

Statement on behalf of the  
Claimant  
Witness: Andrew Culley  
8<sup>th</sup> Statement  
Dated: 01/07/2026  
Exhibits: AC/236 to AC/291

**IN THE HIGH COURT OF JUSTICE**

**Claim No. KB-2025-001812  
Matter No. KB-2025-001739**

**B E T W E E N : -**

**TUNBRIDGE WELLS BOROUGH COUNCIL**

**Claimant**

**And**

- (1) Bill Lee**
- (2) Bill Leonard Lee**
- (3) Wesy Bill Wally Lee**
- (4) Roy Christopher Draper**
- (5) Albie John Wilkins**
- (6) Persons Unknown**
- (7) Keith Jeeves**
- (8) Curtis Love**
- (9) Bonny Harbour**
- (10) Jonny Bigmore**

**Defendants**

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**EIGHTH WITNESS STATEMENT OF ANDREW CULLEY**

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I, Andrew Culley, Planning Compliance Officer for Tunbridge Wells Borough Council of Town Hall, Royal Tunbridge Wells, Kent TN1 1RS.

*WILL SAY as follows:-*

1. I make this statement in support of the Claimant's Claim for an injunction against the Defendants, pursuant to section 187B of the Town and Country Planning Act 1990

(as amended) ("the 1990 Act"). I am duly authorised by the Claimant to make this witness statement and I make it from my own information, knowledge and belief save where otherwise stated.

2. I make this further witness statement in support of the Claimant's application to continue/vary the injunction granted by Mr Justice Lavender on 6<sup>th</sup> June 2025 which was extended on 4<sup>th</sup> June 2026 until further order by Malcolm Sheehan KC Sitting as a Deputy Judge of the High Court.
3. On Monday 1<sup>st</sup> June 2026 at approximately 17:10 hours I attended the land between Kilndown Poultry Farm and Evanden Farm, Church Road, Kilndown, Cranbrook, Kent ("the Land") with my colleague LEANNE TARLING (Planning Investigations Officer), to serve packs which included a copy of 'Notice of Change of legal representative (dated 01/06/26)' for the application to the High Court to continue/vary the Injunction Order dated 6<sup>th</sup> June 2025, and a QR code to access the hearing bundle filed with the court. I exhibit copies of the covering letters as **AC/236 to AC/245**, a copy of the Notice of Change of legal representative which I exhibit as **AC/246** as follows:
  - i. On the gate of plot 6, 3 packs with covering letters addressed to BILL LEE, BILL LEONARD LEE, and PERSONS UNKNOWN, I exhibit photos **AC/247** and **AC/248**
  - ii. On the gate of plot 5, 2 packs with covering letters addressed to ALBIE JOHN WILKINS and PERSONS UNKNOWN I exhibit photos as **AC/249** and **AC/250**
  - iii. On a post to the entrance to Plot 4, 4 packs with covering letters to KEITH JEEVES, BONNY HARBOUR, JONNY BIGMORE and PERSONS UNKNOWN I exhibit photos as **AC/251 to AC/253**
  - iv. On the gate post to plot 3, 2 packs with covering letters to WESY BILL WALLY LEE and PERSONS UNKNOWN I exhibit photos as **AC/254** and **AC/255**
  - v. On the gate of plot 2, 4 packs with covering letters to ROY CHRISTOPHER DRAPER, BILL LEE, BILL LEONARD LEE and PERSONS UNKNOWN I exhibit photos as **AC/256 to AC/258**
  - vi. On a post rail of plot 1, 2 packs with covering letters to CURTIS LOVE and PERSONS UNKNOWN I exhibit photos as **AC/259** and **AC/260**

4. When putting the packs on the gate of plot 5, the previous packs put on the gate on Tuesday 26<sup>th</sup> May 2026 had been removed. On previous occasions when packs had been placed here, they had not been removed and this gate is set back into the hedgerow and not generally visible at this time of year when driving due to vegetation. Whilst I cannot confirm, it does seem to me likely that the owner or a person with interest has been to the plot.
5. I also posted 6 packs at Five ways Post Office 35 Grosvenor Road, Tunbridge Wells which I exhibit the proof of postage as **AC/261** which were posted to:
  - i. Curtis Love, The Meadows, Breach Lane, Upchurch, Sittingbourne ME9 7PE
  - ii. Roy Christopher Draper, Hill View, Meadow Lane, Runwell, Wickford SS11 7DX
  - iii. Wesy Bill Wally Lee , Four Oaks, Church Hill, Boughton Monchelsea, Maidstone ME17 4BU
  - iv. Albie John Wilkins, Hawksbill, Morley Lane, Bicker, Boston PE20 3DP
  - v. Bill Lee, Four Oaks, Church Hill, Boughton Monchelsea, Maidstone ME17 4BU
  - vi. Bill Leonard Lee, Four Oaks, Church Hill, Boughton Monchelsea, Maidstone ME17 4BU
6. On the 2nd June 2026 I emailed KEITH JEEVES to advise him of the documents which had been served on the land and also attached a copy of the covering letter and the Notice of Change of legal representative.
7. I understand that on 2<sup>nd</sup> June 2026, the owner of Hawksbill, Morley Lane, Bicker called HEATHER STEVENS, Team Leader (Contentious) at Mid Kent Legal Services, stating that he had received the letter addressed to ALBIE JOHN WILKINS, who does not live at the address and the owner does not know him.
8. On 3<sup>rd</sup> June 2026, I called KEITH JEEVES as I had a missed call and answer machine message asking to call him. He started by apologising for the swearing and language used last time I spoke to him, and for the trouble he had caused me by doing everything to the land and if STUART CARRUTHERS hadn't have said to just pull on the land he would never have done so. I spoke to him about the removal of the hardstanding, I advised him that although I understand fields do have some stones there was still a large amount of stone and brick pieces, if he was to rake and pick

them out, then this would satisfy me that the removal of the hardstanding for the Enforcement Notice was completed. He said he would get that done in the next fortnight along with removing the waste pipes and any other rubbish. That would just leave the planting of the hedgerow in the autumn which he would do providing he hasn't sold the land by then.

9. On the 4<sup>th</sup> June 2026 I attended the hearing at the Royal Courts of Justice. At the hearing CURTIS LOVE was present (this was the first time I had seen him), with his father DANNY LOVE who he wanted to speak on his behalf and WESY LEE's father. They all appeared to know each other. This was the first time I had met CURTIS LOVE. He appeared to be of a similar age to BILL LEONARD LEE, WESY LEE, BONNY HARBOUR and JONNY BIGMORE which makes me further believe that the Land had been purchased for them all to set up residence on the land.
10. At the hearing, as Curtis Love objected to the continuation of the Order, and confirmed that he wished to submit formal evidence, the hearing was adjourned.
11. Following the hearing, on 5<sup>th</sup> June 2026 at approximately 14:30 hours I attended the Land with my colleague LEANNE TARLING (Planning Investigations Officer), to serve packs which included a covering letter containing a QR code to access the court paper work and a copy of the injunction order dated 4<sup>th</sup> June 2026. I exhibit copies of the covering letters as **AC/262 to AC/271**. these were served in the following places:
  - i. On a stake in plot 1, 1 pack addressed to persons unknown and a copy of the Order printed on waterproof paper. I exhibit photos as **AC/272 and AC/273**
  - ii. On a post rail of plot 1, 2 packs with covering letters to CURTIS LOVE and PERSONS UNKNOWN I exhibit photos as **AC/274 and AC/275**
  - iii. On the gate of plot 2, 4 packs with covering letters to ROY CHRISTOPHER DRAPER, BILL LEE, BILL LEONARD LEE and PERSONS UNKNOWN I exhibit photos as **AC/276 to AC/278**
  - iv. On the gate post to plot 3, 2 packs with covering letters to WESY BILL WALLY LEE and PERSONS UNKNOWN I exhibit photos as **AC/279 and AC/280**
  - v. On a post to the entrance to Plot 4, 4 packs with covering letters to KEITH JEEVES, BONNY HARBOUR, JONNY BIGMORE and PERSONS UNKNOWN I exhibit photos as **AC/281 to AC/283**

- vi. On the gate of plot 5, 2 packs with covering letters addressed to ALBIE JOHN WILKINS and PERSONS UNKNOWN I exhibit photos as **AC/284 and AC/285**
  - vii. On the gate of plot 6, 3 packs with covering letters addressed to BILL LEE, BILL LEONARD LEE, and PERSONS UNKNOWN, I exhibit photos **AC/286 and AC/287**
12. I also posted 5 packs, using the post room at Tunbridge Wells Borough Council and received a copy of the recorded delivery references which I exhibit as **AC/288**. The packs were sent to:
- i. Curtis Love, The Meadows, Breach Lane, Upchurch, Sittingbourne ME9 7PE
  - ii. Roy Christopher Draper, Hill View, Meadow Lane, Runwell, Wickford SS11 7DX
  - iii. Wesy Bill Wally Lee , Four Oaks, Church Hill, Boughton Monchelsea, Maidstone ME17 4BU
  - iv. Bill Lee, Four Oaks, Church Hill, Boughton Monchelsea, Maidstone ME17 4BU
  - v. Bill Leonard Lee, Four Oaks, Church Hill, Boughton Monchelsea, Maidstone ME17 4BU
13. I also emailed to KEITH JEEVES and CURTIS LOVE copies of their respective covering letters together with the Injunction Order dated 4 June 2026 and advised that copies had also been served on the land.
14. On 22<sup>nd</sup> June 2026, I received a copy of an email sent by CURTIS LOVE to HEATHER STEVENS which was subsequently forwarded to me. The email itself is not a sworn statement and does not contain a statement of truth. Within the email, CURTIS LOVE states that the purchase of the land was for investment purposes only. I find this assertion difficult to reconcile with the nature of the land, particularly given the improbability of it being held as an investment without any intention of future development.
15. According to HM Land Registry records, CURTIS LOVE purchased the land for £60,000 on 8 August 2024 (exhibit **AC/127** of my witness statement 6). This is notably higher than comparable nearby plots: Plot 2, of a similar size, was purchased for

£20,000 on 4 September 2024 by ROY CHRISTOPHER DRAPER (exhibit **AC/128** of my witness statement 6), and Plot 3, approximately double the size, was purchased for £18,000 on 4 September 2024 by WESY BILL WALLY LEE (exhibit **AC/129** of my witness statement 6).

16. CURTIS LOVE's email further states: *"If in future I decide to do anything with the land, I would do it right way and not break my laws."* This wording is ambiguous. It may reflect a language error, as the phrase "my laws" is unclear and may not refer to planning legislation. In any event, if it is a typo and should state "any", it does still reveal an intention to develop the Land in the future. As it is an email, it cannot be taken as a guarantee that planning legislation would not be breached.
17. Furthermore, the likelihood of lawful development on the land is extremely limited, as outlined in Policy and Considerations by LUCINDA ROACH exhibited in my witness statement 6.
18. On the 25<sup>th</sup> June 2026 HEATHER STEVENS made me aware that she had received a call from ALBIE WILKINS and that she had advised him to seek legal advice and had provided her with an email address. I attach a note of her call with him as Exhibit **AC/289** and an email sent to ALBIE WILKINS as Exhibit **AC/290**.
19. On 1 July 2026, I received an email from Goudhurst Parish Council with an undated letter attached. The letter has not informed the Council's decision-making process in relation to action on the Land. However, I exhibit the letter as **AC/291** to provide further context in relation to the Land and the area and any potential development.

I believe that 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: 01/07/2026