STATUTORY DECLARATION

I, SELIA EVANS, DO SOLEMNLY AND SINCERELY DECLARE as follows:

1. That my full name is [redacted]

2. I was born on 26th December 1974 in West Sussex.

3. I was born into a gypsy family, the Doe's, and led a gypsy way of life from birth until 1999 when my husband and I moved into a house in Durrington. We stayed there for four years and then in July 2003 we moved into a new house at The Farmhouse, Eastergate Lane, Walberton.

4. Previous to that we lived in caravans and moved from place to place. We have lived at Easthampnett WSCC site; land at Angmering; and on grazing land adjacent to the A259 at Angmering bypass.

5. On 12 June 2008 we moved into our current caravan on land at Dragonfly Paddock, Eastergate Lane, Walberton.

6. I live with my husband, Peter Evans, and we have two children: Henry (8) and Tuuli (5) both of whom attend Walberton Primary School.

7. I can confirm that I am an ethnic gypsy and have lived in caravans for the majority of my life.

8. My father's family are ethnic gypsies and my family have lived in the area around Arun for a considerable period of time.

9. I can confirm that I have a horse dealing business. I travel to all of the horse fairs each year - such as Appleby, Towerford, Stow on the Wold and Southall. These trips generally last a couple of weeks as much trading is done before and after the fairs.

10. I accept that between 1999 and 2008 my travelling reduced but this was due to us starting a family. We needed a settled base to bring up our children and it was difficult to continue going to the horse fairs.

11. However in last the four years I resumed travelling to fairs with a colleague [redacted] As she is in Lingfield it is not uncommon for horses that I buy and keep to be kept at her property rather than bring them all the way back to the South coast. Indeed she has some 40 acres of land and 20 stables whilst I now just have one acre although other grazing land is rented locally. I attach at SE1 a letter from Tabatha Pratt dated 31st July 2009 which confirms this working arrangement.

12. This year I have resumed my travel for an economic purpose throughout the period of May to early Autumn and this will continue in future years. In this regard I can confirm that we have

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our own touring caravan which when not in use is stored on site. My husband is a builder my profession and where possible he will travel with me to the horse fairs and seek employment undertaken small construction jobs on our way to and from the horse fairs.

13. I can confirm that I do not intend using the land at Eastergate Lane for any business purposes except for the keeping of horses.

14. I am not aware of any authorised sites which may have vacancies. It is my own experience of southern West Sussex that the need for gypsy sites far exceeds the supply.

15. If I am forced to move off the land at Eastergate Lane, my family will be forced to go on the road and be moved on from place to place by the police. This will not be acceptable with young children and the lack of a settled base would be disruptive to their educational needs.

16. In this respect I attach at SE2 an undated letter from the Headteacher at Walberton & Binstead CE Primary School. This letter confirms that both of our children have settled in well to the local village school.

17. I can confirm that my husband and I have been interviewed by Dr Kalwant Bhopal from the University of Southampton. Dr Bhopal undertakes research on educational achievement, attendance and identity for Gypsy, Traveller and nomadic groups for over a decade. Dr Bhpoal's letter of 25 September 2009 (attached at SE3) confirms:

> *"I can confirm that in my professional opinion Mr and Mrs Evans are Gypsies as defined in Ciruclar 01/2006."*

18. Dr Bhopal goes on to state that:

> *"In my view this* [sic loss of a settled base] *will have devastating effects on the educational experience of their two children .... This could seriously disrupt the children's education."*

19. Finally we have also been interviewed by Martin Myers from the Open University. He is an academic and writer specialising in work that examines the lives of Gypsy, Roma and Travellers living in the UK. In his undated letter which I have attached at SE4 he confirms that he had known my husband and I for some four years, since we responded to a project that he was involved in.

20. In the final paragraph on the first page of his letter he states:

> *"My own observations of the Evans family is that they are very clearly a family who are rooted in the culture, traditions and heritage of English Gypsies."*

21. On page 2 on his letter he concludes:

"..circular 01/2006 gives a very clear definition of those people who should be classes as Gypsies or Travellers and it is apparent that the Evans family fall within the category of such people."

22. Martin Myers also stresses the importance of a settled base for our childrens' educational needs.

AND make this Declaration SOLEMNLY AND SINCERELY
Believing the same to be true by
Virtue of the Statutory Declarations Act 1835.

DECLARED at 141 Elm Grove, Southsea)
In the County of Hants)
This the 5th day of January 2010)



Before me,



A Solicitor/~~Commissioner for Oaths~~.

Andrew Lee White

ARUN DISTRICT COUNCIL WA/1/10/

Re: Dragonfly Paddock, Eastergate Lane,
Walberton.

This is the exhibit marked "SE1" referred to in the Affidavit of SELIA EVANS sworn this 5th day of January ~~2009~~ 2010

Before me,

A. C. Shire.

Solicitor

ARUN DISTRICT COUNCIL WA/1/10/

Miss Tabatha Pratt
Sunhill Farm
Eastbourne Road, Blindley Heath
Lingfield, RH7 6JX

31st July 2009.

Reference, Mrs Selia Evans.

Dear sirs/madam

Over the past several years Selia and I have spent time visiting various horse fairs in different counties across the country.

Through buying and selling horses we have found it mutually benefical in having stabling facilities at both of our properties.

Please do not hesitate to contact me at the above address.

Kind regards



T. Pratt

ARUN DISTRICT COUNCIL WA/1/10/

Re: Dragonfly Paddock, Eastergate Lane,
Walberton.

This is the exhibit marked "SE2" referred to in the Affidavit of SELIA EVANS sworn this 5th day of January ~~2009~~ 2010

Before me

A. L. White

Solicitor

ARUN DISTRICT COUNCIL WA/1/10/

Walberton & Binsted C E Primary School
The Street
Walberton
Arundel
West Sussex
BN18 OPH

Walberton & Binsted
CE School

Headteacher: Miss M Shilliday

Telephone 01243 551398
Facsimile 01243 554594
E-mail: head@walbertonbinsted.w-sussex.sch.uk

To whom it may concern.

Following a meeting with Mrs. Evans regarding their present accommodation she has informed me that there is a possibility that the family may have to relocate.

As Headteacher at Walberton & Binsted CE Primary School I am writing to express my concern that the education of both Henry and Tuuli may be affected by any such relocation.

Henry has been at Walberton & Binsted CE throughout his school life and is a valued member of the school. He is just about to enter Year 4 and I feel to have to possibly move schools at this point would not be beneficial to his learning. He has often found it difficult to focus and concentrate on tasks, but he is now just at the point where he is showing greater motivation, confidence, and pride in his achievements. His self-esteem is growing and to have to move schools now would only serve to negate all his efforts and that of his teachers. He is a sensitive little boy, who benefits from consistency in expectations and teaching approaches. He has developed a secure circle of friends, which is important to him, and he thrives on knowing that his efforts are valued, that he is achieving, and that he is pleasing his teachers here. We would be very sorry to lose him if circumstances regarding accommodation cannot be resolved.

Tuuli has just completed her first year at school in our Reception Class. To have to move on after such a short period of time when she has settled so well and made such a good start to her education would again be disappointing.

In conclusion, the Evans family are very much a part of our school. The parents are supportive of their children's learning and of the values and policies of the school. I trust that matters relating to their accommodation can be resolved so that the family can remain with us.

Yours sincerely,

M.Shilliday, Headteacher

ARUN DISTRICT COUNCIL WA/1/10/

Re: Dragonfly Paddock, Eastergate Lane,
Walberton.

This is the exhibit marked "SE3" referred to in the Affidavit of SELIA EVANS sworn this 5th day of January ~~2009~~ 2010

Before me

A Commissioner for Oaths

ARUN DISTRICT COUNCIL WA/1/10/

UNIVERSITY OF
Southampton
School of Education

Mr and Mrs Evans
Dragonfly Paddock
Eastergate Lane
Walberton
Arundel
West Sussex

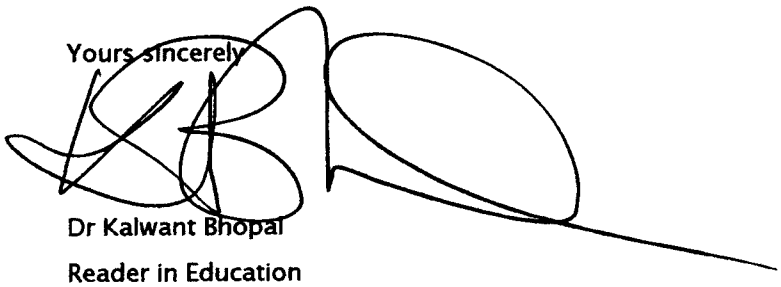
25 September 2009

To whom it may concern

I am a senior academic working on issues of social justice and inclusion for minority ethnic groups in education at the University of Southampton. I have been researching the area of educational achievement, attendance and identity for Gypsy, Traveller and nomadic groups for over a decade. I have published several reports for the DfES, articles and books on social justice. I was recently contacted by Mr and Mrs Evans who were participants in a research project which I directed examining the social exclusion and marginalisation experienced by Gypsies and Travellers in schools. I can confirm that in my professional opinion Mr and Mrs are Gypsies as defined in Circular 01/2006. I was very disturbed to learn that they have been told they may be evicted from their home, should their planning application be rejected. In my view, this will have devastating effects on the educational experience of their two children who attend the local primary school. If the family are moved, this could seriously disrupt the children's education and may result in the children no longer receiving any education. In my opinion the children are settled in school and are achieving well. The family have been accepted as members of the school and local community. They have established secure and positive relationships both inside and outside of the school. A move at this stage would have significant impacts on the future achievement of their children. I urge the relevant parties to think seriously about the implications this move would have. Under the *Every Child Matters* agenda, all children are entitled and have a *right* to education, regardless of their personal, social or economic circumstances or whether they are housed or not.

I would be very happy to discuss this with you, please see contact details below.

Yours sincerely



Dr Kalwant Bhopal
Reader in Education
Director of the Pedagogy and Curriculum Research Centre
Direct tel: +44 (0)23 8059 3464
email: K.Bhopal@soton.ac.uk

School of Education, University of Southampton, Highfield Campus, Southampton SO17 1BJ United Kingdom
Tel: +44 (0)23 80593475 Fax: +44 (0)23 80593556 www.education.soton.ac.uk

ARUN DISTRICT COUNCIL WA/1/10/

Re: Dragonfly Paddock, Eastergate Lane,
Walberton.

This is the exhibit marked "SE4" referred to in the Affidavit of SELIA EVANS sworn this 5th day of January ~~2009~~ 2010

Before me

A. C. Wilson

Solicitor

ARUN DISTRICT COUNCIL WA/1/10/

Department of Sociology
The Open University
Milton Keynes MK7 6AA

Tel: +44 (0)1908 654457
Mobile: 0796 2022380
M.Myers@open.ac.uk

The Open University

To Whom It May Concern

Re: The Evans Family, Dragonfly Paddock, Eastergate Lane, Walberton, West Sussex

I am an academic and writer specialising in work that examines the lives of Gypsy, Roma and Travellers living in the UK. In the past five years I have worked as a researcher for Goldsmiths College, University of London, the University of Greenwich and the University of Southampton. I have worked on projects looking at Gypsy, Roma and Traveller families and their experiences of education funded by many local authority education authorities including Greenwich, Hampshire and West Sussex. I am the co-author (with Kalwant Bhopal) of *Insiders, Outsiders and Others: Gypsies and Identity*, this book published in 2008 was the first academic account to situate British Gypsy identity in relation to non-Gypsy culture and social life. I have published a number of articles in refereed academic journals including the *International Journal of Inclusive Education*, the *British Journal of Educational Studies* and *Race, Ethnicity and Education*. Currently I am based at the Open University working on a project that looks at relations between Gypsy families and their non-Gypsy neighbours.

I have known Mr and Mrs Evans and their family for 4 years in both a professional capacity (they were respondents in a project that I was involved in), and, on a personal basis (our children all attend the same primary school and we have sons in the same year group). Within academic discourses although Gypsy identity is a contested concept, (in the same way that British or American identity are not simple or neat categories), it is also one in which most writers have adopted a broad consensus of what is distinct about Gypsy culture and ethnicity. So in very broad terms Gypsies in Britain are linked to diasporic migration of people from the North of India, across the Middle East and into Europe some 1000 years ago and who first arrived in the UK in the fifteenth and sixteenth centuries; Gypsy culture in the UK retains an attachment to nomadism that whilst it may not be apparent within the practicalities of individuals lives in the twenty-first century remains a well-understood cultural signifier; there are attachments to the Romany language which again in the twenty-first century may be understood or used to a greater or lesser degree; self-employment is generally regarded as an important cultural indicator often within particular fields such as trading in horses; and, the importance of strong family and community bonds remains an enduring trait.

In my own work I have interviewed families from many diverse backgrounds with often very different connections to what would be described as a Gypsy heritage or background. Specifically these would include families from English and Scottish Gypsy backgrounds, Irish Travellers, Travelling Showmen and New Age Travellers. My own observations of the Evans family is that they are very clearly a family who are rooted in the culture, traditions and heritage of English Gypsies. Their direct and extended family members are English Gypsies. They have well-established connections with

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different Gypsy communities in Sussex and along the south coast and these remain an important element in the family's social world and employment networks, in particular Mrs Evans work as a horse trader. Talking to the Evans family one would be struck by the importance given over to recognising the place Gypsy culture and heritage has within their family history. The Office of the Deputy Prime Minister (ODPM) circular 01/2006 gives a very clear definition of those people who should be classed as Gypsies or Travellers and it is apparent that the Evans family fall within the category of such people. Their temporary current position requires them to consider the educational needs of their children, and to quite rightly interrupt their more nomadic lifestyle in order to provide a safe and secure environment in which their children can attend school regularly. ODPM Circular 01/2006 clearly recognises that circumstances such as the importance of providing for children's education require planning authorities to view sympathetically the needs of Gypsy and Traveller families to find a suitable location to live.

Beyond the very obvious upheaval to the entire family that would result if the Evans were not allowed to remain in their current accommodation there is the very pressing need to consider the immediate impact such upheaval would have on the educational needs of the Evans' two children. There have been longstanding concerns (since the publication of the Plowden Report in 1967) about the failure of an education system designed around the needs of a sedentary population to engage with Gypsy communities. Since Plowden there has been a consistent stream of Government reports identifying factors that have made it often very hard for children from Gypsy backgrounds to receive an adequate education; and, amongst these factors one of the most disruptive is the impact of sudden upheavals to home life such as evictions. In the Evans case the family have two children who are well established at their local school and they are a family who are clearly a part of the school community. They are parents (like many other Gypsy and non-Gypsy parents) who recognise the importance of ensuring their children receive all the benefits that accrue from attending school and who give their children every support to ensure that have a comfortable and happy school life. In this respect it would be a very great shame to see any disruption to this family that threatened the continued schooling of their children. In addition to the immediate difficulties that the children would face if they found themselves unable to maintain regular attendance patterns at one school, there is an abundance of evidence confirming the dangers faced by Gypsy and Traveller children who find themselves travelling from one temporary location to another.

I am happy to discuss any of the issues raised about this matter further.



Martin Myers