

On behalf of: Applicants/Claimants  
J.A Dilcock  
10th statement of witness  
Exhibits: None  
Date:03.03.2023

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

**IN THE HIGH COURT OF JUSTICE  
KINGS BENCH DIVISION  
BIRMINGHAM DISTRICT REGISTRY**

**Between:**

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

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**TENTH WITNESS STATEMENT OF JULIE AMBER DILCOCK**

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


1. I am a solicitor of the Senior Courts of England and Wales and employed by the First Claimant as Head Counsel - L&P Disputes. My role involves advising the First Claimant and instructing and assisting external legal advisers advising and representing the First Claimant and in that capacity my role includes instructing our external legal advisers, DLA Piper UK LLP, in relation to the conduct of these proceedings. I am authorised to make this, my Tenth Witness Statement, on behalf of the Claimants.
2. This statement has been prepared with the Claimants' legal representatives.
3. I make this witness statement in support of the Claimants' application for directions (the "**Directions Application**") for the conduct of these proceedings up to the hearing that has been listed for 16.05.2023 (the "**Review Hearing**"). This statement contains matters that are within my own knowledge, whether directly or resulting from matters reported to me – both orally and in writing. Where matters are based upon information received from a third party I identify the third party source and why I believe the truth of the matters stated.
4. In the Directions Application, the Claimants seek a direction for service of documents relating to the Review Hearing and these proceedings going forward more generally. As the court will see, the directions for service proposed by the Claimants in the draft order are almost identical to those ordered by Mr. Justice Julian Knowles in a prior directions order dated 28.04.2022 (the "**April 2022 Directions Order**").
5. As part of the service provisions previously authorised by the court in the April 2022 Directions Order, documents relating to these proceedings to date have been uploaded to the website: <https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings> (defined as: the "HS2 Proceedings Website" in the Order of Mr Justice Julian Knowles dated 20.09.2022). The Claimants seek a direction to host documents going forward on the following website: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings> (the "**RWI Updated Website**"). In this statement, I have set out the reasons for the requested change.

6. It has been explained to me by the Head of Digital Media and Content for the First Claimant that the .gov.uk website has two different types of document hosting webpages: publications and collections. Publications are designed to hold smaller numbers of documents – typically up to 100. Collections can hold many, many more documents. The current HS2 Proceedings Website is a publications type webpage. At the time of writing this statement it has 109 documents uploaded to it and has almost reached capacity. It is not therefore an option to continue to use it to host substantial volumes of documents going forward.
  
7. The RWI Updated Website has been created but is not yet live and is a collections type webpage. It will have the capacity to hold both the documents already on the HS2 Proceedings Website and all further documents in these proceedings.
  
8. If permission is granted by the court, the Claimants will:
  - 8.1. Place a copy of the directions order made by the Court on the HS2 Proceedings Website.
  - 8.2. Place a notice on the HS2 Proceedings Website that in future documents will be uploaded to the RWI Updated Website and include a link to the RWI Updated Website.
  - 8.3. Retain the HS2 Proceedings Website unless and until the court considers that at some future date it is no longer necessary to do so.
  - 8.4. Place copies of all the documents already uploaded to the HS2 Proceedings Website on the RWI Updated Website.

9. Anyone who has registered on the HS2 Proceedings Website for notifications when that page is updated will receive notifications when steps 7.1 and 7.2 are completed and will therefore be alerted to the existence of the new RWI Updated Website and can also register for notifications on that page.

**Statement of Truth**

I believe that the facts in this witness statements 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  .....

Name: JULIE AMBER DILCOCK

Dated: 3 March 2023