

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE MR JUSTICE LAVENDER
15 SEPTEMBER 2026

BETWEEN:

EAST HERTFORDSHIRE DISTRICT COUNCIL



Claimant

-and-

- (1) PERSONS UNKNOWN CARRYING OUT, ENCOURAGING AND/OR
FACILITATING DEVELOPMENT ON, OR WITH AN INTENT TO
UNDERTAKE DEVELOPMENT ON, THE LAND ON SOUTH WEST SIDE
OF SHEERING MILL LANE, SAWBRIDGEWORTH AS SHOWN EDGED IN
RED ON THE MAP ATTACHED TO THIS ORDER
- (2) PERSONS UNKNOWN OCCUPYING OR INTENDING TO OCCUPY THE
LAND ON SOUTH WEST SIDE OF SHEERING MILL LANE,
SAWBRIDGEWORTH AS SHOWN EDGED IN RED ON THE MAP
ATTACHED TO THIS ORDER
- (3) ~~LEONARD RICHARDS~~
(4) ~~DARREN GLOVER~~
(5) EVAN MCCARTHY
(6) ANDREW CASH
(7) FREDa CONNORS
(8) MIKEY CASH

Defendants

INTERIM INJUNCTION ORDER

PENAL NOTICE

**IF YOU THE ABOVE NAMED DEFENDANTS DO NOT COMPLY WITH THIS
ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND YOU MAY
BE IMPRISONED OR FINED OR YOUR ASSETS MAY BE 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 IN CONTEMPT OF COURT AND MAY BE
IMPRISONED, FINED, OR HAVE THEIR ASSETS SEIZED.**

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST FOR BREACH OF PARAGRAPH 4 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY PERSON WHO BREACHES PARAGRAPH 4 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT.

Note to Arresting Officer: Where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 (“PJA 2006”):

- i. The defendant shall be brought before the judge within a period of 24 hours beginning at the time of their arrest**
- ii. You should inform East Hertfordshire District Council of the arrest as soon as reasonably practicable.**

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it all carefully. You are advised to consult a solicitor as soon as possible. You have a right to ask the Court to vary or discharge this Order.

If you are in any doubt about whether an action or activity on the Land is prohibited by the Order you should seek written permission from the Claimant before carrying out that action or activity.

If you disobey this Order you may be found guilty of Contempt of Court and you may be sent to prison or fined or your assets may be seized.

UPON the Claimant’s urgent application without notice for an injunction pursuant to section 187B of the Town and Country Planning Act 1990, dated 29 August 2026

AND UPON the Claimant’s further urgent application without notice dated 30 August 2026 pursuant to that section and to s. 222 of the Local Government Act 1972

AND FURTHER TO the Order made by the Honourable Mr Justice Coppel on 30 August 2026

AND UPON a return date hearing being listed on 15 September 2026 on notice to the Defendants

AND UPON READING the evidence in the Claimant's Hearing Bundle and Supplementary Bundle

AND UPON HEARING from counsel for the Claimant, Mr Michael Fry, and the Defendants not appearing

IT IS ORDERED THAT:

DEFINITIONS AND PARTIES

1. In this Order:
 - a. "the Land" means the land registered under titles HD418207 and HD623130 as more particularly shown on the plan attached to this Order edged red at Schedule A. The address of the Land is Land on the south west side of Sheering Mill Lane, Sawbridgeworth.
 - b. "development" means building, engineering, mining or other operations in, on, over or under land, or the making of a material change in the use of buildings or other land.
2. Leonard Richards (D3) and Darren Glover (D4) are removed as named defendants to whom this Order applies.
3. Evan McCarthy (D5), Andrew Cash (D6), Freda Connors (D7), and Mikey Cash (D8) are added as named defendants to the claim and as named defendants to whom this Order applies.

INJUNCTION IN FORCE

4. With immediate effect and until further order, the Defendants and each of them, whether by themselves or by instructing, encouraging or permitting any other person, **must not carry out development on the Land in breach of planning control or carry out any works or activities which are, or could, serve as being preparatory works or activities to enable or support development of the Land.** In particular, but not exclusively, the Defendants must not on the Land, without written permission from the Claimant:
 - a. carry out any further development;
 - b. clear any further land;
 - c. lay hardstanding;
 - d. lay bitumen;
 - e. lay gravel;

- f. erect any fencing;
- g. erect any gates;
- h. construct any road on the Land;
- i. create any further access to the Land;
- j. remove or damage any hedgerow on the Land;
- k. install any camera or CCTV equipment;
- l. bring onto the Land or any part thereof or keep on the Land any plant or machinery used or capable of being used for the development of the Land;
- m. use any plant or machinery capable of being used for the development of the Land on the Land;
- n. bring onto the Land, or station on the Land, any caravans, vehicles or mobile homes;
- o. permit occupation of any caravan or mobile home already on the Land;
- p. install any septic tank or carry out any associated works on the Land; or
- q. install or lay on the Land any electric cable, water pipe or any other infrastructure or carry out any associated works on the Land.

POWER OF ARREST

- 5. Any person breaching paragraph 4 of this Order may be arrested pursuant to s. 27 PJA 2006.

SERVICE BY ALTERNATIVE METHOD

- 6. The Court will provide sealed copies of this Order to the Claimant's solicitors for service. In order that the sealing of the Order does not delay its service, the Claimant is permitted to serve the Order made by the Court immediately after it is so made, but must exchange the Order served on the Land with the sealed version without 24 hours of receipt of the sealed Order.
- 7. Pursuant to CPR 6.27 and 81.4:
 - a. the Claimant shall serve this Order upon D1 and D2 by affixing sealed copies of this Order in a transparent waterproof document wallet in prominent positions on or at the boundary of the Land, and by placing it on any caravan or mobile home which has been stationed on the Land.
 - b. Such affixing or placing shall be deemed to be good and sufficient service on D1 and D2.

- c. the Claimant shall serve this Order upon D5, D6 and D7 by emailing a copy of the Order to their planning consultant, Mr White, at the email address info@whiteplanning.co.uk.
 - d. the Claimant shall serve this Order upon D8 by emailing a copy of the Order to Mr Bhandal, of Couchman Hanson, at the email address v.bhandal@couchmanhanson.co.uk.
 - e. Any future documentation may be served on the Defendants in the same manner.
8. Service in accordance with paragraph 7 above shall be verified by a certificate of service filed with the Court.

FURTHER DIRECTIONS

9. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimant's solicitors immediately by email at the details set out below providing at least 48 hours' written notice of any hearing. If any evidence is to be relied upon in support of such an application the substance of it must be communicated in writing to the Claimant's solicitor at least 24 hours in advance of the hearing. The hours between 5pm on any Friday and 9am on any Monday cannot be counted as part of the relevant notice period.
10. Any person applying to vary or discharge this Order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings.
11. The Claimant has liberty to apply to extend or vary this Order or for further directions.
12. The costs of this application are reserved to be dealt with by the Judge who tries this Claim.
13. Should the Claimant become aware of the identity of any of the persons currently encompassed within Persons Unknown it shall apply, as soon as reasonably

practicable thereafter, to join that individual to these proceedings as a named defendant.

14. The named Defendants shall provide written notification in writing to the Claimant 5 working days before they intend to transfer any part of their interest in the Land or grant any lease, sub-lease, assignment, demise, sub-demise or licence relating to the Land to anyone else. Such notification shall include particulars of the new party with an interest in the Land.
15. The hearing of the Claim shall now be listed by the Court to be heard on the first available date after 1 January 2027 with a time estimate of one day (“**the Final Hearing**”). The Court shall fix this hearing as soon as possible and provide notice of the hearing to the parties. The parties shall liaise with the Court and provide dates to avoid by 4pm on Friday 25 September 2026 in light of the following directions. The parties must keep the need for a hearing, and the time estimate of the hearing, under review and notify the Court immediately if estimates change.
16. By 4pm on the date eight weeks before the Final Hearing, the parties must file and serve any evidence upon which they wish to rely at the hearing of the substantive application (or if that date is a weekend or public holiday, by 9am on the next business day).
17. By 4pm on the date six weeks before the Final Hearing, each party is to file and serve any further evidence in reply which it wishes to rely upon at the hearing of the substantive application (or if that date is a weekend or public holiday, by 9am on the next business day).
18. By 4pm on the date four weeks before the Final Hearing, the parties are to have agreed directions to trial between themselves ensuring that the Court is kept informed of when hearing and authorities bundles and skeleton arguments will be filed and served.
19. If the Final Hearing is adjourned or delayed beyond 15 September 2027, this Order shall be reviewed at a hearing no later than 8 October 2027 (or as near to that date as the Court can reasonably accommodate), with a time estimate of 1 hour, unless the

Claimant indicates to the Court that it does not seek continuation of the Order, upon which the Order will expire as against D1 and D2. The Claimant is responsible for arranging the listing of the hearing, and proposing any necessary directions, which directions are to be served on D1 and D2 in accordance with paragraph 7 above.

COMMUNICATIONS WITH THE CLAIMANT

20. The Claimant's solicitors and their contact details are: FAO: Simon Kiely, Sharpe Pritchard LLP, Elm Yard, 10-16 Elm Street, London WC1X 0BJ, skiely@sharpepritchard.co.uk, 020 7405 4600, Ref. SK/2801/137

BY THE COURT

MADE ON 15 SEPTEMBER 2026

GUIDANCE NOTES

Effect of this Order

1. A Defendant who is an individual who is ordered not to do something must not do it personally or in any other way. They must not do it through others acting on their behalf or on their instructions or with their encouragement.
2. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees, or agents or in any other way.

Effect of this Order on Parties other than the Defendants

3. It is a contempt of court for any 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 his assets seized.

Communications with the Court

4. All communications to the Court about this Order should be sent to Room WG 08, Royal Courts of Justice, Strand, London, WC2A 2LL (020 7947 6010). The offices are open between 10 am and 4:30pm Monday to Friday.

Pursuant to CPR Part 40.7(1) this order takes effect from the date it was made, i.e the date on the face of the Order.

SCHEDULE A – PLAN OF THE LAND

