

Claim No: KB-2026-001835

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

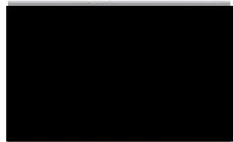
- 5) On 23rd May 2026, an email was received by the Council from the Process Server, namely Tony Gaskin from Kent Legal, UK & International Process Servers. A copy of the email I now produce as **Exhibit IF-11**. Attached to this email was a N215 certificate of service which I now produce as **Exhibit 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 black rectangular box used to redact the signature of the authorized person.

Canterbury City Council

Dated: 26th May 2026

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KING'S BENCH DIVISION

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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

KL



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

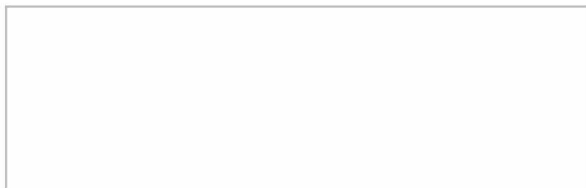
Kent Legal

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

www.kentlegal.co.uk

Tel: 01634 568858

Email: info@kentlegal.co.uk



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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

KB-2026-001835

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.

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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]

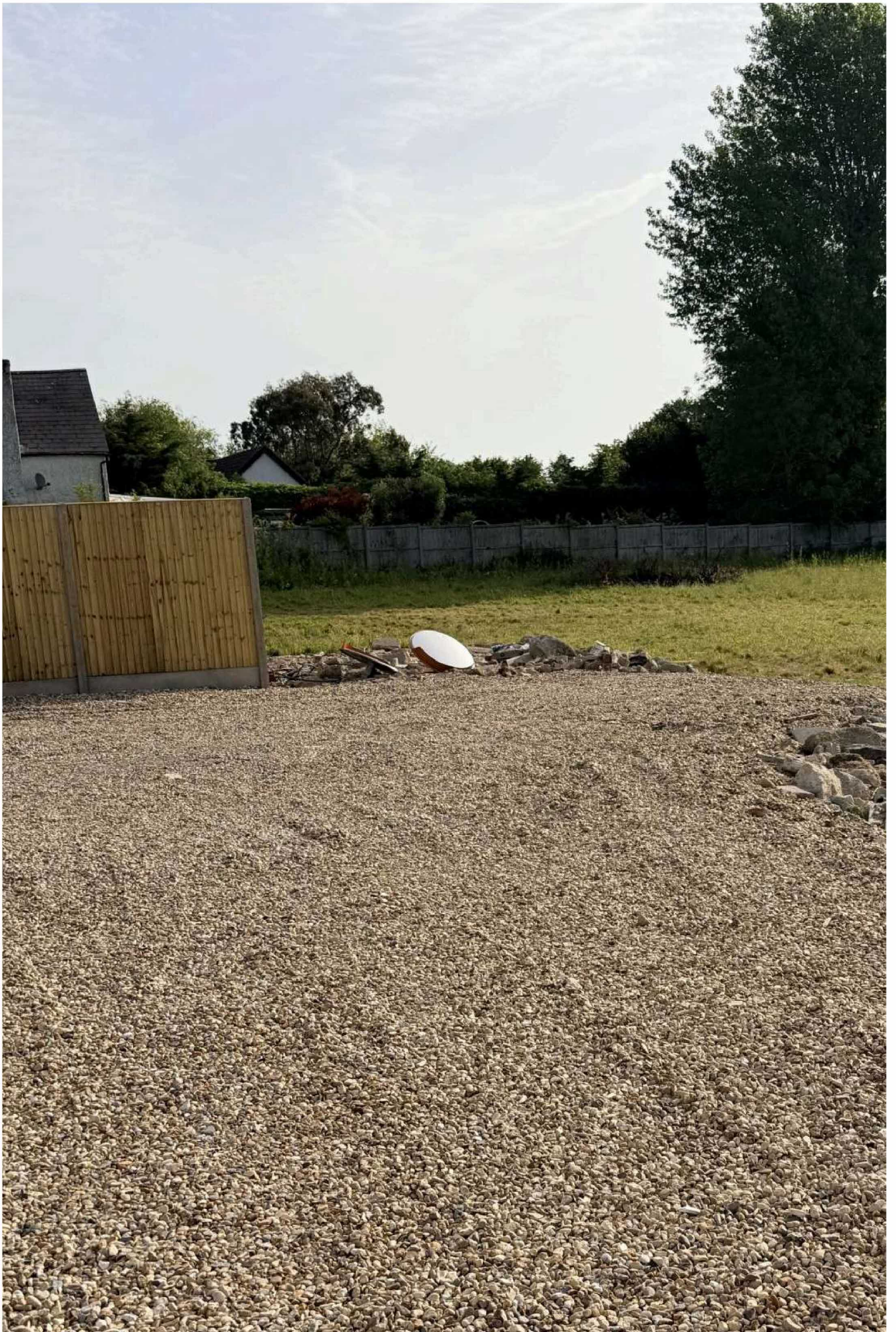
[REDACTED]

Sent: 23 May 2026 12:00

[REDACTED]

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

--Email From External Account--











Kind Regards

Kent Legal

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

www.kentlegal.co.uk

Tel: 01634 568858

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EXHIBIT "IF14"

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

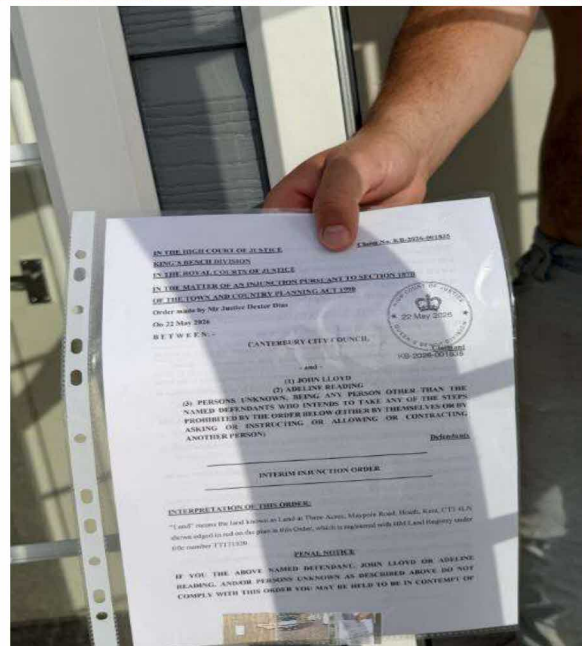
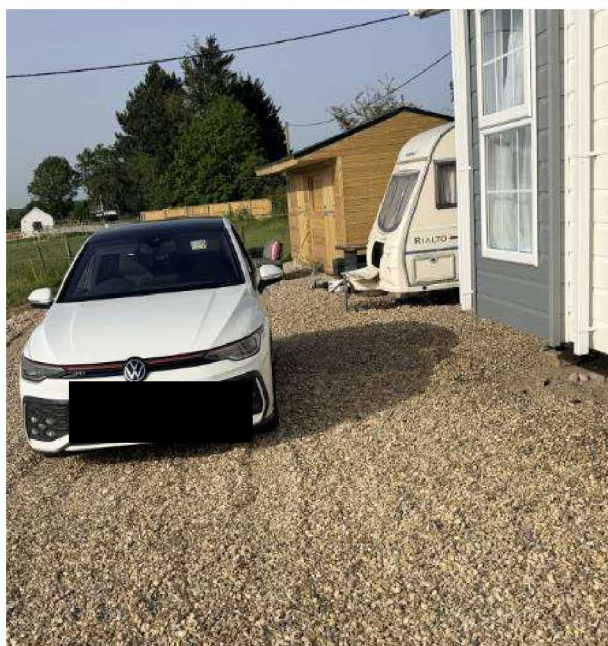
Solicitor for the Claimant

Exhibit – IF-14

PHOTOS – dated 23-05-26

Certificate of Service

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



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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.

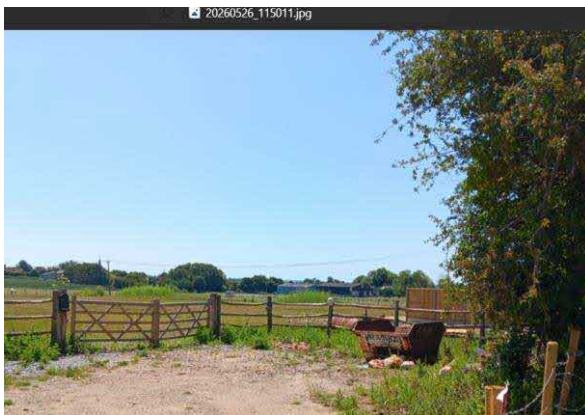
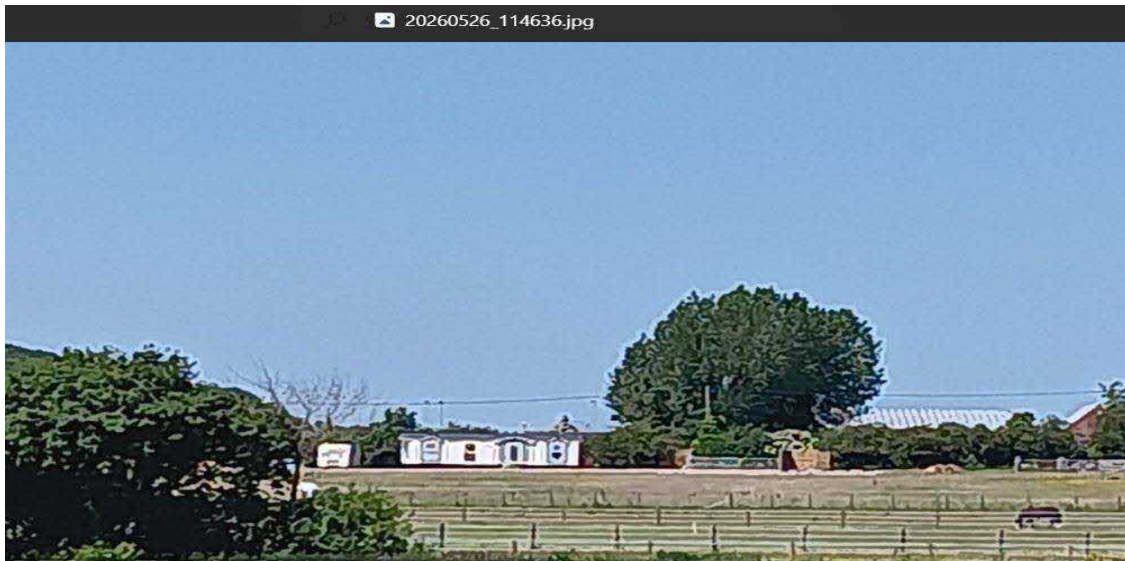


Exhibit – IF-15

PHOTOS – Site Visit

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