



Claim Form (CPR Part 8)

In the HIGH COURT OF JUSTICE KINGS BENCH DIVISION	
Claim no.	
Fee Account no.	
Help with Fees - Ref no. (if applicable)	H W F - - - - -

Claimant
CANTERBURY CITY COUNCIL



KB-2026-001835

Defendant(s)
(1) JOHN LLOYD

(2) ADELINE READING

(2) PERSONS UNKNOWN, BEING ANY PERSON OTHER THAN THE NAMED DEFENDANTS WHO INTENDS TO TAKE ANY OF THE STEPS PROHIBITED BY THE ORDER (EITHER BY THEMSELVES OR BY ASKING OR INSTRUCTING OR ALLOWING OR CONTRACTING ANOTHER PERSON)

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

Details of claim (see also overleaf)

Claim for a injunction under section 187B of the Town and Country Planning Act 1990 (with both restraining and mandatory elements) to restrain and remedy breaches of planning control for the reasons set out in the witness evidence and the Details of Claim.

The Claimant also seeks an Order for alternative service pursuant to CPR 6.14, 6.15, 6.26 and 6.27. The Claimant also seeks its costs.

Defendant's
name and
address

(1) JOHN LLOYD, Land at Three Acres,
Maypole Road, Hoath, Kent, CT3 4LN

(2) ADELINE READING, Land at Three
Acres, Maypole Road, Hoath, Kent, CT3
4LN

(3) PERSONS UNKNOWN

	£
Court fee	646
Legal representative's costs	
Issue date	

Claim no.	
------------------	--

Details of claim (continued)

See Details of Claim

CANTERBURY CITY COUNCIL
14 Rose Lane, Canterbury, Kent, CT1 2UR, England

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

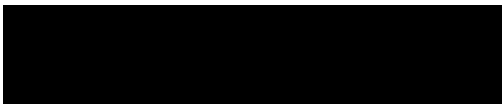
Statement of Truth

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.

☐ I **believe** that the facts stated in these particulars of claim are true.

☒ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

21

Month

5

Year

2026

Full name

Peter William Kee

Name of claimant's legal representative's firm

Inhouse legal services Canterbury City Council

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

Principal Lawyer

Application notice

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

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court High Court KBD Division	Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)
PBA 008 7266	H W F - -
Warrant no. (if applicable)	
Claimant's name (including ref.) CANTERBURY CITY COUNCIL	
Defendant's name (including ref.) (1) JOHN LLOYD (2) ADELINE READING (3) PERSONS UNKNOWN	
Date	22 May 2026



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

CANTERBURY CITY COUNCIL

KB-2026-001835

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

If you are a legal representative whom do you represent?

CANTERBURY CITY COUNCIL

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

The Claimant seeks an interim injunction under s.187B of the Town and Country Planning Act 1990 to prevent breaches of planning control for the reasons set out in the witness evidence. The Claimant seeks permission for the hearing to take place with insufficient notice to the Defendants. The Claimant also seeks an order for alternative service.

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?

High Court Judge

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.

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.

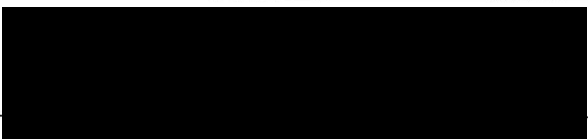
☒ No

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

2 2

Month

5

Year

2 0 2 6

Full name

Peter William Kee

Name of applicant's legal representative's firm

Inhouse legal services Canterbury City Council

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

Principal Lawyer

Applicant's address to which documents should be sent.

Building and street

Council Offices

Second line of address

14 Rose Lane

Town or city

Canterbury

County (optional)

Kent

Postcode

C	T	1		2	U	R
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If applicable

Phone number

[REDACTED]

Fax phone number

na

DX number

na

Your Ref.

PWK/CW/23064

Email

[REDACTED]

IN THE HIGH COURT OF JUSTICE

Claim No. [REDACTED]

KING'S BENCH DIVISION

IN THE ROYAL COURTS OF JUSTICE

IN THE MATTER OF AN INJUNCTION PURSUANT TO SECTION 187B

OF THE TOWN AND COUNTRY PLANNING ACT 1990

B E T W E E N: -

CANTERBURY CITY COUNCIL

Claimant

- and -

(1) JOHN LLOYD

(2) ADELINE READING

(3) PERSONS UNKNOWN, BEING ANY PERSON OTHER THAN THE NAMED DEFENDANTS WHO INTENDS TO TAKE ANY OF THE STEPS PROHIBITED BY THE ORDER BELOW (EITHER BY THEMSELVES OR BY ASKING OR INSTRUCTING OR ALLOWING OR CONTRACTING ANOTHER PERSON)

Defendants

Note of Hearing

Before the hearing the Claimant's solicitors called the First Defendant, Mr Lloyd, at 14:14pm on 22 May 2026. He asked that the Judge was told the following:

He has asked that the Judge is told the following

This place is for me and family going to live [REDACTED]

Place we want to stay

It's no-on else's land

I've lived round all my life and want settle down and make it my own and have a stable life

[REDACTED]

The application was called on at 14:45pm on 22 May 2026.

Before the Honourable Mr Dexter Dias.

J: Ms Rowland

ER: Yes, my lord, this is an application for an interim injunction under s.187B of the Town and Country Planning Act. I represent Canterbury City Council. The Defendants are John Lloyd, Adeline Reading, and Persons Unknown. This is an application without notice. My solicitors at 14:14pm rang the Defendant and were able to get through to him and let him know of the hearing. I have what he said. I can give it to you and can read it. But to start, I can ask if you have had a chance to read in.

J: I have read the draft order and plus I looked at the statement of solicitors in the case.

ER: Do you mean Ian Farrow, the planning enforcement officer?

J: Yes

ER: There would have also been a detail of claim have you had the chance to read?

J: Yes- I would like to know what Mr Lloyd said.

ER: Yes, he informs the court, and this is me reading from email:

[REDACTED]

Place we want to stay

It's no-on else's land

I've lived round all my life and want settle down and make it my own and have a stable life

[REDACTED]

ER: That is all I have in the email indication as to what he has said about this application.

J: Right, let's take it in stages. Thank you for attending court at such short notice. The court is grateful. It looks like the previous work was done at what date?

ER: It took place last bank holiday.

J: Yes- but what is precisely the latest work authorised without permission, what date?

ER: Between 6th of May and 8th of May. A site visit was taken, and there was a caravan on site, but there was no one present on the 6th. When they attended on the 8th they were in the caravan and said that they had moved in and so there was a material change of use between the 6th and 8th May as far as the Council are aware.

J: In terms of material changes, what was the date?

ER: The last physical development would be between the 1st May and 6th – I am unable to obtain the exact date.

J: But the last date possible is the 6th is that right?

ER: Yes, there have been no identified changes, but having said that, the photographs taken by officers yesterday show that some additional materials were brought on, which appear to be outdoor seating, which are at tab 20- pg. 122. In the top two photographs, you can see black solid outdoor seating. If you go back to page 118, you can see nothing of the sort on the land. In my submission, that shows applicants who are planning to stay on the land and looking to undertake further work.

J: those are two separate things; what it appears Mr Lloyd said is that he wants to stay- you say an inference that there will be further development?

ER: Yes, the main evidence is that a planning application was submitted on 30 January 2026 for 3 plots on exact same site, this was refused on 2nd April, and this development was commenced on the bank holiday in May. The intention was for more plots, no indication has been given what those plots, or how his intention is to use this land, or how he will continue to do so. I appreciate that it is your point about 6th.

J: Yes there are two points I need your assistance on. First yes, as you already pointed out, but secondly, why is it you notified today? What the effect is, is that Mr Lloyd doesn't have

adequate opportunity to make submissions to the court. Given that the last date is the 6th- why is it have you waited until the 22nd May to make this application?

ER: The concern is that the bank holiday would be the target weekend. This is when the anticipated development would take place.

J: When did that concern take place?

ER: in the immediate past- during this week, if not the end of last week.

J: Why didn't you make the application then? The last Bank Holiday something happened without permission, it is likely that something else could happen, but why is it that you waited till last afternoon to come in front of the court?

ER: We acted as quickly as we could in circumstances with all the information.

J: If the Council had a concern, they could have made an application earlier that would have given the Defendant a chance to be heard?

ER: An effort was made last night, and why we are here this afternoon. I appreciate the concern coming in late. It doesn't avoid the concern that development will take place at the weekend, and the prejudice is low, the Council is not asking for an order to leave the land, it is an order to stop further people coming on.

J: That is a different issue. Why is it that Mr Lloyd has effectively been deprived of the opportunity to be in front of the court, which is departure from article 6 rights. You could have served him and given it in time?

ER: The Council acted as quickly as it could.

J: How did you do that- you could have filed it after the weekend?

ER: it takes time to instruct counsel- to prepare a witness statement with all the relevant material. The Council has tried to give informal notice. It was aware of the risk of letting him know yesterday that there would be an injunction hearing and for him to start development in the circumstances.

J: you haven't given him an opportunity to be heard.

ER: I disagree, we have had some opportunity.

J: Do you say that is sufficient?

ER: In the circumstances that we are in, yes. We only received notification of the hearing minutes before 2pm. Had notice been given before the council knew hearing was taking place, Mr Lloyd would have had an opportunity to undertake development.

J: This reinforces the point - that the application should have been made earlier this week

ER: It was made as soon as the council could. While Mr Lloyd hasn't been able to come here today, an answer to this would be a short return date.

J: What do you suggest

ER: Tuesday- he has sufficient time to have his case heard. That would strike an appropriate balance in circumstances where he clearly wants to say something to the Judge, but it means an interim injunction in place over bank holiday where he has previously taken advantage where officers on leave, and conduct further development in that time.

J: You persuade me. You understand that the court has a duty to ask those questions, and you are seeking an contra mundum injunction.

ER: I know you have indicated you agree but a contra mundum injunction is for persons unknown would always be without notice, and the Mr Lloyd is in a different position to persons unknown.

J: At the forefront of my mind is the comments in Wolverhampton.

ER: yes.

The Judge and ER reviewed the draft order.

The Return date was set as 27 May 2026.

Kate Tidmarsh

22 May 2026

Claim No: [REDACTED]

Made on behalf of Claimant
I Farrow
2nd w/s
Exhibits IF/11 to IF/15
26th May 2026

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BETWEEN:-

CANTERBURY CITY COUNCIL

Claimant

and

(1) JOHN JAMES LLOYD
(2) ADELINE READING
(3) PERSONS UNKNOWN

Defendants

**SECOND WITNESS STATEMENT OF IAN FARROW
ON BEHALF OF THE CLAIMANT**

I, Ian Farrow of Canterbury City Council, 14 Rose Lane, Canterbury, Kent, CT1 2ST state as follows:

- 1) I am making this witness statement on behalf of the Claimant, in support of its application for Interim injunction against the Defendants pursuant of Section 187B of the Town and Country Planning Act 1990 ("the Act").
- 2) I am employed by the Claimant as the Deputy Planning Enforcement Manager (Development Management) and have held this position since January 2025. I have been working for the Council for over 10 years as a planning professional. I have worked as a Planning Officer in Local Government for over 10 years.
- 3) This witness statement relates to land known as 'Land at Three Acres, Maypole Road, Hoath, Kent, CT3 4LN' ("the Land"), this is furtherance to my statement dated 21st May 2026.
- 4) Canterbury City Council is the Local Planning Authority (the Council/LPA) within the meaning of the Act for an area including the Land. I make this witness statement in

support of the Claimant's application for an injunction.

Chronology of Investigation & Events

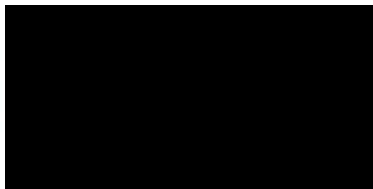
- 5) On 23rd May 2026, an email was received by the Council from the Process Server, namely Tony Gaskin from Kent Legal, UK & International Process Servers. A copy of the email I now produce as **Exhibit IF-11**. Attached to this email was a N215 certificate of service which I now produce as **Exhibit IF-12**.
- 6) On 23rd May 2026, several emails were received by the Council from the Process Server, Tony Gaskin, a copy of which I now produce as **Exhibit- IF-13**. I also produce copies of the photos of service dated 23-05-26 as **Exhibit – IF-14**.
- 7) On 26th May 2026, Council Officer, Luke Doorman visited 'the land' at 'Three Acres, Maypole Road, Hoath Kent, CT3 4LN. The Officer confirmed that there has been no change to 'the land' since the serving of the Interim Injunction on the 23rd May 2026, and that nobody appeared to be on 'the land' during the site visit. Photos taken during the site visit I now produce as **Exhibit IF-15**

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."

I am duly authorised to make this Statement on behalf of the Claimant.

Signed:

A large black rectangular box redacting the signature of the claimant.

Canterbury City Council

Dated: 26th May 2026

Claimant
I Farrow
Second
Exhibit IF11
26/05/2026

CLAIM NO: [REDACTED]

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

BETWEEN :-

CANTERBURY CITY COUNCIL

Claimant

-and-

**(1) JOHN JAMES LLOYD
(2) ADELINE READING
(3) PERSONS UNKNOWN**

Defendants

EXHIBIT "IF11"

Head of Legal Services
Canterbury City Council
14 Rose Lane
Canterbury Kent CT1 2UR

Solicitor for the Claimant

Re: Three Acres, Maypole Road, Hoath - ...

Re: Three Acres, Maypole Road, Hoath - Service of Order this afternoon

[REDACTED]



Sat 2026-05-23 09:23



Some content in this message has been blocked because the sender isn't in your Safe senders list.



N215_certificate of service.LLOY...
574 KB

Simon.

this was served at 06:30 this morning.

N215 attached met with Mr Lloyd at property.

Kind Regards

Tony

Kent Legal

Innovation Centre Medway | Maidstone Road | Chatham | Kent | ME5 9FD

www.kentlegal.co.uk

[REDACTED]

[Empty rectangular box]

Claimant
I Farrow
Second
Exhibit IF12
26/05/2026

CLAIM NO: [REDACTED]

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

BETWEEN :-

CANTERBURY CITY COUNCIL

Claimant

-and-

**(1) JOHN JAMES LLOYD
(2) ADELINE READING
(3) PERSONS UNKNOWN**

Defendants

EXHIBIT "IF12"

Head of Legal Services
Canterbury City Council
14 Rose Lane
Canterbury Kent CT1 2UR

Solicitor for the Claimant



HM Courts & Tribunals Service

N215

Certificate of service

Name of court

HIGH COURT KB DIVISON

Claim number

Name of claimant (including any reference)

CANTERBURY CITY COUNCIL

Name of defendant (including any reference)

JOHN LLOYD, ADELINE READING
PERSONS UNKNOWN

1. On what day did you serve?

Day Month Year

2	3	0	5	2	0	2	6
---	---	---	---	---	---	---	---

2. The date of service is

Day Month Year

2	3	0	5	2	0	2	6
---	---	---	---	---	---	---	---

Note 2: See page 5 for calculating the deemed date of service.

3. What documents did you serve?

Interim Injunction order, Details of claim, Application and supporting documents / Witness statements

Note 3: Attach copies of the documents you have not already filed with the court.

4. On whom did you serve?

JOHN LLOYD

Note 4: If appropriate include their position, such as partner or director.

5. How did you serve the documents? (tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☒ by delivering to or leaving at a permitted place

☒ by personally handing it to or leaving it with

Name of person

JOHN LLOYD

Time left, where document is other than a claim form

06:30am

☒ by other means permitted by the court (please specify)

copies attached to fence and gate

☐ by Document Exchange

☐ by fax machine

Time sent, where document is other than a claim form

☐ by other electronic means (please specify)

Time send, where document is other than a claim form

Fax machine: you may want to enclose a copy of the transmission sheet.

6. Give the address where service effected, include fax or DX number, e-mail address or other electronic identification.

First line of address

Three Acres,

Second line of address

Maypole Road

Town or city

Hoath

County (optional)

Kent

Postcode

C	T	3		4	L	N
---	---	---	--	---	---	---

DX number

Fax number

Email address

Other electronic identification

Being the

- ☐ claimant's
☒ defendant's
☐ solicitor's
☐ litigation friend

Location

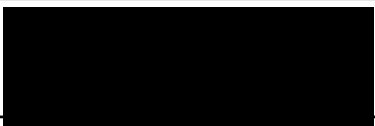
- ☒ usual residence
☒ last known residence
☐ place of business
☐ principal place of business
☐ last known place of business
☐ last known principal place of business
☐ principal office of the partnership
☐ principal office of the corporation
☐ principal office of the company
☐ place of business of the partnership/company/corporation
within the jurisdiction with a connection to claim
☐ other (please specify)

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 this section and any continuation sheets are true.

Signature



- ☐ Claimant
- ☐ Defendant
- ☐ Litigation friend
(where judgment creditor is a child or a protected party)
- ☒ Claimant's legal representative (as defined by CPR 2.3(1))
- ☐ Defendant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
23	05	2026

Full name

Name of legal representative's firm

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

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day.
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day.
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day.
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted.
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent.
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day.

In this context ‘business day’ means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Claimant
I Farrow
Second
Exhibit IF13
26/05/2026

CLAIM NO: [REDACTED]

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

BETWEEN :-

CANTERBURY CITY COUNCIL

Claimant

-and-

**(1) JOHN JAMES LLOYD
(2) ADELINE READING
(3) PERSONS UNKNOWN**

Defendants

EXHIBIT "IF13"

Head of Legal Services
Canterbury City Council
14 Rose Lane
Canterbury Kent CT1 2UR

Solicitor for the Claimant

Fw: Three Acres, Maypole Road, Hoath - Service of Order this afternoon

[REDACTED]

Date: Sat 2026-05-23 12:52

[REDACTED]

[REDACTED]

Sent: 23 May 2026 12:00

[REDACTED]

Subject: Re: Three Acres, Maypole Road, Hoath - Service of Order this afternoon

[REDACTED]











Kind Regards

Kent Legal

Innovation Centre Medway | Maidstone Road | Chatham | Kent | ME5 9FD

www.kentlegal.co.uk

Tel: 01634 568858

CLAIM NO [REDACTED]

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

BETWEEN :-

CANTERBURY CITY COUNCIL

Claimant

-and-

**(1) JOHN JAMES LLOYD
(2) ADELINE READING
(3) PERSONS UNKNOWN**

Defendants

EXHIBIT "IF14"

Head of Legal Services
Canterbury City Council
14 Rose Lane
Canterbury Kent CT1 2UR

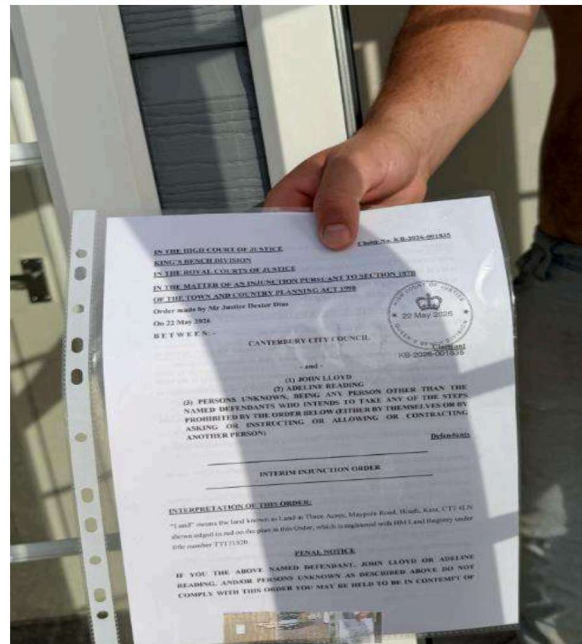
Solicitor for the Claimant

Exhibit – IF-14

PHOTOS – dated 23-05-26

Certificate of Service

Photos provided by process server; Tony Gaskin, Kent legal o 23-05-26



CLAIM NO: [REDACTED]

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

BETWEEN :-

CANTERBURY CITY COUNCIL

Claimant

-and-

**(1) JOHN JAMES LLOYD
(2) ADELINE READING
(3) PERSONS UNKNOWN**

Defendants

EXHIBIT "IF15"

Head of Legal Services
Canterbury City Council
14 Rose Lane
Canterbury Kent CT1 2UR

Solicitor for the Claimant

Exhibit – IF-15

PHOTOS – Site Visit

Dated - 26-05-26 - 11:50hrs

The Officer confirmed that there has been no change to ‘the land’ since the serving of the Interim Injunction on the 23rd May 2026 and that nobody appeared to be on ‘the land’ during the site visit.

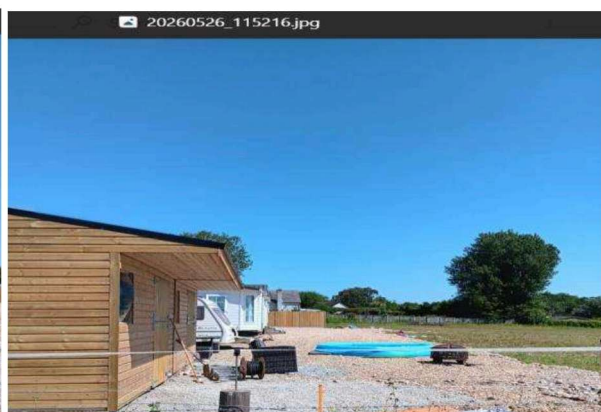
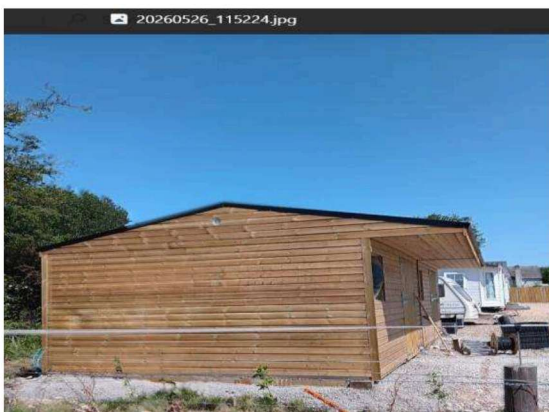
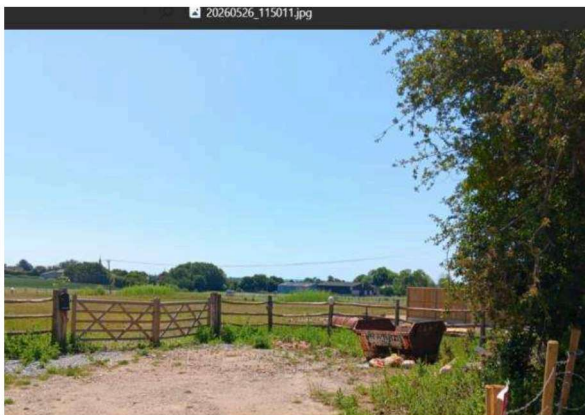
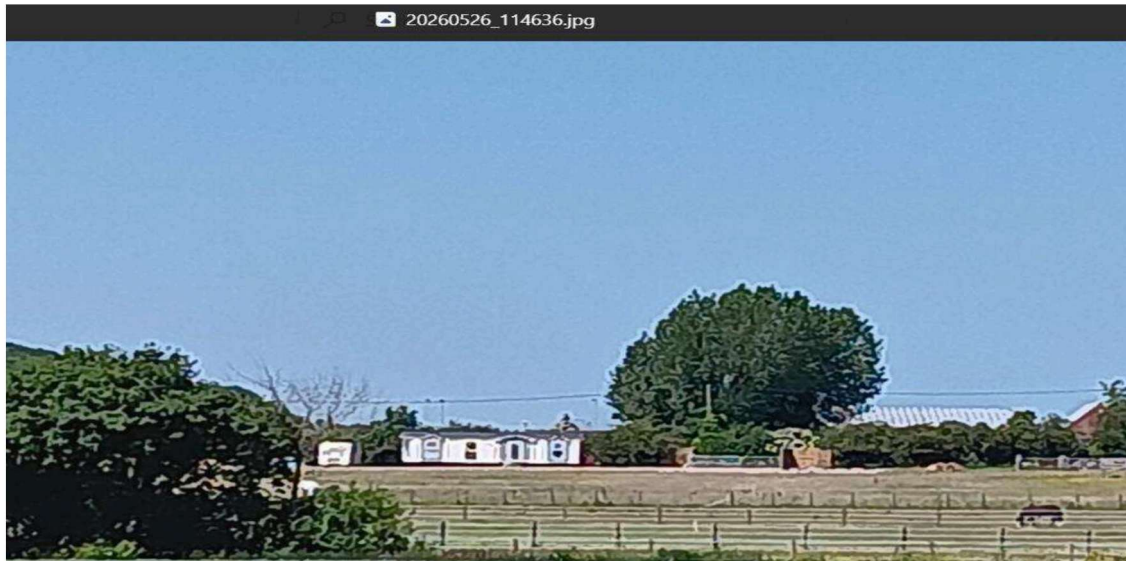


Exhibit – IF-15

PHOTOS – Site Visit

Dated - 26-05-26 - 11:50hrs