



Claim Form (CPR Part 8)

In the Guildford County Court

Claim no.

Fee Account no.

Help with Fees -
Ref no. (if appli-
cable)

H W F - - - - -

Claimant

Surrey County Council
Woodhatch Place, 11 Cockshot Hill, Reigate,
Surrey RH2 8EF

SEAL

Defendant(s)

- (1) Lorraine Castle (aka Lorraine Brown) of Cherry Blossom (formerly Kew Garden), Antlands Lane East, Shipley Bridge, Horley, Surrey, RH6 9TE
(2) Edward Cooper of Crosswinds, Collendean Lane, Norwood Hill, Surrey

See continuation sheet

Does your claim include any issues under the Human Rights Act 1998?

☐ Yes

☒ No

Details of claim (see also overleaf)

The Claimant claims an injunction pursuant to s187B of the Town and County Planning Act 1990 to restrain the Defendants who are acting in breach of planning control.

Please see attached Details of Claim, Draft Interim Order and Draft Final Order, together with the witness statement and exhibits of Mitchel Pugh dated 19th February 2025

CPR Part 8 applies to this claim.

The Claimant respectfully requests, in view of the issues set out in the Details of Claim and witness statement referenced above, that the Court grants an interim injunction order as per the Draft Interim Order attached and in due course the Final Order attached.

Defendant's name and address

(1) Lorraine Castle (aka Charmaine Lorraine Brown) of Cherry Blossom (formerly) Kew Garden, Antlands Lane East, Shipley Bridge, Horley, Sy, RH6 9TE & others detailed on continuation sheet

£

Court fee

391

Legal representative's
costs

Issue date

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

Details of claim (continued)

See attached details of claim

Melissa Clarke, Surrey County Council
Legal and Democratic Services,
Woodhatch Place, 11 Cockshot Hill,
Reigate,
Surrey, RH2 8EF


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.

Statement of Truth

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 believe that the facts stated in these particulars of claim are true.
- ☒ The Claimant believes that the facts stated in these particulars of claim are true. I am authorised by the claimant to sign this statement.

Signature



- ☒ Claimant
- ☐ Litigation friend (where claimant is a child or a Protected Party)
- ☐ Litigation Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
30	04	2025

Full name

Melissa Clarke

Name of claimant's legal representative's firm

Surrey County Council, Legal and Democratic Services

If signing on behalf of firm or company give position or office held

Senior Solicitor

Continuation sheet –

Defendants continued –

- 3) John Bruce of 7 Crosswinds, Collendean Lane, Norwood Hill, Surrey
- 4) John Smith of Crosswinds, Collendean Lane, Norwood Hill, Surrey
- 5) Mark Sulman of Crosswinds, Collendean Lane, Norwood Hill, Surrey
- 6) Thomas Kefford of Crosswinds, Norwood Hill, Collendean Lane, Crawley, Sussex
- 7) Albert Hilden of Crosswinds, Colendean Lane, Norwood Hill, Surrey
- 8) Caleb Jones care of Plot 2, Crosswinds, Collendean Lane, Horse Hill, Norwood Hill, Surrey
- 9) Fanny Eastwood of 6 Batts Bridge Caravan Site, Maresfield, Uckfield, East Sussex
- 10) Ben Brown (aka Benny Brown) of Cherry Blossom (formerly Kew Garden), Antlands Lane East, Shipley Bridge, Horley, Surrey, RH6 9TE
- 11), Fuller Grab Hire Limited, S202 Weston House, The Maltings, Station Road, Sawbridgeworth, Herts, CM21 9FP
- 12) Persons unknown