

On behalf of: Claimants
J.A.Dilcock
2nd statement of witness
Exhibits: JAD4 and JAD5
Date: 1 April 2022

Claim No. QBD-2022-BHM-000044

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & ORS

Defendants

**EXHIBIT JAD4 TO THE
SECOND WITNESS STATEMENT OF JULIE AMBER DILCOCK**

Notice

HS2 route-wide injunction proceedings

Information regarding HS2 route-wide injunction proceedings. These exhibits contain strong and/or abusive language and scenes of violence that some may find disturbing.

From: [High Speed Two \(HS2\) Limited](#)

Published 30 March 2022

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Documents

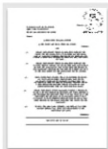


[1. Claim Form HS2 & Or v PU & Ors 25.03.2022](#)

PDF, 1.01 MB, 4 pages

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[2. Particulars of Claim HS2 & Or v PU & Ors 25.03.2022](#)

PDF, 1.56 MB, 9 pages



[3. Plan A](#)

PDF, 541 KB, 1 page

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[4. Schedule of Defendants](#)

PDF, 87.3 KB, 3 pages



[5. N244 Application Notice HS2 & Or v PU & Ors 25.03.2022](#)

PDF, 130 KB, 4 pages



[6. Draft Order](#)

PDF, 110 KB, 19 pages



[7. HS2 Land Plans - Part 1](#)

PDF, 56.4 MB, 142 pages

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[8. HS2 Land Plans - Part 2](#)

PDF, 52.5 MB, 141 pages

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[9. Table 1 HS2 Acquired Land GVDs](#)

PDF, 1.07 MB, 86 pages



[10. Table 2 HS2 GVDs with Title Numbers](#)

PDF, 172 KB, 13 pages



[11. Table 3 HS2 Acquired Land non GVDs](#)

PDF, 352 KB, 11 pages



[12. Table 4 HS2 Temporary Possession - Schld16 and Schld15](#)

PDF, 1.03 MB, 81 pages



[13. Witness statement of Julie Dilcock](#)

PDF, 224 KB, 21 pages



[14. Exhibit JAD3](#)

PDF, 23 MB, 163 pages



[15. Witness Statement of Richard Jordan](#)

PDF, 897 KB, 80 pages



[16. Exhibit RJ1](#)

PDF, 55.7 MB, 269 pages



[17. Notice of hearing on 5 April 2022](#)

PDF, 118 KB, 2 pages

Details

Video exhibit RJ2 can be found by following this link: [Exhibit RJ2](#). The following exhibits contain strong and/or abusive language and scenes of violence that some viewers may find disturbing. Viewer discretion advised.

Published 30 March 2022

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Facebook posts and media articles

<https://crewe.nub.news/n/hs2-protest---activists-refuse-to-leave-woodlands-following- eviction-deadline?fbclid=IwAR1DKqsOdOZuftvEvlj84NOPZ8AH9vsdZ3wqN- OvkMW5gbSS6wHFL6fQPEg>

HS2 protest - activists refuse to leave woodlands following eviction deadline

⊙ Posted: 24.03.22 at 17:00 by [Ryan Parker \(Editor\)](#) and [Richard Price, Local Democracy Reporter](#)

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The HS2 protest at Bluebell Wood, Staffordshire. (Picture credit: LDRS)

HS2 protesters living in a camp for more than a year are refusing to leave - just 20 miles away from Crewe.

Named as the Bluebell Woods Protection Camp, Staffordshire, the area contains more than 40 activists who are furious that the woods will be cut down for HS2.

The western leg of the high speed rail scheme will pass through the site towards Crewe - something the protesters are seeking to prevent going ahead.

One of those at the camp, Ian, said: "They might fell the woods straight away, they might not, but presumably they (HS2) think we're causing enough of a nuisance to them - giving them enough bad publicity to want rid of us basically.

"This is our home as well as woods that we need to protect.

"We're trying to stop the woods being cut down, but it's on quiet a busy road - it's quite a high profile spot - so it's a good opportunity for us to talk to people who are going to be affected by this trainline, which is a lot of people."



The planned HS2 UK route, including Crewe. (Picture credit: Department for Transport)

The camp includes a makeshift visitor's centre with pictures of protesters and information boards.

HS2 believe Phase Two A of the railway (Birmingham to Crewe) will unlock more capacity on the West Coast Mainline.

This could see services between Crewe and Stoke-on-Trent increase from hourly to half-hourly.

Bosses say there will also be more services from Crewe to Runcorn and Crewe to Liverpool - as well as from North Wales to Chester (via Crewe) to London.



Crewe Railway Station today, HS2 plan to modernise it. (Picture credit: Ryan Parker)

The company also says that 78 hectares of native broadleaved woodland will be planted as part of this phase.

Another protester said: "No-one wants HS2. You only have to walk down the high street and mention it and people's faces turn upside down, like, even the thought of it is just disgusting to people.

"Considering how many months ago they (the Government) didn't even have enough money to feed children.

"Now we have millions and we're going to waste it all."

The arrival of HS2 services into Crewe will allow passengers and visitors to the town to benefit from a 225 mph service, travelling between Crewe and the capital in less than an hour.

"Along the railway's route to Crewe, which includes Bluebell Wood, we'll create a new wildlife habitat, including planting 600,000 square metres of woodland."

HS2 Ltd can take a temporary possession of Bluebell Wood from today.

Protesters have been asked to leave and have been moving materials to a second camp, approximately half a mile up the road.

This is to prepare for eviction and to provide more space for the increased number of people coming to resist the eviction.

HS2 is expected to arrive in Crewe between 2029 and 2033.



A protester moving supplies over to a second camp. (Picture credit: Richard Price)

https://www.stokesentinel.co.uk/news/stoke-on-trent-news/hs2-protest-camp-staffordshire-survives-6856352?fbclid=IwAR2UL6KkemY8isTsP1YvmpV-xtQEldMsoqvtc_14dhUH92I9FkOJ6GY39rc

HS2 protest camp in Staffordshire survives another day

The campaigners were due to be evicted on Thursday




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By [Richard Price](#) Local Democracy Reporter
06:00, 25 MAR 2022

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In    YourArea



 The protest camp is still in place (Image: Copyright Unknown)

Protesters camped out near the site of a proposed high-speed rail line have been given a stay of execution. HS2 Ltd served evictions papers, demanding they vacate the site near Swynnerton by yesterday (March 24).

But [StokeonTrentLive spent the day at the camp on Thursday](#) and no enforcement action has so far taken place. It could be because HS2 want to avoid any negative publicity associated with the enforced removal of protesters, although those at the camp fear the eviction could be acted upon any day.

One of the protesters, Steph, said: "I think that it could still be a little while yet [before we're evicted] because they probably expect people to come for the end of the 28-day notice. We're assuming that the eviction will be any day now.

READ: [Drivers face £200 fines under new mobile phone laws from today](#)

"But they'll probably leave it for a few weeks and just hope that we get bored, so to speak, but we'll stand our ground. At some camps, it could be as soon as the end of the notice has come about, but sometimes they'll leave it for months on end.

"At Wendover camp - that was an HS2 camp - that was about two and half months after the notice. In some ways, you can see that as every day is a blessing - the camp's still there, which it is amazing because we're trying to protect this woodland.

"But at the same time, it can cause a lot of stress because you don't know where you're at. I really like to now what I'm up in the next week, and coming months, so I really don't know when that's the situation, when we've got an eviction hanging over our heads."



The camp has been given a stay of execution (Image: Copyright Unknown)

The protesters say they are working to resist eviction. There's a tunnel at the camp which some have said they'll occupy, and there are multiple tree houses which protesters have vowed to attach themselves to if needed.

The protesters say they are working to resist eviction. There's a tunnel at the camp which some have said they'll occupy, and there are multiple tree houses which protesters have vowed to attach themselves to if needed.

"It's just a really beautiful woodland and it needs to stay, so I'll do what I can to keep it here," added Steph. "But don't get me wrong, it's not just about the woodland, it's about HS2 as a whole and the ridiculous amount of money that that's going to cost.

"It could be spent on other things - like, for the people of this country. But yeah, it certainly is about the woodland too, I really care about wildlife."

In the past few days, a second camp has begun to spring up around half a mile up the road from the main camp. Speaking about the new camp, Steph said: "I suppose it's about covering all bases really.

"It is a back-up camp but, then at the same time, I think it will probably develop into a whole new camp really. I suppose if the day ever comes when this camp goes then that will take its place.

"It'll certainly serve a purpose and it's quite near the security too - where they're working on the compound. It's near where all the diggers are ripping up the ground, so I suppose there'll be scope for people to possibly get in the way of HS2."

While the second camp is not yet as well-established as the first, there's already a loo and a treehouse there. There are also a large number of wooden pallets, which protesters say they'll use to construct a tower.

Protester Nigel said: "We've set up this because there's an imminent eviction on Bluebell [camp]. This is like our response to that eviction threat really.

"Obviously, we're not prepared to give up the fight just because we're being pushed off that in a day or so. "Once people start to be evicted from that site, people will be coming onto this site.

"We've got defences on here that we'll be manning - so we've already got defences on here and we'll be building more, and more shelters." He spoke of past experiences on camps and dealing with the bailiffs.

"Tunnel bailiffs are usually really good. They'll work with people, because it's all about safety," he added. "I've heard some of the tree eviction bailiffs can be quite rough and quite underhand in their roughness."

Asked about the risk to protesters' personal safety from concealing themselves in tunnels or attaching themselves to trees, he said: "To a degree, it's what risk are the people evicting them going to put them at? So, obviously, if you're up a tree and you're chained to something there is a risk involved. But if people are a bit more sensitive in how they try to remove them from trees, it mitigates a lot of that danger.

"We're not deliberately putting ourselves in the way of danger. But we will put ourselves in a position where we think we can protect a tree or a piece of land."

Another protester added: "We know the laws around it. We're know how they're supposed to safely remove us."

The campaigners encouraged locals to use their own means to oppose the high speed line. Nigel said: "Part of the idea of these camps is to try and build public awareness as well.

"So to try and build like a wider community opposition to it - and follow all the normal routes like lobbying MPs, keep on getting onto your parish councils, keeping onto the Government - trying to make them think about it. And even if you don't stop it, trying to mitigate in a better way.

"If you can perhaps save a stand of trees, if you can perhaps get them to think about which road they might be using - do they really need to be widening the road and taking all the trees out on that road?"

"To a degree, there's a sense of inevitability, but like all of our hopes would be still there hasn't anywhere been an inch of track laid, so the eastern leg was shelved. There's nothing to say that this could not still be stopped.

"The escalating costs of it - the escalating costs of fuel, of everything else. The cost of this is spiralling all the time and it could be at some point they go, like, well actually it isn't worth doing.

"And the more we can delay it, the more the technology they're talking about having is going to obsolete before it's up and running. "If we can keep delaying it and delaying it, perhaps it is still winnable."

HS2 Ltd has been contacted for comment. The company said it won't discuss plans or provide a running commentary on eviction operations.



Bluebell Woods Protection Camp

March 25 at 1:59 PM · 🌐



Not too late to be apart of something and resist HS2 and all it stands for!

<https://www.bbc.co.uk/.../uk-england-stoke-staffordshire...>



BBC.COM

HS2 protesters waiting for eviction to begin after papers served

<https://www.bbc.co.uk/news/uk-england-stoke-staffordshire-60872444?fbclid=IwAR0J5hYFWcZC8BU2eEgtgxfu7cmND8iEEqkuQ7dIL1WOitSEIET3rxDJ9E>

HS2 protesters waiting for eviction to begin after papers served

🕒 6 days ago



| The protection camp group has been taking action over phase 2a of the line from Fradley to Crewe

A group of HS2 protesters at a camp in Staffordshire are still on site a day after they were due to be evicted.

A group of HS2 protesters at a camp in Staffordshire are still on site a day after they were due to be evicted.

HS2 Ltd had served evictions papers demanding they vacate the site near Swynnerton by 24 March.

But the group said it was not expecting to get moved on straight away, had no plans to leave voluntarily and would resist any forced eviction.

One of the protesters, Steph, said: "They'll probably leave it for a few weeks and just hope that we get bored."

They are opposing the construction of the high speed railway between Fradley and Crewe.

The **Local Democracy Reporting Service**, which spoke to the protesters, said they had dug a tunnel and built tree houses to make any eviction more difficult.

There are also a large number of wooden pallets, which they said they would use to construct a tower.

Steph said he had no idea when that might come and added: "At some camps, it could be as soon as the end of the notice has come about, but sometimes they'll leave it for months on end."

He said the waiting can cause "a lot of stress".

"I really like to now what I'm up in the next week, and coming months, so I really don't know when that's the situation, when we've got an eviction hanging over our heads," he said.

"It's just a really beautiful woodland and it needs to stay, so I'll do what I can to keep it here."



| About 40 people have been living at the woodland site off the A51

Another protester, Nigel, said he had past experience of evictions.


"Tunnel bailiffs are usually really good. They'll work with people, because it's all about safety.

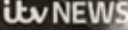

"We're not deliberately putting ourselves in the way of danger, but we will put ourselves in a position where we think we can protect a tree or a piece of land."

He said as well as slowing the progress of the work, he hoped protest camps like this one would help build public awareness.

A spokesperson for HS2 Ltd said the line, once operational, would "provide zero-carbon rail travel from day one" and urged protesters to leave the encampments.

They added the firm was planting seven million trees and shrubs between Birmingham and London, and was creating new wildlife habitats on the route to Crewe.

 **Bluebell Woods Protection Camp**
March 25 at 7:28 AM · 🌐


 

HS2 Rebellion
March 25 at 6:53 AM · 🌐

[Bluebell Woods Protection Camp](#) Resists!
Join the frontline of climate activism, be a part of this resistance 🍌

<https://gofund.me/8ce5b1b6>

[#HS2Resistance](#)
[#StopHS2](#)
[#ResistingAntiTrespass](#)

 ITV Central News 6pm Thursday 24 March

Screenshots from ITV News report showing tunnels:









Screenshots from ITV News report showing satellite camp:



Screen shot of D6:



Screen shot of D7:





Bluebell Woods Protection Camp

March 26 at 12:16 PM · 🌐



Bluebells last stand!

We could be evicted any minute now!

Eviction is becoming more and more imminent!

It's a time of climate crisis, it's nesting season and the bed of beautiful bluebells is about to bloom! We can't let them take this easily on principle! Let's send a message that this is our Amazon and show them the true face of climate activism in this country!

Come and fight for nature! There is a place for you!





Bluebell Woods Protection Camp



March 29 at 9:00 PM · 🌐

We need help building our new camp and with funds for resisting the upcoming eviction for potentially both camps!

We are absolutely smashing it here and working so hard! Please help us because we are the resistance! 🦊 and we keep growing!!

<https://www.gofundme.com/f/bluebell-woods-protection-camp...>





Drew Robson was live.
March 25 at 9:57 AM · 🌐



Numbers needed



👍👍👍 21

14 Comments 17 Shares

👍 Like

💬 Comment

➦ Share

Most relevant ▾



Write a comment...



Press Enter to post.



Claire Moyle · 2:22

They're trying to aggravate ...

Like Reply 6d



Samantha Lewin · 4:25

Wish i could come down, they wouldnt catch me 🙄🙄🙄 ...

Like Reply 6d

↳ Angela McMaster replied · 1 Reply



Andy Wildman · 2:38

No wonder this is costing us billions 😞 ...

Like Reply 6d



Hayley Marie · 3:13

looks windy 🌬️ 😬 ...

Like Reply 6d



Hayley Marie · 1:13

what the hell is the machine for? ...

Like Reply 6d

↳ Andy Wildman replied · 1 Reply



Jane Hurd Cahane · 0:24

Wish I could join you but it's a bit far ...

Like Reply 6d



Groovella Deville · 1:09

Is that main camp? ...

Like Reply 6d



Hazel Ball · 0:00

BB 2 ...

Like Reply 6d



Write a reply...



Press Enter to post.



Lillie Olive Gypsy · 4:18

Too far for me too. Sorry drew for not being there. ...

Like Reply 5d

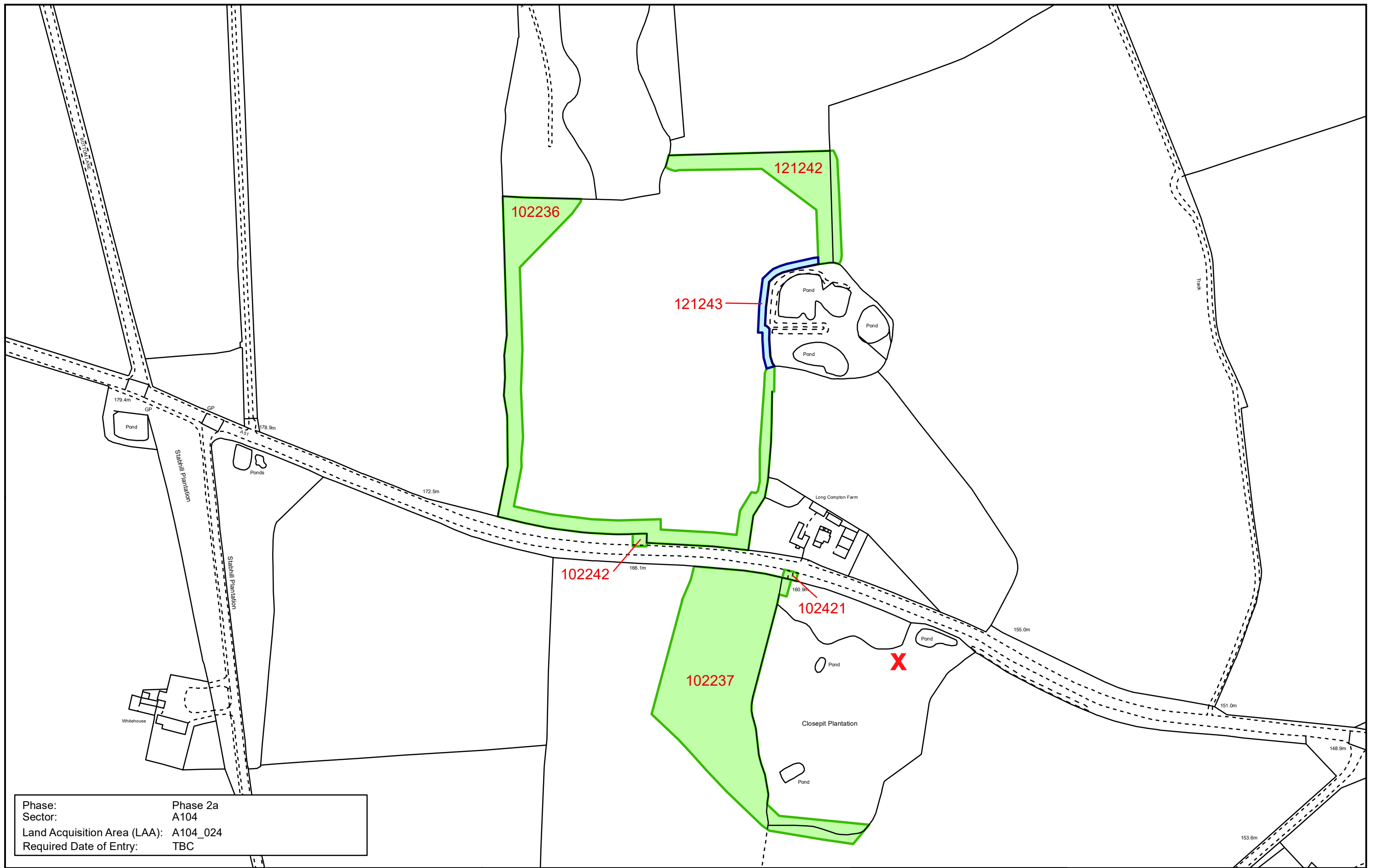


Drew Robson was live.
March 25 at 11:21 AM · 🌐



Numbers would be amazing!





Phase: Phase 2a
 Sector: A104
 Land Acquisition Area (LAA): A104_024
 Required Date of Entry: TBC

	Permanent Acquisition: land required permanently for the railway		Acquisition of new rights - taking rights (in, under, or over land). For example an easement, restrictive covenant (S.7) or rights of access (S.8).
	Temporary possession - exclusive: land to be occupied temporarily. This land is to be used exclusively by HS2 or its' contractors		Acquisition of Subsoil strata only (greater than nine metres below surface)
	Temporary possession - in common: land to be occupied temporarily. This land is to be used exclusively by HS2 in common with others		Possession/Acquisition by Agreement e.g. where HS2 is prevented from use of CPO powers (NR, Crown land) or U&As preventing the exercise of powers.

Rev	Date	Description	By	Ckd	App
C08	08/12/21	A104_024 LAP Plan	OH	AA	BL
C07	19/11/21	A104_024 LAP Plan	SM	AS	VO
C06	11/10/21	A104_024 LAP Plan	AS	AA	BL
C05	06/09/21	A104_024 LAP Plan	AW	AA	BL
C04	12/08/21	A104_024 LAP Plan	SM	EC	RB
C03	26/04/21	A104_024 LAP Plan	AW	AA	BL

Map Name
Land Acquisition Parcel (LAP) Plan
 LAA Number:
A104_024

Registered office: Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.
 Company registration number: 06791686.
 VAT registration number: 181 43 12 30.

HS2 Ltd accept no responsibility for any circumstances, which arise from the reproduction of this map after alteration, amendment or abbreviation or if it is issued in part or issued incomplete in any way.

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Scale at A3: 1:2,500

 0 20 40 60 80 Metres

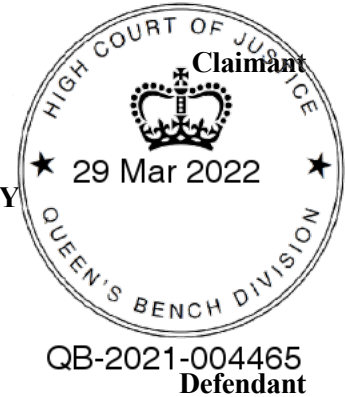
Doc Number: C863-MCL-LP-PLN-A000-194024
Date: 08/12/21

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
THE HONOURABLE MR JUSTICE LINDEN
B E T W E E N:

(1) HIGH SPEED TWO (HS2) LIMITED

and

- (1) LARCH IAN ALBERT FRANK MAXEY
- (2) DANIEL HOOPER
- (3) ISLA SANDFORD
- (4) JULIETTE STEPHENSON-CLARKE
- (5) BETHANY CROARKIN



FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

If you the within named Defendants 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 Defendants 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 DEFENDANTS

This order prohibits you from doing the acts set out in paragraph 6 below. You should read it very carefully.

UPON the Claimant's application of 24 March 2022 for approval of a consent order; and

UPON the Court hearing Michael Fry and Jonathan Welch of Counsel for the Claimant, and Tim James-Matthews of Counsel for the First, Second, Third, Fourth and Fifth Defendants (together the "Defendants")

UPON each of the **Defendants** admitting that their actions in (a) engaging in underground tunnelling activity at the Claimant's land at Euston Square Gardens in London; (b) failing to provide information concerning the said tunnels to the Claimant and the emergency services; and (c) failing to co-operate with the Claimant and the emergency services to leave the said tunnels constituted contempt of court by breaching of the orders of Mrs Justice Steyn dated 10 February 2021 (in the case of the First Defendant) and Mr Justice Mann dated 22 February 2021 (in the cases of the Second, Third, Fourth and Fifth Defendants); and

UPON the **Defendants** purging such contempt by apologising to the Court for the acts constituting contempt of court; and

UPON the **Defendants** giving undertakings to the Court as set out below; and

UPON the undertaking to the Court given by the **First Defendant** in similar terms to those set out below on 8 November 2021 (recorded in the order of Mr Justice Marcus Smith dated 10 November 2021) in action number PT-2020-BHM-000017 being discharged in accordance with paragraph 4 below.

IT IS ORDERED THAT:

1. The Claimant's application, dated 7 December 2021, for committal of the Defendants is dismissed.
2. There be no order for costs.
3. Service of this Order may be effected, as an alternative, by electronic means by email to Mr. Simon Natas of ITN Solicitors (the **Defendants'** solicitors) at snatas@itnsolicitors.com and such service shall be deemed to be good and sufficient service on each of the **Defendants**.
4. The order of Mr Justice Marcus Smith dated 10 November 2021 in action number PT-2020-BHM-000017 in respect of the **First Defendant** is discharged.
5. The oral judgment of Linden J which was given at the end of the hearing on 28 March 2022 will be transcribed within 21 days of this Order at the **Claimant's** expense and copies of the judgment, when it has been approved, will be sent to the **Defendant's** solicitors in the email address at paragraph 3 above within 7 days of it being promulgated.

UNDERTAKINGS TO THE COURT

In this Order the "**HS2 Scheme**" means any and all works for all phases of the High Speed Rail Project commonly referred to as HS2 (whether or not currently authorised by Parliament). The "**HS2 Scheme Land**" means all of the land which is acquired or held by the Claimant or the Secretary of State for Transport in connection with the HS2 Scheme.

On the 28th day of March 2022 the **Defendants** gave undertakings to the Court promising as follows:

6. not to engage in any of the following conduct, in each case where that conduct has the effect of

damaging and/or delaying and/or hindering the Claimant by obstructing, impeding or interfering with the lawful activities undertaken by them or by contractors, sub-contractors, suppliers or service providers engaged by the Claimant, in connection with the HS2 Scheme:

- a. enter, be present or remain on any HS2 Scheme Land, site, building or office;
- b. interfere with the workings of any HS2 Scheme Land, site, building or office;
- c. go within 100 metres of any HS2 Scheme Land, site, building or office;
- d. obstruct, by whatever means, whether with or without others, access to or egress from any HS2 Scheme Land, site, building or office;
- e. cause damage to property belonging to the Claimant, group companies of the Claimant, or contractors, sub-contractors, suppliers or service providers engaged by the Claimant, in connection with the HS2 Scheme;
- f. obstruct free passage along a public highway, or the access to or from a public highway, by:
 - i. blocking the highway or access thereto with persons or things when done with a view to slowing down or stopping vehicular or pedestrian traffic, and with the effect of causing inconvenience and/or delay; and/or
 - ii. walking in front of vehicles with the object of slowing them down, and with the effect of causing inconvenience and/or delay; or
- g. climb onto or attach themselves to vehicles or plant or machinery used by the Claimant.

AND TO BE BOUND BY THESE PROMISES UNTIL 31 DECEMBER 2024.

**Dated 28 March 2022
Mr Justice Linden**

BY THE COURT

IN THE HIGH COURT OF JUSTICE.
QUEENS BENCH DIVISION

CLAIM No: QB-2022-000904

Before: Mr. Justice Butcher

On: 21 March 2022

BETWEEN

**VALERO ENERGY LIMITED
VALERO LOGISTICS UK LIMITED
VALERO PEMBROKESHIRE OIL TERMINAL LIMITED**



QB-2022-000904
Sub Event ID: 3

-and-

**(1) PERSONS UNKNOWN ENTERING OR THREATENING TO ENTER AND
REMAIN WITHOUT THE CONSENT OF THE CLAIMANT(S) ON THE LAND
KNOWN INFORMALLY AS PEMBROKE REFINERY, MANCHESTER
TERMINAL, KINGSBURY TERMINAL, PLYMOUTH TERMINAL, CARDIFF
TERMINAL, PEMBROKESHIRE TERMINAL AND AVONMOUTH
TERMINAL AND MORE PARTICULARLY DESCRIBED BELOW AS THE
CLAIMANTS' LAND**

**(2) PERSONS UNKNOWN CAUSING OR THREATENING TO CAUSE
BLOCKADES, OBSTRUCTIONS AND/OR PREVENT THE FREE FLOW OF
TRAFFIC AND INTERFERE WITH THE PASSAGE BY THE CLAIMANTS
AND THEIR AGENTS, SERVANTS, EMPLOYEES, LICENSEES, INVITEES
WITH OR WITHOUT VEHICLES AND EQUIPMENT TO, FROM , OVER AND
ACROSS THE ROADS IN THE VICINITY OF THE LAND INFORMALLY AS
PEMBROKE REFINERY, MANCHESTER TERMINAL, KINGSBURY
TERMINAL, PLYMOUTH TERMINAL, CARDIFF TERMINAL,
PEMBROKESHIRE TERMINAL AND AVONMOUTH TERMINAL IN**

**CONNECTION WITH ENVIRONMENTAL PROTESTS BY THE JUST STOP
OIL AND/OR EXTINCTION REBELLION AND/OR INSULATE BRITAIN
AND/OR YOUTH SWARM MOVEMENTS**

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS
ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER
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 DEFENDANTS TO BREACH THE TERMS OF
THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE
IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED**

IMPORTANT NOTICE TO THE DEFENDANTS

**This Order prohibits you from doing the acts set out in this Order. You should read it
very carefully. You are advised to consult a solicitor as soon as possible. You have the
right to ask the Court to vary or discharge this Order.**

UPON the Claimants' Application by Application Notice for a quia timet injunction dated 21
March 2022 (the "Application")

AND UPON READING the Application and the witness statements of Adrian Rafferty, David Blackhouse and David McLoughlin dated 18 March 2022.

AND UPON hearing Myriam Stacey QC and Joel Semakula for the Claimants

AND UPON the Claimants undertaking to file the claim and application and the note of this hearing and pay the relevant court fees by the end of the next working day after the sealing of this Order

AND UPON the Claimants indicating that they will provide to any defendant copies of further evidence or other documents filed in these proceedings upon request from time-to-time at an email address provided to the Claimants and place all such documents online to be publicly accessible

AND UPON the Court accepting the Claimants' undertaking that the Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a defendant and the Court finds that the defendant ought to be compensated for that loss

AND UPON the Claimants undertaking to identify and name defendants and apply to add them as named defendants to this Order as soon as reasonably practicable

AND UPON the Claimants confirming that this Order is not intended to prohibit lawful protest around the Claimants' Land which does not endanger, slow, obstruct, or prevent the free flow of traffic onto or along the Access Roads defined in paragraph 1.2 of the Order nor to prevent lawful use of the Access Roads by any person

IT IS ORDERED THAT:

1. For the purposes of this Order,

1.1 the "Claimants' Land" means all of the property referred to and defined in paragraph 2.1 hereof;

1.2 the “Access Roads” means those parts of the roads in the vicinity of the Claimants’ Land which provide access to each of the sites forming the subject of the Claimants’ Land and the location and extent of which are more particularly shown for illustration purposes coloured variously red, yellow and blue on the plans annexed hereto at Annex I to this Order.

Injunction in force

2. With immediate effect until trial, or further Order in the meantime the Defendants and each of them are forbidden from:

2.1 Entering or remaining upon any part of the following property:

- a) that part of the First Claimant’s freehold property informally known as ‘Pembroke Refinery’ situated at Angle, Pembroke SA71 5SJ, title to which is registered at HM Land Registry under title number CYM613413, the extent of which is shown outlined on the overlay plans exhibited hereto in Annex A (“**Pembroke Oil Refinery**”);
- b) the First Claimant’s leasehold property informally known as ‘Tanker berthing jetties at Pembroke Refinery’ situated at Angle, Pembroke SA71 5SJ, title to which is registered at HM Land Registry under title number CYM614801, the extent of which is shown outlined on the overlay plans exhibited hereto in Annex B (“**Pembroke Oil Refinery Jetties**”);
- c) the Second Claimant’s freehold property informally known as ‘Manchester Terminal’ situated at Trafford Wharf Road, Trafford, title to which is registered at HM Land Registry under title numbers GM12948, GM681405, GM681406, GM783767, LA296722, LA331236 and LA182975 and the

extent of which is shown outlined on the overlay plans exhibited hereto in Annex C (the “**Manchester Oil Terminal**”);

- d) the Second Claimant’s freehold land informally known as ‘Kingsbury Terminal’ at Plot B Trinity Road, Kingsbury, Tamworth, title to which is registered at HM Land Registry under title number WK471878 and the extent of which is which is shown outlined on the overlay plans exhibited hereto in in Annex D (the “**Kingsbury Oil Terminal**”);
- e) the Second Claimant’s leasehold land informally known ‘Plymouth Terminal’ at Cattedown Road, Cattedown, Plymouth title to which is registered at HM Land Registry under title number DN313194 the extent of which is shown outlined on the overlay plans exhibited hereto in Annex E (the “**Plymouth Oil Terminal**”);
- f) the Second Claimant’s leasehold land informally known as ‘Cardiff Terminal’ at Valero Refinery, Roath Dock, Rover Way, Cardiff CF10 4US, title to which is registered at HM Land Registry under title number CYM801292 and the extent of which is shown outlined on the overlay plans exhibited hereto in Annex F (the “**Cardiff Oil Terminal**”);
- g) the Second Claimant’s leasehold land informally known as ‘Avonmouth Terminal’, Avonmouth Dock, Bristol title to which is registered at HM Land Registry under title number BL116644 the extent of which is shown outlined on the overlay plans exhibited hereto in Annex G (the “**Avonmouth Oil Terminal**”); and
- h) the Third Claimant’s leasehold land informally known as ‘Valero Pembroke Oil Terminal’, Waterston, Milford Haven title to which is registered at HM Land Registry under title number CYM287387 the extent of which is shown

outlined on the overlay plans exhibited hereto in Annex H (the “**Pembrokeshire Terminal**”);

- 2.2 Blocking any entrance to the Claimants’ Land and/or otherwise impeding access to or enjoyment of the Claimants’ Land;
- 2.3 Damaging any part of the Claimants’ Land;
- 2.4 Blocking, endangering, slowing down, preventing, or obstructing the free passage of traffic onto or along those parts of the Access Roads between the points marked on the plans at Annex I which provide access to the Claimants’ Land;
- 2.5 Affixing themselves to any other person or object on the Claimants’ Land or the aforesaid parts of the Access Roads;
- 2.6 Erecting any structure on the Claimants’ Land or on the aforesaid parts of the Access Roads;
- 2.7 Abandoning any vehicle or item on the aforesaid parts of the Access Roads or doing any other act thereon which might impede access or cause an obstruction;
- 2.8 Refusing to leave the aforesaid parts of the Access Roads when asked to do so by a police constable, when causing an obstruction pursuant to paragraphs 2.2 and 2.4 – 2.7;
- 2.9 Causing, assisting or encouraging any other person to do any act prohibited by 2.1 to 2.8 above;
- 2.10 Continuing any act prohibited by paragraphs 2.1 to 2.9 above

Service

3. Pursuant to CPR r.6.15, r.6.27 and r. 81.4(c) and (d), the steps taken by the Claimants to serve the Claim Form, the application for an interim injunction dated 18 March 2022 (the “Application”), the witness statements of Adrian Rafferty, David Blackhouse and David McLoughlin dated 18 March 2022 with their exhibits and any Order made and the notice of the hearing of the Injunction Application (together “the Claim Documents”) on the Defendants shall be dealt with as follows:

3.1 The Claimants shall affix sealed copies of the Claim Documents in transparent envelopes in at least two location within Pembroke Refinery, Manchester Terminal, Kingsbury Terminal, Plymouth Terminal, Cardiff Terminal, Pembrokeshire Terminal and Avonmouth Terminal.

3.2 The Claimants shall position (four) 4 signs, at conspicuous locations along each of Angle Road; the emergency services access road at Pembroke Refinery; Churchill Way; Trafford Wharf Road; Trinity Road; Piccadilly Way; the privately owned road at the Kingsbury Terminal; Oakfield Terrace Road; Rover Way; Holesmouth Road; King Road Avenue; and 5th Street which are approximately 1.5m x 1m in size, advertising the existence of this Order (together with a map of the relevant site of at least A2 size).

3.3 The Claimants shall upload electronic copies of the Claim Documents (in PDF form) to an electronic folder on the “Dropbox” website and shall include the link to the Dropbox folder and the Claimants’ solicitors’ contact details on each of the aforesaid signs.

3.4 The Claimants shall email a copy of the Order to the email addresses set out in the Appendix hereto.

4. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order on the First and Second Defendants and each of them.

5. The Court will provide sealed copies of this Order to the Claimants’ solicitors for service (whose details are set out below).

Further directions

6. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants' solicitors immediately by emailing valero.service@shoosmiths.co.uk.
7. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
8. The Claimants have liberty to apply to extend or vary this Order or for further directions.
9. The return date hearing is fixed for 11 April 2022 at 10:30AM.
10. No acknowledgment of service, admission or defence is required by any party in advance of the return date of the Injunction Application.
11. Costs reserved.

Communications with the Claimants

12. The Claimants' solicitors and their contact details are:

Shoosmiths LLP
2 Colmore Square
38 Colmore Circus Queensway
Birmingham
B4 6SH
(Ref: M-996090)
E: valero.service@shoosmiths.co.uk
T: 03700863000

Dated: 21 March 2022

INDEX TO EXHIBIT JAD5

All videos are at: <https://vimeo.com/showcase/exhibit-jad5>

Video Number	Date	Description	Source URL
Video 1	24.03.2022	ITV News	https://www.facebook.com/HS2rebellion/videos/295896602619345/
Video 2	25.03.2022	Taken by D17 at 09:46 – interference with fencing	https://www.facebook.com/100035849292228/videos/976210543256184/
Video 3	25.03.2022	Taken by D6 at 09:51 – interference with fencing	https://www.facebook.com/102443345283393/videos/693760762076398
Video 4	25.03.2022	Taken by D6 at 11:18 – interference with fencing	https://www.facebook.com/102443345283393/videos/2889424431357203/
Video 5	25.03.2022	Taken by D17 at 11:27 – trespass and abuse of security personnel	https://www.facebook.com/100035849292228/videos/369599771747503/