

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY**

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

**CORE BUNDLE
(Volume C)
*for hearing on 16 May 2023***

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28	Email from Alan T Cooper to DLA Piper dated 1 April 2023	CORE-C-243 to CORE-C-246

DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2IX

Telephone: 0114 283 3312
Email: HS2Injunction@dlapiper.com
Reference: RXS/380900/401

Solicitors for the Claimants

DLA Piper
DX 708580
Sheffield 10

101 Princess Road
Moss Side
Manchester
M14 4RB

DX: 14315 MANCHESTER

Tel: 0161 227 7777

Our Ref: NH2:LF:KNA001.001
Date: 29th March 2023

Dear Sirs

Defendant No: 6 James Knaggs - (QB-2022-BHM-000044)

I write with reference to the above and confirm that I am liaising with my client to see if there are any further representations that need to be made in relation to this matter.

I will inform you closer to the date as to whether there is any intention to make any submissions.

I do note as a matter of courtesy to yourself and in particular to the family of defendant No: 60 by the name of Xavier, that this defendant has passed away. Clearly, It would be most distressing if communications continued to be received and I would ask therefore that you note this and remove defendant No: 60 from the communications. This means the family will not be served in distressing circumstances.

Yours faithfully

Nicola Hall

Robert Lizar Solicitors
Contact: Nicola Hall
Direct Dial: 07766142584
Email: nhall@robertlizar.com
CJSM Email: nicola.hall@robertlizar.cjsm.net

For 24 Hour Emergency Police Station Advice call: 07900 998 999

Robert Lizar Solicitors is the trading name of Robert Lizar Solicitors Limited (Company Number 06631097)
Registered Office: 101 Princess Road, Manchester M14 4RB

Directors: Robert Lizar, Adam Foster

Authorised & Regulated by the Solicitors Regulation Authority - ID No. 567190
(We do not accept service of document via facsimile or email)

www.robertlizar.com



DLA Piper
DX 708580
Sheffield 10

101 Princess Road
Moss Side
Manchester
M14 4RB

DX: 14315 MANCHESTER

Tel: 0161 227 7777

Our Ref: NH2:LF:KNA001.001

Date: 11th April 2023

Dear Sirs

Secretary of State for Transport & HS2 Ltd v James Knaggs & Ors

We write further to the above and understand that submissions were due by 16.00 hrs this afternoon.

We do anticipate further submissions on behalf of Mr Knaggs particularly dealing with some of the novel aspects of the amendment.

We are sure you will be aware of the constraints with which the defendants work in relation to this case particularly financially and in those circumstances, apologise if matters are late. We will seek to ensure that matters are brought to the attention of the court at the earliest possible opportunity but do note that we are working within a very difficult set of constraints which do limit our ability to comply precisely with court orders.

Yours faithfully

Nicola Hall

Robert Lizar Solicitors

Contact: Nicola Hall

Direct Dial: 07766142584

Email: nhall@robertlizar.com

CJSM Email: nicola.hall@robertlizar.cjasm.net

For 24 Hour Emergency Police Station Advice call: 07900 998 999

Robert Lizar Solicitors is the trading name of Robert Lizar Solicitors Limited (Company Number 06631097)
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CORE-C-4

Mary Barraclough

From: HS2Injunction
Sent: 13 April 2023 12:17
To: Nicola Hall
Cc: oweng@gclaw.co.uk
Subject: FW: Defendant No: 6 James Knaggs - (QB-2022-BHM-000044) [DLAP-UKMATTERS.FID6569426]
Attachments: Letter - to DLA Piper (HS2) Defendant No_ 6 James Knaggs - (QB-2022-BHM-000044).pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs / Madams

We refer to your letter of 11 April 2023 and note that you anticipate providing further submissions on behalf of Mr. Knaggs.

You were made aware of our clients' application for directions on 13 March 2023. You were then served with the Directions Order made by the court by email on 16 March 2023 at 21:43.

The court has set the directions for this matter that it considered appropriate. The Directions Order is very clear that if Mr. Knaggs wishes to amend the Injunction Order or oppose our clients' application, he must file with the court and serve a statement of case and any evidence upon which he seeks to rely by 4pm on 11 April 2023.

That deadline has now passed.

If Mr. Knaggs' now intends to submit evidence after the deadline in the Directions Order a formal application will need to be made to the court for this evidence to be admitted. Our clients expect that application to be made in sufficient time ahead of the hearing listed for 16 May 2023 in order that they have time to: (i) consider that application; (ii) file evidence in response (if necessary); and (iii) have a viable amount of time to prepare for the hearing.

Yours faithfully

DLA Piper UK LLP

From: Lorna Frazer
Sent: Tuesday, April 11, 2023 3:31:11 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: HS2Injunction; oweng@gclaw.co.uk
Cc: civilappeals.cmsa@justice.gov.uk
Subject: Defendant No: 6 James Knaggs - (QB-2022-BHM-000044)

****EXTERNAL****



Lorna Frazer
Senior Legal Secretary / IT Support, Robert Lizar Solicitors

t: 0161 227 7777 | d: 0161 441 3287
e: lfrazer@robertlizar.com | w: www.robertlizar.com
a: 101 Princess Road, Manchester, M14 4RB

Mary Barraclough

From: HS2Injunction
Sent: 05 April 2023 14:49
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]. Attn Her Honour Judge Emma Kelly

Follow Up Flag: Follow up
Flag Status: Completed

From: Bali, VikasOn Behalf OfKB.Birmingham
Sent: Wednesday, April 5, 2023 2:48:55 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: Mark Keir
Cc: HS2Injunction
Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]. Attn Her Honour Judge Emma Kelly

****EXTERNAL****

Dear Sir/Madam

Your email below has been referred to Her Honour Judge Emma Kelly, the Designated Civil Judge, who has commented as follows:

"The order of 15 March 2023 was not made at a hearing. Rather, the order disposed of an application on paper, in accordance with Civil Procedure Rule 23.9. Paragraph 25 of the order sets out the steps that need to be taken if a person wishes to apply to have the order set aside or varied. A formal application notice is required. Litigation cannot be conducted by informal email."

Best regards

Vikas Bali
Business and Property Courts Team
The Business and Property Courts in Birmingham

Tel: 0121 681 3043
BPC.Birmingham@justice.gov.uk
KB.Birmingham@justice.gov.uk

'I am not authorised to bind the Ministry of Justice contractually, nor to make representations or other statements which may bind the Ministry of Justice in any way via electronic means'

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<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>"

[Here is how HMCTS uses personal data about you](#)

[Coronavirus \(COVID-19\): courts and tribunals planning and preparation](#)

From: Mark Keir [REDACTED]
Sent: 04 April 2023 18:57
To: KB.Birmingham <KB.Birmingham@justice.gov.uk>
Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]. Attn Her Honour Judge Emma Kelly

Your Honour,

I have steadfastly and conscientiously opposed HS2's injunctions at every possible occasion. At every hearing (this will be the tenth I have attended?) HS2 have sought to avoid having defendant's in Court. It seems they are carrying on the tradition.

You presided over a Directions hearing to which no defendant was invited, and what has transpired is two weeks notice to enter submissions, evidence and questions regarding the most extensive, most expensive and definitely the most questionable project in Europe. For fully trained barristers this would be a tall order. For ordinary people who have to do all this around a normal working and family day, this is quite Impossible. (As a measure, you will note my last submission was quite substantial....I see no reason to suppose I'd like to submit something lesser, but nevertheless two weeks is not enough to gather, formulate and make ready for Court evidence from 10 years and 340 miles of misdemeanours and mis-management.) For ordinary people who have been bled dry over many years of attempting to see justice done in this case, this is insulting. Anybody would think someone wanted to evade proper scrutiny.

Please can you amend the ruling and delay the hearing by at least a month (after all Jce Julian Knowles Order was handed down in September) and give us at *least* a month more to submit our statements and evidence.

I look forward to hearing very soon

Yours sincerely

Mark Keir

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY
HER HONOUR JUDGE EMMA KELLY

QB-2022-BHM-000044

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, SUBCONTRACTORS, 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

DIRECTIONS ORDER.

I am Mark Keir of Jones' Hill Wood, [REDACTED]

CORE-C-8

I am Defendant 36 in these proceedings.

I enter this request as a legal "ingenu" not in any way able to afford legal help in this matter.

I have diligently and honestly defended against HS2 Ltd's increasing injunctions from the very start....I think now I have filed submissions and spoken at ten hearings in this matter.

In the last hearing, presided over by Jce Julian Knowles, HS2 Ltd noted that my submission was substantial. I see no reason to assume any submission from me at this hearing would be anything but substantial. A case that requires the exploration of the most extensive, most expensive and the most questionable construction project in Europe and requires collection, collation and presentation of evidence from over 10 years and over 300 miles of very fertile ground cannot be treated with any hope of justice when the defendants have been excluded from Directions process, are only given only two weeks in which to create presentable and safe submissions when all such work has to be fitted around normal working and family life, and when the Claimants have been busy preparing for several months.

The Order from Jce Knowles was handed down in September, not in May.

An annual review should surely take September as it's start date as we had no idea there would be an annual review requirement prior to that date.

I have not been served any documentation to the Review hearing, but was only given an inkling through the Directions hearing that there was a new website....which when I tried opening I was met with a "Not Available" message until considerably later than service of the Directions.

There are at least two new Defendants named in these proceedings, neither of whom were served the Directions but only some time later served with Review material, and who thus had less time than I.

It is thus, that I respectfully request to have the Directions order be varied such that Natural Justice be seen to be done. I request the Review Hearing be delayed by at least 6 weeks and the deadline for submissions be extended by eight weeks.

I make the preceding request in honesty and sincerity.

I rest my Case

A handwritten signature in blue ink, appearing to read 'A. A. C.', is written in a cursive style.

5th April 2023

Mary Barraclough

From: HS2Injunction
Sent: 06 April 2023 20:22
To: Mark Keir; HS2Injunction
Subject: FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Item shared with you: "Request to Vary.pdf" [DLAP-UKMATTERS.FID6569426]
Attachments: Request to Vary.pdf

Dear Mr Keir

Please see our email below timed at 19:01 today which we are re-sending to you due to having received a bounce-back.

We have removed the attachment which made the email exceed your email server's size limit (being the Judgment of Knowles J) and have instead inserted a link to that attachment within the body of the email below.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 06 April 2023 19:01
To: Mark Keir [REDACTED]; HS2Injunction <HS2Injunction@dlapiper.com>
Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Item shared with you: "Request to Vary.pdf" [DLAP-UKMATTERS.FID6569426]

Dear Mr Keir

We refer to your submission of yesterday titled 'Request to Vary' (as attached), which we note was copied to the Court and to D6 (James Knaggs) and D66 (Caroline Thomson-Smith).

We note your suggestion that your submissions for the Review Hearing on 16 May 2023 will be substantial, like your submissions before Knowles J in May 2022 (which ran to circa 3000 pages), primarily on the basis of your view that the case requires evidence from over 10 years to be presented to the Court. In this regard we would refer you specifically to the following paragraphs of the Judgment of Knowles J ("**Judgment**") (a copy of which is available for reference [here](#)):

- Paragraphs 14 to 26 which address the fact that HS2 is the culmination of a democratic process and being built under specific powers granted by Parliament. The scheme was preceded by extensive consultation and detailed consideration in Parliament. In particular, we would refer you to paragraph 21 where Knowles J explicitly acknowledged yet disagreed with your submissions in this regard.
- Paragraph 70 where Knowles J reiterated in relation to your submissions that he was 'not concerned with the merits of HS2. Parliament has decided that question'.

- Paragraph 160 where Knowles J set out that 'the HS2 scheme is specifically authorised by the HS2 Acts...Parliament decided that the project was in the public interest'.
- Paragraph 183(a) where it is again highlighted by Knowles J that Parliament approved HS2.

The abovementioned paragraphs of the Judgment clearly demonstrate that the Judge has already made a finding that the HS2 Scheme has been authorised by Parliament, and that the Court is not therefore concerned with the rights or wrongs of the HS2 Scheme. Whilst the evidence filed by you in May 2022 was considered by Knowles J prior to him handing down the Judgment, his Judgment makes clear that any material relating to the merits of the HS2 Scheme is irrelevant to the issues which the Court is tasked with considering in relation to the Injunction Order.

At the Review Hearing, the Court will be considering the Injunction Order, and primarily whether to continue and/or extend and/or vary it. The Court will once again not be considering the merits of the HS2 Scheme. In line with paragraph 12 of the Directions Order, any statement of case and evidence upon which you seek to rely at the Review Hearing with a view to seeking to amend (including discharge) the Injunction Order or opposing the applications made by the Claimants should therefore seek to address those issues rather than the HS2 Scheme generally.

In relation to your comments that the Injunction Order of Knowles J was handed down in September not May; that the annual review should therefore take place in September; and that you had no idea there would be an annual review requirement prior to that date, the Injunction Order [here](#) clearly states at paragraph 15 that the Order will be reconsidered at a hearing to be listed on approximately a yearly basis between 15 and 31 May. You have therefore been on notice that the Review Hearing would be listed during that window since the Injunction Order was made on 20 September 2022.

As advised in our email to you timed at 17:37 on 31 March 2023 (and our earlier email of 27 March 2023 timed at 14:56), all documents relevant to the Review Hearing have been served on you (and all other currently Named Defendants) in accordance with the Directions Order, that is, by the Claimants uploading the same to: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings> .

In terms of the length of time afforded to you (and other Named Defendants) for filing and serving any evidence upon which you seek to rely in opposition to the applications made by the Claimants (the deadline for which being 4 pm on 11 April 2023), that deadline has been decided by the Court (not by the Claimants) as per paragraph 12 of the Directions Order which was served on you by email timed at 21:38 on 16 March 2023.

As the Court highlighted in its email to you timed at 14:48 yesterday, paragraph 25 of the Directions Order sets out the steps that need to be taken if a person wishes to apply to have the Directions Order set aside or varied. A formal application notice is required, but in any event, any such application needed to have been made within 7 days after the date on which the Directions Order was served on you (so by no later than 23 March 2023).

It is not within the Claimants' gift to grant you an additional period of time within which to prepare and file any submissions you wish to make in response to the Claimants' application.

Yours faithfully

DLA Piper UK LLP

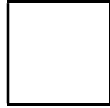
From: Mark Keir (via Google Drive) [REDACTED]
Sent: 05 April 2023 17:42
To: HS2Injunction <HS2Injunction@dlapiper.com>
Cc: gb.birmingham@justice.gov.uk; [REDACTED]
Subject: Item shared with you: "Request to Vary.pdf"

****EXTERNAL****

Mark Keir shared an item



Mark Keir ([REDACTED]) has shared the following item:



Please find attached re Directions Order to QB-2022-BHM-000044

Request to Vary.pdf



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Mary Barraclough

From: HS2Injunction
Sent: 06 April 2023 20:32
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Item shared with you: "Request to Vary.pdf" [DLAP-UKMATTERS.FID6569426]
Attachments: ~WRD0000.jpg
Follow Up Flag: Follow up
Flag Status: Completed

From: Mark Keir
Sent: Thursday, April 6, 2023 8:29:40 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: HS2Injunction
Subject: Re: FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Item shared with you: "Request to Vary.pdf" [DLAP-UKMATTERS.FID6569426]

****EXTERNAL****

Perhaps you should read my submission. It was not on the merits or otherwise of HS2 but on the legalities.

On Thu, 6 Apr 2023, 20:22 HS2Injunction, <HS2Injunction@dlapiper.com> wrote:

Dear Mr Keir

Please see our email below timed at 19:01 today which we are re-sending to you due to having received a bounce-back.

We have removed the attachment which made the email exceed your email server's size limit (being the Judgment of Knowles J) and have instead inserted a link to that attachment within the body of the email below.

Yours faithfully

DLA Piper UK LLP

Mary Barraclough

From: HS2Injunction
Sent: 07 April 2023 07:28
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: Item shared with you: 'Request to Vary.pdf'
Attachments: N244.pdf; N244_Notes_0722.pdf

From: Bali, VikasOn Behalf OfKB.Birmingham
Sent: Thursday, April 6, 2023 1:40:05 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: Mark Keir
Cc: [REDACTED] HS2Injunction
Subject: RE: Item shared with you: 'Request to Vary.pdf'

****EXTERNAL****

Dear Sir

In response to your letter: [Request to Vary.pdf - Google Drive](#)

I refer you to my email response sent yesterday:

“ Your email below has been referred to Her Honour Judge Emma Kelly, the Designated Civil Judge, who has commented as follows:

"The order of 15 March 2023 was not made at a hearing. Rather, the order disposed of an application on paper, in accordance with Civil Procedure Rule 23.9. Paragraph 25 of the order sets out the steps that need to be taken if a person wishes to apply to have the order set aside or varied. A formal application notice is required. Litigation cannot be conducted by informal email."

You will need to make an application on Form N244 (attached) and either pay a Court fee of £108 or apply for Fee exemption (Form EX160- available online)

Best regards

Vikas Bali
Business and Property Courts Team
The Business and Property Courts in Birmingham

Tel: 0121 681 3043
BPC.Birmingham@justice.gov.uk
KB.Birmingham@justice.gov.uk

'I am not authorised to bind the Ministry of Justice contractually, nor to make representations or other statements which may bind the Ministry of Justice in any way via electronic means'

'For information on how HMCTS uses personal data about you please see:
<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

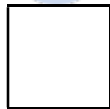
[Coronavirus \(COVID-19\): courts and tribunals planning and preparation](#)

From: Mark Keir (via Google Drive) [REDACTED]
Sent: 05 April 2023 17:42
To: KB.Birmingham <KB.Birmingham@justice.gov.uk>
Cc: [REDACTED]; hs2injunction@dlapiper.com
Subject: Item shared with you: 'Request to Vary.pdf'

Mark Keir shared an item

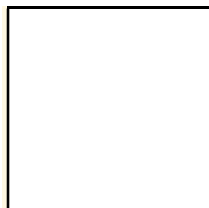


Mark Keir ([REDACTED]) has shared the following item:



Please find attached re Directions Order to QB-2022-BHM-000044

Request to Vary.pdf



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QB-2022-BHM-00044
High Speed Two (HS2)Ltd & Secretary of State for Transport
V
Persons unknown and Ors
Review Hearing 16th May 2023

Notice of intention to call witnesses
By
Mark Keir Defendant No.36

I hereby give notice I intend calling Robert Jordan to cross examination.

Using evidence already submitted to Court I will demonstrate the fallibility of his evidence, through uncovering at times lurid fabrications, and through this will demonstrate that other statements that depend on his witness therefore must also be deemed unsafe and hence this injunction too. I will demonstrate too, the likelihood that Mr Jordan et al are guilty of harassment through this injunction, and that Mr Jordan's fabrications have been used by the Claimants to fraudulently acquire land, to further harass and intimidate Defendants.

I hereby give notice that I intend to call the First Claimant, the Right Honourable Mark Harper MP and Secretary of State for Department of Transport to cross examination:

Using evidence already supplied to Court and Hansard and ors, I will question the First Claimant on information regarding costs, benefits and viability of HS2 supplied to Parliament prior to Enactments of HS2 Phase 1 and Phase 2a and demonstrate that Parliament was misled by his Office and that therefore Enactments were as a result of fraud. HS2 must therefore be considered legally unsafe and not an appropriate subject of judicial protection through Courts of Justice.

Also:

Using evidence already supplied to Court and evidence used in R (oao Mark Keir) v NE - C1-2021-0788 and Reports from The Wildlife and Woodland Trusts, I will demonstrate that the Environmental Statement as submitted to Parliament is far from being the complete and error free account the First Claimant assured Parliament it was. I will thus demonstrate:

1. That Parliament was misled as to the soundness of HS2 and Enactment was therefore due to fraud.
2. That deemed planning permission falls and that therefore:
3. All operations are without planning permission and are illegal on that basis

But also:

4. That all operations will likely, and that many demonstrably do, exceed the legally binding damage limitations set within that Statement.
5. That all the above removes any legal basis of HS2.
6. That an injunction to protect “lawful” work is inappropriate.
7. That rather than hinder and obstruct the public scrutiny of HS2, the Court should encourage us all to go out and observe and record criminal and unlawful activity of HS2 Ltd in all its guises.

Also:

Using evidence already supplied to Court I will question the First Claimant as to the legally required adherence of the HS2 Acts to the Climate Change Act 2008. I believe I can very easily demonstrate that said adherence is impossible, ergo Enactments of HS2 Phase 1 and Phase 2a were illegal, ergo HS2 operations are not a fit subject for Judicial protection of “lawful” work.



11th April 2023

QB-2022-BHM-00044
High Speed Two (HS2)Ltd & Secretary of State for Transport
V
Persons unknown and Ors
Review Hearing 16th May 2023

Grounds for Defence
Of
Mark Keir Defendant No.36

1. I am Mark Keir, of Jones' Hill Wood, [REDACTED]
2. I am an unashamed peaceful and diligent campaigner against HS2 (mainly), and have been for many years.
3. I believe all the following Statement to be factually correct and honest to the very best of my knowledge.
4. This statement is incomplete and haphazard and will likely be added to in the coming days and weeks right up to the Hearing. It is necessarily thus owing to ridiculous Directions that were passed without any input from Defendants, with less than two weeks to collect and prepare evidence.
5. I would add also that Jsce Julian Knowles required an annual review of the injunction in his Order of September 2022. Is there a note of panic bringing it so far forward?

6. The Claimants seek to add a new category of Persons Unknown. It is both vague and contorted. It is extremely difficult to ascertain exactly what this category intends to capture, which in itself makes it inappropriate to an injunction.
7. The new category however seems to aim at all protest, all campaigning of any sort against HS2. I do believe Lord Berkeley, Bob Pragada (<https://www.telegraph.co.uk/business/2023/04/08/hs2-rethink-boss-largest-contractors/>) fall prey to this category. Even the 1st Claimant himself seems in grave danger after announcing costly delays.

8. At time of writing this statement the Claimants video evidence is unavailable.

9. I believe there is ample evidence before the Court that this injunction represents pure and simple harassment of the Defendants and is a clear attempt to disembowel democracy and legitimate dissent. As an example, I ask you to consider my place in these proceedings.
10. I have been a named Defendant since the very first inception of the Claimants attempts to gag dissent way back in 2018 with the first injunction proceedings at

Harvil Rd. I have yet to see production of any evidence of unlawful behaviour on my part. Indeed, it would appear that the main reason given for this is for my paraphrasing of Miranda in *The Tempest*. Protest is a demonstration of anger. My demonstration of anger has always been demonstrably peaceful and well informed. To drag me through now ten (is it more? - I've lost count!) Hearings such as this can only be viewed as harassment and a bitter attempt to stifle dissent and the telling of truth.

11. I can also demonstrate that harassment through email communications with the Claimants and their legal team.
12. I believe Service to the first route-wide Hearing, treatment of Defendants there and also at the last Hearing, at the behest of the Claimants further testifies to ongoing harassment.
13. HS2 security patrolled both those Hearings.
14. HS2 security patrolled the Spring Conference of the Green Party of England and Wales.
15. Similar spitefulness is also clear to be seen at felling of Euston Sq trees.
16. I firmly believe, and can demonstrate that much evidence put before the Court by Mr Jordan is fictitious and is truly part of that harassment, and indeed intimidation. I have demonstrated this as I believe others have too in submissions to earlier Hearings. I would relish the chance to cross examine Justice Knowles in particular on his judgement in September over this issue!
17. I believe the insidious attempt to even gag dissent with such brutally difficult Directions as given here is also tantamount to harassment (and also a breach of Natural Justice).
18. I find it truly worrying and depressing that a "temporary" injunction is in effect extended over 5 years, ever expanding in physical and temporal scope, and ever expanding in its reach to catch *all* dissent. This clearly alludes further to intimidation and harassment, and that it is sanctioned by Court.

19. This injunction is in place at the behest of the Claimants who seem even freer to operate criminally in the absence of protest and oversight. I offer as evidence the felling in Sheephouse Wood, now thankfully halted by Buckinghamshire Council. Please see **Exhibit 1**
20. HS2 operators felling an ancient woodland and SSSI outwith the Limit of Land to be Acquired or Used (LLAU) of the Act is a breach of that Act, a breach of the Environmental Statement (ES) Environmental Minimum Requirements (EMRs), and a wildlife crime. Should it be so, as the Claimants state, that the work was carried out with permission from Natural England, then Natural England are complicit in the same crimes, or the Claimants have fraudulently obtained that permission, or as seems more likely they have attempted to deceive one Statutory Authority to another and told a porky.
21. Leading on in that vein, At **Exhibit 2** I show just some of the lands that lie outwith the LLAU but fall within the injunction as it stands. No works or operations by HS2 on these lands can be considered lawful. Any works or operations would transgress the Act, ES and EMRs. Why then are these areas injuncted? There is no lawful work that can be obstructed.

22. Further to that I question the legality of HS2 possession of Park Lodge Farm (LL0) and Ruislip Golf Club (LL0) as change of use is inherent and I believe not applied for.

23. At **Exhibit 3** I show Provision 10 of the High Speed Railway (London to West Midlands) Act 2017

24. The Bill was Enacted on the 22nd February 2017, therefore all GVDs should have been treated by 22nd February 2022. Below I will show that the Claimants' handling of land purchase is careless, confused, and unlikely to adhere to restrictions contained within the HS2 Phase 1 Act.

25. At **Exhibit 4** I show a copy of the Claimants Exhibit 120. (unable to edit as pdf, I made a google file and have lost some of formatting) I have highlighted in red all the GVDs finalised after the deadline for treating had passed. I have highlighted in dark red GVDs finalised after a year or more of that date.

26. It is clear that approximately half of all GVDs thus far have been finalised after the treating deadline. I therefore question that all GVDs could possibly have been treated in acceptable manner or in good time.

27. At **Exhibit 5** I show a list of Lands required for the construction of the railway that are yet listed as TPOs over a year beyond the treating deadline.

28. At **Exhibit 6** I show a number of lands/properties offering various other conundrums

29. I believe therefore that the Court must ensure the lawfulness of HS2 operations by demanding proof that all treating was done appropriately and in good time.

30. Beyond all the above I reiterate all previous submissions. In particular I do not believe any judge has seriously contemplated the clear evidence of unlawfulness and criminality of the Claimants.

I believe all the preceding statement and the evidence to back it up to be an honest, sincere and truthful account.

I rest my Case



11th April 2023



Press Release from Buckinghamshire Council

30 March 2023

Sheephouse Wood - Tree Preservation Order issued

Sheephouse Wood is a 141 acre (56.9 hectares) biological Site of Special Scientific Interest (SSSI) east of Charndon in Buckinghamshire. With its ancient oak trees, diverse ground flora, breeding birds and uncommon invertebrates, this ancient woodland is a cherished site of local, national and international importance for nature conservation. It is protected through the planning process.

In recent weeks Buckinghamshire Council has become aware of HS2 cutting back trees in Sheephouse Wood and made enquiries to HS2 as to why this was happening. HS2 have stated that the works are required for safety/technical reasons to protect the bat structure they have decided to construct, and the railway line when it is operational, and that they have been given permission to do this by Natural England.

Although there is no legal requirement to do so, HS2 Phase One has the objective of seeking to achieve no net loss to biodiversity for the project and this was formalised through the HS2 Act 2017 and published in their Environmental Statement in January 2016. Also their Environmental Statement makes no account for the prospect that this ancient woodland and SSSI would be touched. It is irreplaceable and would represent harm to the landscape.

Councillor Peter Martin, Deputy Cabinet Member for HS2 at Buckinghamshire Council said: "Part of the agreement we have with HS2 Limited is for 'effective collaboration'. Despite this understanding, when we asked HS2 for more information and detail about what they are doing at Sheephouse Wood, they have not satisfactorily answered our questions or engaged in any depth about their plans. We need to know more about their rationale for cutting down irreplaceable ancient trees and as they are unwilling to provide any more detail we have no choice but to serve a Tree Preservation Order (TPO) on HS2 to protect this ancient woodland."

The TPO has been served on HS2 Limited today (Thursday 30 March). It will ensure the trees cannot be touched for up to six months and will give us more time to discuss with HS2 why they believe such brutal action is warranted, identify alternative options and to mitigate the impact of their works. Preventing the loss of even just one tree in an ancient woodland is worth fighting for."

ENDS.../

Notes to Editor

About Sheephouse Wood – it is a 56.9-hectare (141-acre) biological Site of Special Scientific Interest (SSSI) east of Charndon in Buckinghamshire.

The site has ancient oak woodland with diverse ground flora, typical breeding birds and some uncommon invertebrates. Wet areas have maple and ash. The ground flora is dominated by brambles and bluebells. Invertebrates include the rare black hairstreak butterfly and ground-hopper tetrix subulata (the slender ground-hopper).

There is access by footpaths from Calvert. Some areas have notices: "No public right of way: nature conservation area".

About the bat structure - HS2 Limited is building a bespoke 850m bat mitigation structure, based on a series of arches, alongside Sheephouse Wood SSSI in Buckinghamshire, to protect Bechstein's bats from being struck by passing trains.

Contact us at communications@buckinghamshire.gov.uk during office hours. For urgent out of hours enquiries, please call [07825 430 978](tel:07825430978).

www.buckinghamshire.gov.uk



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Buckinghamshire Council, The Gateway, Gatehouse Road,
Buckinghamshire, Aylesbury, HP19 8FF, United Kingdom

CORE-C-22

Map No.	Plot Label	Questions arising
29	LL02	Outwith LLAU, why injuncted? No lawful work to obstruct. Has change of use been applied for? Do you intend handing back as a golf course? Do you know how much that will cost?
31 R1	1493	Outwith LLAU, why injuncted? No lawful work to obstruct. Has change of use been applied for? What are legal ramifications looking after 13tb most toxic site in UK? What are legal ramifications handing back 13tb most toxic site in UK?
40	914	Outwith LLAU, why injuncted? No lawful work to obstruct. Has change of use been applied for? Why do you need fields in middle of Chilterns? No blighted house, just fields.
41	391	Outwith LLAU, why injuncted? No lawful work to obstruct. Has change of use been applied for? Why do you need fields in middle of Chilterns? No blighted house, just fields.
41	1025	Outwith LLAU, why injuncted? No lawful work to obstruct. What in God's name do you need an ancient wood for? Why should we consider it safe? Your track record is woeful.
45	LL04	Outwith LLAU, why injuncted? No lawful work to obstruct. This land possessed by ill-gotten lease is it not? What legal standing does that give you?

Termination of power to acquire land

- (1) After the end of the period of 5 years beginning with the day on which this Act is passed—
 - (a) no notice to treat may be served under Part 1 of the Compulsory Purchase Act 1965, as applied by section 4(3) to the acquisition of land under section 4(1), and
 - (b) no declaration may be executed under section 4 of the Compulsory Purchase (Vesting Declarations) Act 1981, as applied by section 4(4) to the acquisition of land under section 4(1).
- (2) The Secretary of State may by order extend the period under subsection (1) in relation to any land, but may only do so—
 - (a) once, and
 - (b) by not more than 5 years.
- (3) An order under subsection (2) is subject to special parliamentary procedure (as to which, see the Statutory Orders (Special Procedure) Act 1945).
- (4) Schedule 13 contains provision about a right to require acquisition where an order is made under subsection (2).

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
A101_053_01	LAP102941		2008	14/03/2022
A101_181_01	LAP132611		2035	15/02/2023
A101_181_01	LAP132610			15/02/2023
A101_181_01	LAP132609			15/02/2023
A101_181_01	LAP132608			15/02/2023
A101_181_01	LAP132607			15/02/2023
A101_181_01	LAP132606			15/02/2023
A101_181_01	LAP130394			15/02/2023
A101_181_20_01	LAP130405			2036
A101_181_20_01	LAP130421		15/02/2023	
A101_181_20_01	LAP131877		15/02/2023	
A101_181_20_01	LAP130378		15/02/2023	
A101_181_20_01	LAP130385		15/02/2023	
A101_181_20_01	LAP131882		15/02/2023	
A101_181_20_01	LAP130407		15/02/2023	
A101_181_20_01	LAP130402		15/02/2023	
A101_181_20_01	LAP130391		15/02/2023	
A101_181_20_01	LAP131879		15/02/2023	
A101_181_20_01	LAP131881		15/02/2023	
A101_181_20_01	LAP132000		15/02/2023	
A101_181_20_01	LAP131998		15/02/2023	
A101_181_20_01	LAP130420		15/02/2023	
A101_182_01	LAP132612		2038	
A101_182_01	LAP132613			15/02/2023
A101_182_01	LAP130440			15/02/2023
A101_182_01	LAP132614			15/02/2023
A101_182_20_01	LAP133874		2030	15/02/2023
A101_182_20_01	LAP133882			15/02/2023
A101_182_20_01	LAP130428			15/02/2023
A101_182_20_01	LAP131887			15/02/2023
A101_182_20_01	LAP130530			15/02/2023
A101_182_20_01	LAP130512			15/02/2023
A101_182_20_01	LAP131886			15/02/2023
A101_182_20_01	LAP131883			15/02/2023
A101_182_20_01	LAP130448			15/02/2023
A101_182_20_01	LAP130452			15/02/2023
A101_182_20_01	LAP132615			15/02/2023
A101_183_01	LAP132622		2027	01/03/2023
A101_183_01	LAP130539			01/03/2023
A101_183_01	LAP132623			01/03/2023
A101_183_20_01	LAP130533		2028	01/03/2023
A101_183_20_01	LAP130537			01/03/2023
A101_183_20_01	LAP130531			01/03/2023
A101_183_20_01	LAP130540			01/03/2023
A101_183_20_01	LAP132620			01/03/2023
A101_183_20_01	LAP132619			01/03/2023
A101_183_20_01	LAP132618			01/03/2023
A101_183_20_01	LAP130538			01/03/2023
A101_184_20_01	LAP130589		2032	04/03/2023
A101_186_01	LAP131189		2033	08/03/2023
A101_186_01	LAP130871			08/03/2023
A101_186_01	LAP130877			08/03/2023

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
A101_186_20_01	LAP130889		2034	06/03/2023
A101_186_20_01	LAP130884			06/03/2023
A101_186_20_01	LAP131182			06/03/2023
A101_186_20_01	LAP131220			06/03/2023
A101_186_20_01	LAP131221			06/03/2023
A101_186_20_01	LAP131222			06/03/2023
A101_186_20_01	LAP130883			06/03/2023
A101_186_20_01	LAP131228			06/03/2023
A101_187_01	LAP130616		2040	08/03/2023
A101_187_01	LAP130641			08/03/2023
A101_187_01	LAP130622			08/03/2023
A101_187_01	LAP130618			08/03/2023
A101_800_01	LAP120016	SF680314	2013	10/03/2022
A101_800_01	LAP120015			10/03/2022
A102_053_01	LAP103584		2007	26/01/2022
A102_053_01	LAP103585			26/01/2022
A102_055_01	LAP103608	SF684184	2011	23/02/2022
A102_055_01	LAP120729			23/02/2022
A102_055_01	LAP102366			23/02/2022
A102_055_01	LAP118505			23/02/2022
A102_055_01	LAP103597			23/02/2022
A102_055_01	LAP103618			23/02/2022
A102_055_01	LAP103617			23/02/2022
A102_055_01	LAP103610			23/02/2022
A102_055_01	LAP103596			23/02/2022
A102_842_01	LAP126272		2050	24/02/2023
A102_842_01	LAP128368			24/02/2023
A103_053_01	LAP103657	SF684256	2010	23/02/2022
A103_055_01	LAP103661	SF675759	2003	31/01/2022
A103_055_01	LAP103663			31/01/2022
A103_055_01	LAP103664			31/01/2022
A103_057_01	LAP103670	SF684245	2004	24/01/2022
A103_802_20_01	LAP120100		2057	01/03/2023
A103_802_20_01	LAP120104			01/03/2023
A103_802_20_01	LAP127867			01/03/2023
A103_802_20_01	LAP128025			01/03/2023
A103_802_20_01	LAP120099			01/03/2023
A103_857_01	LAP128384		2046	15/03/2023
A103_857_01	LAP127876			15/03/2023
A103_857_01	LAP127883			15/03/2023
A103_857_01	LAP126693			15/03/2023
A103_857_20_01	LAP127900		2047	06/03/2023
A103_857_20_01	LAP127878			06/03/2023
A103_857_20_01	LAP127877			06/03/2023
A103_858_01	LAP126024		2044	24/02/2023
A103_858_01	LAP127913			24/02/2023
A103_858_01	LAP127916			24/02/2023
A103_858_01	LAP128966			24/02/2023

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
A103_858_20_01	LAP127920		2045	24/02/2023
A103_858_20_01	LAP127919			24/02/2023
A103_858_20_01	LAP126894			24/02/2023
A103_858_20_01	LAP127917			24/02/2023
A103_858_20_01	LAP128973			24/02/2023
A103_858_20_01	LAP128967			24/02/2023
A104_018_01	LAP103500	SF675748	2009	04/02/2022
A104_019_01	LAP120988		2015	23/05/2022
A104_019_01	LAP120989			23/05/2022
A104_019_01	LAP120987			23/05/2022
A104_019_01	LAP120986			23/05/2022
A104_019_01	LAP120990			23/05/2022
A104_019_03	LAP120847	SF686617	2018	10/01/2023
A104_019_03	LAP120844			10/01/2023
A104_019_03	LAP120846			10/01/2023
A104_019_03	LAP120849			10/01/2023
A104_019_03	LAP120853			10/01/2023
A104_019_03	LAP120994			10/01/2023
A104_019_03	LAP121007			10/01/2023
A104_019_03	LAP121023			10/01/2023
A104_019_03	LAP120842			10/01/2023
A104_846_20_01	LAP127016		2025	25/01/2023
A104_846_20_01	LAP124757			25/01/2023
A104_847_20_01	LAP124629		2023	13/01/2023
A104_848_01	LAP124641		2024	13/01/2023
A104_848_01	LAP124648			13/01/2023
A104_848_01	LAP124646			13/01/2023
A104_848_01	LAP124642			13/01/2023
A104_850_01	LAP124634		2020	12/01/2023
A104_850_01	LAP124633			12/01/2023
A104_850_01	LAP124632			12/01/2023
A104_851_01	LAP124723		2021	22/01/2023
A104_851_01	LAP124719			22/01/2023
A104_851_01	LAP124665			22/01/2023
A104_851_01	LAP124667			22/01/2023
A104_851_01	LAP124668			22/01/2023
A104_855_01	LAP125235		2041	05/03/2023
A104_855_20_01	LAP125231		2042	15/03/2023
A104_860_01	LAP127010		2065	15/03/2023
A104_860_01	LAP126181			15/03/2023
A201_031_01	LAP120830	SF680070	2012	25/02/2022
A201_031_01	LAP102266			25/02/2022
A201_032_01	LAP102275		2016	20/05/2022
A201_032_01	LAP102271			20/05/2022
A201_032_01	LAP102277			20/05/2022
A201_032_01	LAP121937			20/05/2022
A201_032_01	LAP121938			20/05/2022
A201_032_01	LAP121939			20/05/2022
A201_032_01	LAP102272			20/05/2022
A201_849_20_01	LAP125093		2031	22/02/2023

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
A201_854_01	LAP125143		2019	27/02/2023
A201_854_01	LAP125142			27/02/2023
A201_854_01	LAP125145			27/02/2023
A201_854_01	LAP125150			27/02/2023
A201_860_01	LAP125305		2029	12/03/2023
A201_860_01	LAP125300			12/03/2023
A201_860_01	LAP125307			12/03/2023
A203_816_01	LAP121269	CH719697	2017	01/07/2022
C111_164_01	LAP43889	AGL492136	159	22/08/2019
C111_164_01	LAP43883	AGL492138		22/08/2019
C111_164_01	LAP43886			22/08/2019
C111_164_02	LAP47408	AGL507731	303	03/03/2020
C111_164_02	LAP47425			03/03/2020
C111_164_02	LAP47427			03/03/2020
C111_164_03	LAP49578	AGL490874	161	22/08/2019
C111_164_04	LAP47430	AGL378571	160	23/08/2019
C111_164_04	LAP47431			23/08/2019
C111_170_01	LAP18592	AGL503529	222	20/11/2019
C111_170_01	LAP46912	BM440776		20/11/2019
C111_170_01	LAP61124	BM442001		20/11/2019
C111_170_01	LAP48975			20/11/2019
C111_170_01	LAP61123			20/11/2019
C111_170_01	LAP46957			20/11/2019
C111_170_01	LAP49907			20/11/2019
C111_170_01	LAP48954			20/11/2019
C111_170_01	LAP61125			20/11/2019
C111_170_01	LAP61126			20/11/2019
C111_170_01	LAP61127			20/11/2019
C111_170_01	LAP46930			20/11/2019
C111_176_01	LAP61202	AGL505698	297	26/02/2020
C111_176_01	LAP61201	AGL505700(L)		26/02/2020
C111_176_01	LAP47407	AGL505702(L)		26/02/2020
C111_176_01	LAP49368	AGL505705		26/02/2020
C111_176_01	LAP47415			26/02/2020
C111_176_01	LAP61435			26/02/2020
C111_176_01	LAP49933			26/02/2020
C111_176_01	LAP48973			26/02/2020
C111_176_01	LAP48974			26/02/2020
C111_176_01	LAP46920			26/02/2020
C111_176_01	LAP46951			26/02/2020
C111_176_01	LAP61195			26/02/2020
C111_176_01	LAP47414			26/02/2020
C111_176_01	LAP40998			26/02/2020

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C111_181_01	LAP64741	AGL568119	640	11/05/2022
C111_181_01	LAP64746	AGL568133		11/05/2022
C111_181_01	LAP64751	AGL568135		11/05/2022
C111_181_01	LAP64752	BM458834		11/05/2022
C111_181_01	LAP64755	BM458835		11/05/2022
C111_181_01	LAP64759	BM458836		11/05/2022
C111_181_01	LAP64761			11/05/2022
C111_181_01	LAP64762			11/05/2022
C111_181_01	LAP64763			11/05/2022
C111_181_01	LAP64771			11/05/2022
C111_181_01	LAP64781			11/05/2022
C111_181_01	LAP64787			11/05/2022
C111_181_01	LAP64790			11/05/2022
C111_181_01	LAP64812			11/05/2022
C111_181_01	LAP64814			11/05/2022
C111_181_01	LAP64797			11/05/2022
C111_181_01	LAP64820			11/05/2022
C111_181_01	LAP64822			11/05/2022
C111_181_01	LAP64823			11/05/2022
C111_181_01	LAP64690			11/05/2022
C111_181_01	LAP64697			11/05/2022
C111_181_01	LAP67357			11/05/2022
C111_181_01	LAP64830			11/05/2022
C111_181_01	LAP64831			11/05/2022
C111_181_01	LAP67819			11/05/2022
C111_181_01	LAP64722			11/05/2022
C111_181_01	LAP64743			11/05/2022
C111_181_01	LAP64795			11/05/2022
C111_181_01	LAP64758			11/05/2022
C111_181_01	LAP64766			11/05/2022
C111_184_01	LAP67061	BM449556	469	28/04/2021
C111_184_01	LAP67327	BM449557		28/04/2021
C111_184_01	LAP67322	HD600422		28/04/2021
C111_184_01	LAP67063			28/04/2021
C111_184_01	LAP67072			28/04/2021
C111_184_01	LAP67065			28/04/2021
C111_184_01	LAP67054			28/04/2021
C111_184_01	LAP67326			28/04/2021
C111_184_01	LAP67066			28/04/2021
C111_184_01	LAP67068			28/04/2021
C111_184_01	LAP67058			28/04/2021
C111_184_01	LAP67070			28/04/2021
C111_184_01	LAP67323			28/04/2021
C111_184_01	LAP67324			28/04/2021
C111_184_01	LAP67057			28/04/2021
C111_184_01	LAP67162			28/04/2021
C111_184_01	LAP67055			28/04/2021
C111_184_01	LAP67071			28/04/2021
C111_184_01	LAP67064			28/04/2021
C111_184_01	LAP67062			28/04/2021
C111_184_01	LAP67325			28/04/2021
C111_184_01	LAP67087			28/04/2021
C111_184_01	LAP67069			28/04/2021

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C111_191_01	LAP71214		917	17/05/2022
C111_191_01	LAP71414			17/05/2022
C111_191_01	LAP71727			17/05/2022
C111_191_01	LAP71728			17/05/2022
C111_191_01	LAP71211			17/05/2022
C111_191_01	LAP71726			17/05/2022
C111_191_01	LAP71212			17/05/2022
C111_191_01	LAP71221			17/05/2022
C111_191_01	LAP71218			17/05/2022
C111_191_01	LAP71215			17/05/2022
C111_191_01	LAP71725			17/05/2022
C111_191_01	LAP71236			17/05/2022
C111_191_01	LAP71732			17/05/2022
C111_193_01	LAP70188			908
C111_193_01	LAP71636		16/05/2022	
C111_193_01	LAP71210		16/05/2022	
C111_193_01	LAP71219		16/05/2022	
C111_193_01	LAP71719		16/05/2022	
C111_193_01	LAP71720		16/05/2022	
C111_193_01	LAP70191		16/05/2022	
C111_193_01	LAP71722		16/05/2022	
C111_193_01	LAP71723		16/05/2022	
C111_193_01	LAP71209		16/05/2022	
C111_193_01	LAP71635		16/05/2022	
C111_193_01	LAP71252		16/05/2022	
C111_193_01	LAP71417		16/05/2022	
C111_193_01	LAP71601		16/05/2022	
C111_193_01	LAP71721		16/05/2022	
C112_032_01	LAP48745	HD588325	140	19/07/2019
C112_032_01	LAP41676	HD588530		19/07/2019
C112_032_01	LAP48743	HD588531		19/07/2019
C112_032_01	LAP48744	HD588549 HD588586		19/07/2019
C112_032_02	LAP61778	HD591924 HD592916	295	03/03/2020
C112_032_03	LAP18540	HD595903 HD596075	409	27/08/2020

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C112_035_01	LAP64529	BM455885	573	15/01/2022
C112_035_01	LAP64818	BM455886		15/01/2022
C112_035_01	LAP64858	BM455888		15/01/2022
C112_035_01	LAP64872	HD606596		15/01/2022
C112_035_01	LAP64885	HD606597		15/01/2022
C112_035_01	LAP64889	HD606599		15/01/2022
C112_035_01	LAP64891	HD606600		15/01/2022
C112_035_01	LAP69843	HD606602		15/01/2022
C112_035_01	LAP64907	HD606603		15/01/2022
C112_035_01	LAP64909	HD606611		15/01/2022
C112_035_01	LAP64890			15/01/2022
C112_035_01	LAP69844			15/01/2022
C112_035_01	LAP69850			15/01/2022
C112_035_01	LAP69849			15/01/2022
C112_035_01	LAP70427			15/01/2022
C112_035_01	LAP71194			15/01/2022
C112_035_01	LAP69868			15/01/2022
C112_035_01	LAP70426			15/01/2022
C112_035_01	LAP69869			15/01/2022
C112_035_01	LAP69845			15/01/2022
C112_035_01	LAP64828			15/01/2022
C112_035_01	LAP64905			15/01/2022
C112_035_01	LAP69848			15/01/2022
C112_035_01	LAP69847			15/01/2022
C112_035_01	LAP64904			15/01/2022
C112_035_01	LAP69846			15/01/2022
C112_035_01	LAP61636		15/01/2022	
C112_035_01	LAP63423		15/01/2022	
C112_035_01	LAP64528		15/01/2022	
C121_028_01	LAP18472	HD588118	132	17/07/2019
C121_028_01	LAP49602	P144802		17/07/2019
C122_140_01	LAP48770	BM436826	162	05/09/2019
C122_140_01	LAP48771			05/09/2019
C122_141_01	LAP48971	BM437277	163	06/09/2019
C122_143_01	LAP48776	BM439639	249	11/12/2019
C122_143_01	LAP18528	BM439640		11/12/2019
C122_145_01	LAP48780		422	14/11/2020
C122_145_01	LAP48781			14/11/2020
C122_145_01	LAP64009			14/11/2020
C122_167_01	LAP64619	BM454041	526	13/11/2021
C122_167_01	LAP64617			13/11/2021
C122_167_01	LAP64611			13/11/2021

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C122_169_01	LAP64974	BM455192	562	06/01/2022
C122_169_01	LAP64979	BM455201		06/01/2022
C122_169_01	LAP64978			06/01/2022
C122_169_01	LAP69504			06/01/2022
C122_169_01	LAP70776			06/01/2022
C122_169_01	LAP70777			06/01/2022
C122_169_01	LAP69503			06/01/2022
C122_169_01	LAP64986			06/01/2022
C122_169_01	LAP64983			06/01/2022
C122_169_01	LAP64982			06/01/2022
C122_169_01	LAP69499			06/01/2022
C122_169_01	LAP69498			06/01/2022
C122_169_01	LAP69500			06/01/2022
C122_169_01	LAP64981			06/01/2022
C122_169_01	LAP69505			06/01/2022
C122_169_01	LAP69796			06/01/2022
C122_169_01	LAP64989			06/01/2022
C122_169_01	LAP64988			06/01/2022
C122_169_01	LAP70675			06/01/2022
C122_169_01	LAP64972			06/01/2022
C122_169_01	LAP69922			06/01/2022
C122_169_01	LAP69926			06/01/2022
C122_169_01	LAP69927			06/01/2022
C122_169_01	LAP69921			06/01/2022
C122_169_01	LAP64965			06/01/2022
C122_169_01	LAP69502			06/01/2022
C122_169_01	LAP64967			06/01/2022
C122_169_01	LAP64987			06/01/2022
C122_169_01	LAP69501			06/01/2022
C122_169_01	LAP64964			06/01/2022
C122_170_01	LAP69781	BM455229	542	06/01/2022
C122_170_01	LAP69008			06/01/2022
C122_170_01	LAP64993			06/01/2022
C122_170_01	LAP69783			06/01/2022
C211_067_01	LAP49024	BM438198	171	04/09/2019
C211_067_01	LAP49025	BM438178		04/09/2019
C211_067_01	LAP49029	BM438179		04/09/2019
C211_067_01	LAP45091	BM258494		04/09/2019
C211_067_01	LAP49014			04/09/2019
C211_067_01	LAP45063			04/09/2019
C211_067_01	LAP45070			04/09/2019
C211_067_02	LAP45111	BM436944	169	13/09/2019
C211_067_02	LAP45105	BM436945		13/09/2019
C211_067_02	LAP45104			13/09/2019
C211_067_02	LAP45099			13/09/2019
C211_067_02	LAP45102			13/09/2019
C211_067_02	LAP45093			13/09/2019
C211_067_02	LAP45097			13/09/2019
C211_067_03	LAP45122	BM440850	170	06/09/2019
C211_067_03	LAP45113	BM440851		06/09/2019
C211_067_03	LAP45085	BM440852		06/09/2019
C211_068_01	LAP60230	BM449244	420	27/11/2020
C211_068_01	LAP60229			27/11/2020

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C211_069_01	LAP61652	BM441765	305	17/04/2020
C211_069_01	LAP61651			17/04/2020
C211_074_01	LAP64563		446	03/03/2021
C211_074_01	LAP64562			03/03/2021
C211_074_01	LAP64561			03/03/2021
C211_074_01	LAP64565			03/03/2021
C211_074_01	LAP64564			03/03/2021
C211_075_01	LAP70514	BM415453	591	31/01/2022
C211_075_01	LAP70043	BM456379		31/01/2022
C211_075_01	LAP70020	BM456383		31/01/2022
C211_075_01	LAP69834	BM456384		31/01/2022
C211_075_01	LAP69832	BM456385		31/01/2022
C211_075_01	LAP69831	BM456386		31/01/2022
C211_075_01	LAP69830	BM456387		31/01/2022
C211_075_01	LAP69098	BM456389		31/01/2022
C211_075_01	LAP65125			31/01/2022
C211_075_01	LAP65124			31/01/2022
C211_075_01	LAP65123			31/01/2022
C211_075_01	LAP65116			31/01/2022
C211_075_01	LAP65111			31/01/2022
C211_075_01	LAP65103			31/01/2022
C211_075_01	LAP65101			31/01/2022
C211_075_01	LAP65099			31/01/2022
C211_075_01	LAP65090			31/01/2022
C211_075_01	LAP65072			31/01/2022
C211_075_01	LAP65069			31/01/2022
C211_075_01	LAP65054			31/01/2022
C211_075_01	LAP65049			31/01/2022
C211_075_01	LAP65102			31/01/2022
C211_075_01	LAP65083			31/01/2022
C211_075_01	LAP70622			31/01/2022
C211_075_01	LAP69833			31/01/2022
C211_075_01	LAP70042			31/01/2022
C211_075_01	LAP70576			31/01/2022
C211_075_01	LAP70041			31/01/2022
C211_075_01	LAP70699			31/01/2022
C211_075_01	LAP65104			31/01/2022
C211_109_01	LAP71392	BM460043	814	15/04/2022
C212_094_01	LAP45267	BM438956	147	02/08/2019
C212_094_01	LAP45252	BM438959		02/08/2019
C212_094_01	LAP45189	BM438960		02/08/2019
C212_094_01	LAP45263	BM438961		02/08/2019
C212_094_01	LAP45197			02/08/2019
C212_094_01	LAP45195			02/08/2019
C212_094_01	LAP45238			02/08/2019
C212_094_01	LAP45258			02/08/2019
C212_094_01	LAP48763			02/08/2019
C212_094_01	LAP45248			02/08/2019
C212_094_01	LAP45193			02/08/2019
C212_094_01	LAP45210			02/08/2019

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C212_094_02	LAP49438	BM437230	144	31/07/2019
C212_094_02	LAP45276	BM437232		31/07/2019
C212_094_02	LAP45288	BM437234		31/07/2019
C212_094_02	LAP45272			31/07/2019
C212_094_02	LAP45292			31/07/2019
C212_094_02	LAP47696			31/07/2019
C212_094_02	LAP45278			31/07/2019
C212_094_02	LAP45275			31/07/2019
C212_094_02	LAP45277			31/07/2019
C212_094_02	LAP45285			31/07/2019
C212_094_02	LAP47697			31/07/2019
C212_094_02	LAP48045			31/07/2019
C212_094_03	LAP45168	BM441708		145
C212_094_03	LAP45167	BM442030	04/08/2019	
C212_094_03	LAP49322	BM442033	04/08/2019	
C212_094_03	LAP45181	BM442035	04/08/2019	
C212_094_03	LAP45183	BM434193	04/08/2019	
C212_094_03	LAP47826	BM389833	04/08/2019	
C212_094_03	LAP45176	BM389126	04/08/2019	
C212_094_03	LAP45173	BM387114	04/08/2019	
C212_094_03	LAP49311	BM381609	04/08/2019	
C212_094_03	LAP49317	BM380812	04/08/2019	
C212_094_03	LAP49323	BM380811	04/08/2019	
C212_094_03	LAP49312	BM378691	04/08/2019	
C212_094_03	LAP49318	BM377737	04/08/2019	
C212_094_03	LAP49324	BM377416	04/08/2019	
C212_094_03	LAP49330	BM376126	04/08/2019	
C212_094_03	LAP49307	BM374358	04/08/2019	
C212_094_03	LAP49313	BM372974	04/08/2019	
C212_094_03	LAP49319	BM372971	04/08/2019	
C212_094_03	LAP49325	BM372970	04/08/2019	
C212_094_03	LAP49331	BM372968	04/08/2019	
C212_094_03	LAP49308	BM372967	04/08/2019	
C212_094_03	LAP49314	BM372049	04/08/2019	
C212_094_03	LAP49320	BM368085	04/08/2019	
C212_094_03	LAP49326	BM367280	04/08/2019	
C212_094_03	LAP49332	BM361130	04/08/2019	
C212_094_03	LAP46799	BM347273	04/08/2019	
C212_094_03	LAP45164	BM389839	04/08/2019	
C212_094_03	LAP49329	BM434396	04/08/2019	
C212_094_03	LAP46809	BM442037	04/08/2019	
C212_094_03	LAP48125	BM442038	04/08/2019	
C212_094_06	LAP45213	BM317771	216	06/11/2019
C212_094_06	LAP45216			06/11/2019
C212_094_07	LAP45227	BM443559	217	06/11/2019
C212_094_07	LAP45229			06/11/2019
C212_094_07	LAP45226			06/11/2019
C212_094_09	LAP60012	BM440791	260	08/01/2020
C212_095_01	LAP63663	BM448307	443	25/02/2021

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C212_099_01	LAP61621	BM444371	399	24/09/2020
C212_099_01	LAP61620			24/09/2020
C212_099_01	LAP61553			24/09/2020
C212_099_01	LAP61554			24/09/2020
C212_099_01	LAP61551			24/09/2020
C212_110_01	LAP65131	BM461362	788	23/05/2022
C212_110_01	LAP65240	BM461399		23/05/2022
C212_110_01	LAP65130	BM461402		23/05/2022
C212_110_01	LAP65239	BM461413		23/05/2022
C212_110_01	LAP65236	BM461419		23/05/2022
C212_110_01	LAP70599	BM461425		23/05/2022
C212_110_01	LAP65233	BM461426		23/05/2022
C212_110_01	LAP65232	BM461427		23/05/2022
C212_110_01	LAP65231	BM461429		23/05/2022
C212_110_01	LAP70600	BM461443		23/05/2022
C212_110_01	LAP65128	BM461447		23/05/2022
C212_110_01	LAP65127	BM461451		23/05/2022
C212_110_01	LAP65284			23/05/2022
C212_110_01	LAP65229			23/05/2022
C212_110_01	LAP65241			23/05/2022
C212_110_01	LAP65247			23/05/2022
C212_110_01	LAP65248			23/05/2022
C212_110_01	LAP65249			23/05/2022
C212_110_01	LAP65250			23/05/2022
C212_110_01	LAP65251			23/05/2022
C212_110_01	LAP65254			23/05/2022
C212_110_01	LAP65255			23/05/2022
C212_110_01	LAP65257			23/05/2022
C212_110_01	LAP65259			23/05/2022
C212_110_01	LAP65261			23/05/2022
C212_110_01	LAP65263			23/05/2022
C212_110_01	LAP65264		23/05/2022	
C212_110_01	LAP65265		23/05/2022	
C212_110_01	LAP65271		23/05/2022	
C212_110_01	LAP65273		23/05/2022	
C212_129_01	LAP65174	BM459915	784	15/04/2022
C212_129_01	LAP65164			15/04/2022
C212_129_01	LAP65169			15/04/2022
C212_132_01	LAP71716	BM460054	817	08/05/2022
C212_132_01	LAP71718			08/05/2022
C212_132_01	LAP71717			08/05/2022
C213_062_01	LAP45295	BM439884	207	23/10/2019
C213_062_01	LAP49173	BM439885		23/10/2019
C213_062_01	LAP45338	BM439886		23/10/2019
C213_062_01	LAP45343	BM440347		23/10/2019
C213_062_01	LAP45304			23/10/2019
C213_062_01	LAP45281			23/10/2019
C213_062_01	LAP45293			23/10/2019
C213_062_01	LAP45296			23/10/2019
C213_062_02	LAP45326	BM440085	208	24/10/2019
C213_062_02	LAP45335	BM440087		24/10/2019
C213_062_02	LAP45323			24/10/2019
C213_062_02	LAP45347			24/10/2019

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C213_069_06	LAP65326	BM460245	918	18/05/2022
C213_069_06	LAP65345	BM460258		18/05/2022
C213_069_06	LAP65365	BM460259		18/05/2022
C213_069_06	LAP65322	BM460261		18/05/2022
C213_069_06	LAP71353	BM460264		18/05/2022
C213_069_06	LAP65321	BM460265		18/05/2022
C213_069_06	LAP71354			18/05/2022
C213_069_06	LAP65300			18/05/2022
C213_069_06	LAP71201			18/05/2022
C213_069_06	LAP65378			18/05/2022
C213_069_06	LAP65339			18/05/2022
C213_069_06	LAP69342			18/05/2022
C213_069_06	LAP65372			18/05/2022
C213_069_06	LAP65370			18/05/2022
C213_069_06	LAP65368			18/05/2022
C213_069_06	LAP65366			18/05/2022
C213_069_06	LAP65301			18/05/2022
C213_069_06	LAP65302			18/05/2022
C213_069_06	LAP65312			18/05/2022
C213_069_06	LAP65313			18/05/2022
C213_069_06	LAP65317			18/05/2022
C213_069_06	LAP65318			18/05/2022
C213_069_06	LAP65323			18/05/2022
C213_069_06	LAP65325			18/05/2022
C213_069_06	LAP65330			18/05/2022
C213_069_06	LAP65333			18/05/2022
C213_069_06	LAP65344			18/05/2022
C213_069_06	LAP65347		18/05/2022	
C213_069_06	LAP65352		18/05/2022	
C213_069_06	LAP65354		18/05/2022	
C213_077_01	LAP68924	BM454514	538	18/11/2021
C213_077_01	LAP68923			18/11/2021
C221_204_01	LAP45627	BM439964	203	10/10/2019
C221_204_01	LAP45433	BM439965		10/10/2019
C221_204_01	LAP45647	BM439966		10/10/2019
C221_204_01	LAP49092	BM439969		10/10/2019
C221_204_01	LAP45656	BM440967		10/10/2019
C221_204_01	LAP45657	BM441471		10/10/2019
C221_204_01	LAP45403			10/10/2019
C221_204_01	LAP45595			10/10/2019
C221_204_02	LAP45661	BM439681	202	11/10/2019
C221_204_02	LAP49084	BM439682		11/10/2019
C221_204_02	LAP45659	BM439683 BM439826		11/10/2019

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C221_210_01	LAP65742	BM459791	853	08/05/2022
C221_210_01	LAP70563	BM459792		08/05/2022
C221_210_01	LAP65709	BM459793		08/05/2022
C221_210_01	LAP71831	BM459794		08/05/2022
C221_210_01	LAP65688	BM459795		08/05/2022
C221_210_01	LAP65717	BM459796		08/05/2022
C221_210_01	LAP65715	BM459797		08/05/2022
C221_210_01	LAP70146	BM459798		08/05/2022
C221_210_01	LAP70147	BM459799		08/05/2022
C221_210_01	LAP70560	BM459801		08/05/2022
C221_210_01	LAP70559	BM460027		08/05/2022
C221_210_01	LAP65712			08/05/2022
C221_210_01	LAP70148			08/05/2022
C221_210_01	LAP70149			08/05/2022
C221_210_01	LAP65711			08/05/2022
C221_210_01	LAP65710			08/05/2022
C221_210_01	LAP65708			08/05/2022
C221_210_01	LAP69287			08/05/2022
C221_210_01	LAP65678			08/05/2022
C221_210_01	LAP65665			08/05/2022
C221_210_01	LAP65658			08/05/2022
C221_210_01	LAP65631			08/05/2022
C221_210_01	LAP65546			08/05/2022
C221_210_01	LAP65503			08/05/2022
C221_210_01	LAP65454		08/05/2022	
C221_210_01	LAP65685		08/05/2022	
C221_210_01	LAP71829		08/05/2022	
C221_210_01	LAP65701		08/05/2022	
C221_214_30_01	LAP71151	BM457917	685	26/02/2022
C223_037_01	LAP47008	BM430998	110	31/01/2019
C223_037_01	LAP47007			31/01/2019
C223_037_01	LAP47009			31/01/2019
C223_073_01	LAP45673	BM443209	212	30/10/2019
C223_073_01	LAP45674	BM443211		30/10/2019
C223_073_01	LAP45685	BM443212		30/10/2019
C223_073_01	LAP45688	BM443214		30/10/2019
C223_073_01	LAP45687			30/10/2019
C223_073_01	LAP45689			30/10/2019
C223_073_01	LAP45662			30/10/2019
C223_073_01	LAP61146			30/10/2019
C223_073_01	LAP61145			30/10/2019
C223_073_02	LAP49135	BM439889	211	30/10/2019
C223_073_03	LAP45676	BM439881	209	01/11/2019
C223_073_03	LAP49132	BM439882		01/11/2019
C223_073_03	LAP45715			01/11/2019
C223_073_03	LAP45679			01/11/2019
C223_073_04	LAP45677	BM442480	348	25/04/2020
C223_073_04	LAP45732	BM442648		25/04/2020
C223_073_04	LAP45719			25/04/2020
C223_073_04	LAP49119			25/04/2020
C223_080_01	LAP60451	BM447083	411	14/01/2021
C223_082_01	LAP63286	BM447791	421	19/11/2020

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C223_091_01	LAP65766	BM460549	787	27/05/2022
C223_091_01	LAP49612	BM460627		27/05/2022
C223_091_01	LAP70071	BM460629		27/05/2022
C223_091_01	LAP65787	BM460631		27/05/2022
C223_091_01	LAP65788	BM460632		27/05/2022
C223_091_01	LAP65789	BM460636		27/05/2022
C223_091_01	LAP65755	BM460648		27/05/2022
C223_091_01	LAP65752	BM460649		27/05/2022
C223_091_01	LAP65750			27/05/2022
C223_091_01	LAP65748			27/05/2022
C223_091_01	LAP65747			27/05/2022
C223_091_01	LAP65746			27/05/2022
C223_091_01	LAP65741			27/05/2022
C223_091_01	LAP65740			27/05/2022
C223_091_01	LAP65734			27/05/2022
C223_091_01	LAP65733			27/05/2022
C223_091_01	LAP65730			27/05/2022
C223_091_01	LAP65739			27/05/2022
C223_091_01	LAP65738			27/05/2022
C223_091_01	LAP65749			27/05/2022
C223_091_01	LAP65737			27/05/2022
C223_091_01	LAP65736			27/05/2022
C223_091_01	LAP65784			27/05/2022
C223_091_01	LAP70077			27/05/2022
C223_091_01	LAP70076			27/05/2022
C223_091_01	LAP70075			27/05/2022
C223_091_01	LAP69207			27/05/2022
C223_091_01	LAP69206		27/05/2022	
C223_091_01	LAP65758		27/05/2022	
C223_091_01	LAP65819		27/05/2022	
C231_153 C231_153	LAP61596	BM444684	405	18/09/2020
C231_153 C231_153	LAP61602	BM444695		18/09/2020
C231_153 C231_153	LAP61603	BM444860		18/09/2020
C231_153 C231_153	LAP61597	BM444861		18/09/2020
C231_153 C231_153	LAP61598			18/09/2020
C231_153 C231_153	LAP61600			18/09/2020
C231_153	LAP61608			18/09/2020
	LAP61817			18/09/2020
	LAP61815			18/09/2020
	LAP63341			18/09/2020
	LAP63340			18/09/2020
	LAP61601			18/09/2020
	LAP61816			18/09/2020

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C231_160_01	LAP48236	BM437152	146	30/07/2019
C231_160_01	LAP45734	BM437155		30/07/2019
C231_160_01	LAP45757	BM437158		30/07/2019
C231_160_01	LAP45768	BM437159		30/07/2019
C231_160_01	LAP48226			30/07/2019
C231_160_01	LAP46805			30/07/2019
C231_160_01	LAP45767			30/07/2019
C231_160_01	LAP45801			30/07/2019
C231_160_01	LAP45834			30/07/2019
C231_160_01	LAP49421			30/07/2019
C231_160_01	LAP45833			30/07/2019
C231_160_01	LAP48742			30/07/2019
C231_160_01	LAP45770			30/07/2019
C231_160_01	LAP45740			30/07/2019
C231_160_01	LAP45738			30/07/2019
C231_160_01	LAP45752			30/07/2019
C231_160_01	LAP45733			30/07/2019
C231_160_01	LAP45741			30/07/2019
C231_160_01	LAP45813			30/07/2019
C231_160_01	LAP45751			30/07/2019
C231_160_01	LAP45763		30/07/2019	
C231_160_02	LAP45762	BM437561	164	29/08/2019
C231_160_02	LAP45764			29/08/2019
C231_160_02	LAP45761			29/08/2019
C231_168_01	LAP49482	BM447487	407	01/10/2020
C231_168_01	LAP49498			01/10/2020
C231_168_01	LAP49483			01/10/2020
C231_168_01	LAP49484			01/10/2020
C231_168_01	LAP61968			01/10/2020
C231_168_01	LAP61969			01/10/2020
C231_168_01	LAP61970			01/10/2020
C231_179_01	LAP61746	BM442298	378	26/05/2020
C231_179_01	LAP61745			26/05/2020
C231_179_01	LAP61744			26/05/2020
C231_183	LAP49494	BM443962	363	18/09/2020
C231_184_01	LAP61822	BM444678	390	18/09/2020
C231_184_01	LAP61824	BM444694		18/09/2020
C231_184_01	LAP61823			18/09/2020
C231_184_01	LAP61818			18/09/2020
C231_184_01	LAP61821			18/09/2020
C231_184_01	LAP61820			18/09/2020
C231_184_01	LAP61825			18/09/2020
C231_184_01	LAP61819			18/09/2020
C231_188 C231_188	LAP63107	BM453079	514	02/10/2021
C231_188 C231_188	LAP63106	BM453125		02/10/2021
C231_188 C231_188	LAP63105	BM453127		02/10/2021
	LAP63398			02/10/2021
	LAP63109			02/10/2021
	LAP63108		02/10/2021	
C231_190 C231_190	LAP63339	BM449215	448	03/03/2021
C231_190	LAP63338	BM449219		03/03/2021
	LAP63337			03/03/2021

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C231_193_01	LAP65886	BM462385	805	08/05/2022
C231_193_01	LAP65860	BM462389		08/05/2022
C231_193_01	LAP70609	BM462394		08/05/2022
C231_193_01	LAP70123	BM462399		08/05/2022
C231_193_01	LAP65850	BM462400		08/05/2022
C231_193_01	LAP70177	BM462401		08/05/2022
C231_193_01	LAP71653	BM462403		08/05/2022
C231_193_01	LAP71656	BM465433		08/05/2022
C231_193_01	LAP71715			08/05/2022
C231_193_01	LAP65877			08/05/2022
C231_193_01	LAP65896			08/05/2022
C231_193_01	LAP65883			08/05/2022
C231_193_01	LAP65875			08/05/2022
C231_193_01	LAP65856			08/05/2022
C231_193_01	LAP70498			08/05/2022
C231_193_01	LAP65852			08/05/2022
C231_193_01	LAP65849			08/05/2022
C231_193_01	LAP65848			08/05/2022
C231_193_01	LAP65847			08/05/2022
C231_193_01	LAP65846			08/05/2022
C231_193_01	LAP65845			08/05/2022
C231_193_01	LAP65844			08/05/2022
C231_193_01	LAP65843			08/05/2022
C231_193_01	LAP65842			08/05/2022
C231_193_01	LAP65841			08/05/2022
C231_193_01	LAP65840			08/05/2022
C231_193_01	LAP65907			08/05/2022
C231_193_01	LAP65839			08/05/2022
C231_193_01	LAP65838			08/05/2022
C231_193_01	LAP65908			08/05/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C231_194_01	LAP70345		832	27/04/2022
C231_194_01	LAP65965			27/04/2022
C231_194_01	LAP71680			27/04/2022
C231_194_01	LAP69976			27/04/2022
C231_194_01	LAP71335			27/04/2022
C231_194_01	LAP71337			27/04/2022
C231_194_01	LAP70130			27/04/2022
C231_194_01	LAP70133			27/04/2022
C231_194_01	LAP70129			27/04/2022
C231_194_01	LAP70344			27/04/2022
C231_194_01	LAP70127			27/04/2022
C231_194_01	LAP69962			27/04/2022
C231_194_01	LAP65948			27/04/2022
C231_194_01	LAP69964			27/04/2022
C231_194_01	LAP69965			27/04/2022
C231_194_01	LAP69967			27/04/2022
C231_194_01	LAP69968			27/04/2022
C231_194_01	LAP66011			27/04/2022
C231_194_01	LAP69972			27/04/2022
C231_194_01	LAP69971			27/04/2022
C231_194_01	LAP69977			27/04/2022
C231_194_01	LAP69974			27/04/2022
C231_194_01	LAP65952			27/04/2022
C231_194_01	LAP66041			27/04/2022
C231_194_01	LAP66024			27/04/2022
C231_194_01	LAP66015			27/04/2022
C231_194_01	LAP66014			27/04/2022
C231_194_01	LAP69966			27/04/2022
C231_194_01	LAP65956			27/04/2022
C231_194_01	LAP65955			27/04/2022
C231_194_20_01	LAP66037	BM365443	820	26/04/2022
C231_194_20_01	LAP71173	BM401148		26/04/2022
C231_194_20_01	LAP69217	BM460186		26/04/2022
C231_194_20_01	LAP70135	BM460227		26/04/2022
C231_194_20_01	LAP71179	BM460230		26/04/2022
C231_194_20_01	LAP71180			26/04/2022
C231_194_20_01	LAP71183			26/04/2022
C231_194_20_01	LAP70136			26/04/2022
C231_194_20_01	LAP66039			26/04/2022
C231_194_20_01	LAP66038			26/04/2022
C231_194_20_01	LAP71178			26/04/2022
C231_194_20_01	LAP70141			26/04/2022
C231_194_20_01	LAP66030			26/04/2022
C231_194_20_01	LAP66029			26/04/2022
C231_194_20_01	LAP66027			26/04/2022
C231_194_20_01	LAP71172			26/04/2022
C231_194_20_01	LAP70134			26/04/2022
C231_195_01	LAP67181	BM449584	468	10/05/2021
C231_206_01	LAP70143	BM459329	835	10/05/2022
C231_206_01	LAP66097	BM459405		10/05/2022
C231_206_01	LAP66086			10/05/2022
C231_206_01	LAP66079			10/05/2022
C231_206_06	LAP72321	BM459794	895	10/05/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C231_206_20_01	LAP66059	BM459346	833	10/05/2022
C231_206_20_01	LAP66065			10/05/2022
C231_206_20_01	LAP71185			10/05/2022
C231_206_20_01	LAP70358			10/05/2022
C231_206_20_01	LAP71184			10/05/2022
C231_206_20_01	LAP66092			10/05/2022
C231_206_20_01	LAP66074			10/05/2022
C231_206_20_01	LAP66070			10/05/2022
C231_206_20_01	LAP66067			10/05/2022
C231_206_20_01	LAP66066			10/05/2022
C241_027_01	LAP14235	BM423765	48	02/03/2018
C241_027_02	LAP14235	BM423765 BM433772 (C)	124	22/05/2019
C241_040_01	LAP46870	BM432827	116	13/03/2019
C241_040_01	LAP16131			13/03/2019
C241_040_01	LAP42927			13/03/2019
C241_040_01	LAP42929			13/03/2019
C241_040_01	LAP43034			13/03/2019
C241_040_01	LAP43685			13/03/2019
C241_040_02	LAP47089	BM440128	188	07/01/2020
C241_040_02	LAP47088			07/01/2020
C241_085_01	LAP42738	BM428755	96	21/09/2018
C241_117_30_01	LAP64035	BM452513	490	26/08/2021
C241_117_30_01	LAP64030	BM452519		26/08/2021
C241_117_30_01	LAP64031			26/08/2021
C241_117_30_01	LAP64034			26/08/2021
C241_121_01	LAP47449	BM107453	165	29/08/2019
C241_121_01	LAP47450	BM128725		29/08/2019
C241_122_01	LAP45946	BM437191	134	10/07/2019
C241_122_01	LAP45953	BM437679		10/07/2019
C241_122_01	LAP45982			10/07/2019
C241_122_01	LAP45976			10/07/2019
C241_122_01	LAP45989			10/07/2019
C241_122_01	LAP45969			10/07/2019
C241_122_01	LAP45942			10/07/2019
C241_122_01	LAP48001			10/07/2019
C241_122_01	LAP48002			10/07/2019
C241_122_01	LAP45978			10/07/2019
C241_122_02	LAP45973	BM436335	135	09/07/2019
C241_122_03	LAP45945	BM437369	136	11/07/2019
C241_122_03	LAP45943	BM437370		11/07/2019
C241_122_03	LAP45965			11/07/2019
C241_122_03	LAP45949			11/07/2019
C241_125_01	LAP63051	BM446113	423	04/12/2020
C241_125_01	LAP60184			04/12/2020
C241_125_01	LAP49566			04/12/2020
C241_126_01	LAP63178	BM281135	428	09/12/2020
C241_155_30_01	LAP70152	BM457471	643	20/02/2022
C241_155_31_01	LAP70151	BM457206	646	20/02/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C241_157_01	LAP70243	BM462255	780	08/06/2022
C241_157_01	LAP66098			08/06/2022
C241_157_01	LAP66108			08/06/2022
C241_157_01	LAP70237			08/06/2022
C241_157_01	LAP66103			08/06/2022
C241_157_01	LAP70230			08/06/2022
C241_157_01	LAP69198			08/06/2022
C241_157_01	LAP70226			08/06/2022
C241_157_01	LAP66058			08/06/2022
C241_157_01	LAP70341			08/06/2022
C241_157_01	LAP70903			08/06/2022
C241_157_01	LAP70906			08/06/2022
C241_157_01	LAP71343			08/06/2022
C241_157_01	LAP71344			08/06/2022
C241_157_01	LAP71346			08/06/2022
C241_157_01	LAP66056			08/06/2022
C241_157_01	LAP66053			08/06/2022
C241_157_01	LAP66049			08/06/2022
C241_157_01	LAP66055			08/06/2022
C241_157_01	LAP66052			08/06/2022
C241_157_01	LAP70343			08/06/2022
C241_157_01	LAP66129			08/06/2022
C241_157_01	LAP66126			08/06/2022
C241_157_01	LAP66118			08/06/2022
C241_157_01	LAP66117			08/06/2022
C241_157_01	LAP66093			08/06/2022
C241_157_01	LAP70342			08/06/2022
C241_157_01	LAP66077			08/06/2022
C241_157_01	LAP66075			08/06/2022
C241_157_01	LAP66071			08/06/2022
C241_157_20_01	LAP66087	BM459073	765	22/04/2022
C241_157_20_01	LAP71368	BM459078		22/04/2022
C241_157_20_01	LAP66107			22/04/2022
C241_157_20_01	LAP66114			22/04/2022
C241_157_20_01	LAP66120			22/04/2022
C241_157_20_01	LAP66099			22/04/2022
C241_157_20_01	LAP69197			22/04/2022
C241_157_20_01	LAP70234			22/04/2022
C241_157_20_01	LAP70241			22/04/2022
C241_157_20_01	LAP66115			22/04/2022
C241_157_20_01	LAP66083			22/04/2022
C241_157_20_01	LAP70231			22/04/2022
C241_157_20_01	LAP70244			22/04/2022
C241_157_20_01	LAP70242			22/04/2022
C241_157_20_01	LAP66089			22/04/2022
C241_157_20_01	LAP70340			22/04/2022
C241_157_20_01	LAP66095			22/04/2022
C241_157_20_01	LAP70236			22/04/2022
C241_157_20_01	LAP66134			22/04/2022
C241_157_20_01	LAP66100			22/04/2022
C241_157_20_01	LAP70245			22/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C241_157_30_01	LAP70174	BM458348	658	26/02/2022
C241_157_30_01	LAP70173			26/02/2022
C241_157_30_01	LAP70175			26/02/2022
C241_157_30_01	LAP70176			26/02/2022
C241_157_30_01	LAP70172			26/02/2022
C241_157_30_01	LAP71171			26/02/2022
C241_157_30_01	LAP70170			26/02/2022
C241_157_30_01	LAP70171			26/02/2022
C241_173_30_01	LAP70356	BM457457	647	14/02/2022
C242_101_01	LAP46012	BM438014	156	22/08/2019
C242_101_01	LAP45979	BM438015		22/08/2019
C242_101_01	LAP46011			22/08/2019
C242_101_01	LAP45998			22/08/2019
C242_101_01	LAP46003			22/08/2019
C242_101_01	LAP45975			22/08/2019
C242_101_02	LAP46016	BM437379	155	23/08/2019
C242_103_01	LAP48583	BM438316	186	25/09/2019
C242_103_01	LAP46044	ON354382		25/09/2019
C242_103_01	LAP46030	BM438317		25/09/2019
C242_103_01	LAP46037	BM438472		25/09/2019
C242_103_01	LAP46060			25/09/2019
C242_103_01	LAP46048			25/09/2019
C242_103_02	LAP46061		192	04/10/2019
C242_103_02	LAP46087			04/10/2019
C242_103_02	LAP48579			04/10/2019
C242_103_02	LAP46075			04/10/2019
C242_104_01	LAP49920		176	06/09/2019
C242_104_01	LAP49926			06/09/2019
C242_104_01	LAP49927			06/09/2019
C242_104_01	LAP46023			06/09/2019
C242_104_01	LAP46026			06/09/2019
C242_104_01	LAP49922			06/09/2019
C242_104_01	LAP48198			06/09/2019
C242_108_01	LAP61458	BM447484	402	18/09/2020
C242_108_01	LAP63181			18/09/2020
C242_109_01	LAP62827		403	24/09/2020
C242_109_01	LAP62828			24/09/2020

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C242_111_01	LAP66147	BM458009	623	25/03/2022
C242_111_01	LAP66149	BM458010		25/03/2022
C242_111_01	LAP66150	BM458018		25/03/2022
C242_111_01	LAP66151			25/03/2022
C242_111_01	LAP66152			25/03/2022
C242_111_01	LAP66155			25/03/2022
C242_111_01	LAP66160			25/03/2022
C242_111_01	LAP66162			25/03/2022
C242_111_01	LAP66163			25/03/2022
C242_111_01	LAP66164			25/03/2022
C242_111_01	LAP66165			25/03/2022
C242_111_01	LAP66167			25/03/2022
C242_111_01	LAP66168			25/03/2022
C242_111_01	LAP66153			25/03/2022
C242_111_01	LAP70338			25/03/2022
C242_111_01	LAP70339			25/03/2022
C242_111_01	LAP66169			25/03/2022
C242_111_01	LAP66173			25/03/2022
C242_111_01	LAP71206			25/03/2022
C242_111_01	LAP66156			25/03/2022
C242_111_01	LAP69188		25/03/2022	
C242_111_01	LAP66142		25/03/2022	
C242_111_01	LAP66125		25/03/2022	
C242_111_01	LAP66127		25/03/2022	
C242_111_01	LAP66128		25/03/2022	
C242_111_01	LAP66132		25/03/2022	
C242_111_01	LAP66135		25/03/2022	
C242_111_01	LAP66137		25/03/2022	
C242_111_01	LAP66139		25/03/2022	
C242_111_01	LAP66140		25/03/2022	
C242_111_20_01	LAP66123	BM456869	625	11/03/2022
C242_111_20_01	LAP66109			11/03/2022
C242_111_20_01	LAP66104			11/03/2022
C242_111_20_01	LAP70337			11/03/2022
C242_111_20_01	LAP69187			11/03/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C242_112_01	LAP66181	BM460061	774	06/05/2022
C242_112_01	LAP66179	BM460072		06/05/2022
C242_112_01	LAP70374	BM460074		06/05/2022
C242_112_01	LAP66220			06/05/2022
C242_112_01	LAP70359			06/05/2022
C242_112_01	LAP66226			06/05/2022
C242_112_01	LAP66227			06/05/2022
C242_112_01	LAP66228			06/05/2022
C242_112_01	LAP66229			06/05/2022
C242_112_01	LAP66230			06/05/2022
C242_112_01	LAP69415			06/05/2022
C242_112_01	LAP70365			06/05/2022
C242_112_01	LAP70366			06/05/2022
C242_112_01	LAP66217			06/05/2022
C242_112_01	LAP66191			06/05/2022
C242_112_01	LAP66192			06/05/2022
C242_112_01	LAP66193			06/05/2022
C242_112_01	LAP66194			06/05/2022
C242_112_01	LAP66199			06/05/2022
C242_112_01	LAP66189			06/05/2022
C242_112_01	LAP66185			06/05/2022
C242_112_01	LAP66188			06/05/2022
C242_112_01	LAP66184			06/05/2022
C242_112_01	LAP71281			06/05/2022
C242_112_01	LAP66182			06/05/2022
C242_112_01	LAP66204			06/05/2022
C242_112_01	LAP70428			06/05/2022
C242_112_01	LAP70457		06/05/2022	
C242_112_01	LAP66206		06/05/2022	
C242_112_01	LAP70443		06/05/2022	
C242_112_20_01	LAP70452	BM458488	748	11/04/2022
C242_112_20_01	LAP70449	BM458491		11/04/2022
C242_112_20_01	LAP70451	BM458493		11/04/2022
C242_112_20_01	LAP70450			11/04/2022
C242_112_20_01	LAP70453			11/04/2022
C242_112_20_01	LAP70454			11/04/2022
C242_112_20_01	LAP71589			11/04/2022
C242_112_20_01	LAP71284			11/04/2022
C242_112_20_01	LAP71290			11/04/2022
C242_112_20_01	LAP71287			11/04/2022
C242_112_20_01	LAP66203			11/04/2022
C242_112_20_01	LAP70456			11/04/2022
C242_112_20_01	LAP66207			11/04/2022
C242_112_20_01	LAP66208			11/04/2022
C242_112_20_01	LAP66211			11/04/2022
C242_112_20_01	LAP70455			11/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C242_113_01	LAP66251	BM459833	797	13/05/2022
C242_113_01	LAP66297	BM459851		13/05/2022
C242_113_01	LAP66254	ON374578		13/05/2022
C242_113_01	LAP66253	ON374987		13/05/2022
C242_113_01	LAP66265	ON374593		13/05/2022
C242_113_01	LAP66248	ON374597		13/05/2022
C242_113_01	LAP66247	ON374598		13/05/2022
C242_113_01	LAP66245			13/05/2022
C242_113_01	LAP66240			13/05/2022
C242_113_01	LAP66238			13/05/2022
C242_113_01	LAP66237			13/05/2022
C242_113_01	LAP66236			13/05/2022
C242_113_01	LAP66235			13/05/2022
C242_113_01	LAP66234			13/05/2022
C242_113_01	LAP66275			13/05/2022
C242_113_01	LAP66264			13/05/2022
C242_113_01	LAP66263			13/05/2022
C242_113_01	LAP66262			13/05/2022
C242_113_01	LAP66261			13/05/2022
C242_113_01	LAP66273			13/05/2022
C242_113_01	LAP66293			13/05/2022
C242_113_01	LAP66292			13/05/2022
C242_113_01	LAP66286			13/05/2022
C242_113_01	LAP66285			13/05/2022
C242_113_01	LAP66270			13/05/2022
C242_113_01	LAP66269			13/05/2022
C242_113_01	LAP66268			13/05/2022
C242_113_01	LAP66249			13/05/2022
C242_113_01	LAP66266			13/05/2022
C242_113_01	LAP70480			13/05/2022
C242_113_20_01	LAP71413	ON373870	763	18/05/2022
C242_114_30_01	LAP72163	BM457818	683	26/02/2022
C242_114_30_01	LAP72164			26/02/2022
C242_114_30_02	LAP72165		682	27/02/2022
C242_114_30_02	LAP72167			27/02/2022
C242_114_30_02	LAP72166			27/02/2022
C243_075_01	LAP46116	ON354246	189	07/10/2019
C243_075_01	LAP49277			07/10/2019
C243_075_01	LAP46120			07/10/2019
C243_075_01	LAP46101			07/10/2019
C243_075_01	LAP46105			07/10/2019
C243_075_01	LAP46110			07/10/2019
C243_075_01	LAP46113			07/10/2019
C243_075_01	LAP46114			07/10/2019
C243_075_01	LAP46115			07/10/2019
C243_075_01	LAP46103			07/10/2019
C243_075_01	LAP46108			07/10/2019
C243_075_01	LAP46112			07/10/2019
C243_075_01	LAP46109			07/10/2019
C243_075_01	LAP46121			07/10/2019

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C243_075_02	LAP46088	BM442920	190	03/10/2019
C243_075_02	LAP46094	BM443110		03/10/2019
C243_075_02	LAP46091			03/10/2019
C243_075_02	LAP46098			03/10/2019
C243_075_02	LAP49478			03/10/2019
C243_075_03	LAP46092	BM438378	191	04/10/2019
C243_075_03	LAP46097			04/10/2019
C243_075_04	LAP46138	ON354789	185	04/10/2019
C243_075_04	LAP46142	ON354790		04/10/2019
C243_075_04	LAP46148			04/10/2019
C243_075_04	LAP46125			04/10/2019
C243_075_04	LAP46139			04/10/2019
C243_075_04	LAP46145			04/10/2019
C243_075_04	LAP46153			04/10/2019
C243_076_02	LAP63393	ON363183	412	30/10/2020
C243_076_02	LAP60622			30/10/2020
C243_077_01	LAP61524	ON363583	433	14/01/2021
C243_077_01	LAP61523	ON363594		14/01/2021
C243_077_01	LAP61525	ON363600		14/01/2021
C243_077_01	LAP61522	ON363772		14/01/2021
C243_077_01	LAP61520			14/01/2021
C243_077_01	LAP61521			14/01/2021
C243_079_01	LAP62831	BM442921	374	06/06/2020
C243_079_01	LAP62830			06/06/2020
C243_079_01	LAP62829			06/06/2020
C243_079_01	LAP62832			06/06/2020
C243_080_30_01	LAP62852	ON367640	502	13/09/2021
C243_081_01	LAP63309	ON363577	429	09/12/2020

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C243_084_01	LAP70716	BM459545	781	07/05/2022
C243_084_01	LAP70715	BM459547		07/05/2022
C243_084_01	LAP70714	ON374151		07/05/2022
C243_084_01	LAP70713	ON374180		07/05/2022
C243_084_01	LAP70712	ON374181		07/05/2022
C243_084_01	LAP70711	ON374186		07/05/2022
C243_084_01	LAP70710	ON374188		07/05/2022
C243_084_01	LAP70709	ON374189		07/05/2022
C243_084_01	LAP70708	ON374190		07/05/2022
C243_084_01	LAP70707	ON375362		07/05/2022
C243_084_01	LAP70706			07/05/2022
C243_084_01	LAP66339			07/05/2022
C243_084_01	LAP70768			07/05/2022
C243_084_01	LAP66404			07/05/2022
C243_084_01	LAP66401			07/05/2022
C243_084_01	LAP66397			07/05/2022
C243_084_01	LAP66393			07/05/2022
C243_084_01	LAP66345			07/05/2022
C243_084_01	LAP66304			07/05/2022
C243_084_01	LAP66294			07/05/2022
C243_084_01	LAP66382			07/05/2022
C243_084_01	LAP66381			07/05/2022
C243_084_01	LAP66378			07/05/2022
C243_084_01	LAP66367			07/05/2022
C243_084_01	LAP66363			07/05/2022
C243_084_01	LAP66362			07/05/2022
C243_084_01	LAP66356			07/05/2022
C243_084_01	LAP66354		07/05/2022	
C243_084_01	LAP66353		07/05/2022	
C243_084_01	LAP66349		07/05/2022	
C243_084_20_01	LAP70771	BM459860	738	15/04/2022
C243_084_20_01	LAP66346	BM459862		15/04/2022
C243_084_20_01	LAP66351			15/04/2022
C243_084_20_01	LAP66405			15/04/2022
C243_084_20_01	LAP71412			15/04/2022
C244_068_01	LAP46179	ON353780	137	16/07/2019
C244_068_01	LAP46188	ON353781		16/07/2019
C244_068_01	LAP48533	ON355140		16/07/2019
C244_068_01	LAP46176	ON353783		16/07/2019
C244_068_01	LAP46156	ON355139		16/07/2019
C244_068_01	LAP46186	ON353779		16/07/2019
C244_068_01	LAP46193	ON359308		16/07/2019
C244_068_01	LAP46180			16/07/2019
C244_068_01	LAP46160			16/07/2019
C244_068_02	LAP46202	BM442450	138	17/07/2019
C244_068_02	LAP46203	BM442621		17/07/2019
C244_068_02	LAP46194	BM442631		17/07/2019
C244_068_02	LAP48517			17/07/2019
C244_068_02	LAP46237			17/07/2019
C244_068_02	LAP46226			17/07/2019
C244_068_30_01	LAP71193	BM4578919	673	23/02/2022
C244_068_30_01	LAP70602			23/02/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date	
C244_072_01	LAP46245	BM437186	157	21/08/2019	
C244_072_01	LAP46253	BM437188		21/08/2019	
C244_072_01	LAP46273			21/08/2019	
C244_072_01	LAP46274			21/08/2019	
C244_072_01	LAP46236			21/08/2019	
C244_072_05	LAP46268	BM446465	187	02/10/2019	
C244_075_01	LAP60039	ON356877	296	04/03/2020	
C244_075_01	LAP61359			04/03/2020	
C244_078_01	LAP62826	BM444041	379	04/06/2020	
C244_080_01	LAP66409	BM458458	745	21/04/2022	
C244_080_01	LAP70688	NN387295		21/04/2022	
C244_080_01	LAP66422			21/04/2022	
C244_080_01	LAP66423			21/04/2022	
C244_080_01	LAP70689			21/04/2022	
C244_080_01	LAP70685			21/04/2022	
C244_080_01	LAP70687			21/04/2022	
C244_080_01	LAP70686			21/04/2022	
C244_080_01	LAP66426			21/04/2022	
C244_080_01	LAP66428			21/04/2022	
C244_080_01	LAP66418			21/04/2022	
C244_080_01	LAP70905			21/04/2022	
C244_080_01	LAP66412			21/04/2022	
C244_080_01	LAP70904			21/04/2022	
C244_080_01	LAP66448			21/04/2022	
C244_080_01	LAP66411			21/04/2022	
C244_080_01	LAP70684			21/04/2022	
C244_080_20_01	LAP66416	BM458001		710	21/04/2022
C244_080_20_01	LAP66414	BM458021			21/04/2022
C244_080_20_01	LAP70678	BM458029	21/04/2022		
C244_080_20_01	LAP69124		21/04/2022		
C244_080_20_01	LAP70677		21/04/2022		
C244_080_20_01	LAP66441		21/04/2022		
C244_080_20_01	LAP66421		21/04/2022		
C244_080_20_01	LAP70679		21/04/2022		
C244_080_20_01	LAP69125		21/04/2022		
C244_080_20_01	LAP70680		21/04/2022		
C244_080_20_01	LAP70690		21/04/2022		
C244_080_20_01	LAP70691		21/04/2022		
C244_080_20_01	LAP70692		21/04/2022		
C244_080_20_01	LAP70683		21/04/2022		
C244_087_01	LAP71836	BM463567	838		20/04/2022
C311_081_30_01	LAP62906	NN385494	588	17/02/2022	
C311_081_30_02	LAP49609	NN385341	589	06/02/2022	
C311_081_30_02	LAP47394			06/02/2022	
C311_081_30_02	LAP70022			06/02/2022	
C311_081_30_02	LAP70023			06/02/2022	
C311_081_30_02	LAP62905			06/02/2022	
C311_085_01	LAP49008	NN370771	183	18/09/2019	
C311_085_01	LAP46319	NN370772		18/09/2019	
C311_085_01	LAP46320	NN371036		18/09/2019	
C311_085_01	LAP46306	NN371037		18/09/2019	

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C311_085_02	LAP46299	NN370688	181	21/09/2019
C311_085_02	LAP49397	NN370689		21/09/2019
C311_085_02	LAP46296	NN370691		21/09/2019
C311_085_02	LAP46297	NN370693		21/09/2019
C311_085_02	LAP46301			21/09/2019
C311_085_02	LAP49828			21/09/2019
C311_085_02	LAP46289			21/09/2019
C311_085_02	LAP49097			21/09/2019
C311_085_03	LAP46333	NN370570	182	20/09/2019
C311_085_03	LAP46330	NN370572		20/09/2019
C311_085_30_01	LAP71271	NN388465	706	27/02/2022
C311_085_30_01	LAP71270			27/02/2022
C311_085_30_01	LAP71272			27/02/2022
C311_085_31_01	LAP71273	NN386228	692	26/02/2022
C311_087_01	LAP63563	NN379771	438	22/01/2021
C311_087_01	LAP63467			22/01/2021
C311_087_01	LAP64002			22/01/2021
C311_087_01	LAP64047			22/01/2021
C311_087_01	LAP64050			22/01/2021
C311_087_01	LAP64049			22/01/2021
C311_087_01	LAP64046			22/01/2021
C311_087_01	LAP63559			22/01/2021
C311_087_01	LAP64004			22/01/2021
C311_087_01	LAP63570			22/01/2021
C311_087_01	LAP63569			22/01/2021
C311_087_01	LAP63561			22/01/2021
C311_087_01	LAP64048			22/01/2021
C311_087_01	LAP63560			22/01/2021
C311_087_01	LAP63562			22/01/2021
C311_087_30_01	LAP71277	NN385601	713	27/02/2022
C311_087_30_01	LAP71274	NN385611		27/02/2022
C311_087_30_01	LAP71276			27/02/2022
C311_087_30_01	LAP71275			27/02/2022
C311_091_01	LAP49395	NN379137	437	28/01/2021
C311_091_01	LAP49006			28/01/2021
C311_091_01	LAP64559			28/01/2021
C311_091_01	LAP64011			28/01/2021
C311_091_01	LAP64010			28/01/2021
C311_091_01	LAP49394			28/01/2021

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C311_096_01	LAP66482	NN387748	645	24/03/2022
C311_096_01	LAP66485	NN387755		24/03/2022
C311_096_01	LAP66486	NN387758		24/03/2022
C311_096_01	LAP66522	NN387770		24/03/2022
C311_096_01	LAP66480	NN387771		24/03/2022
C311_096_01	LAP66525	NN387775		24/03/2022
C311_096_01	LAP70010			24/03/2022
C311_096_01	LAP66527			24/03/2022
C311_096_01	LAP70009			24/03/2022
C311_096_01	LAP66469			24/03/2022
C311_096_01	LAP66484			24/03/2022
C311_096_01	LAP70734			24/03/2022
C311_096_01	LAP66523			24/03/2022
C311_096_01	LAP66487			24/03/2022
C311_096_01	LAP66464			24/03/2022
C311_096_01	LAP66474			24/03/2022
C311_096_01	LAP66481			24/03/2022
C311_096_01	LAP66491			24/03/2022
C311_096_20_01	LAP66488	NN388633		644
C311_096_20_01	LAP70733	NN388637	24/03/2022	
C311_096_20_01	LAP66511		24/03/2022	
C311_096_20_01	LAP71315		24/03/2022	
C311_096_20_01	LAP66501		24/03/2022	
C311_096_20_01	LAP66513		24/03/2022	
C311_096_20_01	LAP66515		24/03/2022	
C311_096_20_01	LAP66514		24/03/2022	
C311_096_20_01	LAP70732		24/03/2022	
C311_096_20_01	LAP70078		24/03/2022	
C311_096_20_01	LAP71170		24/03/2022	
C311_096_20_01	LAP70728		24/03/2022	
C311_096_20_01	LAP66478		24/03/2022	
C311_096_20_01	LAP66475		24/03/2022	
C311_096_20_01	LAP66473		24/03/2022	
C311_096_20_01	LAP66468		24/03/2022	
C311_096_20_01	LAP66499		24/03/2022	
C311_096_20_01	LAP66479		24/03/2022	
C311_096_20_01	LAP69108		24/03/2022	
C311_096_20_01	LAP66509		24/03/2022	
C311_096_20_01	LAP66500		24/03/2022	
C311_096_20_01	LAP66498		24/03/2022	
C311_097_30_01	LAP67487	NN386370	648	20/02/2022
C311_103_20	LAP66506		592	13/01/2022
C312_013_01	LAP15742	wq	115	06/03/2019
C312_029_01	LAP46369	NN212211	168	30/08/2019
C312_029_01	LAP46372	NN368856		30/08/2019
C312_029_01	LAP49010	NN370648		30/08/2019
C312_029_01	LAP46377	NN370649		30/08/2019
C312_029_01	LAP46379	NN370650		30/08/2019
C312_029_01	LAP46370			30/08/2019
C312_029_01	LAP46378			30/08/2019

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C312_029_02	LAP46398	NN370336	167	30/08/2019
C312_029_02	LAP46394	NN370338		30/08/2019
C312_029_02	LAP46382	NN370340		30/08/2019
C312_029_02	LAP46385			30/08/2019
C312_029_02	LAP46384			30/08/2019
C312_029_02	LAP46402			30/08/2019
C312_029_03	LAP46363	NN370233	172	30/08/2019
C312_029_03	LAP46338	NN370234		30/08/2019
C312_029_03	LAP46342	NN370235		30/08/2019
C312_029_03	LAP46346			30/08/2019
C312_029_03	LAP46367			30/08/2019
C312_029_03	LAP46360			30/08/2019
C312_029_30_01	LAP71294	NN386738	689	26/02/2022
C312_029_30_01	LAP71295	NN386741		26/02/2022
C312_029_30_01	LAP71296	NN386742		26/02/2022
C312_029_30_01	LAP71292			26/02/2022
C312_029_30_01	LAP71291			26/02/2022
C312_029_30_01	LAP71293			26/02/2022
C312_033_01	LAP66592	NN386551	679	20/03/2022
C312_033_01	LAP66591	NN386555		20/03/2022
C312_033_01	LAP66589	NN386563		20/03/2022
C312_033_01	LAP66586			20/03/2022
C312_033_01	LAP66584			20/03/2022
C312_033_01	LAP66582			20/03/2022
C312_033_01	LAP66581			20/03/2022
C312_033_01	LAP66579			20/03/2022
C312_033_01	LAP66577			20/03/2022
C312_033_01	LAP66576			20/03/2022
C312_033_01	LAP66575			20/03/2022
C312_033_01	LAP66573			20/03/2022
C312_033_01	LAP66572			20/03/2022
C312_033_01	LAP66571			20/03/2022
C312_033_01	LAP70810			20/03/2022
C312_033_01	LAP66568			20/03/2022
C312_033_01	LAP66533			20/03/2022
C312_033_01	LAP66532			20/03/2022
C312_033_01	LAP70907			20/03/2022
C312_033_01	LAP66570			20/03/2022
C312_033_01	LAP69995			20/03/2022
C312_033_01	LAP69989			20/03/2022
C312_033_01	LAP69853			20/03/2022
C312_033_01	LAP69854			20/03/2022
C312_033_01	LAP66614			20/03/2022
C312_033_01	LAP66594			20/03/2022
C312_033_01	LAP70106			20/03/2022
C312_033_01	LAP66590			20/03/2022
C312_033_01	LAP70000			20/03/2022
C312_033_01	LAP66612			20/03/2022

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C312_033_20_01	LAP70813	NN386512	680	20/03/2022
C312_033_20_01	LAP66563	NN386515		20/03/2022
C312_033_20_01	LAP66539	NN386516		20/03/2022
C312_033_20_01	LAP66554	NN386520		20/03/2022
C312_033_20_01	LAP70809	NN386840		20/03/2022
C312_033_20_01	LAP70645	NN386841		20/03/2022
C312_033_20_01	LAP69993	NN390137		20/03/2022
C312_033_20_01	LAP66547			20/03/2022
C312_033_20_01	LAP66560			20/03/2022
C312_033_20_01	LAP69991			20/03/2022
C312_033_20_01	LAP70812			20/03/2022
C312_033_20_01	LAP66543			20/03/2022
C312_033_20_01	LAP66562			20/03/2022
C312_033_20_01	LAP70811			20/03/2022
C312_033_20_01	LAP66593			20/03/2022
C312_033_20_01	LAP66559			20/03/2022
C312_033_20_01	LAP66596			20/03/2022
C312_033_20_01	LAP66556			20/03/2022
C312_033_20_01	LAP66538			20/03/2022
C312_033_20_01	LAP69990			20/03/2022
C312_033_20_01	LAP66561		20/03/2022	
C312_033_20_01	LAP66540		20/03/2022	
C312_033_20_01	LAP66597		20/03/2022	
C312_033_20_01	LAP69992		20/03/2022	
C312_033_20_01	LAP70011		20/03/2022	
C312_033_20_01	LAP69994		20/03/2022	
C313_066_01	LAP49718	NN372557	214	06/11/2019
C313_066_01	LAP49714	NN372558		06/11/2019
C313_066_01	LAP49717			06/11/2019
C313_068_01	LAP46426	NN370804 NN370943	178	11/09/2019
C313_068_02	LAP49011	NN370806	179	12/09/2019
C313_068_02	LAP46437	NN370807		12/09/2019
C313_068_02	LAP48670			12/09/2019
C313_068_02	LAP46443			12/09/2019
C313_068_02	LAP46447			12/09/2019
C313_068_02	LAP46446			12/09/2019
C313_068_02	LAP46442			12/09/2019
C313_068_02	LAP46448			12/09/2019
C313_068_02	LAP46436			12/09/2019
C313_068_02	LAP46431			12/09/2019
C313_068_02	LAP46430			12/09/2019
C313_068_03	LAP46438	NN370529	180	11/09/2019
C313_068_03	LAP46439			11/09/2019
C313_073_30_01	LAP70516	NN386373	632	14/02/2022

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C313_074_01	LAP66634	NN388462	594	22/02/2022
C313_074_01	LAP69775			22/02/2022
C313_074_01	LAP69772			22/02/2022
C313_074_01	LAP71140			22/02/2022
C313_074_01	LAP69811			22/02/2022
C313_074_01	LAP69809			22/02/2022
C313_074_01	LAP69808			22/02/2022
C313_074_01	LAP66637			22/02/2022
C313_074_01	LAP69812			22/02/2022
C313_074_01	LAP69813			22/02/2022
C313_074_01	LAP69778			22/02/2022
C313_074_01	LAP69810			22/02/2022
C313_074_01	LAP66638			22/02/2022
C313_074_01	LAP69814			22/02/2022
C313_074_01	LAP69815			22/02/2022
C313_074_01	LAP69817			22/02/2022
C313_074_01	LAP69816			22/02/2022
C313_074_20_01	LAP69801	NN388337	596	22/02/2022
C313_074_20_01	LAP69800			22/02/2022
C313_074_20_01	LAP69804			22/02/2022
C313_074_20_01	LAP66636			22/02/2022
C313_074_20_01	LAP66632			22/02/2022
C313_074_20_01	LAP71144			22/02/2022
C313_074_20_01	LAP71145			22/02/2022
C313_074_20_01	LAP71139			22/02/2022
C313_074_20_01	LAP71143			22/02/2022
C313_074_20_01	LAP69777			22/02/2022
C313_074_20_01	LAP69773			22/02/2022
C313_074_20_01	LAP71141			22/02/2022
C313_074_20_01	LAP71142			22/02/2022
C313_074_20_01	LAP69776			22/02/2022
C313_074_20_01	LAP69774			22/02/2022
C313_074_20_01	LAP69805			22/02/2022
C313_074_20_01	LAP69806			22/02/2022
C313_074_20_01	LAP69807			22/02/2022
C313_074_20_01	LAP69803			22/02/2022
C313_074_20_01	LAP69802	22/02/2022		

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C313_075_01	LAP66662		586	12/03/2022
C313_075_01	LAP66663			12/03/2022
C313_075_01	LAP66664			12/03/2022
C313_075_01	LAP66650			12/03/2022
C313_075_01	LAP66651			12/03/2022
C313_075_01	LAP66666			12/03/2022
C313_075_01	LAP66672			12/03/2022
C313_075_01	LAP66675			12/03/2022
C313_075_01	LAP69858			12/03/2022
C313_075_01	LAP69855			12/03/2022
C313_075_01	LAP69860			12/03/2022
C313_075_01	LAP66648			12/03/2022
C313_075_01	LAP66649			12/03/2022
C313_075_01	LAP66661			12/03/2022
C313_075_01	LAP69857			12/03/2022
C313_075_01	LAP69859			12/03/2022
C313_075_01	LAP69856			12/03/2022
C313_075_01	LAP66653			12/03/2022
C313_075_01	LAP66655			12/03/2022
C313_075_01	LAP66656			12/03/2022
C313_075_01	LAP66657			12/03/2022
C313_075_01	LAP66658			12/03/2022
C313_075_01	LAP66659			12/03/2022
C313_075_01	LAP66660			12/03/2022
C313_075_01	LAP66639		12/03/2022	
C313_075_01	LAP66640		12/03/2022	
C313_075_01	LAP66646		12/03/2022	
C313_075_01	LAP69861		12/03/2022	
C313_075_20_01	LAP69871	NN387948	587	12/03/2022
C313_075_20_01	LAP69870	NN388581		12/03/2022
C313_075_20_01	LAP69874			12/03/2022
C313_075_20_01	LAP69873			12/03/2022
C313_075_20_01	LAP66682			12/03/2022
C313_075_20_01	LAP66681			12/03/2022
C313_075_20_01	LAP69872			12/03/2022
C313_075_20_01	LAP66665			12/03/2022
C313_075_20_01	LAP66668			12/03/2022
C313_075_20_01	LAP66670			12/03/2022
C313_075_20_01	LAP66676			12/03/2022
C313_075_20_01	LAP66677			12/03/2022
C313_075_20_01	LAP66678			12/03/2022
C313_075_20_01	LAP66679			12/03/2022
C313_076_30_01	LAP69827	NN385527		603
C313_077_30_01	LAP70606	NN385529	630	12/02/2022
C313_077_30_01	LAP69828			12/02/2022
C313_077_30_01	LAP70605			12/02/2022
C314_037_01	LAP46486	NN374753	372	21/05/2020

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LAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C314_039_01	LAP46507	NN371457	154	08/08/2019
C314_039_01	LAP46468	NN371459		08/08/2019
C314_039_01	LAP46459	NN371461		08/08/2019
C314_039_01	LAP48519	NN371640		08/08/2019
C314_039_01	LAP48620	NN371462		08/08/2019
C314_039_01	LAP46504			08/08/2019
C314_039_01	LAP46471			08/08/2019
C314_039_01	LAP46495			08/08/2019
C314_039_01	LAP46461			08/08/2019
C314_039_02	LAP46508	NN371061	150	21/08/2019
C314_039_02	LAP46488	NN371062		21/08/2019
C314_039_02	LAP46479	NN371063		21/08/2019
C314_039_02	LAP46477	NN371066		21/08/2019
C314_039_02	LAP46484			21/08/2019
C314_039_02	LAP46480			21/08/2019
C314_039_02	LAP46478			21/08/2019
C314_039_02	LAP46492			21/08/2019
C314_039_04	LAP44269	NN370955	149	13/09/2019
C314_045_01	LAP63171	NN378767	442	28/01/2021
C314_045_01	LAP63170			28/01/2021
C314_047_01	LAP64570	NN382700	508	30/09/2021
C314_047_01	LAP68860	NN382714		30/09/2021
C314_047_01	LAP64571	NN382715		30/09/2021
C314_047_01	LAP64568	NN382733		30/09/2021
C314_047_01	LAP67176	NN382734		30/09/2021
C314_047_01	LAP68861			30/09/2021

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C314_048_01	LAP70725		607	05/03/2022
C314_048_01	LAP69935			05/03/2022
C314_048_01	LAP70718			05/03/2022
C314_048_01	LAP70717			05/03/2022
C314_048_01	LAP69422			05/03/2022
C314_048_01	LAP66697			05/03/2022
C314_048_01	LAP66705			05/03/2022
C314_048_01	LAP66723			05/03/2022
C314_048_01	LAP66737			05/03/2022
C314_048_01	LAP66739			05/03/2022
C314_048_01	LAP66742			05/03/2022
C314_048_01	LAP66716			05/03/2022
C314_048_01	LAP66748			05/03/2022
C314_048_01	LAP66756			05/03/2022
C314_048_01	LAP70120			05/03/2022
C314_048_01	LAP66758			05/03/2022
C314_048_01	LAP70721			05/03/2022
C314_048_01	LAP70724			05/03/2022
C314_048_01	LAP66733			05/03/2022
C314_048_01	LAP69423			05/03/2022
C314_048_01	LAP66685			05/03/2022
C314_048_01	LAP66714			05/03/2022
C314_048_01	LAP66755			05/03/2022
C314_048_01	LAP69936			05/03/2022
C314_048_01	LAP66680			05/03/2022
C314_048_01	LAP69930			05/03/2022
C314_048_01	LAP66684			05/03/2022
C314_048_01	LAP70722			05/03/2022
C314_048_01	LAP66761		05/03/2022	
C314_048_01	LAP70720		05/03/2022	
C314_048_20_01	LAP66703	NN386455	620	04/03/2022
C314_048_20_01	LAP69929	NN386456		04/03/2022
C314_048_20_01	LAP69928	NN386457		04/03/2022
C314_048_20_01	LAP66732			04/03/2022
C314_048_20_01	LAP66702			04/03/2022
C314_048_20_01	LAP69934			04/03/2022
C314_048_20_01	LAP66727			04/03/2022
C314_048_20_01	LAP69933			04/03/2022
C314_048_20_01	LAP69932			04/03/2022
C314_048_20_01	LAP66710			04/03/2022
C314_048_20_01	LAP66701			04/03/2022
C314_048_20_01	LAP66709			04/03/2022
C314_048_20_01	LAP66708			04/03/2022
C314_053_30_01	LAP70518	NN386782		657
C314_053_30_01	LAP70517		23/02/2022	
C315_076_01	LAP49740	NN373932	240	10/12/2019
C315_076_01	LAP49738	NN374717		10/12/2019
C315_076_01	LAP49736			10/12/2019
C315_076_01	LAP49735			10/12/2019
C315_076_01	LAP49733			10/12/2019
C315_076_01	LAP49737			10/12/2019
C315_076_01	LAP49756			10/12/2019
C315_076_01	LAP49755			10/12/2019

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C315_076_02	LAP49753	HN17584	241	11/12/2019
C315_076_02	LAP49754	NN373434		11/12/2019
C315_076_02	LAP49747	NN373435		11/12/2019
C315_076_02	LAP49734			11/12/2019
C315_076_03	LAP49752	NN373286	242	12/12/2019
C315_076_03	LAP49751	WK511645		12/12/2019
C315_076_03	LAP49745			12/12/2019
C315_078_01	LAP49987	WK510007	224	05/12/2019
C315_078_01	LAP49682	WK510016		05/12/2019
C315_078_01	LAP49684	WK510017		05/12/2019
C315_078_01	LAP49686	WK510018		05/12/2019
C315_078_01	LAP49690			05/12/2019
C315_078_01	LAP49709			05/12/2019
C315_078_01	LAP49710			05/12/2019
C315_078_01	LAP49687			05/12/2019
C315_078_01	LAP49988			05/12/2019
C315_078_01	LAP49692			05/12/2019
C315_086_01	LAP69840	NN387723	605	04/03/2022
C315_086_01	LAP69839			04/03/2022
C315_086_01	LAP69837			04/03/2022
C315_086_01	LAP69838			04/03/2022
C315_086_01	LAP66800			04/03/2022
C315_086_01	LAP66818			04/03/2022
C315_086_01	LAP66817			04/03/2022
C315_086_01	LAP66816			04/03/2022
C315_086_01	LAP66814			04/03/2022
C315_086_01	LAP66815			04/03/2022
C315_086_01	LAP66763			04/03/2022
C315_086_01	LAP66762			04/03/2022
C315_086_01	LAP66821			04/03/2022
C315_086_01	LAP66793			04/03/2022
C315_086_01	LAP66789			04/03/2022
C315_086_01	LAP66783			04/03/2022
C315_086_01	LAP66775			04/03/2022
C315_086_01	LAP69842			04/03/2022
C315_086_01	LAP69953			04/03/2022
C315_086_01	LAP66771			04/03/2022
C315_086_01	LAP66767	04/03/2022		
C315_086_01	LAP66764	04/03/2022		
C315_086_01	LAP69841	04/03/2022		
C315_086_01	LAP69954	04/03/2022		
C315_086_01	LAP66760	04/03/2022		
C315_086_20_01	LAP66806	NN386951	606	05/03/2022
C315_086_20_01	LAP69865			05/03/2022
C315_086_20_01	LAP66812			05/03/2022
C315_086_20_01	LAP70648			05/03/2022
C315_086_20_01	LAP70647			05/03/2022
C315_086_20_01	LAP69866			05/03/2022
C315_086_20_01	LAP70649			05/03/2022
C315_086_20_01	LAP66802			05/03/2022
C315_086_20_01	LAP69867			05/03/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C315_087_01	LAP66835	WK526545	793	12/04/2022
C315_087_01	LAP69768	WK526845		12/04/2022
C315_087_01	LAP69769	WK526862		12/04/2022
C315_087_01	LAP70664	WK526863		12/04/2022
C315_087_01	LAP66853			12/04/2022
C315_087_01	LAP66842			12/04/2022
C315_087_01	LAP66838			12/04/2022
C315_087_01	LAP66831			12/04/2022
C315_087_01	LAP66850			12/04/2022
C315_087_01	LAP66824			12/04/2022
C315_087_01	LAP66820			12/04/2022
C315_087_20_01	LAP70668	WK527661		809
C315_087_20_01	LAP70827		12/04/2022	
C315_087_20_01	LAP70673		12/04/2022	
C315_087_20_01	LAP66854		12/04/2022	
C315_087_20_01	LAP66851		12/04/2022	
C315_087_20_01	LAP66827		12/04/2022	
C315_087_20_01	LAP70828		12/04/2022	
C315_087_20_01	LAP66829		12/04/2022	
C315_087_20_01	LAP66830		12/04/2022	
C315_087_20_01	LAP71747		12/04/2022	
C315_087_20_01	LAP66828		12/04/2022	
C315_087_20_01	LAP66839		12/04/2022	
C315_087_20_01	LAP70663		12/04/2022	
C315_087_20_01	LAP71824		12/04/2022	
C315_095_31_01	LAP71138	NN386187	691	
C316_055_01	LAP46608	WK509854	199	14/10/2019
C316_055_01	LAP46622	WK509855		14/10/2019
C316_055_01	LAP49051	WK509856		14/10/2019
C316_055_02	LAP46602	WK510006	200	17/10/2019
C316_055_04	LAP46603	WK513076	201	18/10/2019
C316_055_04	LAP46600			18/10/2019
C316_055_04	LAP49954			18/10/2019
C316_055_04	LAP46597			18/10/2019
C316_055_04	LAP46601			18/10/2019
C316_055_04	LAP46598			18/10/2019
C316_055_30_01	LAP46608	WK525963		687
C316_058_01	LAP62935		410	30/10/2020
C316_058_01	LAP62936			30/10/2020
C316_058_30_01	LAP62935	WK525653	664	23/02/2022
C316_059_01	LAP69759	WK525111	622	14/02/2022
C316_059_01	LAP66858	WK525128		14/02/2022
C316_059_01	LAP69984	WK525223		14/02/2022
C316_059_01	LAP69983			14/02/2022
C316_059_01	LAP69982			14/02/2022
C316_059_01	LAP66897			14/02/2022
C316_059_01	LAP66893			14/02/2022
C316_059_20_01	LAP66866	WK526433		621
C316_059_20_01	LAP66863	WK526435	12/02/2022	
C316_059_20_01	LAP66855		12/02/2022	

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C316_060_30_01	LAP49987	WK525944	676	27/02/2022
C316_060_30_01	LAP49692			27/02/2022
C316_060_30_01	LAP71316			27/02/2022
C316_060_30_01	LAP49988			27/02/2022
C316_060_30_01	LAP49682			27/02/2022
C316_060_30_01	LAP49709			27/02/2022
C316_060_30_01	LAP49686			27/02/2022
C317_130_01	LAP49647	WK512371	234	28/11/2019
C317_130_01	LAP49660	WK512591		28/11/2019
C317_130_01	LAP49649			28/11/2019
C317_130_01	LAP49638			28/11/2019
C317_130_01	LAP49635			28/11/2019
C317_130_01	LAP49959			28/11/2019
C317_130_01	LAP49850			28/11/2019
C317_130_01	LAP49642			28/11/2019
C317_130_01	LAP49640			28/11/2019
C317_130_01	LAP49639			28/11/2019
C317_130_02	LAP49653	WK516822	232	29/11/2019
C317_130_02	LAP49664	WK516823		29/11/2019
C317_130_02	LAP49666			29/11/2019
C317_130_02	LAP49644			29/11/2019
C317_130_02	LAP49861			29/11/2019
C317_130_03	LAP49651	WK510845 WK510846	231	29/11/2019
C317_130_30_01	LAP70730	WK526003	686	26/02/2022
C317_130_30_01	LAP70729			26/02/2022
C317_130_31_01	LAP49644	WK526268	674	23/02/2022
C317_130_32_01	LAP49861	WK525771	675	25/02/2022
C317_130_32_01	LAP49664			25/02/2022
C317_130_33_01	LAP70731	WK527331	688	02/03/2022
C317_132_01	LAP46695	WK510908	238	05/12/2019
C317_132_01	LAP46706	WK510909		05/12/2019
C317_132_01	LAP46705			05/12/2019
C317_132_01	LAP46687			05/12/2019
C317_132_01	LAP46712			05/12/2019
C317_132_02	LAP49787	WK513636	239	05/12/2019
C317_132_02	LAP46682	WK513637		05/12/2019
C317_132_02	LAP46684	WK513638		05/12/2019
C317_132_02	LAP46708			05/12/2019
C317_132_30_01	LAP46687	WK524694	631	13/02/2022
C317_132_31_01	LAP71167	WK526891	678	02/03/2022
C317_132_31_01	LAP71168	WK526896		02/03/2022
C317_132_31_01	LAP71317	WK529017		02/03/2022
C317_132_31_01	LAP71318			02/03/2022
C317_135_01	LAP49670	WK336472	299	31/03/2020
C317_135_01	LAP49669	WK358261		31/03/2020
C317_136_01	LAP60060	WK512326	290	31/03/2020
C317_136_01	LAP49672			31/03/2020
C317_136_30_01	LAP49672	WK525948	677	23/02/2022
C317_136_30_01	LAP60060			23/02/2022
C317_137_01	LAP49674	N/A	158	22/08/2019
C317_138_01	LAP49656	WK513235	289	31/03/2020
C317_138_30_01	LAP49656	WK529385	684	28/02/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C317_139_01	LAP61560	WK512323	288	31/03/2020
C317_139_01	LAP49961			31/03/2020
C317_140_01	LAP61018	WK518398	432	16/12/2020
C317_144_01	LAP66963	WK530588	583	07/02/2022
C317_144_01	LAP70701	WK530591		07/02/2022
C317_144_01	LAP70064	WK530594		07/02/2022
C317_144_01	LAP69518	WK530595		07/02/2022
C317_144_01	LAP66961	WK530600		07/02/2022
C317_144_01	LAP70702			07/02/2022
C317_144_01	LAP66976			07/02/2022
C317_144_01	LAP66980			07/02/2022
C317_144_01	LAP69516			07/02/2022
C317_144_01	LAP66950			07/02/2022
C317_144_01	LAP69517			07/02/2022
C317_144_01	LAP70704			07/02/2022
C317_144_01	LAP69542			07/02/2022
C317_144_01	LAP69543			07/02/2022
C317_144_01	LAP70065			07/02/2022
C317_144_01	LAP70054			07/02/2022
C317_144_01	LAP70051			07/02/2022
C317_144_01	LAP70705			07/02/2022
C317_144_01	LAP70052			07/02/2022
C317_144_01	LAP70067			07/02/2022
C317_144_01	LAP70060			07/02/2022
C317_144_01	LAP66959			07/02/2022
C317_144_01	LAP66920			07/02/2022
C317_144_01	LAP66921			07/02/2022
C317_144_01	LAP70703			07/02/2022
C317_144_01	LAP66923			07/02/2022
C317_144_01	LAP66930			07/02/2022
C317_144_01	LAP66932			07/02/2022
C317_144_01	LAP66938			07/02/2022
C317_144_01	LAP70059			07/02/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
C317_144_20_01	LAP70058	WK524670	590	05/02/2022
C317_144_20_01	LAP70055			05/02/2022
C317_144_20_01	LAP66949			05/02/2022
C317_144_20_01	LAP70056			05/02/2022
C317_144_20_01	LAP70061			05/02/2022
C317_144_20_01	LAP66945			05/02/2022
C317_144_20_01	LAP69557			05/02/2022
C317_144_20_01	LAP66925			05/02/2022
C317_144_20_01	LAP66967			05/02/2022
C317_144_20_01	LAP66951			05/02/2022
C317_144_20_01	LAP70458			05/02/2022
C317_144_20_01	LAP66946			05/02/2022
C317_144_20_01	LAP70062			05/02/2022
C317_144_20_01	LAP66940			05/02/2022
C317_144_20_01	LAP66939			05/02/2022
C317_144_20_01	LAP66936			05/02/2022
C317_144_20_01	LAP66935			05/02/2022
C317_144_20_01	LAP66934			05/02/2022
C317_144_20_01	LAP66924			05/02/2022
C317_144_20_01	LAP66928			05/02/2022
C317_144_20_01	LAP66929			05/02/2022
C317_144_20_01	LAP69541			05/02/2022
C317_144_20_01	LAP66922			05/02/2022
C317_144_20_01	LAP70107			05/02/2022
C317_144_20_01	LAP70057			05/02/2022
C317_145_01	LAP67001	WK524753	615	12/02/2022
C317_145_01	LAP69085	WK524754		12/02/2022
C317_145_01	LAP70587	WK524757		12/02/2022
C317_145_01	LAP66994			12/02/2022
C317_145_20_01	LAP66985	WK525937	616	12/02/2022
C317_145_20_01	LAP66942	WK525953		12/02/2022
C317_145_20_01	LAP70014	WK526082		12/02/2022
C317_145_20_01	LAP69421			12/02/2022
C317_145_20_01	LAP66943			12/02/2022
C317_145_20_01	LAP66944			12/02/2022
C317_145_20_01	LAP66968			12/02/2022
C317_145_20_01	LAP66948			12/02/2022
C317_145_20_01	LAP69521			12/02/2022
N111_022_01	LAP28091	WK299681(C)	184	26/09/2019
N111_022_01	LAP28353	WK427860(C)		26/09/2019
N111_022_01	LAP28352	WK509547		26/09/2019
N111_022_01	LAP28351			26/09/2019
N111_022_01	LAP28350			26/09/2019
N111_022_01	LAP28093			26/09/2019
N111_022_01	LAP28092			26/09/2019
N111_022_31_01	LAP55720	WK526194	740	15/03/2022
N111_022_31_01	LAP55722			15/03/2022
N111_025_01	LAP28891	WK509545	197	09/10/2019
N111_025_01	LAP28890			09/10/2019
N111_025_01	LAP28892			09/10/2019
N111_027_01	LAP51240	WK520451	493	23/07/2021
N111_027_01	LAP51238	WK520503		23/07/2021

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N111_028_30_01	LAP29906	WK519228	461	04/05/2021
N111_028_30_01	LAP51971			04/05/2021
N111_028_31_01	LAP54529	WK522319	525	18/10/2021
N111_055_01	LAP54873	WK525778	782	23/03/2022
N111_055_01	LAP54871			23/03/2022
N111_056_01	LAP55222	WK529417	896	11/05/2022
N112_030_01	LAP25740	WK503162	105	04/12/2018
N112_030_30_01	LAP55528	WK526080	670	09/03/2022
N112_030_30_01	LAP54287			09/03/2022
N112_036_01	LAP26254	WK503327	104	06/12/2018
N112_036_01	LAP26255	WK503328		06/12/2018
N112_036_01	LAP26253	WK503329		06/12/2018
		WK503330		
N112_038_01	LAP27762	WK508893	153	16/08/2019
N112_038_01	LAP27761	WK509156		16/08/2019
N112_038_01	LAP27760			16/08/2019
N112_038_01	LAP28873			16/08/2019
N112_038_01	LAP28963			16/08/2019
N112_038_31_01	LAP55586	WK527689	728	07/03/2022
N112_038_31_01	LAP55587	WK527702		07/03/2022
N112_038_31_01	LAP55439			07/03/2022
N112_038_31_01	LAP55590			07/03/2022
N112_038_31_01	LAP55718			07/03/2022
N112_038_31_01	LAP55589			07/03/2022
N112_038_31_01	LAP55588			07/03/2022
N112_041_01	LAP28794	WK509659	196	04/10/2019
N112_041_01	LAP28790	WK509660		04/10/2019
N112_041_01	LAP28994			04/10/2019
N112_041_30_01	LAP54228	WK526405	756	22/03/2022
N112_041_30_01	LAP54227			22/03/2022
N112_042_01	LAP28820	WK510899	235	24/11/2019
N112_042_01	LAP28814	WK510900		24/11/2019
N112_042_01	LAP28924	WK510902		24/11/2019
N112_042_01	LAP28927	WK511150		24/11/2019
N112_042_01	LAP28926	WK511151		24/11/2019
N112_042_01	LAP28812	WK511153		24/11/2019
N112_042_01	LAP28816	WK511154		24/11/2019
N112_042_01	LAP28817			24/11/2019
N112_042_01	LAP28818			24/11/2019
N112_042_01	LAP28821			24/11/2019
N112_042_01	LAP28822			24/11/2019
N112_042_01	LAP28823			24/11/2019
N112_042_01	LAP28802			24/11/2019
N112_042_01	LAP28805			24/11/2019
N112_042_01	LAP28806			24/11/2019
N112_042_01	LAP28807			24/11/2019
N112_042_01	LAP28808			24/11/2019
N112_042_01	LAP28809			24/11/2019
N112_042_01	LAP28810			24/11/2019

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N112_042_33_01	LAP54047	WK523739	523	20/10/2021
N112_042_33_01	LAP54048	WK523788		20/10/2021
N112_042_33_01	LAP52994	WK523789		20/10/2021
N112_042_33_01	LAP52992			20/10/2021
N112_042_33_01	LAP52991			20/10/2021
N112_042_33_01	LAP52993			20/10/2021
N112_042_33_01	LAP52996			20/10/2021
N112_042_38_01	LAP55486	WK527938	846	19/04/2022
N112_042_38_01	LAP55487			19/04/2022
N112_042_38_01	LAP56060			19/04/2022
N112_042_38_01	LAP55488			19/04/2022
N112_042_38_01	LAP55489			19/04/2022
N112_042_39_01	LAP55741		712	23/03/2022
N112_043_01	LAP28836		213	07/11/2019
N112_043_01	LAP28835			07/11/2019
N112_043_01	LAP28833			07/11/2019
N112_043_30_01	LAP55768	WK527068	731	07/03/2022
N112_043_30_01	LAP55766			07/03/2022
N112_043_30_01	LAP55767			07/03/2022
N112_044_01	LAP28827	WK509476 WK509514	195	25/09/2019
N112_076_01	LAP53927	WK527342	703	02/03/2022
N112_076_01	LAP53931			02/03/2022
N112_076_01	LAP53925			02/03/2022
N112_076_01	LAP53929			02/03/2022
N112_076_01	LAP53926			02/03/2022
N112_076_01	LAP55215			02/03/2022
N112_076_01	LAP54103			02/03/2022
N112_076_01	LAP53928			02/03/2022
N112_076_20_01	LAP55375	WK525047	702	23/02/2022
N112_076_20_01	LAP55376	WK525152		23/02/2022
N112_076_20_01	LAP55374			23/02/2022
N112_081_20_01	LAP54682	WK525688	785	22/03/2022
N112_081_20_01	LAP54679	WK525689		22/03/2022
N112_081_20_01	LAP54685	WK525707		22/03/2022
N112_081_20_01	LAP54775	WK525708		22/03/2022
N112_081_20_01	LAP55501			22/03/2022
N112_081_20_01	LAP55500			22/03/2022
N112_081_20_01	LAP55499			22/03/2022
N112_081_20_01	LAP55498			22/03/2022
N112_081_20_01	LAP55497			22/03/2022
N112_081_20_01	LAP55069			22/03/2022
N112_081_20_01	LAP55091			22/03/2022
N112_081_20_01	LAP54680			22/03/2022

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N112_084_01	LAP55156	WK527808	887	03/05/2022
N112_084_01	LAP55153	WK527828		03/05/2022
N112_084_01	LAP55609	WK527831		03/05/2022
N112_084_01	LAP55049			03/05/2022
N112_084_01	LAP55047			03/05/2022
N112_084_01	LAP54971			03/05/2022
N112_084_01	LAP55152			03/05/2022
N112_084_01	LAP55887			03/05/2022
N112_084_01	LAP55046			03/05/2022
N112_084_01	LAP55610			03/05/2022
N112_084_01	LAP55531			03/05/2022
N112_084_01	LAP55147			03/05/2022
N112_084_01	LAP55148			03/05/2022
N112_084_01	LAP55150			03/05/2022
N112_084_01	LAP55050			03/05/2022
N112_084_01	LAP55154			03/05/2022
N112_084_01	LAP55151			03/05/2022
N112_084_01	LAP55279			03/05/2022
N112_086_20_01	LAP55094	WK526468	760	13/04/2022
N112_086_20_01	LAP55660	WK526480		13/04/2022
N112_086_20_01	LAP55659	WK526482		13/04/2022
N112_086_20_01	LAP55099	WK526530		13/04/2022
N112_086_20_01	LAP55095	WK526483		13/04/2022
N112_086_20_01	LAP55098	WK526618		13/04/2022
N112_086_20_01	LAP55096			13/04/2022
N112_086_20_01	LAP55097			13/04/2022
N112_086_20_01	LAP55092			13/04/2022
N112_086_20_01	LAP55093			13/04/2022
N113_002_01	LAP26295	WK460725	166	04/09/2019
N113_002_01	LAP26282	WK511055		04/09/2019
N113_002_01	LAP26326	WK511056		04/09/2019
N113_002_01	LAP28553	WK511057		04/09/2019
N113_002_01	LAP28552	WK511058		04/09/2019
N113_002_01	LAP26342	WK511238		04/09/2019
N113_002_01	LAP26339	WK511239		04/09/2019
N113_002_01	LAP26339	WK511240		04/09/2019
N113_002_30_01	LAP55450	WK525860	581	27/01/2022
N113_002_30_01	LAP55449			27/01/2022
N113_002_31_01	LAP56047	WK526146	727	07/03/2022
N113_002_31_01	LAP55575	WK526147		07/03/2022
N113_041_01	LAP27175	WK508806	141	24/07/2019
N113_041_01	LAP27181			24/07/2019
N113_041_01	LAP27169			24/07/2019
N113_041_01	LAP27176			24/07/2019
N113_041_01	LAP27170			24/07/2019
N113_041_30_01	LAP55576	WK530289	735	30/04/2022
N113_041_30_01	LAP55577			30/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N113_044_01	LAP28502	WK511060	229	25/11/2019
N113_044_01	LAP28504	WK511062		25/11/2019
N113_044_01	LAP28509	WK511262		25/11/2019
N113_044_01	LAP28494	WK511263		25/11/2019
N113_044_01	LAP28489			25/11/2019
N113_044_01	LAP28497			25/11/2019
N113_044_01	LAP28500			25/11/2019
N113_044_01	LAP28495			25/11/2019
N113_044_30_01	LAP55694	WK527617	730	11/04/2022
N113_044_30_01	LAP55695			11/04/2022
N113_044_30_01	LAP55696			11/04/2022
N113_045_01	LAP28591	WK513964	285	24/01/2020
N113_045_01	LAP28590	WK513957		24/01/2020
N113_045_01	LAP28589	WK513966		24/01/2020
N113_045_01	LAP28593	WK514007		24/01/2020
N113_045_01	LAP28594	WK514012		24/01/2020
N113_045_01	LAP28595			24/01/2020
N113_045_01	LAP28599			24/01/2020
N113_045_01	LAP29014			24/01/2020
N113_045_01	LAP29013			24/01/2020
N113_045_01	LAP28592			24/01/2020
N113_045_01	LAP28585			24/01/2020
N113_045_01	LAP28584			24/01/2020
N113_045_01	LAP28587			24/01/2020
N113_045_01	LAP29008			24/01/2020
N113_045_31_01	LAP55682	WK527648	742	15/03/2022
N113_045_31_01	LAP55680			15/03/2022
N113_045_31_01	LAP55676			15/03/2022
N113_045_31_01	LAP55674			15/03/2022
N113_045_31_01	LAP55672			15/03/2022
N113_045_31_01	LAP55673			15/03/2022
N113_045_31_01	LAP55671			15/03/2022
N113_045_31_01	LAP55669			15/03/2022
N113_045_31_01	LAP55677			15/03/2022
N113_045_31_01	LAP55678			15/03/2022
N113_045_31_01	LAP55670			15/03/2022
N113_045_31_01	LAP55679			15/03/2022
N113_045_31_01	LAP55675			15/03/2022
N113_050_01	LAP29644	WK519730	318	28/04/2020
N113_050_01	LAP29649			28/04/2020
N113_050_01	LAP29647			28/04/2020
N113_050_01	LAP29648			28/04/2020
N113_050_01	LAP29646			28/04/2020
N113_050_01	LAP29651			28/04/2020
N113_050_01	LAP29645			28/04/2020
N113_050_30_01	LAP54466	WK527198	653	22/04/2022
N113_050_30_01	LAP54467			22/04/2022
N113_050_30_01	LAP54462			22/04/2022
N113_050_30_01	LAP54465			22/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N113_070_20_01	LAP52891	WK526807	875	04/05/2022
N113_070_20_01	LAP52894	WK526811		04/05/2022
N113_070_20_01	LAP54547	WK526813		04/05/2022
N113_070_20_01	LAP53386	WK526814		04/05/2022
N113_070_20_01	LAP52890	WK526816		04/05/2022
N113_070_20_01	LAP52892			04/05/2022
N113_070_20_01	LAP52893			04/05/2022
N113_070_20_01	LAP52946			04/05/2022
N113_070_20_01	LAP54546			04/05/2022
N113_070_20_01	LAP54545			04/05/2022
N113_070_20_01	LAP54548			04/05/2022
N113_070_20_01	LAP54549			04/05/2022
N113_070_20_01	LAP54550			04/05/2022
N113_070_20_01	LAP54551			04/05/2022
N113_070_20_01	LAP54544			04/05/2022
N113_070_20_01	LAP55119			04/05/2022
N113_075 N113_075	LAP54613	WK526887	905	11/05/2022
N113_075 N113_075	LAP55088	WK526933		11/05/2022
N113_075 N113_075	LAP54605	WK526945		11/05/2022
N113_075 N113_075	LAP54606	WK526946		11/05/2022
N113_075 N113_075	LAP54612			11/05/2022
	LAP54610			11/05/2022
	LAP55090			11/05/2022
	LAP55089			11/05/2022
	LAP54602		11/05/2022	
	LAP54603		11/05/2022	
N113_078_20_01	LAP55253	WK527772	848	26/04/2022
N113_078_20_01	LAP55252	WK527773		26/04/2022
N113_078_20_01	LAP55254			26/04/2022
N113_078_20_01	LAP55865			26/04/2022
N113_078_20_01	LAP56086			26/04/2022
N113_078_20_01	LAP56085			26/04/2022
N113_078_20_01	LAP55938			26/04/2022
N113_081_20_01	LAP55893	WK528139	867	09/05/2022
N113_081_20_01	LAP55890	WK528145		09/05/2022
N113_081_20_01	LAP55891			09/05/2022
N113_081_20_01	LAP55892			09/05/2022
N113_081_20_01	LAP55888			09/05/2022
N113_084_01	LAP55889	WK527451	888	30/04/2022
N113_084_01	LAP56027			30/04/2022
N113_084_01	LAP56028			30/04/2022
N113_084_01	LAP56026			30/04/2022
N114_003_R02_01	LAP26411	WM898360	193	25/09/2019
N114_005_01	LAP22919	WK501566	83	29/05/2018
N114_037_01	LAP25035	WK501441	93	19/09/2018
N114_046_01	LAP25838	WK373159	206	24/10/2019
N114_046_31_01	LAP55664		767	18/04/2022
N114_050_01	LAP27084	WK505832	120	01/05/2019
N114_050_01	LAP27073	WK505919		01/05/2019
N114_050_01	LAP27704			01/05/2019
N114_050_32_01	LAP54471	WK525409	578	15/01/2022
N114_050_32_01	LAP54470			15/01/2022
N114_050_32_01	LAP54460			15/01/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N114_051_01	LAP27727	WK509467	152	22/08/2019
N114_051_01	LAP27724	WK509468		22/08/2019
N114_051_01	LAP27720	WK509470		22/08/2019
N114_051_01	LAP27711			22/08/2019
N114_051_01	LAP27747			22/08/2019
N114_051_30_01	LAP52498	WK525924	777	22/03/2022
N114_051_33_01	LAP55751		700	23/03/2022
N114_051_33_01	LAP55752			23/03/2022
N114_051_33_01	LAP55753			23/03/2022
N114_051_33_01	LAP55754			23/03/2022
N114_051_33_01	LAP55937			23/03/2022
N114_051_34_01	LAP56144	WK528743	864	01/05/2022
N114_052_01	LAP27089	MM128791 WM659270	127	19/06/2019
N114_059_01	LAP28964	MM150897	262	22/01/2020
N114_059_01	LAP28181	MM150954		22/01/2020
N114_059_01	LAP28182	MM151139		22/01/2020
N114_059_01	LAP28191			22/01/2020
N114_059_01	LAP28173			22/01/2020
N114_059_01	LAP28175			22/01/2020
N114_059_01	LAP28176			22/01/2020
N114_059_01	LAP28179			22/01/2020
N114_059_01	LAP28180			22/01/2020
N114_059_01	LAP28168			22/01/2020
N114_059_01	LAP28172			22/01/2020
N114_059_01	LAP28171			22/01/2020
N114_059_30_01	LAP52742	MM155513	473	13/06/2021
N114_059_30_01	LAP52741			13/06/2021
N114_059_30_01	LAP52740			13/06/2021
N114_059_34_01	LAP56021	MM174553	854	25/04/2022
N114_059_34_01	LAP55744	MM176822		25/04/2022
N114_059_34_01	LAP55919	WK528532		25/04/2022
N114_059_34_01	LAP55923			25/04/2022
N114_059_34_01	LAP55924			25/04/2022
N114_059_34_01	LAP56138			25/04/2022
N114_059_34_01	LAP55735			25/04/2022
N114_059_34_01	LAP56022			25/04/2022
N114_059_34_01	LAP55920			25/04/2022
N114_059_34_01	LAP55784			25/04/2022
N114_059_34_01	LAP55927			25/04/2022
N114_059_34_01	LAP55926			25/04/2022
N114_059_34_01	LAP55925			25/04/2022
N114_059_34_01	LAP55928			25/04/2022
N114_059_34_01	LAP55922			25/04/2022
N114_059_34_01	LAP55921			25/04/2022
N114_059_34_01	LAP55707			25/04/2022
N114_059_34_01	LAP55745			25/04/2022
N114_061_01	LAP29068	WK512261	255	10/12/2019
N114_061_01	LAP28997			10/12/2019
N114_061_01	LAP29067			10/12/2019

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N114_061_02	LAP28998	WK512517	257	17/01/2020
N114_061_02	LAP29069			17/01/2020
N114_061_02	LAP28999			17/01/2020
N114_061_02	LAP29070			17/01/2020
N114_061_02	LAP29071			17/01/2020
N114_061_31_01	LAP55801	WK527392	839	09/05/2022
N114_061_31_01	LAP55806			09/05/2022
N114_062_01	LAP29018	WK511596	248	04/12/2019
N114_062_01	LAP29526	WK510906		04/12/2019
N114_062_01	LAP29017	WK510905		04/12/2019
N114_062_01	LAP29016			04/12/2019
N114_062_01	LAP29015			04/12/2019
N114_062_30_01	LAP54459	WK525071	652	20/02/2022
N114_062_30_01	LAP54499			20/02/2022
N114_064_01	LAP29316	MM154796	435	23/12/2020
N114_064_01	LAP29315	MM154866		23/12/2020
N114_064_01	LAP51103			23/12/2020
N114_064_01	LAP29312			23/12/2020
N114_064_01	LAP29311			23/12/2020
N114_064_01	LAP29318			23/12/2020
N114_064_01	LAP29309			23/12/2020
N114_064_01	LAP29314			23/12/2020
N114_064_01	LAP29310			23/12/2020
N114_064_01	LAP50789			23/12/2020
N114_064_01	LAP29313			23/12/2020
N114_064_03	LAP51810	MM150288	444	29/01/2021
N114_064_04	LAP29317	MM163554	483	09/12/2021
N114_064_31_01	LAP55709	MM169822	771	22/03/2022
N114_064_31_01	LAP55708			22/03/2022
N114_069_30_01	LAP50049	WK523827	546	07/12/2021
N114_072_20_01	LAP55070	WK526895	704	23/02/2022
N114_072_20_01	LAP55074			23/02/2022
N114_072_20_01	LAP55073			23/02/2022
N114_072_20_01	LAP51335			23/02/2022
N114_072_20_01	LAP51336			23/02/2022
N114_072_20_01	LAP55071			23/02/2022
N114_088_20_01	LAP55132	WK527845	889	03/05/2022
N114_088_20_01	LAP55133	WK527874		03/05/2022
N114_088_20_01	LAP55226	WK527875		03/05/2022
N114_088_20_01	LAP55224	WK527876		03/05/2022
N114_088_20_01	LAP55223	WK528910		03/05/2022
N114_088_20_01	LAP55273			03/05/2022
N114_088_20_01	LAP55225			03/05/2022
N114_088_20_01	LAP55227			03/05/2022
N114_088_20_01	LAP55274			03/05/2022
N114_088_20_01	LAP55876			03/05/2022
N114_088_20_01	LAP55877			03/05/2022
N114_101_01	LAP55142	WK525655	755	12/03/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N114_105_01	LAP55298	WK527837	801	03/05/2022
N114_105_01	LAP55305	MM173253		03/05/2022
N114_105_01	LAP55304			03/05/2022
N114_105_01	LAP55303			03/05/2022
N114_105_01	LAP55301			03/05/2022
N114_105_01	LAP55300			03/05/2022
N114_108_20_01	LAP55281	WK530300	813	19/04/2022
N114_108_20_01	LAP55912			19/04/2022
N114_108_20_01	LAP55878			19/04/2022
N114_108_20_01	LAP55879			19/04/2022
N114_108_20_01	LAP55880			19/04/2022
N114_108_20_01	LAP55283			19/04/2022
N114_108_20_01	LAP55282			19/04/2022
N114_111_01	LAP55537	WK525106	750	07/03/2022
N114_111_01	LAP55459	WK525130		07/03/2022
N114_113_01	LAP55863	MM171798	815	18/04/2022
N114_113_01	LAP55864			18/04/2022
N114_113_01	LAP55327			18/04/2022
N114_113_01	LAP55326			18/04/2022
N115_048_01	LAP28136	MM139317	210	07/11/2019
N115_048_01	LAP28134	MM139323		07/11/2019
N115_048_01	LAP28151			07/11/2019
N115_048_01	LAP28150			07/11/2019
N115_048_01	LAP28141			07/11/2019
N115_048_01	LAP28140			07/11/2019
N115_048_01	LAP28139			07/11/2019
N115_048_01	LAP28138			07/11/2019
N115_048_31_01	LAP55612	MM171136	715	15/04/2022
N115_048_31_01	LAP55940	MM171141		15/04/2022
N115_048_31_01	LAP55616			15/04/2022
N115_048_31_01	LAP56032			15/04/2022
N115_048_31_01	LAP55614			15/04/2022
N115_048_31_01	LAP55901			15/04/2022
N115_048_31_01	LAP55942			15/04/2022
N115_048_31_01	LAP56031			15/04/2022
N115_048_31_01	LAP56030			15/04/2022
N115_048_31_01	LAP56029			15/04/2022
N115_050_01	LAP29049	MM150307	284	30/01/2020
N115_050_01	LAP29047	MM150336		30/01/2020
N115_050_01	LAP29046			30/01/2020
N115_050_01	LAP29045			30/01/2020
N115_050_01	LAP29051			30/01/2020
N115_050_01	LAP29048			30/01/2020
N115_050_01	LAP29050			30/01/2020
N115_051_01	LAP50584	MM141538		366
N115_051_01	LAP28939	MM141553	24/04/2020	
N115_051_01	LAP28938		24/04/2020	
N115_051_01	LAP28941		24/04/2020	

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N115_051_35_01	LAP54129	MM162929	524	04/11/2021
N115_051_35_01	LAP53771	MM163009		04/11/2021
N115_051_35_01	LAP53720			04/11/2021
N115_051_35_01	LAP53722			04/11/2021
N115_051_35_01	LAP53721			04/11/2021
N115_051_35_01	LAP54130			04/11/2021
N115_051_35_01	LAP53723			04/11/2021
N115_052_21	LAP52206	MM152092	441	20/01/2021
N115_052_21	LAP52198	MM152095		20/01/2021
N115_052_21	LAP52199	MM152096		20/01/2021
N115_052_21	LAP52200	MM152098 (L C)		20/01/2021
N115_052_21	LAP52201	MM152099 (L C)		20/01/2021
N115_052_21	LAP52202	MM152148		20/01/2021
N115_052_21	LAP52203	MM152149		20/01/2021
N115_052_21	LAP52204	MM152150		20/01/2021
N115_052_21	LAP52205	MM152154 (L C)		20/01/2021
N115_052_21	LAP52207			20/01/2021
N115_052_21	LAP52208			20/01/2021
N115_052_21	LAP52209			20/01/2021
N115_052_21	LAP52210			20/01/2021
N115_052_21	LAP52211			20/01/2021
N115_052_21	LAP52212			20/01/2021
N115_052_21	LAP52213			20/01/2021
N115_052_21	LAP52214			20/01/2021
N115_052_21	LAP52215		20/01/2021	
N115_094_01	LAP55260	MM178170	886	01/04/2022
N115_094_01	LAP55280			01/04/2022
N115_094_01	LAP55916			01/04/2022
N115_094_01	LAP55917			01/04/2022
N115_096_20_01	LAP55644	MM173531	799	20/04/2022
N115_096_20_01	LAP55642	MM173562		20/04/2022
N115_096_20_01	LAP55230	MM173565		20/04/2022
N115_096_20_01	LAP55641			20/04/2022
N115_096_20_01	LAP55640			20/04/2022
N115_096_20_01	LAP55639			20/04/2022
N115_096_20_01	LAP55712			20/04/2022
N115_096_20_01	LAP55704			20/04/2022
N121_017_01	LAP26722	MM135016	221	14/11/2019
N121_017_01	LAP26721	MM135017		14/11/2019
N121_017_50_01	LAP30475	MM178811	828	11/05/2022
N121_017_50_01	LAP30455			11/05/2022
N121_019_01	LAP51758	MM160247	512	15/09/2021
N121_020_20_01	LAP54660	WK525052	711	01/03/2022
N121_020_20_01	LAP54659	WK525065		01/03/2022
N121_020_20_01	LAP54661			01/03/2022
N122_002_01	LAP22326	MM115427	69	03/04/2018
N122_002_01	LAP20017			03/04/2018
N122_002_01	LAP20016			03/04/2018
N122_002_30_01	LAP55461	MM169989	672	02/03/2022
N122_002_30_01	LAP55462			02/03/2022

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N122_006_02	LAP21979	WM803459	50	19/02/2018
N122_006_02	LAP21891	WM771529		19/02/2018
N122_006_02	LAP21892	WM638441		19/02/2018
		WM590733 WM576817 MM115359 MM115360 MM115361		
N122_006_30_01	LAP54956		610	28/01/2022
N122_006_30_01	LAP55054			28/01/2022
N122_006_30_01	LAP54955			28/01/2022
N122_006_30_01	LAP54957			28/01/2022
N122_006_30_01	LAP54954			28/01/2022
N122_019_01	LAP23414	MM115485	75	01/05/2018
N122_019_01	LAP23406	WK143447 (C)		01/05/2018
N122_019_01	LAP23407	WK150553 (C)		01/05/2018
N122_019_01	LAP23410	WK195243 (C)		01/05/2018
N122_019_01	LAP23403	WK215128 (C)		01/05/2018
N122_019_01	LAP23405	WK229584 (C)		01/05/2018
N122_019_01	LAP23400	WM308004 (C)		01/05/2018
N122_019_01	LAP23413	WM311470 (C)		01/05/2018
N122_019_01	LAP23411	WM449079 (C)		01/05/2018
N122_019_01	LAP23402	WM494947 (C)		01/05/2018
N122_019_01	LAP23404	WM564267 (C)		01/05/2018
N122_019_01	LAP23409	WM632842 (C)		01/05/2018
N122_019_01	LAP23401	WM713752 (C)		01/05/2018
N122_019_01	LAP23408	WM825618 (C)		01/05/2018
N122_019_01	LAP23412	WM154994 (C)	01/05/2018	
N122_019_30_01	LAP55953	MM180807	739	19/05/2022
N122_019_30_01	LAP55954			19/05/2022
N122_019_30_01	LAP55945			19/05/2022
N122_019_30_01	LAP55944			19/05/2022
N122_019_30_01	LAP55952			19/05/2022
N122_019_30_01	LAP55950			19/05/2022
N122_019_30_01	LAP55949			19/05/2022
N122_019_30_01	LAP55943			19/05/2022
N122_019_30_01	LAP55947			19/05/2022
N122_019_30_01	LAP55955			19/05/2022
N122_019_30_01	LAP55951			19/05/2022
N122_019_30_01	LAP55948			19/05/2022
N122_019_30_01	LAP55956			19/05/2022
N122_019_30_01	LAP55946			19/05/2022
N122_019_30_01	LAP55729		19/05/2022	
N122_032_01	LAP29086	WM894250	204	23/10/2019
N122_032_01	LAP29104	WM35712		23/10/2019
N122_034_01	LAP50567	MM141295	307	11/03/2020
N122_034_01	LAP50566			11/03/2020
N122_050_20_01	LAP55368	MM178807	873	28/04/2022
N122_050_20_01	LAP55369	MM178813		28/04/2022
N122_050_20_01	LAP55371			28/04/2022
N122_050_20_01	LAP55373			28/04/2022
N122_050_20_01	LAP55366			28/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N122_050_20_02_01	LAP55406		914	22/02/2023
N122_050_20_02_01	LAP55365			22/02/2023
N122_050_20_02_01	LAP55367			22/02/2023
N131_001_01	LAP24156	MM123586	39	19/01/2018
N131_001_01	LAP24155			19/01/2018
N131_001_01	LAP24157			19/01/2018
N131_001_01	LAP24154			19/01/2018
N131_001_02	LAP24158	MM41973	41	24/01/2018
N131_001_02	LAP24159	MM44192		24/01/2018
N131_001_02	LAP24160			24/01/2018
N131_001_02	LAP24161			24/01/2018
N131_001_03	LAP24202	MM12185	42	30/01/2018
N131_001_03	LAP24201			30/01/2018
N131_018_01	LAP22567	MM7344 MM57257 MM74435 MM84251 WM702839 WM702840 WM724688 WM744578	57	13/03/2018
N131_018_50_01	LAP09499		556	16/05/2022
N131_018_50_01	LAP07653			16/05/2022
N131_018_50_01	LAP07004			16/05/2022
N131_018_50_01	LAP07652			16/05/2022
N131_029_01	LAP25949	MM121166	109	09/01/2019
N131_029_01	LAP25947			09/01/2019
N131_029_01	LAP25946			09/01/2019
N131_029_01	LAP26648			09/01/2019
N131_029_50_01	LAP09493	MM174645	770	08/05/2022
N131_029_50_01	LAP09492			08/05/2022
N131_030_01	LAP25952	MM139412	223	30/10/2019
N131_030_01	LAP25953			30/10/2019
N131_030_01	LAP25954			30/10/2019
N131_030_01	LAP28673			30/10/2019
N131_030_01	LAP29092			30/10/2019
N131_030_01	LAP29093			30/10/2019
N131_030_01	LAP29102			30/10/2019
N131_030_01	LAP28153			30/10/2019
N131_030_01	LAP28666			30/10/2019
N131_030_01	LAP25956			30/10/2019
N131_030_50_01	LAP07623	MM173777	827	05/05/2022
N131_030_50_01	LAP07632			05/05/2022
N131_030_50_01	LAP07631			05/05/2022
N131_030_50_01	LAP07624			05/05/2022
N131_030_50_01	LAP07630			05/05/2022
N131_030_50_01	LAP07629			05/05/2022
N131_030_50_01	LAP07628			05/05/2022
N131_030_50_01	LAP07626			05/05/2022
N131_031_01	LAP26434	MM172118	824	08/05/2022
N131_031_01	LAP26697	MM173516 MM179213		08/05/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N131_033_01	LAP27205	MM35053	375	15/05/2020
N131_033_01	LAP27203	MM34013		15/05/2020
N131_033_01	LAP27201	MM66113		15/05/2020
N131_033_01	LAP27204	WM639627		15/05/2020
N131_033_01	LAP27202			15/05/2020
N131_033_01	LAP27199			15/05/2020
N131_033_01	LAP27200			15/05/2020
N131_033_01	LAP27883			15/05/2020
N131_033_01	LAP27885			15/05/2020
N131_033_01	LAP27886			15/05/2020
N131_035_01	LAP51259	MM145527		404
N131_035_01	LAP50372		12/09/2020	
N131_035_01	LAP51258		12/09/2020	
N131_035_30_01	LAP55633	MM170884	694	12/04/2022
N131_037_01	LAP50947	MM154077	396	18/06/2020
N131_037_01	LAP50946			18/06/2020
N131_039_01	LAP50948	MM143480	395	19/06/2020
N131_039_01	LAP51202			19/06/2020
N131_039_01	LAP50950			19/06/2020
N131_039_01	LAP50949			19/06/2020
N131_040_01	LAP51292	MM144414	394	07/08/2020
N131_042_20_01	LAP52511	MM172761	902	08/05/2022
N131_042_20_01	LAP52510			08/05/2022
N131_042_20_01	LAP55830			08/05/2022
N131_042_20_01	LAP55829			08/05/2022
N131_042_20_01	LAP52519			08/05/2022
N131_042_20_01	LAP52517			08/05/2022
N131_042_20_01	LAP52516			08/05/2022
N131_042_20_01	LAP52515			08/05/2022
N131_042_20_01	LAP52512			08/05/2022
N131_043_20_01	LAP55684	MM173516	811	05/05/2022
N131_043_20_01	LAP55685			05/05/2022
N131_043_20_01	LAP55686			05/05/2022
N131_043_20_01	LAP54382			05/05/2022
N131_043_20_01	LAP54384			05/05/2022
N131_043_20_01	LAP55683			05/05/2022
N132_002_01	LAP20103	WM647117	47	12/03/2018
N132_010_02	LAP22292	MM128313	84	20/06/2018
N132_010_02	LAP22288	WM430779		20/06/2018
N132_010_02	LAP22286	WM662126		20/06/2018
N132_010_02	LAP22293	WM354822		20/06/2018
N132_010_02	LAP22281	WM360545		20/06/2018
N132_010_02	LAP22284	MM128314		20/06/2018
N132_010_02	LAP22289	MM128315		20/06/2018
N132_010_02	LAP22291	MM177735		20/06/2018
		WK77732		
		WM360545		
		WM915844		
		WM472145		

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N132_010_30_01	LAP55339	MM172161	651	08/03/2022
N132_010_30_01	LAP55340			08/03/2022
N132_010_30_01	LAP55338			08/03/2022
N132_010_30_01	LAP55341			08/03/2022
N132_010_30_01	LAP55342			08/03/2022
N132_028_01	LAP22511	MM115733	85	12/07/2018
N132_028_01	LAP22512	WM221486(C)		12/07/2018
N132_028_01	LAP24871	WM431902(C)		12/07/2018
N132_028_01	LAP22505	WM874189(C/L)		12/07/2018
N132_028_01	LAP24742	WM980680(C/L)		12/07/2018
N132_028_01	LAP22508	WM901261(C/L)		12/07/2018
N132_028_01	LAP22510			12/07/2018
N132_028_50_01	LAP06578	MM177561	561	25/04/2022
N132_028_50_01	LAP07486			25/04/2022
N132_028_50_01	LAP06576			25/04/2022
N132_028_50_01	LAP06577			25/04/2022
N132_028_50_01	LAP06579			25/04/2022
N132_031_01	LAP27446	MM155176	389	05/06/2020
N132_031_01	LAP27448	WM923214		05/06/2020
N132_031_01	LAP27447			05/06/2020
N132_031_01	LAP29270			05/06/2020
N132_031_01	LAP27529			05/06/2020
N132_031_01	LAP27284			05/06/2020
N132_031_01	LAP27290			05/06/2020
N132_031_01	LAP27289			05/06/2020
N132_031_01	LAP27288			05/06/2020
N132_031_01	LAP27283			05/06/2020
N132_031_01	LAP27528			05/06/2020
N132_031_01	LAP27530			05/06/2020
N132_031_01	LAP27443			05/06/2020
N132_031_50_01	LAP07453	MM168122		595
N132_031_50_01	LAP07444		26/01/2022	
N132_031_50_01	LAP07454		26/01/2022	
N132_031_50_01	LAP07455		26/01/2022	
N132_031_50_01	LAP07443		26/01/2022	
N132_031_50_01	LAP07445		26/01/2022	
N132_031_50_01	LAP07446		26/01/2022	
N132_031_50_01	LAP07447		26/01/2022	
N132_031_50_01	LAP07448		26/01/2022	
N132_031_50_01	LAP07449		26/01/2022	
N132_031_50_01	LAP07450		26/01/2022	
N132_031_50_01	LAP07451		26/01/2022	
N132_031_50_01	LAP07452		26/01/2022	
N132_034_01	LAP25643	MM118805	97	26/09/2018
N132_034_01	LAP25647	WM189676		26/09/2018
N132_034_01	LAP25646	WM909207		26/09/2018
N132_034_01	LAP25644	(WM410238		26/09/2018
N132_034_01	LAP25640	WK122505		26/09/2018
N132_034_01	LAP25648	WK187312 LH)		26/09/2018
N132_034_01	LAP25820	MM15095(LH)		26/09/2018
		WM767382		
		WM759492		
		WM846089		

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N132_034_02	LAP25642	MM121079	98	26/09/2018
N132_034_02	LAP25641	MM121080 MM121081 WM858021 (L) C		26/09/2018
N132_034_32_01	LAP54812	MM169380	609	12/02/2022
N132_035_01	LAP25106	MM118563	95	20/09/2018
N132_035_01	LAP25712	MM118559 WM969158		20/09/2018
N132_035_31_01	LAP53178	MM158957 MM158961	496	24/07/2021
N132_035_32_01	LAP53179	MM157809	495	24/07/2021
N132_041_01	LAP25107	MM120565	94	03/10/2018
N132_042_01	LAP25103	MM146697	322	25/09/2020
N132_044_01	LAP26441	MM144398	122	07/06/2019
N132_044_01	LAP26440	WM710224 (C)		07/06/2019
N132_045_01	LAP26565	MM154848	452	11/03/2021
N132_045_01	LAP26563	MM155206		11/03/2021
N132_045_01	LAP26564			11/03/2021
N132_045_30_01	LAP54902	MM166912	577	09/02/2022
N132_045_30_01	LAP54901			09/02/2022
N132_045_30_01	LAP54900			09/02/2022
N132_046_01	LAP27088	MM125015	112	03/02/2019
N132_049_01	LAP27751	MM137403	253	04/12/2019
N132_052_01	LAP28828	MM141451	283	05/02/2020
N132_052_01	LAP28829	MM141452		05/02/2020
N132_052_01	LAP28961	WM373877 (C)		05/02/2020
N132_052_01	LAP28667			05/02/2020
N132_052_01	LAP28668			05/02/2020
N132_052_01	LAP28669			05/02/2020
N132_052_30_01	LAP55605	MM167660	650	28/02/2022
N132_055_01	LAP28967	MM137548	230	21/11/2019
N132_055_01	LAP28965	MM137550		21/11/2019
N132_056_01	LAP28842	MM137781	275	17/01/2020
N132_056_01	LAP28841			17/01/2020
N132_056_01	LAP28845			17/01/2020
N132_056_01	LAP28846			17/01/2020
N132_056_01	LAP28847			17/01/2020
N132_056_01	LAP28843			17/01/2020
N132_056_30_01	LAP55411	MM168376	717	07/03/2022
N132_057_01	LAP29499	MM141045	276	16/01/2020
N132_057_01	LAP29528			16/01/2020
N132_057_01	LAP29497			16/01/2020
N132_057_01	LAP29498			16/01/2020
N132_057_30_01	LAP56241	MM179318	913	12/05/2022
N132_057_50_01	LAP07604	MM166163	611	26/01/2022
N132_057_50_01	LAP07603			26/01/2022
N132_063_01	LAP50702	MM141932	321	24/04/2020
N132_063_01	LAP50701	WM523745		24/04/2020
N132_063_30_01	LAP54909	MM162204	533	06/11/2021
N132_063_30_01	LAP54783	WM523745		06/11/2021
N132_065_01	LAP51397	MM142585	386	26/05/2020
N132_065_01	LAP50806			26/05/2020

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N132_069_01	LAP50795	MM172406	823	09/05/2022
N132_069_01	LAP50796	MM172440		09/05/2022
N132_070_01	LAP53147	MM154793	457	26/05/2021
N132_070_01	LAP53148			26/05/2021
N132_070_01	LAP51691			26/05/2021
N132_070_01	LAP52167			26/05/2021
N132_073_01	LAP51414	MM150369	430	10/12/2020
N132_073_50_01	LAP07475	MM163610	536	10/11/2021
N132_075_01	LAP51658	MM151752	450	25/02/2021
N132_075_01	LAP51791			25/02/2021
N132_075_01	LAP51792			25/02/2021
N132_075_01	LAP51799			25/02/2021
N132_075_01	LAP51583			25/02/2021
N132_075_01	LAP51587			25/02/2021
N132_075_01	LAP51650			25/02/2021
N132_075_01	LAP51580			25/02/2021
N132_075_01	LAP51586			25/02/2021
N132_075_01	LAP51585			25/02/2021
N132_075_01	LAP51581			25/02/2021
N132_075_01	LAP51578			25/02/2021
N132_075_01	LAP51588			25/02/2021
N132_075_01	LAP51573			25/02/2021
N132_075_01	LAP51572			25/02/2021
N132_075_01	LAP51571			25/02/2021
N132_075_50_01	LAP06758	MM164128	537	18/11/2021
N132_075_50_01	LAP06757	MM164129		18/11/2021
N132_075_50_01	LAP06756	MM164136		18/11/2021
N132_075_50_01	LAP06755			18/11/2021
N132_075_50_01	LAP06752			18/11/2021
N132_075_50_01	LAP08197			18/11/2021
N132_075_50_01	LAP06759			18/11/2021
N132_075_50_01	LAP06746			18/11/2021
N132_075_50_01	LAP06751			18/11/2021
N132_075_50_01	LAP06750			18/11/2021
N132_075_50_01	LAP06749			18/11/2021
N132_075_50_01	LAP06754			18/11/2021
N132_075_50_01	LAP06747			18/11/2021
N132_075_50_01	LAP06745			18/11/2021
N132_075_50_01	LAP06744			18/11/2021
N132_075_50_01	LAP06748			18/11/2021
N132_086_01	LAP52168	MM154471	454	12/03/2021
N132_086_01	LAP52169			12/03/2021
N132_088_01	LAP52535	MM154087	453	09/04/2021
N132_088_01	LAP52536			09/04/2021
N132_089_01	LAP52975	MM154472	470	22/04/2021
N132_089_01	LAP52571			22/04/2021
N132_091_21	LAP52998	MM163720 MM163733 MM163737	545	09/12/2021

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N132_111_20_02	LAP55618	MM174597	925	23/05/2022
N132_111_20_02	LAP55619	MM174605		23/05/2022
N132_111_20_02	LAP55620	MM174609		23/05/2022
N132_111_20_02	LAP55803	MM174614		23/05/2022
N132_111_20_02	LAP55635	MM174618		23/05/2022
N132_111_20_02	LAP55621	MM180411		23/05/2022
N132_111_20_02	LAP25712			23/05/2022
N132_111_20_02	LAP55567			23/05/2022
N132_111_20_02	LAP55617			23/05/2022
N132_111_20_02	LAP55622			23/05/2022
N132_112_01	LAP55628	MM173419	804	09/05/2022
N132_112_01	LAP55629	MM173454		09/05/2022
N132_504_40_01	LAP07591	MM172606	903	22/05/2022
N132_504_40_01	LAP07592	MM174520		22/05/2022
N132_504_40_01	LAP07593			22/05/2022
N132_504_40_01	LAP07594			22/05/2022
N211_005_01	LAP20058	WK502697	89	19/08/2018
N211_092_01	LAP24974	WK505249 WK505250(L)	106	13/12/2018
N211_092_50_01	LAP07144	WK521707 WK521708	507	29/08/2021
N211_112_01	LAP27312	WK468981	102	21/11/2018
N211_112_01	LAP27310			21/11/2018
N211_112_01	LAP27311			21/11/2018
N211_112_02	LAP27313	WK470726	103	22/11/2018
N211_112_02	LAP27314			22/11/2018
N211_112_50_01	LAP07498	WK524644	543	07/12/2021
N211_112_50_01	LAP07500			07/12/2021
N211_112_50_01	LAP07499			07/12/2021
N211_112_51_01	LAP07502	WK531688	579	12/01/2022
N211_112_51_01	LAP07501			12/01/2022
N211_119_01	LAP28372	WK513310	131	03/01/2020
N211_119_01	LAP28163			03/01/2020
N211_119_01	LAP28371			03/01/2020
N211_119_50_01	LAP06290	WK528124	550	11/05/2022
N211_119_50_01	LAP06288			11/05/2022
N211_119_50_01	LAP06289			11/05/2022
N211_120_01	LAP26388	MM137898	215	06/11/2019
N211_120_01	LAP26390	WK510842		06/11/2019
N211_120_01	LAP26391			06/11/2019
N211_120_01	LAP26392			06/11/2019

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N211_121_01	LAP27118	MM126614	123	22/05/2019
N211_121_01	LAP27124	MM126616		22/05/2019
N211_121_01	LAP27129	MM126617		22/05/2019
N211_121_01	LAP27701	MM126618		22/05/2019
N211_121_01	LAP27702	MM126619		22/05/2019
N211_121_01	LAP26546	MM126623		22/05/2019
N211_121_01	LAP26548	MM126628		22/05/2019
N211_121_01	LAP26550	WK514254		22/05/2019
N211_121_01	LAP26549	WM129764		22/05/2019
N211_121_01	LAP26554			22/05/2019
N211_121_01	LAP26552			22/05/2019
N211_121_01	LAP26555			22/05/2019
N211_121_01	LAP26556			22/05/2019
N211_121_01	LAP26558			22/05/2019
N211_121_01	LAP26559			22/05/2019
N211_121_50_01	LAP07300	MM171453		852
N211_121_50_01	LAP07296	MM171460	18/04/2022	
N211_121_50_01	LAP07297		18/04/2022	
N211_121_50_01	LAP07299		18/04/2022	
N211_121_50_01	LAP07306		18/04/2022	
N211_121_50_01	LAP07301		18/04/2022	
N211_121_50_01	LAP07302		18/04/2022	
N211_121_50_01	LAP07303		18/04/2022	
N211_121_50_01	LAP07304		18/04/2022	
N211_121_50_01	LAP07305		18/04/2022	
N211_121_50_01	LAP07309		18/04/2022	
N211_121_50_01	LAP30457		18/04/2022	
N211_121_50_01	LAP30456		18/04/2022	
N211_144_01	LAP27434	WK505324	121	
N211_144_01	LAP27705	WK505415		05/05/2019
N211_144_01	LAP27706			05/05/2019
N211_144_30_01	LAP52802	WK522267	520	26/09/2021
N211_153_01	LAP28312	WK510451	256	10/12/2019
N211_153_01	LAP50685			10/12/2019
N211_153_30_01	LAP54894	WK526072	729	07/03/2022
N211_156_01	LAP28070	WK512812	126	01/07/2019
N211_156_01	LAP28780			01/07/2019
N211_156_01	LAP28071			01/07/2019
N211_156_31	LAP55783	WK530280	803	19/04/2022
N211_162_01	LAP50536		384	27/05/2020
N211_162_01	LAP29241			27/05/2020
N211_162_01	LAP29194			27/05/2020
N211_162_01	LAP50534			27/05/2020
N211_162_01	LAP50535			27/05/2020
N211_163_03	LAP50776	WK458831(C)	355	21/04/2020
N211_163_03	LAP28331	WK513971		21/04/2020
N211_163_03	LAP28329	WK513980		21/04/2020
N211_163_03	LAP50779	WK513981		21/04/2020
N211_163_03	LAP28332	WK514286		21/04/2020
N211_163_03	LAP28330			21/04/2020
N211_163_03	LAP28328			21/04/2020
N211_163_03	LAP28327			21/04/2020
N211_163_03	LAP28323			21/04/2020

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N211_163_30_01	LAP52286	WK513980	474	12/05/2021
N211_163_30_01	LAP52060	WK519801		12/05/2021
N211_163_30_01	LAP52055	WK519281		12/05/2021
N211_163_30_01	LAP52052			12/05/2021
N211_163_30_01	LAP52053			12/05/2021
N211_163_30_01	LAP52054			12/05/2021
N211_163_50_01	LAP07079	WK526464	737	06/05/2022
N211_163_50_01	LAP07074			06/05/2022
N211_163_50_01	LAP07075			06/05/2022
N211_163_50_01	LAP07076			06/05/2022
N211_163_50_01	LAP07077			06/05/2022
N211_163_50_01	LAP07080			06/05/2022
N211_163_50_01	LAP08862			06/05/2022
N211_163_50_01	LAP08861			06/05/2022
N211_163_50_01	LAP07078			06/05/2022
N211_170_01	LAP29074	WK511454	174	27/08/2019
N211_170_01	LAP29078	WK511455		27/08/2019
N211_170_01	LAP29073			27/08/2019
N211_170_01	LAP29079			27/08/2019
N211_170_01	LAP29167			27/08/2019
N211_170_01	LAP29077			27/08/2019
N211_170_01	LAP29075			27/08/2019
N211_170_01	LAP29081			27/08/2019
N211_170_01	LAP29166			27/08/2019
N211_170_50_01	LAP06734	WK527055	722	09/05/2022
N211_170_50_01	LAP07487	WK529902		09/05/2022
N211_170_50_01	LAP06742			09/05/2022
N211_170_50_01	LAP06741			09/05/2022
N211_170_50_01	LAP06740			09/05/2022
N211_170_50_01	LAP06739			09/05/2022
N211_170_50_01	LAP06737			09/05/2022
N211_170_50_01	LAP06736			09/05/2022
N211_170_50_01	LAP06738			09/05/2022
N211_170_50_01	LAP07488			09/05/2022
N211_170_50_01	LAP06735			09/05/2022
N211_170_50_01	LAP06743			09/05/2022
N211_171_01	LAP29126	WK420754(L)	173	27/08/2019
N211_171_01	LAP29121	WK511444		27/08/2019
N211_171_01	LAP29124	WK511445		27/08/2019
N211_171_01	LAP29125			27/08/2019
N211_171_01	LAP29108			27/08/2019
N211_171_01	LAP29127			27/08/2019
N211_171_01	LAP29118			27/08/2019
N211_171_01	LAP29109			27/08/2019
N211_171_01	LAP29143			27/08/2019
N211_171_01	LAP29107			27/08/2019

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N211_171_50_01	LAP07264		818	15/04/2022
N211_171_50_01	LAP07262			15/04/2022
N211_171_50_01	LAP07260			15/04/2022
N211_171_50_01	LAP07261			15/04/2022
N211_171_50_01	LAP07096			15/04/2022
N211_171_50_01	LAP07269			15/04/2022
N211_171_50_01	LAP07268			15/04/2022
N211_171_50_01	LAP07263			15/04/2022
N211_171_50_01	LAP07265			15/04/2022
N211_171_50_01	LAP07266			15/04/2022
N211_171_50_01	LAP07267			15/04/2022
N211_172_01	LAP29136	WK511697		175
N211_172_01	LAP29097	WK511700	27/08/2019	
N211_172_01	LAP29096		27/08/2019	
N211_172_01	LAP29095		27/08/2019	
N211_172_01	LAP29101		27/08/2019	
N211_172_01	LAP29132		27/08/2019	
N211_172_01	LAP29131		27/08/2019	
N211_172_01	LAP29129		27/08/2019	
N211_172_01	LAP29098		27/08/2019	
N211_172_01	LAP29130		27/08/2019	
N211_172_01	LAP29133		27/08/2019	
N211_172_01	LAP29128		27/08/2019	
N211_172_01	LAP29135		27/08/2019	
N211_172_01	LAP29134		27/08/2019	
N211_172_01	LAP29094		27/08/2019	
N211_172_01	LAP29138		27/08/2019	
N211_172_30_01	LAP52068	WK519417	475	23/05/2021
N211_172_30_01	LAP52069			23/05/2021
N211_172_30_01	LAP52070			23/05/2021
N211_172_50_01	LAP07066	WK526787	757	14/03/2022
N211_172_50_01	LAP07065			14/03/2022
N211_172_50_01	LAP07063			14/03/2022
N211_172_50_01	LAP07064			14/03/2022
N211_172_51_01	LAP07098	WK527776	661	18/04/2022
N211_172_51_01	LAP07097			18/04/2022
N211_173_03	LAP29367	WK512873	361	24/04/2020
N211_173_03	LAP29366	WK517727		24/04/2020
N211_173_03	LAP29656			24/04/2020
N211_173_03	LAP29371			24/04/2020
N211_173_03	LAP29370			24/04/2020
N211_173_03	LAP29365			24/04/2020
N211_173_03	LAP29369			24/04/2020
N211_173_03	LAP29657			24/04/2020
N211_173_03	LAP29368			24/04/2020
N211_173_50_01	LAP07150	WK526441	732	07/03/2022
N211_173_50_01	LAP07149			07/03/2022
N211_173_50_01	LAP07146			07/03/2022
N211_173_50_01	LAP07147			07/03/2022
N211_173_50_01	LAP07153			07/03/2022
N211_173_50_01	LAP07154			07/03/2022
N211_173_50_01	LAP07152			07/03/2022
N211_173_50_01	LAP07151			07/03/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N211_174_01	LAP51108	WK512960	385	27/05/2020
N211_174_50_01	LAP07333	MM169817	720	15/03/2022
N211_175_01	LAP29305	WK512613	300	04/03/2020
N211_175_01	LAP29322			04/03/2020
N211_175_01	LAP29319			04/03/2020
N211_175_30_01	LAP52037	WK512613	476	12/05/2021
N211_175_30_01	LAP52036	WK519167		12/05/2021
N211_176_01	LAP29858	MM140403	315	07/03/2020
N211_176_31	LAP51990	MM140403	427	10/01/2021
N211_178_03	LAP29568	WK512364	351	17/04/2020
N211_178_50_01	LAP07208	WK522814	522	04/10/2021
N211_179_03	LAP29474	MM141038	357	17/04/2020
N211_179_03	LAP50838	MM142037 MM142038		17/04/2020
N211_179_50_01	LAP07187	MM172044	718	02/03/2022
N211_179_50_01	LAP07186	MM172069		02/03/2022
N211_180_01	LAP50399	WK515404	417	23/10/2020
N211_180_01	LAP50398			23/10/2020
N211_180_01	LAP50400			23/10/2020
N211_180_30_01	LAP52034	WK519172	477	20/05/2021
N211_180_30_01	LAP52033			20/05/2021
N211_181_03	LAP29688		354	24/04/2020
N211_181_03	LAP29689			24/04/2020
N211_181_03	LAP29690			24/04/2020
N211_181_03	LAP29691			24/04/2020
N211_181_03	LAP29693			24/04/2020
N211_181_03	LAP29694			24/04/2020
N211_181_03	LAP29692			24/04/2020
N211_181_03	LAP29682			24/04/2020
N211_181_03	LAP29683			24/04/2020
N211_181_03	LAP29684			24/04/2020
N211_181_03	LAP29685			24/04/2020
N211_181_03	LAP29686			24/04/2020
N211_181_03	LAP29687			24/04/2020
N211_181_50_01	LAP06733		666	14/03/2022
N211_181_50_01	LAP06730			14/03/2022
N211_181_50_01	LAP06721			14/03/2022
N211_181_50_01	LAP06732			14/03/2022
N211_182_01	LAP52503	WK518278	436	13/01/2021
N211_182_01	LAP52502			13/01/2021
N211_183_01	LAP29989	WK514453	413	25/09/2020
N211_183_01	LAP29990			25/09/2020
N211_183_50_01	LAP06192	WK521710	510	12/09/2021
N211_183_50_01	LAP09428			12/09/2021
N211_184_03	LAP29580	WK512657	353	24/04/2020
N211_184_03	LAP29577			24/04/2020
N211_184_03	LAP29576			24/04/2020
N211_184_03	LAP29579			24/04/2020
N211_184_03	LAP29575			24/04/2020
N211_184_50_01	LAP07195	WK524841	665	20/02/2022
N211_184_50_01	LAP07191			20/02/2022
N211_184_50_01	LAP07197			20/02/2022
N211_184_50_01	LAP07193			20/02/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N211_185_03	LAP50283	WK512384	360	17/04/2020
N211_185_30_01	LAP55850	WK526911	863	30/04/2022
N211_192_01	LAP29698	WK513217	376	19/05/2020
N211_192_01	LAP29701			19/05/2020
N211_192_01	LAP29703			19/05/2020
N211_192_01	LAP50504			19/05/2020
N211_192_01	LAP29699			19/05/2020
N211_192_01	LAP29704			19/05/2020
N211_192_01	LAP50505			19/05/2020
N211_219_01	LAP29855	MM143260	397	24/06/2020
N211_219_01	LAP29859			24/06/2020
N211_219_01	LAP29857			24/06/2020
N211_219_01	LAP51270			24/06/2020
N211_219_30_01	LAP54566		541	07/12/2021
N211_220_01	LAP51344	MM147007	415	16/10/2020
N211_220_01	LAP51345	MM147024		16/10/2020
N211_220_01	LAP50597	MM147033		16/10/2020
N211_220_01	LAP50599	MM147038		16/10/2020
N211_220_01	LAP50598	WM856275		16/10/2020
N211_220_01	LAP51342			16/10/2020
N211_220_01	LAP51339			16/10/2020
N211_220_01	LAP51338			16/10/2020
N211_220_01	LAP50591			16/10/2020
N211_220_01	LAP50594			16/10/2020
N211_220_01	LAP50592			16/10/2020
N211_220_01	LAP50595			16/10/2020
N211_220_31	LAP52001	MM147007	440	10/01/2021
N211_220_31	LAP52002	MM147024		10/01/2021
N211_220_31	LAP52007			10/01/2021
N211_220_31	LAP52014			10/01/2021
N211_220_31	LAP52013			10/01/2021
N211_220_31	LAP52012			10/01/2021
N211_220_31	LAP52011			10/01/2021
N211_220_31	LAP52010			10/01/2021
N211_220_31	LAP52004			10/01/2021
N211_220_31	LAP52009			10/01/2021
N211_220_31	LAP52008			10/01/2021
N211_220_31	LAP52005			10/01/2021
N211_220_31	LAP52006			10/01/2021
N211_220_31	LAP52003			10/01/2021
N211_223_01	LAP50989	MM148563	416	14/10/2020
N211_223_01	LAP50973	MM148576		14/10/2020
N211_223_01	LAP50624	WK516110		14/10/2020
N211_223_01	LAP51489	WK516111		14/10/2020
N211_223_30_01	LAP56120	MM173303	812	21/04/2022
N211_223_30_01	LAP52964	MM173309		21/04/2022
N211_223_30_01	LAP52920			21/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N211_224_20_01	LAP53886	MM173057	897	16/05/2022
N211_224_20_01	LAP55503	MM173060		16/05/2022
N211_224_20_01	LAP55007	MM173063		16/05/2022
N211_224_20_01	LAP55012	MM173068		16/05/2022
N211_224_20_01	LAP55903	MM178277		16/05/2022
N211_224_20_01	LAP53874	(WM487161M&B)		16/05/2022
N211_224_20_01	LAP53875			16/05/2022
N211_224_20_01	LAP53880			16/05/2022
N211_224_20_01	LAP53882			16/05/2022
N211_224_20_01	LAP53885			16/05/2022
N211_224_20_01	LAP55904			16/05/2022
N211_224_20_01	LAP55009			16/05/2022
N211_224_20_01	LAP53870			16/05/2022
N211_224_20_01	LAP55502			16/05/2022
N211_224_20_01	LAP53888			16/05/2022
N211_224_20_01	LAP55011			16/05/2022
N211_224_20_01	LAP55010			16/05/2022
N211_224_20_01	LAP55008			16/05/2022
N211_224_20_01	LAP53871			16/05/2022
N211_224_20_01	LAP53873			16/05/2022
N211_224_20_01	LAP53942		16/05/2022	
N211_224_20_01	LAP55905		16/05/2022	
N211_224_20_01	LAP53890		16/05/2022	
N211_224_20_01	LAP55733		16/05/2022	
N211_224_20_03_01	LAP55734	MM173543	901	09/05/2022
N211_224_20_03_01	LAP55166	MM173550		09/05/2022
N211_224_20_03_01	LAP53891	MM173551		09/05/2022
N211_224_20_03_01	LAP53879			09/05/2022
N211_224_20_03_01	LAP53881			09/05/2022
N211_224_20_03_01	LAP53883			09/05/2022
N211_224_20_03_01	LAP53884			09/05/2022
N211_224_20_03_01	LAP53878			09/05/2022
N211_226_02	LAP51226	MM150893	445	03/02/2021
N211_226_02	LAP52288			03/02/2021
N211_226_50_01	LAP07332	MM162276	527	24/10/2021
N211_226_50_01	LAP07331			24/10/2021
N211_265_20_01	LAP53849	MM172561	893	09/05/2022
N211_265_20_01	LAP54353	MM172614		09/05/2022
N211_265_20_01	LAP55030	MM172616		09/05/2022
N211_265_20_01	LAP55031	MM172627		09/05/2022
N211_265_20_01	LAP55032	MM173955		09/05/2022
N211_265_20_01	LAP55033			09/05/2022
N211_265_20_01	LAP55039			09/05/2022
N211_265_20_01	LAP55038			09/05/2022
N211_265_20_01	LAP55035			09/05/2022
N211_265_20_01	LAP55034			09/05/2022
N211_265_20_01	LAP55041			09/05/2022
N211_265_20_01	LAP55042			09/05/2022
N211_265_20_01	LAP55044			09/05/2022
N211_265_20_01	LAP55036			09/05/2022
N211_265_20_01	LAP55037			09/05/2022
N211_265_20_01	LAP55040			09/05/2022
N211_265_20_01	LAP55043			09/05/2022

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N211_269_20_01	LAP53585	WK526004	744	07/03/2022
N211_289_01	LAP54585	MM147024 MM157733	501	30/07/2021
N211_291_21	LAP56422	WK523260	551	05/12/2021
N211_292_20_01	LAP54740	MM176427	915	12/05/2022
N211_292_20_01	LAP54741			12/05/2022
N211_293_01	LAP54749	MM163799	540	15/12/2021
N211_293_01	LAP54747			15/12/2021
N211_294_01	LAP54915	WK526109	697	01/03/2022
N211_297_20_01	LAP54949	MM172908	849	21/04/2022
N211_297_20_01	LAP55024	MM173596		21/04/2022
N211_297_20_01	LAP55019	WM903019		21/04/2022
N211_297_20_01	LAP55310			21/04/2022
N211_297_20_03	LAP54948	MM173759	862	08/05/2022
N211_297_20_03	LAP55020	MM173760		08/05/2022
N211_297_20_03	LAP55025			08/05/2022
N211_299_20_01	LAP55082	MM169700	724	04/03/2022
N211_299_20_01	LAP55081	MM169704		04/03/2022
N211_299_20_01	LAP55080	MM169705		04/03/2022
N211_301_20_01	LAP54950	MM172050	826	13/04/2022
N211_302_20_01	LAP55189	MM172891	900	13/05/2022
N211_302_20_01	LAP55102	MM172929		13/05/2022
N211_302_20_01	LAP55103	MM172933		13/05/2022
N211_302_20_01	LAP55110	MM172935		13/05/2022
N211_302_20_01	LAP55075	WK527653		13/05/2022
N211_302_20_01	LAP55108			13/05/2022
N211_302_20_01	LAP55107			13/05/2022
N211_302_20_01	LAP55106			13/05/2022
N211_302_20_01	LAP55104			13/05/2022
N211_302_20_01	LAP55105			13/05/2022
N211_302_20_01	LAP55079			13/05/2022
N211_302_20_01	LAP55510			13/05/2022
N211_302_20_01	LAP55084			13/05/2022
N211_304_01	LAP55180	MM172171	825	21/04/2022
N211_304_01	LAP55179			21/04/2022
N211_304_01	LAP55178			21/04/2022
N211_304_01	LAP55177			21/04/2022
N211_304_01	LAP55176			21/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N211_308_20_01	LAP55390	WK527965	907	09/05/2022
N211_308_20_01	LAP55389	WK527968		09/05/2022
N211_308_20_01	LAP55474	WK529296		09/05/2022
N211_308_20_01	LAP55598			09/05/2022
N211_308_20_01	LAP55595			09/05/2022
N211_308_20_01	LAP55593			09/05/2022
N211_308_20_01	LAP55469			09/05/2022
N211_308_20_01	LAP55594			09/05/2022
N211_308_20_01	LAP55974			09/05/2022
N211_308_20_01	LAP55973			09/05/2022
N211_308_20_01	LAP55472			09/05/2022
N211_308_20_01	LAP55308			09/05/2022
N211_308_20_01	LAP55307			09/05/2022
N211_308_20_01	LAP55468			09/05/2022
N211_308_20_01	LAP55476			09/05/2022
N211_308_20_01	LAP55473			09/05/2022
N211_308_20_01	LAP55471			09/05/2022
N211_308_20_01	LAP55477			09/05/2022
N211_312_01	LAP55331	WK525674	783	14/03/2022
N211_312_01	LAP55470			14/03/2022
N211_313_20_01	LAP55321	MM173144	850	22/04/2022
N211_313_20_01	LAP55325	MM173181		22/04/2022
N211_313_20_01	LAP55323	WK529355		22/04/2022
N211_313_20_01	LAP55324			22/04/2022
N211_313_20_01	LAP55424			22/04/2022
N211_313_20_01	LAP55425			22/04/2022
N211_313_20_01	LAP55428			22/04/2022
N211_313_20_01	LAP55427			22/04/2022
N211_313_20_01	LAP55429			22/04/2022
N211_313_20_01	LAP55430			22/04/2022
N211_313_20_01	LAP55579			22/04/2022
N211_313_20_01	LAP55455			22/04/2022
N211_313_20_01	LAP55453			22/04/2022
N211_313_20_01	LAP55456			22/04/2022
N211_313_20_01	LAP55426			22/04/2022
N211_313_20_01	LAP55452			22/04/2022
N211_318_20_01	LAP56096		866	03/05/2022
N221_048_03	LAP27997	WK514167	352	21/04/2020
N221_048_03	LAP27993	WK514169		21/04/2020
N221_048_03	LAP27991	WK514170		21/04/2020
N221_048_03	LAP27992	WK514195		21/04/2020
N221_048_03	LAP27994			21/04/2020
N221_048_03	LAP27996			21/04/2020
N221_048_03	LAP27998			21/04/2020
N221_048_03	LAP50463			21/04/2020
N221_048_03	LAP28003			21/04/2020
N221_048_30_01	LAP50160	WK519328	463	28/04/2021
N221_048_31_01	LAP53715	WK519156	471	12/05/2021
N221_048_31_01	LAP53593			12/05/2021
N221_048_31_01	LAP53594			12/05/2021
N221_048_31_01	LAP53595			12/05/2021

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N221_048_50_01	LAP09342	WK527512	669	20/02/2022
N221_048_50_01	LAP09478			20/02/2022
N221_048_50_01	LAP09083			20/02/2022
N221_048_50_01	LAP09341			20/02/2022
N221_048_50_01	LAP09082			20/02/2022
N221_048_50_01	LAP09081			20/02/2022
N221_048_51_01	LAP09086	WK527066	845	18/04/2022
N221_048_51_01	LAP09085			18/04/2022
N221_050_01	LAP29190	WK347420 (C)	291	14/02/2020
N221_050_01	LAP29191	WK361896 (C)		14/02/2020
N221_050_01	LAP29207	WK512764		14/02/2020
N221_050_01	LAP29348	WK512774		14/02/2020
N221_050_01	LAP29208	WK512775		14/02/2020
N221_050_01	LAP29343	WK512777		14/02/2020
N221_050_01	LAP29344	WK512779		14/02/2020
N221_050_01	LAP29345	WK513660		14/02/2020
N221_050_01	LAP29346			14/02/2020
N221_050_01	LAP29337			14/02/2020
N221_050_01	LAP29338			14/02/2020
N221_050_01	LAP29339			14/02/2020
N221_050_01	LAP29357			14/02/2020
N221_050_01	LAP29340			14/02/2020
N221_050_01	LAP29341			14/02/2020
N221_050_01	LAP29342			14/02/2020
N221_050_01	LAP29349			14/02/2020
N221_050_01	LAP29353			14/02/2020
N221_050_01	LAP29354			14/02/2020
N221_050_01	LAP29355			14/02/2020
N221_050_01	LAP29356			14/02/2020
N221_050_01	LAP29188			14/02/2020
N221_050_01	LAP29189			14/02/2020
N221_050_01	LAP29336			14/02/2020
N221_050_30_01	LAP54963	WK526116	716	15/03/2022
N221_050_30_01	LAP54964			15/03/2022
N221_050_31_01	LAP56098	WK528731	885	15/05/2022
N221_050_31_01	LAP56101			15/05/2022
N221_050_31_01	LAP56099			15/05/2022
N221_050_31_01	LAP56100			15/05/2022
N221_050_31_01	LAP56103			15/05/2022
N221_050_31_01	LAP56104			15/05/2022
N221_050_31_01	LAP56105			15/05/2022
N221_050_31_01	LAP56102			15/05/2022
N221_050_50_01	LAP08469	WK522682	519	26/09/2021

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N221_051_01	LAP29747	WK513438	313	04/03/2020
N221_051_01	LAP29450	WK513599		04/03/2020
N221_051_01	LAP29451			04/03/2020
N221_051_01	LAP29456			04/03/2020
N221_051_01	LAP29457			04/03/2020
N221_051_01	LAP29458			04/03/2020
N221_051_01	LAP29459			04/03/2020
N221_051_01	LAP29461			04/03/2020
N221_051_01	LAP29462			04/03/2020
N221_051_01	LAP29464			04/03/2020
N221_051_01	LAP29469			04/03/2020
N221_051_30_01	LAP54975	WK527400	599	30/01/2022
N221_051_30_01	LAP54978	WK527411		30/01/2022
N221_051_30_01	LAP54977			30/01/2022
N221_051_30_01	LAP54976			30/01/2022
N221_051_30_01	LAP54980			30/01/2022
N221_051_30_01	LAP54979			30/01/2022
N221_051_30_01	LAP54984			30/01/2022
N221_051_50_01	LAP07599	WK526261	593	26/01/2022
N221_051_50_01	LAP07600			26/01/2022
N221_051_50_01	LAP07598			26/01/2022
N221_052_01	LAP29670	WK512639	331	22/04/2020
N221_052_01	LAP29681	WK513054		22/04/2020
N221_052_01	LAP29668	WK513055		22/04/2020
N221_052_01	LAP50956			22/04/2020
N221_052_01	LAP29671			22/04/2020
N221_052_01	LAP29672			22/04/2020
N221_052_30_01	LAP52494	WK512639 WK519425	478	21/05/2021
N221_052_50_01	LAP06191	WK521703	506	29/08/2021
N221_052_50_01	LAP06190	WK521706		29/08/2021
N221_053_20_01	LAP29550	WK519648	480	04/06/2021
N221_054_01	LAP29532	WK513424	347	12/05/2020
N221_054_01	LAP29530			12/05/2020
N221_054_01	LAP29529			12/05/2020
N221_054_50_01	LAP07879	WK524536	571	26/12/2021
N221_069_01	LAP51736	WK519009	425	20/11/2020
N221_069_01	LAP51733			20/11/2020
N221_069_01	LAP51734			20/11/2020
N221_069_01	LAP51735			20/11/2020
N221_069_01	LAP51732			20/11/2020
N221_069_30_01	LAP54962	WK523833	601	30/01/2022
N221_075_01	LAP52360	WK519542	472	04/06/2021
N221_082_01	LAP53614		633	12/02/2022
N221_090_20_01	LAP54288	WK527227	810	13/04/2022
N221_090_20_01	LAP55186			13/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N221_092_20_01	LAP54636	WK447069	904	15/05/2022
N221_092_20_01	LAP54887	WK512873		15/05/2022
N221_092_20_01	LAP54885	WK528169		15/05/2022
N221_092_20_01	LAP54879	WK528174		15/05/2022
N221_092_20_01	LAP54881	WK528184		15/05/2022
N221_092_20_01	LAP54883	WK528186		15/05/2022
N221_092_20_01	LAP54880	WK528187		15/05/2022
N221_092_20_01	LAP54634	WK528192		15/05/2022
N221_092_20_01	LAP54647	WK528751		15/05/2022
N221_092_20_01	LAP54768	WK525558		15/05/2022
N221_092_20_01	LAP54638			15/05/2022
N221_092_20_01	LAP54649			15/05/2022
N221_092_20_01	LAP56048			15/05/2022
N221_092_20_01	LAP56046			15/05/2022
N221_092_20_01	LAP54648			15/05/2022
N221_092_20_01	LAP55817			15/05/2022
N221_092_20_01	LAP54644			15/05/2022
N221_092_20_01	LAP55275			15/05/2022
N221_092_20_01	LAP54637			15/05/2022
N221_092_20_01	LAP54889			15/05/2022
N221_092_20_01	LAP54642			15/05/2022
N221_092_20_01	LAP54641			15/05/2022
N221_092_20_01	LAP54888			15/05/2022
N221_092_20_01	LAP54884			15/05/2022
N221_092_20_01	LAP54640			15/05/2022
N221_092_20_01	LAP54588			15/05/2022
N221_092_20_01	LAP55378		15/05/2022	
N221_093_01	LAP54628	WK526910	634	09/02/2022
N221_093_01	LAP54627			09/02/2022
N221_093_01	LAP54629			09/02/2022
N221_093_01	LAP54631			09/02/2022
N221_093_01	LAP54630			09/02/2022
N221_096_01	LAP55513		816	18/04/2022
N221_096_01	LAP54866			18/04/2022
N221_096_01	LAP54864			18/04/2022
N221_096_01	LAP54865			18/04/2022
N221_096_01	LAP54868			18/04/2022
N221_096_01	LAP55840			18/04/2022
N221_096_01	LAP55835			18/04/2022
N221_096_01	LAP54859			18/04/2022
N221_096_01	LAP54858			18/04/2022

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N221_097_20_01	LAP55490	WK527995	865	29/04/2022
N221_097_20_01	LAP55583	WK528007		29/04/2022
N221_097_20_01	LAP55584			29/04/2022
N221_097_20_01	LAP54769			29/04/2022
N221_097_20_01	LAP55883			29/04/2022
N221_097_20_01	LAP55582			29/04/2022
N221_097_20_01	LAP56095			29/04/2022
N221_097_20_01	LAP56135			29/04/2022
N221_097_20_01	LAP56094			29/04/2022
N221_097_20_01	LAP56139			29/04/2022
N221_097_20_01	LAP54772			29/04/2022
N221_097_20_01	LAP54774			29/04/2022
N221_097_20_01	LAP54773			29/04/2022
N221_097_20_01	LAP54771			29/04/2022
N221_097_20_01	LAP54770			29/04/2022
N221_097_20_01	LAP56136			29/04/2022
N221_097_20_01	LAP55496			29/04/2022
N221_097_20_01	LAP55495			29/04/2022
N221_097_20_01	LAP55494			29/04/2022
N221_097_20_01	LAP55493			29/04/2022
N221_097_20_01	LAP55491			29/04/2022
N221_098_01	LAP55287	WK529261	656	02/03/2022
N221_098_01	LAP55286	WK529277		02/03/2022
N221_098_01	LAP54923	WK529278		02/03/2022
N221_098_01	LAP55291	WK529279		02/03/2022
N221_098_01	LAP55290			02/03/2022
N221_098_01	LAP55289			02/03/2022
N221_098_01	LAP54961			02/03/2022
N221_098_01	LAP54925			02/03/2022
N221_098_01	LAP54924			02/03/2022
N221_098_01	LAP55288			02/03/2022
N221_098_01	LAP55292			02/03/2022
N222_038_01	LAP28643	WK512534	302	24/03/2020
N222_038_01	LAP28633	WK512199		24/03/2020
N222_038_01	LAP28651			24/03/2020
N222_038_01	LAP28644			24/03/2020
N222_038_01	LAP28632			24/03/2020
N222_038_01	LAP50256			24/03/2020
N222_038_01	LAP28631			24/03/2020
N222_038_50_01	LAP05872	WK524695	535	09/02/2022
N222_038_50_01	LAP05871			09/02/2022
N222_038_52_01	LAP08490	WK521910	518	26/09/2021
N222_038_52_01	LAP08489			26/09/2021
N222_058_01	LAP51387	WK514423	381	29/05/2020
N222_058_01	LAP28048	WK514492		29/05/2020
N222_058_01	LAP28047			29/05/2020
N222_058_01	LAP28046			29/05/2020
N222_058_01	LAP29275			29/05/2020
N222_058_01	LAP29274			29/05/2020
N222_058_50_01	LAP06061	WK524968	660	03/03/2022
N222_058_50_01	LAP06062			03/03/2022
N222_058_50_01	LAP06059			03/03/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N222_064_01	LAP29430	SF660535	342	30/04/2020
N222_064_01	LAP29431			30/04/2020
N222_064_01	LAP29432			30/04/2020
N222_064_01	LAP29433			30/04/2020
N222_064_01	LAP50502			30/04/2020
N222_064_01	LAP29426			30/04/2020
N222_064_01	LAP29427			30/04/2020
N222_064_50_01	LAP09041		668	07/03/2022
N222_064_50_01	LAP09040			07/03/2022
N222_064_50_01	LAP09038			07/03/2022
N222_065_01	LAP29304	SF658113	308	11/03/2020
N222_066_01	LAP29523	SF659032	306	04/03/2020
N222_066_01	LAP29522	SF659132		04/03/2020
N222_066_01	LAP29521			04/03/2020
N222_066_01	LAP29715			04/03/2020
N222_066_50_01	LAP09047	SF680490	741	15/03/2022
N222_066_50_01	LAP09045	SF684911		15/03/2022
N222_066_50_01	LAP09044			15/03/2022
N222_066_50_01	LAP09042			15/03/2022
N222_067_01	LAP29396	SF541468(c)	294	04/03/2020
N222_067_01	LAP29397	SF658093		04/03/2020
N222_067_01	LAP29384			04/03/2020
N222_067_01	LAP29382			04/03/2020
N222_067_01	LAP29383			04/03/2020
N222_067_50_01	LAP09050	SF677157	612	27/01/2022
N222_068_01	LAP29402	SF405062	373	15/05/2020
N222_068_01	LAP29405	SF661269		15/05/2020
N222_068_01	LAP29399	SF661302		15/05/2020
N222_068_01	LAP29401			15/05/2020
N222_068_01	LAP29398			15/05/2020
N222_068_01	LAP29404			15/05/2020
N222_068_50_01	LAP09037	SF678136	667	23/02/2022
N222_068_50_01	LAP09036			23/02/2022
N222_069_01	LAP29380	SF658073	301	04/03/2020
N222_069_01	LAP50733			04/03/2020
N222_069_01	LAP29381			04/03/2020
N222_069_50_01	LAP05923	SF674755	547	05/12/2021
N222_070_01	LAP29334		332	29/04/2020
N222_070_01	LAP29327			29/04/2020
N222_070_01	LAP29326			29/04/2020
N222_070_01	LAP29328			29/04/2020
N222_070_01	LAP29324			29/04/2020
N222_070_01	LAP29329			29/04/2020
N222_070_01	LAP29330			29/04/2020
N222_070_01	LAP29325			29/04/2020
N222_070_01	LAP29332			29/04/2020
N222_070_01	LAP29331			29/04/2020
N222_070_01	LAP29333			29/04/2020
N222_071_01	LAP29517	WK512891	369	11/05/2020
N222_071_01	LAP29519			11/05/2020
N222_071_50_01	LAP06053	WK527795	844	18/04/2022
N222_071_50_01	LAP06052			18/04/2022
N222_071_50_01	LAP06049			18/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N222_072_01	LAP50216	WK401937 (c)	368	12/05/2020
N222_072_01	LAP50219	WK512749		12/05/2020
N222_072_01	LAP50220	WK512783		12/05/2020
N222_072_01	LAP50098			12/05/2020
N222_072_01	LAP50222			12/05/2020
N222_072_01	LAP50221			12/05/2020
N222_072_01	LAP50102			12/05/2020
N222_072_01	LAP50213			12/05/2020
N222_072_01	LAP50215			12/05/2020
N222_072_50_01	LAP06030	WK524156	565	24/12/2021
N222_073_01	LAP50478	WK513210	333	30/04/2020
N222_073_01	LAP50471	WK513462		30/04/2020
N222_073_01	LAP50479	WK514380		30/04/2020
N222_073_01	LAP50477			30/04/2020
N222_073_01	LAP50476			30/04/2020
N222_073_01	LAP50480			30/04/2020
N222_073_01	LAP50474			30/04/2020
N222_073_01	LAP50472			30/04/2020
N222_074_01	LAP29848		309	11/03/2020
N222_074_01	LAP29849			11/03/2020
N222_075_01	LAP29829	WK512734	316	07/05/2020
N222_075_01	LAP29718			07/05/2020
N222_075_01	LAP29717			07/05/2020
N222_101_21	LAP53241	WK521799	505	22/09/2021
N222_101_21	LAP53246	WK522147		22/09/2021
N222_101_21	LAP53245			22/09/2021
N222_101_21	LAP53244			22/09/2021
N222_101_21	LAP53243			22/09/2021
N222_101_21	LAP53242			22/09/2021
N222_109_20_01	LAP56130	SF680500	859	19/04/2022
N222_109_20_01	LAP55827	WK527785		19/04/2022
N222_109_20_01	LAP55778			19/04/2022
N222_109_20_01	LAP55777			19/04/2022
N222_109_20_01	LAP53869			19/04/2022
N222_109_20_01	LAP56131			19/04/2022
N222_109_20_01	LAP53868			19/04/2022
N222_109_20_01	LAP53864			19/04/2022
N222_109_20_01	LAP53862			19/04/2022
N222_109_20_01	LAP53863			19/04/2022
N222_111_01	LAP55601	SF684556		696
N222_111_01	LAP55600		23/02/2022	
N222_111_01	LAP55661		23/02/2022	
N222_115_20_01	LAP55656	WK531258	681	23/02/2022
N222_115_20_01	LAP55657			23/02/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N223_040_01	LAP29280	SF661145	337	13/05/2020
N223_040_01	LAP27734	SF661152		13/05/2020
N223_040_01	LAP50614	SF661154		13/05/2020
N223_040_01	LAP27741	SF661155		13/05/2020
N223_040_01	LAP29284	SF661156		13/05/2020
N223_040_01	LAP29285	SF672759		13/05/2020
N223_040_01	LAP50612			13/05/2020
N223_040_01	LAP29279			13/05/2020
N223_040_01	LAP27746			13/05/2020
N223_040_01	LAP27745			13/05/2020
N223_040_01	LAP29278			13/05/2020
N223_040_01	LAP27744			13/05/2020
N223_040_01	LAP27743			13/05/2020
N223_040_01	LAP27742			13/05/2020
N223_040_01	LAP29281			13/05/2020
N223_040_01	LAP29283			13/05/2020
N223_040_01	LAP27740			13/05/2020
N223_040_01	LAP27736			13/05/2020
N223_071_01	LAP54852	SF685916		698
N223_071_01	LAP54853	SF685917	17/03/2022	
N223_071_01	LAP54846	SF686372	17/03/2022	
N223_071_01	LAP54990		17/03/2022	
N223_071_01	LAP54985		17/03/2022	
N223_071_01	LAP54987		17/03/2022	
N223_071_01	LAP54988		17/03/2022	
N223_071_01	LAP54989		17/03/2022	
N223_073_20_01	LAP55508	SF681463	834	11/05/2022
N223_073_20_01	LAP55506	SF681465		11/05/2022
N223_073_20_01	LAP55839			11/05/2022
N223_073_20_01	LAP55505			11/05/2022
N223_073_20_01	LAP55276			11/05/2022
N223_073_20_01	LAP55277			11/05/2022
N223_073_20_01	LAP55278			11/05/2022
N223_073_20_01	LAP55875			11/05/2022
N231_034_01	LAP27000	SF659076	304	05/03/2020
N231_034_01	LAP27454	SF659082		05/03/2020
N231_034_01	LAP26992			05/03/2020
N231_034_01	LAP26994			05/03/2020
N231_034_01	LAP26995			05/03/2020
N231_034_01	LAP26998			05/03/2020
N231_034_01	LAP27451			05/03/2020
N231_034_01	LAP27452			05/03/2020
N231_034_01	LAP26990			05/03/2020
N231_034_01	LAP27001			05/03/2020
N231_034_50_01	LAP05931	SF672824	528	25/10/2021
N231_034_50_01	LAP06171			25/10/2021
N231_034_50_01	LAP09482			25/10/2021
N231_034_50_01	LAP09480			25/10/2021
N231_034_50_01	LAP09481			25/10/2021

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N231_042_03	LAP29215	SF664665	358	23/04/2020
N231_042_03	LAP29216	SF659371		23/04/2020
N231_042_03	LAP27783			23/04/2020
N231_042_03	LAP27784			23/04/2020
N231_042_03	LAP27786			23/04/2020
N231_042_03	LAP27789			23/04/2020
N231_042_03	LAP27787			23/04/2020
N231_042_03	LAP27788			23/04/2020
N231_042_03	LAP27791			23/04/2020
N231_042_03	LAP27792			23/04/2020
N231_042_03	LAP29217			23/04/2020
N231_042_03	LAP29242			23/04/2020
N231_042_03	LAP29233			23/04/2020
N231_042_03	LAP27790			23/04/2020
N231_042_03	LAP29240			23/04/2020
N231_042_03	LAP27793			23/04/2020
N231_042_03	LAP27795			23/04/2020
N231_042_03	LAP27796			23/04/2020
N231_042_03	LAP29232			23/04/2020
N231_042_50_01	LAP05939	SF685604	843	19/04/2022
N231_042_50_01	LAP05940			19/04/2022
N231_045_01	LAP27804	SF659244	388	28/05/2020
N231_045_01	LAP27805			28/05/2020
N231_045_01	LAP27815			28/05/2020
N231_045_01	LAP27810			28/05/2020
N231_045_01	LAP27809			28/05/2020
N231_045_01	LAP27808			28/05/2020
N231_045_01	LAP27811			28/05/2020
N231_045_01	LAP27801			28/05/2020
N231_045_01	LAP27807			28/05/2020
N231_045_01	LAP27806			28/05/2020
N231_045_01	LAP27800			28/05/2020
N231_045_01	LAP27802			28/05/2020
N231_045_01	LAP27812			28/05/2020
N231_045_01	LAP27799			28/05/2020
N231_045_01	LAP29171			28/05/2020
N231_045_01	LAP27814			28/05/2020
N231_045_01	LAP29176			28/05/2020
N231_045_01	LAP29172			28/05/2020
N231_045_01	LAP27803			28/05/2020
N231_045_01	LAP29173			28/05/2020
N231_045_01	LAP29174			28/05/2020
N231_045_01	LAP29175			28/05/2020
N231_045_01	LAP29177			28/05/2020
N231_045_01	LAP28383			28/05/2020

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N231_045_50_01	LAP30120	SF680324	721	15/03/2022
N231_045_50_01	LAP30112			15/03/2022
N231_045_50_01	LAP30113			15/03/2022
N231_045_50_01	LAP30111			15/03/2022
N231_045_50_01	LAP09572			15/03/2022
N231_045_50_01	LAP09570			15/03/2022
N231_045_50_01	LAP09567			15/03/2022
N231_045_50_01	LAP30119			15/03/2022
N231_045_50_01	LAP30123			15/03/2022
N231_045_50_01	LAP30115			15/03/2022
N231_045_50_01	LAP30117			15/03/2022
N231_045_50_01	LAP30122			15/03/2022
N231_045_50_01	LAP06306			15/03/2022
N231_045_50_01	LAP09568			15/03/2022
N231_045_50_01	LAP09571			15/03/2022
N231_050_03	LAP29421	SF658793	359	17/04/2020
N231_050_03	LAP29420	SF659715		17/04/2020
N231_050_03	LAP29418			17/04/2020
N231_050_03	LAP29417			17/04/2020
N231_050_03	LAP29416			17/04/2020
N231_050_03	LAP29414			17/04/2020
N231_050_03	LAP29412			17/04/2020
N231_050_03	LAP29407			17/04/2020
N231_050_03	LAP29406			17/04/2020
N231_050_03	LAP29425			17/04/2020
N231_050_03	LAP29424			17/04/2020
N231_050_03	LAP29415			17/04/2020
N231_050_03	LAP29423			17/04/2020
N231_050_03	LAP29422			17/04/2020
N231_050_03	LAP29419			17/04/2020
N231_051_01	LAP29434	SF659553	382	27/05/2020
N231_051_01	LAP29435			27/05/2020
N231_051_01	LAP29438			27/05/2020
N231_051_01	LAP29436			27/05/2020
N231_051_01	LAP29440			27/05/2020
N231_051_01	LAP29439			27/05/2020
N231_051_01	LAP29373			27/05/2020
N231_051_01	LAP29437			27/05/2020
N231_051_01	LAP29374			27/05/2020
N231_051_01	LAP29375			27/05/2020
N231_053_01	LAP50633	SF659099	387	28/05/2020
N231_053_01	LAP50634	SF659221		28/05/2020
N231_053_01	LAP50635			28/05/2020
N231_053_01	LAP50637			28/05/2020
N231_053_01	LAP50632			28/05/2020
N231_053_01	LAP50710			28/05/2020
N231_053_01	LAP50709			28/05/2020
N231_053_01	LAP50631			28/05/2020
N231_053_01	LAP50636			28/05/2020
N231_054_01	LAP50589	SF662049	377	19/05/2020
N231_054_01	LAP50560			19/05/2020
N231_054_30_01	LAP55663	WK675955	608	27/01/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N231_055_01	LAP29211	SF658723	219	13/02/2020
N231_055_01	LAP29213			13/02/2020
N231_055_01	LAP29212			13/02/2020
N231_055_30_01	LAP55706	SF678123	649	02/03/2022
N231_055_30_01	LAP55705			02/03/2022
N231_056_01	LAP55516	SF680352	705	23/04/2022
N231_056_01	LAP29665	SF680415		23/04/2022
N231_056_01	LAP29667			23/04/2022
N231_060_01	LAP54137	SF673254	516	27/10/2021
N231_060_01	LAP27785			27/10/2021
N231_072_01	LAP55313	SF684541	856	19/04/2022
N231_072_01	LAP55315	SF684547		19/04/2022
N231_072_01	LAP55314			19/04/2022
N231_072_01	LAP55312			19/04/2022
N231_072_01	LAP55311			19/04/2022
N231_073_01	LAP55404		786	24/03/2022
N231_073_01	LAP55957			24/03/2022
N231_073_01	LAP55958			24/03/2022
N231_075_20_01	LAP55440	SF677499	764	22/03/2022
N231_075_20_01	LAP55565	SF677500		22/03/2022
N231_075_20_01	LAP55573			22/03/2022
N232_022_01	LAP27630	SF652622	130	16/06/2019
N232_022_01	LAP27299			16/06/2019
N232_022_01	LAP27279			16/06/2019
N232_022_01	LAP27278			16/06/2019
N232_022_01	LAP26593			16/06/2019
N232_022_50_01	LAP06246	SF680250	693	23/03/2022
N232_022_50_01	LAP06247			23/03/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N232_029_01	LAP27947	SF660563	383	27/05/2020
N232_029_01	LAP28069	SF660568		27/05/2020
N232_029_01	LAP28059	SF660571		27/05/2020
N232_029_01	LAP28058	SF660577		27/05/2020
N232_029_01	LAP28057	SF660581		27/05/2020
N232_029_01	LAP28064	SF660583		27/05/2020
N232_029_01	LAP28063	SF660744		27/05/2020
N232_029_01	LAP28062	SF672704		27/05/2020
N232_029_01	LAP29165	SF674081		27/05/2020
N232_029_01	LAP29179			27/05/2020
N232_029_01	LAP27948			27/05/2020
N232_029_01	LAP27949			27/05/2020
N232_029_01	LAP27950			27/05/2020
N232_029_01	LAP27955			27/05/2020
N232_029_01	LAP28307			27/05/2020
N232_029_01	LAP27938			27/05/2020
N232_029_01	LAP27939			27/05/2020
N232_029_01	LAP27940			27/05/2020
N232_029_01	LAP27951			27/05/2020
N232_029_01	LAP28572			27/05/2020
N232_029_01	LAP28363			27/05/2020
N232_029_01	LAP27952			27/05/2020
N232_029_01	LAP27956			27/05/2020
N232_029_01	LAP27959			27/05/2020
N232_029_01	LAP27960			27/05/2020
N232_029_01	LAP27954			27/05/2020
N232_029_01	LAP27937			27/05/2020
N232_029_01	LAP28304		27/05/2020	
N232_029_01	LAP28306		27/05/2020	
N232_029_01	LAP28305		27/05/2020	
N232_029_30_01	LAP55005	SF672957	530	03/11/2021

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LAOID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N232_029_31_02	LAP55979		919	19/05/2022
N232_029_31_02	LAP56059			19/05/2022
N232_029_31_02	LAP56025			19/05/2022
N232_029_31_02	LAP55793			19/05/2022
N232_029_31_02	LAP55792			19/05/2022
N232_029_31_02	LAP55790			19/05/2022
N232_029_31_02	LAP55789			19/05/2022
N232_029_31_02	LAP55788			19/05/2022
N232_029_31_02	LAP55787			19/05/2022
N232_029_31_02	LAP55991			19/05/2022
N232_029_31_02	LAP55995			19/05/2022
N232_029_31_02	LAP55987			19/05/2022
N232_029_31_02	LAP55999			19/05/2022
N232_029_31_02	LAP55990			19/05/2022
N232_029_31_02	LAP55992			19/05/2022
N232_029_31_02	LAP55996			19/05/2022
N232_029_31_02	LAP55998			19/05/2022
N232_029_31_02	LAP56004			19/05/2022
N232_029_31_02	LAP56005			19/05/2022
N232_029_31_02	LAP56006			19/05/2022
N232_029_31_02	LAP56007			19/05/2022
N232_029_31_02	LAP56003			19/05/2022
N232_029_31_02	LAP56002			19/05/2022
N232_029_31_02	LAP56013			19/05/2022
N232_029_31_02	LAP56008			19/05/2022
N232_029_31_02	LAP56010			19/05/2022
N232_029_31_02	LAP55988			19/05/2022
N232_029_31_02	LAP56011			19/05/2022
N232_029_31_02	LAP56012			19/05/2022
N232_029_31_02	LAP56015			19/05/2022
N232_029_50_01	LAP06205	SF672982	532	03/11/2021
N232_029_50_01	LAP06204			03/11/2021
N232_029_50_01	LAP06209			03/11/2021
N232_029_50_01	LAP06207			03/11/2021
N232_029_50_01	LAP09153			03/11/2021
N232_029_50_01	LAP06210			03/11/2021
N232_029_50_01	LAP06318			03/11/2021
N232_029_50_01	LAP06211			03/11/2021
N232_029_50_01	LAP06206			03/11/2021
N232_029_50_01	LAP06208			03/11/2021
N232_030_01	LAP50129	SF658103	310	05/03/2020
N232_031_01	LAP50158	SF658700	311	05/03/2020
N232_031_01	LAP50155	SF658701		05/03/2020
N232_031_01	LAP50030			05/03/2020
N232_031_01	LAP50031			05/03/2020
N232_031_50_01	LAP06309	SF673700	531	01/11/2021
N232_031_50_01	LAP06307			01/11/2021
N232_031_50_01	LAP06308			01/11/2021
N232_031_51_01	LAP06495	SF675544	557	24/12/2021
N232_032_03	LAP29879	SF658699	350	17/04/2020
N232_032_30_01	LAP55758	SF678091	671	02/03/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N232_034_01	LAP50065	SF663014	426	19/11/2020
N232_034_01	LAP50067			19/11/2020
N232_034_01	LAP50068			19/11/2020
N232_034_50_01	LAP06500	SF674593	566	22/12/2021
N232_034_50_01	LAP06499			22/12/2021
N232_035_20_01	LAP55393	SF677468	699	25/02/2022
N232_047_01	LAP55603	SF683259	916	15/05/2022
N232_047_01	LAP54743	SF683277		15/05/2022
N232_047_01	LAP54744			15/05/2022
N232_047_01	LAP54857			15/05/2022
N232_047_01	LAP55602			15/05/2022
N232_501_40_01	LAP06334	SF680929	890	17/05/2022
N232_501_40_01	LAP06338			17/05/2022
N233_067_01	LAP29151	SF660701	380	18/06/2020
N233_067_01	LAP29363	SF660767		18/06/2020
N233_067_01	LAP29157	SF661226		18/06/2020
N233_067_01	LAP29148	SF660764		18/06/2020
N233_067_01	LAP29149	SF660758		18/06/2020
N233_067_01	LAP29153	SF660765(L) C		18/06/2020
N233_067_01	LAP27913			18/06/2020
N233_067_01	LAP50369			18/06/2020
N233_067_01	LAP50371			18/06/2020
N233_067_01	LAP29152			18/06/2020
N233_067_01	LAP29161			18/06/2020
N233_067_01	LAP27924			18/06/2020
N233_067_01	LAP29182			18/06/2020
N233_067_01	LAP27923			18/06/2020
N233_067_01	LAP29183			18/06/2020
N233_067_01	LAP27922			18/06/2020
N233_067_01	LAP29162			18/06/2020
N233_067_01	LAP29160			18/06/2020
N233_067_01	LAP29154			18/06/2020
N233_067_01	LAP29156			18/06/2020
N233_067_01	LAP29159			18/06/2020
N233_067_01	LAP29158			18/06/2020
N233_067_01	LAP27926			18/06/2020
N233_067_01	LAP27925			18/06/2020
N233_067_01	LAP50780			18/06/2020
N233_067_50_01	LAP07025	SF678048	714	18/03/2022
N233_067_50_01	LAP07027	SF678102		18/03/2022
N233_067_50_01	LAP07028	SF678968		18/03/2022
N233_067_50_01	LAP07026			18/03/2022
N233_067_50_01	LAP07035			18/03/2022
N233_067_50_01	LAP07034			18/03/2022
N233_067_50_01	LAP07033			18/03/2022
N233_067_50_01	LAP07032			18/03/2022
N233_067_50_01	LAP07031			18/03/2022
N233_067_50_01	LAP07030			18/03/2022
N233_067_50_01	LAP07029			18/03/2022
N233_068_01	LAP50119	SF660668 SF660687	312	04/06/2020

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N233_068_50_01	LAP09936	SF682791	663	03/03/2022
N233_068_50_01	LAP09934			03/03/2022
N233_068_50_01	LAP09932			03/03/2022
N233_068_50_01	LAP09933			03/03/2022
N233_068_50_01	LAP09935			03/03/2022
N233_069_01	LAP50346	SF666202	449	02/03/2021
N233_069_01	LAP29619	SF666314		02/03/2021
N233_069_01	LAP29616			02/03/2021
N233_069_01	LAP29618			02/03/2021
N233_069_01	LAP50347			02/03/2021
N233_069_01	LAP29617			02/03/2021
N233_069_01	LAP50350			02/03/2021
N233_069_01	LAP51761			02/03/2021
N233_069_01	LAP29642			02/03/2021
N233_069_01	LAP29615			02/03/2021
N233_069_01	LAP29613			02/03/2021
N233_069_01	LAP29611			02/03/2021
N233_069_01	LAP29612			02/03/2021
N233_069_03	LAP50348	SF667456		459
N233_069_03	LAP52649		22/04/2021	
N233_070_01	LAP29570	SF658263	314	04/03/2020
N233_070_50_01	LAP09957	SF676582	662	02/03/2022
N233_071_03	LAP50150	SF658756	362	21/04/2020
N233_071_03	LAP50149	SF659211		21/04/2020
N233_071_03	LAP50154			21/04/2020
N233_071_03	LAP50152			21/04/2020
N233_071_03	LAP50151			21/04/2020
N233_071_03	LAP50148			21/04/2020
N233_071_03	LAP50777			21/04/2020
N233_071_03	LAP50153			21/04/2020
N233_071_50_01	LAP06698	SF677642	759	18/03/2022
N233_071_50_01	LAP06699	SF677647		18/03/2022
N233_071_50_01	LAP06700	SF677648		18/03/2022
N233_071_50_01	LAP09962			18/03/2022
N233_072_01	LAP29876	SF667507	398	17/09/2020
N233_072_01	LAP29868	SF667703		17/09/2020
N233_072_01	LAP29865	SF667706		17/09/2020
N233_072_01	LAP29873	SF667707		17/09/2020
N233_072_01	LAP29877			17/09/2020
N233_072_01	LAP50255			17/09/2020
N233_072_01	LAP29866			17/09/2020
N233_072_01	LAP29870			17/09/2020
N233_072_01	LAP29875			17/09/2020
N233_072_50_01	LAP09941	SF677538		758
N233_072_50_01	LAP07432		18/03/2022	
N233_072_50_01	LAP07430		18/03/2022	
N233_072_50_01	LAP07431		18/03/2022	
N233_072_50_01	LAP07433		18/03/2022	
N233_072_50_01	LAP07434		18/03/2022	
N233_072_50_01	LAP09940		18/03/2022	

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N233_073_01	LAP29897	SF575176	749	22/03/2022
N233_073_01	LAP29898	SF680249		22/03/2022
N233_073_01	LAP29899	SF680256		22/03/2022
N233_073_01	LAP29900			22/03/2022
N233_073_01	LAP29901			22/03/2022
N233_073_01	LAP29902			22/03/2022
N233_073_01	LAP29904			22/03/2022
N233_073_01	LAP29905			22/03/2022
N233_073_01	LAP29903			22/03/2022
N233_073_01	LAP50192			22/03/2022
N233_082_01	LAP51870	SF667354		451
N233_082_01	LAP51852	SF667420	24/02/2021	
N233_082_01	LAP51823		24/02/2021	
N233_111_01	LAP53827		2014	16/04/2022
N233_111_01	LAP53829			16/04/2022
N233_111_01	LAP53830			16/04/2022
N233_111_01	LAP53831			16/04/2022
N233_111_01	LAP53833			16/04/2022
N233_111_01	LAP53826			16/04/2022
N233_111_01	LAP53837			16/04/2022
N233_111_01	LAP53836			16/04/2022
N233_111_01	LAP53834			16/04/2022
N233_111_01	LAP53828			16/04/2022
N233_111_01	LAP53835			16/04/2022
N233_112_20_01	LAP54411	SF677977	690	01/03/2022
N233_112_20_01	LAP55364	SF677986		01/03/2022
N233_112_20_01	LAP55358			01/03/2022
N233_112_20_01	LAP55359			01/03/2022
N233_112_20_01	LAP54412			01/03/2022
N233_118_20_01	LAP55346		798	21/04/2022
N233_118_20_01	LAP55418			21/04/2022
N233_118_20_01	LAP55336			21/04/2022
N233_118_20_01	LAP55337			21/04/2022
N233_118_20_01	LAP55805			21/04/2022
N233_118_20_01	LAP55460			21/04/2022
N233_118_20_01	LAP54982			21/04/2022
N233_118_20_01	LAP54813			21/04/2022
N233_118_20_01	LAP55345			21/04/2022
N233_118_20_01	LAP55343			21/04/2022
N233_118_20_01	LAP55344			21/04/2022
N233_118_20_01	LAP55420			21/04/2022
N233_118_20_01	LAP55421			21/04/2022
N233_118_20_01	LAP55448			21/04/2022
N233_118_20_01	LAP55419			21/04/2022
N233_118_20_01	LAP55347			21/04/2022
N233_118_20_01	LAP55416			21/04/2022
N233_118_20_01	LAP55417			21/04/2022
N233_118_20_01	LAP55413			21/04/2022
N233_118_20_01	LAP55414			21/04/2022
N233_118_20_01	LAP55415			21/04/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N233_119_01	LAP55649		836	08/05/2022
N233_119_01	LAP55646			08/05/2022
N233_119_01	LAP55647			08/05/2022
N233_119_01	LAP55645			08/05/2022
N311_015_01	LAP25311	MM18781 WM535869(L)(C)	99	24/10/2018
N311_019_01	LAP28454	WM285274	194	25/09/2019
N311_019_30_01	LAP55580	MM170991	779	12/04/2022
N311_021_01	LAP29024	MM78359	251	05/12/2019
N311_021_01	LAP29025	MM140876		05/12/2019
N311_021_01	LAP29026	MM141382		05/12/2019
N311_021_01	LAP29027	MM141384		05/12/2019
N311_021_01	LAP29028	MM143173		05/12/2019
N311_021_01	LAP29030	MM143268		05/12/2019
N311_021_01	LAP29029	MM140876		05/12/2019
N311_021_01	LAP28856			05/12/2019
N311_021_01	LAP28850			05/12/2019
N311_021_01	LAP28851			05/12/2019
N311_021_01	LAP28853			05/12/2019
N311_021_01	LAP28855			05/12/2019
N311_021_01	LAP28857			05/12/2019
N311_021_01	LAP28978			05/12/2019
N311_021_01	LAP28979			05/12/2019
N311_021_01	LAP29019			05/12/2019
N311_021_01	LAP29020			05/12/2019
N311_021_01	LAP29021			05/12/2019
N311_021_01	LAP29022			05/12/2019
N311_021_01	LAP29023		05/12/2019	
N311_021_31_01	LAP54513	MM162170	517	14/10/2021
N311_021_31_01	LAP54514	MM162172		14/10/2021
N311_021_31_01	LAP54512	MM162281		14/10/2021
N311_021_31_01	LAP54416	MM162524		14/10/2021
N311_021_31_01	LAP54511	MM162552		14/10/2021
N311_021_31_01	LAP53360	MM162597		14/10/2021
N311_021_31_01	LAP53947			14/10/2021
N311_021_31_01	LAP53946			14/10/2021
N311_021_31_01	LAP53945			14/10/2021
N311_021_31_01	LAP54414			14/10/2021
N311_021_31_01	LAP54413			14/10/2021
N311_021_31_01	LAP54530			14/10/2021
N311_025_21	LAP51527	MM159422		489
N311_025_21	LAP51590	MM159425	11/08/2021	
N311_025_21	LAP51362	MM159432	11/08/2021	
N311_025_21	LAP51530	MM159572	11/08/2021	
N311_025_21	LAP51529		11/08/2021	
N311_025_21	LAP51363		11/08/2021	
N311_025_21	LAP51724		11/08/2021	
N311_025_21	LAP51723		11/08/2021	
N311_025_21	LAP51376		11/08/2021	
N311_025_21	LAP51591		11/08/2021	
N311_025_21	LAP51535		11/08/2021	
N311_025_21	LAP51534		11/08/2021	
N311_025_21	LAP51531		11/08/2021	

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N311_044_01	LAP55064	WK525475	695	23/02/2022
N311_054_20_01	LAP56197	MM173207	911	13/05/2022
N411_003_01	LAP24134	MM115445	63	04/04/2018
N411_003_01	LAP24106			04/04/2018
N411_003_01	LAP24600			04/04/2018
N411_003_01	LAP21389			04/04/2018
N411_003_01	LAP24135			04/04/2018
N411_003_01	LAP24104			04/04/2018
N411_003_01	LAP24133			04/04/2018
N411_003_01	LAP24137			04/04/2018
N411_003_01	LAP24136			04/04/2018
N411_003_01	LAP24132			04/04/2018
N411_003_01	LAP21388			04/04/2018
N411_003_01	LAP24138			04/04/2018
N411_003_01	LAP24105			04/04/2018
N411_003_35_01	LAP54409			MM166426
N411_019_01	LAP24266	MM119817	86	17/07/2018
N411_019_01	LAP24812	MM119818		17/07/2018
N411_019_01	LAP24811	MM119819(c)		17/07/2018
N411_019_01	LAP24267	MM119820		17/07/2018
N411_019_01	LAP24268	MM122933		17/07/2018
N411_019_01	LAP24265	WM972142(C)		17/07/2018
N411_019_02	LAP56347			926
N411_019_35	LAP56350		927	17/05/2022
N411_019_35	LAP56352			17/05/2022
N411_019_35	LAP56351			17/05/2022
N411_019_35	LAP56353			17/05/2022
N411_019_35	LAP56354			17/05/2022
N411_019_35	LAP56357			17/05/2022
N411_030_01	LAP25514	MM124367	92	30/08/2018
N411_030_01	LAP25309	WM898244 WM941121		30/08/2018
N411_030_32_01	LAP54302	MM166873	580	09/02/2022
N411_030_32_01	LAP54301			09/02/2022
N411_033_01	LAP26386	MM121322	111	23/01/2019
N411_033_01	LAP26364			23/01/2019
N411_033_01	LAP26365			23/01/2019
N411_033_01	LAP26366			23/01/2019
N411_033_01	LAP26367			23/01/2019
N411_035_01	LAP27132	MM123551	118	13/03/2019
N411_035_01	LAP27131			13/03/2019
N411_035_01	LAP27543			13/03/2019
N411_035_01	LAP27544			13/03/2019
N411_035_02	LAP27545	MM123551	139	17/07/2019
N411_035_02	LAP27544	MM131770		17/07/2019
N411_035_02	LAP27543			17/07/2019
N411_035_30_01	LAP54524	MM163816	554	09/12/2021
N411_035_30_01	LAP54527			09/12/2021
N411_035_31_01	LAP54510	MM166666	559	28/12/2021
N411_035_31_01	LAP54509			28/12/2021
N411_035_32_01	LAP55812	MM167417	560	30/12/2021
N411_035_32_01	LAP55813			30/12/2021
N411_035_32_01	LAP55814			30/12/2021

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
N411_038_01	LAP28928	WM985301	258	15/01/2020
N411_039_01	LAP29445	WK67270	418	28/10/2020
N411_039_01	LAP29447	WM851759		28/10/2020
N411_039_01	LAP29446			28/10/2020
N411_039_01	LAP29449			28/10/2020
N411_039_30_01	LAP54443	MM166183	553	09/12/2021
N411_039_30_01	LAP54444			09/12/2021
N411_039_30_01	LAP54445			09/12/2021
N411_039_30_01	LAP54442			09/12/2021
N411_040_01	LAP50356	MM141651	345	23/04/2020
N411_040_01	LAP29641			23/04/2020
N411_040_01	LAP50211			23/04/2020
N411_040_01	LAP50212			23/04/2020
N411_053_03	LAP50828	BM141672	349	16/04/2020
N411_053_30_01	LAP52035	MM155198	462	27/04/2021
N411_055_01	LAP51325	MM146044	400	30/09/2020
N411_055_01	LAP51327			30/09/2020
S111_007_01	LAP01408	NGL668208 NGL693997 NGL793700 NGL832693	59	29/05/2018
S111_007_02	LAP01408	NGL819573 NGL842628	60	30/05/2018
S111_007_03	LAP01407	NGL680106 NGL651987 NGL759649 NGL789043 NGL800540	61	07/06/2018
S111_007_04	LAP01407	NGL646907 NGL680931 NGL776764 NGL822570 NGL828528	62	31/05/2018
S111_007_05	LAP01409	NGL766968 NGL796929 NGL827802 NGL832944	65	13/06/2018
S111_007_06	LAP01409	NGL440281 NGL688352 NGL803547 NGL808309	67	04/06/2018
S111_007_07	LAP01407	NGL748756 NGL794855 NGL795468 NGL805259 NGL802611	64	14/06/2018
S111_007_08	LAP01409	NGL840968 NGL843292 NGL846195	68	15/06/2018

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
S111_007_09	LAP01410		292	14/02/2020
S111_007_09	LAP01510			14/02/2020
S111_007_09	LAP01511			14/02/2020
S111_007_09	LAP01379			14/02/2020
S111_007_09	LAP01407			14/02/2020
S111_007_09	LAP01408			14/02/2020
S111_007_09	LAP01409			14/02/2020
S111_007_09	LAP01527			14/02/2020
S111_007_09	LAP01378			14/02/2020
S111_007_09	LAP03122			14/02/2020
S111_018_01,S111_018_01	LAP00973,LAP01353	NGL981857 NGL934676(L) NGL785234(L) NGL332992(L) NGL336513(L) NGL342052(L) NGL362000(L) NGL381345(L) NGL456827(L) NGL543682(L) NGL739882(L)	25	27/02/2018,27/02/2018
S111_031_01	LAP02091	BB18117	600	02/03/2022
S111_035_01	LAP02609	BB1519	143	17/08/2019
S111_035_01	LAP02560			17/08/2019
S111_039_01	LAP03149	BB18579	655	18/02/2022
S111_061_01	LAP04305	BB14592	509	16/09/2021
S111_061_01	LAP04310	NGL810180		16/09/2021
S111_061_01	LAP04313			16/09/2021
S111_061_01	LAP04306			16/09/2021
S111_061_01	LAP04303			16/09/2021
S111_061_01	LAP04304			16/09/2021
S111_061_01	LAP04308			16/09/2021
S111_061_01	LAP04311			16/09/2021
S111_074_01	LAP30271	BB18795	708	02/03/2022
S111_077_01	LAP03337	BB18794	707	02/03/2022
S112_016_01	LAP01431	NGL981597	40	19/03/2018
S112_035_02	LAP04239	BB20271	747	08/04/2022
S112_035_02	LAP04238			08/04/2022
S112_035_02	LAP04237			08/04/2022
S112_035_02	LAP04244			08/04/2022
S112_035_02	LAP04243			08/04/2022
S112_035_02	LAP04242			08/04/2022
S112_035_02	LAP04241			08/04/2022
S112_035_02	LAP04240			08/04/2022
S112_041_01	LAP09537	BB17520	624	09/02/2022
S112_041_01	LAP09539			09/02/2022
S112_041_01	LAP09542			09/02/2022

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
S112_054_01	LAP09587	BB20330	733	10/05/2022
S112_054_01	LAP09582			10/05/2022
S112_054_01	LAP09583			10/05/2022
S112_054_01	LAP09585			10/05/2022
S112_054_01	LAP09594			10/05/2022
S112_054_01	LAP09769			10/05/2022
S112_054_01	LAP09586			10/05/2022
S112_054_01	LAP09581			10/05/2022
S112_054_01	LAP09580			10/05/2022
S112_054_01	LAP09584			10/05/2022
S112_054_01	LAP09592			10/05/2022
S112_054_01	LAP09591			10/05/2022
S112_054_01	LAP09593			10/05/2022
S112_054_01	LAP09590			10/05/2022
S112_054_01	LAP09588			10/05/2022
S112_054_01	LAP09595			10/05/2022
S112_054_01	LAP09589			10/05/2022
S121_024_01	LAP01284	AGL462301	81	04/06/2018
S121_024_01	LAP01287	NGL775117 (C)		04/06/2018
S121_024_01	LAP01286	NGL758773 (C)		04/06/2018
S121_024_01	LAP01285	NGL589877 (C)		04/06/2018
S121_024_01	LAP01288			04/06/2018
S121_024_01	LAP01289			04/06/2018
S121_024_03	LAP01283	AGL557864	585	12/02/2022
S121_059_01	LAP02558	BB17676	709	19/02/2022
S121_059_01	LAP03390			19/02/2022
S121_059_02	LAP03390	BB19519	629	08/05/2022
S121_059_02	LAP02558			08/05/2022
S121_059_02	LAP04088			08/05/2022
S121_095_01	LAP06509	AGL569741	734	16/05/2022
S121_097_01	LAP04233	NGL578324	455	13/03/2021
S121_144_01	LAP30429	BB21094	794	08/05/2022
S123_010_01	LAP01314	NGL547112	44	08/03/2018
		AGL114953		
S123_010_02	LAP01319	AGL151933	45	31/05/2018
S123_010_03	LAP01294	AGL156935	78	31/01/2019
S123_010_03	LAP01536			31/01/2019
S123_010_04	LAP01306	NGL319944	53	07/03/2018
S123_010_04	LAP01321	AGL468621		07/03/2018
S123_010_04	LAP01368			07/03/2018
S123_010_04	LAP01313			07/03/2018
S123_010_04	LAP01320			07/03/2018
S123_010_06	LAP01538	AGL469746	49	21/02/2019
S123_010_08	LAP01315	AGL42828	66	31/05/2018
S123_010_08	LAP01317			31/05/2018
S123_010_08	LAP01318			31/05/2018
S123_010_08	LAP01316			31/05/2018
S123_010_09	LAP01293	AGL142633	52	15/03/2018
S123_010_10	LAP01307	N/A	76	31/05/2018
S123_010_10	LAP01308			31/05/2018
S123_010_10	LAP01309			31/05/2018
S123_010_10	LAP01310			31/05/2018
S123_010_11	LAP01304	AGL469437	55	31/05/2018

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
S123_010_12	LAP01303	AGL468613	56	19/03/2018
S123_010_13	LAP01312	AGL30649	77	20/07/2018
S123_011_01	LAP01228	AGL305922	54	15/03/2018
S123_011_01	LAP01229	AGL461543 AGL461544 AGL471788 NGL353095		15/03/2018
S123_012_01, S123_012_01	LAP01339, LAP01338	AGL469440 AGL473440 AGL149264	21	12/01/2018, 12/01/2018
S123_041_01	LAP02677	AGL490407	148	15/08/2019
S123_041_01	LAP02674			15/08/2019
S123_041_01	LAP02675			15/08/2019
S123_041_01	LAP02676			15/08/2019
S123_041_01	LAP02678			15/08/2019
S123_062_01	LAP08398	AGL554810	567	07/01/2022
S123_062_01	LAP08396			07/01/2022
S211_001_02	LAP01261	AGL448847	35	08/01/2018
S211_001_02	LAP01262			08/01/2018
S211_001_03	LAP01263	AGL448847	31	10/01/2018
S211_001_03	LAP01264			10/01/2018
S211_020_01	LAP04299	N/A	837	12/04/2022
S211_020_01	LAP04301			12/04/2022
S211_020_01	LAP04302			12/04/2022
S211_020_01	LAP04298			12/04/2022
S212_039_01	LAP02282	AGL536030	460	14/04/2021
S212_039_02	LAP02283	AGL538172	485	04/06/2021
S221_002_01	LAP01325	AGL448847	28	09/01/2018
S221_002_02	LAP01327	AGL448847	30	10/01/2018
S221_002_03	LAP01329	AGL448847	36	10/01/2018
S221_002_03	LAP01328			10/01/2018
S221_002_03	LAP01330			10/01/2018
S221_002_03	LAP01331			10/01/2018
S221_002_03	LAP01332			10/01/2018
S221_002_04	LAP01333	AGL341322(L) NGL606483 NGL605721 NGL610092 AGL473991	29	08/01/2018
S221_002_05	LAP01440	AGL448847	37	12/01/2018
S221_002_05	LAP01460			12/01/2018
S221_006_01, S221_006_01	LAP01351, LAP01401	NGL214630	18	27/11/2017, 27/11/2017
S221_007_01, S221_007_01	LAP01366, LAP01335	AGL448847 (MX80070 & AGL166009 closed)	16	27/11/2017, 27/11/2017
S231_034_01_R01	LAP01381	AGL509270	46	15/04/2020
S231_034_01_R01	LAP01382			15/04/2020
S231_038_01	LAP01569	AGL197726	90	05/09/2018
S231_038_02	LAP01569	N/A	91	07/09/2018
S231_038_03	LAP01567	AGL197743	100	31/10/2018
S231_038_03	LAP01568			31/10/2018

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LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
S231_038_04	LAP01568	N/A	101	01/11/2018
S231_038_04	LAP01567			01/11/2018
S231_063_01	LAP02279	AGL505852	293	05/03/2020
S231_063_01	LAP02277			05/03/2020
S231_063_01	LAP02280			05/03/2020
S231_063_01	LAP02281			05/03/2020
S231_119_01	LAP04228	AGL536611	482	04/06/2021
S231_120_01	LAP09546	AGL550868	515	28/10/2021
S231_121_01	LAP09547	AGL554934	539	26/11/2021
S231_157_01	LAP30147	AGL567070	773	22/04/2022
S231_187_01	LAP09675	AGL550308	534	05/11/2021
S231_188_01	LAP09799		751	17/03/2022
S232_040_01	LAP01191	AGL448847	33	08/01/2018
S232_040_01	LAP01193	AGL452976		08/01/2018
S232_040_01	LAP01192			08/01/2018
S232_044_01	LAP01252	AGL440782	8	26/10/2017
S232_048_01	LAP01557	AGL452973	43	13/02/2018
S232_082_01	LAP02552	AGL50878	113	14/02/2019
S232_098_01	LAP03121		419	12/11/2020
S232_129_01	LAP08922	AGL558719	570	08/02/2022
S232_131_01	LAP04634	AGL543984	500	28/07/2021
S232_131_01	LAP09078			28/07/2021
S232_136_01	LAP04718	AGL553154	558	16/12/2021
S232_140_01	LAP09136	AGL569885	614	20/04/2022
S232_140_01	LAP09134	AGL570982		20/04/2022
S232_140_01	LAP04692	AGL570983		20/04/2022
S232_140_01	LAP09124			20/04/2022
S232_144_01	LAP04633	AGL545518	511	03/09/2021
S232_144_01	LAP07002	AGL545746		03/09/2021
S232_144_01	LAP04721			03/09/2021
S232_144_01	LAP07003			03/09/2021
S232_145_01	LAP09126	AGL558776	575	09/02/2022
S232_145_01	LAP09557	AGL558802		09/02/2022
S232_145_01	LAP09125	AGL558804		09/02/2022
S232_145_01	LAP09132	AGL558805		09/02/2022
S232_145_01	LAP09131	AGL558806		09/02/2022
S232_145_01	LAP09137	AGL558813		09/02/2022
S232_145_01	LAP09554			09/02/2022
S232_145_01	LAP09128			09/02/2022
S232_145_01	LAP09826			09/02/2022
S232_145_01	LAP09825			09/02/2022
S232_146_01	LAP08999	AGL547531	513	30/09/2021
S232_146_01	LAP09001	AGL547544		30/09/2021
S232_148_01	LAP04712		626	09/02/2022
S232_148_01	LAP04796			09/02/2022
S232_158_01	LAP09360	AGL546038	504	23/08/2021
S232_166_01	LAP04674	AGL561367	772	11/03/2022
S232_166_01	LAP09411	AGL561387		11/03/2022
S232_166_01	LAP04675			11/03/2022
S232_184_01	LAP30522	AGL571807	909	04/05/2022
S232_185_01	LAP30589	AGL581592	920	10/05/2022
S232_185_01	LAP30585	AGL581601		10/05/2022
S232_185_01	LAP30590	AGL581748		10/05/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
S311_002_01	LAP00267	NGL985306 NGL985393 NGL608064 NGL866031 NGL931492	9	30/10/2017
S311_002_02	LAP00270	NGL978354 (NGL716892 NGL878438 NGL716892 NGL883290 NGL745878 all closed)	10	01/11/2017
S311_002_03	LAP00269	NGL978389 (NGL772720 NGL775609 NGL775987 all closed)	11	06/11/2017
S311_002_04, S311_002_04	LAP00986, LAP00985	NGL987771 NGL987772(L) NGL987773	13	21/11/2017, 21/11/2017
S311_002_05	LAP01097	NGL978357	12	07/12/2017
S311_002_06	LAP00278	NGL978359 (LN10043 & NGL965610 closed)	14	23/11/2017
S311_002_07	LAP00277	NGL985401 NGL937139 NGL958585	15	28/11/2017
S311_002_08	LAP00271	NGL978362	17	30/11/2017
S311_002_09, S311_002_09, S311_002_09, S311_002_09	LAP00274, LAP00273, LAP00275, LAP00276	NGL978393	19	11/12/2017, 11/12/2017, 11/12/2017, 11/12/2017
S311_002_10	LAP00272		26	31/01/2018
S311_002_11 S311_002_11 S311_002_11 S311_002_11 S311_002_11	LAP01322 LAP00765 LAP00959 LAP01012 LAP01042	NGL987986 NGL988116	71	12/04/2018 12/04/2018 12/04/2018 12/04/2018 12/04/2018
S311_002_12	LAP00268	NGL854246	27	21/12/2017
S311_002_13 S311_002_13 S311_002_13 S311_002_13	LAP00764 LAP00960 LAP00961 LAP00763	NGL983487	87	21/09/2018 21/09/2018 21/09/2018 21/09/2018
S311_002_14 S311_002_14 S311_002_14 S311_002_14	LAP01009 LAP01010 LAP01323 LAP01324	NGL983896	80	24/05/2018 24/05/2018 24/05/2018 24/05/2018

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
S311_007_01	LAP01267	NGL927838 NGL938665 NGL930169 NGL880150 NGL931402 NGL934481 NGL935038 NGL935154 NGL935595 NGL935596 NGL939047 NGL960538	22	04/12/2017
S311_007_02	LAP01267	NGL289842 NGL914907	24	13/12/2017
S311_008_01	LAP01359	NGL665906	58	12/04/2018
S311_008_01	LAP01358			12/04/2018
S311_008_01	LAP01360			12/04/2018
S311_012_01	LAP00795		574	26/02/2022
S311_021_01_R04, S311_021_01_R04, S311_021_01_R04, S311_021_01_R04	LAP00988, LAP00991, LAP00989, LAP00990	NGL974910 NGL974911	7	21/09/2017, 21/09/2017, 21/09/2017, 21/09/2017
S311_021_02_R04	LAP00987	NGL924259	6	25/09/2017
S311_022_01	LAP00994	NGL287021	1	03/08/2017
S311_022_02	LAP00995	NGL290213	2	03/08/2017
S311_032_01	LAP00770	NGL983718	72	12/04/2018
S311_032_01	LAP00279	NGL859383		12/04/2018
S311_032_01	LAP00281	NGL864230		12/04/2018
S311_032_01	LAP00280			12/04/2018
S311_032_02	LAP01011	NGL985661	73	05/09/2018
S311_032_02	LAP00768			05/09/2018
S311_032_02	LAP00971			05/09/2018
S311_036_01	LAP01439	NGL930597 (Title Closed)	20	29/11/2017
S311_037_01	LAP01461	NGL907039(c)	23	04/12/2017
S311_055_01	LAP01750	NGL924748 LH now closed and merged with head lease NGL287021	70	12/04/2018
S311_056_01	LAP02106	NGL984754	88	23/08/2018
S311_056_01	LAP02096			23/08/2018
S311_056_01	LAP01973			23/08/2018
S311_098_01	LAP02891	BB1520 NGL919270	151	30/08/2019
S311_128_01	LAP04174	NGL513522 NGL849448 (L) C	439	08/01/2021
S311_133_01	LAP05869	BB19882	841	12/04/2022
S311_133_01	LAP05868			12/04/2022
S311_133_01	LAP30451			12/04/2022
S311_161_01	LAP09784	BB18242	618	18/02/2022
S311_161_01	LAP09980			18/02/2022
S311_186_01	LAP30270	BB17347	617	10/02/2022
S311_187_01	LAP30293	BB18823	851	15/04/2022

Table 1_HS2 Acquired Land GVDs_Final

LAAID	LAPID	Land Registry Title(s)	GVDNumber	Legal Vesting Date
S411_018_01	LAP02680	BGL168768	619	23/02/2022
S411_057_01	LAP09156	BGL169351	795	18/03/2022
S411_058_01	LAP08159	BGL168769	635	23/02/2022
S411_058_02	LAP08158	BGL168622 BGL168645 BGL168646	636	23/02/2022
S411_064_01	LAP05037	BGL170178	723	04/03/2022
S411_064_01	LAP05038			04/03/2022
S411_064_01	LAP05039			04/03/2022
S411_075_01	LAP09435	AGL571804	821	08/04/2022
S411_075_01	LAP09430			08/04/2022
S411_075_01	LAP09431			08/04/2022
S411_076_01	LAP09434	BGL171728	768	18/04/2022
S411_076_01	LAP09685			18/04/2022
S411_076_01	LAP09687			18/04/2022
S411_076_01	LAP30264			18/04/2022
S411_080_01	LAP30273	AGL572409	869	29/04/2022
S411_080_01	LAP09596			29/04/2022
S411_080_01	LAP09597			29/04/2022
S411_087_01	LAP30341	BGL172035	791	08/05/2022
S411_087_01	LAP30342			08/05/2022
S411_088_01	LAP30318	BGL169372	789	18/03/2022

Map No.	Plot label	Questions arising
53	C223 072	TPO issued 29/07/2018 but has GVD been treated?
56	C231 186	TPO issued. but has GVD been treated?
67	C244 074	TPO issued. but has GVD been treated?
70	C311 084	TPO issued. but has GVD been treated?
78	C314 038	TPO issued. but has GVD been treated?
87	N111 001	TPO issued 11/04/2018 but has GVD been treated?

Map No.	Plot Label	
34	???	This is Chalfont St Giles Air Vent Shaft. Where is proof of ownership? Have you found the bentonite?
42	C211 031	According to Land Registry this land purchased by SoS DfT 21/04/2016 and yet saw fit to issue a TPO 07/08/2018 Why?
44	C212 025	According to Land Registry this land purchased by SoS DfT 24/11/2015 and yet saw fit to issue a TPO 18/07/2018 Why?
50	C221 210 01	Land Registry search showed this land still owned by Golf Club a year after deadline. Was GVD treated in good time?
68	Parkside?	No evidence of ownership or possession.
69	Iletts Farm	Land registry says SoS DfT purchased in 2019. Why does that still need confirmation?
74	C313 071 C313 065	According to Land Registry this land purchased by SoS DfT way back in 2014. So why TPO's issued in 28/07/2020 and 05/08/2019?
79	C315 075	According to Land Registry this land purchased by SoS DfT in 2019. Was it memory loss caused it to be TPO'd 02/12/2019?

Mary Barraclough

From: HS2Injunction
Sent: 13 April 2023 12:17
To: Mark Keir
Subject: RE: QB 2022 BHM 00044 16 May Review Submission Mark Keir [DLAP-UKMATTERS.FID6569426]

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr. Kier

We refer to your email to the court of 11 April 2023 below and the court's email to you of 5 April 2023.

The submissions you have provided do not contain the exhibits that are referred to therein. We also note that you state you have not finalised the evidence to accompany your submissions, which suggests there may be further evidence you intend to provide that is not referred to within the submissions. Your failure to provide these exhibits significantly hampers the Claimants' ability to understand your objections to their current application and to decide whether to prepare and submit reply evidence by the deadline of 17 April 2023.

The Directions Order made by the court on 15 March 2023 is very clear that if you wish to amend the Injunction Order or oppose our clients' application, you must file with the court and serve a statement of case and any evidence upon which you seek to rely by 4pm on 11 April 2023.

That deadline has now passed.

Further, the court was clear in its email to you of 5 April 2023 that if you wish to vary or set aside the Directions Order, a formal application notice is required and informal emails will not suffice.

If you now intend to submit evidence after the deadline in the Directions Order a formal application will need to be made to the court for this evidence to be admitted. Our clients expect that application to be made in sufficient time ahead of the hearing listed for 16 May 2023 in order that they have time to: (i) consider that application; (ii) file evidence in response (if necessary); and (iii) have a viable amount of time to prepare for the hearing.

In respect of your Notice to call witnesses, this will be resisted by the Claimants as:

1. Mr. Richard Jordan has not given a further witness statement in these proceedings. The evidence set out in Mr. Jordan's witness statement of 23 March 2022 has previously been reviewed and accepted by the court prior to Mr. Justice Knowles granting the Injunction Order. Your notice does not explain on what basis your opposition to our clients' current application requires the re-examination of Mr. Jordan's evidence.
2. Mr. Mark Harper has not given a witness statement in these proceedings. As such he cannot be called for cross-examination.

Yours sincerely

DLA Piper UK LLP

From: Mark Keir
Sent: Tuesday, April 11, 2023 2:25:19 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: qb.birmingham@justice.gov.uk; HS2Injunction
Subject: QB 2022 BHM 00044 16 May Review Submission Mark Keir

****EXTERNAL****

Dear all

Please find attached submission.

Owing to time limitations beyond my control, and owing to off grid technical issues I have not finalised the evidence to go with this submission. It will be with you shortly.

Mark Keir

Mary Barraclough

From: HS2Injunction
Sent: 13 April 2023 13:07
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: QB 2022 BHM 00044 16 May Review Submission Mark Keir [DLAP-UKMATTERS.FID6569426]

Follow Up Flag: Follow up
Flag Status: Completed

From: Mark Keir
Sent: Thursday, April 13, 2023 1:06:37 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: HS2Injunction
Cc: qb.birmingham@justice.gov.uk
Subject: Re: QB 2022 BHM 00044 16 May Review Submission Mark Keir [DLAP-UKMATTERS.FID6569426]

****EXTERNAL****

Dear all

I am in no position to pay costs of variance. As far as getting my evidence in on time, I am doing my best, but I refer you to Natural Justice and the need for adequate time to prepare.

Mark Keir

On Thu, 13 Apr 2023, 12:17 HS2Injunction, <HS2Injunction@dlapiper.com> wrote:

Dear Mr. Kier

We refer to your email to the court of 11 April 2023 below and the court's email to you of 5 April 2023.

The submissions you have provided do not contain the exhibits that are referred to therein. We also note that you state you have not finalised the evidence to accompany your submissions, which suggests there may be further evidence you intend to provide that is not referred to within the submissions. Your failure to provide these exhibits significantly hampers the Claimants' ability to understand your objections to their current application and to decide whether to prepare and submit reply evidence by the deadline of 17 April 2023.

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1. Mr. Richard Jordan has not given a further witness statement in these proceedings. The evidence set out in Mr. Jordan's witness statement of 23 March 2022 has previously been reviewed and accepted by the court prior to Mr. Justice Knowles granting the Injunction Order. Your notice does not explain on what basis your opposition to our clients' current application requires the re-examination of Mr. Jordan's evidence.
2. Mr. Mark Harper has not given a witness statement in these proceedings. As such he cannot be called for cross-examination.

Yours sincerely

DLA Piper UK LLP

From: Mark Keir
Sent: Tuesday, April 11, 2023 2:25:19 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: qb.birmingham@justice.gov.uk; HS2Injunction
Subject: QB 2022 BHM 00044 16 May Review Submission Mark Keir

****EXTERNAL****

Dear all

Please find attached submission.

Owing to time limitations beyond my control, and owing to off grid technical issues I have not finalised the evidence to go with this submission. It will be with you shortly.

Mark Keir

High Speed Two (HS2)Ltd & Secretary of State for Transport

V

Persons unknown and Ors
Review Hearing 16th May 2023

Grounds for Defence
Of
Mark Keir Defendant No.36
Second Statement.

1. I am Mark Keir, of Jones' Hill Wood, [REDACTED]
2. I am an unashamed peaceful and diligent campaigner against HS2 (mainly), and have been for many years.
3. I believe all the following Statement to be factually correct and honest to the very best of my knowledge.
4. I refer you to **Exhibit 7**. The tone of this report is crystal clear. It is absolutely impossible that HS2 operations can possibly remain within the damage confines laid out in the Environmental Statement (ES) that is such a crucial part of the Act
5. I refer you to **Exhibit 8** which has of course been shown to previous hearings. The tone of this report is crystal clear too. The damages HS2 are inflicting on our environment are far beyond the limits contained in the ES.
6. I refer you to **Exhibit 9**. Here you see two photographs additional to the report at **Ex 8**. The first taken last year in July shows an utterly failed compensatory measure. The second is an aerial photo of the same site taken in April '23. Again, it shows a miserably failed compensatory measure.
7. Such failures are legion. I refer you to all my previous statements.
8. I refer you to a quote from the main author of the Wildlife Trusts report at **Ex 7**. She says on Cheshire Wildlife Trusts website:
"The water vole site at Swill Brook has been identified as a hedge in the calculations, it's not even correctly identified as water. This is the habitat of a nationally endangered species. The issue is that this type of carelessness is replicated thousands of times"
9. If I had proper time to prepare I'd bring to light the breaches of the Environmental Statement at Euston, Old Oak Common, West Ruislip, many many times at Harefield, many many times at Denham, at Maple Cross, Bottom House Farm Lane, Small Heath, King's Lane, Leather Lane, Grim's Ditch, Wendover, Aylesbury, Poor's Piece, Calvert Jubilee, Long Itchington, Cubbington, Crackley.
10. Those are only the ones I'm clear on. There are many others I'm sure.
11. Each and every one a criminal transgression, and each and every one removing any legitimacy of the ES.
12. If the ES has no legitimacy, there is no deemed planning permission. All HS2 works are criminal.
13. This cannot go on being protected by an injunction.
14. I should be prosecuting, not defending against serial harassment.

I believe all the preceding statement and the evidence to back it up to be an honest, sincere and truthful account.

I rest my Case

A handwritten signature in blue ink, appearing to read 'M. A. C.', is centered on the page.

13th April 2023



The
Wildlife
Trusts

HS2 Double Jeopardy

How the UK's largest infrastructure project undervalued nature and overvalued its compensation measures

An evidence review of HS2 Ltd's
'No Net Loss' by The Wildlife Trusts

February 2023

CORE-C-122

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WOODLAND © ANDY BARTLETT

FIELD TREE © PAUL HARRIS/2020VISION



POND © JON HAWKINS

HEDGEROW © CHRIS COMERSALL/2020VISION

Preface

In January 2020, The Wildlife Trusts published a report, *What's the Damage? Why HS2 will cost nature too much*. At that point, it was the most comprehensive assessment of the environmental impact of the HS2 rail project on the natural world and revealed the broad range of impacts across all phases of HS2's construction on protected wildlife sites, species and landscape restoration projects. It showed how the design and route of HS2 put ancient woodlands and many other highly valuable wild places at risk and was the first time that the public, politicians and Government departments had been alerted to the full scale of environmental implications – and the extent of damage it would leave in its wake.

Despite the risk revealed to the natural world by the current design of HS2, little has changed and the route at present remains much the same. HS2, however, is still very much in its delivery stages, and opportunities to address some of the damage to the natural world remain. To strengthen the case for action, The Wildlife Trusts have produced a new evidence report, presented here, which studies the accuracy of HS2 Ltd's (the company responsible for delivering HS2) own nature data and reveals serious flaws in HS2 Ltd's approach to assessing biodiversity impacts. It is now clear that HS2 Ltd has hugely undervalued the nature that's being destroyed by construction along the route – and overvalued its nature compensation measures. This combination of bias and error in HS2 Ltd's approach puts nature in double jeopardy. The evidence is damning.

HS2 Ltd promises that nature will not lose out when landscapes and important habitats are destroyed to make way for construction of the high-speed rail line. Ensuring there's enough good quality nature compensation relies on accurate baseline assessments of the value of wildlife habitats along the route. For example, are the grasslands rich in wildflowers? Are the woodlands made up of native tree species such as oak and ash?

HS2 Ltd's datasets have been both difficult to access and decipher, but Cheshire Wildlife Trust has used all available information to conduct a year-long audit – the results of

which challenge HS2 Ltd's official nature loss statistics, reveal outdated and inaccurate calculation methods, and expose a lack of transparency.

As a flagship project, HS2 Ltd needs to radically overhaul the way it calculates nature loss. It is deeply disappointing that as the UK's biggest infrastructure programme, it has not committed to create a net gain for nature along the entire route. While it has committed to delivering Biodiversity Net Gain for Phase 2b, unlike most other developments in the pipeline, HS2 Ltd will be under no legal obligation to do this, or to deliver at a minimum of 10% biodiversity net gain across the whole development.

It needs to do much better, and to be held to account by the UK Government for its current failings.

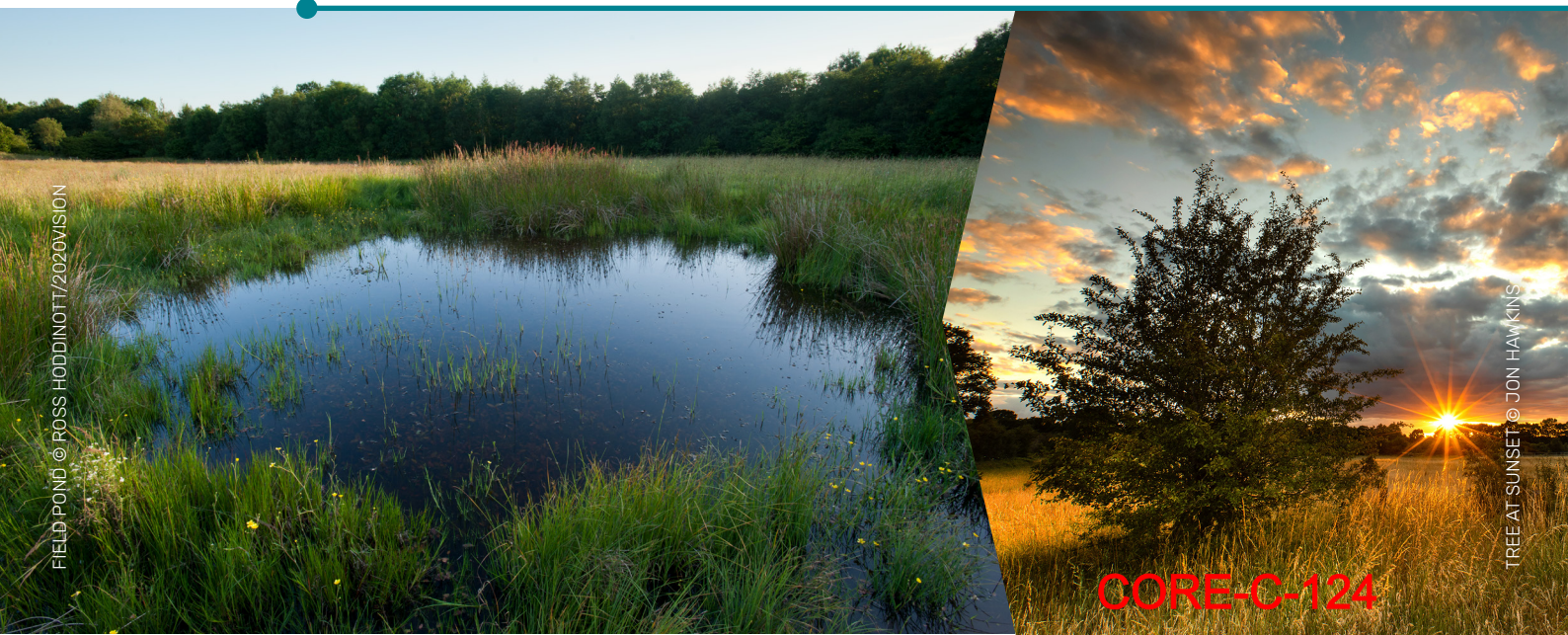
This vast infrastructure project is taking a wrecking-ball to wildlife and communities are in despair at losing the wild places – the woods, meadows and wetlands that they love – they will never get these back. So HS2 Ltd must repair nature in a way that's commensurate with the damage being caused and provide far more nature compensation than it is currently offering because it has seriously underestimated the impacts to biodiversity.

10% Biodiversity Net Gain is surely the absolute bare minimum that HS2 Ltd should offer after all the damage and heartbreak it has caused.

We are in a nature and climate emergency and Wildlife Trusts along the route are witnessing the destruction that the scheme is inflicting on the natural world and wild places. How HS2 Ltd values and restores the natural environment will have a lasting impact on us all.

Craig Bennett

Chief Executive, The Wildlife Trusts
February 2023



Summary of audit findings

In September 2021, The Wildlife Trusts commissioned Cheshire Wildlife Trust to investigate the accuracy of HS2 Ltd's nature data, which measures impacts on biodiversity caused by the construction of the line, and to use these findings to assess whether HS2 Ltd is likely to fulfil its No Net Loss of biodiversity objectives. To deliver No Net Loss, the HS2 high speed rail scheme would have to balance damage to biodiversity caused by its construction with at least equivalent gains for nature. Any damage to irreplaceable ancient woodland is not part of No Net Loss calculations and compensated for separately.

The high-speed line is being built in phases; HS2 Ltd has an aspiration to go beyond its commitment to No Net Loss of biodiversity on Phase 1 currently under construction, and on Phase 2a, being prepared for construction. It says it will create a net gain for biodiversity for non-irreplaceable habitats along the forthcoming Phase 2b of the route; Biodiversity Net Gain means the natural environment should be left in a measurably better state than it was beforehand.

Taking a conservative approach to its assessment, Cheshire Wildlife Trust found alarming errors, indicative of a large-scale problem, and which call into question the adequacy of all HS2 Ltd's nature restoration, and compensation plans.

Using HS2 Ltd's own data where available and additional information to show the type and quality of each habitat, Cheshire Wildlife Trust interrogated HS2 Ltd's mapping and assessment of existing nature along the route and found a catalogue of errors.

To replicate HS2 Ltd's approach as closely as possible, Cheshire Wildlife Trust recalculated the impacts to biodiversity caused by the construction of Phases 1 and 2a of the scheme using HS2 Ltd's own No Net Loss biodiversity units (NNL units). HS2 Ltd's No Net Loss biodiversity units measure the value of different habitats according to their size and how nature-rich they are. For the post-construction assessment (i.e., assessment of nature once the scheme is built) the only amendments were to correct obvious mistakes made by HS2 Ltd.

In addition to the catalogue of errors when assessing the pre-existing nature, this audit found that HS2 Ltd's metric (its 'accounting tool' for assessing impacts on nature) is untested, out of date and fundamentally flawed.

The Wildlife Trusts calculated the difference between the existing biodiversity value (as identified by Cheshire Wildlife Trust using HS2's NNL biodiversity units and metric) and the biodiversity value HS2 Ltd has said will be present after construction. In terms of HS2 Ltd's NNL units, our analysis revealed:

Across Phase 1(2021 scheme): 7.9 times more biodiversity loss than that calculated by HS2 Ltd

Across Phase 2a: 3.6 times more biodiversity loss than that calculated by HS2 Ltd

HS2 Ltd is underestimating the value of the nature that will be damaged or destroyed during the route's construction and overestimating the impact of the nature compensation it is putting in place (post construction).

For example, within HS2 Ltd's pre-construction footprint, many habitats such as field trees, ponds, watercourses and hedgerows are misrepresented, undervalued or in some cases not accounted for at all. This means that HS2 Ltd needs to provide far more nature compensation than it thinks is necessary, due to its serious underestimation on the impacts to nature.

Much of HS2 Ltd's data is hard to access. This, combined with HS2 Ltd's own inadequate methodology means Cheshire Wildlife Trust's figures in this report are almost certainly an underestimate and are indicative of the scale of the issues, rather than definitive. They are a warning of the likely errors and inaccuracies built into HS2 Ltd's current approach.

Comparing the assessments carried out by HS2 Ltd with those carried out by Cheshire Wildlife Trust, it is clear that HS2 Ltd's calculations result in some glaringly inaccurate values for the loss of biodiversity resulting from both Phase 1 and Phase 2a. In summary, a comparison of No Net Loss calculations is as follows:

For Phase 1

(2021 scheme), Cheshire Wildlife Trust's assessment indicates a minimum net loss of **4,367 NNL units** (**17.36%** loss of the pre-construction biodiversity value in NNL Units). This compares to a net loss of **555 NNL units** (**2.60%** loss of the pre-construction biodiversity value in NNL units), as calculated by HS2 Ltd.

For Phase 2a

Cheshire Wildlife Trust's assessment indicates a minimum net loss of **4,891 NNL units** (**42.80%** loss of the pre-construction biodiversity value in NNL Units). This compares to a net loss of **1,342 NNL units** (**17.01%** loss of the pre-construction biodiversity value in NNL units), as calculated by HS2 Ltd.

Consequently, as things stand, HS2 Ltd will not compensate sufficiently for the damage likely to be caused by Phases 1 and 2a of the scheme, and if it uses the same methods, it will not come close to delivering a Net Gain for Biodiversity for Phase 2b. In essence it is not able to account credibly for the impact of HS2 on biodiversity.

Issues include:

Significant mapping errors and poor digitisation. Numerous field trees, ponds, other waterbodies and watercourses (ditches and drains) are unaccounted for in the baseline mapping and are therefore excluded from the assessments.

Watercourses: As a result of HS2 Ltd's flawed No Net Loss metric, there's no differentiation between rivers, streams or ditches with running water. Any damage caused during the construction of the scheme is essentially unaccounted for and HS2 Ltd is only accounting for the overall loss in length, rather than the nature value of a specific river or stream.

Woodland: HS2 Ltd's No Net Loss metric overvalues the woodland that the company will create to compensate for the loss of existing species-rich woods by at least half, and overvalues grassland it plans to create to compensate

for the loss of existing species-rich grassland by at least a third, compared to the current industry standard.

Hedgerows: Many hedgerows have been significantly undervalued in baseline calculations, and overvalued in the post-construction assessments, particularly compared to the current industry standard.

CONCLUSION

The HS2 No Net Loss metric is neither evidence-based nor was subject to wider consultation. Due to a fundamental lack of transparency, it has taken four years for the extent of the issues to be finally recognised. HS2 Ltd has published its No Net Loss figures years in advance of releasing the supporting datasets and has therefore denied the opportunity for proper review and independent scrutiny.

The HS2 No Net Loss figures released in 2017, 2019 and 2021 are wholly unreliable. They are based on poor quality data riddled with inaccuracies and rely on an untested assessment methodology that has been subject to little independent scrutiny and no independent quality assurance. The way in which HS2 Ltd is publishing and communicating its No Net Loss percentage figures is highly misleading.

RECOMMENDATIONS

We recommend that:

- 1 HS2 Ltd should re-map existing habitats along Phases 1 and 2a, correcting mapping errors, applying the correct nature values to habitats, and ensuring no habitats are excluded.
- 2 HS2 Ltd should recalculate the total impacts to nature, by using an up to date and proven methodology, such as one directly comparable to the government's current Biodiversity Metric 3.1. If changes to the methodology are made these should be transparent and evidence based. It is critical that HS2 Ltd ensure all data is made publicly available at the point the figures are released to facilitate transparency and enable independent scrutiny.
- 3 The Westminster Government should respond swiftly to our findings, while there is still time to change the scheme's design and delivery to limit the adverse impacts and enhance biodiversity in a way that is commensurate with the scale of the damage i.e., by achieving a minimum 10% biodiversity net gain for replaceable habitats for each phase of the scheme.
- 4 HS2 Ltd should immediately pause all construction and enabling works and halt the passage of the Phase 2b Hybrid Bill while these latest audit findings are assessed by the Government.

For full details read the accompanying report below: Review of High Speed 2 No Net Loss Phases 1 and 2a Report by Cheshire Wildlife Trust on behalf of The Wildlife Trusts. Based on evidence gathered through an investigation by the Evidence and Planning team at Cheshire Wildlife Trust.

Background

METRIC

HS2 Ltd has developed its own distinct, and modified 'accounting tool' for nature, based on a 2012 Defra pilot metric. HS2 Ltd has been very clear that it is not using these calculations to inform the provision or the appropriateness of compensatory habitat. The like for like or better rule of the current up-to-date government metric is not being applied. The result is that, for example, many complex and well-developed semi-natural woodland ecosystems will be replaced with simplistic homogenous habitats of little value to wildlife.

In 2016 Natural England reported '*In light of the wide-ranging issues that using the HS2 NNL metric as an accounting tool has presented, it is recommended that for Phase 2 of the scheme a metric is applied for biodiversity offsetting purposes, i.e., a tool to inform compensation provision. It is considered that this would be beneficial for the natural environment, for reporting purposes and for HS2 Ltd.*'

The HS2 No Net Loss calculations demonstrate that HS2 Ltd has not taken on board these particular recommendations from Natural England and the No Net Loss metric is still not being used to inform the type of compensation required.

HS2 Ltd also works under a different set of environmental rules, which means unlike most other forthcoming developments, it will not have to deliver at least 10% Biodiversity Net Gain only No Net Loss of biodiversity.

ROUTE

HS2 is England's biggest infrastructure project in modern times. Stretching from London to Manchester, it is being delivered in three phases:

1. Phase 1 (London to Birmingham)

From London to a junction with the West Coast Main Line near Lichfield with a branch to Birmingham. Construction on the line began in 2020 and tunnelling for the first phase began under the Chiltern hills just outside London in 2021. Full construction of the line is now underway.

2. Phase 2a (Birmingham to Crewe)

From Lichfield to another junction with the West Coast Main Line at Crewe, has achieved royal assent, allowing it to begin enabling works including links to highways, compounds, and utilities; full construction is expected to begin in summer 2024.

3. Phase 2b western leg (Crewe to Manchester)

A Hybrid Bill is seeking Parliamentary approval for Phase 2b from Crewe to Manchester, with a link to the West Coast Main Line at Crewe for trains to join the existing network and continue to Scotland and from the West Midlands to East Midlands Parkway where HS2 joins the conventional rail Midland Main Line.

The Phase 2b Eastern Leg to Leeds and the Golborne Link has been cancelled.

HS2 AND THE WILDLIFE TRUSTS

The Wildlife Trusts support the need for better and more sustainable public transport, but nature, which is a vital ally in the fight against the climate crisis, must not pay the price.

For more than a decade The Wildlife Trusts have highlighted the impacts on nature of the HS2 route, the scheme's design and the UK Government's approach to its delivery

In 2014, The Wildlife Trusts set out a 'Greener Vision' offering ideas for large-scale nature restoration along the proposed route.

In January 2020, The Wildlife Trusts' report: [What's the Damage? Why HS2 will cost nature too much](#) highlighted the impacts for wildlife and wild places, increased habitat fragmentation and the possibility of local area extinction of endangered species. The report's findings were supported by National Trust, RSPB and Woodland Trust.

HS2 states it is "the UK's flagship transport levelling up project". 'Levelling up' needs to ensure nature, with all the wellbeing benefits it brings to communities living close to the route, does not lose out.

In 2022 Cheshire Wildlife Trust, as the leading local environmental NGO in the area impacted by HS2 Phase 2b, submitted its petition to the High Speed Rail (Crewe-Manchester) Bill. Amongst other objections it cited "a reprehensible lack of transparency regarding how HS2 Ltd has assessed the likely impacts to the natural environment".

Four Wildlife Trusts – Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, The Wildlife Trust for Birmingham and the Black Country, Cheshire Wildlife Trust, and Herts and Middlesex Wildlife Trust – manage nature reserves that have been directly impacted by construction or compulsory purchase by HS2 Ltd. Eleven Wildlife Trusts are based in counties affected by the planned route.

Phase 1 (London to West Midlands)

- London Wildlife Trust
- Herts and Middlesex Wildlife Trust
- Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust
- The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire
- Warwickshire Wildlife Trust
- Staffordshire Wildlife Trust
- The Wildlife Trust for Birmingham and the Black Country

Phase 2a (West Midlands to Crewe)

- Staffordshire Wildlife Trust
- Cheshire Wildlife Trust
- Warwickshire Wildlife Trust

Phase 2b western leg (Crewe to Manchester)

- The Wildlife Trust for Lancashire, Manchester and North Merseyside
- Cheshire Wildlife Trust.
- Warwickshire Wildlife Trust

HS2 East Core Network

- Nottinghamshire Wildlife Trust and Leicestershire and Rutland Wildlife Trust are based in counties which might be impacted by HS2 East Core Network. *(Integrated Rail Plan for the North and Midlands, Department for Transport, pg 76)*





The
Wildlife
Trusts

Review of High Speed 2 No Net Loss Phases 1 and 2a

A report by **Cheshire Wildlife Trust**
on behalf of The Wildlife Trusts

February 2023

CORE-C-129

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Executive summary

This review of the High Speed 2 (HS2) No Net Loss (NNL) interim figures has highlighted that both the underpinning habitat data and No Net Loss calculation methodology are fundamentally flawed. This has led to two key failures:

1. Undervaluation of the existing biodiversity value of HS2's construction footprint.
2. Overvaluation of the scheme's biodiversity value post-construction.

When we examined the pre-construction assessments for HS2 Phases 1 and 2a we found the HS2 data used to evaluate biodiversity had a high number of mapping errors and inconsistencies. Furthermore, many habitats such as field trees, ponds, watercourses, and hedgerows are misrepresented, undervalued or sometimes not accounted for at all. This has led to a serious underestimation of the preconstruction biodiversity value¹.

For habitats other than watercourses and hedgerows we believe the undervaluation of the baseline pre-construction biodiversity value is at least 3,773 NNL units for Phase 1 (2021). This is a 16.21% difference from HS2 Ltd.'s reported figure. For Phase 2a (2019) the undervaluation is at least 3,541 NNL units, a 36.67% difference from HS2 Ltd.'s figure. The undervaluation could be greater than this if the process was repeated applying current industry standards. We did not calculate the overall figures for linear habitats (hedgerows and watercourses).

The post-construction biodiversity value has been calculated using the HS2 No Net Loss metric, an untested methodology based upon an adapted version of a now redundant 2012 pilot biodiversity metric. This means the impacts cannot be compared to biodiversity losses and gains from projects that adhere to current industry standards.

When compared to the government's current Biodiversity Metric 3.1, we found numerous errors in HS2 Ltd's post-construction calculations. Of most concern was a substantial overvaluation of watercourses, woodland, and grasslands, which HS2 Ltd will create to compensate for the loss of existing species rich woods and grassland habitats. We also found the HS2 metric is disproportionately weighted in favour of new hedgerow creation and provides an inaccurate assessment of the overall impacts to the hedgerow network.

We conclude that the HS2 No Net Loss figures released in 2017, in 2019 and in 2021 are wholly unreliable. These are based upon poor quality data riddled with inaccuracies and rely on an untested assessment methodology that is subject to little independent scrutiny and no independent quality assurance². The way in which HS2 Ltd. is publishing and communicating its No Net Loss percentage figures is highly misleading.

Context

Biodiversity net gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. This approach cannot be used for habitats such as ancient woodland which are deemed to be irreplaceable.

In its Environmental Sustainability Progress report 2022 HS2 Ltd. committed to achieving a 10% net gain in biodiversity on Phase 2b to Manchester and stated its aspiration to go beyond their previous commitment to No Net Loss on Phase One and Phase 2a.

Although not likely to be a legal requirement for large scale infrastructure projects until 2025 (and for other developments in 2023) HS2's net gain objective is a welcome goal and represents a positive shift in biodiversity policy from originally seeking to achieve No Net Loss (NNL)³ of biodiversity for replaceable habitats at a route-wide level. HS2's biodiversity objective emerged from national and international policies including, but not limited to, the England Biodiversity 2020 Strategy, the 25 Year Plan for the Environment (2018), the National Planning Policy Framework 2012⁴, 2018, 2021 and the UK's implementation of the International Convention on Biological Diversity.

In 2017 HS2 Ltd. reported that undertaking calculations for the No Net Loss objective *'has been a major undertaking and is by far the most complex example of any such calculation utilising a biodiversity metric (including those used to define compensation requirements) to be undertaken in the UK'*. In 2017 it released figures and revised methodology for calculating No Net Loss for Phase 1 of the scheme and in 2019 the equivalent figures were released for Phase 2a. Since then, there have been updates to the reported Phase 1 figures in 2020, 2021 and 2022. The most recent 2022 update reported:

'Linear habitats, hedgerows and watercourses, are both showing overall gains in biodiversity units of 10.23% and 7.77% respectively, a significant improvement on both the 2017 baseline and the previous updates. This indicates that it is possible to achieve a net gain position on linear habitats on large infrastructure projects. Area-based habitats are reported at -2.93%. This represents an improvement from the 2017 baseline report which was -7.14% but a worsening from the Q1 2021 figure of -2.6%.'

As a member of the Ecology Review Group for HS2 The Wildlife Trusts have repeatedly asked for access to HS2's No Net Loss data (in the form of a GIS⁵ geodatabase), highlighting that the scale and complexity of the calculations required transparency so that HS2's figures could be independently reviewed.

Four years after release of the Phase 1 2017 progress report (in November 2021), the 2017 No Net Loss data was made available via the Ecology Review Group. This dataset included the baseline No Net Loss habitat assessments from which subsequent calculations of percentage losses or gains are undertaken.

In September 2021, The Wildlife Trusts commissioned the Cheshire Wildlife Trust (CWT) to review the No Net Loss calculations for Phases 1 and 2a of the scheme. Using the available HS2 datasets in addition to habitat information held by The Wildlife Trusts, national datasets and aerial imagery, CWT independently mapped and evaluated the area-based habitats⁶ and calculated the number of HS2 'NNL units' in the footprint of HS2 Phases 1 and 2a.

At the time of writing this study represents the only independent full-scale reappraisal of progress towards the HS2 No Net Loss objective.

Methodology

OVERVIEW

HS2 Ltd. use its No Net Loss metric as an 'accounting tool' to compare the losses and gains in biodiversity units⁷ as a result of the scheme. This contrasts with the government's Biodiversity Metric 3.1 (Defra metric) which is intended to inform⁸ decisions on planning, design, and the provision of biodiversity compensation. The HS2 No Net Loss methodology is based upon an adapted⁹ version of the pilot Biodiversity Metric dating back to 2012.

The No Net Loss calculations assess the likely impacts to habitats, hedgerows, and watercourses. These are reported separately as area-based (habitat) units, hedgerow units and watercourse units.

This study reassesses the losses and gains for HS2 determined area-based units (referred to as NNL units in this report) as a consequence of HS2 Phase 1 (published by HS2 Ltd. in 2017 and 2021) and Phase 2a (published by HS2 Ltd. in 2019). We also reviewed the methodology utilised by HS2 Ltd. for measuring the impacts to hedgerows and watercourses, although we have not reassessed the impacts to these linear habitats.

In order to test the reliability of the HS2 Ltd. calculations we replicated, as far as possible, the pre-construction baseline assessment¹⁰ of biodiversity by mapping area-based habitats and attributing habitat distinctiveness categories¹¹ and condition values¹² according to the criteria used by HS2 Ltd.

The approach¹³ taken by HS2 Ltd. can be summarised as:

- **Pre-construction** – the baseline biodiversity value for area-based units, hedgerow units and watercourse units is calculated by multiplying the habitat distinctiveness value by the habitat condition value.
- **Post construction** – the biodiversity value for area-based units, hedgerow units and watercourse units is calculated by multiplying the habitat distinctiveness value by the habitat condition and two risk factors (i.e., multipliers that account for the difficulty of creating or enhancing different habitat types and the time it takes a created or enhanced habitat to achieve its target condition).

CALCULATING THE PERCENTAGE REDUCTION IN NNL UNITS

The percentage reduction of NNL units as a result of the scheme is calculated by HS2 Ltd. as follows.

HS2 Biodiversity Unit Calculation for Area-based Habitats and Hedgerows

For area-based habitats and hedgerows HS2's assessment of No Net Loss is calculated as the percentage reduction between:

- The pre-construction baseline biodiversity value of the scheme's footprint, and;
- The predicted post-construction biodiversity value¹⁴ of the scheme once delivery risk and time to target condition have been accounted for.

HS2 Biodiversity Unit Calculation for Watercourses

For watercourses, HS2 Ltd.'s assessment No Net Loss is calculated as the percentage reduction between:

- The pre-construction baseline biodiversity value of the scheme's footprint, and;
- The predicted post-construction biodiversity value of the scheme.

Notably the HS2 metric:

- Allocates the same habitat distinctiveness value pre- and post-construction for all hedgerows and watercourses (i.e., all allocated a distinctiveness value of 1).
- Does not apply risk multipliers¹⁶ for watercourses (i.e., risk multipliers are set at 1 in the calculations).

PRE-CONSTRUCTION NNL UNIT ASSESSMENT

The methodology the Trust used is based upon that published by HS2 in its No Net Loss reports¹⁷ (2017, 2019). Further details can be found in Appendix 1 and details of datasets used can be found in Appendix 2.

Habitat parcels originally mapped by HS2 Ltd. were re-mapped or verified by CWT in GIS using supporting datasets, aerial imagery and base OS maps.

The allocation of habitat distinctiveness categories to each habitat parcel was undertaken using a set of hierarchical criteria including, but not limited to:

1. Designated site data¹⁸.
2. Priority Habitat Inventory¹⁹.
3. Phase 1 habitat survey information.
4. Local datasets.
5. Aerial imagery.

Details of how habitat distinctiveness, a measure of habitat quality, was assigned are set out in Appendix 3 (tables 12 and 13). Where the differences between habitat distinctiveness categories (i.e., a measure of habitat quality

and habitat type) were unclear, professional judgement was used to allocate habitat parcels to a specific category. For example, broadleaved semi-natural woodland was allocated a high distinctiveness category, but if the type of woodland could not be determined then a medium distinctiveness category was used.

To attribute habitat condition value, we followed the same methodology employed by HS2 Ltd which is based upon the condition criteria set out in the Farm Environment Plan^{20,21} with further details in table 13 in Appendix 3. Statutory and non-statutory designated sites (SSSIs and LWSs) were allocated a condition value of 3 (good). For all low distinctiveness habitats, we followed the HS2 methodology by allocating a condition value of 1 (poor).

To improve the accuracy of the assessment, we deviated from the HS2 methodology by:

- Including individual field trees²² where/when these have been mapped by HS2. Figures are also provided²³ that exclude field trees so that a direct comparison with HS2's figures can be made (HS2 Ltd does not include field trees in its No Net Loss assessment).
- Mapping the position of arable margins rather than applying a standard 1m buffer (as HS2 Ltd has done) and mapping road verges more precisely than HS2's assessment.
- Mapping and assessing entire ponds²⁴ where these are partially intersected by the scheme, in contrast to the HS2 assessment which does not account for the area of an impacted pond which lies outside the construction boundary.
- Using the Open Mosaic on Previously Developed Land²⁵ and Wood Pasture/Parkland Priority Habitat Inventories to inform the assessment.
- Accounting for the underlying habitats where scattered scrub²⁶ was present and valuing its condition accordingly. In contrast HS2 Ltd used an inconsistent approach and did not always account for the value of underlying habitat.
- Excluding non-parkland habitats with scattered trees (e.g., field trees in improved grassland or arable fields) from the parkland/scattered trees categories and evaluating them separately. In contrast, HS2 Ltd mapped some scattered trees as medium distinctiveness parkland.

POST-CONSTRUCTION>NNL UNIT ASSESSMENT

To replicate HS2 Ltd's approach we used HS2 post-construction No Net Loss metric data (detailed in Appendix 2) to assess post-construction area-based habitat units with the following minor amendments:

- Exclusion of buildings and built areas from the calculations (to ensure consistency with the pre-construction assessments).
- Amended risk multipliers only where these did not correspond to those published²⁷ by HS2 Ltd or where there were no published risk multipliers²⁸ (unless justification was provided).

Risk multipliers were applied according to the HS2 methodology set out in tables 14 and 15 Appendix 4.

LIMITATIONS

Some datasets that HS2 Ltd had access to were not available to CWT. Some datasets, such as pond survey data was incomplete or in a format that was not easily used.

Like HS2 Ltd, we attributed moderate condition (2) for unvisited habitats in the absence of other information and we assumed poor²⁹ condition (1) for all low distinctiveness habitats. We acknowledge that attributing habitat condition in the absence of detailed information, or where information is inaccurate, is difficult and we used our professional judgement to do this.

In some areas, where previously intensively managed land allocated to the scheme has been taken out of production, the biodiversity value has increased since the assessments were undertaken³⁰. This increase in value in recent years has not been captured in our calculations.

For all these reasons our results should be viewed as a possible undervaluation of the pre-construction baseline biodiversity value.

Results

PRE-CONSTRUCTION

The total number of NNL biodiversity units for the land in the construction footprint of HS2 (calculated using the size of each habitat parcel and its quality) are **26,285** for the Phase 1 baseline 2017, **25,162** for the revised Phase 1 2021 construction footprint and **11,428** for the Phase 2a construction footprint.

Table 1 provides an overview of the differences between the pre-construction habitat baseline of Phase 1 (2017), Phase 1 (2021) and Phase 2a.

Table 2 provides an overview of the NNL biodiversity unit value of field trees in the pre-construction baseline for Phase 1 (2017), Phase 1 (2021) and Phase 2a.

Source (scheme iteration)	HS2	CWT	Net Difference in NNL Units	Percentage difference pre-construction ³¹
Phase 1 2017	22,059	26,285	+4226	17.48%
Phase 1 2021 Q1	21,389	25,162	+3773	16.21%
Phase 2a 2019	7,887	11,428	+3541	36.67%

Table 1 Route-wide difference between pre-construction NNL biodiversity units calculated by CWT and HS2. Field trees included.

Source (scheme iteration)	No of trees mapped by HS2	Area of Trees (ha) ³²	NNL Units ³³
Phase 1 2017 ³⁴	2,851	104.35	834.77 ³⁵
Phase 1 2021 Q1 ³⁶	2,810	102.85	822.77 ³⁷
Phase 2a ³⁸	2,651	97.03	776.21 ³⁹

Table 2 NNL Biodiversity Units arising from field trees

Pre-construction Baseline Phase 1 (2017 and 2021 Schemes)

Re-mapping the No Net Loss baseline habitats across Phase 1 has demonstrated that HS2 underestimated the existing biodiversity value by **4,226 NNL units** within the 2017 scheme. Re-mapping the 2021 scheme has revealed that HS2 underestimated the existing biodiversity value by **3,773 NNL units**.

These figures include field trees that were surveyed by HS2 Ltd. in 2013, however our observations indicate it is unlikely that these surveys identified all individual field trees present within the scheme. As a result, the discrepancy between CWT and HS2 pre-construction NNL units could be even greater than we have identified. This means that in reality HS2 Ltd. is likely to have undervalued the existing pre-construction habitats to an even greater degree than we have shown above.

Pre-construction Baseline Phase 2a (2019)

Re-mapping the No Net Loss baseline habitats across Phase 2a (2019) has demonstrated that HS2 underestimated the existing biodiversity value by **3,541 NNL units** within the scheme.

These figures also include field trees that were surveyed

by HS2 Ltd. between 2015 and 2018, again however our observations indicate it is unlikely these surveys identified all individual field trees present within the scheme. As a result, the discrepancy between CWT and HS2 pre-construction NNL units could be even greater than we have identified, meaning HS2 Ltd. is likely to have undervalued the existing pre-construction habitats to an even greater degree than we have shown above.

POST-CONSTRUCTION

To replicate HS2 Ltd's approach, we recalculated the No Net Loss figures post construction using HS2 Ltd's own metric. The only amendments we have made to the post-construction figures are to correct obvious mistakes made by HS2⁴⁰. Because of HS2 Ltd's out of date methodology these figures are likely to be an overestimate, and if calculations were repeated using an up to date and appropriate metric, the post-construction biodiversity unit value of the scheme is likely to be significantly lower and consequently the overall losses of biodiversity will be greater than those calculated by HS2 Ltd. This is explored further in the discussion section of this report.

Table 3 provides an overview of NNL units generated pre- and post-construction. Identified field trees are included in this analysis. For completeness we have repeated the exercise excluding field trees and included the results in table 16 Appendix 5.

Source (scheme iteration)	Pre-construction				Post-construction			Summary			
	Area (ha)		NNL Biodiversity Units		Area (ha)	NNL Biodiversity Units		Reduction in number of area based NNL Biodiversity Units (%)		Overall net change in area based NNL Biodiversity Units	
	HS2	CWT	HS2	CWT		HS2	HS2	CWT	HS2	CWT	HS2
Phase 1 2017	6,775	6,787	22,059	26,285	6,777	20,484	20,102 ^{41,42}	-7.14	-23.52	-1,575	-6,183
Phase 1 2021 Q1	6,409	6,600	21,389	25,162	6,418 ⁴³	20,834	20,795 ⁴⁴	-2.60	-17.36	-555	-4,367
Phase 2a	2,979	2,977	7,887	11,428	2,973	6,545	6,537 ⁴⁵	-17.01	-42.80	-1,342	-4,891

Table 3 Route-wide summary of areas and NNL area-based biodiversity units generated pre- and post-construction. Field trees included.

Post-construction Phase 1 (2017 and 2021 Schemes)

Using the No Net Loss methodology we calculated a residual loss of -6,183 NNL units across the Phase 1 2017 scheme compared to a -1,575 loss calculated by HS2 Ltd. **Our assessment shows a -23.52% loss of NNL units compared to a -7.14% loss reported by HS2 Ltd; however, this is likely to be an underestimate due to the out of date methodology.**

Across the Phase 1 2021 scheme we calculated a residual loss of -4,367 NNL units compared to a -555 loss calculated by HS2 Ltd. **Our assessment shows a -17.36% loss of NNL units compared to a -2.60% loss reported by HS2 Ltd, however this is likely to be an underestimate due to the out of date methodology.**

These figures are not comparable with the losses and gains calculated for other developments using the Defra Biodiversity Metric 3.1 as the methodology utilised is very different. This is discussed further on page 13.

Post-construction Phase 2a

Using the No Net Loss methodology we calculated a residual loss of -4,891 NNL units across the Phase 2a scheme compared to a -1,342 loss calculated by HS2 Ltd. **Our assessment shows a -42.80% loss of NNL units compared to a -17.01% loss reported by HS2 Ltd, however this is likely to be an underestimate due to the out of date methodology.**

These figures are not comparable with the losses and gains calculated for other developments using the Defra Biodiversity Metric 3.1 as the methodology utilised is very different. This is discussed further on page 13.

HABITAT LOSSES AND GAINS

Table 4, Table 5 and Table 6 provide a breakdown of the residual losses of broad habitat types as a result of the HS2 scheme.

Broad habitat category	Pre-construction NNL units generated		Post-construction NNL units generated		Net Change NNL units	
	HS2	CWT	HS2	CWT	HS2	CWT
Woodland, scrub and field trees	4964.85	7458.77	4059.83	4044.94	-905.02	-3413.83
Grassland	9297.26	11623.33	11147.02	10,825.28	1849.76	-798.05
Other Habitat	7796.91	7202.48	5276.81	5231.47	-2520.10	-1971.01
Total	22059.02	26,284.58	20483.66	20,101.69 ^{46,47}	-1575.36	-6,182.89

Table 4 Net Change in NNL units by Broad Habitat (Phase 1 2017)

Broad habitat category	Pre-construction NNL units generated		Post-construction NNL units generated		Net Change NNL units	
	HS2	CWT	HS2	CWT	HS2	CWT
Woodland, scrub and field trees	4563.62	6997.20	4198.90	N/A data unreleased	-364.72	N/A data unreleased ⁴⁸
Grassland	9016.681	11497.29	11130.33	N/A data unreleased	2113.65	N/A data unreleased ⁴⁹
Other Habitat	7809.147	6667.03	5504.50	N/A data unreleased	-2304.65	N/A data unreleased ⁵⁰
Total	21389.45	25,161.52	20833.73	20,795.16 ⁵¹	-555.72	-4,366.36

Table 5 Net Change in NNL units by Broad Habitat (Phase 1 2021 Q1). The 2021 habitat breakdown data has not been reported by HS2 Ltd. as yet, therefore the figures were calculated using GIS data provided by HS2 Ltd.

Broad habitat category	Pre-construction NNL units generated		Post-construction NNL units generated		Net Change NNL units	
	HS2	CWT	HS2	CWT	HS2	CWT
Woodland, scrub and field trees	1317.10	2096.81	642.04	642.04	-675.06	-1454.77
Grassland	3660.78	6703.61	2986.27	2978.48	-674.51	-3725.13
Other Habitat	2908.73	2628.28	2916.53	2916.53	7.80	288.25
Total	7,886.61	11,428.70	6,544.84	6,537.05 ⁵²	-1,341.77	-4,891.65

Table 6 Net Change in NNL units by Broad Habitat (Phase 2a 2019).

Phase 1 (2017 scheme)

As shown in Table 4, throughout Phase 1 (2017 scheme) the majority of losses are from 'woodland, scrub and field trees' (-3413.83 NNL units) followed by the 'other habitats' broad habitat type (-1971.01). The 2017 Phase 1 scheme shows a net loss in NNL units of -798.05 across grassland broad habitats.

A detailed breakdown of broad habitats by distinctiveness value (included in Appendix 5 table 17) demonstrates there are net gains of woodland and scrub of medium distinctiveness (272.24 NNL units) but an overall net loss of high distinctiveness woodland NNL units (-3,717.48).

Net gains in high distinctiveness grassland habitats are reported across the 2017 Phase 1 scheme (1935.14 NNL units), compared to overall net losses of medium distinctiveness grassland (-1708.90 NNL units) and low distinctiveness grassland (-1,024.29 NNL units).

Across the 'other habitats' category there are net losses of high (-795.73 NNL units) and low (-1838.92 NNL units) distinctiveness habitats, compared to an overall net gain in medium distinctiveness habitats (663.63 NNL units).

Phase 1 (2021 scheme)

It is not possible to calculate the losses and gains for individual habitats across the 2021 Phase 1 scheme (Table 5) as the data is yet to be released by HS2 Ltd.

Phase 2a (2019 scheme)

As shown in Table 6, there are overall losses of woodland, scrub and field trees broad habitats (-1,452.77 NNL units) and overall losses of grassland broad habitats (-3725.13 NNL units). The 'other habitats' overall show gains across the scheme (288.25 NNL units).

A detailed breakdown of broad habitats by distinctiveness value (included in Appendix 5 table 18) demonstrates losses of high (-322.91 NNL units) and medium (-1138.06 NNL units) distinctiveness woodland and scrub, alongside gains in low distinctiveness woodland (6.20 NNL units).

Net gains in high distinctiveness grassland (422.28 NNL units) and losses in medium (-3863.74 NNL units) and low (-283.67 NNL units) distinctiveness grassland habitats are reported across the Phase 2a scheme.

Across the 'other habitats' category there are net gains of high (+346.89 NNL units) and medium (+542.98 NNL units) distinctiveness habitats, compared to net losses in low distinctiveness habitats (-601.62 NNL units).

These figures are not comparable with the losses and gains calculated for other developments using the government's Biodiversity Metric 3.1 as the methodology utilised is very different. This is discussed further on page 13.

Discussion of Key Issues (Area-based Habitats)

PRE-CONSTRUCTION

The habitat mapping and evaluation of habitat distinctiveness and condition undertaken by HS2 Ltd. was not of a quality we would expect from a large infrastructure project. We were particularly concerned with what appears to be a high number of digitising errors, suggesting the internal QA process at HS2 Ltd. is not effective. Also of significant concern were the apparent assumptions made by HS2 Ltd. when attributing habitat distinctiveness and condition values to habitat parcels.

Digitising and Mapping Errors

We identified a significant number of simple digitisation errors which we have largely corrected during our re-mapping exercise. These include, but are not limited to:

- Significant geometry errors in the scheme boundaries and habitat polygons.
- Poor quality digitisation leading to gaps, overlaps and slivers.
- Different No Net Loss boundaries with different areas.
- Pre and post construction area discrepancies.
- Inconsistencies between the area figures in the data provided by HS2 Ltd. and those published in its reports.
- Inconsistencies between the baseline area we calculated, and the baseline area calculated by HS2 Ltd.

Evaluating Existing Habitats

We also identified a significant number of issues with the way HS2 Ltd. allocated habitat distinctiveness⁵³ and condition values to individual habitat parcels. These include, but are not limited to:

- Areas identified as priority habitat on the Priority Habitat Inventory were frequently recorded as low or medium distinctiveness habitats.
- Significant areas of grassland were recorded as poor-semi-improved grasslands, including areas identified on the Priority Habitat Inventory and in locally designated wildlife sites.
- Open mosaic habitats on previously developed land were mapped according to their individual component habitats by HS2 Ltd. but numerous areas on the Priority Habitat Inventory were missed by HS2 Ltd and mapped as a single habitat.
- Significant areas of woodland identified on the Priority Habitat Inventory and in locally designated wildlife sites were allocated a medium distinctiveness and moderate condition score.
- Road verges were predominantly mapped as poor semi-improved grassland or amenity grassland, regardless of context.
- Ancient woodland mitigation was sometimes incorrectly identified and excluded from the baseline calculations.
- Areas that were compulsory purchased by HS2 Ltd. and subsequently left to re-naturalise are valued according to their previous distinctiveness and condition rather than using up to date habitat data.

- Significant numbers of field trees were excluded unless these were part of another habitat such as parkland.
- Trees in hedgerows are not accounted for by HS2 Ltd.
- Ponds located partially within the scheme are not fully accounted for, only the area within the scheme boundary was incorporated into the assessment.
- Numerous ponds, other waterbodies and watercourses (ditches and drains) are unaccounted for in the baseline mapping and are therefore excluded from the assessments.
- Habitat distinctiveness is not accounted for in the assessment of linear habitats.

The multiple and significant issues outlined above have resulted in an inaccurate No Net Loss baseline which underestimates the pre-construction biodiversity value of each of the HS2 schemes where data has been released.

We believe HS2 Ltd. has underestimated the pre-construction baseline of Phase 1 (2017 scheme) by at least 4,226 NNL units (17.48%).

We believe HS2 Ltd. has underestimated the pre-construction baseline of Phase 1 (2021 scheme) by at least 3,773 NNL units (16.21%).

We believe HS2 Ltd. has underestimated the pre-construction baseline of Phase 2a (2019 scheme) by at least 3,541 NNL units (36.67%).

Tables 17 and 18 of Appendix 5 highlights that the main differences are a result of:

- CWT identifying significantly more areas of high distinctiveness woodland and scrub in the Phase 1 footprint (2017 scheme); 399.78 ha compared to 230.32 ha identified by HS2 Ltd. In contrast, in Phase 2a we identified less high distinctiveness woodland and scrub than HS2 (68.37 ha compared to 80.14 ha).
- CWT identifying significantly more areas of medium distinctiveness grassland than HS2 in Phase 1 2017 (1,066.92 ha compared to 745.68 ha) and Phase 2a (548.73 ha compared to 260.90 ha).
- CWT identifying significantly more areas of 'other' high distinctiveness habitats in Phase 1 (2017 scheme); 94.34 ha compared to 21 ha identified by HS2 Ltd.

These results are based upon the No Net Loss methodology which attributes pre-construction habitat values differently to the Biodiversity Metric 3.1 methodology, therefore comparisons between the two should not be drawn. However, **it is clear that significantly undervaluing the existing biodiversity gives a false representation of what is required to meet the HS2 No Net Loss objective.**

POST-CONSTRUCTION

We did not amend the post-construction NNL unit values other than to correct obvious errors. This was limited to habitats where we observed that risk multipliers had been applied by HS2 Ltd. that were different to those published⁵⁴ and where no justification was provided for this difference. We did remove habitat distinctiveness and condition values attributed to buildings and built areas⁵⁵ so that the pre- and post-construction methodology was aligned. This was not done by HS2 Ltd., resulting in inconsistencies between pre- and post-construction methodology.

Despite questioning the feasibility⁵⁶ of creating certain habitats in particular locations, we did not amend the post-construction values for these habitat creation parcels unless there were unexplained changes to the HS2 Ltd. published risk multipliers as detailed above.

The following is a summary of the issues with the post-construction HS2 NNL data sets:

- HS2 Ltd. did not consistently use its published risk multipliers for all the post-construction calculations.
- HS2 Ltd. applied habitat distinctiveness and condition values inconsistently for habitats pre- and post-construction.

The HS2 NNL metric risk multipliers applied to mitigation habitats over-valued newly created habitats compared to current standards (this is discussed further on page 13) When we did correct errors in the application of risk multipliers or the distinctiveness values attributed to built-up areas, we found the post-construction calculations for both Phases 1 and 2a over-value post-construction biodiversity. This amounts to 382 NNL units in Phase 1 (2017 scheme), 39 NNL units in Phase 1 (2021 scheme) and 7.84 NNL units in Phase 2a.

On page 13 we analyse the implications of using the HS2 No Net Loss metric to measure losses and gains of biodiversity and particularly its potential to overvalue ecological compensation habitat. We explore why the post-construction NNL unit changes do not represent

the actual changes in biodiversity when measured by modern standards.

SUMMARY OF NO NET LOSS CALCULATIONS

The combination of significant mapping errors, poor digitisation misidentifying habitats and attributing incorrect values to habitats post-construction has led to a wide gap between the reported No Net Loss figures and what is likely to be a more accurate representation of No Net Loss provided by CWT.

Across Phase 1 (2017 scheme) we report a minimum -6,183 loss in NNL units (-23.52%) compared to a -1,575 loss (-7.14%) reported by HS2 Ltd. For Phase 1 (2021 scheme) our figures show a minimum -4,367 loss in NNL units (-17.36%) compared to -555 loss (-2.60%) reported by HS2 Ltd. For Phase 2a we report a minimum -4,891 loss in NNL units (-42.80%) compared to a -1,342 loss (-17.01%) reported by HS2 Ltd.

For Phase 1 (2021 scheme) these figures represent 7.9 times more biodiversity loss than that calculated by HS2 Ltd. For Phase 2a (2019 scheme) the figures represent 3.6 times more biodiversity loss than that calculated by HS2 Ltd. The figures we report are nevertheless considered to be significant underestimations due to the shortcomings of the outdated No Net Loss metric (discussed on page 13).

We observed that net losses of high distinctiveness woodland are not being compensated for by the creation of the same distinctiveness habitat, resulting in a residual loss of -3,413.83 NNL units across the 2017 Phase 1 scheme (no equivalent data is available for the 2021 scheme). On Phase 2a there is a residual loss of -322.91 high distinctiveness woodland NNL units and a residual loss of -1,138.06 medium distinctiveness woodland NNL units.

It is clear that progress towards the No Net Loss objective for area-based habitats is less advanced than HS2 Ltd. claim, with established woodland ecosystems most affected by the scheme.

Analysis of the Implications of using the HS2 No Net Loss Approach Compared to Current Industry Standards

OVERVIEW

In 2016 Natural England was asked by the government to report on differences between the High Speed 2 (HS2) No Net Loss (NNL) metric and the government's Biodiversity Offsetting pilot metric (2012). The 2016 report⁵⁷ concluded *'that the changes made by HS2 Ltd. to the Defra pilot metric have had more than a trivial impact on the calculation of NNL.'*

Since the 2016 review, HS2 Ltd has made further changes to its metric and assessment of No Net Loss to try and address some of the concerns flagged by Natural England. Updates in 2017 were mainly in relation to the removal of irreplaceable ancient woodland habitat and ancient woodland mitigation areas from the metric calculations. As far as we are aware, to date there have been no further updates for Phases 1 and 2a since 2017, despite the subsequent revisions of the government's pilot Biodiversity Metric culminating (to date) in the publication of the Biodiversity Metric version 3.1 in 2022.

There are several differences between the HS2 Ltd's No Net Loss metric and the government's current biodiversity metric (version 3.1). Four of these differences are particularly significant, meaning the two approaches are not comparable:

- The spatial location of a habitat in the landscape (strategic significance) is not accounted for by HS2 Ltd. which contrasts with the approach in Biodiversity Metric 3.1.
- The HS2 No Net Loss approach allows the loss of high distinctiveness habitat NNL units to be compensated for by the creation of different broad habitat types or by habitats of a lower distinctiveness (i.e. the No Net Loss approach does not inform the type of compensation required).
- Risk multiplier values and utilisation⁵⁸ are different in the two approaches.
- There is no recognition of habitat distinctiveness for linear habitats in the HS2 approach.

The first three differences are largely due to the early adaptations HS2 Ltd. made to the government's 2012 pilot Biodiversity Metric. The strategic significance value assessment was brought into the Defra Biodiversity Metric in 2019 to account for spatial location in the landscape. A habitat trading rule (known as like for like or better) was also introduced into the Defra Biodiversity Metric in 2019 meaning that the government's Biodiversity Metric does inform the type of compensation required.

These differences mean that the biodiversity units calculated using the HS2 No Net Loss metric (and therefore percentage losses and gains) are profoundly different and essentially incomparable to those calculated for other developments using the Defra Biodiversity Metric and current industry standards.

STRATEGIC SIGNIFICANCE

Since 2019 developments using the Defra Biodiversity Metric have accounted for the strategic significance of habitats by recognising that where habitats are located geographically contributes to their biodiversity unit value. The HS2 No Net Loss metric does not recognise strategic significance, meaning that habitat types are valued the same irrespective of where these sit in the landscape.

This key difference is a major source of concern for The Wildlife Trusts, particularly because in many locations the HS2 route significantly increases habitat fragmentation, thereby reducing ecological connectivity throughout the wider landscape. Negative impacts to ecological connectivity, through modern changes in land use, have already profoundly impacted the ability of many species to forage and successfully reproduce. Ensuring that HS2 Ltd. accounts for further habitat fragmentation is crucial.

By not incorporating a mechanism to account for strategic significance, the HS2 No Net Loss metric is highly likely to have led to a significant undervaluation of habitats in the pre-construction baseline.

USING A METRIC TO INFORM HABITAT COMPENSATION (LIKE FOR LIKE OR BETTER)

HS2 Ltd. has been very clear that its metric is intended only as an accounting tool and that it is not using the calculations to inform the provision of the appropriateness of compensatory habitat. This means that losses of medium and high distinctiveness habitats may be compensated for by the creation of lower distinctiveness habitats.

The results from Phase 1 have demonstrated that high distinctiveness broad-leaved semi-natural woodland is disproportionately affected and is not being fully compensated for with the provision of the same habitat, or a habitat of a higher value. The like for like or better rule of the current government metric is not being applied. The result of this is that many complex and well-developed semi-natural woodland ecosystems will be replaced with simplistic homogenous habitats throughout the scheme.

In 2016⁵⁹ Natural England reported *'In light of the wide-ranging issues that using the HS2 NNL metric as an accounting tool has presented, it is recommended that **for Phase 2 of the scheme a metric is applied for biodiversity offsetting purposes, i.e., a tool to inform compensation provision.** It is considered that this would be beneficial for the natural environment, for reporting purposes and for HS2 Ltd.'*

The HS2 No Net Loss calculations demonstrate that HS2 Ltd. have not taken on board these recommendations from Natural England and the No Net Loss metric is still not being used to inform compensation.

Supplementary Assessment 1 — Sensitivity Analysis of Habitat Creation

OVERVIEW

The HS2 No Net Loss metric was adapted from the Defra pilot metric which was first published in 2012. The results of these pilots, in addition to ongoing industry-led research and wide consultation enabled the government to further refine its biodiversity metric, with updated versions published in 2019, 2021 and 2022. These updated versions incorporate numerous iterative refinements from the pilot version including, but not limited to, changes to habitat distinctiveness values and the difficulty risk multipliers.

To examine the effect of implementing the risk multipliers and the habitat distinctiveness values used in the published versions of the Defra Biodiversity Metric 3.1, we have undertaken a sensitivity analysis⁶⁰ for woodland and grassland habitat creation (ecology-led). We acknowledge this is not the same as using the published Biodiversity Metric 3.1 to calculate losses and gains of these habitats and we also acknowledge that this sensitivity analysis does not apply to non-ecological habitat creation.

Habitats created with the primary purpose of providing ecological mitigation/compensation include ecological mitigation pond creation (K 1.4), woodland habitat creation (K 2.1), wetland habitat creation (K 2.2) and grassland habitat creation (K 2.3).

For this study we looked at woodland habitat creation (K 2.1) and grassland habitat creation (K 2.3) where there are differences associated with:

- The difficulty risk attributed to habitat creation.
- The distinctiveness value for grassland habitat creation.
- The time taken for a habitat to reach its target condition⁶¹.

These differences are set out in Table 7 below:

Ecological mitigation habitat ⁶²	HS2 metric			Defra Biodiversity Metric version 3.1		
	Habitat distinctiveness	Difficulty risk multiplier	Time to target condition multiplier	Habitat distinctiveness	Difficulty risk multiplier	Time to target condition multiplier
K2.1 Woodland	High (6)	Medium (0.67)	0.33 (32 years+)	High (6)	High (0.33)	0.32 (30 year+)
K2.3 Grassland	High (6)	Medium (0.67)	0.71 (10 years)	Very high (8)	High (0.33)	0.70 (10 years)

Table 7 Sensitivity Analysis of Woodland and Grassland Habitat Creation.

To illustrate the effect of adopting Defra's approach we used the areas of ecological habitat creation taken from the 2017 No Net Loss reports Phase 1 (2017) and Phase 2a (2019) and recalculated the units using habitat distinctiveness values and difficulty risk multipliers from the published versions of the Defra Biodiversity Metric (as set out in Table 7 above).

RESULTS

Habitat Creation	Distinctiveness	Condition	Difficulty	Time	Area (ha)	Woodland Units ⁶⁴	Grassland Units ⁶⁵
K2.1 Woodland (HS2)	6	2	0.67	0.33	165.80	439.90	-
K2.1 Woodland (Defra 3.1)	6	2	0.33	0.32	165.80	210.10	-
K2.3 Grassland (HS2)	6	2	0.67	0.71	401.90	-	2294.21
K2.3 Grassland (Defra 3.1)	8	2	0.33	0.70	401.90	-	1485.42
Reduced contribution to post-construction calculation compared to HS2 approach per habitat						-229.80	-808.79
Total reduced contribution to post-construction calculation compared to HS2 approach (combined woodland/grassland habitat creation)							-1038.59

Table 8 Effect of applying Defra's difficulty multipliers and distinctiveness values for the creation of K2.1 Woodland habitat creation and K2.3 Grassland habitat creation to HS2's No Net Loss post-construction assessment. Phase One (2017 data⁶⁵).

Habitat Creation	Distinctiveness	Condition	Difficulty	Time	Area (ha)	Woodland Units ⁶⁷	Grassland Units ⁶⁸
K2.1 Woodland (HS2)	6	2	0.67	0.33	157.21	417.11	-
K2.1 Woodland (Defra 3.1)	6	2	0.33	0.32	157.21	199.22	-
K2.3 Grassland (HS2)	6	2	0.67	0.71	202.75	-	1157.37
K2.3 Grassland (Defra 3.1)	8	2	0.33	0.70	202.75	-	749.36
Reduced contribution to post-construction calculation compared to HS2 approach per habitat						-217.89	-408.01
Total reduced contribution to post-construction calculation compared to HS2 approach (combined woodland/grassland habitat creation)							-625.90

Table 9 Effect of applying Defra's difficulty multipliers and distinctiveness values for the creation of K2.1 Woodland habitat creation and K2.3 Grassland habitat creation to HS2's No Net Loss post-construction assessment. Phase 2a (2019 data⁶⁶).

Phase 1 Woodland

The HS2 No Net Loss assessment⁶⁹ shows that 439.9 HS2 NNL biodiversity units are delivered through the creation of 165.8 ha of high distinctiveness woodland (habitat of principal importance). However, when applying the Defra Biodiversity Metric 3.1 risk multipliers, the same area of woodland creation would only deliver 210.10 biodiversity units, a difference of -229.8 biodiversity units.

Phase 2a Woodland

The HS2 No Net Loss assessment⁷⁰ shows that 417.11 HS2 NNL biodiversity units are delivered through the creation of 157.2 ha of high distinctiveness woodland (habitat of principal importance). However, when applying the Defra Biodiversity Metric 3.1 risk multipliers, the same area of woodland creation would only deliver 199.22 biodiversity units, a difference of -217.89 biodiversity units.

This simple analysis demonstrates the biodiversity value of ecological woodland habitat creation (K2.1, distinctiveness 6) reduces by more than half when the published Defra Biodiversity Metric 3.1 difficulty risk multipliers are applied.

Phase 1 Grassland

The HS2 No Net Loss metric assessment⁷¹ shows that 2294.21 HS2 NNL biodiversity units are delivered through the creation of 401.90 ha of high distinctiveness grassland. However, when applying the Defra Biodiversity Metric 3.1 risk multipliers and habitat distinctiveness values, the same area of grassland creation would only deliver 1485 units, a difference of -808.79 biodiversity units.

Phase 2a Grassland

The HS2 No Net Loss metric assessment⁷² shows that 1157.37 HS2 NNL biodiversity units are delivered through the creation of 202.75 ha of high distinctiveness grassland. However, when applying the Defra Biodiversity Metric 3.1 risk multipliers and habitat distinctiveness values, the same area of grassland creation would only deliver 749 units, a difference of -408.01 biodiversity units.

This simple analysis demonstrates the biodiversity value of the ecological grassland habitat creation (K2.3) reduces by more than a third when the published⁷³ Defra Biodiversity Metric difficulty risk multipliers and habitat distinctiveness values are applied.

SUMMARY OF HABITAT CREATION SENSITIVITY ANALYSIS

Our findings highlight a significant disparity between the number of units delivered by the HS2 No Net Loss metric and the Defra Biodiversity Metric 3.1 for ecological compensation habitats. We have found that the HS2 No Net Loss metric overvalues woodland which HS2 will create to compensate for the loss of existing species rich woods by at least half and overvalues ecological compensation grassland which HS2 will create to compensate the loss of existing species rich grassland by at least a third, compared to the current industry standard.

Supplementary Assessment 2 – Linear Habitats

HEDGEROWS AND LINES OF TREES

This assessment looks at how the HS2 No Net Loss metric evaluates existing and newly created hedgerows and compared this to the approach taken in the government's Biodiversity Metric 3.1 where there are differences associated with:

- The difficulty risk attributed to habitat creation.
- The distinctiveness value.
- The time taken for a habitat to reach its target condition.

These differences are set out in Table 10 below:

Hedgerow category	HS2 No Net Loss metric			Defra Biodiversity Metric 3.1		
	Habitat distinctiveness	Time to target condition multiplier (good)	Difficulty risk multiplier	Habitat distinctiveness	Time to target condition multiplier (good)	Difficulty risk multiplier
Native species-rich hedgerow with trees associated with bank or ditch	N/A	N/A	N/A	8	0.49 (20 yr)	1 (Low)
Native species-rich hedgerow with trees	N/A	0.71 (10 yr)	1 (Low)	6	0.49 (20 yr)	1 (Low)
Native species-rich hedgerow associated with bank or ditch	N/A	N/A	N/A	6	0.652 (12 yr)	1 (Low)
Native hedgerow with trees associated with bank or ditch	N/A	N/A	N/A	6	0.49 (20 yr)	1 (Low)
Native species-rich hedgerow ⁷⁴	N/A	0.71 (10 yr)	1 (Low)	4	0.652 (12 yr)	1 (Low)
Native hedgerow associated with bank or ditch	N/A	N/A	N/A	4	0.652 (12 yr)	1 (Low)
Native hedgerow with trees	N/A	0.71 (10 yr)	1 (Low)	4	0.49 (20 yr)	1 (Low)
Line of trees (Ecologically valuable)	N/A	N/A	N/A	4	0.32 (30 yr +)	1 (Low)
Line of trees (Ecologically valuable) with bank or ditch	N/A	N/A	N/A	4	0.32 (30 yr +)	1 (Low)
Native hedgerow	N/A	0.71 ⁷⁵ (10 yr)	1 (Low)	2	0.652 (12 yr)	1 (Low)
Line of trees	N/A	N/A	N/A	2	0.32 (30 yr +)	1 (Low)
Line of trees associated with bank or ditch	N/A	N/A	N/A	2	0.32 (30 yr +)	1 (Low)
Hedge ornamental non-native	N/A	N/A	N/A	1	N/A	1 (Low)

Table 10 Sensitivity Analysis of Hedgerow and Lines of Trees Creation.

For both approaches, the value of an existing hedgerow (pre-construction baseline) is calculated by multiplying length⁷⁶ by the distinctiveness value and multiplying again by condition value. For new hedgerows created post-construction, additional risk multipliers⁷⁷ are used to account for the difficulty of creation and the time taken to reach target condition.

In contrast to the government's Biodiversity Metric 3.1, the HS2 No Net Loss metric does not differentiate the distinctiveness value⁷⁸ for different types of hedgerows, meaning the value of an existing hedgerow is calculated using condition alone⁷⁹.

Under the HS2 No Net Loss approach new hedgerow creation has been attributed a good condition value (3), but pre-construction hedgerows have predominantly been attributed a moderate condition value (2).

The HS2 No Net Loss metric utilises a time to target condition of 10 years for hedgerow creation⁸⁰, whereas the Biodiversity Metric 3.1 utilises a time to target condition of 12 years for the equivalent hedgerow type.

The perverse consequence of using the HS2 No Net Loss metric means that many existing, well established mature native species-rich hedgerows⁸¹ have been valued lower⁸² than the new hedgerows due to be created by HS2 Ltd.

While we have not carried out a full sensitivity analysis on these differences, our observations lead us to believe there may be thousands of native species-rich hedgerows (often incorporating mature trees) within the footprint of HS2 Phases 1 and 2a which are not fully accounted for in the No Net Loss metric.

Hedgerows and Lines of Trees Summary

We have found that the methodology utilised by HS2 Ltd. (which is adapted from the now redundant government pilot metric) is too simplistic to capture the value of existing hedgerows (pre-construction baseline). We believe many hedgerows have been significantly undervalued in the baseline and overvalued in the post-construction assessments, particularly when the HS2 No Net Loss metric is compared to the government's Biodiversity Metric 3.1⁸³.

Unlike the government's Biodiversity metric 3.1, the HS2 No Net Loss metric outputs are disproportionately weighted in favour of new hedgerow creation and provide an inaccurate assessment of the overall impacts to the hedgerow network.

Hedgerows and Lines of Trees Recommendations

We concur with the recommendations of Natural England in 2016⁸⁴ that 'the distinctives of hedgerows pre- and post-construction should be assessed in line with current practice' (i.e., in line with the government's biodiversity metric).

It is recommended that hedgerow condition is assessed using the 'hedgerow condition assessment criteria' in line with the government's biodiversity metric, rather than using the outdated methodologies from the pilot metric or the FEP⁸⁵ (2010).

It is recommended that the time to target condition for native species-rich hedgerow creation in good condition is amended to 12 years in line with the government's biodiversity metric.

Where on-the-ground surveys of all hedgerows are impractical, we recommend that HS2 Ltd. capture available information from aerial imagery and maps and use it to inform hedgerow metrics, acknowledging that a simplified precautionary approach⁸⁶ is required because many attributes cannot be assessed from aerial imagery.

WATERCOURSES

Similar to hedgerows, the HS2 No Net Loss metric does not utilise habitat distinctiveness for watercourses meaning there is no differentiation between habitats such as rivers, streams or ditches with running water. The vast majority of watercourses within the footprint of the scheme have not been surveyed by HS2 Ltd. and have therefore been attributed a condition value of moderate (2) unless other information is available⁸⁷.

New watercourses (proposed to be created/reinstated) have been attributed the same condition value as existing watercourses (pre-construction baseline). The perverse consequences of not applying risk factors (difficulty or time to target condition) to watercourses is that any damage caused during the construction of the scheme is essentially unaccounted for in the metric. Instead, HS2 Ltd. is only accounting for the overall loss in length, which again is inconsistent with the Government's biodiversity metric and current practice.

Watercourses Recommendations

The distinctiveness of existing and new watercourses (pre- and post-construction) should be assessed in line with current practice (i.e. in line with the government's biodiversity metric).

The criteria used for condition assessment must be published and should be aligned with those of the government's Biodiversity Metric 3.1.

Post-construction risk multipliers must be utilised to account for the difficulty of creation/restoration and the time to target condition. The risk multipliers should be those used in the government's Biodiversity Metric 3.1.

Conclusion

Our review of the HS2 No Net Loss interim figures has highlighted that both the underpinning habitat data and No Net Loss methodology are fundamentally flawed. HS2's habitat mapping has a significant number of errors and there are major inconsistencies in the way data has been used to inform the calculations.

This has led to an under-valuation of area-based habitats in the HS2 pre-construction footprint of at least 4,226 NNL units (17.48%) in Phase 1 (2017), 3,773 NNL units (16.21%) in Phase 1 (2021) and 3,541 NNL units (36.67%) in Phase 2a (2019).

Particularly concerning is the inherent mischaracterisation or omission of certain habitats from baseline calculations, especially watercourses, hedgerows, field trees and ponds.

The HS2 No Net Loss metric is an adaptation of the government's 2012 pilot Biodiversity Metric and although some amendments were made to it following concerns raised by Natural England in 2016, it is evident that these have only been partially addressed in the current version of the HS2 No Net Loss metric. Nevertheless, we used the HS2 No Net Loss metric and demonstrated that HS2's calculations are inaccurate. **For Phase 1 (2021 scheme) No Net Loss calculations show at least a -17.36% loss of NNL units, whereas HS2 reported a -2.60% loss. For Phase 2a (2019 scheme) No Net Loss calculations show at least a -42.80% loss of NNL units, whereas HS2 reported a -17.01% loss. If the percentages were recalculated using Biodiversity Net Gain Units instead of outdated NNL units we think the actual percentage losses could be significantly higher.**

SENSITIVITY ANALYSIS

Natural England recommended in its review of the HS2 No Net Loss metric that when a published metric is adapted '*sensitivity analyses are conducted to evaluate the implications of any changes and the findings are published alongside the new metric's methodology*'.

Hs2 Ltd. has not published any sensitivity analyses of its No Net Loss metric. For this reason, it is not possible to understand the full implications of using an untested, adapted version of the pilot metric compared to using a version of the government's Biodiversity Metric 3.1. However, our own sensitivity analysis on ecology-led compensatory woodland and ecology-led compensatory grassland demonstrates a significant disparity between the HS2 No Net Loss approach and the approach in the government's Biodiversity Metric 3.1.

We have found that the HS2 No Net Loss metric overvalues ecological compensation woodland by at least a half and overvalues ecological compensation grassland by at least a third compared to the current industry standard metric.

Furthermore, we have found that losses of high distinctiveness woodland are being compensated for by lower distinctiveness habitats and the No Net Loss metric outcomes

are not being used to inform the type of compensation required. This approach is different to the habitat trading rules embedded into government's Biodiversity Metric 3.1

LINEAR HABITATS

We observed that compared to the approach taken in the government's Biodiversity Metric 3.1, hedgerows and watercourses are significantly overvalued in the HS2 No Net Loss post-construction calculations⁸⁸.

With regards to watercourses, we are very concerned that the HS2 No Net Loss metric only accounts for differences in length at the pre- and post-construction stage. As we have highlighted, the HS2 No Net Loss metric does not account for damage occurring as a result of construction. Neither does it take into account any risk factors⁸⁹ when watercourses are altered or reinstated.

SUMMARY

The HS2 No Net Loss metric is neither evidence-based nor was it consulted upon. This is in stark contrast to the government's Biodiversity Metric 3.1 which, over a period of at least 10 years, has been developed with the professional input of a wide range of practitioners and stakeholders. The Defra Biodiversity Metric represents current best practice and is an industry standard evidence-based tool.

For these reasons it is important that a distinction is drawn between HS2 No Net Loss outcomes and outcomes for other contemporary developments where the government's Biodiversity Metric 3.1 has been used.

Due to a fundamental lack of transparency, it has taken four years for the extent of the issues to finally be recognised. Publishing the No Net Loss figures years in advance of releasing the supporting datasets has denied the opportunity for proper review and independent scrutiny. This lack of transparency is contradictory to HS2's core values⁹⁰ of fairness, transparency and consistency.

In conclusion the HS2 No Net Loss figures released in 2017, 2019 and 2021 are wholly unreliable. These are based upon poor quality data riddled with inaccuracies and rely on an untested assessment methodology that is subject to little independent scrutiny and no independent quality assurance⁹¹. The way in which HS2 Ltd. is publishing and communicating its No Net Loss percentage figures is highly misleading.

We recommend that the whole assessment should be repeated using a methodology that is directly comparable to the government's Biodiversity Metric 3.1. If changes to the methodology are made these should be 'transparent and evidence based' as highlighted by Natural England in its 2016 review⁹².

Finally, we hope that the flawed, untested methodology used to assess HS2's impacts on biodiversity does not set a precedent for other large-scale infrastructure projects.

Recommendations

- We recommend HS2 Ltd. re-map and re-assess the pre-construction area-based and linear habitats for Phases 1 and 2a, correcting mapping errors, ensuring no habitats are excluded and attributing appropriate distinctiveness and condition values.
- We also recommend that the losses and gains in biodiversity are assessed using a quality assured version⁹³ of the most up-to-date Biodiversity Metric (currently version 3.1), not an adapted version of a metric that is approximately 10 years out of date.
- In any updated assessment HS2 Ltd. must use the government's Biodiversity Metric habitat trading rules as a guide to help inform the levels of compensatory habitat.
- It is critical that HS2 Ltd. ensure all data is made publicly available at the point the figures are released to facilitate transparency and enable independent scrutiny.

Our research has shown the figures for No Net Loss presented by HS2 Ltd. are fundamentally flawed. The entire No Net Loss process is far removed from the scheme's core values⁹⁴ of acting fairly, transparently and consistently. We are calling on the Government to respond swiftly to our findings, while there is still time to change the scheme's design and delivery.

Appendix 1 — Methodology

The methodology we used for our calculations followed those published by HS2 Ltd., however additional explanatory details are provided below:

- Historical aerial imagery dated as closely as possible to the original survey of each phase of HS2 were utilised for comparisons.
- Priority Habitats (Habitats of Principal Importance) were checked against aerial photography before assigning a distinctiveness value of high (6).
- Coastal and floodplain grazing marsh was assigned a distinctiveness value of high (6) but given a condition value of poor (1) unless HS2 Ltd. had undertaken a condition assessment (according to the guidance published in FEP⁹⁵).
- Low (2) distinctiveness habitats were assigned a poor (1) condition value.
- Ponds were assigned a distinctiveness and condition value using HS2 No Net Loss data⁹⁶, or (where HS2 Ltd. data was not available) using protected species data to determine distinctiveness and HS2 guidance for condition scoring⁹⁷.
- In order to avoid bisecting ponds where these straddled or touched the scheme boundary these were split out from the dataset and any ponds within or bisecting the GIS boundary were retained then added back into the dataset. Any large waterbodies that were over 2 ha (defined as a lake by the Freshwater Habitats Trust) were treated the same as other habitat polygons and cropped to the boundary to avoid skewing the area.
- Habitats with a high (6) or medium (4) distinctiveness value that were located within a Local Wildlife Site were assigned good (3) condition. Potential Wildlife Sites were identified but did not receive a higher condition value.
- Ancient woodland, ancient woodland mitigation areas and watercourses were assigned a biodiversity value of Null (0) and excluded from the area based NNL unit calculations.

Appendix 2 — Datasets

HS2 GIS FILES USED FOR PHASE 1 CALCULATIONS

Boundaries:

- HS2_LD_ConsolidatedLandBoundary_Ply_AP05

Habitat data:

- ENV_HSTWO_NNL_PreConstruction_Ply (2017)
- ENV_HSTWO_NNL_PreConstruction_Ln (2017)
- ENV_HSTWO_NNL_PostConstruction_Ply (2017)
- ENV_HSTWO_NNL_PostConstruction_Ln (2017)
- ENV_HSTWO_NNL_PreConstruction_Ply (2021 Q1)
- ENV_HSTWO_NNL_PreConstruction_Ln (2021 Q1)
- ENV_HSTWO_NNL_PostConstruction_Ply (2021 Q1)
- ENV_HSTWO_NNL_PostConstruction_Ln (2021 Q1)
- ENV_ARP_C250_Phase1Habitats_Pt_ES (November 2013)
- ENV_ARP_C250_AmphibiansPondSurvey_GCN_Pt_ES
- ENV_ARP_C250_Pond_Survey_Pt_ES
- ENV_ARP_C250_Amphibians_GCNWaterbodies50m_Ply_ES

HS2 GIS FILES USED FOR PHASE 2A CALCULATIONS

Boundaries:

- HS2_LD_ConsolidatedLandBoundary_Ply_HB01 (Oct 2017)
- CON_CN_ConsolidatedConstructionBoundary_Ply_CT05_HB01 (Oct 2017)
- CON_CN_ConsolidatedConstructionBoundary_AdditionalPlanting_Ply_CT05_HB01 (Oct 2017)

Habitat data:

- ENV_ARP_2PT02_NNL_PreConstruction_Ply (Q4 2018)
- ENV_ARP_2PT02_NNL_PreConstruction_Ln (Q4 2018)
- ENV_ARP_2PT02_NNL_PostConstruction_Ply (Q4 2018)
- ENV_ARP_2PT02_NNL_PostConstruction_Ln (Q4 2018)
- ENV_HSTWO_EC_Phase1Habitats_Pt_AP02 (Environmental Topics 2019)
- ENV_ARP_C861_EC_AmphibiansPondSurvey_GCN_Pt_AP01 (Environmental Topics 2018)
- ENV_ARP_C861_EC_WaterVole_Survey_Extent_Ply_AP01 (Environmental Topics 2018)
- ENV_ARP_C861_EC_Otter_Location_Pt_AP01 (Environmental Topics 2018)

Dataset	Habitat	Source
Ancient Woodland (England) - Natural England	Ancient Woodland	https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england
Priority Habitat Inventory (England) - Natural England	Coastal and floodplain grazing marsh Good quality semi-improved grassland Lowland meadows Purple moor grass and rush pastures Woodland / Deciduous	https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england
Open Mosaic Habitat (Draft) - Natural England	Open Mosaic Habitats / Brownfield	https://data.gov.uk/dataset/8509c11a-de20-42e8-9ce4-b47e0ba47481/open-mosaic-habitat-draft
Wood Pasture and Parkland (England) - Natural England	Parkland	https://data.gov.uk/dataset/bac6feb6-8222-4665-8abe-8774829ea623/wood-pasture-and-parkland-england
Traditional Orchards HAP (provisional) (England) - Natural England	Traditional Orchard	https://data.gov.uk/dataset/1c8d4150-0126-4bf2-b697-a93a07007510/traditional-orchards-hap-provisional-england
National Forest Inventory Woodland England - Forestry Commission	Woodland / Broadleaved	https://data.gov.uk/dataset/ae33371a-e4da-4178-a1df-350ccfcc6cee/national-forest-inventory-woodland-england-2015

Table 11 National datasets used by CWT

Appendix 3 — Habitat Distinctiveness

Distinctiveness	Habitat types included	Weighting
High	Habitats of principal importance i.e., those which meet the criteria qualify as habitats of principal importance.	6
Medium	Semi-natural habitats that do not fall within the scope of habitats of principal importance definitions, including: <ul style="list-style-type: none"> • All areas of woodland and semi-natural grassland that do not qualify as a habitat of principal importance e.g., non-native coniferous plantation or species poor semi-improved grassland), • Uncultivated field margins. • Road verge and railway embankments (excluding those that are intensively managed). 	4
Low	Habitats including: <ul style="list-style-type: none"> • Improved grassland. • Arable fields (excluding any uncultivated margins). • Built up areas. • Domestic gardens, • Regularly disturbed bare ground (e.g., quarry floor, landfill sites etc.). • Intensively managed verges associated with transport corridors. 	2

Table 12 Habitat types and their respective distinctiveness and weighting.

CWT Habitat	UK Habitat Classification equivalent	Phase One (HS2) Habitat equivalent	CWT		HS2	
			Distinctiveness	Condition	Distinctiveness	Condition ⁹⁸
Ancient Woodland	Irreplaceable	Irreplaceable	0	0	0	0
Arable	Cropland – cereal crops	J1.1 Cultivated/disturbed land – arable	2	1	2	1
Arable – uncultivated field margins	Cropland – arable field margins	J1.1 Cultivated/disturbed land – arable (uncultivated field margin)	4	2	4	2
Bare ground	Urban – vacant/derelict land/bare ground	J4 Bare ground	2	1	2	1
Bracken – continuous	Grassland – Bracken	C1.1 Bracken – continuous	2	1	2	1
Ephemeral/short perennial	Sparsely vegetated land – ruderal/ephemeral	J1.3 Cultivated/disturbed ground – ephemeral/short perennial (based on species)	2	1	4/2	2/1
Fen	Wetland – Fens (upland and lowland)	E3 Fen (Priority habitat)	6	2	6	2
Grassland/Acid Semi-improved (non-priority)	Grassland – other lowland acid grassland	B1.2 Acid grassland – Semi-improved	6	2	6	2
Grassland/Amenity	Grassland – Modified Grassland	J1.2 Cultivated/disturbed ground – amenity grassland	2	1	2	1
Grassland/Calcareous	Grassland – Lowland Calcareous grassland	B3.1 Calcareous grassland unimproved	6	2	6	2
Grassland/Coastal and floodplain grazing marsh	Grassland – Floodplain Wetland Mosaic	B5 Marshy grassland (priority habitat)	6	1	6	2

Cont.

CWT Habitat	UK Habitat Classification equivalent	Phase One (HS2) Habitat equivalent	CWT		HS2	
			Distinctiveness	Condition	Distinctiveness	Condition
Grassland/Good quality semi-improved	Grassland – Lowland meadows	B2.2 Neutral grassland – Semi-improved (priority habitat)	6	2	6	2
Grassland/Improved	Grassland – Modified grassland	B4 Improved grassland	2	1	2	1
Grassland/Lowland meadows	Grassland – Lowland meadow	B2.1 Neutral grassland – Unimproved	6	2	6	2
Grassland/Lowland Calcareous	Grassland – Lowland Calcareous grassland	B3.1 Calcareous grassland unimproved/semi-improved good quality	6	2	6	2
Grassland/Marshy (non-priority)	Grassland - Other neutral grassland (Marshy)	B5 Marshy grassland	4	2	4	2
Grassland/Neutral semi-improved (non-priority)	Grassland – other neutral grassland	B2.2 Neutral grassland – Semi-improved	4	2	4	2
Grassland/Neutral unimproved	Grassland – Lowland meadow	B2.1 Neutral grassland – Unimproved	6	2	6	2
Grassland/Poor semi-improved	Grassland – other neutral grassland (Species Poor)	B6 Poor semi-improved grassland	4	2	4	2/1
Hardstanding/Buildings	Urban – developed land; sealed surface	J3.6 Buildings	0	0	0	0
Horticulture	Cropland – Horticulture	J1.4 Cultivated/disturbed ground – introduced shrub	2	1	2	1
Introduced shrub	Urban – Introduced shrub	J1.4 Cultivated/disturbed ground – introduced shrub	2	1	2	1
Lowland fens	Wetland – Fens (lowland)	E3 Fen	6	2	6	2
Lowland heathland	Heathland and shrub – Lowland heathland	D1 Dry dwarf shrub heath	6	2	6	2
Marginal Vegetation (non-priority)	**Various** Habitat type feature is within	F2.1 Marginal and inundation – marginal vegetation	4	2	4	2
Open Mosaic Habitats on previously developed ground	Urban – Open Mosaic Habitats on Previously Developed Land	J1.3 Cultivated/disturbed ground – ephemeral/short perennial (on open mosaic priority habitat)	6	2	6	2
Other habitat/allotment	Urban – Allotment	J.5 Other habitat	2	1	2	1
Other habitat/disturbed ground	Sparsely vegetated land – Ruderal/Ephemeral	J1.3 Cultivated/disturbed ground – ephemeral/short perennial (non-priority)	2	1	4/2	2/1

Cont.

CWT Habitat	UK Habitat Classification equivalent	Phase One (HS2) Habitat equivalent	CWT		HS2	
			Distinctiveness	Condition	Distinctiveness	Condition
Other habitat/ railway embankment	Grassland – other neutral grassland	B6 Poor semi-improved grassland	4	2	4	2/1
Other habitat/ road verge	Grassland – other neutral grassland	B6 Poor semi-improved grassland	4	2	4	2/1
Other habitat/ track	Urban – vacant/ derelict land/bare ground	J4 – Bare ground	2	1	2	1
Other habitat/ vegetated garden	Urban – vegetated garden	J1.2/4 Cultivated/ disturbed ground – amenity grassland/ introduced shrub	2	1	2	1
Parkland/ Scattered trees (non-priority)	Woodland and forest – Wood-pasture and Parkland	A3.1 Parkland/scattered trees – Broad-leaved	4	2	4	2
Purple moor grass and rush pastures	Wetland – Purple moor grass and rush pastures	B5 – Marshy grassland (priority habitat)	6	2	6	2
Quarry	Quarry – hard rock/ soft sand	I2.1 – Quarry (based on habitats present)	2	1	4/2	2/1
Reedbeds (priority habitat)	Wetland – Reedbeds	F1 Swamp	6	2	6	2
Running water	Linear Feature: Rivers and Streams	G2 Running water	0	0	0	0
Scrub – dense continuous	Heathland and shrub – mixed scrub	A2. 1 Scrub – dense/ continuous ⁹⁹	4	2	4	2
Standing Water/ Pond	Lakes – Ponds (Non-Priority Habitat)	G1 – Standing water (non-priority habitat) ¹⁰⁰	4	1/2	4	1/2
Standing Water/ Pond	Lakes – Ponds (Priority Habitat)	G1 – Standing water (priority habitat)	6	1/2	6	1/2
Tall ruderal	Sparsely vegetated land – ruderal/ ephemeral	C3.1 Tall ruderal	2	1	2	1
Traditional Orchard	Grassland – Traditional Orchards	A1.3.2 Mixed woodland – plantation (Traditional orchard priority habitat)	6	2	6	2
Urban trees	Urban – Urban trees	A1.3.2 Mixed woodland – plantation	4	2	4	2
Woodland/ Broadleaved	Woodland and forest – other woodland; broadleaved	A1.1 Broadleaved woodland	4	2	4	2
Woodland/ Broadleaved Plantation (non-priority)	Woodland and forest – other woodland; broadleaved	A1.1.2 Broadleaved woodland – plantation	4	2	4	2
Woodland/ Broadleaved Semi-natural	Woodland and forest – lowland mixed deciduous woodland	A1.1.1 Broadleaved woodland – semi-natural	6	2	6	2

Cont.

CWT Habitat	UK Habitat Classification equivalent	Phase One (HS2) Habitat equivalent	CWT		HS2	
			Distinctiveness	Condition	Distinctiveness	Condition
Woodland/Coniferous (non-priority)	Woodland and forest – other woodland; Scots Pine	A1.2.2 Coniferous woodland – plantation	4	2	4	2
Woodland/Coniferous Plantation (non-priority)	Woodland and forest – other woodland; Scots Pine	A1.2.2 Coniferous woodland – plantation	4	2	4	2
Woodland/Deciduous	Woodland and forest – lowland mixed deciduous woodland	A1.1.1/3 Broadleaved or Mixed woodland – semi-natural (priority habitat)	6	2	6	2
Woodland/Felled	Woodland and forest – felled	A4.1 – Broadleaved woodland – recently felled	4	2	4	2
Woodland/Mixed (non-priority)	Woodland and forest – other woodland; mixed	A1.3.1 Mixed woodland – semi-natural	4	2	4	2
Woodland/Scrub (transition habitat/difficult to distinguish on aerial imagery)	Woodland and forest/Heathland and shrub – mixed scrub	A1.1 Broadleaved woodland/A2.1 Scrub – dense/continuous	4	2	4	2
Woodland/Young trees	Woodland and forest – other woodland; broadleaved	A1.1.2 Broadleaved woodland – plantation	4	2	4	2
Wood Pasture and Parkland	Woodland and forest – Wood-pasture and Parkland	A3.1 Broadleaved parkland/scattered trees (wood pasture parkland priority habitat)	6	2	6	2

Table 13 HS2 and CWT guidelines applied to habitat distinctiveness and condition scores (HS2 No Net Loss methodology).

Appendix 4 — Post-Construction Risk Multipliers

Post Construction – Habitats which are assigned each difficulty rating						
Low (1.00)		Medium (0.67)		High (0.33)		
Scrub – dense continuous		Broadleaved woodland – semi-natural		Wet heath		
Scrub – scattered		Broadleaved woodland – plantation		Upland flushes,		
Improved Grassland		Coniferous woodland – plantation		Swamps		
Poor semi-improved grassland		Mixed woodland – semi-natural		Purple moor grass and rush pastures		
Tall ruderal		Mixed woodland – plantation		Fens		
Standing Water/Pond		Acid grassland – semi-improved				
Arable		Neutral grassland – unimproved				
Amenity Grassland		Neutral grassland – semi-improved				
		Marshy grassland				
		Marginal vegetation				
Post Construction – Compensatory habitats which are assigned a difficulty rating						
Low (1.00)		Medium (0.67)				
Habitat	Distinctiveness	Condition	Habitat	Distinctiveness	Condition	
K1.4 – Ecological mitigation	6	2	K1.2 – Balancing pond	4	2	
K2.6 – Grassed areas (primary purpose = landscape & visual)	2	1	K2.1 – Woodland habitat creation	6	2	
K4.2 – Depot, station, headhouse or portal building	2	1	K2.2 – Wetland habitat creation	6	2	
K4.4 – Electricity substation	2	1	K2.3 – Grassland habitat creation	6	2	
K5.3 – Engineering earthworks	2	1	K2.4 – Landscape mitigation planting (primary purpose = landscape & visual)	4	2	

Table 14 HS2 Post-Construction Difficulty Risk Multipliers

Number of Years	Habitat	Distinctiveness	Condition
0 year (1)	G1 – Standing water	4	1
	G1 – Standing water	4	2
	J1.1 – Cultivated/disturbed land – arable	2	1
	J1.4 – Introduced shrub	2	1
	J3.6 – Buildings	2	1
	J4 – Bare ground	2	1
	K4.2 – Depot, station, headhouse or portal building	2	1
	K4.4 – Electricity substation	2	1
1 year (0.97)	B4 – Improved grassland	2	1
	J1.3 – Cultivated/disturbed land – ephemeral/short perennial	2	1

Cont.

Number of Years	Habitat	Distinctiveness	Condition
2 years (0.93)	C3.1 – Other tall herb and fern – ruderal	2	1
	J1.2 – Cultivated/disturbed land – amenity grassland	2	1
	K2.6 – Grassed areas (primary purpose = landscape & visual)	2	1
5 years (0.84)	A2.2 – Scrub – scattered	2	1
	B6 – Poor semi-improved grassland	4	1
	B6 – Poor semi-improved grassland	4	2
	B6 – Poor semi-improved grassland	6	1
	C1.1 – Bracken – continuous	2	1
	C1.2 – Bracken – scattered	2	1
	F2.2 – Marginal and inundation – inundation vegetation	6	N/A
	J5 – Other habitat	0	1
	K1.2 – Balancing pond	4	1
	K1.4 – Ecological mitigation pond	6	2
10 years (0.71)	K5.3 – Engineering earthworks	2	1
	A1.1.2 – Broadleaved woodland – plantation	4	1
	A1.1.2 – Broadleaved woodland – plantation	4	2
	A1.2.2 – Coniferous woodland – plantation	4	1
	A1.2.2 – Coniferous woodland – plantation	4	2
	A1.3.2 – Mixed woodland – plantation	4	2
	A2.1 – Scrub – dense/continuous	4	2
	B1.2 – Acid grassland – semi-improved	6	1
	B1.2 – Acid grassland – semi-improved	6	2
	B2.1 – Neutral grassland – unimproved	6	1
	B2.1 – Neutral grassland – unimproved	6	2
	B2.2 – Neutral grassland – semi-improved	4	1
	B2.2 – Neutral grassland – semi-improved	4	2
	B2.2 – Neutral grassland – semi-improved	6	1
	B2.2 – Neutral grassland – semi-improved	6	2
	B5 – Marsh/marshy grassland	4	1
	B5 – Marsh/marshy grassland	4	2
10 years (0.71)	B5 – Marsh/marshy grassland	6	1
	B5 – Marsh/marshy grassland	6	2
	K2.2 – Wetland habitat creation	6	2
32 years (0.33)	K2.3 – Grassland habitat creation	6	2
	K2.4 – Landscape mitigation planting (primary purpose = landscape & visual)	4	2
	A1.1.1 – Broadleaved woodland – semi-natural	6	1
32 years (0.33)	A1.1.1 – Broadleaved woodland – semi-natural	6	2
	A1.3.1 – Mixed woodland – semi-natural	4	2
	A3.1 – Broadleaved parkland/scattered trees	4	1
	A3.1 – Broadleaved parkland/scattered trees	4	2
	K2.1 – Woodland habitat creation	6	2

Table 15 HS2 Ltd. post-construction time to target condition and risk multipliers

Appendix 5 — Route-wide summary of areas and NNL biodiversity units

Source	Pre-construction				Post-construction			Summary			
	Area (ha)		NNL Biodiversity Units		Area (ha)	NNL Biodiversity Units		Reduction in number of area based NNL Biodiversity Units (%)		Overall net change in area based NNL Biodiversity Units	
	HS2	CWT	HS2	CWT		HS2	HS2	CWT	HS2	CWT	HS2
Phase 1 2017 Baseline	6,775	6,787	22,059	25,450	6,777	20,484	20,102 ^{101,102}	-7.14	-21.01	-1,575	-5,348
Phase 1 2021 Q1	6,409	6,600	21,389	24,339	6,418 ¹⁰³	20,834	20,795 ¹⁰⁴	-2.60	-14.56	-555	-3,544
Phase 2a	2,979	2,977	7,887	10,652	2,973	6,545	6,537 ¹⁰⁵	-17.01	-38.63	-1,342	-4,115

Table 16 Route-wide summary of areas and NNL area-based biodiversity units generated pre- and post-construction. Field trees excluded.

Habitat category (distinctiveness weighting)	Pre-Construction (HS2)		Pre-Construction (CWT)		Post-Construction (HS2)		Post-Construction (CWT)		Summary (HS2)		Summary (CWT)	
	Area (ha)	Area-based NNL biodiversity units generated	Area (ha)	Area-based NNL biodiversity units generated	Area (ha)	Area-based NNL biodiversity units generated	Area-based NNL biodiversity units generated	Area-based NNL biodiversity units generated	Net change in area (ha)	Net change in area based NNL biodiversity units	Net change in area (ha)	Net change in area based NNL biodiversity units
Woodland & scrub (6)	230.32	3055.47	399.78	4841.53	309.74	1138.94	1124.05	79.42	-1916.53	-90.04	-3,717.48	
Woodland & scrub (4) including field trees	230.73	1847.74	222.69	2617.24	729.57	2889.48	2889.48	498.84	1041.74	506.88	272.24	
Woodland & Scrub (2)	30.82	61.64	0.00	0.00	18.70	31.41	31.41	-12.12	-30.23	18.70	31.41	
Woodland & Scrub (0)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Woodland & Scrub (NULL) ¹⁰⁷	75.87	0.00	68.39	0.00	203.79	0.00	0.00	127.93	0.00	135.40	0.00	
Grassland (6)	71.93	1003.12	69.87	688.68	447.68	2623.82	2623.82	375.76	1620.70	377.81	1935.14	
Grassland (4)	745.68	5826.92	1066.92	8555.76	1049.95	7168.60	6846.86	304.27	1341.68	-16.97	-1,708.9	
Grassland (2)	1233.61	2467.22	1189.45	2378.89	701.56	1354.60	1354.60	-532.05	-112.62	-487.89	-1024.29	
Grassland (0)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Grassland (NULL) ¹⁰⁸	63.75	0.00	82.49	0.00	8.00	0.00	0.00	-55.75	0.00	-74.49	0.00	
Other habitats (6)	21.09	300.74	94.34	1205.32	52.81	409.59	409.59	31.71	108.85	-41.53	-795.73	
Other habitats (4)	86.26	700.97	40.09	324.23	154.97	987.86	987.86	68.71	286.89	114.88	663.63	
Other habitats (2)	3397.60	6795.20	2836.47	5672.94	2006.92	3879.36	3834.02 ¹⁰⁹	-1390.68	-2915.84	-829.55	-1838.92	
Other habitats (0)	506.75	0.00	659.33	0.00	1084.59	0.00	0.00	577.84	0.00	425.26	0.00	
Other habitats (NULL) ¹¹⁰	80.41	0.00	57.33	0.00	8.23	0.00	0.00	-72.19	0.00	-49.10	0.00	
Totals	6774.81	22059.02	6787.15	26,284.59	6776.51	20483.66	20101.69	1.70	-1575.36	-10.64¹¹¹	-6,182.90	

Table 17 Habitat Polygons: Area based Biodiversity Units for Phase One – directly comparable to HS2 2017 figures

Habitat category (distinctiveness weighting)	Pre-Construction (HS2)		Pre-Construction (CWT)		Post-Construction (HS2)		Post-Construction (CWT)		Summary (HS2)		Summary (CWT)	
	Area (ha)	Area-based>NNL biodiversity units generated	Area (ha)	Area-based>NNL biodiversity units generated	Area (ha)	Area-based>NNL biodiversity units generated	Area (ha)	Area-based>NNL biodiversity units generated	Net change in area biodiversity (ha)	Net change in area based>NNL biodiversity units	Net change in area biodiversity (ha) ¹²	Net change in area based>NNL biodiversity units
Woodland & scrub (6)	80.14	987.03	68.37	865.13	205.86	542.22	542.22	542.22	125.72	-444.81	137.49	-322.91
Woodland & scrub (4) including field trees	42.25	317.53	56.09	1230.63	23.43	92.57	92.57	92.57	-18.82	-224.96	-32.66	-1138.06
Woodland & Scrub (2)	6.27	12.54	0.52	1.05	4.32	7.25	7.25	7.25	-1.96	-5.29	3.80	6.20
Woodland & Scrub (0)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Woodland & Scrub (NULL) ¹³	30.58	0.00	53.43	0.00	95.58	0.00	0.00	0.00	65.00	0.00	42.15	0.00
Grassland (6)	45.86	460.77	65.00	805.81	218.42	1228.09	1228.09	1228.09	172.57	767.32	153.42	422.28
Grassland (4)	260.90	1536.47	548.73	4460.52	130.97	596.78	596.78	596.78	-129.93	-939.69	-417.76	-3863.74
Grassland (2)	831.77	1663.54	718.64	1437.28	623.68	1161.40	1161.40	1153.61 ¹⁴	-208.09	-502.13	-94.96	-283.67
Grassland (0)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grassland (NULL) ¹⁵	39.16	0.00	56.13	0.00	3.45	0.00	0.00	0.00	-35.71	0.00	-52.68	0.00
Other habitats (6)	5.82	71.90	7.42	101.27	69.46	448.16	448.16	448.16	63.64	376.26	62.04	346.89
Other habitats (4)	9.62	76.57	17.30	139.60	166.14	682.58	682.58	682.58	156.51	606.01	148.84	542.98
Other habitats (2)	1380.13	2760.26	1193.71	2387.41	898.62	1785.79	1785.79	1785.79	-481.51	-974.47	-295.09	-601.62
Other habitats (0)	205.73	0.00	174.93	0.00	409.98	0.00	0.00	0.00	204.25	0.00	235.05	0.00
Other habitats (NULL) ¹⁶	40.34	0.00	16.24	0.00	127.76	0.00	0.00	0.00	87.42	0.00	111.52	0.00
Totals	2978.57	7886.61	2976.51	11,428.07	2977.67	6544.84	6537.05	6537.05	-0.91	-1341.76	1.16	-4891.65

Table 18 Habitat Polygons: Area based Biodiversity Units for Phase 2a – directly comparable to HS2 2019 figures

References

- 1 As identified in the No Net Loss of biodiversity data released by HS2 Ltd. in 2017, 2019, 2021
- 2 Independent quality assurance is recommended by Natural England in 'NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric'.
- 3 The No Net Loss approach seeks to balance the impacts on biodiversity so that the outcome is neutral.
- 4 In 2012 the government's National Planning Policy Framework first stated that sustainable development involved 'moving from a net loss of bio-diversity to achieving net gains for nature'
- 5 Geographical Information Systems
- 6 Excluding linear hedgerows and watercourses
- 7 HS2 No Net Loss (NNL) Biodiversity units are calculated using the size of the habitat and its quality. The government's Defra Biodiversity Units are calculated using the size of the habitat, its quality and location.
- 8 Biodiversity Metric 3.1 User Guide, Natural England 2022
- 9 Adapted in 2012 with further adaptations in 2017 following the 2016 review by Natural England.
- 10 HS2 London-West Midlands. No Net Loss in biodiversity calculation- Methodology and Results (2017 baseline) and HS2 No Net Loss in biodiversity calculation – Methodology and Results 2019
- 11 Habitat distinctiveness is a measure of habitat quality. Habitats that are scarce or declining typically score highly relative to habitats that are more common and widespread. HS2 utilise four categories, high, medium, low and very low distinctiveness. All Habitat of Principal Importance (Priority Habitat) is high distinctiveness, semi-natural habitat is generally medium distinctiveness, significantly modified habitats are low distinctiveness and developed areas are very low distinctiveness. Details in Appendix 3, tables 12 and 13.
- 12 Habitat condition is a score of the biodiversity value of the habitat relative to others of the same type
- 13 HS2 London-West Midlands. No Net Loss in biodiversity calculation- Methodology and Results (2017 baseline) and HS2 No Net Loss in biodiversity calculation – Methodology and Results 2019
- 14 HS2 London-West Midlands. No Net Loss in biodiversity calculation- Methodology and Results (2017 baseline) and HS2 No Net Loss in biodiversity calculation – Methodology and Results 2019
- 15 Risk multipliers were not used
- 16 The reason for not accounting for risk is unclear and no explanation is provided.
- 17 HS2 London-West Midlands. No Net Loss in biodiversity calculation- Methodology and Results (2017 baseline) and HS2 No Net Loss in biodiversity calculation – Methodology and Results 2019
- 18 Appendix 2
- 19 Appendix 2
- 20 FEP underpinned Higher Level Stewardship. The condition values are poor (1), moderate (2), good (3) "At the time of the HS2 metric development the FEP approach was the best available evidence regarding condition and its assessment. However, experts considered the FEP to be outdated and somewhat inappropriate" (Natural England, 2016a)
- 21 In the absence of appropriate FEP criteria for certain habitats we allocated a condition score of moderate (2).
- 22 The unit value of field trees was calculated using the methodology from the government's Biodiversity Metric 3.1. On a precautionary basis trees were allocated a root protection area of 0.0366 ha which corresponds to the RPA for urban trees of medium distinctiveness and moderate condition in Biodiversity Metric 3.1. Trees less than 2.5m from the centre line of hedgerows were excluded and trees in parkland and woodland were excluded.
- 23 Table 16 Appendix 5
- 24 These areas lie outside the HS2's NNL area meaning the total areas mapped by CWT and HS2 differ.
- 25 Open Mosaic on Previously Developed land is a Priority Habitat (Habitat of Principal Importance) associated with high biodiversity value brownfield sites.
- 26 Scattered scrub is a term used in Phase One habitat surveys to describe locally native shrubs (and occasional trees) less than 5m tall that do not have a continuous cover.
- 27 HS2 London-West Midlands. No Net Loss in biodiversity calculation- Methodology and Results (2017 baseline) and HS2 No Net Loss in biodiversity calculation – Methodology and Results 2019
- 28 For K2.6 grassed areas distinctiveness 4 there are no published risk multipliers. We applied a 5-year time to target condition risk multiplier to align this habitat creation with other areas of grassland distinctiveness 4
- 29 This is a significant difference to the Biodiversity Metric 3.1 methodology where low distinctiveness habitats can be allocated a moderate or good condition value.
- 30 On Phase 1 much of the baseline assessment was undertaken in 2013
- 31 Calculated as the difference between two values divided by the average of the two values.
- 32 Root Protection Area as calculated by the Biodiversity Metric 3.1 is the number of trees multiplied by 0.0366 ha (urban trees of medium distinctiveness)
- 33 Unit equivalent calculated as medium (4) distinctiveness urban trees of moderate (2) condition multiplied by Root Protection Area of 0.0366 ha (as set out in Biodiversity Metric 3.1).
- 34 ENV_ARP_C250_Phase1Habitats_Pt_ES
- 35 2013 tree dataset.
- 36 ENV_ARP_C250_Phase1Habitats_Pt_ES
- 37 2013 tree dataset.
- 38 ENV_HSTWO_EC_Phase1Habitats_Pt_AP02
- 39 2019 GIS tree dataset. ENV_HSTWO_EC_Phase1Habitats_Pt_AP02
- 40 Details provided in Discussion section of this report
- 41 Removed 345.07u due to amends time to target condition for grassland distinctiveness 4, woodland distinctiveness 6. Revised value is correct for the published time to target condition risk multipliers.
- 42 Removed buildings valued at 45.34u
- 43 Difference in area due to the inclusion of whole waterbodies that are impacted
- 44 Removed buildings valued at 38.57u
- 45 Removed buildings valued at 7.79u

- 46 Removed 345.07u due to amends time to target condition for grassland distinctiveness 4, woodland distinctiveness 6. Revised value is correct for the published time to target condition risk multipliers.
- 47 Removed buildings valued at 45.34u
- 48 Data has not been made available for scrutiny at the time of writing.
- 49 Data has not been made available for scrutiny at the time of writing.
- 50 Data has not been made available for scrutiny at the time of writing.
- 51 Removed buildings valued at 38.57 u
- 52 Removed buildings and built areas valued at 7.79u
- 53 Habitat distinctiveness is a measure of habitat quality. Habitats that are scarce or declining typically score highly relative to habitats that are more common and widespread. HS2 utilise four categories, high, medium, low and very low distinctiveness. All Habitat of Principal Importance (Priority Habitat) is high distinctiveness, semi-natural habitat is generally medium distinctiveness, significantly modified habitats are low distinctiveness and developed areas are very low distinctiveness. Details in Appendix 3, tables 12 and 13.
- 54 HS2 London-West Midlands. No Net Loss in biodiversity calculation- Methodology and Results (2017 baseline) and HS2 No Net Loss in biodiversity calculation – Methodology and Results 2019
- 55 As the Biodiversity Metric 3.1 (2022)
- 56 For example, the creation of species-rich grassland (high distinctiveness, moderate condition) on land that is currently arable.
- 57 NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric.
- 58 Risk multipliers are not used for watercourses in the HS2 NNL metric.
- 59 NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric.
- 60 Natural England undertook similar sensitivity analyses in 2016 to examine HS2's earlier adaptations from the Defra methodology. NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric.
- 61 The 10-year multiplier in the Biodiversity metric 3.1 is 0.70 which results in lower unit values than the 10-year multiplier of 0.71 in the HS2 metric
- 62 All mitigation/compensation habitats post-construction are targeted at achieving moderate condition.
- 63 ENV_HSTWO_NNL_PostConstruction_Ply 2017
- 64 Distinctiveness x condition x difficulty x time x area = Biodiversity Units
- 65 Distinctiveness x condition x difficulty x time x area = Biodiversity Units
- 66 ENV_ARP_2PTO2_NNL_PostConstruction_Ply 2019
- 67 Distinctiveness x condition x difficulty x time x area = Biodiversity Units
- 68 Distinctiveness x condition x difficulty x time x area = Biodiversity Units
- 69 HS2 London-West Midlands. No Net Loss in biodiversity calculation- Methodology and Results (2017 baseline)
- 70 HS2 No Net Loss in biodiversity calculation – Methodology and Results 2019
- 71 HS2 London-West Midlands. No Net Loss in biodiversity calculation- Methodology and Results (2017 baseline)
- 72 HS2 No Net Loss in biodiversity calculation – Methodology and Results 2019
- 73 Defra Biodiversity Metric versions 2.0, 3.0, 3.1
- 74 HS2 hedgerow habitat creation K2.5 is valued as native species rich.
- 75 The 10-year multiplier in the Defra metric is 0.70 which results in lower unit values than the 10-year multiplier in the HS2 metric.
- 76 Metres in HS2 No Net Loss metric, kilometres in Defra metric.
- 77 (x time to target condition x difficulty).
- 78 Distinctiveness value for all hedgerows is set at 1.
- 79 Condition value multiplied by length.
- 80 In areas only used for construction HS2 Ltd. have committed to replacing habitat on a like for like basis which would include species-rich hedgerows with trees. HS2 Ltd. only use the 10-year time to target condition multiplier for hedgerow creation whereas the Defra metric utilises a 20-year time to target condition for these particular hedgerows.
- 81 Including intact native species-rich hedgerows (J.2.1.1, P1 survey code) and hedges with trees native species-rich (J.2.3.1, P1 survey code).
- 82 i.e. Predominantly 2u/metre compared to 2.13 u/metre for new hedgerows post-construction (when risk factors applied).
- 83 Also significantly undervalued compared to earlier versions of the Defra metric including version 2.0 published in 2019.
- 84 NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric.
- 85 Farm Environment Plan, Higher Level Stewardship. 2010.
- 86 This approach should:
 - attribute a very high distinctiveness (8) and condition value of good (3) to all native species-rich hedgerows with trees associated with a ditch or bank (where these can be identified).
 - attribute a high distinctiveness (6) and condition value of moderate (2) to all hedgerows with trees or a ditch/bank.
 - attribute a medium distinctiveness (4) and condition value of good (3) to intact hedgerows.
 - attribute a medium distinctiveness (4) and condition value of moderate (2) to defunct hedgerows.
 - attribute a very low distinctiveness (1) and condition value of poor (1) for non-native ornamental hedgerows (where these can be identified).
- 87 Such as Local Wildlife Site data where condition attributed is 3.
- 88 Also significantly overvalued compared to earlier versions of the government's biodiversity metric including version 2.0 published in 2019
- 89 Risk factors are used to account for time to target condition and difficulty for other habitats.
- 90 Environmental Sustainability Report April 2020 – March 2021
- 91 Independent quality assurance is recommended by

- Natural England in 'NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric'.
- 92 NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric.
- 93 Any adaptation to the government's biodiversity metric should be independently quality assured as recommended by Natural England in 'NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric'.
- 94 HS2 core values 2022: 'Acting fairly, transparently and consistently. That means using the powers we've been given wisely; acknowledging the impact of the HS2 programme; and doing the right thing, even in difficult circumstances.
- 95 FEP – Farm Environment Plan methodology 2010
- 96 Priority habitat ponds (distinctiveness 6) were identified by the presence of Great Crested Newts. In some cases, HS2 assigned ponds as non- priority where there was insufficient or incomplete survey data. For example, where either a) less than 4 survey visits had been undertaken; b) one or more survey visits were undertaken outside the mid-May – mid-June survey window; c) eDNA samples were lost by the courier; d) ponds were not accessed for survey. CWT found some ponds were given a non-priority score despite there being a medium meta-population of Great Crested Newts identified from HS2 data. These ponds were reassigned a distinctiveness 6 value.
- 97 The following criteria were developed by HS2 Ltd.:
- Distinctiveness: Priority ponds (distinctiveness 6) were identified due to the presence of Great Crested Newts, Water vole or White Clawed Crayfish. Non-priority ponds were attributed a medium distinctiveness value.
 - Condition: if a pond was not surveyed it was assigned a condition weighting of moderate 2. Where ponds were surveyed, these were assigned a condition weighting of 2 if these met one of the following criteria. If these met two or more criteria, they were assigned a condition weighting of x 1
 - a) more than 500m from any other water body
 - b) not within semi-natural habitat (i.e., if these are within hard standing, arable, pasture)
 - c) contain non-native (signal) crayfish
 - CWT applied the same pond scores as HS2 where data was available and applied the same principles where data was limited.
- 98 All habitats identified as being of low habitat distinctiveness (including those not surveyed) were automatically allocated a condition weighting of 1 by HS2. For medium and high distinctiveness habitats, where access was not available for survey a condition weighting of 2 was assumed by HS2. Where there was a very clear justification based on the information available a condition weighting of 1 was allocated by HS2. A condition score of 3 was allocated by HS2 for all habitat areas of high or moderate distinctiveness that occur within designated wildlife sites i.e. LWS and SSSI, based on the precautionary assumption that these are managed for the benefit of nature conservation. *CWT applied the same principles.*
- 99 HS2 separated out scattered scrub and dense scrub, whereas CWT measured the individual patches of scrub and identified the remaining area the underlying habitat.
- 100 The following criteria were developed by HS2 Ltd.:
- Distinctiveness: Priority ponds (distinctiveness 6) were identified due to the presence of Great Crested Newts, Water vole or White Clawed Crayfish. Non-priority ponds were attributed a medium distinctiveness value.
 - Condition: if a pond was not surveyed it was assigned a condition weighting of moderate 2. Where ponds were surveyed, they were assigned a condition weighting of 2 if they met one of the following criteria. If they met two or more criteria, they were assigned a condition weighting of x 1
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 - b) not within semi-natural habitat (i.e. if these are within hard standing, arable, pasture)
 - c) contain non-native (signal) crayfish
 - **CWT applied the same pond scores as HS2 where data was available and applied the same principles where data was limited.**
- 101 Removed 345.07u due to amends time to target condition for grassland distinctiveness 4, woodland distinctiveness 6. Revised value is correct for the published time to target condition risk multipliers.
- 102 Removed buildings valued at 45.34u
- 103 Difference in area due to the inclusion of whole waterbodies that are impacted
- 104 Removed buildings valued at 38.57u
- 105 Removed buildings valued at 7.79u
- 106 Not accounting for area of field trees
- 107 Ancient Woodland and other woodland habitats that have been excluded from the metric that are part of Ancient Woodland mitigation
- 108 Grassland habitats excluded from the metric that are part of Ancient Woodland mitigation
- 109 -45.34 u for built areas
- 110 Other habitats that are part of Ancient Woodland mitigation excluded from the metric plus areas of Running water. Running water habitats are accounted for separately as linear based biodiversity units and areas of Running water have been excluded from the area-based biodiversity units
- 111 Difference to HS2's figures predominantly due to the inclusion of the entire area of impacted waterbodies in baseline assessment.
- 112 Not accounting for area of field trees
- 113 Ancient Woodland and other woodland habitats that have been excluded from the metric that are part of Ancient Woodland mitigation
- 114 Removed buildings -7.79 u
- 115 Grassland habitats excluded from the metric that are part of Ancient Woodland mitigation
- 116 Other habitats that are part of Ancient Woodland mitigation excluded from the metric plus areas of Running water. Running water habitats are accounted for separately as linear based biodiversity units and areas of Running water have been excluded from the area-based biodiversity units

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Report on HS2 Ltd's Bowood Lane Mitigation site

HS2 Responses shown in Green

Please note

A non-response in relation to any particular statement or allegation in this document does not mean that we agree with such statement/allegation. We have confined our responses to the specific questions raised in this document.

1.1

This report is written by Mark Keir, of Jones' Hill Wood.

I have no formal qualifications in ecology, but I do have RHS Advanced Certificate and 25 years or more experience as a gardener/horticulturalist.

Having been central to much of HS2 Ltd's recent angst in Court, I have also spent many, many hours studying HS2's Environmental Statement, Ecology Site Management Plan, Natural England Licences and other documentation relating to HS2 works around Jones' Hill Wood and the Bowood Lane mitigation site.

2.0 Overview

2.1

HS2's proposed route cuts through the SW corner of Jones' Hill Wood, an ancient woodland in the heart of the Chilterns AONB. The Act of Parliament specified extensive mitigation adjacent to the Wood to in some degree, ameliorate the destructiveness of the construction and to adhere to the often repeated aspiration to no net loss to biodiversity.

Further to the originally planned mitigation, Fusion JV (main HS2 contractor at this point) had been forced in October 2020 through Court action to survey Jones' Hill Wood for a first time, apply for appropriate licence from Natural England (WML OR 58) and draw up considerable extra mitigation works to comply with that licence.

The issue of the Licence was called to question through the Courts and was the cause of some considerable concern to HS2 Ltd and Fusion JV, highlighting as it did HS2's much vaunted environmental ethics and their ability/inability to demonstrate their adherence to same. It might be assumed therefore that holding rigidly to the licence conditions would be a priority, and that the very best mitigation work would be put in place.

This report looks at that mitigation, it's present standard and likely success going forward, and how it measures up to compliance with that licence.

The map in Fig 1 shows the parcels of land involved.

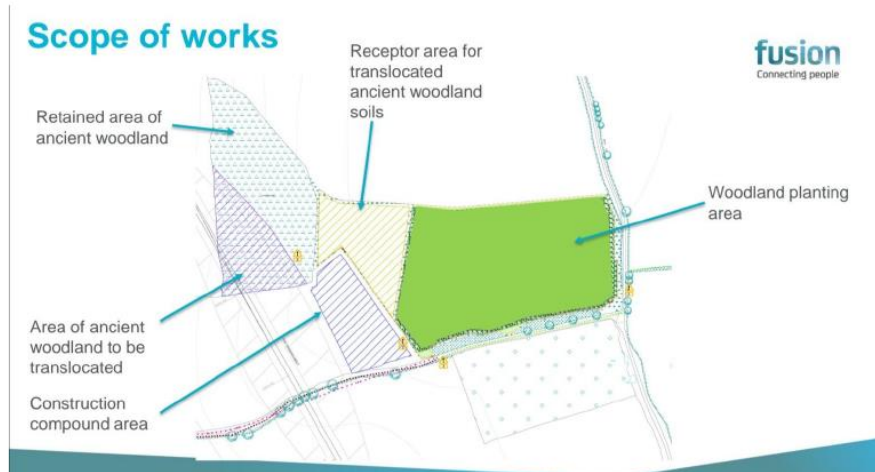


Fig 1

2.2

The areas of importance to this report are: "Receptor area for translocated ancient woodland soils", "Woodland planting area" and Jones' Hill Wood ("Area of ancient woodland to be translocated" and "Retained area of ancient woodland") itself.

What I have observed does not put HS2 Ltd in a good light. My observations have been made from the perimeter fence, with no access to the sites given to "protesters" or anyone else for that matter, but even from that sometimes distant vantage, there seems little to celebrate.

3.0 Receptor Site

3.1

The receptor site host soil was compacted (Fig 2) pretty much daily with heavy machinery over the whole of winter '20/21 and was waterlogged much of that time. This was never ameliorated.



Fig 2

Trial holes of the subsoil at the receptor site were undertaken under the supervision of a qualified soil scientist. This identified some damage to the topsoil in the receptor site location. The surveys identified no damage to the subsoils at the receptor site. All receptor site topsoil was progressively removed prior to the ancient woodland soil transfer taking place with regular inspection of soils undertaken.

3.2

Translocated soil was placed well out of acceptable season in April/May '21. The translocated ancient hedge (possibly 1500yrs old) was moved in April in dry desiccating winds. The translocated trees including those for live specimens were moved as late as late May, even into June 2021. Other whips and pot grown stock were planted May/June '21. None of these movements come even close to standards laid out in the Environmental Statement.

As works were undertaken outside the “translocation window” this was deemed a soil salvage. Aside from the seasonal window all other works were undertaken following translocation best practice. In addition to this HS2 will install additional compensation planting.

Containerised planting (pot grown stock hedgerow) can be planted all year around and were watered to aid growth following planting. This is in line with Nursery stock - British Standard BS3936-1/4

Losses of stock planting is assessed and managed in the maintenance period.

3.3

Of the translocated ancient hedge, it appears one plant is surviving, six barely surviving and unlikely to succeed. The other seventeen are quite dead including yews and hollies (Fig 3).

Existing Hedgerow was moved from the woodland edge to provide height and connectivity from the retained hedgerow and to retain soils within the root structure of existing hedgerow.



Fig 3

3.4

Few if any of the translocated trees taken for live specimens in the site have survived (Fig 4). In the receptor site there is a large empty space possibly equivalent to over a third the total area suggesting the area of mitigation falls well short of area of woodland destroyed (Fig 5) In addition to this the long new front to the ancient woodland, composed of newly exposed etiolated weak trees suggests that there will be much secondary damage unaccounted for in ecologists assessments.

All monolith and existing trees are relocated to provide vertical diversity within the site. Existing trees are translocated with the intention of survival. Should trees not survive they along with monoliths provide important standing deadwood features with ecological value.

9% (600m²) of the woodland soils were not translocated as the woodland soils were found to be substandard following previous protector habitation, the required security operation or due to increased nutrient and intensity of weeds within the donor site. For clarity the woodland salvaged soils were placed at the same thickness and layer composition as per the donor site.

The retained woodland facing the removed woodland forms the Woodland Edge Management Zone and falls within Act limits. This zone will continue to be monitored and managed. An arboricultural survey was carried out and trees within this zone assessed to be wind firm and will continued to be monitored. Fallen trees outside of Act limits are the responsibility of the Landowner.



Fig 4



Fig 5



Fig 6

3.5

The supposed bat flightline trees within the receptor site are, as far as bats are likely concerned, lost amid a jumble of erratically placed considerably larger trees and monoliths (Fig 7).



Fig 7

The bat flight line was installed as per Licence conditions and provides a continuous line. Monoliths and larger relocated trees provide further ecological benefits in a random layout reflecting their position in the former woodland.

3.6

Bat boxes placed within the receptor site are unlikely to see any shelter from weather or light for at least 30 years. Presumably the fragmentation of habitat so ruthlessly executed will likely not be repaired any time before that.

A 2m wide strip of heavy weed infestation along the hedge line appears to have had an application of herbicide in August '21

There are many smaller whips and pot grown plants added to the hedge and throughout the translocated site. These tend to be deep in weeds so only a rough estimate of around 25 - 30% attrition can be given (Fig 8)

Bat boxes were installed as part of the Licence and are supplementary to boxes placed within the Woodland Edge Management Zone and a mature tree group along Bowood Lane that falls within Act Limits.

Herbicides have been used to control weeds to avoid impact to new planting within the planting site. The planting site is managed in line with the ecological site maintenance plan and performing in line with expectations

Trees transplanted into the ancient woodland soils are expected to supplement natural regeneration and weed growth is part of the regeneration phase and not artificially managed with herbicide.



Fig 8

3.7

The immediate impression of the site is of something reminiscent to a WW1 battlefield. The Jones' Hill community long ago referred to this area as "The Graveyard".

4.0 Bat Flight Lines

4.1

There are two main lines of nursery grown semi-mature trees planted as flight corridors for bats, planted across the receptor site and the woodland planting site. Within the receptor site, as mentioned above, it is unlikely that these trees form any legible guide to bats (Fig 7). The majority of these trees appear heading toward untimely death. (Fig 9, Fig 10)

The Bat Licence holder has continued to attend the site during construction and following completion. They are satisfied works are within the licence conditions.

Responded in Paragraph 3.5 and 4.2 (Below)



Fig 9



Fig 10

4.2

Along the contiguous northern perimeter of the receptor site and woodland planting site there are 37 of these trees, all with watering bags, but 24 are stressed to very stressed with a 10 probably dead. Many of these despite being given quite substantial supports (some months after planting) are leaning at precarious angles (Fig 11) and, furthermore, the ties to those supports are poorly executed (Fig 12) with only a small handful of trees actually benefitting from that support. Most will soon be seriously damaged by chafing at a critical height as wind rocks the trees on the hard supports. The water bags have only been seen being filled twice since planting in April.



Fig 11



Fig 12

Any failure of planted trees will be replaced in the Optimum Winter 2021/2022 planting season. Ongoing upkeep of the Bat flight line is stated as a Licence condition.

Substandard tree ties were identified and will be rectified this planting season (2021/2022).

A watering regime was established for the trees during the works. Upon demobilisation from the site watering ended.

4.3

The second line of trees runs diagonally from Jones' Hill Wood to the unnamed wood at top of Bowood La. From a standpoint behind the northern fence, only 14 are assessable. 8 of those are clearly stressed, some possibly dead. 7 are close enough for the base of the tree to be discernable, and there are no water bags to be seen (Fig 13). Supports and tying follows the same pattern as above.

Please refer to answer for 4.2.



Fig 13

4.4

I believe these trees were originally considered supplemental, it seems odd they have taken on role of compulsory compliance requirement.

I have never seen any watering beyond the two bag fillings noted above. No bowser has been seen on the site or adjacent compound.

Bat flight lines were required as part of the Bat Licensing condition. Regarding watering please refer to 4.2 above.

5.0 Woodland planting site

5.1

This area was mostly decompacted February/March '21. There was no other preparation.

Planting of whips took place March through April '21.

Overall the whips seemed well placed and in May '21 or later, sometime after planting, were provided with canes and paper rabbit guards (first time I've seen HS2 use these rather than plastic, good to see!).

According to HS2's documentation there was a proposed 22000 plants across this site, but pacing out, and looking at planting density I see scope for little more than 8 or 9000 plants

here.

Following feedback from the local authority the original planned 22,000 trees communicated during the stakeholder engagement period were reduced to 13,445 trees as it was felt the tree density at the woodland edge was too high. Subsequently 10,722 trees were planted on this site in the 2020-21 planting season, and 2,723 trees are planned to be planted in the 2021-22 planting season as well as any replanting requirement for failed trees.

5.2

Given ponds have been added to the original plans for unexpected licence compliance requirements, and that there are large unplanted areas in the centre of the area, I suspect plant numbers are markedly below original quotes, to an extent that needs to be questioned. Is this a policy followed elsewhere? How is this to be reflected in the proclaimed 7 million trees to be planted?

Plans I have seen show hedging along a serpentine edge to the fence line, but what has appeared is a straight line (Fig 14).



Fig 14

The requirement for the 3 no. waterbodies were identified through the approval of the bat licence, in discussion with Natural England. This required adaption of the planting design. Previously planted whips were removed for access and replanted within the site. Where possible waterbodies were located within maintenance areas of the planting area to reduce removal of whips.

Hedgerow planting is in accordance with the construction issued drawing and superseded by Bat Licence conditions.

HS2 commitment is to create an unprecedented 'green corridor' of new wildlife habitats and woodlands which will include planting up to 7 million new trees and shrubs between London and the West Midlands which will support delicately balanced local ecosystems running through the spine of the country.

5.3

The majority of whips seem to be progressing, though an attrition of about 25-30% looks likely.

Most of the area is under a major infestation of weeds with the majority of whips quite invisible (Fig 15).



Fig 15

HS2 have committed to replace the majority of failed trees over a five-year period during the establishment of the woodland. A natural thinning out is planned as the woodland matures so a low level of attrition is accepted. Current assessments reflect a 25% failure rate, this is as expected for an exposed hillside site.

Understory woodland Management is being carried out as per Maintenance schedule. Weeds competing with planting are treated with herbicide. Weed treatment was undertaken in the Autumn and will continue to be managed. Assessment of wildflower mix indicates performance meeting expectation.

5.4

That same weed infestation and associated seed fall will have major implications for any seeding of open "glade" at centre of this area.

There appears to have been an application of herbicide along the north and east hedge boundaries (Fig 13), possibly to reduce wind blown seed contaminating adjacent agricultural land. If this is the case it looks to be a futile underperformance. There is a very considerable seed bank here which the local farmer must wince painfully when he sees.

The grassland glades alongside controlled herbicide use and maintenance has established well and there is a diverse range of wildflowers which will colonise and in time thwart any weak annual weed growth. The threat to further grassland establishment by weed seed will be treated following the maintenance plan. The grassland rides will be cut in March and April 2022 to get rid of any prolific annual agricultural weed seed germination and arisings removed from site.

6.0 Jones' Hill Wood

6.1

Over a third of the Wood was actually felled. The expressed need for speed in Court was to facilitate constructing the urgently required haul road. As of September '21, there is little sign of any road building. Does this mean better mitigation could have been in place before felling? Does this mean more appropriate seasons for translocating and planting might have been found? Does this mean asking to waive the regulators rules for the sake of costs incurred was misleading?

Even now, the Woodland Management Zone is full of various detritus of the massive security presence posted there since October '20.

Construction of the internal haul route has progressed north from the access point off the A413 at Great Missenden compound, up to and past the Jones Hill Wood area.

If the Fusion clearance works at Jones Hill Wood were not completed until Autumn 2021, EKFB's access past Jones Hill Wood would have been severely impeded and this would have delayed internal haul route construction and Earthwork activities until Spring 2022.

6.2

Still this beleaguered strip that is now a wide open front to the Wood is floodlit every night (Fig 16), though lamp numbers have been reduced. The noisy generators now only run at night, coming on after sun down.

Due to presence of personnel onsite during hours of darkness, lighting is required to ensure their safety and wellbeing.



Fig16

6.3

The flood lights still lie under some of the bat boxes sited here in April. As mentioned above, the Wood now has a very wide open front allowing light and weather penetrate right through the heart of the Wood and already some weaker specimens on the supposedly safe side have sadly succumbed (Fig 17).

Answered in 6.2

Answered in 3.4



Fig 17

6.4

It is worth noting too, that the three prime potential roost site standing deadwoods are now frontline to the weather (By experience I can attest to the windiness of this Woodland!) and have been seen rocking significantly in fairly gentle winds.

<https://photos.app.goo.gl/4knGxzkp8jLTGoZT7>

Additional Bat roosts, both new boxes and potential roost features have been placed within the Woodland Edge Management Zone in favourable locations as per the bat licence. Suitable roost features were identified prior to felling for reuse in this zone and have been attached to existing trees.

6.5

Numbers of glis glis in the Wood seem much reduced, possibly many of them burrowed in the soil extraction area over winter. There may be a corresponding increase in grey squirrel numbers.

Tawny owls have recently started moving back in.

The bat population seems considerably less than prior to HS2 Ltd's engagement with this iconic Chiltern wood.

Over all, Jones' Hill Wood now looks set for further serious deterioration.

7.0 Summary

7.1

The work done on behalf of HS2 Ltd in and around Jones' Hill Wood has appeared shambolic, hurried, mis-timed and mismanaged. What has resulted is far from adequate. Although some of the work has been executed with seeming care, it is unlikely that given lacklustre and/or dismal work surrounding, that this was any more than box ticking. If this is the standard that Fusion/HS2 Ltd attain in full public glare and whilst a very public legal case on this very topic was ongoing or just recently finished, it does not bode well for HS2's work elsewhere. HS2 Ltd seem a very long way off claims of no net loss to biodiversity and of a green corridor of rich nature-scapes. The failure on so many counts suggests little faith can be put in HS2 Ltd or their contractors to adhere to the Environmental Statement.





CORE-C-179

Mary Barraclough

From: Caroline Thomson-Smith [REDACTED]
Sent: 05 April 2023 21:41
To: HS2Injunction
Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Review Application [DLAP-UKMATTERS.FID6569426]

****EXTERNAL****

Dear Sir/Madam,

I refer to my email of 02/04/2023 in which I requested to be removed by the claimants as a named defendant and to be informed of their decision by yesterday, 04/04/2023.

As I have not heard from you I am assuming that the claimants have decided that I should remain as a named defendant on the order.

According to the directions I received as recently as 10 days ago, only 5 days remain to make my submission to you and the court. Although I have been able to receive limited legal advice I am unrepresented in these matters. As a layperson who is self employed with family commitments to my children, the child to whom I am legal special guardian and to my 91 year old disabled mother, and with the Easter weekend upon us, I am sure you will appreciate the time constraints I am under to read the numerous lengthy and complex documents you have served on me over the past month.

There are several matters which I will briefly outline here which the claimants should be made aware of such that they can make the corrections that are necessary to ensure that their witness statements report the facts accurately and fairly and to decide upon their action with regard to my request to be removed as a named defendant.

1. I did not breach the injunction by knowingly trespassing on HS2 land causing delay, disruption or loss to HS2 as alleged on 06/10/2022. I was present in Aylesbury that day in the manner described on the HS2 website: "A rambler who inadvertently strays from a footpath would not be in breach of the injunction unless they then tried to delay hinder or damage HS2."
2. I did not take part in slow walking direct action Aylesbury on the A418 on 09/09/2021.
3. On 05/02/2023 I did not repeatedly unlawfully place myself in dangerous positions that prevented EKFB devegetation teams from removing trees. I did not do anything illegal or unlawful. I did not behave disproportionately to the extreme psychological and verbal provocation, verbal abuse and physical assault I sustained from the IRT and some employees of EKFB nor was I extremely verbally abusive. I would call into question the opinion of Mr Hobson and his dubious assessment of my words as abusive. Anything I did or said that day was proportionate and in self defence. I did not do anything that was in breach of the injunction.
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I will contact you again in 10-14 days time with photographs, videos and my own witness testimonies which will illustrate the above points and add clarity to the documents sent out to me: material which I am sure the claimants will find most useful in deciding whether it is appropriate for me to remain as a named defendant but also to educate them with regard to the full facts and context of the incidents described so inadequately (and in some places inaccurately) by their witness Mr Hobson. Thus armed, your claimants may then be able to more reliably determine what corrective action should be taken with their contractors operations going forward and what more immediate corrective action regarding the order might be desirable.

Yours faithfully,

Caroline Thomson-Smith

On Sun, 2 Apr 2023 at 22:11, Caroline Thomson-Smith [REDACTED] wrote:

To whom it may concern,

I note that as of 27th March 2023, HS2 Ltd seek to add me as a named defendant to the application for an extension of the routewide injunction granted in 2022.

Having sought legal advice, I request that I am removed as a named defendant from the amended particulars of the application.

This is on the basis that the statements made by James Hobson and Groves upon which your justification for adding me as a named defendant is based are inaccurate, misleading, full of hyperbole and misrepresent the facts. There is no evidence to suggest that I breached the injunction on the 6th October or engaged in any unlawfulness on the 5th February or during the XR protest in London.

You should note that serving notice of your application to me on 27th March leaves only 2 weeks and 1 day to provide a statement and all supporting evidence to the court by 11th April which I feel is very short notice and unfair. I therefore ask that you reply to my request to be removed as a named defendant by Tuesday, 4th April at the latest in order for me to prepare my statement for the court.

Yours sincerely,
Caroline Thomson-Smith

On Mon, 27 Mar 2023, 15:06 HS2Injunction, <HS2Injunction@dlapiper.com> wrote:

Dear Ms Thomson-Smith

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 16 March 2023 below.

Please note that, in accordance with Paragraph 11 of the Directions Order, the Claimants have made an application to the Court ahead of the Review Hearing and have now filed a draft order and their evidence.

We attach by way of service upon you:

- (1) Application Notice;
- (2) Draft Order;

- (3) Amended Particulars of Claim;
- (4) First Witness Statement of James Dobson;
- (5) Eleventh Witness Statement of Julie Dilcock; and
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Please note that the Witness Statements of James Dobson and Julie Dilcock listed above at (4) and (5) refer to non-video Exhibits, copies of which can be found at <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>. The Witness Statement of James Dobson listed at (4) above also refers to video evidence which can be viewed at <https://vimeo.com/showcase/exhibit-JD6>.

All of the documents listed above have also been placed on <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

You will note from the Application documents that the Claimants are asking the Court, at the Review Hearing, to vary and extend the Injunction Order and to add you to the Injunction Order as a Named Defendant.

In accordance with paragraph 12 of the Directions Order any person seeking to amend (including discharge) the Injunction Order, or oppose any applications made by the Claimants, must file and serve a statement of case and any evidence upon which they seek to rely by emailing or posting it to the Court and the Claimants at the addresses listed in the Directions Order, by 4 pm on 11 April 2023.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 16 March 2023 21:38

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 13 March 2023 below and now attach by way of service a copy of the Directions Order that has been made by the court.

The Directions Order sets out at paragraphs 9 – 17 the requirements for the conduct of these court proceedings up to the Review Hearing on 16 May 2023.

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We refer to the order made in these court proceedings by Mr. Justice Julian Knowles on 20 September 2022 (the "Injunction Order").

The Injunction Order took immediate effect and presently runs until 23:59 on 31 May 2023, subject to a requirement that it be reviewed on a yearly basis.

The court has listed a hearing at which the Injunction Order will be reviewed. This will take place on Tuesday 16 May 2023 at 10:30am at the Birmingham Civil and Family Justice Hearing Centre with a time estimate of 1 day (the **“Review Hearing”**). The Claimants have placed details of the Review Hearing on the HS2 Proceedings Website as required by the Injunction Order – [here](#).

Ahead of the Review Hearing, the Claimants have applied to the court for directions for the conduct of these court proceedings up to the Review Hearing (the **“Directions Application”**).

A copy of the Directions Application is attached to this email by way of service on you. It includes:

- 1.Application Notice;
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Yours faithfully

DLA Piper UK LLP

Mary Barraclough

From: HS2Injunction
Sent: 06 April 2023 11:00
To: Caroline Thomson-Smith
Cc: HS2Injunction
Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Review Application [DLAP-UKMATTERS.FID6569426]
Attachments: DRAFT undertaking - Caroline Thomson-Smith 06.04.2023.pdf

Dear Ms Thomson-Smith

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to your emails of 2 and 5 April 2023 below.

In terms of the length of time afforded to you for filing and serving any evidence upon which you seek to rely in opposition to the applications made by the Claimants (the deadline for which being 4 pm on 11 April 2023), that deadline has been decided by the Court (not by the Claimants) as per paragraph 12 of the Directions Order which was served on you by email timed at 21:38 on 16 March 2023 (as evidenced in the email chain below).

Turning to your request that you be removed as a Named Defendant, it is the Claimants' position that they are required by existing case law to name you as a Defendant to these proceedings on the basis of the evidence set out in the First Witness Statement of James Dobson ("**Dobson 1**"). As detailed at paragraphs 14 and 29 of Dobson 1, it is the Claimants' position that you have breached the Injunction by trespassing upon HS2 Land and have also engaged in unlawful action designed to disrupt and stop works on the HS2 Scheme and cause loss and damage to the Claimants and which is not currently prohibited by the Injunction (further details of these incidents are included at paragraphs 31-45, 88-92, and 111-142 of Dobson 1).

If it is the case that you do not intend to trespass on the HS2 Land again or to engage in any unlawful action designed to disrupt and stop works on the HS2 Scheme and cause loss and damage to the Claimants and which is not currently prohibited by the Injunction, then the Claimants would be prepared to reach an agreement with you that would mean you would not be added as a Named Defendant to these proceedings and confirm that they would not seek a costs order against you.

Please find attached the form of undertaking to the Court that the Claimants would be prepared to agree in order to not add you as a Named Defendant to these proceedings with no order as to costs.

We recommend that you take independent legal advice from a solicitor or citizens advice bureau if you are unsure about the terms of the undertaking and the implications of signing it, or any of the documentation you have received.

We look forward to receiving the undertaking from you – signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by us on behalf of the Claimants.

Yours faithfully

DLA Piper UK LLP



From: Caroline Thomson-Smith [REDACTED]
Sent: 05 April 2023 21:41
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Sent: 16 March 2023 21:38

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

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Yours faithfully

DLA Piper UK LLP

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Between:

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

Claimants

-and-

(D66) CAROLINE THOMSON-SMITH

Defendant

FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

If you the within named Defendant disobey the undertakings set out in this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE DEFENDANT

This order prohibits you from doing the acts set out in paragraph 4 below. You should read it very carefully.

FURTHER TO the Orders made in these proceedings by Julian Knowles J on 20 September 2022 (the "Injunction Order") and by HHJ Kelly on 16 March 2023 (the "Directions Order")

AND UPON the Claimants' application by Application Notice dated 27 March 2023 pursuant to the provisions at paragraphs 15 and 20 of the Injunction Order ("March 2023 Application").

AND UPON Caroline Thomson-Smith accepting that she has previously trespassed on the HS2 Land;
and

AND UPON Caroline Thomson-Smith giving undertakings to the Court as set out below.

AND UPON Caroline Thomson-Smith confirming that she understands and acknowledges that she may nevertheless become Defendant 2, 3, 4 or 68 as a person unknown if she commits any of the acts prohibited in any order of the Court made in these proceedings against those Defendants.

IT IS ORDERED THAT:

1. The Claimants' March 2023 Application as against Caroline Thomson-Smith (D66) only is dismissed.
2. There be no order as to costs between the parties.
3. Service of this Order may be effected, as an alternative, by electronic means by email to Caroline Thomson-Smith at cthomsonsmith@gmail.com and such service shall be deemed to be good and sufficient service on the Defendant.

UNDERTAKINGS TO THE COURT

In this Order the “**HS2 Land**” means all of the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme. The extent of the HS2 Land as at the date of these undertakings is shown coloured pink and green on the March 2023 HS2 Land Plans which are available electronically on the RWI Updated Website at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>, and

the “**HS2 Acts**” means the High Speed Rail (London – West Midlands) Act 2017 and the High Speed Rail (West Midlands – Crewe) Act 2021.

4. Caroline Thomson-Smith undertakes to the Court promising as follows: -
 - a. Not to enter or remain upon the HS2 Land;
 - b. Not to deliberately obstruct or otherwise interfere with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land;
 - c. Not to interfere with any fence or gate on or at the perimeter of the HS2 Land; or
 - d. Not to, by unlawful means, obstruct, impede, hinder, or delay works or activities authorised by the HS2 Acts, in express or implied agreement or combination with another person with the intention of causing damage to the Claimants.

AND TO BE BOUND BY THESE PROMISES UNTIL 31 MAY 2024

5. Caroline Thomson-Smith's promises at paragraph 4 do not prevent Caroline Thomson-Smith from:

- a. Exercising her rights of way over any open public right of way over the HS2 Land; or
- b. Exercising her lawful rights over any public highway.

STATEMENT

I understand the undertakings that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized, or I may be sent to prison for contempt of court.

CAROLINE THOMSON-SMITH

Date:

We consent to an order in these terms

DLA PIPER UK LLP

Solicitors for the Claimants

Date:

Mary Barraclough

From: HS2Injunction
Sent: 13 April 2023 12:17
To: Caroline Thomson-Smith
Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Review Application [DLAP-UKMATTERS.FID6569426]

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ms Thomson-Smith

Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 6 April 2023.

The Directions Order made by the court on 15 March 2023 is very clear that if you wish to amend the Injunction Order or oppose our clients' application, you must file with the court and serve a statement of case and any evidence upon which you seek to rely by 4pm on 11 April 2023.

That deadline has now passed. We have not received a statement of case or any evidence from you. We therefore presume that you did not file anything with the court by the deadline.

Please note that if you intend to submit evidence after the deadline in the Directions Order a formal application will need to be made to the court for this evidence to be admitted. Our clients expect that application to be made in sufficient time ahead of the hearing listed for 16 May 2023 in order that they have time to: (i) consider that application; (ii) file evidence in response (if necessary); and (iii) have a viable amount of time to prepare for the hearing.

The Claimants offer that you give written undertakings to the court instead of being added as a Named Defendant to these proceedings, set out in our email of 6 April 2023, remains open for acceptance by you.

Yours sincerely

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 06 April 2023 11:00
To: Caroline Thomson-Smith [REDACTED]
Cc: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Review Application [DLAP-UKMATTERS.FID6569426]

Dear Ms Thomson-Smith

Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to your emails of 2 and 5 April 2023 below.

In terms of the length of time afforded to you for filing and serving any evidence upon which you seek to rely in opposition to the applications made by the Claimants (the deadline for which being 4 pm on 11 April 2023), that deadline has been decided by the Court (not by the Claimants) as per paragraph 12 of the Directions Order which was served on you by email timed at 21:38 on 16 March 2023 (as evidenced in the email chain below).

Turning to your request that you be removed as a Named Defendant, it is the Claimants' position that they are required by existing case law to name you as a Defendant to these proceedings on the basis of the evidence set out

in the First Witness Statement of James Dobson (“**Dobson 1**”). As detailed at paragraphs 14 and 29 of Dobson 1, it is the Claimants’ position that you have breached the Injunction by trespassing upon HS2 Land and have also engaged in unlawful action designed to disrupt and stop works on the HS2 Scheme and cause loss and damage to the Claimants and which is not currently prohibited by the Injunction (further details of these incidents are included at paragraphs 31-45, 88-92, and 111-142 of Dobson 1).

If it is the case that you do not intend to trespass on the HS2 Land again or to engage in any unlawful action designed to disrupt and stop works on the HS2 Scheme and cause loss and damage to the Claimants and which is not currently prohibited by the Injunction, then the Claimants would be prepared to reach an agreement with you that would mean you would not be added as a Named Defendant to these proceedings and confirm that they would not seek a costs order against you.

Please find attached the form of undertaking to the Court that the Claimants would be prepared to agree in order to not add you as a Named Defendant to these proceedings with no order as to costs.

We recommend that you take independent legal advice from a solicitor or citizens advice bureau if you are unsure about the terms of the undertaking and the implications of signing it, or any of the documentation you have received.

We look forward to receiving the undertaking from you – signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by us on behalf of the Claimants.

Yours faithfully

DLA Piper UK LLP



From: Caroline Thomson-Smith [REDACTED]
Sent: 05 April 2023 21:41
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Review Application [DLAP-UKMATTERS.FID6569426]

****EXTERNAL****

Dear Sir/Madam,

I refer to my email of 02/04/2023 in which I requested to be removed by the claimants as a named defendant and to be informed of their decision by yesterday, 04/04/2023.

As I have not heard from you I am assuming that the claimants have decided that I should remain as a named defendant on the order.

According to the directions I received as recently as 10 days ago, only 5 days remain to make my submission to you and the court. Although I have been able to receive limited legal advice I am unrepresented in these matters. As a layperson who is self employed with family commitments to my children, the child to whom I am legal special

guardian and to my 91 year old disabled mother, and with the Easter weekend upon us, I am sure you will appreciate the time constraints I am under to read the numerous lengthy and complex documents you have served on me over the past month.

There are several matters which I will briefly outline here which the claimants should be made aware of such that they can make the corrections that are necessary to ensure that their witness statements report the facts accurately and fairly and to decide upon their action with regard to my request to be removed as a named defendant.

1. I did not breach the injunction by knowingly trespassing on HS2 land causing delay, disruption or loss to HS2 as alleged on 06/10/2022. I was present in Aylesbury that day in the manner described on the HS2 website: "A rambler who inadvertently strays from a footpath would not be in breach of the injunction unless they then tried to delay hinder or damage HS2."
2. I did not take part in slow walking direct action Aylesbury on the A418 on 09/09/2021.
3. On 05/02/2023 I did not repeatedly unlawfully place myself in dangerous positions that prevented EKFB revegetation teams from removing trees. I did not do anything illegal or unlawful. I did not behave disproportionately to the extreme psychological and verbal provocation, verbal abuse and physical assault I sustained from the IRT and some employees of EKFB nor was I extremely verbally abusive. I would call into question the opinion of Mr Hobson and his dubious assessment of my words as abusive. Anything I did or said that day was proportionate and in self defence. I did not do anything that was in breach of the injunction.
4. On 22/11/2022 I did not "execute a series of direct actions under the banner of Cut the Ties". I was asked to attend a protest in London to livestream it. I found out about the protest only a few days prior to it. I was asked to go along to observe and report what I saw. I was informed of the location of the protest 1 hour before it was due to commence. The manner in which my involvement is described in the witness statement of Hobson brings into question his ability to be a credible and reliable witness.

I will contact you again in 10-14 days time with photographs, videos and my own witness testimonies which will illustrate the above points and add clarity to the documents sent out to me: material which I am sure the claimants will find most useful in deciding whether it is appropriate for me to remain as a named defendant but also to educate them with regard to the full facts and context of the incidents described so inadequately (and in some places inaccurately) by their witness Mr Hobson. Thus armed, your claimants may then be able to more reliably determine what corrective action should be taken with their contractors operations going forward and what more immediate corrective action regarding the order might be desirable.

Yours faithfully,
Caroline Thomson-Smith

On Sun, 2 Apr 2023 at 22:11, Caroline Thomson-Smith [REDACTED] wrote:

To whom it may concern,

I note that as of 27th March 2023, HS2 Ltd seek to add me as a named defendant to the application for an extension of the routewide injunction granted in 2022.

Having sought legal advice, I request that I am removed as a named defendant from the amended particulars of the application.

This is on the basis that the statements made by James Hobson and Groves upon which your justification for adding me as a named defendant is based are inaccurate, misleading, full of hyperbole and misrepresent the facts. There is no evidence to suggest that I breached the injunction on the 6th October or engaged in any unlawfulness on the 5th February or during the XR protest in London.

You should note that serving notice of your application to me on 27th March leaves only 2 weeks and 1 day to provide a statement and all supporting evidence to the court by 11th April which I feel is very short notice and unfair. I therefore ask that you reply to my request to be removed as a named defendant by Tuesday, 4th April at the latest in order for me to prepare my statement for the court.

Yours sincerely,
Caroline Thomson-Smith

On Mon, 27 Mar 2023, 15:06 HS2Injunction, <HS2Injunction@dlapiper.com> wrote:

Dear Ms Thomson-Smith

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 16 March 2023 below.

Please note that, in accordance with Paragraph 11 of the Directions Order, the Claimants have made an application to the Court ahead of the Review Hearing and have now filed a draft order and their evidence.

We attach by way of service upon you:

- (1) Application Notice;
- (2) Draft Order;
- (3) Amended Particulars of Claim;
- (4) First Witness Statement of James Dobson;
- (5) Eleventh Witness Statement of Julie Dilcock; and
- (6) First Witness Statement of John Groves (with Exhibit).

Please note that the Witness Statements of James Dobson and Julie Dilcock listed above at (4) and (5) refer to non-video Exhibits, copies of which can be found at <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>. The Witness Statement of James Dobson listed at (4) above also refers to video evidence which can be viewed at <https://vimeo.com/showcase/exhibit-JD6>.

All of the documents listed above have also been placed on <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

You will note from the Application documents that the Claimants are asking the Court, at the Review Hearing, to vary and extend the Injunction Order and to add you to the Injunction Order as a Named Defendant.

In accordance with paragraph 12 of the Directions Order any person seeking to amend (including discharge) the Injunction Order, or oppose any applications made by the Claimants, must file and serve a statement of case and any evidence upon which they seek to rely by emailing or posting it to the Court and the Claimants at the addresses listed in the Directions Order, by 4 pm on 11 April 2023.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 16 March 2023 21:38

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 13 March 2023 below and now attach by way of service a copy of the Directions Order that has been made by the court.

The Directions Order sets out at paragraphs 9 – 17 the requirements for the conduct of these court proceedings up to the Review Hearing on 16 May 2023.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 13 March 2023 22:11

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to the order made in these court proceedings by Mr. Justice Julian Knowles on 20 September 2022 (the “**Injunction Order**”).

The Injunction Order took immediate effect and presently runs until 23:59 on 31 May 2023, subject to a requirement that it be reviewed on a yearly basis.

The court has listed a hearing at which the Injunction Order will be reviewed. This will take place on Tuesday 16 May 2023 at 10:30am at the Birmingham Civil and Family Justice Hearing Centre with a time estimate of 1 day (the “**Review Hearing**”). The Claimants have placed details of the Review Hearing on the HS2 Proceedings Website as required by the Injunction Order – [here](#).

Ahead of the Review Hearing, the Claimants have applied to the court for directions for the conduct of these court proceedings up to the Review Hearing (the “**Directions Application**”).

A copy of the Directions Application is attached to this email by way of service on you. It includes:

- 1.Application Notice;
- 2.Claimants' Skeleton Argument for Directions
- 3.Tenth Witness Statement of Julie Dilcock
- 4.Draft Order for Directions
- 5.Claimants' Directions Application Bundle

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

Mary Barraclough

From: HS2Injunction
Sent: 20 April 2023 23:48
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

From: Caroline Thomson-Smith
Sent: Thursday, April 20, 2023 11:47:14 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: HS2Injunction
Cc: KB.Birmingham@justice.gov.uk
Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

****EXTERNAL****

Dear Sir/Madam,

Owing to the amount of corrective information I need to submit, technical difficulties in respect of attaching substantiating video and photographs, work and other commitments, it is not possible for me to submit my comments by tomorrow 4pm.

I will submit the material as soon after the weekend as possible, hopefully over the weekend

Yours sincerely,
Ms Thomson-Smith

On Tue, 18 Apr 2023, 15:31 HS2Injunction, <HS2Injunction@dlapiper.com> wrote:

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

In accordance with Paragraph 14 of the Directions Order, the Claimants have placed draft hearing bundle indices on the RWI Updated Website. A link to the website can be found below.

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

By 4pm on 21 April 2023, any person who wishes to comment on the draft hearing bundle, must notify the Claimants of their comments by email to HS2Injunction@dlapiper.com.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 17 April 2023 15:53

To: HS2Injunction <HS2Injunction@dlapiper.com>

Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 27 March 2023 below.

Please note that, in accordance with Paragraph 13 of the Directions Order, the Claimants have filed evidence in response. A copy of that evidence can be found at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 06 April 2023 15:24

To: HS2Injunction <HS2Injunction@dlapiper.com>

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 27 March 2023 below, and now attach a copy of an Order that has been made by the Court confirming that the Claimants' application dated 27 March 2023 will be heard at the Review Hearing on 16 May 2023.

A copy of the Order has been uploaded to: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings> .

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 27 March 2023 14:56

To: HS2Injunction <HS2Injunction@dlapiper.com>

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 16 March 2023 below.

Please note that, in accordance with Paragraph 11 of the Directions Order, the Claimants have made an application to the Court ahead of the Review Hearing and have now filed a draft order and their evidence. Copies of all the documents filed with the court can be found at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

In accordance with paragraph 12 of the Directions Order any person seeking to amend (including discharge) the Injunction Order, or oppose any applications made by the Claimants, must file and serve a statement of case and any evidence upon which they seek to rely by emailing or posting it to the Court and the Claimants at the addresses listed in the Directions Order, by 4 pm on 11 April 2023.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 16 March 2023 21:38
To: Undisclosed recipients:
Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 13 March 2023 below and now attach by way of service a copy of the Directions Order that has been made by the court.

The Directions Order sets out at paragraphs 9 – 17 the requirements for the conduct of these court proceedings up to the Review Hearing on 16 May 2023.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 13 March 2023 22:11

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to the order made in these court proceedings by Mr. Justice Julian Knowles on 20 September 2022 (the **"Injunction Order"**).

The Injunction Order took immediate effect and presently runs until 23:59 on 31 May 2023, subject to a requirement that it be reviewed on a yearly basis.

The court has listed a hearing at which the Injunction Order will be reviewed. This will take place on Tuesday 16 May 2023 at 10:30am at the Birmingham Civil and Family Justice Hearing Centre with a time estimate of 1 day (the **"Review Hearing"**). The Claimants have placed details of the Review Hearing on the HS2 Proceedings Website as required by the Injunction Order – [here](#).

Ahead of the Review Hearing, the Claimants have applied to the court for directions for the conduct of these court proceedings up to the Review Hearing (the **"Directions Application"**).

A copy of the Directions Application is attached to this email by way of service on you. It includes:

1. Application Notice;
2. Claimants' Skeleton Argument for Directions
3. Tenth Witness Statement of Julie Dilcock
4. Draft Order for Directions
5. Claimants' Directions Application Bundle

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

HS2Injunction

From: HS2Injunction
Sent: 26 April 2023 17:09
To: 'Caroline Thomson-Smith'
Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Tracking:	Recipient	Delivery
	'Caroline Thomson-Smith'	
	Robert Shaw	
	Saffron Goldberg	
	'380900_401 Route_Wide Injunction _ Review Hearing Emails'	
	[REDACTED]	Delivered: 26/04/2023 17:09
	[REDACTED]	Delivered: 26/04/2023 17:09

Dear Ms. Thomson-Smith

We refer to the above matter and to previous correspondence.

We refer specifically to your email of 20 April 2023 (below) sent to this firm and copied to KB.Birmingham@justice.gov.uk, setting out that you would be submitting material over or after the weekend.

As previously advised in our emails to you dated 6 and 13 April 2023, the deadline for you to file and serve any evidence upon which you seek to rely in opposition to the applications made by the Claimants was 4 pm on 11 April 2023, as per paragraph 12 of the Directions Order made by the Court on 15 March 2023. That deadline was decided by the Court, not by the Claimants, and has now passed. No evidence has been received from you.

Further to our email of 18 April 2023, we have similarly received no comments from you on the draft hearing bundle indices.

On that basis, if you intend to now place any material before the Court at the Review Hearing on 16 May 2023, it will be necessary for you to place those documents in a separate bundle, which you will need to prepare and provide to the Court and ourselves before the Review Hearing. The Claimants will not be including any materials you now supply within the Hearing Bundles that they are producing on the basis that any such material will have been filed by you out of time.

It will be for the Court to decide whether or not to permit you to adduce your evidence out of time, and in this respect, a formal application notice will be required by the Court.

Yours faithfully

DLA Piper UK LLP

From: Caroline Thomson-Smith [REDACTED]
Sent: 20 April 2023 23:47
To: HS2Injunction <HS2Injunction@dlapiper.com>
Cc: KB.Birmingham@justice.gov.uk
Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

****EXTERNAL****

Dear Sir/Madam,

Owing to the amount of corrective information I need to submit, technical difficulties in respect of attaching substantiating video and photographs, work and other commitments, it is not possible for me to submit my comments by tomorrow 4pm.

I will submit the material as soon after the weekend as possible, hopefully over the weekend

Yours sincerely,

Ms Thomson-Smith

On Tue, 18 Apr 2023, 15:31 HS2Injunction, <HS2Injunction@dlapiper.com> wrote:

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

In accordance with Paragraph 14 of the Directions Order, the Claimants have placed draft hearing bundle indices on the RWI Updated Website. A link to the website can be found below.

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

By 4pm on 21 April 2023, any person who wishes to comment on the draft hearing bundle, must notify the Claimants of their comments by email to HS2Injunction@dlapiper.com.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 17 April 2023 15:53

To: HS2Injunction <HS2Injunction@dlapiper.com>

Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 27 March 2023 below.

Please note that, in accordance with Paragraph 13 of the Directions Order, the Claimants have filed evidence in response. A copy of that evidence can be found at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 06 April 2023 15:24

To: HS2Injunction <HS2Injunction@dlapiper.com>

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 27 March 2023 below, and now attach a copy of an Order that has been made by the Court confirming that the Claimants' application dated 27 March 2023 will be heard at the Review Hearing on 16 May 2023.

A copy of the Order has been uploaded to: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings> .

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 27 March 2023 14:56

To: HS2Injunction <HS2Injunction@dlapiper.com>

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 16 March 2023 below.

Please note that, in accordance with Paragraph 11 of the Directions Order, the Claimants have made an application to the Court ahead of the Review Hearing and have now filed a draft order and their evidence. Copies of all the documents filed with the court can be found at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

In accordance with paragraph 12 of the Directions Order any person seeking to amend (including discharge) the Injunction Order, or oppose any applications made by the Claimants, must file and serve a statement of case and any evidence upon which they seek to rely by emailing or posting it to the Court and the Claimants at the addresses listed in the Directions Order, by 4 pm on 11 April 2023.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 16 March 2023 21:38

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 13 March 2023 below and now attach by way of service a copy of the Directions Order that has been made by the court.

The Directions Order sets out at paragraphs 9 – 17 the requirements for the conduct of these court proceedings up to the Review Hearing on 16 May 2023.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 13 March 2023 22:11

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to the order made in these court proceedings by Mr. Justice Julian Knowles on 20 September 2022 (the **"Injunction Order"**).

The Injunction Order took immediate effect and presently runs until 23:59 on 31 May 2023, subject to a requirement that it be reviewed on a yearly basis.

The court has listed a hearing at which the Injunction Order will be reviewed. This will take place on Tuesday 16 May 2023 at 10:30am at the Birmingham Civil and Family Justice Hearing Centre with a time estimate of 1 day (the **"Review Hearing"**). The Claimants have placed details of the Review Hearing on the HS2 Proceedings Website as required by the Injunction Order – [here](#).

Ahead of the Review Hearing, the Claimants have applied to the court for directions for the conduct of these court proceedings up to the Review Hearing (the **"Directions Application"**).

A copy of the Directions Application is attached to this email by way of service on you. It includes:

1. Application Notice;
2. Claimants' Skeleton Argument for Directions
3. Tenth Witness Statement of Julie Dilcock
4. Draft Order for Directions
5. Claimants' Directions Application Bundle

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

Mary Barraclough

From: Chris Butcher [REDACTED]
Sent: 04 April 2023 15:02
To: HS2Injunction
Subject: Re: QB-2022-BHM-000044

****EXTERNAL****

Dear Sir/Madam,

I received a pack of documents from you on 27th March 2023 stating that the Claimants have applied to have my name added to an Injunction Order as a Named Defendant (D67). Unfortunately, as the Managing Director of my own company, I have limited time in my congested diary to focus on this unexpected, and wholly inappropriate, issue.

However, having scanned the key document, I can only find a litany of insinuation, misrepresentation, and embellishment of the facts. Indeed, there are significant, and vital gaps, in the evidence being provided. Fortunately, as a keen amateur photographer, bird watcher and naturalist (the reason for my regular legal visits to HS2 sites), I have access to vast amounts of photographic and video evidence that will fully defend my position against inaccurate accusations. I can only think of one occasion where I might have been near an HS2 site without carrying significant amounts of photographic equipment and a pair of powerful binoculars. It would be a very simple job for someone to confirm this with staff working for the claimants, particularly at Aylesbury.

Therefore, to reduce the workload for yourselves, the claimants and the Court, I would suggest that you follow up on this information and seek to remove my name from the list. Incidentally, I was amused to see that I apparently have an alternative name of "Rob" (you might, again, want to check your sources of information). I can assure you that I have only ever been known by my birth name.

If the Claimants, through yourselves, wish to pursue this issue through the Court, then I am quite happy to do so, particularly given all the evidence that I hold. However, because of my business and family commitments, including dealing with my Father-in-Law's estate following his recent death, the timescales are nigh on impossible. This could obviously be exacerbated by the availability of my lawyers and the upcoming Easter break when I will be away with my family. If this is to be pursued through the Courts, then I am left with little option other to request a time extension.

I'd be grateful if you could provide your feedback on this within the next 24 hours to help facilitate my planning.

Many thanks & best regards
Chris Butcher

Mary Barraclough

From: HS2Injunction
Sent: 05 April 2023 14:53
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: QB-2022-BHM-000044

Follow Up Flag: Follow up
Flag Status: Completed

From: Bali, VikasOn Behalf OfKB.Birmingham
Sent: Wednesday, April 5, 2023 2:52:52 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: Chris Butcher
Cc: HS2Injunction
Subject: RE: QB-2022-BHM-000044

****EXTERNAL****

Dear Sir/Madam

Your email below has been referred to Her Honour Judge Emma Kelly, the Designated Civil Judge, who has commented as follows:

"The order of 15 March 2023 was not made at a hearing. Rather, the order disposed of an application on paper, in accordance with Civil Procedure Rule 23.9. Paragraph 25 of the order sets out the steps that need to be taken if a person wishes to apply to have the order set aside or varied. A formal application notice is required. Litigation cannot be conducted by informal email."

Best regards

Vikas Bali
Business and Property Courts Team
The Business and Property Courts in Birmingham

Tel: 0121 681 3043
BPC.Birmingham@justice.gov.uk
KB.Birmingham@justice.gov.uk

'I am not authorised to bind the Ministry of Justice contractually, nor to make representations or other statements which may bind the Ministry of Justice in any way via electronic means'

"For information on how HMCTS uses personal data about you please see:
<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>"

[Here is how HMCTS uses personal data about you](#)

[Coronavirus \(COVID-19\): courts and tribunals planning and preparation](#)

From: Chris Butcher [REDACTED]
Sent: 05 April 2023 10:59
To: KB.Birmingham <KB.Birmingham@justice.gov.uk>
Cc: KB Issue & Enquiries <KBEnquiries@Justice.gov.uk>
Subject: QB-2022-BHM-000044

Your Honour,

With reference to the above claim, I have forwarded you a copy of an email that I sent to the Claimant's lawyers yesterday. Since I have never been involved in any form of legal proceedings, I may be ignorant of the appropriate process and I have, therefore, also copied KB Enquiries in case I have the incorrect email address.

From a layman's perspective, only having 14 days' notice to prepare and submit a detailed response to the evidence provided, particularly when this has come as totally unexpected, seems unduly prejudicial to this case. It is also my understanding that, in a similar claim last year, there was a period of at least an additional one month given to defendants. I would, therefore, respectfully ask you to consider the contents of my email to DLA Piper below and, in the circumstances, to grant a time extension for submitting my response.

Yours faithfully

Chris Butcher

From: Chris Butcher [REDACTED]
Date: Tuesday, 4 April 2023 at 15:02
To: "HS2Injunction@dlapiper.com" <HS2Injunction@dlapiper.com>
Subject: Re: QB-2022-BHM-000044

Dear Sir/Madam,

I received a pack of documents from you on 27th March 2023 stating that the Claimants have applied to have my name added to an Injunction Order as a Named Defendant (D67). Unfortunately, as the Managing Director of my own company, I have limited time in my congested diary to focus on this unexpected, and wholly inappropriate, issue.

However, having scanned the key document, I can only find a litany of insinuation, misrepresentation, and embellishment of the facts. Indeed, there are significant, and vital gaps, in the evidence being provided. Fortunately, as a keen amateur photographer, bird watcher and naturalist (the reason for my regular legal visits to HS2 sites), I have access to vast amounts of photographic and video evidence that will fully defend my position against inaccurate accusations. I can only think of one occasion where I might have been near an HS2 site without carrying significant amounts of photographic equipment and a pair of powerful binoculars. It would be a very simple job for someone to confirm this with staff working for the claimants, particularly at Aylesbury.

Therefore, to reduce the workload for yourselves, the claimants and the Court, I would suggest that you follow up on this information and seek to remove my name from the list. Incidentally, I was amused to see that I apparently have an alternative name of "Rob" (you might, again, want to check your sources of information). I can assure you that I have only ever been known by my birth name.

If the Claimants, through yourselves, wish to pursue this issue through the Court, then I am quite happy to do so, particularly given all the evidence that I hold. However, because of my business and family commitments, including dealing with my Father-in-Law's estate following his recent death, the timescales are nigh on impossible. This could obviously be exacerbated by the availability of my lawyers and the upcoming Easter break when I will be away with

my family. If this is to be pursued through the Courts, then I am left with little option other to request a time extension.

I'd be grateful if you could provide your feedback on this within the next 24 hours to help facilitate my planning.

Many thanks & best regards
Chris Butcher

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.

Mary Barraclough

From: HS2Injunction
Sent: 06 April 2023 11:03
To: Chris Butcher
Cc: HS2Injunction
Subject: RE: QB-2022-BHM-000044 [DLAP-UKMATTERS.FID6569426]
Attachments: DRAFT undertaking - Christopher Paul Butcher 06.04.2023.pdf

Dear Mr Butcher

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to your email of 4 April 2023 below.

In terms of the length of time afforded to you for filing and serving any evidence upon which you seek to rely in opposition to the applications made by the Claimants (the deadline for which being 4 pm on 11 April 2023), that deadline has been decided by the Court (not by the Claimants) as per paragraph 12 of the Directions Order which was placed on the HS2 Proceedings Website [here](#) on 16 March 2023.

Turning to your request that you be removed as a Named Defendant, it is the Claimants' position that they are required by existing case law to name you as a Defendant to these proceedings on the basis of the evidence set out in the First Witness Statement of James Dobson ("**Dobson 1**"). As detailed at paragraphs 14 and 29 of Dobson 1, it is the Claimants' position that you have breached the Injunction by trespassing upon HS2 Land and have also engaged in unlawful action designed to disrupt and stop works on the HS2 Scheme and cause loss and damage to the Claimants and which is not currently prohibited by the Injunction (further details of these incidents are included at paragraphs 31-45 and 111-142 of Dobson 1).

If it is the case that you do not intend to trespass on the HS2 Land again or to engage in any unlawful action designed to disrupt and stop works on the HS2 Scheme and cause loss and damage to the Claimants and which is not currently prohibited by the Injunction, then the Claimants would be prepared to reach an agreement with you that would mean you would not be added as a Named Defendant these proceedings and confirm that they would not seek a costs order against you.

Please find attached the form of undertaking to the Court that the Claimants would be prepared to agree in order to not add you as a Named Defendant to these proceedings with no order as to costs.

We recommend that you take independent legal advice from a solicitor or citizens advice bureau if you are unsure about the terms of the undertaking and the implications of signing it, or any of the documentation you have received.

We look forward to receiving the undertaking from you – signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by us on behalf of the Claimants.

Yours faithfully

DLA Piper UK LLP



From: Chris Butcher <[REDACTED]>
Sent: 04 April 2023 15:02
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: Re: QB-2022-BHM-000044

****EXTERNAL****

Dear Sir/Madam,

I received a pack of documents from you on 27th March 2023 stating that the Claimants have applied to have my name added to an Injunction Order as a Named Defendant (D67). Unfortunately, as the Managing Director of my own company, I have limited time in my congested diary to focus on this unexpected, and wholly inappropriate, issue.

However, having scanned the key document, I can only find a litany of insinuation, misrepresentation, and embellishment of the facts. Indeed, there are significant, and vital gaps, in the evidence being provided. Fortunately, as a keen amateur photographer, bird watcher and naturalist (the reason for my regular legal visits to HS2 sites), I have access to vast amounts of photographic and video evidence that will fully defend my position against inaccurate accusations. I can only think of one occasion where I might have been near an HS2 site without carrying significant amounts of photographic equipment and a pair of powerful binoculars. It would be a very simple job for someone to confirm this with staff working for the claimants, particularly at Aylesbury.

Therefore, to reduce the workload for yourselves, the claimants and the Court, I would suggest that you follow up on this information and seek to remove my name from the list. Incidentally, I was amused to see that I apparently have an alternative name of "Rob" (you might, again, want to check your sources of information). I can assure you that I have only ever been known by my birth name.

If the Claimants, through yourselves, wish to pursue this issue through the Court, then I am quite happy to do so, particularly given all the evidence that I hold. However, because of my business and family commitments, including dealing with my Father-in-Law's estate following his recent death, the timescales are nigh on impossible. This could obviously be exacerbated by the availability of my lawyers and the upcoming Easter break when I will be away with my family. If this is to be pursued through the Courts, then I am left with little option other to request a time extension.

I'd be grateful if you could provide your feedback on this within the next 24 hours to help facilitate my planning.

Many thanks & best regards
Chris Butcher

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Between:

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

Claimants

-and-

(D67) CHRISTOPHER PAUL BUTCHER

Defendant

FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

If you the within named Defendant disobey the undertakings set out in this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE DEFENDANT

This order prohibits you from doing the acts set out in paragraph 4 below. You should read it very carefully.

FURTHER TO the Orders made in these proceedings by Julian Knowles J on 20 September 2022 (the "Injunction Order") and by HHJ Kelly on 16 March 2023 (the "Directions Order")

AND UPON the Claimants' application by Application Notice dated 27 March 2023 pursuant to the provisions at paragraphs 15 and 20 of the Injunction Order ("March 2023 Application").

AND UPON Christopher Paul Butcher accepting that he has previously trespassed on the HS2 Land;
and

AND UPON Christopher Paul Butcher giving undertakings to the Court as set out below.

AND UPON Christopher Paul Butcher confirming that he understands and acknowledges that he may nevertheless become Defendant 2, 3, 4 or 68 as a person unknown if he commits any of the acts prohibited in any order of the Court made in these proceedings against those Defendants.

IT IS ORDERED THAT:

1. The Claimants' March 2023 Application as against Christopher Paul Butcher (D67) only is dismissed.
2. There be no order as to costs between the parties.
3. Service of this Order may be effected, as an alternative, by electronic means by email to Christopher Paul Butcher at chris_butcher1449@hotmail.com and such service shall be deemed to be good and sufficient service on the Defendant.

UNDERTAKINGS TO THE COURT

In this Order the “**HS2 Land**” means all of the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme. The extent of the HS2 Land as at the date of these undertakings is shown coloured pink and green on the March 2023 HS2 Land Plans which are available electronically on the RWI Updated Website at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>, and

the “**HS2 Acts**” means the High Speed Rail (London – West Midlands) Act 2017 and the High Speed Rail (West Midlands – Crewe) Act 2021.

4. Christopher Paul Butcher undertakes to the Court promising as follows: -
 - a. Not to enter or remain upon the HS2 Land;
 - b. Not to deliberately obstruct or otherwise interfere with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land;
 - c. Not to interfere with any fence or gate on or at the perimeter of the HS2 Land; or
 - d. Not to, by unlawful means, obstruct, impede, hinder, or delay works or activities authorised by the HS2 Acts, in express or implied agreement or combination with another person with the intention of causing damage to the Claimants.

AND TO BE BOUND BY THESE PROMISES UNTIL 31 MAY 2024

5. Christopher Paul Butcher's promises at paragraph 4 do not prevent Christopher Paul Butcher from:

- a. Exercising his rights of way over any open public right of way over the HS2 Land; or
- b. Exercising his lawful rights over any public highway.

STATEMENT

I understand the undertakings that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized, or I may be sent to prison for contempt of court.

CHRISTOPHER PAUL BUTCHER

Date:

We consent to an order in these terms

DLA PIPER UK LLP

Solicitors for the Claimants

Date:

Mary Barraclough

From: Chris Butcher <[REDACTED]>
Sent: 11 April 2023 10:09
To: qb.birmingham@justice.gov.uk
Cc: HS2Injunction
Subject: Re: QB-2022-BHM-000044

****EXTERNAL****

Your Honour,

I would like to advise the Court, and the Claimant, that I wish to provide some fundamental clarity and corrections to the content and context of the records, as stated in the papers delivered to me on 27th March 2023. I also wish to be unequivocal that, as a layperson with no legal representation, the purpose of my report will not be to enter into any form of litigation on my part. It is purely to advise, inform and assist the recipients in their deliberations.

The suggested factual corrections relate to the following sections of the witness statement of James Dobson:

1. Alleged breach of injunction on 10th October 2022 (paragraphs 31 – 45)
2. Events of 5th February 2022 (paragraphs 117 – 143)

Unfortunately, due to time constraints (previously advised to DLA Piper in my email of 4th April 2023), I will follow up within the next 10-14 days with detailed written, photographic and video evidence to support these recommended corrections.

Given the very serious nature of some of the content, I feel that it would be irresponsible of me not to draw the attention of both the Court, and the Claimant, to this additional information, irrespective of any relevance to my own position. My belief is that the information that I will provide is highly relevant to the practical application of any proposed injunction and should be considered in any deliberations on the matter. The additional information will provide a more comprehensive understanding of the full facts, and the context, related to each section. I believe that the issues raised are significant and will require in depth consideration to determine appropriate remedial action.

Whilst I have operated at the highest levels within global industrial businesses, I do not profess to have a full understanding of the workings of the HS2 organisation and, therefore, I will leave it entirely up to the Court and the Claimant to determine how they might wish to use the information in their discussions, and decision-making processes.

As previously stated, I am not entering into any form of litigation, my comments are purely advisory in nature and should be taken in the spirit in which they are intended. Unless specifically requested by the Court, I have no plans to attend the hearings on 16th May 2023, due to work commitments. However, I remain available should there be any request for further information or clarification.

Yours faithfully,

Chris Butcher

Mary Barraclough

From: HS2Injunction
Sent: 13 April 2023 12:18
To: Chris Butcher
Subject: FW: QB-2022-BHM-000044 [DLAP-UKMATTERS.FID6569426]

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr. Butcher

We refer to your email to the court of 11 April 2023 below and the court's email to you of 5 April 2023.

Whilst you state that you do not intend to enter into any form of litigation on your part, the purported factual corrections you intend to supply suggest that you do oppose at least part of our clients' application.

The Directions Order made by the court on 15 March 2023 is very clear that if you wish to amend the Injunction Order or oppose our clients' application, you must file with the court and serve a statement of case and any evidence upon which you seek to rely by 4pm on 11 April 2023.

That deadline has now passed.

Further, the court was clear in its email to you of 5 April 2023 that if you wish to vary or set aside the Directions Order, a formal application notice is required and informal emails will not suffice.

If you now intend to submit evidence after the deadline in the Directions Order a formal application will need to be made to the court for this evidence to be admitted. Our clients expect that application to be made in sufficient time ahead of the hearing listed for 16 May 2023 in order that they have time to: (i) consider that application; (ii) file evidence in response (if necessary); and (iii) have a viable amount of time to prepare for the hearing.

The Claimants offer that you give written undertakings to the court instead of being added as a Named Defendant to these proceedings, set out in our email of 6 April 2023, remains open for acceptance by you.

Yours sincerely

DLA Piper UK LLP

From: Chris Butcher
Sent: Tuesday, April 11, 2023 10:08:43 AM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: qb.birmingham@justice.gov.uk
Cc: HS2Injunction
Subject: Re: QB-2022-BHM-000044

****EXTERNAL****

Your Honour,

I would like to advise the Court, and the Claimant, that I wish to provide some fundamental clarity and corrections to the content and context of the records, as stated in the papers delivered to me on 27th March 2023. I also wish to be unequivocal that, as a layperson with no legal representation, the purpose of my report will not be to enter into any form of litigation on my part. It is purely to advise, inform and assist the recipients in their deliberations.

The suggested factual corrections relate to the following sections of the witness statement of James Dobson:

1. Alleged breach of injunction on 10th October 2022 (paragraphs 31 – 45)
2. Events of 5th February 2022 (paragraphs 117 – 143)

Unfortunately, due to time constraints (previously advised to DLA Piper in my email of 4th April 2023), I will follow up within the next 10-14 days with detailed written, photographic and video evidence to support these recommended corrections.

Given the very serious nature of some of the content, I feel that it would be irresponsible of me not to draw the attention of both the Court, and the Claimant, to this additional information, irrespective of any relevance to my own position. My belief is that the information that I will provide is highly relevant to the practical application of any proposed injunction and should be considered in any deliberations on the matter. The additional information will provide a more comprehensive understanding of the full facts, and the context, related to each section. I believe that the issues raised are significant and will require in depth consideration to determine appropriate remedial action.

Whilst I have operated at the highest levels within global industrial businesses, I do not profess to have a full understanding of the workings of the HS2 organisation and, therefore, I will leave it entirely up to the Court and the Claimant to determine how they might wish to use the information in their discussions, and decision-making processes.

As previously stated, I am not entering into any form of litigation, my comments are purely advisory in nature and should be taken in the spirit in which they are intended. Unless specifically requested by the Court, I have no plans to attend the hearings on 16th May 2023, due to work commitments. However, I remain available should there be any request for further information or clarification.

Yours faithfully,

Chris Butcher

Mary Barraclough

From: HS2Injunction
Sent: 18 April 2023 09:38
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: QB-2022-BHM-000044

Follow Up Flag: Follow up
Flag Status: Completed

From: Chris Butcher
Sent: Tuesday, April 18, 2023 9:37:36 AM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: qb.birmingham@justice.gov.uk
Cc: HS2Injunction
Subject: Re: QB-2022-BHM-000044

****EXTERNAL****

Your Honour,

Following my email of 11th April below, I am very close to completing a submission that provides fundamental clarity and corrections to the content and context of the records, as stated in the papers delivered to me on 27th March 2023. The purpose of my submission is to advise, inform and assist the recipients in their deliberations.

However, having prepared a document containing written, photographic and video evidence to support the recommended corrections, the file is very large. Since I have prepared this as a layperson, with no legal representation, I am seeking advice on how to best provide both yourselves, and the claimants, with the full document. Unfortunately, in its current format, it is far too large to send via email.

Essentially, I am looking for access to technical resource who can advise me on how best to deliver the full document to you, particularly bearing in mind that this is additional information rather than documents to support any form of litigation.

Any support and/or guidance is much appreciated.

Yours faithfully,

Chris Butcher

From: Chris Butcher [REDACTED]
Date: Tuesday, 11 April 2023 at 10:08
To: "qb.birmingham@justice.gov.uk" <qb.birmingham@justice.gov.uk>
Cc: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: Re: QB-2022-BHM-000044

Your Honour,

I would like to advise the Court, and the Claimant, that I wish to provide some fundamental clarity and corrections to the content and context of the records, as stated in the papers delivered to me on 27th

March 2023. I also wish to be unequivocal that, as a layperson with no legal representation, the purpose of my report will not be to enter into any form of litigation on my part. It is purely to advise, inform and assist the recipients in their deliberations.

The suggested factual corrections relate to the following sections of the witness statement of James Dobson:

1. Alleged breach of injunction on 10th October 2022 (paragraphs 31 – 45)
2. Events of 5th February 2022 (paragraphs 117 – 143)

Unfortunately, due to time constraints (previously advised to DLA Piper in my email of 4th April 2023), I will follow up within the next 10-14 days with detailed written, photographic and video evidence to support these recommended corrections.

Given the very serious nature of some of the content, I feel that it would be irresponsible of me not to draw the attention of both the Court, and the Claimant, to this additional information, irrespective of any relevance to my own position. My belief is that the information that I will provide is highly relevant to the practical application of any proposed injunction and should be considered in any deliberations on the matter. The additional information will provide a more comprehensive understanding of the full facts, and the context, related to each section. I believe that the issues raised are significant and will require in depth consideration to determine appropriate remedial action.

Whilst I have operated at the highest levels within global industrial businesses, I do not profess to have a full understanding of the workings of the HS2 organisation and, therefore, I will leave it entirely up to the Court and the Claimant to determine how they might wish to use the information in their discussions, and decision-making processes.

As previously stated, I am not entering into any form of litigation, my comments are purely advisory in nature and should be taken in the spirit in which they are intended. Unless specifically requested by the Court, I have no plans to attend the hearings on 16th May 2023, due to work commitments. However, I remain available should there be any request for further information or clarification.

Yours faithfully,

Chris Butcher

Mary Barraclough

From: HS2Injunction
Sent: 21 April 2023 16:52
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]
Attachments: HS2 Named Final.pdf

From: Chris Butcher
Sent: Friday, April 21, 2023 4:51:04 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: qb.birmingham@justice.gov.uk
Cc: HS2Injunction
Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

****EXTERNAL****

Your Honour,

I have attached a document that responds to the Witness Statement of James Dobson. As previously stated, I have prepared this document as a layperson, with no legal representation and it is not intended as any form of litigation. The purpose is to advise, inform and assist the recipients in their deliberations.

My submission seeks to provide some fundamental clarity and corrections to the content and the context of the witness statement of James Dobson. I have submitted it in my own format but would be happy to re-format it, if required by the Court. I have referenced three video clips in my submission with screenshots. I will seek advice over the weekend on how to submit these video clips in full.

I have provided a summary at the end of the document but would advise a full reading of the submission to bring clarity to the points being made.

As previously notified, I am not planning to attend the Review Hearing on 16th May, due to work commitments. However, should the Court request me to do so, I will seek to make alternative arrangements. Similarly, if the Court wishes to raise any questions, or points of clarification, in advance of the Review Hearing, I will make myself available.

Yours faithfully
Chris Butcher

From: HS2Injunction <HS2Injunction@dlapiper.com>
Date: Tuesday, 18 April 2023 at 15:31
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam

Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

In accordance with Paragraph 14 of the Directions Order, the Claimants have placed draft hearing bundle indices on the RWI Updated Website. A link to the website can be found below.

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

By 4pm on 21 April 2023, any person who wishes to comment on the draft hearing bundle, must notify the Claimants of their comments by email to HS2Injunction@dlapiper.com.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 17 April 2023 15:53
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam

Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 27 March 2023 below.

Please note that, in accordance with Paragraph 13 of the Directions Order, the Claimants have filed evidence in response. A copy of that evidence can be found at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 06 April 2023 15:24
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam

Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 27 March 2023 below, and now attach a copy of an Order that has been made by the Court confirming that the Claimants' application dated 27 March 2023 will be heard at the Review Hearing on 16 May 2023.

A copy of the Order has been uploaded to: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings> .

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 27 March 2023 14:56
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 16 March 2023 below.

Please note that, in accordance with Paragraph 11 of the Directions Order, the Claimants have made an application to the Court ahead of the Review Hearing and have now filed a draft order and their evidence. Copies of all the documents filed with the court can be found at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

In accordance with paragraph 12 of the Directions Order any person seeking to amend (including discharge) the Injunction Order, or oppose any applications made by the Claimants, must file and serve a statement of case and any evidence upon which they seek to rely by emailing or posting it to the Court and the Claimants at the addresses listed in the Directions Order, by 4 pm on 11 April 2023.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 16 March 2023 21:38
To: Undisclosed recipients:
Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 13 March 2023 below and now attach by way of service a copy of the Directions Order that has been made by the court.

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Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 13 March 2023 22:11

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

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(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

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1. Application Notice;
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3. Tenth Witness Statement of Julie Dilcock
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5. Claimants' Directions Application Bundle

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Yours faithfully

DLA Piper UK LLP

Mary Barraclough

From: HS2Injunction
Sent: 25 April 2023 09:34
To: Robert Shaw; Mary Barraclough; Stephanie Owens
Subject: FW: QB-2022-BHM-000044 : Video B & Video C
Attachments: Video B.mp4; Video C.mov

Follow Up Flag: Follow up
Flag Status: Completed

From: Chris Butcher
Sent: Tuesday, April 25, 2023 9:32:05 AM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: qb.birmingham@justice.gov.uk
Cc: HS2Injunction
Subject: Re: QB-2022-BHM-000044 : Video B & Video C

****EXTERNAL****

Your Honour,

I have now attached Video B and Video C as referred to in my previous email.

Yours faithfully,
Chris Butcher

From: Chris Butcher [REDACTED]
Date: Tuesday, 25 April 2023 at 09:27
To: "qb.birmingham@justice.gov.uk" <qb.birmingham@justice.gov.uk>
Cc: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: QB-2022-BHM-000044 : Video A

Your Honour,

Following some technical advice, I have managed to resize my video clips to enable me to email them.

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I hope that this video will make it very clear that we purely followed a well-worn public footpath, as did other walkers and cyclists, that continued beyond, what we were later informed to be, the boundary of HS2 land. The boundary had no signage or fencing to indicate otherwise. The lack of signage and fencing was subsequently corrected by EKFB.

Video B and Video C will follow in a separate email.

Yours faithfully,
Chris Butcher

From: Chris Butcher [REDACTED] >
Date: Friday, 21 April 2023 at 16:50
To: "qb.birmingham@justice.gov.uk" <qb.birmingham@justice.gov.uk>
Cc: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

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I have attached a document that responds to the Witness Statement of James Dobson. As previously stated, I have prepared this document as a layperson, with no legal representation and it is not intended as any form of litigation. The purpose is to advise, inform and assist the recipients in their deliberations.

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From: HS2Injunction <HS2Injunction@dlapiper.com>
Date: Tuesday, 18 April 2023 at 15:31
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: RE: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam

Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

In accordance with Paragraph 14 of the Directions Order, the Claimants have placed draft hearing bundle indices on the RWI Updated Website. A link to the website can be found below.

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

By 4pm on 21 April 2023, any person who wishes to comment on the draft hearing bundle, must notify the Claimants of their comments by email to HS2Injunction@dlapiper.com.

Yours faithfully

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From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 17 April 2023 15:53
To: HS2Injunction <HS2Injunction@dlapiper.com>
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DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 06 April 2023 15:24
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

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From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 27 March 2023 14:56
To: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

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HS2Injunction

From: HS2Injunction
Sent: 26 April 2023 17:07
To: 'Chris Butcher'
Subject: RE: QB-2022-BHM-000044 : Video B & Video C [DLAP-UKMATTERS.FID6569426]

Tracking:	Recipient	Delivery
	'Chris Butcher'	
	Robert Shaw	
	Saffron Goldberg	
	'380900_401 Route_Wide Injunction _ Review Hearing Emails'	
	[REDACTED]	Delivered: 26/04/2023 17:07
	[REDACTED]	Delivered: 26/04/2023 17:07

Dear Mr. Butcher

We refer to the above matter and to previous correspondence.

We refer specifically to your emails of 21 and 25 April 2023 (below) sent to qb.birmingham@justice.gov.uk and copied to this firm, attaching (1) your written submissions responding to the witness statement of James Dobson; and (2) videos marked 'A', 'B' and 'C'.

As previously advised in our emails to you dated 6 and 13 April 2023, the deadline for you to file and serve any evidence upon which you seek to rely in opposition to the applications made by the Claimants was 4 pm on 11 April 2023, as per paragraph 12 of the Directions Order made by the Court on 15 March 2023. That deadline was decided by the Court, not by the Claimants, and has now passed.

The Court also advised you by its email dated 5 April 2023 (following your email request for an extension of time for submitting your response) that if you wished to seek to vary or set aside the Directions Order, a formal application notice would be required, and informal emails would not suffice. You have not, so far as we are aware, submitted a formal application notice to the Court. If you have submitted a formal application notice to the Court a copy of that application notice should be sent to this firm.

Further to our email of 18 April 2023, we have also not received any comments from you on the draft hearing bundle indices.

On that basis, if you wish to place the material attached to your emails of 21 and 25 April 2023 before the Court at the Review Hearing on 16 May 2023, it will be necessary for you to place those documents in a separate bundle, which you will need to prepare and provide to the Court and ourselves before the Review Hearing. The Claimants will not be including your materials within the Hearing Bundles that they are producing on the basis that the material was filed by you out of time.

It will be for the Court to decide whether or not to permit you to adduce your evidence out of time, and in this respect, a formal application notice will be required by the Court.

Yours faithfully

DLA Piper UK LLP

From: Chris Butcher [REDACTED]
Sent: 25 April 2023 09:32
To: qb.birmingham@justice.gov.uk

Cc: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: Re: QB-2022-BHM-000044 : Video B & Video C

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Date: Tuesday, 25 April 2023 at 09:27
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Cc: HS2Injunction <HS2Injunction@dlapiper.com>
Subject: QB-2022-BHM-000044 : Video A

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From: HS2Injunction <HS2Injunction@dlapiper.com>
Sent: 17 April 2023 15:53
To: HS2Injunction <HS2Injunction@dlapiper.com>
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From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 27 March 2023 14:56

To: HS2Injunction <HS2Injunction@dlapiper.com>

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To: HS2Injunction
Cc: [REDACTED]
Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

****EXTERNAL****

Dear DLA Piper UK LLP

Let me ask you one question:

How can a legal **injunction** based upon **lies and failures** not be, (by definition of a requirement for truth to make the law stand up without being a total hypocrisy), null and void?

First of all lies:

HS2Ltd. insists that they close footpaths for reasons of safety.

Whoever decided that obviously drives everywhere and is not a pedestrian. Pedestrians are well acquainted with crossing dangerous roads. They are, in fact, experts in negotiating a way past potential danger in a safe and careful way. The claim is irrelevant to the point of being a falsification of the truth.

Second, failure:

Failure to keep to schedule, restricting public access to footpaths unnecessarily when, due to delays, dangerous work was not present at the location of the restricted access. Worse! We are denied access for even longer.

Summary:

HS2 Ltd. impose an injunction for reasons other than for the reasons which they have stated, so truth is breached, or are not remaining true to their claimed objective of being 'Considerate Constructors'. (More lies). Yet HS2 Ltd. and the British Government expect the British People to just sit back and let democracy be bulldozed.



Thank you Brexit, thank you Conservatives, thank you HS2, thank you British legal system (which is clearly not fit for purpose) for blighting our lives.

Alan Cooper.

On Mon, 27 Mar 2023 at 14:55, HS2Injunction <HS2Injunction@dlapiper.com> wrote:

Dear Sir/Madam,

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Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 13 March 2023 22:11

To: Undisclosed recipients:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others [DLAP-UKMATTERS.FID6569426]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to the order made in these court proceedings by Mr. Justice Julian Knowles on 20 September 2022 (the “**Injunction Order**”).

The Injunction Order took immediate effect and presently runs until 23:59 on 31 May 2023, subject to a requirement that it be reviewed on a yearly basis.

The court has listed a hearing at which the Injunction Order will be reviewed. This will take place on Tuesday 16 May 2023 at 10:30am at the Birmingham Civil and Family Justice Hearing Centre with a time estimate of 1 day (the **“Review Hearing”**). The Claimants have placed details of the Review Hearing on the HS2 Proceedings Website as required by the Injunction Order – [here](#).

Ahead of the Review Hearing, the Claimants have applied to the court for directions for the conduct of these court proceedings up to the Review Hearing (the **“Directions Application”**).

A copy of the Directions Application is attached to this email by way of service on you. It includes:

1. Application Notice;
2. Claimants’ Skeleton Argument for Directions
3. Tenth Witness Statement of Julie Dilcock
4. Draft Order for Directions
5. Claimants’ Directions Application Bundle

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

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