

Statement on behalf of the Claimant

Witness: Leanne Tarling

4th Statement

Dated: 19/04/26

Exhibits:LT69 – LT87

IN THE HIGH COURT OF JUSTICE

CLAIM NO. KB-2026-001144

BETWEEN:-

TUNBRIDGE WELLS BOROUGH COUNCIL CLAIMANT

and

(1) DANNY MAURICE DARLING

(2) PERSONS UNKNOWN

DEFENDANTS

FOURTH WITNESS STATEMENT OF LEANNE TARLING

I, Leanne Tarling, Planning Investigation Officer for Tunbridge Wells Borough Council of Town Hall, Royal Tunbridge Wells, Kent TN1 1RS

WILL SAY as follows:-

1. My duties as a Planning Investigation Officer include investigation of, and enforcement against, breaches of planning control in the Borough of Tunbridge Wells.
2. I make this statement further to my first, second and third witness statements 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.

3. On 10th April 2026 an interim injunction was granted by Mrs Justice Stacey at the High Court (“the Interim Injunction Order”). The application was made by the Claimant without notice as there had been breaches of planning control and the Claimant apprehended a change of use of the Land without the Interim Injunction Order.

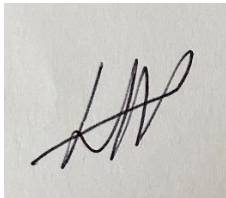
Update on Service and activity on the Land

4. On 17th April 2026 I posted a covering letter (Exhibit LT69) (with a QR code link to all the Application documents) and Application Notice in relation to the hearing on 20th April 2026 to the address of the registered owner of the land, Danny Maurice Darling, by Royal Mail Special Delivery Guaranteed 1pm. On tracking the delivery of the letter I can see that on the 18th April 2026 the recipient refused to accept it, see Exhibit LT70.
5. My colleague and I returned to the Land at approximately 15:55 on the 17th April 2026 after anonymous reports that people had returned to the Land. On arrival I could see that the large flatbed truck had been removed from adjacent to the Land, Exhibit LT71, and that the water pipe that was previously on the truck, was now placed on the Land on top of the laid hardcore, see Exhibit LT72 and LT73. In addition, the Injunction pack and cover letter I had served on the Land had again been removed, see Exhibit LT74.
6. On the Land two timber batons had been hammered into the ground in what looks like an attempt to mark out an area, along with this were two sleepers/scaffolding boards marking out what looks to be a large rectangular area, see Exhibits LT75, LT76, LT77, LT78, LT79, LT80, LT81, LT82, and LT83.
7. I attached further copies of the Injunction Order, Application Notice and cover letters (Danny Maurice Darling, and Persons Unknown) on the Land, see Exhibit LT84 and LT85.

8. The Injunction Order and cover letters had been removed from the wooden post at the gated entrance to the Land, see Exhibit LT86. I attached new copies of the Injunction Order and cover letters on the gate, Exhibit LT86.
9. I also attached the Application Notice and new cover letters (Danny Maurice Darling, and Persons Unknown) to the gate besides the PROW, see Exhibit LT87. I did not attach a new Injunction Order at this point as it was still in position from the last visit. At both other points of service, the gated entrance and directly on the Land, the Injunction Order and cover letters have been removed each time they have been displayed.

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:

A square image showing a handwritten signature in black ink on a light-colored background. The signature is stylized and appears to consist of several overlapping loops and lines.

Date: 19.04.2026