional experience began in 2020 when I joined Broxbourne Borough Council where I held roles including: planning administrative assistant, planning policy assistant and senior planner (policy and projects) until 2024.
5. In September 2024 I founded *Rantz Mc Donald Planning*, a consultancy working with both public and private sector clients on a wide range of planning projects.
6. I am authorised by the Council to make this statement in support of its application for an injunction pursuant to s.187B of the Town and Country Planning Act 1990. The decision to seek an injunction was made in accordance with the Council's Constitution by Matthew Gallagher – Development Manager Place and the Chairman of the Council's Planning Committee.
7. Enforcement Consultant Laura White and I conducted a site visit on 27<sup>th</sup> May 2025 to post notice of the injunction hearing held on June 10<sup>th</sup> 2025. We observed the planned expansion of one of the riverfront plots west through the relocation of a fence panel as observed in exhibit CRM1. During this site visit there was a verbal confrontation with several residents of the site and the police were called.
8. As outlined in the Certificate of Service attached in Exhibit CRM2, Laura White and I attended site on Monday 29<sup>th</sup> July 2025 to serve documents containing the details of the Council's successful application for an injunction.
9. During this visit we observed that a new caravan had been stationed on the site within the injunction area as seen on photo no. 5 (Appendix E) of exhibit CRM2. It was stationed at location (i) of exhibit CRM4 sometime between May 27<sup>th</sup> 2025, when the previous site was visited conducted and July 29<sup>th</sup> 2025, prior to the granting of this injunction by the court. During a site visit conducted on October 4<sup>th</sup> 2025, this caravan (see exhibit CRM3) was observed to have been relocated onto a riverfront plot at approximately location (ii) of exhibit CRM4.

10. On July 22<sup>nd</sup> 2025 the Council held a stakeholder meeting on the Wharf Road project. In attendance were representatives from the Lee Valley Regional Park Authority ('Park Authority'), including their Chief Executive, Hertfordshire Police Constabulary, including Broxbourne's Chief Inspector and Broxbourne Borough Council, including the Deputy Chief Executive and Planning and Place Services Director. At this meeting it was agreed to proceed with the project. It will be implemented in a phased manner, subject to legal advice.
11. Following the meeting on July 22<sup>nd</sup> 2025 I have been in telephone correspondence with residents from a limited number of plots on the site. These calls were to provide them with updates on the project's progression.
12. A subsequent meeting was scheduled for September 23<sup>rd</sup> 2025, but needed to be rescheduled. A rescheduled date is yet to be set. This meeting was intended to discuss the practicalities of negotiations between individual plot owners and the Park Authority regarding land swaps, with the Council acting as a facilitator. The Council continues to progress the Wharf Road Project and the protection afforded by the injunction is an essential part of that process.
13. On Monday September 29<sup>th</sup> 2025, the Council's Environmental Health department conducted a site visit at Wharf Road and noted that there had been no further changes on the site. No photos were taken on this occasion. I do not believe that the Injunction Order has been breached in any other respect to date. No further expansion or unauthorised development has taken place since the last hearing and the service of the Court Order. It is essential that the Injunction remains in place for as long as possible in order to prevent any further unauthorised development, as set out in the Council's application and in the witness evidence of Ms Laura White.

**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.

Signed:

A solid black rectangular box redacting the signature of the witness.

Name: Camille Rantz-Mc Donald

Date: 03/10/2025



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**EXHIBIT CRM1**

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Herewith attached is Exhibit CRM1 referred to within witness statement of Camille Rantz-Mc Donald

Broxbourne Borough Council  
Legal Services  
Bishops' College  
Churchgate  
Cheshunt  
Hertfordshire  
EN8 9XQ



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**EXHIBIT CRM2**

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Herewith attached is Exhibit CRM1 referred to within witness statement of Camille Rantz-Mc Donald

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Bishops' College  
Churchgate  
Cheshunt  
Hertfordshire  
EN8 9XQ



## **Certificate of Service**

### **Injunction TOWN AND COUNTRY PLANNING ACT 1990 (as amended)**

**Site:** Land at Wharf Road, Wormley, Hertfordshire

I, Laura White, on behalf of Broxbourne Borough Council, hereby certify that, as described below, the Council served the following documents, containing the details on the Council's application for an injunction by the means stated below:

On Monday 28<sup>th</sup> July 2025, the documents were uploaded onto the Council's website as shown at Appendix A.

On Tuesday 29<sup>th</sup> July 2025, the summary sheet at Appendix B, the QR code at Appendix C, and the injunction, which were placed inside a transparent envelope, were affixed to 4 locations at Wharf Road. This was carried out by myself and Camille Rantz-McDonald.

The locations where the information was posted are shown at Appendix D, labelled 1 – 4 to demonstrate the order in which these were posted on site. The locations are described as:

1. Fence adjacent to western access (What3Words location robe.drips.resist)
2. Fence adjacent to eastern access (What3Words location opens.email.forks)
3. Post, installed by the Council, opposite Plot 21 (What3Words location tens.select.tour)
4. Post, installed by the Council, end of western access (What3Words location part.clubs.wiring)

I took the photographs shown in Appendix E of the information in place. Each photograph shows a laminated copy of the summary sheet, a laminated copy of the QR code and the envelope as posted on site.

During the visit, we were approached by a number of residents who queried the paperwork being left on site. These are identified as follows, in the order in which they spoke with us:

1. Male driver enquiring about new notices and general project plans.
2. A male resident of plot 16 who came to speak with us from his home regarding a newly stationed caravan on plot G. He stated it would be gone by the 4th of August.
3. Male driver names Thomas of plot 39 (plot 46) enquiring about the notices.

**Laura White**  
**Senior Planning Enforcement Officer**

**29<sup>th</sup> July 2025**

## Appendix A – Website

← ↻ <https://www.broxbourne.gov.uk/planning/local-plan-2018-2033/1> A ☆

- [Policies Map \(JPEG\)](#)

**Supplementary Planning Documents (SPDs)**

The following documents have been adopted by the Council as supplementary to the Local Plan:

- [Wharf Road SPD \(November 2023\)](#)
- [Employment and Skills SPD \(November 2023\)](#)

**Wharf Road**

- [Wharf Road Court Injunction 2025](#)
- [General form of Judgement or Order sent to LVRPA dated 14.05.25](#)
- [General form of Judgement or Order sent to Persons unknown dated 14.05.25](#)
- [Injunction Summary](#)
- [Injunction Summary July 2025](#)
- [Injunction Order July 2025](#)

**Additional Council resources**

You can view:

- the Council's [interactive maps](#) that show the layers from the Policies Map, together with additional mapping data (see also the [disclaimer and instruction manual](#))
- the Council's [supplementary planning guidance \(SPG\)](#)
- [Monitoring](#)
- [Statement of Community Involvement](#)
- other [plans and developments](#)
- [Evidence studies](#)

[Join the Planning Policy Consultation list](#)

## Appendix B – Summary Sheet

Borough Offices, Bishops' College,  
Churchgate, Cheshunt, Hertfordshire EN8 9XQ  
Telephone: 01992 785555  
Website: [www.broxbourne.gov.uk](http://www.broxbourne.gov.uk)  
Email: [planning.enforcement@broxbourne.gov.uk](mailto:planning.enforcement@broxbourne.gov.uk)



**BOROUGH OF  
BROXBOURNE**  
[www.broxbourne.gov.uk](http://www.broxbourne.gov.uk)

### FOR THE ATTENTION OF

**PERSONS UNKNOWN** occupying any part of the Land for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans and residential paraphernalia and/or bringing on to any part of the Land (as defined below) or stationing on any part of the Land any caravans/mobile homes.

**WHARF ROAD  
WORMLEY**

### **IMPORTANT – THIS COMMUNICATION EFFECTS LAND AT WHARF ROAD**

Borough of Broxbourne Council ('The Council') has obtained from the court an Injunctive Relief pursuant to Section 187B of the Town and Country Planning Act 1990 and as such the Defendants (Lea Valley Park Regional Authority and Persons Unknown) are forbidden from:

- 1) Occupying any part of the Land (as defined below) for residential purposes (temporary or otherwise) including the occupation of caravans/mobile homes, storage of vehicles, caravans, save for where the Land is occupied in accordance with a lawful planning permission or Written Permission from the Council as Local Planning Authority.
- 2) Stationing on any part of the Land any vehicles, including caravans/mobile homes, except where the Land is occupied in accordance with a lawful planning permission, or Written Permission from the Local Planning Authority

This injunction applies to all of the area shown in light green on the map attached to the Order, which can be found in the envelope attached.

The Order dated 13 June 2025 attached shall remain in force until the seventh day after the court hearing referred to below or until a further Order is made.

Please note the penalty for failure to comply with the Court Order; details are included within the envelope attached.

There is a further court hearing, in which you can present evidence, on **Monday 6<sup>th</sup> October 2025 at 10am at Edmonton County Court**. The court address is County Court at Edmonton, 59 Fore Street, London, N18 2TN. If you wish to participate in the hearing, you must supply to us and the court your evidence no later than **22<sup>nd</sup> September 2025**.

The envelope attached contains the Order and relevant information for anyone who may wish to be heard at court on this matter.

If the envelope has been removed or if you wish to have copy for your records or for full consideration you may also view the documents on the Council's website by following the below link or using the attached QR code:  
<https://www.broxbourne.gov.uk/planning/local-plan-2018-2033/1>

**OR**

In person at the Council's Offices, which are open Monday – Friday, 9am – 5pm. The address is: Bishops' College, Churchgate, Cheshunt, Herts EN8 9XQ

You may wish to seek independent planning or legal advice prior to attending the hearing.

If you have any questions regarding this matter, please email them to: [planning.enforcement@broxbourne.gov.uk](mailto:planning.enforcement@broxbourne.gov.uk) or telephone 01992 785555

**Date: 28 July 2025**

**Ambition  
Broxbourne**  
A space to breathe... a place to grow

**Recycling made easy**  
Get the most out of recycling in Broxbourne  
For more information, visit [www.broxbourne.gov.uk/recycling](http://www.broxbourne.gov.uk/recycling)  
© X BroxbourneBC BroxbourneCouncil



**Appendix C – QR Code**





## Appendix D – Plan



**Injunction information locations**

S.Bates / L.White Scale: 1: 1,000 Date: 28 May 2025  
Crown Copyright Borough of Broxbourne AC0000807851





## Appendix E – Photographs

Photograph 1 – Location 1

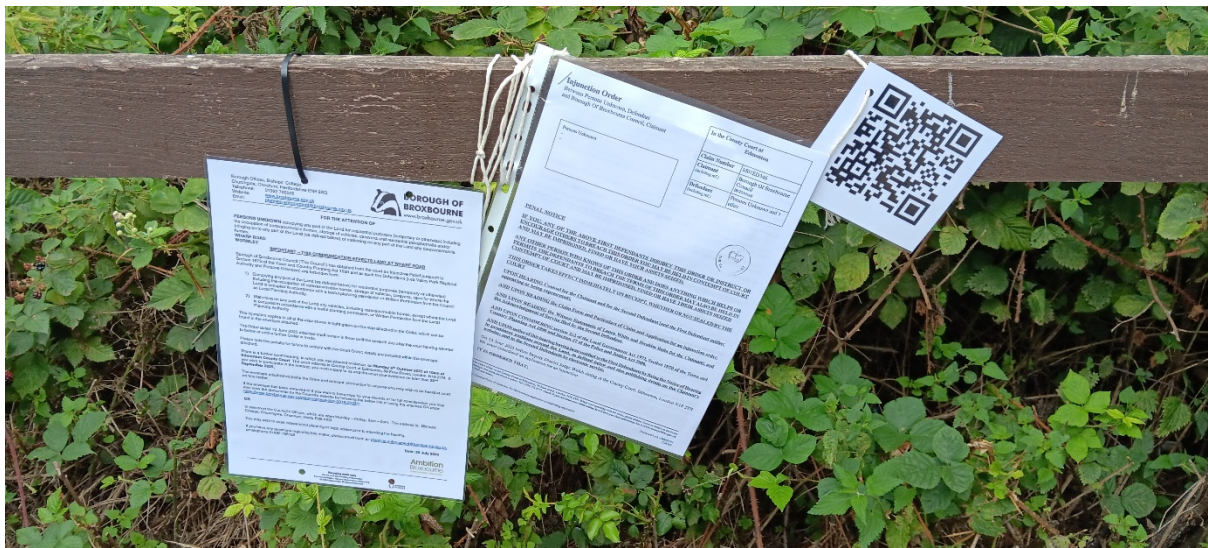


Photograph 2 – Location 1 (wider angle)





Photograph 3 – Location 2



Photograph 4 – Location 2 (wider angle)





Photograph 5 – Location 3



Photograph 6 – Location 4



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**EXHIBIT CRM3**

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Broxbourne Borough Council  
Legal Services  
Bishops' College  
Churchgate  
Cheshunt  
Hertfordshire  
EN8 9XQ







**MLO JT**  
**4 October 2025 08:05**

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**EXHIBIT CRM4**

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