

## **DETAILS OF CLAIM**

1. The Claimant seeks an injunction pursuant to Section 187B of the Town and Country Planning Act 1990 (as amended) to prevent continuing breaches of planning control.
2. The Claimant is the Local Planning Authority for the area including the Land known as “Land south of Reading Road” registered with HM Land Registry under various title numbers as set out in the table below (“the Land”).
3. Section 187B of the Town and Country Planning Act 1990 provides that:
  - (1) Where a local planning authority consider it necessary or expedient for any actual or apprehended breach of planning control to be restrained by injunction, they may apply to the court for an injunction, whether or not they have exercised or are proposing to exercise any of their other powers under this Part.
  - (2) On an application under subsection (1) the court may grant such an injunction as the court thinks appropriate for the purpose of restraining the breach.
  - (3) Rules of court may provide for such an injunction to be issued against a person whose identity is unknown.
  - (4) In this section “the court” means the High Court or the county court.
4. As set out in the witness statement of Fenella Woods, Senior Planning Enforcement Officer employed by the Claimant, development has taken place in breach of planning control and in breach of a Temporary Stop Notice issued on 4<sup>th</sup> November 2025. It is the Council’s position that works have been undertaken to prepare the Land for residential occupation and that works are continuing in order to facilitate further residential occupation.
5. The interests of the Defendants are set out in the table below. The 1<sup>st</sup> -21<sup>st</sup> Defendants are either owners of the Land registered at HM Land Registry or pending registration or have an interest in the Land by virtue of being named on planning application reference 25/02518/FULMAJ.
6. The 22<sup>nd</sup> Defendant is identified only as “Persons Unknown” and refers to those persons who are not named Defendants to this Claim who may have an interest in the Land and/or intend to carry out further works to the Land and/or intend to occupy the Land for residential purposes. The Claimant relies upon Paragraph 21.2 of the Practice Direction Part 49E of the CPR. The Claimant is unable to describe the 22<sup>nd</sup> Defendant with any greater particularity than the description herein.

7. The change of use of the Land is development for the purposes of Section 55 of the Town and Country Planning Act 1990 and requires planning permission. Works have already been undertaken to the Land which constitute a breach of planning control and for which planning permission was required and one caravan on the Land is already occupied in breach of planning control.
8. Operational development is development for the purposes of Section 55 of the Town and Country Planning Act 1990 and requires planning permission. Operational development has taken place including the following:
  - the formation/widening of new accesses onto Reading Road;
  - laying of hardstanding;
  - ground levelling;
  - erection of fencing and enclosures;
  - installation of service infrastructure (including unauthorised electricity and water connection).
9. The Land is located within the open countryside, outside of settlement boundaries and is situated within a designated Local Wildlife Site. There is a public right of way (PROW), Footpath ALDE/8/4 located on the Land. To the east of the Land lies Ancient Woodland and a designated Site of Special Scientific Interest. The Land is opposite Atomic Weapons Establishment (AWE) Aldermaston and lies within an area known as the AWE Aldermaston Detailed Emergency Planning Zone. Any change of use requires full consideration by the local planning authority.
10. The Claimant considers that it is likely that the Defendants are intending to undertake further works to facilitate further residential use of the Land.
11. In the circumstances set out in the witness statement of Fenella Woods and having regard to the provisions of section 187B of the Town and Country Planning Act 1990 and having regard to Human Rights issues and the Equality Act 2010 and all the circumstances of this matter, it is considered necessary and expedient in the public interest to seek an injunction to prevent further breaches of planning control on the Land.
12. CPR Part 8 applies to this Claim.

13. The Claimant seeks its costs for and incidental to the claim and any other relief the court considers appropriate.

Table showing interests of the Defendants (Addresses taken from the Planning Application and Transfer documents)

<b>Defendant Number</b>	<b>Name</b>	<b>Address</b>	<b>Ownership Title or Interest</b>
1	UK LAND HOLDINGS 1 LIMITED	St Mary's, The Parade, Castletown, Isle Of Man, IM9 1LG	Owner - BK516658
2	Caroline Berry	26 Compton Way, Middleton, Manchester, M24 2BG	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
3	Nora Connors	7 Greenacres, Market Harbour, LE16 7QT	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
4	Patrick Fagan Connors	2 Ashlea Green, Clowne, Chesterfield, Derbyshire, S43 4NS	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
5	Jimmy O'Connors	7 Greenacres, Market Harbour, LE16 7QT	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ

6	Johnny Wall	6 Silverwood Close, Roydon, Waltham Abbey, WA14 2PX	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
7	Patrick James Connors	6 Silverwood Close, Roydon, Waltham Abbey, WA14 2PX	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
8	John Jude O'Brien	30 The Downs, Altrincham, Cheshire, WA14 2PX	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
9	Michael Wall	Peel House, 30 The Downs, Altrincham, Cheshire, WA14 2PX	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
10	Jerry Grogan	26 Compton Way, Middleton, Manchester, M24 2BG	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
11	Richard O'Brien	26 Hazel Road, New Ollerton, Newark, NG22 9TF	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ

12	Joseph Doyle	16 City Business Centre, Hyde Street, Winchester, SO23 7TA	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
13	Noreen Flynn	16 City Business Centre, Hyde Street, Winchester, SO23 7TA	Unknown ownership but listed on the Planning Application 25/02518/FULMAJ
16	Patrick Stokes – Plot 17	C/O Brogan Property Lawyers, 64 High Street, Frimley, Surrey, GU16 7JE	New Title: BK542553
17	Bernard Stokes – Plot 18	C/O Brogan Property Lawyers, 64 High Street, Frimley, Surrey, GU16 7JE	New Title: BK542462
18	Tommy Stokes – Plot 14	C/O Brogan Property Lawyers, 64 High Street, Frimley, Surrey, GU16 7JE	New Title: BK542459
19	Vincent Crumlish	C/O Brogan Property Lawyers, 64 High Street, Frimley, Surrey, GU16 7JE	New Title: BK542457
20	Hughie Stokes – Plot 16	C/O Brogan Property Lawyers, 64 High Street, Frimley, Surrey, GU16 7JE	New Title: BK538104
21	Benjit Singh Dhesi	C/O Brogan Property Lawyers, 64 High Street, Frimley, Surrey, GU16 7JE	New Title: BK535284

22	Thomas Flynn – Plot 10	C/O Brogan Property Lawyers, 64 High Street, Frimley, Surrey, GU16 7JE	New Title: BK533789
23	Martin Stokes – Plot 6	C/O Brogan Property Lawyers, 64 High Street, Frimley, Surrey, GU16 7JE	New Title: BK533786