

Statement filed on behalf
of the Claimant
Name of Witness: **Phil RANDS**
No of Statement: **1**
Dated: 26th May 2026

**IN THE HIGH COURT of JUSTICE
KINGS BENCH DIVISION**

Claim No;

**IN THE MATTER OF SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990
BEFORE THE HONOURABLE MR JUSTICE MANSFIELD**

DATED 24 MAY 2026

BETWEEN:

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Claimant

And

PERSONS UNKNOWN

(being persons who are entering, occupying, residing on, bringing caravans, mobile homes or other structures onto, or carrying out or intending to carry out works or development on, land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire, as shown edged red on the plan attached to this Order)

Defendants

WITNESS STATEMENT

I, Phil RANDS of P&D Investigations Limited of 5 Westcott Welwyn Garden City Herts AL7 2PP, a Process Server and as instructed by Ivy Legal Limited, Office 2.05 Clockwise Old Town Hall 30 Tweedy Road Bromley BR1 3FE, Solicitors acting for the above named Claimant, will state follows:-

1. That I am a Process Server and Investigator. I am over the age of sixteen.
2. That I did at 1142 hours on Monday the 25th day of May 2026 (a Bank Holiday), attend the supplied location of West of Moor Drove", Histon / Cottenham Cambridgeshire CB24 9ES. I could see circa 5 white caravans, along with around 20 or 30 males 'working' on the Land / Site with Diggers / Rollers etc and other vans / vehicles were present. I met with a white male aged circa 50-55, with white hair and of stocky build, who approached me. I explained the reason for my visit but the male refused to give his name or that of the Planning Agent for the Site. I offered the male a copy of the Order etc but he refused and stated that if I tried to put up Copies of the Order etc, that they would "block me / my vehicle in, for 6 hours!". The male was aggressive and I duly left the site / contacted the police.

3. That I did at 1240 hours on Monday the 25th day of May 2026, re-attend the supplied location of West of Moor Drove", Histon / Cottenham Cambridgeshire CB24 9ES and on this occasion I was accompanied by PC 229 GREENING of Cambridgeshire Police.

There were less males now present but I could not give a number, however Diggers / Rollers / vans / vehicles were still present along with an Excavator and a dumper truck. The latter was full and leaving the Site, as we walked up the dirt track.

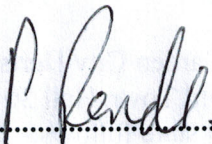
I met with a different white male aged circa 50 and with brown hair, who approached me. I explained the reason for my visit but the male refused to give his name. I offered the male a copy of the Order etc but he refused and said "hang it on the fence"

I did duly Serve PERSONS UNKNOWN, with a Court Order (including Penal Notice) dated 24th May 2026, along with a Solicitors Letter. by attaching the aforementioned documents in plastic sleeves where they could clearly be seen, securely on the fences of the Land and one where the fencing started. Copies of the documents so Served, are shown as my Exhibit 'PR1'.

As we were walking on the dirt Track so as to leave, TWO Large Caravans being towed by 4x4 / American Truck type vehicles, were driving in and ONTO the Site.

4. The Order so served as aforesaid had a Penal Notice, which read as follows; **IF YOU, THE WITHIN NAMED DEFENDANTS, PERSONS UNKNOWN, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND LIABLE TO IMPRISONMENT OR FINED OR YOUR ASSETS SEIZED. ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.**

5. Statement of Truth: I believe 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.

SIGNED 

DATED 26th May 2026

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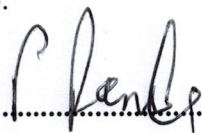
PERSONS UNKNOWN

(being persons who are entering, occupying, residing on, bringing caravans, mobile homes or other structures onto, or carrying out or intending to carry out works or development on, land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire, as shown edged red on the plan attached to this Order)

Defendants

EXHIBIT

This is the Exhibit marked 'PR1' referred to in the signed Statement of Phil RANDS, Process Server, dated the 26th May 2026.

SIGNED 

DATED 26th May 2026

Ivy Legal
Office 2.05, Clockwise, Old Town Hall
30 Tweedy Road, Bromley BR1 3FE
enforcement@ivylegal.co.uk
www.ivylegal.co.uk
0203 7455 896



Persons Unknown

24 May 2026

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL V PERSONS UNKNOWN

We act on behalf of South Cambridgeshire District Council ("the Council").

On 24 May 2026 the Council secured an **interim injunction against PERSONS UNKNOWN** from the High Court under s187B of the Town and Country Planning Act 1990. The terms of the order are encapsulated in the enclosed and a sealed copy will be served on the site as soon as possible.

Please take note of the penal notice on the interim order which makes clear that failure to comply with the order may render any person breaching this order liable to imprisonment or a fine.

We attach, by way of service, a hard copy of the Injunction Order of 24 May 2026.

The witness statement and exhibits can be downloaded here:

Stephen Kelly:



Cllr Cahn:



A note of the injunction hearing can be downloaded here:



Your attention is drawn to the penal notice on that order which makes clear that, if the order is granted, failure to comply may render you liable for imprisonment or a fine.

Please note the return date of **3 June 2026 at 10:30am at The Royal Courts of Justice, Strand, London WC2A 2LL** at which time the Court will consider whether the Injunction Order should be continued, varied or discharged. You must attend this hearing.

You are advised to seek legal advice in relation to this application as soon as possible. If you fail to turn up at the 3 June 2026 hearing for the matter on the date and time of the listing, the court will be asked to proceed in your absence.

Yours faithfully,

Izindi Visagie

Partner at Ivy Legal

IN THE HIGH COURT OF JUSTICE

Claim No. []

KING'S BENCH DIVISION

IN THE MATTER OF SECTION 187B OF THE TOWN AND COUNTRY PLANNING ACT 1990

BEFORE THE HONOURABLE MR JUSTICE MANSFIELD

DATED 24 MAY 2026

B E T W E E N : -

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Claimant

and

PERSONS UNKNOWN

(being persons who are entering, occupying, residing on, bringing caravans, mobile homes or other structures onto, or carrying out or intending to carry out works or development on, land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire, as shown edged red on the plan attached to this Order)

Defendants

INJUNCTION ORDER

PENAL NOTICE

IF YOU, THE WITHIN NAMED DEFENDANTS, PERSONS UNKNOWN, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND LIABLE TO IMPRISONMENT OR FINED OR YOUR ASSETS SEIZED. ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT

1. This Order prohibits you from doing the acts set out in this Order. You should read the terms of the Order and these guidance notes very carefully. You are advised to consult a solicitor as soon as possible. You have a right to ask the Court to vary or discharge the Order.
2. If you disobey this Order you may be found guilty of contempt of court and may be sent to prison or fined, or your assets may be seized.

On 24 May 2026, The Honourable Mr. Justice Mansfield considered the application brought by South Cambridgeshire District Council ("the Claimant") for an injunction under section 187B of the Town and Country Planning Act 1990, supported by the witness statement listed in Schedule A and accepted the undertakings listed in Schedule B at the end of this Order.

UPON hearing Counsel for the Claimant, upon reading the witness statements listed in Schedule A and upon accepting the undertakings listed in Schedule B

AND UPON the Court being satisfied that the application has properly been made without notice to the Defendants having regard to the urgency of the matter, the risk of further development and occupation occurring before any noticed hearing, and the present inability to identify the persons with an interest in, or carrying out or intending to carry out works on, the Land

AND UPON the Court noting that the Claimant has been unable to obtain HM Land Registry title information for the Land before issue because the HM Land Registry online service was unavailable on the day of issue, as explained in the witness statement of Stephen Kelly

IT IS ORDERED THAT FROM ALTERNATIVE SERVICE BEING EFFECTED UNTIL 3 JUNE 2026 (THE RETURN DATE) OR FURTHER ORDER:

THE INJUNCTION

1. In relation to the land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire ("the Land"), as shown edged red on the attached plan, the Defendants, whether by themselves or by instructing, encouraging, permitting or assisting any other person, must not use the Land or carry out works to the Land in breach of planning control and, in particular, must not:
 - i. use the Land, or any part of it, for human habitation or residential occupation, including as a residential caravan site, or for any other purpose in breach of planning control;
 - ii. bring onto, station, site or place on the Land any touring caravan, static caravan, mobile home, park home, cabin, chalet or other structure for the purpose of human habitation or residential occupation or for any other purpose in breach of planning control;
 - iii. bring onto, erect, construct or install any buildings, day rooms, amenity buildings, utility buildings, portable toilets, containers, sheds, outbuildings, walls, gates, fences or other structures on the Land in association with human habitation, residential occupation, the stationing of caravans or mobile homes, or any other purpose in breach of planning control;
 - iv. bring onto the Land any portable structures, domestic equipment, domestic paraphernalia, storage items or other items associated with human habitation, residential occupation, or the creation of a residential caravan site in breach of planning control;

- v. bring onto, deposit, spread or store on the Land any further waste materials, hardcore, aggregate, road planings, building materials or like materials for any purpose including the creation, completion, extension or laying of hardstandings, hard surfaces, bases, pitches, tracks, parking areas, accessways, paths or roadways in association with the stationing of caravans or mobile homes, human habitation, residential occupation or any other purpose in breach of planning control;
 - vi. carry out any further engineering operations, excavation, levelling, grading, surfacing, drainage works, formation of accessways, paths, roadways or hardstanding, or any works associated with or in preparation for the use of the Land for the stationing of caravans and/or mobile homes or for human habitation or residential occupation in breach of planning control;
 - vii. install, connect, extend or alter any services or infrastructure on the Land, including foul drainage, septic tanks, cesspits, package treatment plants, soakaways, pipework, water, electricity, gas, heating, lighting, broadband, telecommunications or other utilities, where associated with or in preparation for human habitation, residential occupation, the stationing of caravans or mobile homes or any other purpose in breach of planning control;
 - viii. remove hedgerows, trees or vegetation, alter boundary treatment, or erect or complete any fencing, gates, walls, bunds or means of enclosure associated with the creation of residential pitches, a residential caravan site, the stationing of caravans or mobile homes, or any other purpose in breach of planning control;
 - ix. undertake any further development on the Land as defined by section 55 of the Town and Country Planning Act 1990 without the express grant of planning permission or otherwise in breach of planning control.
2. For the avoidance of doubt, this Order does not prohibit any lawful permitted development rights and/or the lawful agricultural use of the Land or the making of a planning application or other lawful application to the Claimant or to any other competent authority.

IT IS FURTHER ORDERED THAT

ALTERNATIVE SERVICE

3. Pursuant to CPR 6.15 and 6.27, permission for alternative service of this Order and related documentation is granted.
4. Service of this Order on all of the Defendants may be effected by the Claimant:
 - a. posting unsealed copies in transparent waterproof envelopes in prominent positions at or near the entrance to the Land and, where safe and practicable, on fencing, gates or other prominent features on or immediately adjoining the Land;
 - b. posting unsealed copies in transparent waterproof envelopes on any caravans, mobile homes, cabins, structures, vehicles, plant or equipment that may be found on the Land;
5. This shall be deemed to be good and sufficient service of this Order on all of the Defendants and the need for personal service of this Order is dispensed with in relation to all Defendants (for the purposes of CPR Part 81).
6. The Claimant shall also provide a QR code with the Order providing access to the Application Notice, evidence in support of the Application and future documentation.
7. The Claimant shall publish an unsealed copy of this Order on the Claimant's website;
8. Subject to further order, copies of any future documentation may be validly served on the Defendants in the ways specified above.

9. Should the Claimant become aware of the identity of any person currently encompassed within Persons Unknown, it shall apply, as soon as reasonably practicable thereafter, to join that individual to these proceedings.

10. Service in accordance with paragraph 4 above shall be deemed to be good and sufficient service on the Defendants of this Order, the Application Notice, the evidence in support of the application and any future documentation on the date on which the document is first affixed, posted or published by any of the methods set out in paragraph 4.

THE RETURN DATE

11. There shall be a hearing at 10.30am on 3 June 2026 (the Return Date) with a time estimate of 2 hours at the Royal Courts of Justice, Strand, London WC2A 2LL, or by such remote or hybrid means as the Court may direct. On the Return Date, the Defendants and any person affected by this Order may, if so advised, make representations in relation to the continuation, variation or discharge of this Order.

VARIATION OR DISCHARGE OF THIS ORDER

12. The Defendants, and any person notified of this Order or affected by it, may apply to the Court to vary or discharge this Order, or so much of it as affects that person, on 48 hours written notice to the Claimant's legal representatives. The hours between 5pm on any Friday and 9am on any Monday shall not be counted as part of the 48 hours' notice period.

13. Any person who wishes to be heard under paragraphs 5 or 6 should apply to the Court to be added as a named defendant to these proceedings and should provide their name, address and contact details in the application.

COSTS OF THE APPLICATION

14. Costs reserved.

15. Liberty to apply.

GUIDANCE NOTES

Effect of this Order - the Defendants

A Defendant who is ordered not to do something must not do it personally or in any other way. A Defendant must not do it through others acting on their behalf, on their instructions or with their encouragement, permission or assistance.

Effect of this Order - parties other than the Claimant and Defendants

It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

The grant of this Order does not prevent the Defendants or any person affected by it from raising any objection of law, practice, justice or convenience at the Return Date or any other hearing before the Court.

Interpretation of this Order

1. In this Order, "the Land" means the land known as "West of Moor Drove", Histon/Cottenham, Cambridgeshire shown edged red on the attached plan.
2. In this Order, references to "the Defendants" mean the Defendants identified as Persons Unknown and each of them.
3. A requirement to serve on "the Defendants" means service by the alternative service methods authorised by this Order. The Order is effective against any Defendant or person affected by it on whom it is served or who otherwise has knowledge of it.

4. The Defendants identified as Persons Unknown are adult persons who are not named defendants to this application who have an interest in the Land, who are entering or occupying the Land, who have carried out or intend to carry out works or development on the Land, or who intend to station caravans, mobile homes or other structures on the Land for human habitation or residential occupation or any other purpose in breach of planning control.
5. For the purposes of this Order, "development" has the meaning given by section 55 of the Town and Country Planning Act 1990.

Communications with the Court

All communications to the Court about this Order should be sent to the Royal Courts of Justice, Strand, London WC2A 2LL, quoting the claim number above. The offices are open between 10.00am and 4.30pm Monday to Friday except bank holidays.

SCHEDULE A

Evidence

The Judge read the following written evidence before making this Order:

1. First Witness Statement of Stephen Kelly dated 24 May 2026, together with exhibits SK/1 to SK/3.
2. First Witness Statement of Dr Martin Cahn dated 24 May 2026, together with exhibits MC/1 to MC/4.

SCHEDULE B

Undertakings given to the Court by the Claimant

1. As soon as reasonably practicable after the making of this Order, the Claimant will serve this Order, the evidence in support of the application, the skeleton argument for the hearing and a note of the hearing by the alternative methods authorised in this Order.
2. As soon as reasonably practicable after the making of this Order, the Claimant will publish on its website details of the injunction, the Order, the Return Date, a plan identifying the Land and copies of the application documents, subject to any necessary redaction of personal data.
3. The Claimant will place or affix copies of this Order and the related documentation at or near the entrance to the Land and in such other prominent positions on or adjacent to the Land as are safe and practicable.
4. The Claimant will make copies of this Order and the application documents available free of charge to any person affected by this Order who requests them from the Claimant or the Claimant's legal representatives.
5. The Claimant will file and serve evidence of service before the Return Date.
6. When the HM Land Registry online service is available, the Claimant will take reasonable steps to obtain title information for the Land and will consider whether any person thereby identified should be served directly and/or added as a named defendant to these proceedings.
7. As soon as practicable, the Claimant will file a claim form and serve the sealed claim form in this action claiming the appropriate relief.
8. As soon as practicable, the Claimant will serve a sealed copy of this order in accordance with the alternative methods authorised in this Order.

Name and address of Claimant's legal representatives:

Ivy Legal Limited
Office 2.05, Clockwise
Old Town Hall
30 Tweedy Road
Bromley
BR1 3FE
Email: enforcement@ivylegal.co.uk
Tel: 0203 7455 896

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Defendants

INJUNCTION ORDER

Ivy Legal Limited
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PLAN 1

The Land

[INSERT PLAN SHOWING THE LAND KNOWN AS "WEST OF MOOR DROVE" EDGED RED]

Note: the draft Order has been prepared on the basis that HM Land Registry title information was not available at the time of issue. The plan should be checked against the final application bundle before sealing.



























