

On behalf of: Claimants  
Timothy Robins  
1st statement of witness  
Exhibits: None  
Date: 26 May 2022

**Claim No. QBD-2022-BHM-000044**

**IN THE HIGH COURT OF JUSTICE  
QUEENS BENCH DIVISION  
BIRMINGHAM DISTRICT REGISTRY  
Between:**

**(1) HIGH SPEED TWO (HS2) LIMITED  
(2) THE SECRETARY OF STATE FOR TRANSPORT**

**Claimants**

**-and-**

- (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND KNOWN AS LAND AT CASH'S PIT, STAFFORDSHIRE SHOWN COLOURED ORANGE ON PLAN A ANNEXED TO THE ORDER DATED 11 APRIL 2022 ("THE CASH'S PIT LAND")**
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND ACQUIRED OR HELD BY THE CLAIMANTS IN CONNECTION WITH THE HIGH SPEED TWO RAILWAY SCHEME SHOWN COLOURED PINK, AND GREEN ON THE HS2 LAND PLANS AT <https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings> ("THE HS2 LAND") WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES**
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS**
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS**
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE) AND 58 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM**

**Defendants**

---

**WITNESS STATEMENT OF TIMOTHY ROBINS**

---

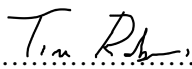
I, **Timothy Robins**, of High Speed Two (HS2) Limited, Two Snow Hill, Snow Hill Queensway, Birmingham, B4 6GA, WILL SAY as follows:

1. I am the First Claimant's Head of Environment - Route Wide for Phase One. Until recently I managed a team of environmental managers and specialist responsible for working with our Enabling Works Contractors to deliver works in accordance with our environmental requirements. It was under these contracts that the majority of the ecological mitigation works undertaken to date have been delivered. I am authorised to make this statement on behalf of the Claimants.
2. This statement has been prepared with the Claimants' legal representatives. This statement is made from matters that are within my own knowledge and/or (unless other sources of information are stated) knowledge gained from my review of the First Claimant's documents. The contents of this statement are true to the best of my knowledge and belief.
3. I understand from the Claimants' legal representatives that a number of allegations were made in Court today by named defendants and other individuals that the First Claimant has been prosecuted / fined for "wildlife crimes".
4. I understand that those making the allegations did not precisely define what "wildlife crime" for which they alleged that the First Claimant had been prosecuted.
5. The Crown Prosecution Service says: "*Wildlife crime can be defined as any action which contravenes current legislation governing the protection of wild animals and plants.*" (see: <https://www.cps.gov.uk/legal-guidance/wildlife-offences#:~:text=Wildlife%20crime%20can%20be%20defined,Hunting%20Act%202004%20legal%20guidance> ). In the absence of a definition from those making the allegations, I have adopted this definition for the purposes of this statement ("**Wildlife Crime**").

6. I confirm that the First Claimant has never been prosecuted (whether by the police or any other relevant regulatory or other body such as the Environment Agency or Natural England) for a Wildlife Crime. It follows, but again I confirm for completeness, that the First Claimant has never been fined in relation to the commission of a Wildlife Crime.

Statement of Truth

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:..........

TIMOTHY ROBINS

Dated:.....26 May 2022.....