

BETWEEN:

THE DISTRICT COUNCIL OF FOLKESTONE AND HYTHE

Claimant

-and-

(1) RICHARD WOOD
(2) ALBERT AMOS MOBEY
(3) AMOS BILL MOBEY
(4) PERSONS UNKNOWN

Defendants

EXHIBIT BUNDLE



Exhibit Number	Description	Page Numbers
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Injunction Order

Between Mr Stephen Frederick Cork, Defendant
and The District Council Of Folkestone & Hythe, Claimant

The District Council Of Folkestone & Hythe
Civic Centre
Castle Hill Avenue
Folkestone
Kent
CT20 2QY

In the County Court at
Canterbury

Claim Number G00CT467

Claimant
(including ref.) The District Council Of
Folkestone & Hythe

Defendant
(including ref.) Mr Stephen Frederick
Cork and 3 others



PENAL NOTICE

IF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS PERSONS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

Before Deputy District Judge Lal sitting on 30 July 2020 at the County Court at Canterbury, The Law Courts, Chaucer Road, Canterbury, Kent CT1 1ZA

UPON hearing Counsel for the Claimant and the First and Second Defendants in person by telephone

UPON the Court being satisfied that the claim was properly served

UPON the Claimant indicating that it intends to issue an enforcement notice in respect of the Land

UPON it being apparent that part of the Land has been sold by the Second Defendant to Mr James Robson Ransley since the interim injunction was granted

IT IS ORDERED:

1. Until 1 August 2022, the Defendants shall not (whether by themselves or encouraging or allowing another) undertake any further development on the Land as defined by section 55 of the Town and Country Planning Act without the grant of planning permission or the written consent of the Claimant's solicitor. The Defendants are forbidden from stationing any more caravans/mobile homes on the Land, erecting any structure/building, importing or depositing

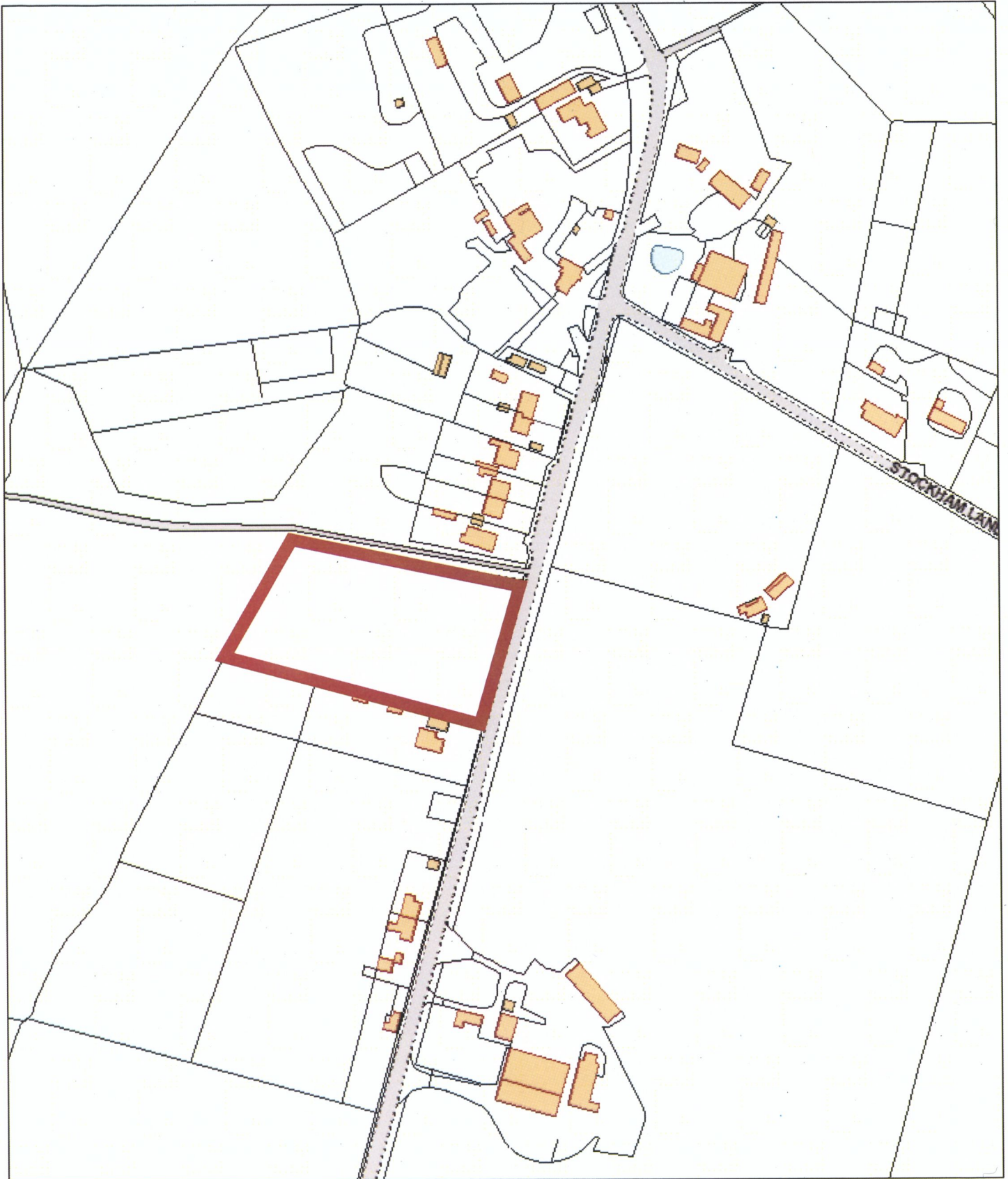
The court office at the County Court at Canterbury, The Law Courts, Chaucer Road, Canterbury, Kent, CT1 1ZA. When corresponding with the court, please address forms or letters to the Court Manager and quote the claim number. Tel: 01227 819200. **Check if you can issue your claim online. It will save you time and money. Go to www.moneyclaim.gov.uk to find out more.**

any material (including hardcore) or excavating/digging up the Land or undertaking any engineering works. For the avoidance of doubt, if a caravan is removed from the Land it cannot be replaced with a different one.

2. For the avoidance of doubt, if a person claims that they were unaware of the terms of this order when they breached it, they must remove the caravans/mobile homes and vacate the Land within 4 hours of being informed of the terms of the order. Otherwise, they shall be in contempt of Court.
3. The Land referred to in this order is the Land adjoining the Cottage, Canterbury Road, Selsted, Dover, Kent CT15 7HL as delineated in red on the attached plan.
4. To effect service the Claimant shall:
 - a) Personally serve each of the named Defendants together with Mr Ransley with a copy of this order;
 - b) Attach a copy of the order to each of the caravans presently on the Land;
 - c) Display a copy of the order on its website; and
 - d) Affix a copy of it contained in a transparent waterproof envelope in a prominent position at the entrance to the Land so that it comes to the attention of any visitors.
5. Liberty to apply upon 48 hours written notice.
6. Any person who is presently living on the Land and who wishes to identify him or herself to join as a named Defendant to the proceedings may apply to the Court on 72 hours written notice to the Court and the Claimant.
7. In the event that the Defendants sell or lease the Land, they shall provide a legible copy of this order to the prospective buyer/tenant prior to the exchange of contracts. Further, they shall provide the full name and contact details of any new owner/tenant to the claimant's solicitor within 48 hours of the exchange of contracts.
8. The matter is adjourned generally with liberty to restore. Once the planning merits of the enforcement notice have been determined, the Claimant may return to Court to seek a mandatory order for eviction and reinstatement.
9. This injunction shall be discharged against the First and Second Defendants, with no order as to costs, once they no longer hold the legal title of the Land as recorded by the Land Registry.
10. The Third Defendant shall pay the Claimant's costs of the claim summarily assessed in the sum of £4,834.80 by 13 August 2020.

You may be able to get free legal aid advice. Go online at www.gov.uk/legal-aid for further information

Shepway Web Map



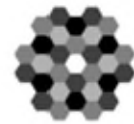
N



Drawn at
1: 2,500 on A4

Contains Ordnance Survey data
© Crown copyright and database right
Folkestone & Hythe District Council 100019677 - 2020

0 12.5 25 50 75 100 125
Meters



Official copy of register of title

Title number TT75506

Edition date 02.07.2021

- This official copy shows the entries on the register of title on 08 JUL 2022 at 13:50:21.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Jul 2022.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Nottingham Office.

A: Property Register

This register describes the land and estate comprised in the title.

KENT : FOLKESTONE AND HYTHE

- 1 (21.07.1966) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Plot 1, Brightmark Welding, Canterbury Road, Selsted, Dover.
- 2 (12.01.2018) The land has the benefit of any legal easements granted by the Transfer dated 27 October 2017 referred to in the Charges Register but is subject to any rights that are reserved by the said deed and affect the registered land.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (02.07.2021) PROPRIETOR: RICHARD WOOD of Kingsthorpe Farm, Magpie Hall Road, Stubbs Cross, Ashford, Kent TN26 1HG.
- 2 (02.07.2021) The value stated as at 2 July 2021 was £35,000.

C: Charges Register

This register contains any charges and other matters that affect the land.

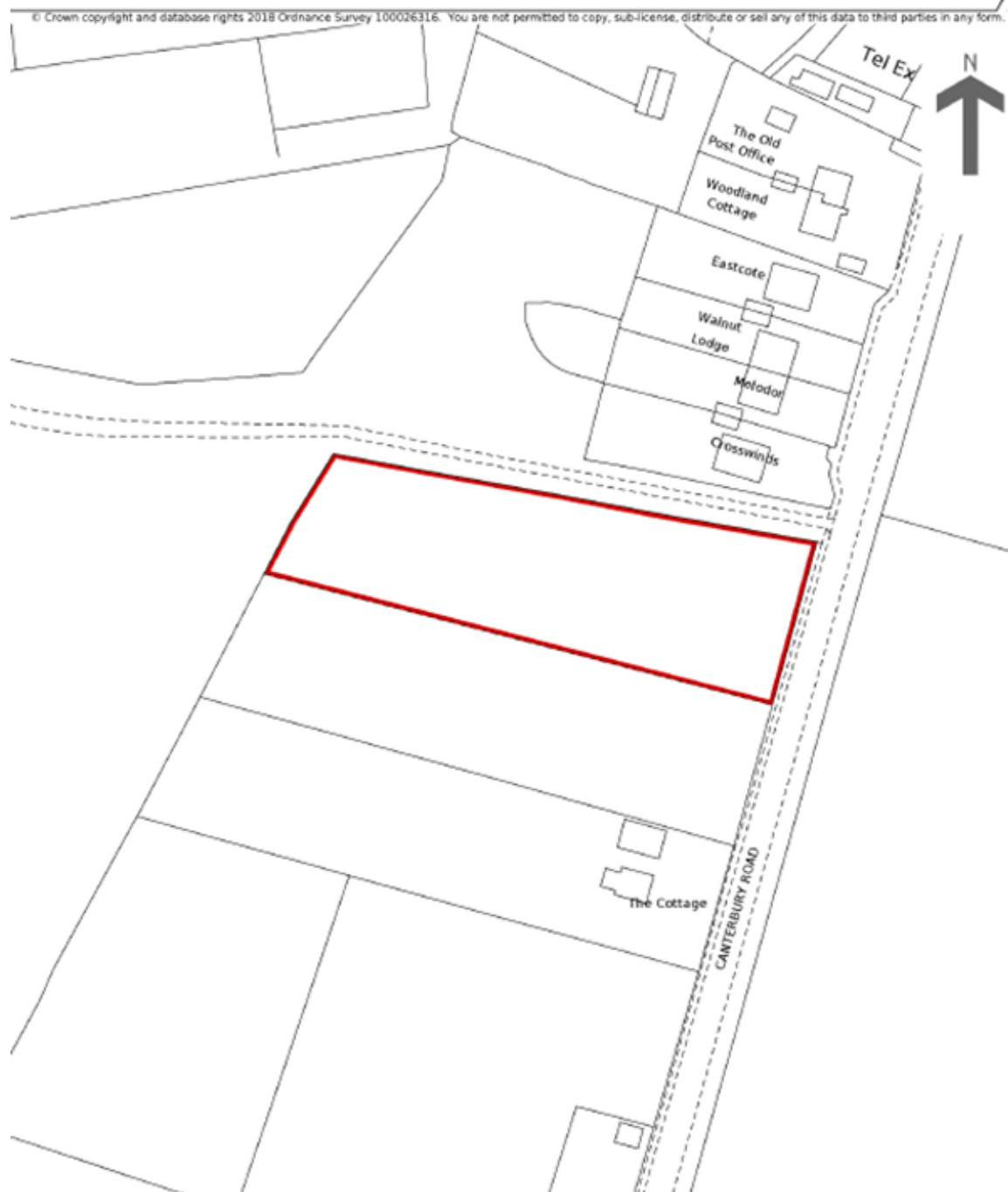
- 1 (12.01.2018) A Transfer of the land in this title dated 27 October 2017 made between (1) Irene Alethea Roe and (2) Evelyn Alethea Andrews contains restrictive covenants.

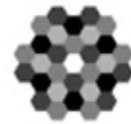
NOTE:-Copy filed.

End of register

HM Land Registry
Official copy of
title plan

Title number **TT75506**
Ordnance Survey map reference **TR2144NE**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Kent : Folkestone and Hythe**





Official copy of register of title

Title number TT80328

Edition date 24.08.2020

- This official copy shows the entries on the register of title on 08 JUL 2022 at 13:48:55.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Jul 2022.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Nottingham Office.

A: Property Register

This register describes the land and estate comprised in the title.

KENT : FOLKESTONE AND HYTHE

- 1 (21.07.1966) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Plot 2, Brightmark Welding, Canterbury Road, Selsted, Dover (CT15 7HL).
- 2 (27.04.2018) The land has the benefit of any legal easements granted by the Transfer dated 27 October 2017 referred to in the Charges Register but is subject to any rights that are reserved by the said deed and affect the registered land.
- 3 (12.01.2018) The land has the benefit of any legal easements reserved by the Transfer dated 27 October 2017 referred to in the Charges Register but is subject to any rights that are granted by the said deed and affect the registered land.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (24.08.2020) PROPRIETOR: ALBERT AMOS MOBEY and AMOS BILL MOBEY of Woodlands, Coombe Walk, Yorkletts, Whitstable CT5 3AL.
- 2 (24.08.2020) The price stated to have been paid on 13 July 2020 was £4,000.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (27.04.2018) A Transfer dated 27 October 2017 made between (1) Irene Alethea Roe and (2) Stephen Frederick Cork contains restrictive covenants.

Title number TT80328

C: Charges Register continued

NOTE: Copy filed.

- 2 (12.01.2018) A Transfer of Plot One, Brightmark Welding dated 27 October 2017 made between (1) Irene Alethea Roe and (2) Evelyn Alethea Andrews contains restrictive covenants by the Transferor.

NOTE: Copy filed under TT75506.

End of register

HM Land Registry
Official copy of
title plan

Title number **TT80328**
Ordnance Survey map reference **TR2144NE**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Kent : Folkestone and Hythe**



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Kent Downs Area Of Outstanding Natural Beauty



N



Drawn at
1: 160,000 on A4

Contains Ordnance Survey data
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Folkestone & Hythe District Council 100019677 - 2020

0 8751,750 3,500 5,250 7,000 8,750
Meters

**Folkestone
& Hythe**



District Council

**NOTIFICATION OF DECISION OF
THE LOCAL PLANNING AUTHORITY**

Date of Decision: 1 April 2021



Email: planning@folkestone-hythe.gov.uk

Philip Brown
74 Park Road
Rugby
CV21 2QX

TOWN AND COUNTRY PLANNING ACT 1990

Application Number: 21/0290/FH

Proposal: Change of use of land as a residential caravan site for 4 gypsy families, each with two caravans, including no more than one static caravan/mobile home, together with laying of hardstanding, erection of 4 no amenity buildings, improvement of access and erection of fencing re-submission of 20/1105/FH.

Site Location: Land Adjoining The Cottage, Canterbury Road, Selsted

DECISION: REFUSED in accordance with the planning application and plans.

REFUSAL REASONS

1

The site is located outside of the defined settlement boundary and the use constitutes unacceptable and unsustainable residential development in the countryside which has resulted in the erosion of the established rural character of the area. No special justification has been given as to why a rural location is essential and as such the development is contrary to policy HB14 of the Places and Policies Local Plan, paragraph 79 of the National Planning Policy Framework and paragraph 25 of the Planning Policy for Traveller Sites which requires local planning authorities to strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan.

2

The site is located in the countryside, within the nationally designated Kent Downs Area of Outstanding Natural Beauty and locally designated Special Landscape Area. The residential use of the land, the laying of the hardcore, the erection of the fencing and the alterations to the access have formalised the appearance of this previously undeveloped site and changed its character resulting in a detrimental impact on the character and setting of the rural area. As such the development is contrary to policies SS3 of the Core

Strategy and Core Strategy Review and NE3 of the Places and Policies Local Plan which seek to conserve and enhance the natural beauty and locally distinctive features of the AONB and its setting, in addition to policy HB14 of the Places and Policies Local Plan which seeks for new gypsy and traveller sites to not result in an adverse effect on the landscape, environmental or other essential qualities of countryside, including the Kent Downs Area of Outstanding Natural Beauty; and paragraph 172 of the National Planning Policy Framework that requires that great weight be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which are given the highest status of protection in relation to these issues.

3

The alterations to the access to provide the required sight lines have resulted in the loss of a section of established hedgerow and a much wider access opening creating a urbanised appearance to the site to the detriment of the rural character of the area and the Area of Outstanding Natural Beauty and Special Landscape Area and resulting in a loss of biodiversity habitat. In order to achieve a maintain the required visibility splays for the access it is also likely that a reduction in height of further sections of hedge would be required, further exacerbating this impact and opening up the site to view from the road and footpath, further exacerbating its negative impact on the character and appearance of the rural area and AONB. Without the removal of the hedgerow the use of the access in connection with the proposed development would be detrimental to highway safety. As such, the development is contrary to policy HB14 of the Places and Policies Local Plan which seeks to ensures that adequate vehicular access and sight lines are provided and that the access is not detrimental to the safety of vehicles, cyclists or pedestrians , policies SS3 of the Core Strategy and Core Strategy Review and NE3 of the Places and Policies Local Plan which seek to conserve and enhance the natural beauty and locally distinctive features of the AONB and its setting and paragraph 172 of the National Planning Policy Framework that requires that great weight be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which are given the highest status of protection in relation to these issues..

4

The development results in an overall net loss of biodiversity habitat due to the loss of ruderal vegetation/grassland to hardsurfacing without sufficient compensatory replacement habitat and with no opportunity for biodiversity net gain within the red line application site boundary. Due to insufficient information it has also not been possible to demonstrate by means of an appropriate assessment, as required under Conservation of Habitats and Species Regulations (2017 as amended), that the residential use would not adversely affect the Stodmarsh Special Protection Area. As such the development is contrary to policy NE3 of the Places and Policies Local Plan.

Informatives and notes

- 1 This refusal of planning permission is in respect of the following submitted plans:

Site location plan date stamped 09.02.21
Site layout plan date stamped 09.02.21
Rear elevation date stamped 09.02.21
Front elevation date stamped 09.02.21
Side elevations dated stamped 09.02.21
Proposed day room date stamped 09.02.21
Drawing No. PBA 3 - post and rail fence
Drawing No. PBA 4 - fencing

In determining this planning application, the Council has had due regard for all relevant matters and particularly the National Planning Policy Framework. This includes the duty to work positively with the applicant to resolve potential issues and seek acceptable solutions.

This decision relates ONLY to the requirements of Town and Country Planning Act 1990. Separate determinations are required for other aspects of the planning regime, building regulations and environmental legislation. Any other permissions must be obtained separately from the relevant body.

Approved Documents



Issued by the Chief Planning Officer

This decision notice consists of 4 pages

NOTIFICATION TO APPLICANT

APPEALS TO THE SECRETARY OF STATE

If you are aggrieved by the decision of your local planning authority then you may be able appeal to the Secretary of State under Section 78 of the Town and Country Planning Act 1990. If you want to appeal, then you must do so promptly.

Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN or online at www.gov.uk/government/organisations/planning-inspectorate.

The Inspectorate's website also gives details of timescales and the processes which would apply to this type of application.

IMPORTANT - THIS COMMUNICATION AFFECTS YOUR PROPERTY

**TOWN AND COUNTRY PLANNING ACT 1990
(as amended by the Planning and Compensation Act 1991)**

ENFORCEMENT NOTICE

ISSUED BY THE DISTRICT COUNCIL OF FOLKESTONE & HYTHE

- 1. THIS IS A FORMAL NOTICE** issued by the District Council of Folkestone & Hythe ("the Council") because it appears to the Council, being the local planning authority for the purposes of section 172 of the Town and Country Planning Act 1990 ("the Act"), that there has been a breach of planning control, within paragraph (a) of section 171A(1) of the Act, in respect of the land described below.

The Council considers that it is expedient to issue this Notice, having regard to the provisions of the development plan and to other material planning considerations.

The Annex at the end of the Notice and the enclosures to which it refers contain important additional information.

- 2. LAND TO WHICH THIS NOTICE RELATES**

Land ("the Land") adjoining The Cottage, Canterbury Road, Selsted, Kent, edged in thick red on the attached plan.

- 3. THE MATTER(S) WHICH APPEAR TO CONSTITUTE THE BREACH OF PLANNING CONTROL**

Without planning permission, the change of use of the Land from agriculture to a mixed use for agriculture and as a residential caravan site] and the carrying out of incidental works to facilitate the change of use comprising the laying of hardstanding, alterations to the access and the erection of fencing

4. REASONS FOR ISSUING THIS NOTICE

The reasons the Council considers it expedient to issue this Notice are:-

- i. The Land is located outside of the defined settlement boundary and the caravan site use constitutes unacceptable and unsustainable residential development in the countryside that has resulted in the erosion of the established rural character of the area. No special justification has been given as to why a rural location is essential and as such the development is contrary to policy HB14 of the Places and Policies Local Plan, paragraph 79 of the National Planning Policy Framework and paragraph 25 of the Planning Policy for Traveller Sites which requires local planning authorities to strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan.
- ii. The Land is located in the countryside, within the nationally designated Kent Downs Area of Outstanding Natural Beauty and locally designated Special Landscape Area. The residential caravan use of the Land, the laying of the hardcore, the erection of the fencing and the alterations to the access have formalised the appearance of this previously undeveloped site and changed its character resulting in a detrimental impact on the character and setting of the rural area. As such the development is contrary to policies SS3 of the Core Strategy and Core Strategy Review and NE3 of the Places and Policies Local Plan which seek to conserve and enhance the natural beauty and locally distinctive features of the AONB and its setting, in addition to policy HB14 of the Places and Policies Local Plan which seeks for new gypsy and traveller sites to not result in an adverse effect on the landscape, environmental or other essential qualities of countryside, including the Kent Downs Area of Outstanding Natural Beauty; and paragraph 172 of the National Planning Policy Framework that requires that great weight be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which are given the highest status of protection in relation to these issues.
- iii. Achieving adequate sight lines required for the change of use of the Land has required the loss of part of an established hedgerow along the Land frontage and may necessitate a reduction in the height of parts of the remaining hedgerow in order to achieve and maintain the required visibility splays. This loss of hedgerow has opened up the Land to views from the road and footpath and, together with the erection of close boarded fencing adjacent to the access, has exacerbated the negative impact of the development and the Land on the character and appearance of the rural area and AONB. Without the removal of the hedgerow the use of the access in connection with the proposed development would be detrimental to highway safety and suitable replacement planting cannot be achieved without interrupting the sight lines, creating a hazard to highway safety. As such, the development is contrary to policy HB14 of the Places and Policies Local Plan which seeks to ensure that adequate vehicular access and sight lines are provided and that the access is not detrimental to the safety of vehicles, cyclists or pedestrians, policies SS3

of the Core Strategy and Core Strategy Review and NE3 of the Places and Policies Local Plan which seek to conserve and enhance the natural beauty and locally distinctive features of the AONB and its setting and paragraph 172 of the National Planning Policy Framework that requires that great weight be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which are given the highest status of protection in relation to these issues.

- iv. The development has resulted in an overall net loss of biodiversity habitat due to the removal of sections of hedgerow for the alterations to the access and the loss of ruderal vegetation/grassland to hardsurfacing, without sufficient compensatory replacement habitat. It has also not been possible to demonstrate by means of an appropriate assessment, as required under Conservation of Habitats and Species Regulations (2017 as amended), that the waste water likely to be generated by the residential use would not adversely affect the Stodmarsh Special Protection Area. As such the development is contrary to policy NE2 of the Places and Policies Local Plan which requires development to safeguard and protect sites of European importance and seeks to ensure that the intrinsic value of sites for biodiversity is enhanced, or at least maintained.
- v. No personal or other circumstances have been advanced that would justify the grant of planning permission for the development enforced against.
- vi. The change of use has taken place within the previous 10 years and the operational development carried out within the previous 4 years and, as such it has not become immune from enforcement action. It is considered in the public interest, expedient and proportionate to issue a Planning Enforcement Notice.

5. WHAT YOU ARE REQUIRED TO DO

In order to comply with this Notice you are required to:

- I. Cease the use of the Land for the stationing of caravans for residential purposes.
- II. Remove all caravans and associated vehicles from the Land.
- III. Remove all equipment and paraphernalia associated with the residential use from the Land.
- IV. Take up the hardstanding and remove the resulting materials from the Land.
- V. Remove the fencing, gates, posts and gravel boards and any associated concrete, post holders, rubble and debris from the Land.
- VI. Upon completion of steps IV and V, restore the Land to the condition it was in before the breach of planning control took place.

6. TIME FOR COMPLIANCE

The period for compliance with the steps set out in paragraph 5 is:

Steps I to V - 9 (nine) months from the date of this notice.

Step VI – 15 (fifteen) months from the date of this notice.

7. WHEN THIS NOTICE TAKES EFFECTIVE

This Notice takes effect on **12th July 2021** unless an appeal is made against it beforehand.

Dated: **8th June 2021**

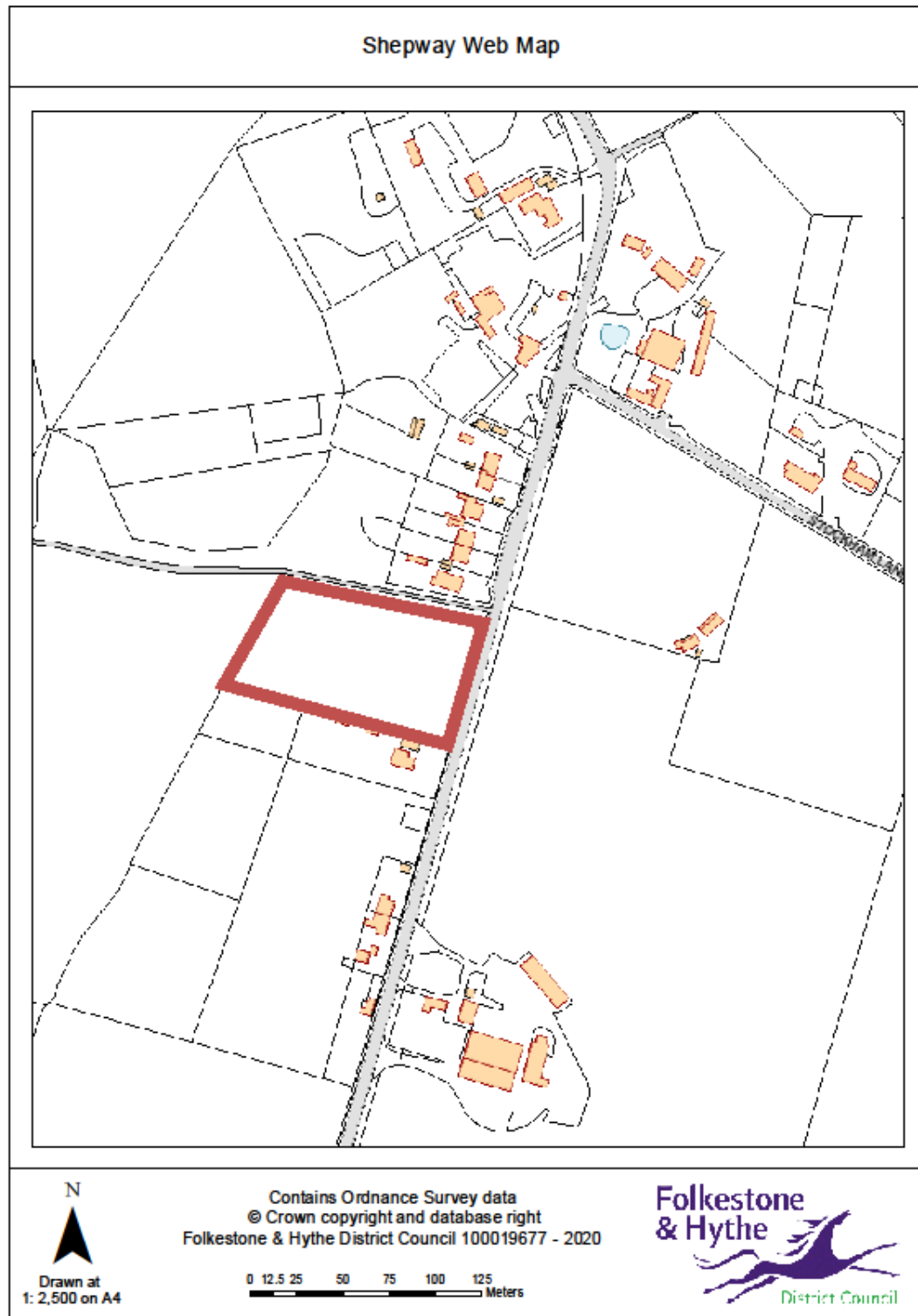


Signed:

Llywelyn Lloyd
Chief Planning Officer

on behalf of
The District Council of Folkestone & Hythe
Civic Centre
Castle Hill Avenue
Folkestone
Kent CT20 2QY

Plan of site



ANNEX

YOUR RIGHT OF APPEAL

You can appeal against this Notice, but any appeal must be received, or posted in time to be received by the Secretary of State (at the Planning Inspectorate) before **12th July 2021**.

Appeal forms can be obtained from the Planning Inspectorate Customer Service Team on 0117 372 6372, E-Mail enquiries@pins.gsi.gov.uk

Information and guidance regarding how to submit an appeal is also available on The Planning Inspectorate website, which can be accessed by using the link :- www.planning-inspectorate.gov.uk

You can submit your appeal online using the Planning Portal website at www.planningportal.gov.uk/pcs.

Please note that a separate appeal form must be completed for each individual person or organisation on whom this Notice is served.

WHAT HAPPENS IF YOU DO NOT APPEAL

If you do not appeal against this enforcement Notice, it will take effect on **12th July 2021** and you must then ensure that the required steps for complying with it, for which you may be held responsible, are taken within the period(s) specified in the Notice.

Failure to comply with an enforcement Notice which has taken effect can result in prosecution and/or remedial action by the Council.

FURTHER EXPLANTORY NOTE

You should read these notes carefully before submitting an appeal.

Town and Country Planning Act, 1990 – Enforcement Notices

- (1) The following provisions of the Town and Country Planning Act, 1990 relate to the Enforcement Notice accompanying this note.

Section 171A – Defines what constitutes a breach of planning control and what action can be taken to deal with a breach of planning control.

Section 171B – Defines the time limits relating to a breach of planning control, i.e. 4 years for a breach consisting of the carrying out of building or engineering operations on land and for use of any building as a single dwellinghouse and 10 years for any other breach including an unauthorised use of land and breach of a condition attached to a planning consent.

Section 172 – Provides the powers to a local planning authority to issue an Enforcement Notice.

Section 173 – Sets out what information an Enforcement Notice must contain including the steps which the authority requires to be taken or the activities which the authority requires to cease, in order to deal with the breach. Also, the Notice should include the date on which the Notice takes effect and the period in which the breach must be dealt with.

Section 174 – Sets out the rights of appeal and the grounds on which an appeal can be submitted.

The grounds of appeal are:-

- (a) that planning permission should be granted for the breach of planning control set out in the Notice;
- (b) that the breach has not occurred;
- (c) that the matters set out in the Notice do not constitute a breach;
- (d) that the breach is immune from enforcement action as it has occurred outside the time limits in Section 171B (above) and is therefore 'lawful';
- (e) that service of the Notices did not comply with the rules laid down i.e. it was not served on all owners and occupiers of the land and all persons having an interest in the land
- (f) that the steps required by the Notice are excessive

(g) that the period for compliance is unreasonably short

NB: Not all of these grounds may be relevant to you.

Section 175 – Gives the Secretary of State power to make regulations on the procedure for the submission of appeals. Also provides that if an appeal is submitted the Notice will have no effect until the appeal is determined or withdrawn.

Section 176 – Sets out the powers of the Secretary of State to determine appeals including the power to vary Notices and to overlook procedural defects in the service of the Notice in cases where no one has been prejudiced.

Section 177 – Sets out the powers of the Secretary of State to grant planning permission on enforcement appeals for the matters on which the Notice is based or to discharge the condition(s) which are the subject of the appeal.

- (2) Any appeal submitted must be made in writing and must specify the grounds on which it is brought (as set out in Section 174). Any appeal must be made before the date in the Notice on which it comes into effect. If it is made by post it must be in a properly addressed in a pre-paid letter posted in time for it to be delivered before the date on which the Notice comes into effect. Appeals can also be made on-line through the Planning Portal using the Planning Casework Service at www.planningportal.gov.uk/pcs.
- (3) Appeal forms can be obtained from the Planning Inspectorate through the Customer Service Team on 0117 372 6372, e-mail enquiries@pins.gsi.gov.uk.
- (4) The fee for submitting an appeal against the Notice can be confirmed by the Planning Inspectorate.
- (5) When submitting the appeal you should specify the grounds and state briefly the facts on which you are relying on to support each of the grounds stated. If you do not supply sufficient information you will be notified by the Secretary of State and given 14 days to supply further information.

(6) The Notice has been served on the following persons:-

Mr JAMES ROBSON RANSLEY of Brandywine, Chislet, Canterbury, Kent, CT3 4DN.

Mr ALBERT AMOS MOBEY of Woodlands, Coombe Walk, Yorkletts, Whitstable CT5 3AL.

Mr AMOS BILL MOBEY of Woodlands, Coombe Walk, Yorkletts, Whitstable CT5 3AL

Any occupiers of Land adjoining The Cottage, Canterbury Road, Selsted, Kent, highlighted in thick red on the attached plan



Fig 1 – vehicles and touring caravan which was brought onto the land in July 2020.



Fig 2. Vehicle and static caravan



Fig 3. Vehicles parked on the land.



Fig 4. Vehicle and another touring caravan which we believe has been on the land since before the present owners took over the land.