



Claim Form (CPR Part 8)

In the County Court sitting at Canterbury

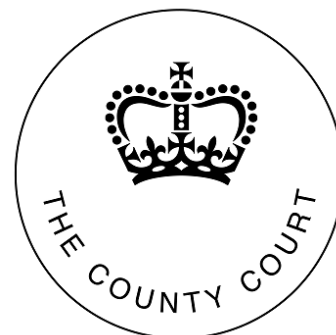
Claim No. J00CT718

Fee Account no.

Help with Fees –
Ref no. (if
applicable)

H W F - - - - -

Claimant
The District Council of Folkestone and Hythe
Civic Centre
Castle Hill Avenue
Folkestone
Kent, CT20 2QY



Defendant(s)

- (1) RICHARD WOOD
- (2) ALBERT AMOS MOBEY
- (3) AMOS BILL MOBEY
- (4) PERSONS UNKNOWN BRINGING CARAVANS ONTO AND OCCUPYING LAND

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

Details of claim (*see also overleaf*)

Pursuant to Section 187B of the Town and Country Planning Act 1990 and in accordance with CPR 25 the Claimant seeks an injunction against the Defendants who it is considered are responsible for an actual breach of planning control on land at Canterbury Road, Selsted, Dover, CT15 7HL

Please see enclosed the following
Witness statement of Clive Satchell
Form N16A Application for an Injunction
Draft Injunction Order

Defendant's
name and
address

Richard Wood of Kingsthorpe Farm, Magpie
Hall Road, Stubbs Cross, Ashford, Kent TN26
1HG

Albert Amos Mobey of Woodlands, Coombe
Walk, Yorkletts, Whitstable CT5 3AL

Amos Bill Mobey of Woodlands, Coombe
Walk, Yorkletts, Whitstable CT5 3AL

Persons Unknown

Land adjoining the Cottage, Canterbury Road,
Selsted, Kent

Court fee	£332
Legal representative's costs	
Issue date	22 July 2022

For further details of
When corresponding, please refer to the claim number and always quote the claim number.

Claim no.	
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Details of claim *(continued)*

The Claimant is the Local Planning Authority as defined by section 1 of the Town and Country Planning Act 1990. The Defendants are the freehold owners of land at Canterbury Road, Selsted, Dover, Kent and Persons Unknown.

The Claimant has statutory functions in respect of breaches of planning control within its administrative area and the power to apply for injunctions restraining actual or apprehended breaches of planning control when it considers it necessary or expedient to do so.

Actual breaches of planning control have occurred on the land subject to this application. An existing order protecting the land was granted on 30 July 2020 and is to expire on 1 August 2022.

The land is under new ownership since the earlier order was granted. The Claimant now seeks an order against the new owners and persons unknown protecting the land for a further two years or until such time as planning permission is granted for its lawful development.

Statement of Truth

* ~~(I believe)~~ (The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement

Full name Tim Hxion

Name of claimant's legal representative's firm Legal Services Folkestone and Hythe District Council

signed 

*(For and on behalf of the Claimant) ~~(Litigation friend)~~
~~(Claimant's legal representative)~~

position or office held: Legal Specialist
(if signing on behalf of firm or company)

**delete as appropriate*

Legal Services
The District Council of Folkestone and Hythe
Civic Centre
Castle Hill Avenue
Folkestone
Kent, CT20 2QY

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.

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](https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter)