

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

BETWEEN:

**(3) HIGH SPEED TWO (HS2) LIMITED
(4) THE SECRETARY OF STATE FOR TRANSPORT**

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

BUNDLE C
(Volume B)
for hearing on 26 and 27 May 2022

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

**Telephone: 0114 283 3312
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Reference: RXS/380900/378

Solicitors for the Claimants

On behalf of: Claimants
J.A.Dilcock
1st statement of witness
Exhibits: JAD1 to JAD3
Date: 25 March 2022

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

Claim No.

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & ORS

Defendants

**EXHIBIT JAD1 TO THE WITNESS STATEMENT OF JULIE AMBER
DILCOCK**

Please refer to Bundle F for this Exhibit.

On behalf of: Claimants
J.A.Dilcock
1st statement of witness
Exhibits: JAD1 to JAD3
Date: 25 March 2022

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

Claim No.

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & ORS

Defendants

**EXHIBIT JAD2 TO THE WITNESS STATEMENT OF JULIE AMBER
DILCOCK**

Please refer to Tabs 1 - 4 in Bundle E for this Exhibit.

On behalf of: Claimants
J.A.Dilcock
1st statement of witness
Exhibits: JAD1 to JAD3
Date: 25 March 2022

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

Claim No.

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & ORS

Defendants

**EXHIBIT JAD3 TO THE WITNESS STATEMENT OF JULIE AMBER
DILCOCK**

HS2 slaps eviction notice on activists in this makeshift Staffordshire camp

HS2 has ordered them to leave the Bluebell Woods Swynnerton camp by tomorrow

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COMMENTS

By [Richard Price](#) Local Democracy Reporter
05:00, 23 MAR 2022

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HS2 protesters living in a makeshift camp have been slapped with an eviction notice. The activists have been living in the woodland at Cash's Pit, in Swynnerton, for almost a year.

It is nicknamed Bluebell Woods Protection Camp, has around 40 residents, and sits on the route of the western leg of the high-speed rail scheme. But HS2 wants them out - and has given them until Thursday, March 24 to leave.

One of the activists said: "They want rid of us basically. But I think plenty of people will stick around and resist the eviction, definitely. This is our home as well as woods that we need to protect. Some people have nowhere else to go but on principle we shouldn't be forced to leave really so people will stay and resist it."

"We're trying to stop the woods being cut down. It's on quite 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 train line, which is a lot of people. It's a place for people to come and find out what's to come for them in the area."

The camp includes a makeshift visitors' centre, with pictures of protesters and information boards. It also has a postbox, and signs up listing items the camp-mates need - such as firewood, wood chip, and various building materials.



The activists are already preparing themselves to fight the eviction.

One of them said: "A lot of the defences are finished or made up to more of a usable standard. At the moment we are working on a treehouse at the front, just making it ready so that there can be people in it. And we've got other treehouses here which are all defences.

"I'm planning on being here. They'll have to pull us out basically - we'll be attached to things, under things, on top of things, in holes in the ground. Most HS2 camps will have tunnels, and all of them have trees as well, and that's how we'll be resisting."



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."

HS2 has issued a statement ahead of this week's planned eviction.

A HS2 spokesman said: "HS2 will provide zero-carbon rail travel from day one, helping the UK fight climate change. To ensure we enhance biodiversity along the line of HS2, we've already started planting seven million trees and shrubs between Birmingham and London. Along the railway's route to Crewe, which includes Bluebell Wood, we will create new wildlife habitats, including planting 600,000 square metres of woodland.

"We urge protesters at the illegal Bluebell Wood encampment to leave the site before HS2 Ltd takes temporary possession on March 24."



Claim No: PT-2018-000098

**IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS
PROPERTY, TRUSTS AND PROBATE LIST (ChD)**

Before: David Holland QC (sitting as a Deputy Judge of the High Court)
On: 24, 25 and 27 August

2020

B E T W E E N:

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

Claimants/Applicants

-and-

- (1)PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE
CONSENT OF THE CLAIMANT(S) ON LAND AT HARVIL ROAD, HAREFIELD IN
THE LONDON BOROUGH OF HILLINGDON SHOWN COLOURED GREEN,
BLUE AND PINK AND
EDGED IN RED ON THE PLAN ANNEXED TO THIS ORDER

- (2)PERSONS UNKNOWN SUBSTANTIALLY INTERFERING WITH THE PASSAGE
BY THE CLAIMANTS AND THEIR AGENTS, SERVANTS, CONTRACTORS,
SUB-
CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES OR EMPLOYEES
WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT TO AND FROM
THE LAND AT HARVIL ROAD SHOWN COLOURED GREEN, BLUE AND PINK AND
EDGED IN RED ON THE PLAN ANNEXED TO THIS ORDER

- (3)to (35) THE NAMED DEFENDANTS LISTED IN THE SCHEDULE HERETO

- (36) 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 HARVIL ROAD SITE (AS DEFINED IN THIS ORDER), OR DAMAGING, APPLYING
ANY SUBSTANCE TO OR INTEFERING WITH ANY LOCK OR ANY GATE AT THE
PERIMETER OF THE HARVIL
ROAD SITE WITHOUT THE CONSENT OF THE CLAIMANTS

Defendants/Respondents

ORDER

***RESTRAINING TRESPASS ON AND OBSTRUCTION OF ACCESS TO AND
FROM THE LAND KNOWN AS THE HARVIL ROAD SITE DEFINED HEREIN***

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY

**THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND
MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED**

IMPORTANT NOTICE TO THE DEFENDANTS

- (1) This Order (and paragraphs 2 to 5 in particular) 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.**
- (2) Electronic copies of the applications and evidence filed in these proceedings are available at:**
 - (i) <https://hs2inhillington.commonplace.is/>**
 - (ii) <https://www.gov.uk/government/organisations/high-speed-two-limited>.**
- (3) Any person who is unable to obtain electronic copies of documents at that address, or who wishes to obtain hard copies of documents, should contact the Claimants' solicitors (Eversheds Sutherland (International) LLP) using the contact details at the end of this Order.**
- (4) Further case-management hearings are due to take place in these proceedings and further directions orders will be made for the future case-management of these proceedings. Notices of such hearings and copies of those orders will be made available at the websites listed at paragraph (2) above. Any Named Defendant or other person who wishes to become a Named Defendant or is otherwise interested in these proceedings should therefore monitor those websites.**

UPON the Claimants' application by Application Notice dated 15 June 2020 ("the **Substantive Amendment Application**").

AND UPON "the **Harvil Road Site**" being defined, for the purposes of this Order, as the land shown coloured green, blue and pink and edged in red on the plan annexed to this Order as "**Plan A**".

AND FURTHER TO the extension and variation of the order of Mr David Holland QC (sitting as a deputy judge of the High Court) on 22 June 2020 (the "**Current Injunction**").

AND UPON the Court having read: (i) the first witness statement of Shona Ruth Jenkins dated 18 May 2020; (ii) the second witness statement of Rohan Perinpanayagam dated 15 June 2020; (iii) the second witness statement of Richard Joseph Jordan dated 15 June 2020; (iv) the third witness statement of Rohan Perinpanayagam dated 27 July 2020; (v) the third witness statement of Richard Joseph Jordan dated 27 July 2020; (vi) the fourth witness statement of Rohan Perinpanayagam dated 13 August 2020; (vii) the three statements filed in these proceedings by the former D3; (viii) the undated statement from D4; (ix) the email to the Court dated 2 June 2020 from D8; (x) the email to the Court dated 2 June 2020 from D9; (xi) the email to the Court dated 24 August 2020 from D18; (xii) the email to the Court dated 21 August 2020 from D22; (xiii) the email to the Court dated 21 August 2020 from D25; (xiv) the two undated written documents from D27; (xx) the undated statement of D28; and (xxi) the undated written statement of D32.

AND UPON the hearing having taken place in public but remotely via Skype for Business due to the Covid-19 pandemic.

AND UPON hearing: (i) Tom Roscoe and Daniel Scott, counsel for the Claimants; (ii) Sailesh Mehta, counsel for the (former) 3rd Defendant in order to approve the 3rd Defendant's removal from these proceedings upon the terms of a consent order which included the offering of an undertaking to the Court; Paul Powlesland, counsel for the 4th Defendant; and (iv) the 8th to 10th Defendants, the 13th Defendant, the 18th Defendant, the 22nd to 23rd Defendant, the 25th to 28th Defendants and the 31st to 32nd Defendants, all appearing and addressing the Court in person

AND UPON the Court accepting the Claimants' renewed 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 confirming that this Order is not intended to prohibit continued occupation of the "Protestor Encampment" on Harvil Road, marked on Plan A.

AND UPON the Court confirming that its written judgment following the hearing on 24, 25 and 27 August 2020 shall be deemed to have been handed down formally on 4 September 2020.

AND UPON the Court giving further written directions consequential upon that judgment by email to the Claimants' counsel dated 15 September 2020, which directions are reflected in this order.

IT IS ORDERED THAT:

Parties

1. The names of First, Second and 36th Defendants shall henceforth be as in the header of this Order.

Injunction over the Harvil Road Site

2. With immediate effect the First Defendant, the Named Defendants and each of them are forbidden, without the consent of the First or Second Claimant, from entering or remaining upon "the **Harvil Road Site**", being the land shaded green, blue and pink and outlined red on Plan A. Further:

2.1 This paragraph of this Order shall, for the avoidance of doubt, apply to the splays, or bell-mouth areas, for access and egress at the following vehicular entrances to the Harvil Road Site (all together, "the **Vehicular Entrances**").

(i) between the Harvil Road Site and the public highway known as the Harvil Road, Harefield in the London Borough of Hillingdon ("**Harvil Road**") at the vehicular entrances marked on Plan A as "Gate 1", "Gate 2", "West Gate 3 Entrance", "Fusion Dews Lane Compound HQ" and "Gate 4" ("the **Harvil Road Entrances**"); and

(ii) between the Harvil Road Site and the adjoining land in the vicinity of the Hillingdon Outdoor Activity Centre ("the **HOAC**") marked on Plan A at "Dews Lane West" ("the **Dews Lane West Entrance**").

2.2 For the purposes of this Order the areas of concrete hard standing immediately adjacent to the main carriageway of the public highway at each of the Harvil Road Entrances shall **NOT** be treated as part of the Harvil Road Site, but the areas of the bell-mouths between that

concrete hard standing and the gates at the Harvil Road Entrances **SHALL** be treated as part of the Harvil Road Site and covered by this paragraph of the Order.

- 2.3 The Claimants shall seek, so far as reasonably practicable, to demark that boundary by some physical line or mark or other feature on the ground.
3. With immediate effect, the 36th Defendant, the Named Defendants and each of them shall not: (i) cut, damage, move, climb on or over, dig beneath or remove any item affixed to any temporary or permanent fencing or gates on or at the perimeter of the Harvil Road Site; or (ii) damage, apply any substance to or interfere with any lock on any gate at the perimeter of the Harvil Road Site without the consent of the Claimants.
4. With immediate effect, the Second Defendant, the Named Defendants and each of them are forbidden from substantially interfering with the Claimants' and/or their agents', servants', contractors', sub-contractors', group companies', licensees', invitees' or employees' access to (or egress from) the Harvil Road Site (or any part of it):
 - 4.1 from (or to) the Harvil Road or other public highway; and/or
 - 4.2 from (or to) adjacent land in the vicinity of the HOAC via the Dews Lane West Entrance.
5. For the purposes of paragraph 4, acts of substantial interference shall include (but not necessarily be limited to):
 - 5.1 climbing onto or underneath vehicles;
 - 5.2 attaching persons or objects to vehicles;
 - 5.3 standing, sitting or lying in front of vehicles;
 - 5.4 attaching persons to other persons or objects so as to create an obstruction of the public highway or the splay or bell-mouth areas at the Vehicular Entrances; and
 - 5.5 attaching persons or objects to the gates at the Vehicular Entrances.

6. The injunctions at paragraphs 2 to 5 above shall remain in effect until trial or further order or, if earlier, a long-stop date of 4 September 2022.

Further directions

Variation or discharge

7. 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 (and in any event not less than 48 hours before the hearing of any such application).
8. 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.
9. The Claimants have liberty to apply to extend or vary this Order or for further directions.

Future case management

10. Any Named Defendant who intends to defend the Claimants' claims as set out in the Re-Amended Claim Form, as amended pursuant to the Order of David Holland QC (and a copy of which is available on the websites specified at paragraph 15.4 below) must by 4pm on 2 October 2020 file with the Court and serve on the Claimants' solicitors (whose details are set out below) an Acknowledgement of Service pursuant to CPR r.8.3. The said Acknowledgment of Service must include a postal and/or email address for service.
11. Any Named Defendant who does not comply with paragraph 10 shall be debarred from defending the Claim or appearing at any future hearing without further leave of the Court.
12. A Case Management Conference ("**CMC**") is to be listed before a High Court Judge with a time estimate of 1 day on the first available date after 30 October 2020. The CMC is listed to consider the directions required for the further conduct of these proceedings and is not convened to reconsider the grant of interim injunctive relief.

13. The Claimants must serve a list of draft directions which they intend to seek at the CMC on each Named Defendant who has filed and served an Acknowledgment of Service at least 14 days before the CMC.
14. Each such Named Defendant must counter-serve a list of draft directions which they intend to seek at the CMC on the Claimants' solicitors at least 7 days before the CMC.

Service on First, Second and 36th Defendants

15. Pursuant to CPR r. 6.27 and r. 81.8 service of this Order on the First, Second and 36th Defendants shall be dealt with as follows:

15.1 The Claimants shall affix sealed copies of this Order in transparent envelopes to posts, gates, fences and hedges at conspicuous locations around the Harvil Road Site, including at and opposite the Vehicular Entrances.

15.2 The Claimants shall position in the same locations signs, no smaller than A3 in size, advertising the existence of this Order and providing the Claimant's solicitors contact details in case of requests for a copy of the order or further information in relation to it.

15.3 The Claimants shall also leave sealed copies of this Order at the Protestor Encampment marked on Plan A.

15.4 The Claimants shall further advertise the existence of this order in a prominent location on the websites:

(i) <https://hs2inhillington.commonplace.is/>; and

(ii) <https://www.gov.uk/government/organisations/high-speed-two-limited>,

together with a link to download an electronic copy of this Order.

16. The taking of such steps shall amount to due service of this Order on the First, Second and 36th Defendants and each of them.
17. This Order shall be deemed served on those Defendants the date that the last of the above steps is taken, and shall be verified by a certificate of

service.

18. The Claimants shall from-time-to-time (and no less frequently than every 28 days) confirm that copies of the orders and signs referred to at paragraphs 7.1 and 7.2 above remain in place and legible, and, if not, shall replace them as soon as reasonably practical.

Service on the Named Defendants

19. The Claimants must use reasonable endeavours forthwith to serve the Named Defendants with this Order. Pursuant to CPR r.6.27 and r.81.8, service on the Named Defendants of this Order and any future documents in these proceedings may be effected: (i) by leaving hard copies addressed to them at the address or other physical location they indicated for that purpose; and/or (ii) by emailing electronic copies to the email addresses provided for those purposes. Such service shall be deemed effective on the date the relevant step is taken and shall be verified by a Certificate of Service.
20. The Claimants have liberty to apply for orders for alternative service of this Order or any other documents in these proceedings upon the other Named Defendants under CPR r.6.27 and/or r.81.8.

Costs

21. The Claimants shall forthwith serve on any Named Defendant against whom they seek an order for costs copies of schedules of their costs together with, in written form, a description of the order for costs which is sought against that Named Defendant.
22. Service of such schedules and written description of the order sought shall be carried out in accordance with the same methods of service for this Order as set out in paragraphs 19 and 20 above and shall be verified by certificates of service.
23. Each Named Defendant so served has permission to file with the Court and serve on the Claimants (using the Claimants' solicitors contact details set out below) written submissions setting out why they say they should not be ordered to pay the costs as sought and, if they are ordered to pay costs, what amount they should pay. Such written submissions to be filed and served on

or before 4.00pm on 6 October 2020.

24. The Claimants have permission to file and serve a written response to those submissions by 4pm on 13 October 2020.
25. The Court will determine the matter of costs (that is whether any or all of the Defendants should pay costs and, if so, in what amount) in writing and without a further hearing, such decision to be made on or after 14th October 2020 and communicated in writing.

AND UPON the Claimants' Application for Permission to Appeal

26. The Claimants are granted permission to appeal the decision that the Court is required, in light of the decision in Canada Goose v Persons Unknown [2020] EWCA Civ 303, to provide case management directions for the trial or other final determination of these proceedings, irrespective of whether any Defendant files an Acknowledgement of Service.
27. The said permission to appeal is granted subject to the condition (imposed pursuant to CPR Part 52.6(2)(b)) that, whatever the outcome of the appeal, the Claimants should not recover any of the costs of or occasioned by any appeal against any named party (whether Defendant or Respondent). This condition is not intended to prevent any named Respondent from participating in the appeal should they see fit.
28. Pursuant to CPR r.52.12, the deadline for the Claimants to file an Appellant's Notice is extended to 4pm on 16 October 2020.

Communications with the Court & Claimants' Solicitors

29. All communications to the Court about this Order (which should quote the case number) should be sent to:

Court Manager
High Court of
Justice Chancery
Division Rolls
Building
7 Rolls
Building
Fetter Lane
London

EC4A 1NL

The telephone number is 020 7947 7501. The officer are open weekdays 10.00am to 4.30pm.

The out of hours telephone number (for urgent business only) is 020 7947 6260.

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

Eversheds Sutherland (International) LLP of:

1 Callaghan
Square Cardiff
CF10 5BT

DX: 33016 Cardiff
Tel: 020 7497 9797

Email: ShonaJenkins@eversheds-
sutherland.com

Ref: JENKINSW/335547/000169

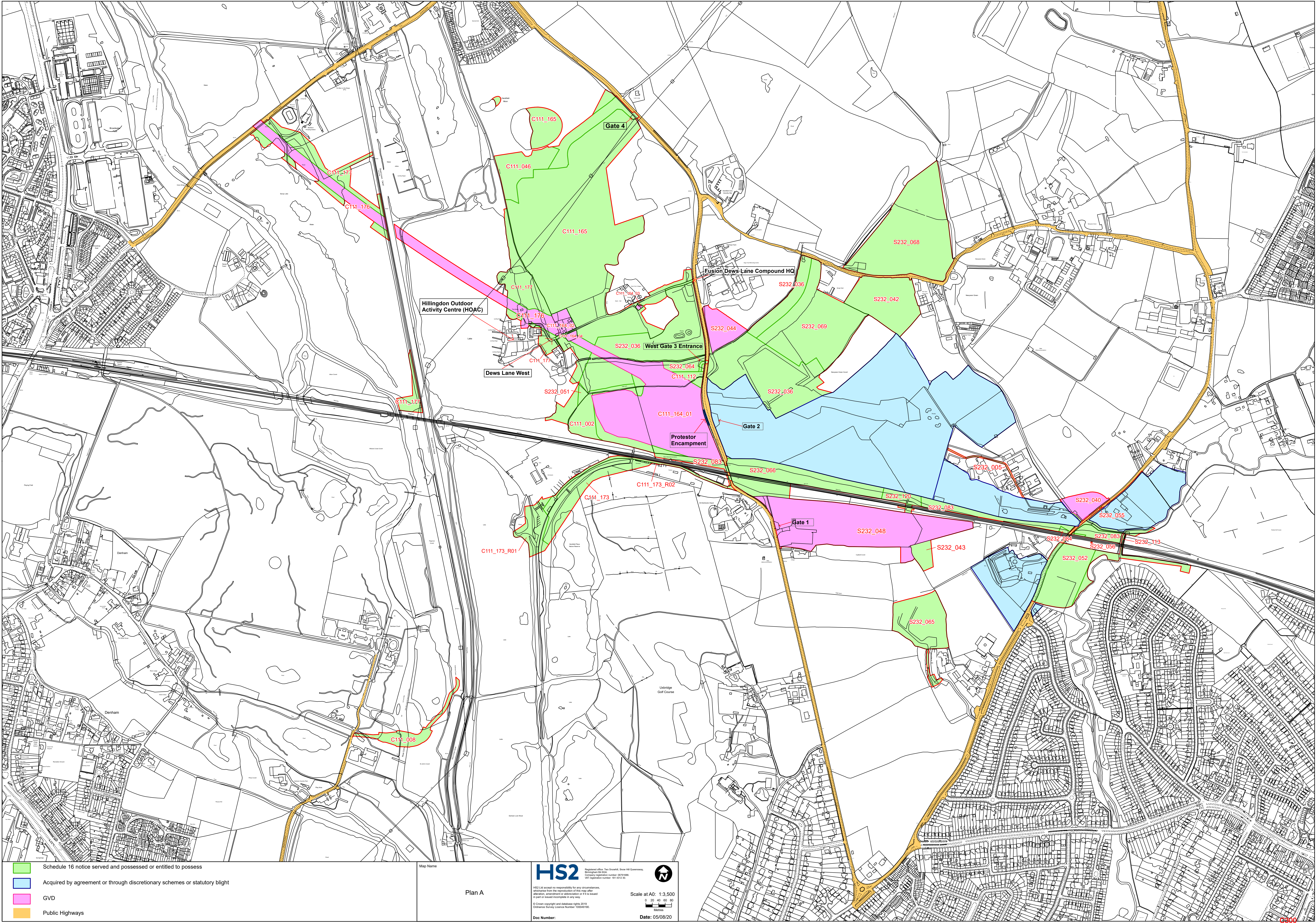
Service

The Court has provided a sealed copy of this Order to the Claimants' solicitors at the above address for service.

Dated:

SCHEDULE OF NAMED DEFENDANTS

3. *[No longer used]*
4. Mark Keir
5. *[No longer used]*
6. *[No longer used]*
7. Thorn Ramsey
8. Vajda Robert Mordechaj
9. Iain Oliver
10. Elliott Cuciurean
11. Jess Walker
12. Matt Atkinson
13. Scott Breen
14. Hannah Bennett
15. James aka "Jimmy" Ruggles
16. Nick Grant aka "Potts"
17. Stuart Ackroyd
18. Wiktor Zieniuk
19. Paul Sandison
20. Tom Dalton
21. Conner Nichols
22. Dr Ian "Larch" Maxey
23. Sebastian Roblyn Maxey
24. Jessica Heathland-Smith
25. Ella Dorton
26. Karl Collins
27. Sam Goggin
28. Hayley Pitwell
29. Jacob Harwood
30. Tom Holmes
31. Libby Farbrother
32. Samantha Smithson
33. *[No longer used]*
34. Jack Charles Oliver
35. Charlie Inskip



**IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS
PROPERTY, TRUSTS AND PROBATE LIST
BIRMINGHAM DISTRICT REGISTRY**

**Before: Mr Justice Marcus Smith
On: 13 April 2021**

Claim No: PT-2020-BHM-000017



PT-2020-BHM-000017

B E T W E E N:

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

Claimants / Applicants

-and-

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON LAND AT SOUTH CUBBINGTON WOOD, SOUTH OF RUGBY ROAD, CUBBINGTON, LEAMINGTON SPA SHOWN COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON PLAN A ANNEXED TO THE PARTICULARS OF CLAIM

(2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON LAND AT CRACKLEY WOOD, BIRCHES WOOD AND BROADWELLS WOOD, KENILWORTH, WARWICKSHIRE SHOWN COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON PLAN B ANNEXED TO THE PARTICULARS OF CLAIM

- (5) ELLIOTT CUCIUREAN
(6) LARCH MAXEY
(7) PAUL SANDISON
(8) TERRY SANDISON

Defendants / Respondents

ORDER

EXTENDING THE DURATION OF THE INJUNCTION MADE BY MARCUS SMITH J ON 19 JANUARY 2021

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR 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.

FURTHER TO the Order made in these proceedings by Andrews J on 17 March 2020 (“the **March 2020 Order**”), **AND** the extensions made by Marcus Smith J on 17 December 2020 (“the **December 2020 Order**”) and on 19 January 2021 (sealed on 28 January) (“the **January 2021 Order**”).

AND UPON the Claimants’ application by Application Notice dated 26 March 2021, pursuant to the provisions at paragraphs 11-15 of the January 2021 Order, to extend the duration of the injunction contained at paragraphs 3 to 5 of the January 2021 Order and to add the Sixth to Eighth named Defendants (“the **Substantive Amendment Application**”).

AND UPON hearing Mr Michael Fry and Mr Jonathan Welch, counsel for the Claimants; and Fifth Defendant, Seventh Defendant and Eighth Defendant (appearing in person without representation).

AND UPON reading the Application Notice dated 26 March 2021 and the two witness statements of Mr Richard Jordan (dated 26 March 2021 and 9 April 2021).

AND UPON the Claimants indicating that they are content to provide to any named Defendants or persons unknown copies of further evidence or other documents filed in these proceedings 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’ renewed 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.

IT IS ORDERED THAT:

Continuation of January 2021 Order

1. The long-stop date of 30 April 2021 at paragraph 5 of the January 2021 Order be deleted, and the injunctions at paragraphs 3 to 5 of the January 2021 Order shall continue until 31 October 2022 or further order.

2. The injunction at paragraphs 3 to 5 of the January 2021 Order (as amended by paragraph 1 above) shall, further, apply to the Fifth to Eighth Defendants as well as the First and Second Defendants. Accordingly, the injunction which continues as against the First and Second and Fifth to Eighth Defendants is – for the avoidance of doubt – henceforth as set out in paragraphs 3 to 5 of this order.

Injunction in force

3. With immediate effect, and save for the matters set out in paragraph 4 of this Order:
 - 3.1 The First Defendant and Fifth to Eighth Defendants and each of them are forbidden from entering or remaining upon the Cubbington Land, being the land shaded green, blue and pink and outlined red on Plan A (“the **Cubbington Site**”); and
 - 3.2 The Second Defendant and Fifth to Eighth Defendants and each of them are forbidden from entering or remaining upon the Crackley Land, being the land shaded green, blue and pink and outlined red on Plan B (“the **Crackley Site**”).
4. Nothing in paragraph 3 of this Order:
 - 4.1 Shall prevent any person from exercising their rights over any open public right of way over the land. Those public rights of way shall, for the purposes of this Order, include the “unofficial footpath” between two points of the public footpath “PROW 130” in the location indicated on Plan C annexed to the Particulars of Claim and reproduced as an annexe to this Order;
 - 4.2 Shall affect any private rights of access over the Land held by any neighbouring landowner.
5. The order at paragraph 3 above shall remain in effect until trial or further order or, if earlier, a long-stop date of 31 October 2022.

Service

6. Pursuant to CPR r.6.27, the steps taken by the Claimants to serve this Substantive Amendment Application on the First, Second and Fifth to Eighth

Defendants shall amount to good and proper service of the Substantive Amendment Application on those defendants.

7. Pursuant to CPR r. 6.27 and r. 81.4(c) and (d) service of this Order on the First and Second Defendants shall be dealt with as follows:

7.1 The Claimants shall affix sealed copies of this Order in transparent envelopes in at least one location within the Cubbington Land and in at least one location within the Crackley Land.

7.2 The Claimants shall position (four) 4 signs, at the four locations marked on Plans A and B with red crosses, which are approximately 1.5m x 1m in size, advertising the existence of this Order (together with a map of the Land of at least A2 size) and providing a web link and the Claimant's solicitors contact details for copies of the Order (or further information in relation to it.)

7.3 The Claimants shall email a copy of the Order to the following email addresses:

(i) crackleyresidents@hotmail.co.uk

(ii) peter.delow@ntlworld.com

(iii) wendyhoulston@hotmail.com

(iv) helpstophs2@gmail.com

7.4 The Claimants shall further advertise the existence of this order in a prominent location on the websites:

(i) <https://hs2inwarwicks.commonplace.is/>; and

(ii) <https://www.gov.uk/government/organisations/high-speed-two-limited>,

together with a link to download an electronic copy of this Order.

7.5 The Claimants shall also leave sealed copies of this Order at the protestor campsite marked "Camp 2" on the Plans.

7.6 The Claimants shall, every six months, secure publication of a notice and map of the injunction in the Leamington Observer.

8. The taking of such steps set out at paragraph 7 shall be good and sufficient service of this Order on the First and Second Defendants and each of them. This Order shall be deemed served on those Defendants the date that the last of the above steps is taken, and shall be verified by a certificate of service.
9. Pursuant to CPR r. 6.27 and r. 81.4(c) and (d) 8 service of this Order on the Fifth to Eighth Defendants shall be dealt with by sending a copy of this Order to:
 - 9.1 in the case of the Fifth Defendant, his solicitors by email to: nhall@robertlizar.com;
 - 9.2 in the case of the Sixth to Eighth Defendants, personally by email to those email addresses held by the Claimants' solicitors.
10. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below).

Further directions

11. 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 rob.shaw@dlapiper.com. Schedule A to this Order indicates the process which should be followed for any such application.
12. 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 (unless they are already named as a defendant).
13. Any person wishing for this matter to proceed to trial and to defend the claim must serve an Acknowledgment of Service pursuant to CPR Part 8.3. Schedule B to this Order provides an indicative process for this course of action.
14. The Claimants have liberty to apply to extend or vary this Order or for further directions.

15. Save as provided for above, the Claim be stayed generally with liberty to restore.
16. Costs reserved. If the Claimants intend to seek a costs order against any person in respect of any future applications in these proceedings or any future hearing, then they shall seek to give reasonable advance notice of that fact to that person.

Communications with the Court and Claimants

17. All communications to the Court about this Order (which should quote the case number) should be sent to:

Court Manager
Birmingham Civil and Family Justice Centre
High Court of Justice
Chancery Division
Priory Courts
33 Bull Street
Birmingham B4 6DS

The telephone number is 0121 681 4441. The offices are open weekdays 10.00am to 4.00pm.

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

DLA Piper UK LLP of:
1 St Paul's Place
Sheffield S1 2JX
Tel: +44 114 283 3312
Email: rob.shaw@dlapiper.com
Ref: RXS/380900/346

Dated: 3 May 2021

SCHEDULE A – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 10 above, any Defendant or any other person affected by this Order wishes to apply to vary or discharge this Order, to ensure effective case management by the Court the following indicative steps are expected to be followed (although these are not binding directions):

1. Any party seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):
 - (a) An N244 application form¹;
 - (b) Written grounds for the application (i.e. reasons for the proposed variation/discharge of the Order) – this may be contained within the N244 application form or on in a separate document; and
 - (c) A witness statement(s) containing and/or appending all of the evidence to be relied upon in support of the application.
2. In order to file the above documents with the Court, the applicant should:
 - (a) Send physical copies of the documents to the address at paragraph 17 of this Order; and/or
 - (b) Speak to the Court to obtain an address to send electronic copies of the documents to.
3. In order to serve the above documents on the Claimants, the applicant should:
 - (a) Send physical copies of the documents to the address at paragraph 18 of this Order; and/or
 - (b) Send electronic copies of the documents to the e-mail address at paragraph 18 above.
4. The person making the application should indicate to the Court and Claimants whether they consider the matter requires a court hearing or can be dealt with by the judge reviewing the paper application and any response from the Claimants.

¹ See the following link which provides a digital version of the form, and guidance notes:
<https://www.gov.uk/government/publications/form-n244-application-notice>;

5. Thereafter the Claimants (i.e. HS2) shall have 14 days to file and serve evidence and submissions in response, including as to whether an oral hearing is required to determine the application.
6. Within 21 days, the Court shall decide whether a hearing is necessary, and/or may request from the parties evidence on any further matters necessary to determine the application. If the Court decides that a hearing is necessary, it shall seek to schedule the hearing (accommodating availabilities of the parties) within 42 days (6 weeks).
7. If the Court decides that further evidence is needed from either party, it may set strict deadlines by which that evidence must be filed. Both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.

SCHEDULE B - STEPS TO BRING MATTER TO TRIAL

If, in accordance with paragraph 12 above, any Defendant or other person affected by this Order wishes to apply bring the Claimant's proceedings (whether as a whole or in part) to final trial, to ensure effective case management by the Court the following indicative steps are expected to be followed (although these are not binding directions):

1. If not already so, the party must apply to become a named defendant to the claim. This can be done by filing with the court (i.e. send to the court) and serving (i.e. send to the Claimants)
 - (a) An N244 Application form²; and
 - (b) a short statement explaining the reason for applying to become a named defendant (i.e. in order to contest the Claimants' claim).
2. In order to file the above with the Court, the applicant should:
 - (a) Send physical copies to the address at paragraph 17 of this Order; and/or
 - (b) Speak to the Court to obtain an address to send electronic copies to.
3. In order to serve the above on the Claimant, the applicant should:

² See the following link which provides a digital version of the form, and guidance notes:
<https://www.gov.uk/government/publications/form-n244-application-notice>;

- (c) Send physical copies to the address at paragraph 18 of this Order;
and/or
 - (d) Send electronic copies to the to the e-mail address at paragraph 18
above.
4. The party seeking to contest the claim and bring the matter to trial must then file and serve (see above as to how this is to be done):
- (a) An Acknowledgement of Service using form N210,³ explaining the reasons for contesting the claim (whether as a whole or in part); and
 - (b) A witness statement(s) containing and/or appending all the evidence to be relied upon in support of the Acknowledgment of Service (i.e. evidence explaining the basis for contesting the claim).
5. Thereafter the Claimants (HS2) shall have 14 days to file and serve any evidence in reply.
6. The Court shall then list a hearing date for the final trial of this matter or a hearing date for a Case Management Conference, at which it will give directions to parties for any further steps required prior to the final trial (such as filing further evidence). The Court may set strict deadlines by which the further steps must be taken and both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.

SCHEDULE C - USEFUL REFERENCES AND RESOURCES

The attention of all parties is drawn to the following references and resources:

Bar Pro Bono Unit – A possible avenue for obtaining free legal advice and/or representation: <https://weareadvocate.org.uk/>

Support Through Court (formerly Personal Support Unit) – An organisation supporting litigants in person: <https://www.supportthroughcourt.org/>

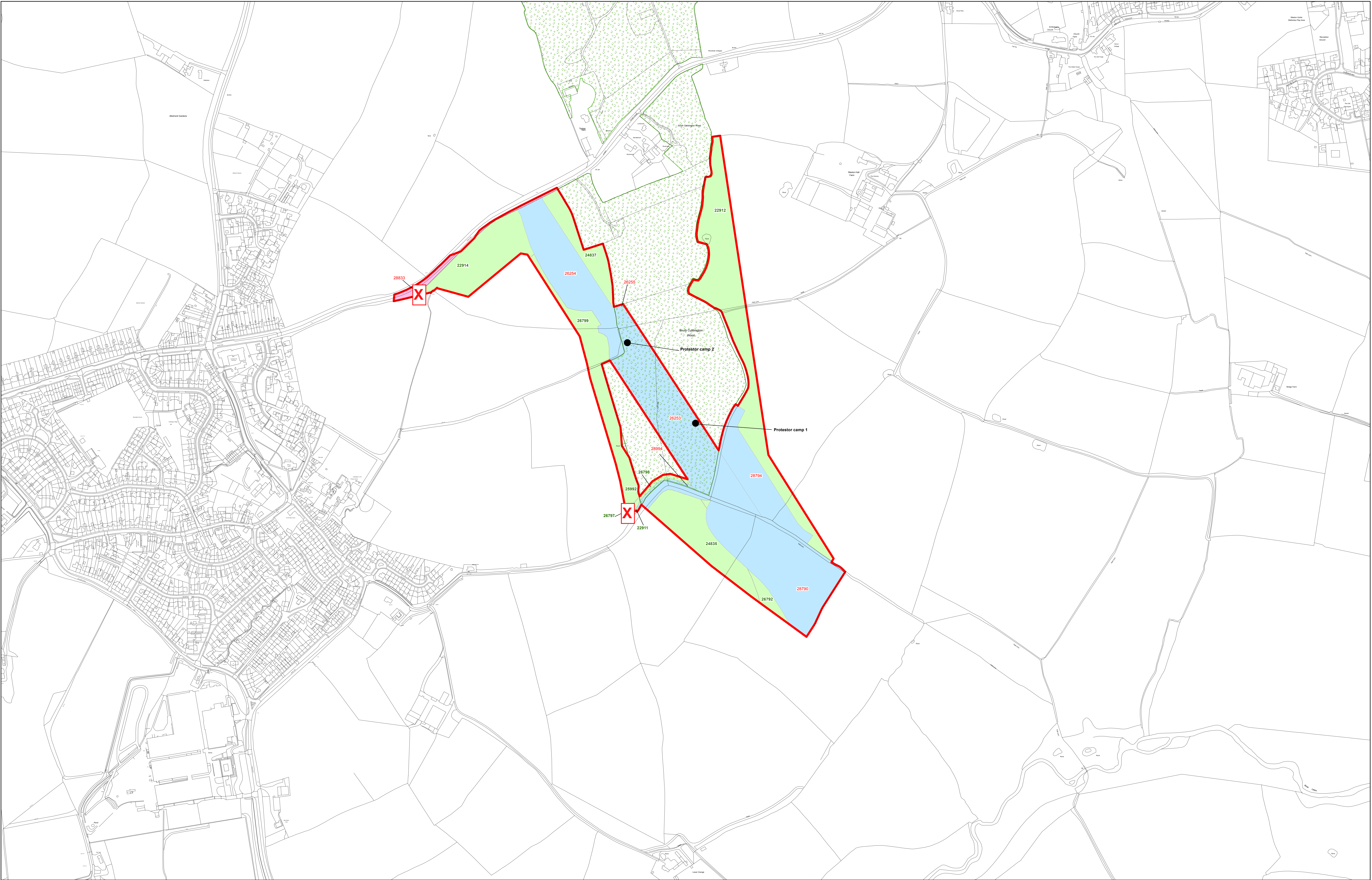
³ <https://www.gov.uk/government/publications/form-n210-acknowledgment-of-service-cpr-part-8>

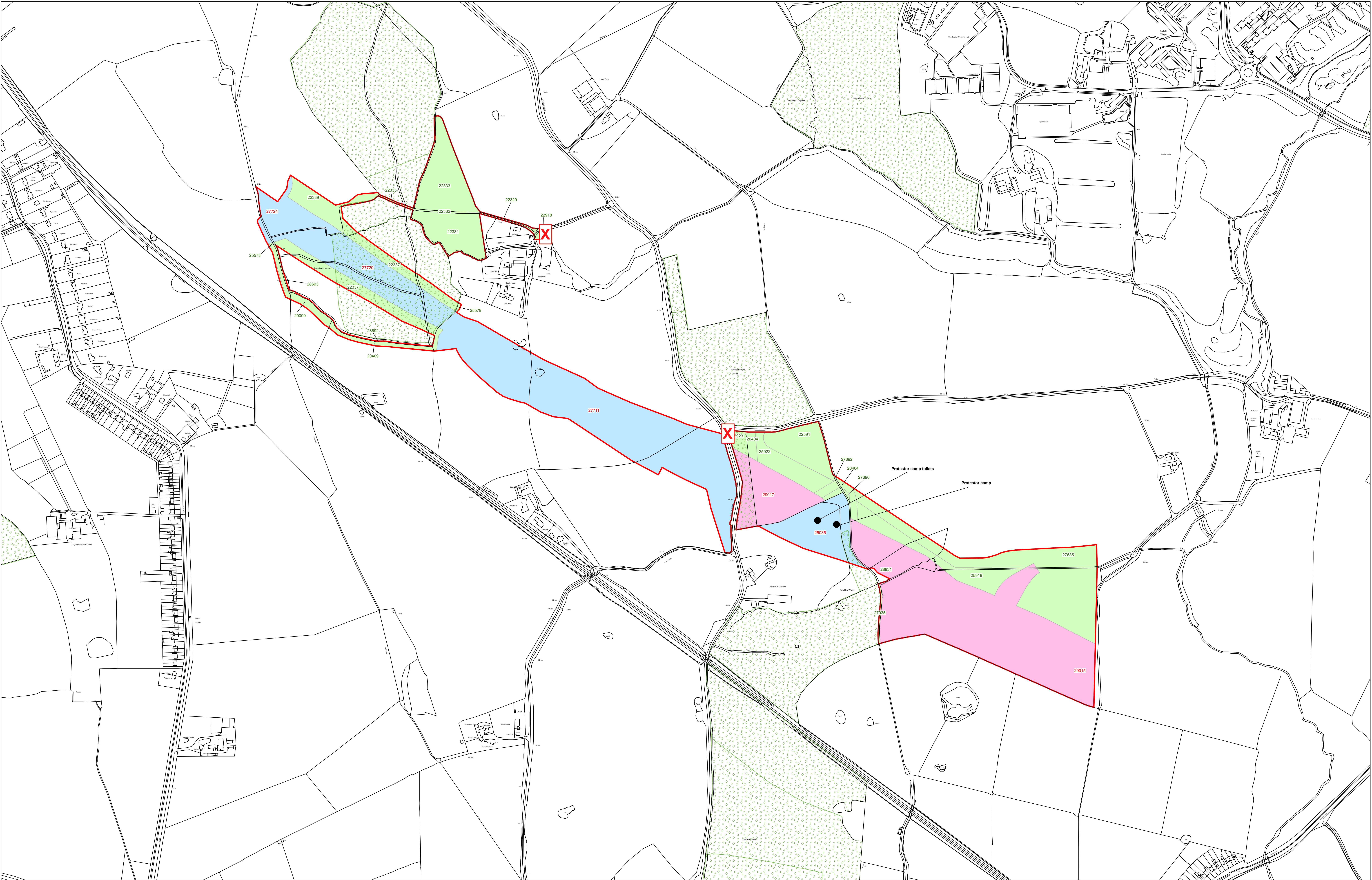
Chancery Division Guide: <https://www.gov.uk/government/publications/chancery-guide>

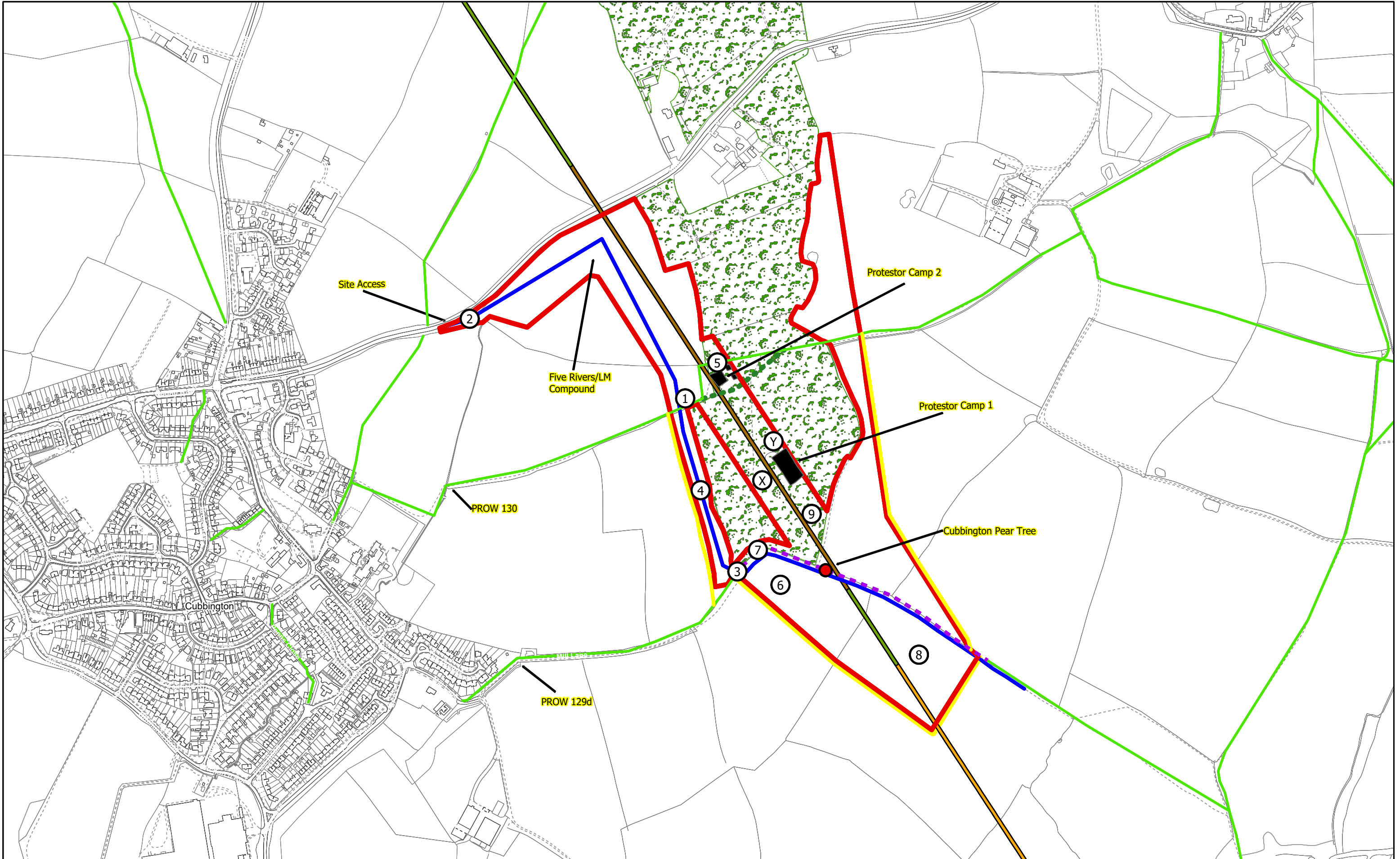
Chancery Division Interim Applications Guide for Litigants in Person:
<https://www.judiciary.uk/publications/guide-litigants-person-chancery/>

Civil Procedure Rules Part 8: <https://www.justice.gov.uk/courts/procedure-rules/civil/rules/part08>

Help with Court Fees website: <https://www.gov.uk/get-help-with-court-fees>







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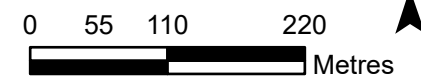
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- | | | | |
|----------------------------|--------------------------------|-------------------------|------------------|
| ○ Incidents | ■ Ancient Woodland | ● Unofficial Footpath | ■ Embankment |
| ● Cubbington Pear Tree | ■ Closed Public Right of Way | ■ Haul Road | ■ Retaining Wall |
| ■ Land Required | ■ Existing Public Right of Way | ■ HS2 Trace Design Type | ■ Viaduct |
| ■ Protestor Camp Locations | ■ Diverted Public Right of Way | ■ Cutting | |

Plan C



LM-JV, 6th Floor,
The Cornerblock,
2 Cornwall Street,
Birmingham, B3 2DX



C313

12/02/20

The Secretary
Severn Trent Water Limited



Date: 24 February 2022

Our Ref: 2LR01-MMD-LP-LPN-A000-308914

Dear Sir/Madam

HIGH SPEED RAIL (WEST MIDLANDS – CREWE) ACT 2021 (“the HS2 Act 2021”) – service of notice under Schedule 15 of the HS2 Act 2021

Please find enclosed a notice served in accordance with the provisions of the above Act for the temporary possession of land referred to in the notice. The land includes apparatus belonging to you.

Please note, Sections 271 to 273 of the Town and Country Planning Act 1990 (as incorporated and amended by Section 11 of the HS2 Act 2021) and Paragraph 19(2) of Schedule 32 (Part 2 – Electricity Gas, Water and Sewerage Undertakers) and Part 3 (Electronic Communication Code Networks) of the HS2 Act 2021 continue to apply to the land referred to in the notice.

This means that statutory undertakers’ and telecoms code operators’ apparatus on the land in the attached notice benefits from further protective provisions. The attached notice will not authorise the removal by High Speed Two (HS2) Limited (HS2 Ltd) of statutory undertaker or relevant telecoms apparatus on the land, or the extinguishment of existing statutory undertaker or relevant telecoms’ rights in the land.

If removal of your apparatus or extinguishment of your rights in the land is required in the future, then the procedure under Schedule 32 and/or Section 11 of the HS2 Act 2021 will apply (as modified by any arrangements we have with you, if applicable). This means further contact will be made with you first.

For further information on possession/acquisition of the land described in the attached notice, please contact Anthony Shepherdson on 07778 543490 or email at anthony.shepherdson@hs2.org.uk.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Mike Hickson'.

Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited as Agent for and on behalf of the Secretary of State for Transport

Enc. Notice



The Secretary
Severn Trent Water Limited



Please read this letter. It affects your property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308914

Dear Sir/Madam

Land: as per the enclosed schedule and plan

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021 – notice of temporary possession

The new high speed rail line between the West Midlands and Crewe, known as High Speed Two (HS2) Phase 2a, received Parliamentary approval on 11 February 2021. This follows initial investigation works which started in 2020, as part of the preparation for constructing HS2 Phase 2a.

I am writing to you today because, as you may be aware, your land and/or property has been identified as being required on a temporary basis during the construction of HS2 Phase 2a. I understand that this may be distressing news and I want to reassure you that my team are here to help you through the process and answer any questions you may have.

You can contact our HS2 Helpdesk all day every day on the details at the end of this letter.

What do I need to know?

Attached is a formal legal notice which authorises High Speed Two (HS2) Limited (HS2 Ltd) (on behalf of the Secretary of State for Transport) to take temporary possession of your land and/or property for the project. I also enclose a plan of your land and/or property, shown in green.

We are committed to ensuring our works are conducted in a professional manner and completed to a good standard. We and our contractors are required to leave your land within one year of the completion of the project works carried out on your land.

Will you restore my land once you have finished your works?

Yes, we must restore the land, and this will be agreed with the owners of the land and the relevant planning authority. In the event that agreement cannot be reached between those parties, the decision will be made by the appropriate Ministers of State.

Will I receive compensation?

You may be entitled to compensation for any loss you may experience from HS2's temporary possession of your land and/or property. We recommend you appoint professional advisors in respect of any compensation claim, the reasonable costs of any successful claim will be paid by HS2 Ltd. To make a claim, write in the first instance to Land and Property Compensation Claims, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.

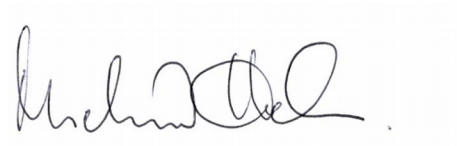
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes of free professional advice.

What happens now?

One of our property advisors will be in contact with you to discuss what this means for you, however in the meantime, if you have any questions regarding the above or about the proposals for HS2, please contact our HS2 Helpdesk on freephone 08081 434 434 or at hs2enquiries@hs2.org.uk.

Dated: 24 February 2022

Yours faithfully,



Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited

enc. Notice

Notice No. N-308914
Date: 24 February 2022

The Secretary
Severn Trent Water Limited



Please read this letter. It affects your land or property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308914

Dear Sir/Madam

Confirmation of Health and Safety matters on your land or property

Reference Land: as per the enclosed notice schedule and plan

As HS2 Ltd begins work on Phase 2a of the new railway between the West Midlands and Crewe, we are writing to you to ask some questions about your land or property.

Our team consider health and safety to be our top priority and we wish to protect anyone who may be on or near our sites, including the local community and the individuals that are involved in the construction of the High Speed Two Project.

We would therefore like to request from you any information you have relating to risks or health and safety matters relating to the land/property identified in the attached notice.

Please provide any information that you have in relation to the questions asked below, as well as anything else that you consider to be relevant.

Please return this page along with the following completed page back to HS2 Ltd within 14 days of receiving it.

You can do this by:

- Emailing a scanned copy of the completed pages to lpdutyofcare@hs2.org.uk
- Or by posting to the document or a copy to: *Land and Property Duty of Care, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA.*

If you need any further assistance, please contact our HS2 Helpdesk at any time on freephone 08081 434 434 or by emailing hs2enquiries@hs2.org.uk.

Please provide any information that you may have in relation to the following issues:

Notice No. N-308914		
Are you aware of the presence of asbestos, contaminated land or hazardous substances on the land/property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are architectural drawings / design plans available relating to structures on the property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information regarding the presence of installed plant or equipment on site, <i>e.g. electrical sub-stations, lifts or fixed air conditioning systems?</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to underground, surface or overhead utilities including gas, electrical or water services?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to environmental risks including any Environmental Agency permits or protections relating to the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to previous land use risks, fly tipping or invasive plants?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any other information relating to safety, health or environmental risks associated with the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Is any part of the land/property known to be derelict or in poor condition, and if so what is the extent and nature of the damage? Are any areas unsafe for access?		
<i>If yes to any of the above please provide further information here:</i>		
Are you aware of any other health and safety risks on the land and/or property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<i>If yes to the above please provide further information here:</i>		

We will share this information with organisations working on HS2 Ltd's behalf to minimise the risk of injury, health impacts and wider environmental concerns.

Thank you for your support in this matter.

Yours faithfully,



Mike Hickson OBE
Director of Land & Property
High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

NOTICE OF TEMPORARY POSSESSION OF LAND

To:
The Secretary
Severn Trent Water Limited

Notice No. N-308914



By virtue of Section 13 and Paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 of the High Speed Rail (West Midlands - Crewe) Act 2021 ("the Act") **I HEREBY GIVE YOU NOTICE** that **High Speed Two (HS2) Limited** (HS2 Ltd) as the Nominated Undertaker appointed by the Secretary of State for Transport pursuant to Section 41 of the Act will enter upon and take possession of the land described in the Schedule hereto and shown coloured green or coloured green and hatched over on the plan(s) annexed hereto after the period of **28 days** from the date of service of this notice, for any works or other Phase 2a purpose as is authorised by Schedule 15 of the Act.

You are served with this notice in accordance with paragraph 4(1) of Part 1 of Schedule 15 to the Act, pursuant to which the provisions of Section 13 and Schedule 15 of the Act shall apply to your interest in the land referred to in the attached Schedule.

In accordance with Schedule 15 of the Act, the Nominated Undertaker may, in connection with the construction of the works authorised by the Act, enter upon and take temporary possession of the land. The Nominated Undertaker must give not less than 28 days' notice of its intention to enter and take possession of the land. The Nominated Undertaker may not remain in possession of the land for longer than one year after the completion of the works unless the owner agrees to a longer period or, unless the provisions of Paragraph 4(3) of Schedule 15 apply, and within that period powers are exercised under the Act to serve a notice to treat or execute a General Vesting Declaration over the land.

Under paragraphs 8(1) and 9(1) of Part 3 of Schedule 15 to the Act, all private and general rights over land of which HS2 Ltd takes possession under paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 are suspended and unenforceable for as long as HS2 Ltd remains in lawful possession of the land. Under paragraph 8(2) and 9(2) of Part 3 of Schedule 15, HS2 Ltd may, in relation to a private or general right, direct that paragraph 8(1) or 9(1) does not apply to the right, or that it applies to the right only to the extent specified in that direction. Any directions made under paragraphs 8(1) or 9(1) appear in the Schedule

hereto and shall be effective from the date of this Notice. The Nominated Undertaker may make further directions (including revoking or amending existing directions) after the date of this Notice or confer such rights on the landowner or other parties as it may specify in the Schedule hereto during the period for which the land is subject to temporary possession.

In the event that the Nominated Undertaker is refused the possession required under this notice it has the power to issue a warrant to the High Court Enforcement Officer to enforce these rights. The High Court Enforcement Officer will be able to enter the property to secure possession.

Paragraph 4(4) of Part 1 of Schedule 15 provides that compensation must be paid by the Nominated Undertaker to the owners and occupiers of land over which temporary possession is taken by virtue of paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 for any loss which is suffered by reason of the temporary occupation of the land.

Dated: 24 February 2022

High Speed Two (HS2) Limited

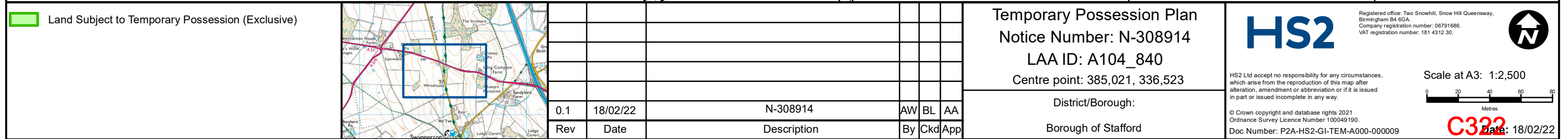
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

Notice No. N-308914

SCHEDULE

Borough of Stafford

(1) Plot No.	(2) Description
122980	7532.65 square metres, or thereabouts, of woodland and ponds (Stabhill Plantation)
122982	4664.90 square metres, or thereabouts, of agricultural land, woodland and access track carrying public bridleway (Swynnerton 54), (Top Lane)





The Chief Executive
Staffordshire County Council



Please read this letter. It affects your property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308915

Dear Sir/Madam

Land: as per the enclosed schedule and plan

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021 – notice of temporary possession

The new high speed rail line between the West Midlands and Crewe, known as High Speed Two (HS2) Phase 2a, received Parliamentary approval on 11 February 2021. This follows initial investigation works which started in 2020, as part of the preparation for constructing HS2 Phase 2a.

I am writing to you today because, as you may be aware, your land and/or property has been identified as being required on a temporary basis during the construction of HS2 Phase 2a. I understand that this may be distressing news and I want to reassure you that my team are here to help you through the process and answer any questions you may have.

You can contact our HS2 Helpdesk all day every day on the details at the end of this letter.

What do I need to know?

Attached is a formal legal notice which authorises High Speed Two (HS2) Limited (HS2 Ltd) (on behalf of the Secretary of State for Transport) to take temporary possession of your land and/or property for the project. I also enclose a plan of your land and/or property, shown in green.

We are committed to ensuring our works are conducted in a professional manner and completed to a good standard. We and our contractors are required to leave your land within one year of the completion of the project works carried out on your land.

Will you restore my land once you have finished your works?

Yes, we must restore the land, and this will be agreed with the owners of the land and the relevant planning authority. In the event that agreement cannot be reached between those parties, the decision will be made by the appropriate Ministers of State.

Will I receive compensation?

You may be entitled to compensation for any loss you may experience from HS2's temporary possession of your land and/or property. We recommend you appoint professional advisors in respect of any compensation claim, the reasonable costs of any successful claim will be paid by HS2 Ltd. To make a claim, write in the first instance to Land and Property Compensation Claims, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.

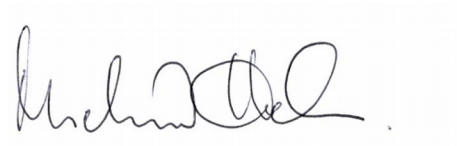
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Dated: 24 February 2022

Yours faithfully,



Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited

enc. Notice

The Chief Executive
Staffordshire County Council



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If you need any further assistance, please contact our HS2 Helpdesk at any time on freephone 08081 434 434 or by emailing hs2enquiries@hs2.org.uk.

Please provide any information that you may have in relation to the following issues:

Notice No. N-308915		
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Are you aware of any information regarding the presence of installed plant or equipment on site, <i>e.g. electrical sub-stations, lifts or fixed air conditioning systems?</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
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Thank you for your support in this matter.

Yours faithfully,



Mike Hickson OBE
Director of Land & Property
High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

NOTICE OF TEMPORARY POSSESSION OF LAND

To:
The Chief Executive
Staffordshire County Council

Notice No. N-308915

By virtue of Section 13 and Paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 of the High Speed Rail (West Midlands - Crewe) Act 2021 ("the Act") **I HEREBY GIVE YOU NOTICE** that **High Speed Two (HS2) Limited** (HS2 Ltd) as the Nominated Undertaker appointed by the Secretary of State for Transport pursuant to Section 41 of the Act will enter upon and take possession of the land described in the Schedule hereto and shown coloured green or coloured green and hatched over on the plan(s) annexed hereto after the period of **28 days** from the date of service of this notice, for any works or other Phase 2a purpose as is authorised by Schedule 15 of the Act.

You are served with this notice in accordance with paragraph 4(1) of Part 1 of Schedule 15 to the Act, pursuant to which the provisions of Section 13 and Schedule 15 of the Act shall apply to your interest in the land referred to in the attached Schedule.

In accordance with Schedule 15 of the Act, the Nominated Undertaker may, in connection with the construction of the works authorised by the Act, enter upon and take temporary possession of the land. The Nominated Undertaker must give not less than 28 days' notice of its intention to enter and take possession of the land. The Nominated Undertaker may not remain in possession of the land for longer than one year after the completion of the works unless the owner agrees to a longer period or, unless the provisions of Paragraph 4(3) of Schedule 15 apply, and within that period powers are exercised under the Act to serve a notice to treat or execute a General Vesting Declaration over the land.

Under paragraphs 8(1) and 9(1) of Part 3 of Schedule 15 to the Act, all private and general rights over land of which HS2 Ltd takes possession under paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 are suspended and unenforceable for as long as HS2 Ltd remains in lawful possession of the land. Under paragraph 8(2) and 9(2) of Part 3 of Schedule 15, HS2 Ltd may, in relation to a private or general right, direct that paragraph 8(1) or 9(1) does not apply to the right, or that it applies to the right only to the extent specified in that direction. Any directions made under paragraphs 8(1) or 9(1) appear in the Schedule

hereto and shall be effective from the date of this Notice. The Nominated Undertaker may make further directions (including revoking or amending existing directions) after the date of this Notice or confer such rights on the landowner or other parties as it may specify in the Schedule hereto during the period for which the land is subject to temporary possession.

In the event that the Nominated Undertaker is refused the possession required under this notice it has the power to issue a warrant to the High Court Enforcement Officer to enforce these rights. The High Court Enforcement Officer will be able to enter the property to secure possession.

Paragraph 4(4) of Part 1 of Schedule 15 provides that compensation must be paid by the Nominated Undertaker to the owners and occupiers of land over which temporary possession is taken by virtue of paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 for any loss which is suffered by reason of the temporary occupation of the land.

Dated: 24 February 2022

High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

Notice No. N-308915

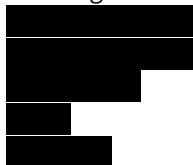
SCHEDULE

Borough of Stafford

(1) Plot No.	(2) Description
122982	4664.90 square metres, or thereabouts, of agricultural land, woodland and access track carrying public bridleway (Swynnerton 54), (Top Lane)
122985	3201.56 square metres, or thereabouts, of verge (Stone Road)
124598	1676.93 square metres, or thereabouts, of verge and access splay (Stone Road)



The Secretary
Orbel Agriculture Limited



Please read this letter. It affects your property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308917

Dear Sir/Madam

Land: as per the enclosed schedule and plan

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021 – notice of temporary possession

The new high speed rail line between the West Midlands and Crewe, known as High Speed Two (HS2) Phase 2a, received Parliamentary approval on 11 February 2021. This follows initial investigation works which started in 2020, as part of the preparation for constructing HS2 Phase 2a.

I am writing to you today because, as you may be aware, your land and/or property has been identified as being required on a temporary basis during the construction of HS2 Phase 2a. I understand that this may be distressing news and I want to reassure you that my team are here to help you through the process and answer any questions you may have.

You can contact our HS2 Helpdesk all day every day on the details at the end of this letter.

What do I need to know?

Attached is a formal legal notice which authorises High Speed Two (HS2) Limited (HS2 Ltd) (on behalf of the Secretary of State for Transport) to take temporary possession of your land and/or property for the project. I also enclose a plan of your land and/or property, shown in green.

We are committed to ensuring our works are conducted in a professional manner and completed to a good standard. We and our contractors are required to leave your land within one year of the completion of the project works carried out on your land.

Will you restore my land once you have finished your works?

Yes, we must restore the land, and this will be agreed with the owners of the land and the relevant planning authority. In the event that agreement cannot be reached between those parties, the decision will be made by the appropriate Ministers of State.

Will I receive compensation?

You may be entitled to compensation for any loss you may experience from HS2's temporary possession of your land and/or property. We recommend you appoint professional advisors in respect of any compensation claim, the reasonable costs of any successful claim will be paid by HS2 Ltd. To make a claim, write in the first instance to Land and Property Compensation Claims, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.


If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes of free professional advice.

What happens now?

One of our property advisors will be in contact with you to discuss what this means for you, however in the meantime, if you have any questions regarding the above or about the proposals for HS2, please contact our HS2 Helpdesk on freephone 08081 434 434 or at hs2enquiries@hs2.org.uk.

Dated: 24 February 2022

Yours faithfully,



Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited

enc. Notice

Notice No. N-308917
Date: 24 February 2022

The Secretary
Orbel Agriculture Limited



Please read this letter. It affects your land or property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308917

Dear Sir/Madam

Confirmation of Health and Safety matters on your land or property

Reference Land: as per the enclosed notice schedule and plan

As HS2 Ltd begins work on Phase 2a of the new railway between the West Midlands and Crewe, we are writing to you to ask some questions about your land or property.

Our team consider health and safety to be our top priority and we wish to protect anyone who may be on or near our sites, including the local community and the individuals that are involved in the construction of the High Speed Two Project.

We would therefore like to request from you any information you have relating to risks or health and safety matters relating to the land/property identified in the attached notice.

Please provide any information that you have in relation to the questions asked below, as well as anything else that you consider to be relevant.

Please return this page along with the following completed page back to HS2 Ltd within 14 days of receiving it.

You can do this by:

- Emailing a scanned copy of the completed pages to lpdutyofcare@hs2.org.uk
- Or by posting to the document or a copy to: *Land and Property Duty of Care, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA.*

If you need any further assistance, please contact our HS2 Helpdesk at any time on freephone 08081 434 434 or by emailing hs2enquiries@hs2.org.uk.

Please provide any information that you may have in relation to the following issues:

Notice No. N-308917		
Are you aware of the presence of asbestos, contaminated land or hazardous substances on the land/property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are architectural drawings / design plans available relating to structures on the property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information regarding the presence of installed plant or equipment on site, <i>e.g. electrical sub-stations, lifts or fixed air conditioning systems?</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to underground, surface or overhead utilities including gas, electrical or water services?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to environmental risks including any Environmental Agency permits or protections relating to the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to previous land use risks, fly tipping or invasive plants?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any other information relating to safety, health or environmental risks associated with the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Is any part of the land/property known to be derelict or in poor condition, and if so what is the extent and nature of the damage? Are any areas unsafe for access?		
<i>If yes to any of the above please provide further information here:</i>		
Are you aware of any other health and safety risks on the land and/or property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<i>If yes to the above please provide further information here:</i>		

We will share this information with organisations working on HS2 Ltd's behalf to minimise the risk of injury, health impacts and wider environmental concerns.

Thank you for your support in this matter.

Yours faithfully,



Mike Hickson OBE
Director of Land & Property
High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

NOTICE OF TEMPORARY POSSESSION OF LAND

To:
The Secretary
Orbel Agriculture Limited

Notice No. N-308917



By virtue of Section 13 and Paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 of the High Speed Rail (West Midlands - Crewe) Act 2021 ("the Act") **I HEREBY GIVE YOU NOTICE** that **High Speed Two (HS2) Limited** (HS2 Ltd) as the Nominated Undertaker appointed by the Secretary of State for Transport pursuant to Section 41 of the Act will enter upon and take possession of the land described in the Schedule hereto and shown coloured green or coloured green and hatched over on the plan(s) annexed hereto after the period of **28 days** from the date of service of this notice, for any works or other Phase 2a purpose as is authorised by Schedule 15 of the Act.

You are served with this notice in accordance with paragraph 4(1) of Part 1 of Schedule 15 to the Act, pursuant to which the provisions of Section 13 and Schedule 15 of the Act shall apply to your interest in the land referred to in the attached Schedule.

In accordance with Schedule 15 of the Act, the Nominated Undertaker may, in connection with the construction of the works authorised by the Act, enter upon and take temporary possession of the land. The Nominated Undertaker must give not less than 28 days' notice of its intention to enter and take possession of the land. The Nominated Undertaker may not remain in possession of the land for longer than one year after the completion of the works unless the owner agrees to a longer period or, unless the provisions of Paragraph 4(3) of Schedule 15 apply, and within that period powers are exercised under the Act to serve a notice to treat or execute a General Vesting Declaration over the land.

Under paragraphs 8(1) and 9(1) of Part 3 of Schedule 15 to the Act, all private and general rights over land of which HS2 Ltd takes possession under paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 are suspended and unenforceable for as long as HS2 Ltd remains in lawful possession of the land. Under paragraph 8(2) and 9(2) of Part 3 of Schedule 15, HS2 Ltd may, in relation to a private or general right, direct that paragraph 8(1) or 9(1) does not apply to the right, or that it applies to the right only to the extent specified in that direction. Any directions made under paragraphs 8(1) or 9(1) appear in the Schedule

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Dated: 24 February 2022

High Speed Two (HS2) Limited

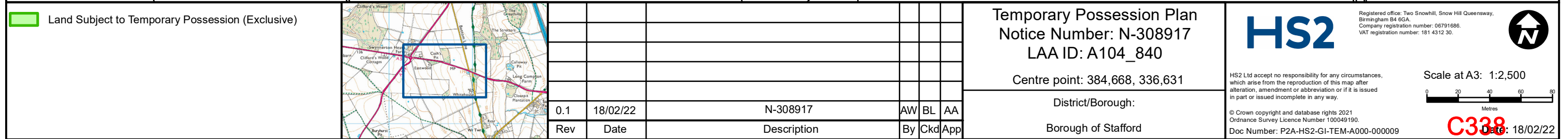
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

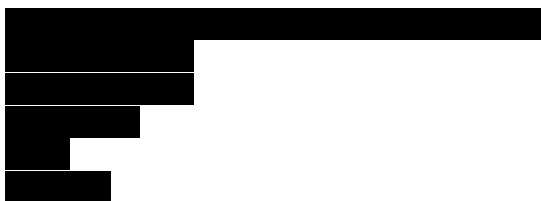
Notice No. N-308917

SCHEDULE

Borough of Stafford

(1) Plot No.	(2) Description
122980	7532.65 square metres, or thereabouts, of woodland and ponds (Stabhill Plantation)
122981	6509.22 square metres, or thereabouts, of woodland, pond and access tracks (Stabhill Plantation)
122982	4664.90 square metres, or thereabouts, of agricultural land, woodland and access track carrying public bridleway (Swynnerton 54), (Top Lane)
122983	52178.63 square metres, or thereabouts, of agricultural land, hedgerows and pond (Bottom Lane)
122984	14372.70 square metres, or thereabouts, of woodland (Cash's Pit)
124600	967.70 square metres, or thereabouts, of agricultural land (Stone Road)
124601	594.54 square metres, or thereabouts, of verge and access splay (Stone Road)





Please read this letter. It affects your property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308916

Dear 

Land: as per the enclosed schedule and plan

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021 – notice of temporary possession

The new high speed rail line between the West Midlands and Crewe, known as High Speed Two (HS2) Phase 2a, received Parliamentary approval on 11 February 2021. This follows initial investigation works which started in 2020, as part of the preparation for constructing HS2 Phase 2a.

I am writing to you today because, as you may be aware, your land and/or property has been identified as being required on a temporary basis during the construction of HS2 Phase 2a. I understand that this may be distressing news and I want to reassure you that my team are here to help you through the process and answer any questions you may have.

You can contact our HS2 Helpdesk all day every day on the details at the end of this letter.

What do I need to know?

Attached is a formal legal notice which authorises High Speed Two (HS2) Limited (HS2 Ltd) (on behalf of the Secretary of State for Transport) to take temporary possession of your land and/or property for the project. I also enclose a plan of your land and/or property, shown in green.

We are committed to ensuring our works are conducted in a professional manner and completed to a good standard. We and our contractors are required to leave your land within one year of the completion of the project works carried out on your land.

Will you restore my land once you have finished your works?

Yes, we must restore the land, and this will be agreed with the owners of the land and the relevant planning authority. In the event that agreement cannot be reached between those parties, the decision will be made by the appropriate Ministers of State.

Will I receive compensation?

You may be entitled to compensation for any loss you may experience from HS2's temporary possession of your land and/or property. We recommend you appoint professional advisors in respect of any compensation claim, the reasonable costs of any successful claim will be paid by HS2 Ltd. To make a claim, write in the first instance to Land and Property Compensation Claims, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.

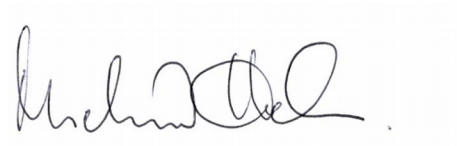
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes of free professional advice.

What happens now?

One of our property advisors will be in contact with you to discuss what this means for you, however in the meantime, if you have any questions regarding the above or about the proposals for HS2, please contact our HS2 Helpdesk on freephone 08081 434 434 or at hs2enquiries@hs2.org.uk.

Dated: 24 February 2022

Yours sincerely,



Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited

enc. Notice



Please read this letter. It affects your land or property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308916

Dear B

Confirmation of Health and Safety matters on your land or property

Reference Land: as per the enclosed notice schedule and plan

As HS2 Ltd begins work on Phase 2a of the new railway between the West Midlands and Crewe, we are writing to you to ask some questions about your land or property.

Our team consider health and safety to be our top priority and we wish to protect anyone who may be on or near our sites, including the local community and the individuals that are involved in the construction of the High Speed Two Project.

We would therefore like to request from you any information you have relating to risks or health and safety matters relating to the land/property identified in the attached notice.

Please provide any information that you have in relation to the questions asked below, as well as anything else that you consider to be relevant.

Please return this page along with the following completed page back to HS2 Ltd within 14 days of receiving it.

You can do this by:

- Emailing a scanned copy of the completed pages to lpdutyofcare@hs2.org.uk
- Or by posting to the document or a copy to: *Land and Property Duty of Care, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA.*

If you need any further assistance, please contact our HS2 Helpdesk at any time on freephone 08081 434 434 or by emailing hs2enquiries@hs2.org.uk.

Please provide any information that you may have in relation to the following issues:

Notice No. N-308916		
Are you aware of the presence of asbestos, contaminated land or hazardous substances on the land/property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are architectural drawings / design plans available relating to structures on the property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information regarding the presence of installed plant or equipment on site, <i>e.g. electrical sub-stations, lifts or fixed air conditioning systems?</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to underground, surface or overhead utilities including gas, electrical or water services?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to environmental risks including any Environmental Agency permits or protections relating to the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to previous land use risks, fly tipping or invasive plants?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any other information relating to safety, health or environmental risks associated with the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Is any part of the land/property known to be derelict or in poor condition, and if so what is the extent and nature of the damage? Are any areas unsafe for access?		
<i>If yes to any of the above please provide further information here:</i>		
Are you aware of any other health and safety risks on the land and/or property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<i>If yes to the above please provide further information here:</i>		

We will share this information with organisations working on HS2 Ltd's behalf to minimise the risk of injury, health impacts and wider environmental concerns.

Thank you for your support in this matter.

Yours sincerely,



Mike Hickson OBE
Director of Land & Property
High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

NOTICE OF TEMPORARY POSSESSION OF LAND

To:

Notice No. N-308916

By virtue of Section 13 and Paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 of the High Speed Rail (West Midlands - Crewe) Act 2021 ("the Act") **I HEREBY GIVE YOU NOTICE** that **High Speed Two (HS2) Limited** (HS2 Ltd) as the Nominated Undertaker appointed by the Secretary of State for Transport pursuant to Section 41 of the Act will enter upon and take possession of the land described in the Schedule hereto and shown coloured green or coloured green and hatched over on the plan(s) annexed hereto after the period of **28 days** from the date of service of this notice, for any works or other Phase 2a purpose as is authorised by Schedule 15 of the Act.

You are served with this notice in accordance with paragraph 4(1) of Part 1 of Schedule 15 to the Act, pursuant to which the provisions of Section 13 and Schedule 15 of the Act shall apply to your interest in the land referred to in the attached Schedule.

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Dated: 24 February 2022

High Speed Two (HS2) Limited

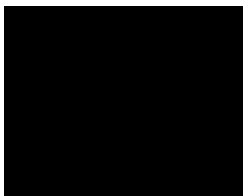
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

Notice No. N-308916

SCHEDULE

Borough of Stafford

(1) Plot No.	(2) Description
122980	7532.65 square metres, or thereabouts, of woodland and ponds (Stabhill Plantation)
122981	6509.22 square metres, or thereabouts, of woodland, pond and access tracks (Stabhill Plantation)
122982	4664.90 square metres, or thereabouts, of agricultural land, woodland and access track carrying public bridleway (Swynnerton 54), (Top Lane)
122983	52178.63 square metres, or thereabouts, of agricultural land, hedgerows and pond (Bottom Lane)
122984	14372.70 square metres, or thereabouts, of woodland (Cash's Pit)
124597	388.16 square metres, or thereabouts, of woodland (Stone Road)
124599	76.01 square metres, or thereabouts, of garden (2 Clifford Wood Bungalow)
124600	967.70 square metres, or thereabouts, of agricultural land (Stone Road)
124601	594.54 square metres, or thereabouts, of verge and access splay (Stone Road)



Please read this letter. It affects your property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308918

Dear 

Land: as per the enclosed schedule and plan

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021 – notice of temporary possession

The new high speed rail line between the West Midlands and Crewe, known as High Speed Two (HS2) Phase 2a, received Parliamentary approval on 11 February 2021. This follows initial investigation works which started in 2020, as part of the preparation for constructing HS2 Phase 2a.

I am writing to you today because, as you may be aware, your land and/or property has been identified as being required on a temporary basis during the construction of HS2 Phase 2a. I understand that this may be distressing news and I want to reassure you that my team are here to help you through the process and answer any questions you may have.

You can contact our HS2 Helpdesk all day every day on the details at the end of this letter.

What do I need to know?

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We are committed to ensuring our works are conducted in a professional manner and completed to a good standard. We and our contractors are required to leave your land within one year of the completion of the project works carried out on your land.

Will you restore my land once you have finished your works?

Yes, we must restore the land, and this will be agreed with the owners of the land and the relevant planning authority. In the event that agreement cannot be reached between those parties, the decision will be made by the appropriate Ministers of State.

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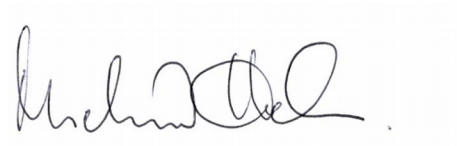
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Dated: 24 February 2022

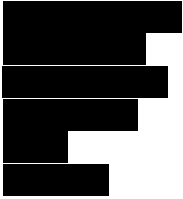
Yours sincerely,



Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited

enc. Notice



Please read this letter. It affects your land or property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308918

Dear 

Confirmation of Health and Safety matters on your land or property

Reference Land: as per the enclosed notice schedule and plan

As HS2 Ltd begins work on Phase 2a of the new railway between the West Midlands and Crewe, we are writing to you to ask some questions about your land or property.

Our team consider health and safety to be our top priority and we wish to protect anyone who may be on or near our sites, including the local community and the individuals that are involved in the construction of the High Speed Two Project.

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Please provide any information that you may have in relation to the following issues:

Notice No. N-308918		
Are you aware of the presence of asbestos, contaminated land or hazardous substances on the land/property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are architectural drawings / design plans available relating to structures on the property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information regarding the presence of installed plant or equipment on site, <i>e.g. electrical sub-stations, lifts or fixed air conditioning systems?</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to underground, surface or overhead utilities including gas, electrical or water services?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to environmental risks including any Environmental Agency permits or protections relating to the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to previous land use risks, fly tipping or invasive plants?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any other information relating to safety, health or environmental risks associated with the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Is any part of the land/property known to be derelict or in poor condition, and if so what is the extent and nature of the damage? Are any areas unsafe for access?		
<i>If yes to any of the above please provide further information here:</i>		
Are you aware of any other health and safety risks on the land and/or property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<i>If yes to the above please provide further information here:</i>		

We will share this information with organisations working on HS2 Ltd's behalf to minimise the risk of injury, health impacts and wider environmental concerns.

Thank you for your support in this matter.

Yours sincerely,



Mike Hickson OBE
Director of Land & Property
High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

NOTICE OF TEMPORARY POSSESSION OF LAND

To:



Notice No. N-308918

By virtue of Section 13 and Paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 of the High Speed Rail (West Midlands - Crewe) Act 2021 ("the Act") **I HEREBY GIVE YOU NOTICE** that **High Speed Two (HS2) Limited** (HS2 Ltd) as the Nominated Undertaker appointed by the Secretary of State for Transport pursuant to Section 41 of the Act will enter upon and take possession of the land described in the Schedule hereto and shown coloured green or coloured green and hatched over on the plan(s) annexed hereto after the period of **28 days** from the date of service of this notice, for any works or other Phase 2a purpose as is authorised by Schedule 15 of the Act.

You are served with this notice in accordance with paragraph 4(1) of Part 1 of Schedule 15 to the Act, pursuant to which the provisions of Section 13 and Schedule 15 of the Act shall apply to your interest in the land referred to in the attached Schedule.

In accordance with Schedule 15 of the Act, the Nominated Undertaker may, in connection with the construction of the works authorised by the Act, enter upon and take temporary possession of the land. The Nominated Undertaker must give not less than 28 days' notice of its intention to enter and take possession of the land. The Nominated Undertaker may not remain in possession of the land for longer than one year after the completion of the works unless the owner agrees to a longer period or, unless the provisions of Paragraph 4(3) of Schedule 15 apply, and within that period powers are exercised under the Act to serve a notice to treat or execute a General Vesting Declaration over the land.

Under paragraphs 8(1) and 9(1) of Part 3 of Schedule 15 to the Act, all private and general rights over land of which HS2 Ltd takes possession under paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 are suspended and unenforceable for as long as HS2 Ltd remains in lawful possession of the land. Under paragraph 8(2) and 9(2) of Part 3 of Schedule 15, HS2 Ltd may, in relation to a private or general right, direct that paragraph 8(1) or 9(1) does not apply to the right, or that it applies to the right only to the extent specified in that direction. Any directions made under paragraphs 8(1) or 9(1) appear in the Schedule

hereto and shall be effective from the date of this Notice. The Nominated Undertaker may make further directions (including revoking or amending existing directions) after the date of this Notice or confer such rights on the landowner or other parties as it may specify in the Schedule hereto during the period for which the land is subject to temporary possession.

In the event that the Nominated Undertaker is refused the possession required under this notice it has the power to issue a warrant to the High Court Enforcement Officer to enforce these rights. The High Court Enforcement Officer will be able to enter the property to secure possession.

Paragraph 4(4) of Part 1 of Schedule 15 provides that compensation must be paid by the Nominated Undertaker to the owners and occupiers of land over which temporary possession is taken by virtue of paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 for any loss which is suffered by reason of the temporary occupation of the land.

Dated: 24 February 2022

High Speed Two (HS2) Limited

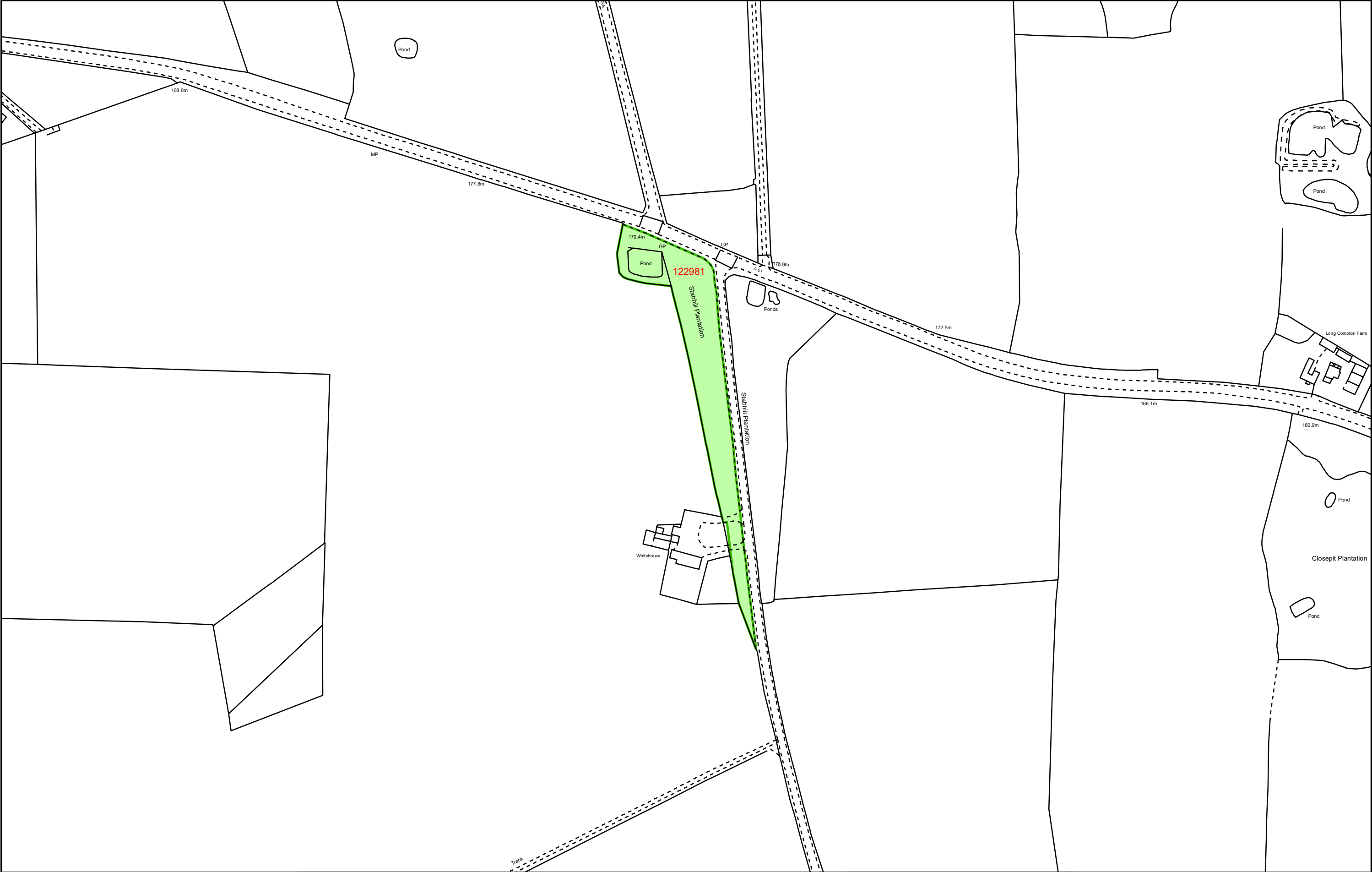
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

Notice No. N-308918

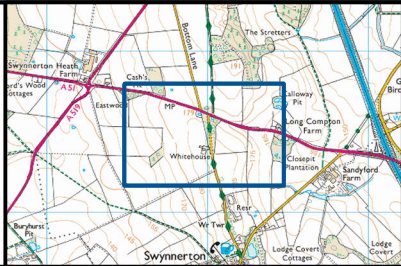
SCHEDULE

Borough of Stafford

(1) Plot No.	(2) Description
122981	6509.22 square metres, or thereabouts, of woodland, pond and access tracks (Stabhill Plantation)



Land Subject to Temporary Possession (Exclusive)



0.1	18/02/22	N-308918		AW	BL	AA			
Rev	Date	Description		By	Ckd	App			

Temporary Possession Plan
Notice Number: N-308918
LAA ID: A104_840

Centre point: 384,979, 336,483

District/Borough:
Borough of Stafford

HS2

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

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in part or issued incomplete in any way.

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Doc Number: P2A-HS2-GI-TEM-A000-000009

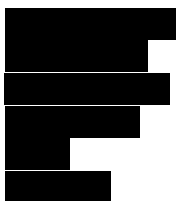
Scale at A3: 1:2,500

020406080

Metres

C354

Date: 18/02/22



Please read this letter. It affects your property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308919

Dear 

Land: as per the enclosed schedule and plan

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021 – notice of temporary possession

The new high speed rail line between the West Midlands and Crewe, known as High Speed Two (HS2) Phase 2a, received Parliamentary approval on 11 February 2021. This follows initial investigation works which started in 2020, as part of the preparation for constructing HS2 Phase 2a.

I am writing to you today because, as you may be aware, your land and/or property has been identified as being required on a temporary basis during the construction of HS2 Phase 2a. I understand that this may be distressing news and I want to reassure you that my team are here to help you through the process and answer any questions you may have.

You can contact our HS2 Helpdesk all day every day on the details at the end of this letter.

What do I need to know?

Attached is a formal legal notice which authorises High Speed Two (HS2) Limited (HS2 Ltd) (on behalf of the Secretary of State for Transport) to take temporary possession of your land and/or property for the project. I also enclose a plan of your land and/or property, shown in green.

We are committed to ensuring our works are conducted in a professional manner and completed to a good standard. We and our contractors are required to leave your land within one year of the completion of the project works carried out on your land.

Will you restore my land once you have finished your works?

Yes, we must restore the land, and this will be agreed with the owners of the land and the relevant planning authority. In the event that agreement cannot be reached between those parties, the decision will be made by the appropriate Ministers of State.

Will I receive compensation?

You may be entitled to compensation for any loss you may experience from HS2's temporary possession of your land and/or property. We recommend you appoint professional advisors in respect of any compensation claim, the reasonable costs of any successful claim will be paid by HS2 Ltd. To make a claim, write in the first instance to Land and Property Compensation Claims, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.

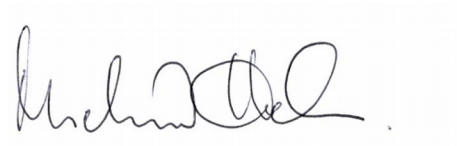
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes of free professional advice.

What happens now?

One of our property advisors will be in contact with you to discuss what this means for you, however in the meantime, if you have any questions regarding the above or about the proposals for HS2, please contact our HS2 Helpdesk on freephone 08081 434 434 or at hs2enquiries@hs2.org.uk.

Dated: 24 February 2022

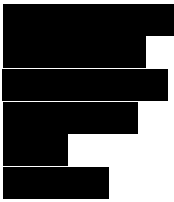
Yours sincerely,



Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited

enc. Notice



Please read this letter. It affects your land or property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308919

Dear 

Confirmation of Health and Safety matters on your land or property

Reference Land: as per the enclosed notice schedule and plan

As HS2 Ltd begins work on Phase 2a of the new railway between the West Midlands and Crewe, we are writing to you to ask some questions about your land or property.

Our team consider health and safety to be our top priority and we wish to protect anyone who may be on or near our sites, including the local community and the individuals that are involved in the construction of the High Speed Two Project.

We would therefore like to request from you any information you have relating to risks or health and safety matters relating to the land/property identified in the attached notice.

Please provide any information that you have in relation to the questions asked below, as well as anything else that you consider to be relevant.

Please return this page along with the following completed page back to HS2 Ltd within 14 days of receiving it.

You can do this by:

- Emailing a scanned copy of the completed pages to lpdutyofcare@hs2.org.uk
- Or by posting to the document or a copy to: *Land and Property Duty of Care, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA.*

If you need any further assistance, please contact our HS2 Helpdesk at any time on freephone 08081 434 434 or by emailing hs2enquiries@hs2.org.uk.

Please provide any information that you may have in relation to the following issues:

Notice No. N-308919		
Are you aware of the presence of asbestos, contaminated land or hazardous substances on the land/property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are architectural drawings / design plans available relating to structures on the property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information regarding the presence of installed plant or equipment on site, <i>e.g. electrical sub-stations, lifts or fixed air conditioning systems?</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to underground, surface or overhead utilities including gas, electrical or water services?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to environmental risks including any Environmental Agency permits or protections relating to the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to previous land use risks, fly tipping or invasive plants?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any other information relating to safety, health or environmental risks associated with the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Is any part of the land/property known to be derelict or in poor condition, and if so what is the extent and nature of the damage? Are any areas unsafe for access?		
<i>If yes to any of the above please provide further information here:</i>		
Are you aware of any other health and safety risks on the land and/or property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<i>If yes to the above please provide further information here:</i>		

We will share this information with organisations working on HS2 Ltd's behalf to minimise the risk of injury, health impacts and wider environmental concerns.

Thank you for your support in this matter.

Yours sincerely,

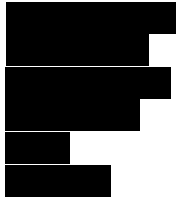


Mike Hickson OBE
Director of Land & Property
High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

NOTICE OF TEMPORARY POSSESSION OF LAND

To:



Notice No. N-308919

By virtue of Section 13 and Paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 of the High Speed Rail (West Midlands - Crewe) Act 2021 ("the Act") **I HEREBY GIVE YOU NOTICE** that **High Speed Two (HS2) Limited** (HS2 Ltd) as the Nominated Undertaker appointed by the Secretary of State for Transport pursuant to Section 41 of the Act will enter upon and take possession of the land described in the Schedule hereto and shown coloured green or coloured green and hatched over on the plan(s) annexed hereto after the period of **28 days** from the date of service of this notice, for any works or other Phase 2a purpose as is authorised by Schedule 15 of the Act.

You are served with this notice in accordance with paragraph 4(1) of Part 1 of Schedule 15 to the Act, pursuant to which the provisions of Section 13 and Schedule 15 of the Act shall apply to your interest in the land referred to in the attached Schedule.

In accordance with Schedule 15 of the Act, the Nominated Undertaker may, in connection with the construction of the works authorised by the Act, enter upon and take temporary possession of the land. The Nominated Undertaker must give not less than 28 days' notice of its intention to enter and take possession of the land. The Nominated Undertaker may not remain in possession of the land for longer than one year after the completion of the works unless the owner agrees to a longer period or, unless the provisions of Paragraph 4(3) of Schedule 15 apply, and within that period powers are exercised under the Act to serve a notice to treat or execute a General Vesting Declaration over the land.

Under paragraphs 8(1) and 9(1) of Part 3 of Schedule 15 to the Act, all private and general rights over land of which HS2 Ltd takes possession under paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 are suspended and unenforceable for as long as HS2 Ltd remains in lawful possession of the land. Under paragraph 8(2) and 9(2) of Part 3 of Schedule 15, HS2 Ltd may, in relation to a private or general right, direct that paragraph 8(1) or 9(1) does not apply to the right, or that it applies to the right only to the extent specified in that direction. Any directions made under paragraphs 8(1) or 9(1) appear in the Schedule

hereto and shall be effective from the date of this Notice. The Nominated Undertaker may make further directions (including revoking or amending existing directions) after the date of this Notice or confer such rights on the landowner or other parties as it may specify in the Schedule hereto during the period for which the land is subject to temporary possession.

In the event that the Nominated Undertaker is refused the possession required under this notice it has the power to issue a warrant to the High Court Enforcement Officer to enforce these rights. The High Court Enforcement Officer will be able to enter the property to secure possession.

Paragraph 4(4) of Part 1 of Schedule 15 provides that compensation must be paid by the Nominated Undertaker to the owners and occupiers of land over which temporary possession is taken by virtue of paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 for any loss which is suffered by reason of the temporary occupation of the land.

Dated: 24 February 2022

High Speed Two (HS2) Limited

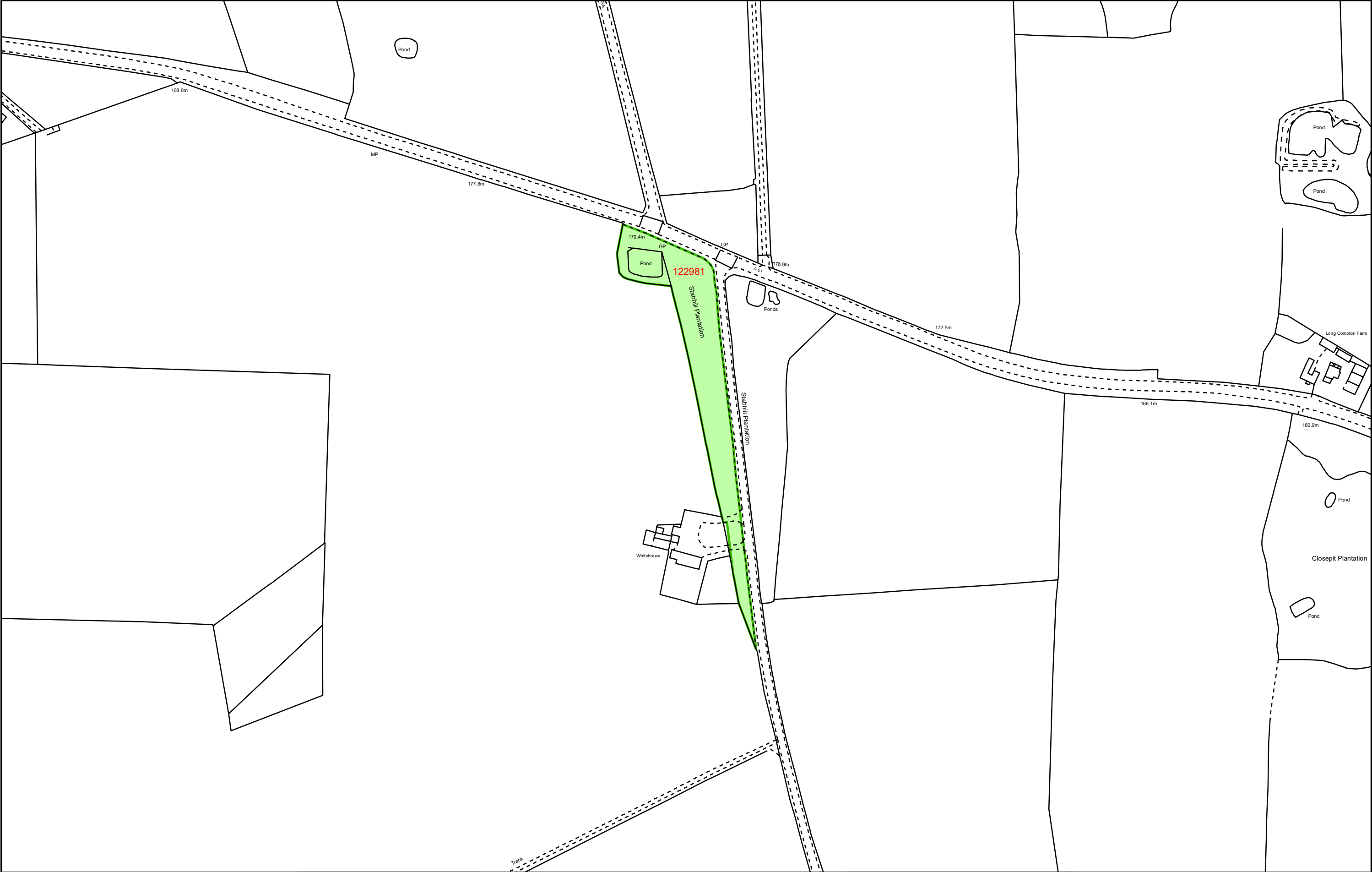
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

Notice No. N-308919

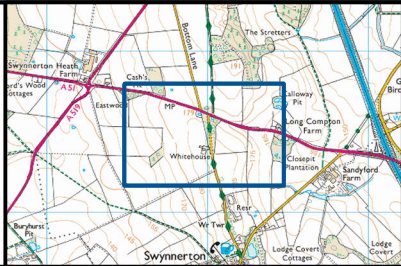
SCHEDULE

Borough of Stafford

(1) Plot No.	(2) Description
122981	6509.22 square metres, or thereabouts, of woodland, pond and access tracks (Stabhill Plantation)



Land Subject to Temporary Possession (Exclusive)



0.1	18/02/22	N-308919		AW	BL	AA			
Rev	Date	Description		By	Ckd	App			

Temporary Possession Plan
Notice Number: N-308919
LAA ID: A104_840
Centre point: 384,979, 336,483

District/Borough:
Borough of Stafford

HS2

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

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Doc Number: P2A-HS2-GI-TEM-A000-000009

Scale at A3: 1:2,500

0

20

40

60

80

Metres

C362

Date: 18/02/22

N



Please read this letter. It affects your property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308920

Dear 

Land: as per the enclosed schedule and plan

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021 – notice of temporary possession

The new high speed rail line between the West Midlands and Crewe, known as High Speed Two (HS2) Phase 2a, received Parliamentary approval on 11 February 2021. This follows initial investigation works which started in 2020, as part of the preparation for constructing HS2 Phase 2a.

I am writing to you today because, as you may be aware, your land and/or property has been identified as being required on a temporary basis during the construction of HS2 Phase 2a. I understand that this may be distressing news and I want to reassure you that my team are here to help you through the process and answer any questions you may have.

You can contact our HS2 Helpdesk all day every day on the details at the end of this letter.

What do I need to know?

Attached is a formal legal notice which authorises High Speed Two (HS2) Limited (HS2 Ltd) (on behalf of the Secretary of State for Transport) to take temporary possession of your land and/or property for the project. I also enclose a plan of your land and/or property, shown in green.

We are committed to ensuring our works are conducted in a professional manner and completed to a good standard. We and our contractors are required to leave your land within one year of the completion of the project works carried out on your land.

Will you restore my land once you have finished your works?

Yes, we must restore the land, and this will be agreed with the owners of the land and the relevant planning authority. In the event that agreement cannot be reached between those parties, the decision will be made by the appropriate Ministers of State.

Will I receive compensation?

You may be entitled to compensation for any loss you may experience from HS2's temporary possession of your land and/or property. We recommend you appoint professional advisors in respect of any compensation claim, the reasonable costs of any successful claim will be paid by HS2 Ltd. To make a claim, write in the first instance to Land and Property Compensation Claims, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.

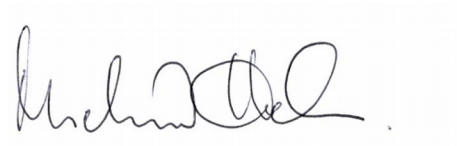
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes of free professional advice.

What happens now?

One of our property advisors will be in contact with you to discuss what this means for you, however in the meantime, if you have any questions regarding the above or about the proposals for HS2, please contact our HS2 Helpdesk on freephone 08081 434 434 or at hs2enquiries@hs2.org.uk.

Dated: 24 February 2022

Yours sincerely,



Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited

enc. Notice



Please read this letter. It affects your land or property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308920

Dear [REDACTED]

Confirmation of Health and Safety matters on your land or property

Reference Land: as per the enclosed notice schedule and plan

As HS2 Ltd begins work on Phase 2a of the new railway between the West Midlands and Crewe, we are writing to you to ask some questions about your land or property.

Our team consider health and safety to be our top priority and we wish to protect anyone who may be on or near our sites, including the local community and the individuals that are involved in the construction of the High Speed Two Project.

We would therefore like to request from you any information you have relating to risks or health and safety matters relating to the land/property identified in the attached notice.

Please provide any information that you have in relation to the questions asked below, as well as anything else that you consider to be relevant.

Please return this page along with the following completed page back to HS2 Ltd within 14 days of receiving it.

You can do this by:

- Emailing a scanned copy of the completed pages to lpdutyofcare@hs2.org.uk
- Or by posting to the document or a copy to: *Land and Property Duty of Care, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA.*

If you need any further assistance, please contact our HS2 Helpdesk at any time on freephone 08081 434 434 or by emailing hs2enquiries@hs2.org.uk.

Please provide any information that you may have in relation to the following issues:

Notice No. N-308920		
Are you aware of the presence of asbestos, contaminated land or hazardous substances on the land/property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are architectural drawings / design plans available relating to structures on the property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information regarding the presence of installed plant or equipment on site, <i>e.g. electrical sub-stations, lifts or fixed air conditioning systems?</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to underground, surface or overhead utilities including gas, electrical or water services?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to environmental risks including any Environmental Agency permits or protections relating to the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to previous land use risks, fly tipping or invasive plants?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any other information relating to safety, health or environmental risks associated with the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Is any part of the land/property known to be derelict or in poor condition, and if so what is the extent and nature of the damage? Are any areas unsafe for access?		
<i>If yes to any of the above please provide further information here:</i>		
Are you aware of any other health and safety risks on the land and/or property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<i>If yes to the above please provide further information here:</i>		

We will share this information with organisations working on HS2 Ltd's behalf to minimise the risk of injury, health impacts and wider environmental concerns.

Thank you for your support in this matter.

Yours sincerely,



Mike Hickson OBE
Director of Land & Property
High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

NOTICE OF TEMPORARY POSSESSION OF LAND

To:

Notice No. N-308920



By virtue of Section 13 and Paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 of the High Speed Rail (West Midlands - Crewe) Act 2021 ("the Act") **I HEREBY GIVE YOU NOTICE** that **High Speed Two (HS2) Limited** (HS2 Ltd) as the Nominated Undertaker appointed by the Secretary of State for Transport pursuant to Section 41 of the Act will enter upon and take possession of the land described in the Schedule hereto and shown coloured green or coloured green and hatched over on the plan(s) annexed hereto after the period of **28 days** from the date of service of this notice, for any works or other Phase 2a purpose as is authorised by Schedule 15 of the Act.

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Under paragraphs 8(1) and 9(1) of Part 3 of Schedule 15 to the Act, all private and general rights over land of which HS2 Ltd takes possession under paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 are suspended and unenforceable for as long as HS2 Ltd remains in lawful possession of the land. Under paragraph 8(2) and 9(2) of Part 3 of Schedule 15, HS2 Ltd may, in relation to a private or general right, direct that paragraph 8(1) or 9(1) does not apply to the right, or that it applies to the right only to the extent specified in that direction. Any directions made under paragraphs 8(1) or 9(1) appear in the Schedule

hereto and shall be effective from the date of this Notice. The Nominated Undertaker may make further directions (including revoking or amending existing directions) after the date of this Notice or confer such rights on the landowner or other parties as it may specify in the Schedule hereto during the period for which the land is subject to temporary possession.

In the event that the Nominated Undertaker is refused the possession required under this notice it has the power to issue a warrant to the High Court Enforcement Officer to enforce these rights. The High Court Enforcement Officer will be able to enter the property to secure possession.

Paragraph 4(4) of Part 1 of Schedule 15 provides that compensation must be paid by the Nominated Undertaker to the owners and occupiers of land over which temporary possession is taken by virtue of paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 for any loss which is suffered by reason of the temporary occupation of the land.

Dated: 24 February 2022

High Speed Two (HS2) Limited

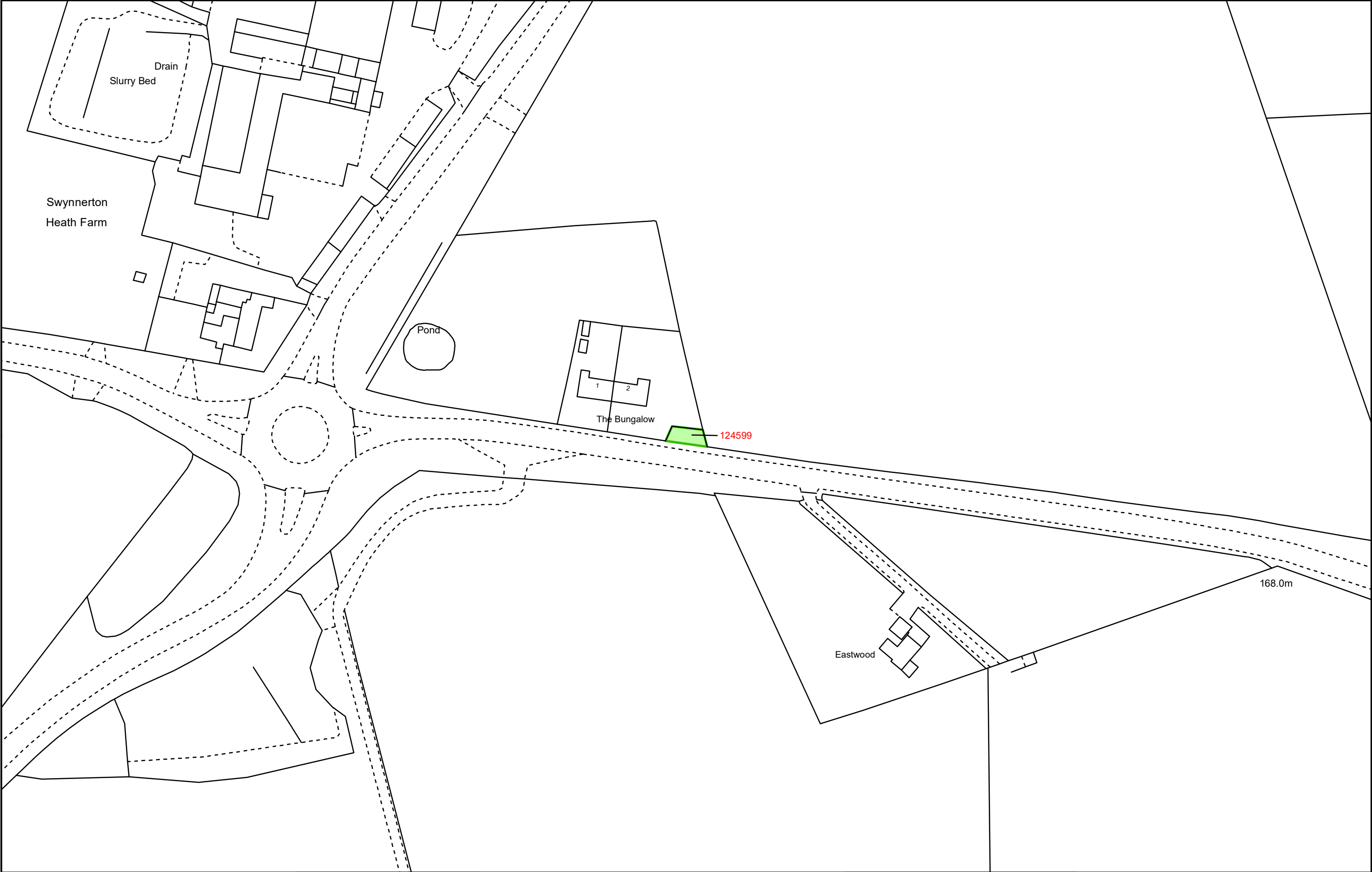
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021


Notice No. N-308920

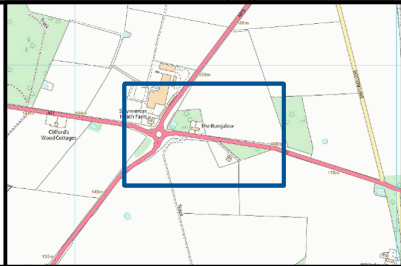
SCHEDULE

Borough of Stafford

(1) Plot No.	(2) Description
124599	76.01 square metres, or thereabouts, of garden (2 Clifford Wood Bungalow)



 Land Subject to Temporary Possession (Exclusive)




0.1	18/02/22	N-308920	AW	BL	AA	
Rev	Date	Description	By	Ckd	App	

Temporary Possession Plan
Notice Number: N-308920
LAA ID: A104_840


Centre point: 384,400, 336,786

District/Borough:

Borough of Stafford




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



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Scale at A3: 1:1,250

Date: 18/02/22

C370

Notice Information			Party Information			Delivery Information	
Notice Number	Notice Date	Document Reference (eB ref)	Party ID	Party Name	Party Address	Date of Service	Method of Service
N-308914	24/02/2022	2LR01-MMD-LP-LPN-A000-308914	P40005	Severn Trent Water Limited		24/02/2022	First Class Signed For
N-308915	24/02/2022	2LR01-MMD-LP-LPN-A000-308915	P40024	Staffordshire County Council		24/02/2022	First Class Signed For
N-308916	24/02/2022	2LR01-MMD-LP-LPN-A000-308916	P103983			24/02/2022	First Class Signed For
N-308917	24/02/2022	2LR01-MMD-LP-LPN-A000-308917	P103978	Orbel Agriculture Limited		24/02/2022	First Class Signed For
N-308918	24/02/2022	2LR01-MMD-LP-LPN-A000-308918	P104000			24/02/2022	First Class Signed For
N-308919	24/02/2022	2LR01-MMD-LP-LPN-A000-308919	P104001			24/02/2022	First Class Signed For
N-308920	24/02/2022	2LR01-MMD-LP-LPN-A000-308920	P104005			24/02/2022	First Class Signed For
N-308921	24/02/2022	2LR01-MMD-LP-LPN-A000-308921	P124161			24/02/2022	First Class Signed For

Sent on 24/02/2022

S. Quitmann

Delivered By

Tracked

LBT Signature

24

Royal Mail

Postage on Account GB

L52

E12

Parcel

300g

32-049 138 4000-36C BB3 B30





QU 0080 3059 5GB

Severn Trent Water Limited



Return Address
High Speed Two (H
S2) Ltd
Two Snowhill
Snow Hill
Birmingham
B4 6GA

Customer Ref:
38747 / N-308914

HS2

Delivered By

Tracked

LBT Signature

24

Royal Mail

Postage on Account GB

L52

E12

Parcel

300g

32-049 138 4000-36C BB3 B4E





QU 0080 3060 4GB

Staffordshire County Council



Return Address
High Speed Two (H
S2) Ltd
Two Snowhill
Snow Hill
Birmingham
B4 6GA

Customer Ref:
38748 / N-308915

HS2

Delivered By

Tracked

LBT Signature

24

Royal Mail

Postage on Account GB

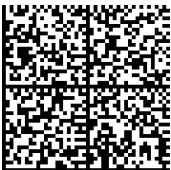
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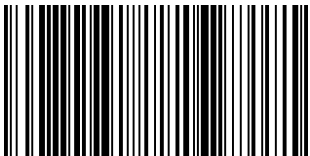
E11

Parcel


300g

32-049 138 4000-36C BB3 B60





QU 0080 3061 8GB



Return Address
High Speed Two (H
S2) Ltd
Two Snowhill
Snow Hill
Birmingham
B4 6GA

Customer Ref:
38749 / N-308916

HS2

Delivered By

Tracked

LBT Signature

24

Royal Mail

Postage on Account GB


L52

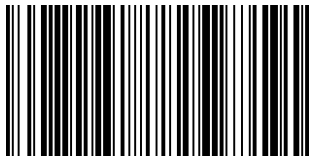
E11

Parcel


300g

32-049 138 4000-36C BB3 B93





QU 0080 3062 1GB



Return Address
High Speed Two (H
S2) Ltd
Two Snowhill
Snow Hill
Birmingham
B4 6GA

Customer Ref:
38750 / N-308917

HS2

Delivered By

Tracked

LBT Signature

24

Royal Mail

Postage on Account GB

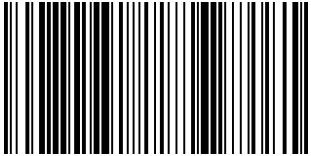
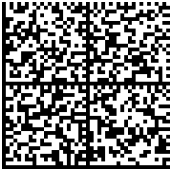
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E11

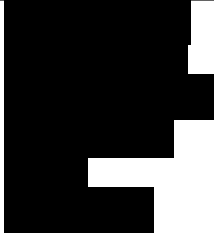
Parcel

300g

32-049 138 4000-36C BB3 BBF



QU 0080 3063 5GB



Return Address
High Speed Two (H
S2) Ltd
Two Snowhill
Snow Hill
Birmingham
B4 6GA

Customer Ref:
38751 / N-308918

HS2

Delivered By

Tracked

LBT Signature

24

Royal Mail

Postage on Account GB

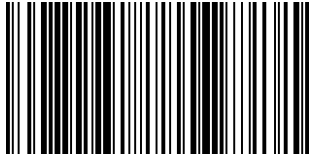

L52

E11

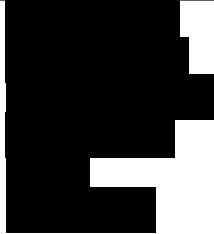
Parcel

300g

32-049 138 4000-36C BB3 BE8



QU 0080 3064 9GB



Return Address
High Speed Two (H
S2) Ltd
Two Snowhill
Snow Hill
Birmingham
B4 6GA

Customer Ref:
38752 / N-308919

HS2

Delivered By

Tracked

LBT Signature

24

Royal Mail

Postage on Account GB


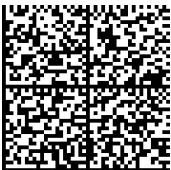
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E11

Parcel

300g

32-049 138 4000-36C BB3 C13



QU 0080 3065 2GB



Return Address
High Speed Two (H
S2) Ltd
Two Snowhill
Snow Hill
Birmingham
B4 6GA

Customer Ref:
38753 / N-308920

HS2

Delivered By

Tracked

LBT Signature

24

Royal Mail

Postage on Account GB


L52

E11

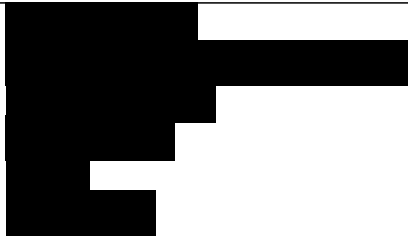
Parcel

300g

32-049 138 4000-36C BB3 C3F



QU 0080 3066 6GB



Return Address
High Speed Two (H
S2) Ltd
Two Snowhill
Snow Hill
Birmingham
B4 6GA

Customer Ref:
38754 / N-308921

HS2



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QU008030604GB

Service used:

Royal Mail Tracked 24™



Proof of delivery



Tracking Assistant



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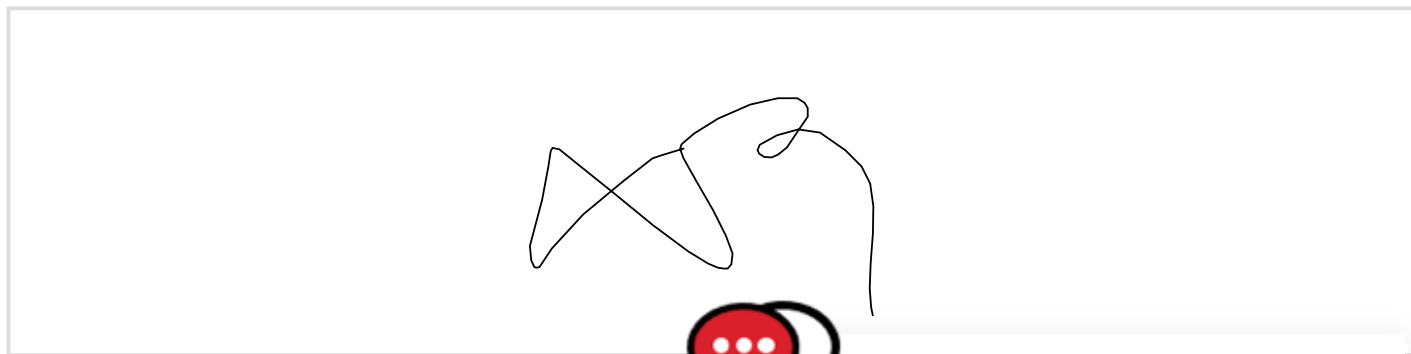
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Service used:

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Tracking Assistant



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Tracking number:

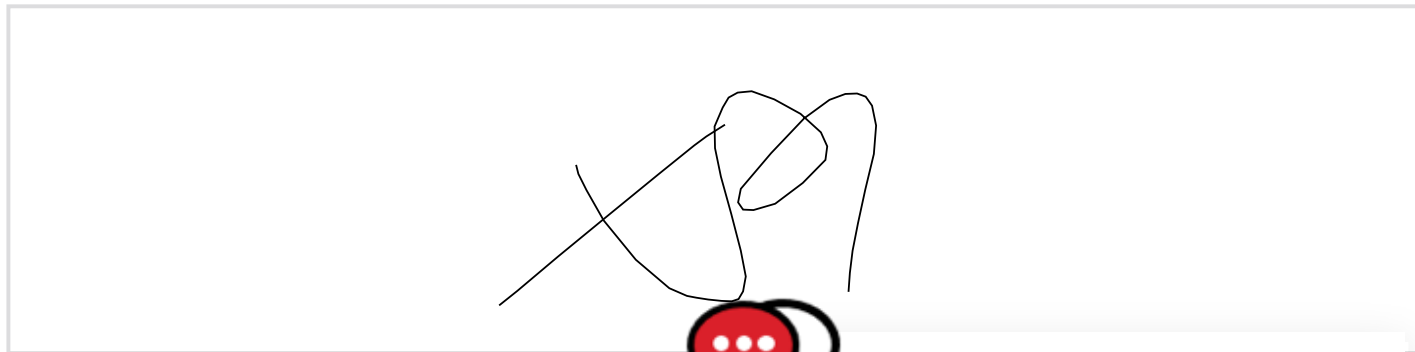
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Service used:

Royal Mail Tracked 24™



Proof of delivery



Tracking Assistant



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← [Track another item](#)

[Cymraeg](#)



Delivered

Your item was delivered on 25-02-2022.

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Tracking number:

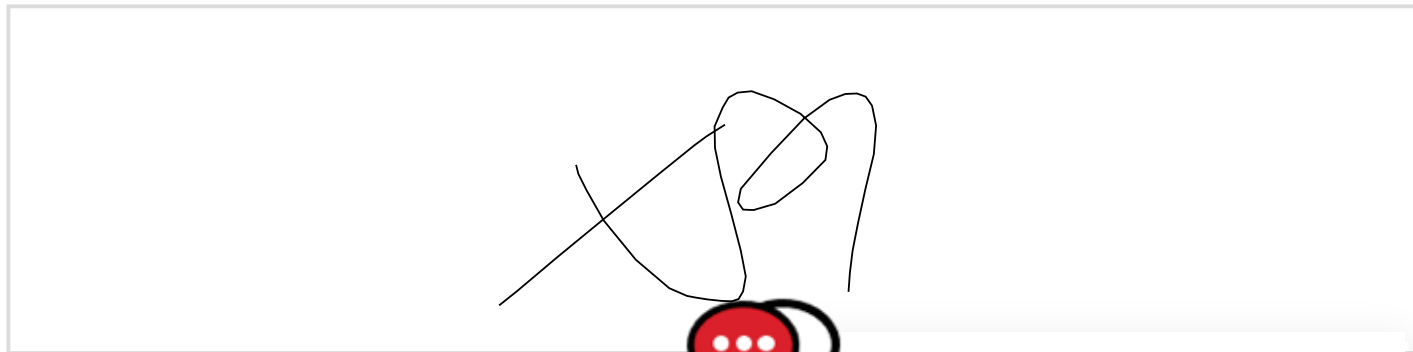
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Service used:

Royal Mail Tracked 24™



Proof of delivery



Tracking Assistant



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← [Track another item](#)

[Cymraeg](#)



Delivered

Your item was delivered on 25-02-2022.

Not the signature you expected? [Find out why](#).

Tracking number:

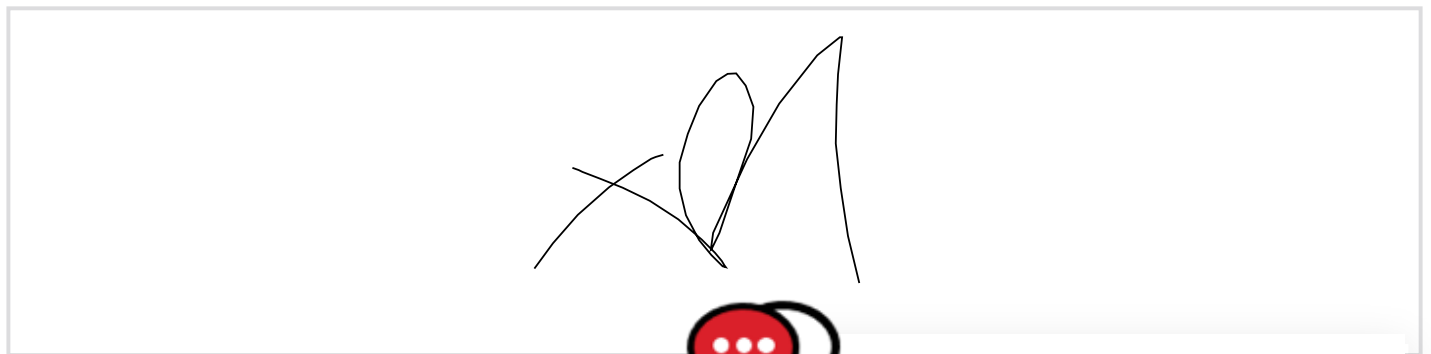
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Service used:

Royal Mail Tracked 24™



Proof of delivery



Tracking Assistant



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Click for [Service Updates](#).**

← [Track another item](#)

[Cymraeg](#)



Delivered

Your item was delivered on 25-02-2022.

Not the signature you expected? [Find out why](#).

Tracking number:

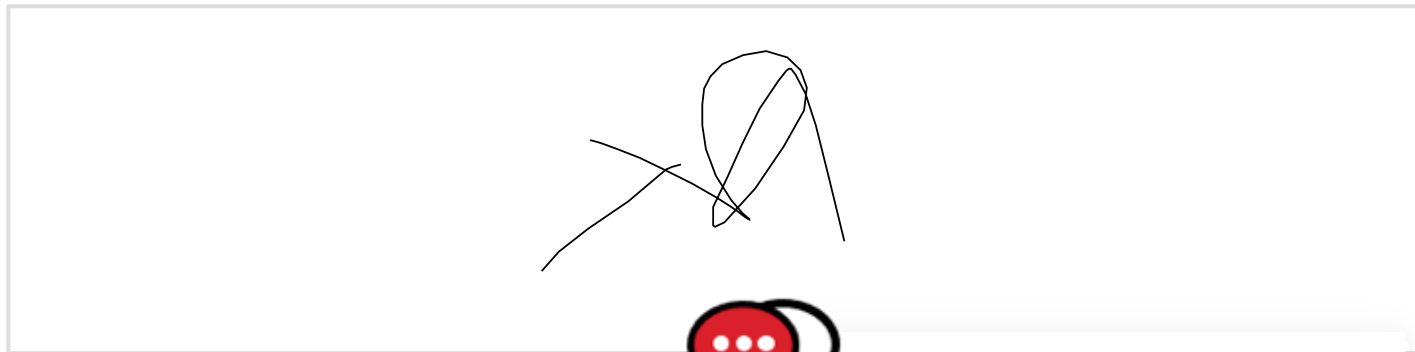
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Service used:

Royal Mail Tracked 24™



Proof of delivery



Tracking Assistant

On behalf of: The Claimants
Witness: D Asker
1st statement of witness
Exhibits: DA1
Dated: 25/02/2022

IN THE HIGH COURT OF JUSTICE Claim No.
CHANCERY DIVISION

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN AND OTHERS

Defendants

WITNESS STATEMENT OF DAVID ASKER

I, **DAVID ASKER**, Marine House, 2 Marine Road, Colwyn Bay, Conwy LL29 8PH, state as follows:

1. I am a process server instructed on behalf of the Claimants to serve documents on persons unknown in occupation of land adjacent to the A51 Stone Road at Cash's Pit, Swynnerton, Staffordshire (part of which is known as Bluebell Wood).
2. Unless otherwise stated, all facts and matters set out in this Witness Statement are from my own knowledge. I have identified those statements which are matters of information or belief, and identified the sources of the information or belief.
3. There are now shown and produced to me marked **DA1** true copies of documents to which I shall refer in this Witness Statement.

4. On 24th February 2022, I was instructed to serve printed notices at the ad-hoc encampment on the verge and wooded area adjacent to the A51 Stone Road at Cash's Pit, Swynnerton, Staffordshire and the approximate location of the entrance to which is shown marked with a red X on the plan at **page 1 of Exhibit DA1**. I attended this site at 12:12 hours.
5. Copies of documents I served (being a Notice to Vacate and Notice of temporary possession numbered N-308922) are at **pages 2 to 29 of Exhibit DA1**.
6. Service was affected as follows: I attended at the entrance to the ad-hoc encampment, where I placed in a lidded box clearly marked with the painted legend "Post Box" a copy of the Notice to Vacate and a copy of the Notice No: N-308922, each in a clear waterproof sleeve and each in an envelope addressed to All Unknown Occupiers, Verge and Woodland, Cash's Pit, Stone Road at 12:14 hours, as shown in the photographs at **pages 30 to 31 of Exhibit DA1**.
7. A young bearded male, who was identified to me as the person known as: "Jimmy Knaggs" by the HS2 security staff who had accompanied me, approached me and demanded to know my name and what I was doing, filming me on his mobile telephone and conducting a continuous commentary on my actions. I advised him that I was attending to deliver notices to vacate and copies of the notice N-308922 which related to the land upon which the encampment lay. I drew his attention to the notices in the post box, which he had seen me place there, and advised him that I would place a further 9 copies of these along the hedgeline at the verge with the A51 road, and would attach them in waterproof plastic sleeves to the ad-hoc structures which had been erected.
8. I then between 12:16 hours and 12:23 hours placed 9 further copies of the Notice to Vacate and Notice No: N-308922, each in a clear waterproof sleeve, securely affixed in pairs with a thick black nylon cable tie to visible points on the verge along the hawthorn hedge, affixed to the wooden ad-hoc structures forming a barrier to entry into the woodland area of the land and to trees where there was no suitable attachment point to hand. Photographs of some of the notices in situ are at **pages 32 to 37 of Exhibit DA1**.

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:..........

DAVID ASKER

Dated: 25 February 2022

On behalf of: The Claimants
Witness: D Asker
1st statement of witness
Exhibits: DA1
Dated: 25/02/2022

**IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION**

Claim No.

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN AND OTHERS

Defendants

**EXHIBIT DA1 TO THE
WITNESS STATEMENT OF DAVID ASKER**

NOTICE TO VACATE

TO WHOM IT MAY CONCERN

**YOU ARE TRESPASSING ON THIS LAND, PUTTING
YOUR OWN SAFETY AT RISK AND YOUR
PRESENCE IS PREVENTING THOSE ENTITLED TO
POSSESSION OF THE LAND FROM LAWFULLY
USING IT.**

**YOU ARE HEREBY REQUIRED to cease trespassing on
this land and to remove all items place in and / or upon the
land and to make good any damage caused
IMMEDIATELY.**

**If you do not cease trespassing, action will be taken to
recover possession from you, which may include Court
proceedings.**



All Unknown Occupiers
Verge and woodland
Cash's Pit
Stone Road

Please read this letter. It affects your property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308922

Dear All Unknown Occupiers

Land: as per the enclosed schedule and plan

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021 – notice of temporary possession

The new high speed rail line between the West Midlands and Crewe, known as High Speed Two (HS2) Phase 2a, received Parliamentary approval on 11 February 2021. This follows initial investigation works which started in 2020, as part of the preparation for constructing HS2 Phase 2a.

I am writing to you today because, as you may be aware, your land and/or property has been identified as being required on a temporary basis during the construction of HS2 Phase 2a. I understand that this may be distressing news and I want to reassure you that my team are here to help you through the process and answer any questions you may have.

You can contact our HS2 Helpdesk all day every day on the details at the end of this letter.

What do I need to know?

Attached is a formal legal notice which authorises High Speed Two (HS2) Limited (HS2 Ltd) (on behalf of the Secretary of State for Transport) to take temporary possession of your land and/or property for the project. I also enclose a plan of your land and/or property, shown in green.

We are committed to ensuring our works are conducted in a professional manner and completed to a good standard. We and our contractors are required to leave your land within one year of the completion of the project works carried out on your land.

Will you restore my land once you have finished your works?

Yes, we must restore the land, and this will be agreed with the owners of the land and the relevant planning authority. In the event that agreement cannot be reached between those parties, the decision will be made by the appropriate Ministers of State.

Will I receive compensation?

You may be entitled to compensation for any loss you may experience from HS2's temporary possession of your land and/or property. We recommend you appoint professional advisors in respect of any compensation claim, the reasonable costs of any successful claim will be paid by HS2 Ltd. To make a claim, write in the first instance to Land and Property Compensation Claims, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.

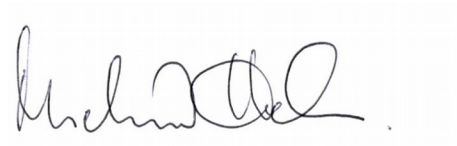
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes of free professional advice.

What happens now?

One of our property advisors will be in contact with you to discuss what this means for you, however in the meantime, if you have any questions regarding the above or about the proposals for HS2, please contact our HS2 Helpdesk on freephone 08081 434 434 or at hs2enquiries@hs2.org.uk.

Dated: 24 February 2022

Yours sincerely,



Mike Hickson OBE
Director of Land & Property

High Speed Two (HS2) Limited

enc. Notice

All Unknown Occupiers
Verge and woodland
Cash's Pit
Stone Road

Please read this letter. It affects your land or property.

Our Ref: 2LR01-MMD-LP-LPN-A000-308922

Dear All Unknown Occupiers

Confirmation of Health and Safety matters on your land or property

Reference Land: as per the enclosed notice schedule and plan

As HS2 Ltd begins work on Phase 2a of the new railway between the West Midlands and Crewe, we are writing to you to ask some questions about your land or property.

Our team consider health and safety to be our top priority and we wish to protect anyone who may be on or near our sites, including the local community and the individuals that are involved in the construction of the High Speed Two Project.

We would therefore like to request from you any information you have relating to risks or health and safety matters relating to the land/property identified in the attached notice.

Please provide any information that you have in relation to the questions asked below, as well as anything else that you consider to be relevant.

Please return this page along with the following completed page back to HS2 Ltd within 14 days of receiving it.

You can do this by:

- Emailing a scanned copy of the completed pages to lpdutyofcare@hs2.org.uk
- Or by posting to the document or a copy to: *Land and Property Duty of Care, High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA.*

If you need any further assistance, please contact our HS2 Helpdesk at any time on freephone 08081 434 434 or by emailing hs2enquiries@hs2.org.uk.


Please provide any information that you may have in relation to the following issues:

Notice No. N-308922		
Are you aware of the presence of asbestos, contaminated land or hazardous substances on the land/property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are architectural drawings / design plans available relating to structures on the property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information regarding the presence of installed plant or equipment on site, <i>e.g. electrical sub-stations, lifts or fixed air conditioning systems?</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to underground, surface or overhead utilities including gas, electrical or water services?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to environmental risks including any Environmental Agency permits or protections relating to the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any information relating to previous land use risks, fly tipping or invasive plants?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Are you aware of any other information relating to safety, health or environmental risks associated with the site?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Is any part of the land/property known to be derelict or in poor condition, and if so what is the extent and nature of the damage? Are any areas unsafe for access?		
<i>If yes to any of the above please provide further information here:</i>		
Are you aware of any other health and safety risks on the land and/or property?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<i>If yes to the above please provide further information here:</i>		

We will share this information with organisations working on HS2 Ltd's behalf to minimise the risk of injury, health impacts and wider environmental concerns.

Thank you for your support in this matter.

Yours sincerely,



Mike Hickson OBE
Director of Land & Property
High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

NOTICE OF TEMPORARY POSSESSION OF LAND

To:
All Unknown Occupiers
Verge and woodland
Cash's Pit
Stone Road

Notice No. N-308922

By virtue of Section 13 and Paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 of the High Speed Rail (West Midlands - Crewe) Act 2021 ("the Act") **I HEREBY GIVE YOU NOTICE** that **High Speed Two (HS2) Limited** (HS2 Ltd) as the Nominated Undertaker appointed by the Secretary of State for Transport pursuant to Section 41 of the Act will enter upon and take possession of the land described in the Schedule hereto and shown coloured green or coloured green and hatched over on the plan(s) annexed hereto after the period of **28 days** from the date of service of this notice, for any works or other Phase 2a purpose as is authorised by Schedule 15 of the Act.

You are served with this notice in accordance with paragraph 4(1) of Part 1 of Schedule 15 to the Act, pursuant to which the provisions of Section 13 and Schedule 15 of the Act shall apply to your interest in the land referred to in the attached Schedule.

In accordance with Schedule 15 of the Act, the Nominated Undertaker may, in connection with the construction of the works authorised by the Act, enter upon and take temporary possession of the land. The Nominated Undertaker must give not less than 28 days' notice of its intention to enter and take possession of the land. The Nominated Undertaker may not remain in possession of the land for longer than one year after the completion of the works unless the owner agrees to a longer period or, unless the provisions of Paragraph 4(3) of Schedule 15 apply, and within that period powers are exercised under the Act to serve a notice to treat or execute a General Vesting Declaration over the land.

Under paragraphs 8(1) and 9(1) of Part 3 of Schedule 15 to the Act, all private and general rights over land of which HS2 Ltd takes possession under paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 are suspended and unenforceable for as long as HS2 Ltd remains in lawful possession of the land. Under paragraph 8(2) and 9(2) of Part 3 of Schedule 15, HS2 Ltd may, in relation to a private or general right, direct that paragraph 8(1) or 9(1) does not apply to the right, or that it applies to the right only to the extent specified in that direction. Any directions made under paragraphs 8(1) or 9(1) appear in the Schedule

hereto and shall be effective from the date of this Notice. The Nominated Undertaker may make further directions (including revoking or amending existing directions) after the date of this Notice or confer such rights on the landowner or other parties as it may specify in the Schedule hereto during the period for which the land is subject to temporary possession.

In the event that the Nominated Undertaker is refused the possession required under this notice it has the power to issue a warrant to the High Court Enforcement Officer to enforce these rights. The High Court Enforcement Officer will be able to enter the property to secure possession.

Paragraph 4(4) of Part 1 of Schedule 15 provides that compensation must be paid by the Nominated Undertaker to the owners and occupiers of land over which temporary possession is taken by virtue of paragraphs 1(1) or 1(2) of Part 1 of Schedule 15 for any loss which is suffered by reason of the temporary occupation of the land.

Dated: 24 February 2022

High Speed Two (HS2) Limited

HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

Notice No. N-308922

SCHEDULE

Borough of Stafford

(1) Plot No.	(2) Description
122984	14372.70 square metres, or thereabouts, of woodland (Cash's Pit)
122985	3201.56 square metres, or thereabouts, of verge (Stone Road)

Notice: N-308922

Ref: A104_840

FORM OF CLAIM FOR COMPENSATION FOR THE ACQUISITION OR THE OCCUPATION OF LAND

For a claim for compensation for the compulsory acquisition of land and / or the taking of temporary possession and/or, when applying for an advance payment, whether in advance of or after possession is taken, in accordance with [section 52 of the Land Compensation Act 1973](#). Please note that the amendments made to Section 52 by the Housing and Planning Act 2016 apply to Compulsory Purchase Orders authorised from 6th April 2018.

This claim form is based on the Model Compensation Claim Form produced by the Ministry of Housing, Communities and Local Government (MHCLG). Please read the guidance notes for the Model Compensation Claim Form before completing this form. The notes can be found at <https://www.gov.uk/government/publications/compulsory-purchase-process-and-the-crichel-down-rules-guidance>.

Once completed, this form together with all accompanying plans, documents and evidence should be returned as soon as possible to:

LPclaims@hs2.org.uk

or

**Land and Property Compensation Claims
High Speed Two (HS2) Limited
Two Snowhill, Snow Hill Queensway, Birmingham, B46GA**

Explanatory notes

The plan attached to the Notice identifying the relevant authorisation for the compulsory acquisition of land shows the extent of the land to be acquired (or in respect of which temporary possession is to be taken) and in respect of which it is believed you have an interest.

If you wish to make a claim for compensation in respect of the land identified in the Notice/on the plan, you should answer the questions in this form and provide the requested documentation to support your claim for compensation.

If you do not have an interest in the whole of the land identified, please:

- 1) Mark on the attached plan (or on a copy) the extent of the land in which you hold an interest.
- 2) Ensure that you enclose:
a copy of your title plan(s) if you own the freehold, or,
a copy of the plan of your demise if you occupy under a lease, or,
a copy of a plan indicating the area of land you occupy if you occupy under some other arrangement.
- 3) Answer the questions in relation to the land that you own and/or occupy.

Where a request is being made for an Advance Payment of compensation for the compulsory acquisition of land, [section 52 of the Land Compensation Act 1973](#) requires that the request be accompanied by the information that **High Speed Two (HS2) Limited (HS2 Ltd) as Agent for and on behalf of the Secretary of State for Transport (the Acquiring Authority)** may reasonably require to estimate the amount of compensation due.

You should answer all questions relevant to your claim as fully and accurately as possible and provide copies of all documentation asked for in this form.

Where information is incomplete or unclear, HS2 Ltd may not be able to make a proper assessment of any Advance Payment of compensation to be paid to you; in which case HS2 Ltd will notify you of what extra information it needs.

Where any claimed amount has been estimated, this must be clearly indicated alongside the relevant amount.

1	Full name of claimant as stated on the registered title or lease (where one exists)	
2	Trading name (if different to 1 above)	
3	Have you instructed, or do you intend to instruct a solicitor, surveyor or other person to advise you, or do you intend to deal with this matter yourself	<input type="checkbox"/> Solicitor / <input type="checkbox"/> Surveyor / <input type="checkbox"/> Other / <input type="checkbox"/> Myself <i>(Select which applies)</i> If solicitor/surveyor/other go to 3a. If yourself, go to 3b
3a	Name of solicitor/surveyor/other for correspondence relating to this matter	Name of practice Postal address Contact name Email address Telephone
3b	Your address details for future correspondence relating to this matter	Postal address Email address Telephone
4	Do you have a mortgage or other loan arrangement for the purchase of your interest in the property which has an outstanding balance	<input type="checkbox"/> Yes / <input type="checkbox"/> No <i>(Select which applies)</i> If 'yes', go to 4a. If no, go to 5 NB: If you have reason to believe that the market value of the property will be insufficient to enable the present mortgage to be paid off in full, you must advise both your mortgage lender and HS2 Ltd as soon as possible.
4a	Name of lender Contact address of lender Lender's reference or Roll number Approximate balance outstanding	£
5	If you have an interest in other land either contiguous or adjacent to the land on the attached plan, please provide a plan identifying the additional land owned. Please confirm the interest you have in this adjacent land: Freehold/Leasehold <i>(Circle which applies)</i>	
6	Do you own the freehold or a leasehold interest in the land to be acquired	<input type="checkbox"/> Yes / <input type="checkbox"/> Neither <i>(Select which applies)</i> If you own the freehold, go to SECTION A and answer the questions there, then go to SECTION D . If you own a leasehold, go to SECTION B and answer the questions there, then go to SECTION D . If the answer is Neither, go to go to SECTION C and answer the questions there, then go to SECTION D . If you have any rights over land or restrictive covenants that will be

		<p>interfered with by the acquisition or temporary possession, go to SECTION E.</p> <p>If your land is subject to temporary possession, go to SECTION F.</p>
	SECTION A – FREEHOLD	
7	If you own the freehold interest	<p>Please provide your registered title number (if known).....</p> <p>If you do not know your registered title number, please provide a copy of your title and plan (available from your solicitor whose reasonable costs will be reimbursed in the event you are entitled to claim compensation) or by download from HM Land Registry if your title is Registered.</p> <p>Please include information regarding unregistered land and provide plan(s).</p>
8	If you own the freehold interest and have granted a right of occupation (such as a lease, tenancy or other arrangement) to anyone else	<p>Please provide a copy of any lease or other written agreement, whereby you have granted someone else occupation together with any related schedule of condition, memorandum relating to rent reviews, alterations etc.</p> <p>Please confirm the amount of any rent deposit you hold £.....</p> <p>Please confirm the amount of rent currently paid to you £.....</p> <p>Please provide a copy of any notice relating to the lease that you have served on your tenant, the effect of which notice is still outstanding (e.g. a break notice, notice under section 25 Landlord and Tenant Act 1954 etc.) and a copy of any notice served by your tenant on you (e.g. a break notice, notice under section 26 Landlord and Tenant Act 1954 etc).</p> <p>If there is no lease or agreement in writing, please provide a plan showing the area occupied by any third party and state:</p> <p>The name of the occupier and contact address (if different to above):</p> <p>Whether or not the land is shared with any other party; if so please provide contact details:</p> <p>The date the arrangement started:</p> <p>The current rent payable:</p> <p>The date the above rent became payable:</p> <p>The date the arrangement finishes.</p> <p>If there is a connection or relationship between you as freeholder and any occupier, other than through whatever arrangement that you have made, please provide details of the relationship etc</p>
9	Where the following is not stated on the copy of your freehold title that you have provided, please provide details of any of these, using a separate piece of paper	<p>i) Existing exceptions of mines and minerals and any other exceptions</p> <p>ii) Rights of the Lord of the Manor to minerals and sporting rights and other rights and names and addresses of the Lord and Steward (if the property was formerly Copyhold).</p> <p>iii) Any public or private rights of way or any other public or private rights or privileges affecting the property</p> <p>iv) Existing covenants and restrictions affecting the property</p> <p>v) Corn Rent payable</p> <p>vi) Liability to repair the Chancel of any Church</p> <p>vii) Land drainage rates payable</p> <p>viii) Yearly rent charges and outgoings</p>

10	Please provide particulars of: <ul style="list-style-type: none"> a) Any Notices by a public or local authority affecting the property b) Any statutory charges affecting the property e.g. under the Town and Country Planning Acts, the Private Street Works Acts or the Highways Act 1980 c) Works Acts or the Highways Act 1980 	
11	Please provide particulars of any outstanding right to compensation for refusal, conditional grant, revocation or modification of planning permission (Section 12 of the Land Compensation Act 1961)	
12	Please provide particulars of any un-implemented and/or partially implemented planning permission relating to the property Please consider if any planning applications relating to the property been made but not yet determined by the local planning authority	
SECTION B – LEASEHOLD		
13	If you own a leasehold interest	Please provide a copy of your lease and a colour copy of any lease plan.
14	If you have granted a right of occupation to anyone else by a sub-lease, licence or other arrangement.	Please provide a copy of any lease, or other written agreement, whereby you have granted someone else occupation. If there is no agreement in writing, please provide a plan showing the area let and state: The name of the occupier and contact address (if different to above): The date the arrangement started: The current rent payable: The date the above rent became payable: The date the arrangement finishes: If there is a connection or relationship between you as leaseholder and any occupier, other than through whatever arrangement that you have made, please provide details of the relationship etc
15	Please provide particulars of: <ul style="list-style-type: none"> a) Any Notices by a public or local authority affecting the property b) Any statutory charges affecting the property e.g. under the Town and Country Planning Acts, the Private Street Works Acts or the Highways Act 1980 	
16	Please provide particulars of any outstanding right to compensation for refusal, conditional grant, revocation or modification of planning permission (Section 12 of the Land Compensation Act 1961)	
17	Please provide particulars of any un-implemented and/or partially implemented planning permission relating to the property Please consider if any planning applications relating to the property been made but not yet determined by the local planning authority	

SECTION C – OTHER INTEREST																			
18	<p>If you neither own the freehold interest nor occupy under a lease or other written agreement</p> <p>On a separate piece of paper, please state in as much detail as possible the exact circumstances of your occupation and by what right you consider you are entitled to be in occupation of the land and property at this address</p> <p>If there is a connection or relationship between you as occupier and your landlord, other than through whatever arrangement that you have made, please provide details of the relationship etc</p>																		
SECTION D – ACQUISITION																			
19	<p>Is the claimant able to fully recover VAT: <input type="checkbox"/> Yes / <input type="checkbox"/> No (Select which applies)</p> <p>If 'No', can the claimant partially recover VAT: <input type="checkbox"/> Yes / <input type="checkbox"/> No (Select which applies)</p> <p>If 'Yes', please provide evidence (e.g. an accountant's certification) to show what percentage of VAT can be usually be recovered. If 'Yes' the claimant's VAT registration will be required</p>																		
20	<p>Will the sale of the interest in land be liable to VAT? <input type="checkbox"/> Yes / <input type="checkbox"/> No (Select which applies)</p> <p>If 'Yes', please provide a copy of HMRC acknowledgment of the option to tax</p>																		
21	<p>Particulars of claim:</p> <p>NB The law requires you to provide a fully detailed valuation. You should include full details of any comparable evidence relied upon in support of the valuation to support your compensation claim. Please attach this as a separate document but summarise the individual figures below</p> <table border="0"> <tr> <td>For the value of the claimant's interest</td> <td>£</td> </tr> <tr> <td>For severance/injurious affection of other land of the claimant</td> <td>£</td> </tr> <tr> <td>For disturbance (Please provide the detail requested at 22)</td> <td>£</td> </tr> <tr> <td>For easements etc</td> <td>£</td> </tr> <tr> <td>Home loss payment</td> <td>£</td> </tr> <tr> <td>Basic loss payment</td> <td>£</td> </tr> <tr> <td>Occupier loss payment</td> <td>£</td> </tr> <tr> <td> Total gross claim</td> <td> £</td> </tr> <tr> <td> What sum, if any, is to be deducted for betterment</td> <td> £</td> </tr> </table>	For the value of the claimant's interest	£	For severance/injurious affection of other land of the claimant	£	For disturbance (Please provide the detail requested at 22)	£	For easements etc	£	Home loss payment	£	Basic loss payment	£	Occupier loss payment	£	 Total gross claim	 £	 What sum, if any, is to be deducted for betterment	 £
For the value of the claimant's interest	£																		
For severance/injurious affection of other land of the claimant	£																		
For disturbance (Please provide the detail requested at 22)	£																		
For easements etc	£																		
Home loss payment	£																		
Basic loss payment	£																		
Occupier loss payment	£																		
 Total gross claim	 £																		
 What sum, if any, is to be deducted for betterment	 £																		
22	<p>If an amount for disturbance has been or is to be claimed, please provide:</p> <p>Copies of any available estimates/quotations/costs already incurred for removal or other costs associated with moving to alternative premises.</p> <p>In the case of a business where it is likely that the business will close down, copies of any available estimates/quotations for costs etc associated with closing the business down.</p> <p>In the case of a business where it is possible that a claim for loss of profit (of either a temporary or permanent nature) might be made at any time in the future, copies of the full accounts (including the detailed Profit and Loss pages) for the last 3 accounting years that have been filed for taxation purposes with HMRC</p>																		

23	If you are making a claim for compensation in respect of the compulsory acquisition of land and have not yet made an application for an Advance Payment of compensation, do you wish this claim to be accepted also as a formal request for an Advance Payment. <input type="checkbox"/> Yes / <input type="checkbox"/> No <i>(Select which applies)</i>
SECTION E – INTERFERENCE WITH RIGHTS OVER LAND ETC	
24	<p>If an amount for loss or injury/damage caused by interference with any right over land or any restrictive covenant has been or is to be claimed, please provide:</p> <p>Copies of any available estimates/quotations/costs already incurred or to be incurred.</p>
SECTION F – TEMPORARY POSSESSION	
25	<p>If an amount for loss or injury/damage caused by temporary possession has been or is to be claimed, please provide:</p> <p>Copies of any available estimates/quotations/costs already incurred or to be incurred.</p>

Date.....

Signed by or on behalf of the Claimant.....

If not signed by the Claimant, please state the capacity in which signed.....

Name and Address of Signatory *(if different to the answer at Q3a)*.....

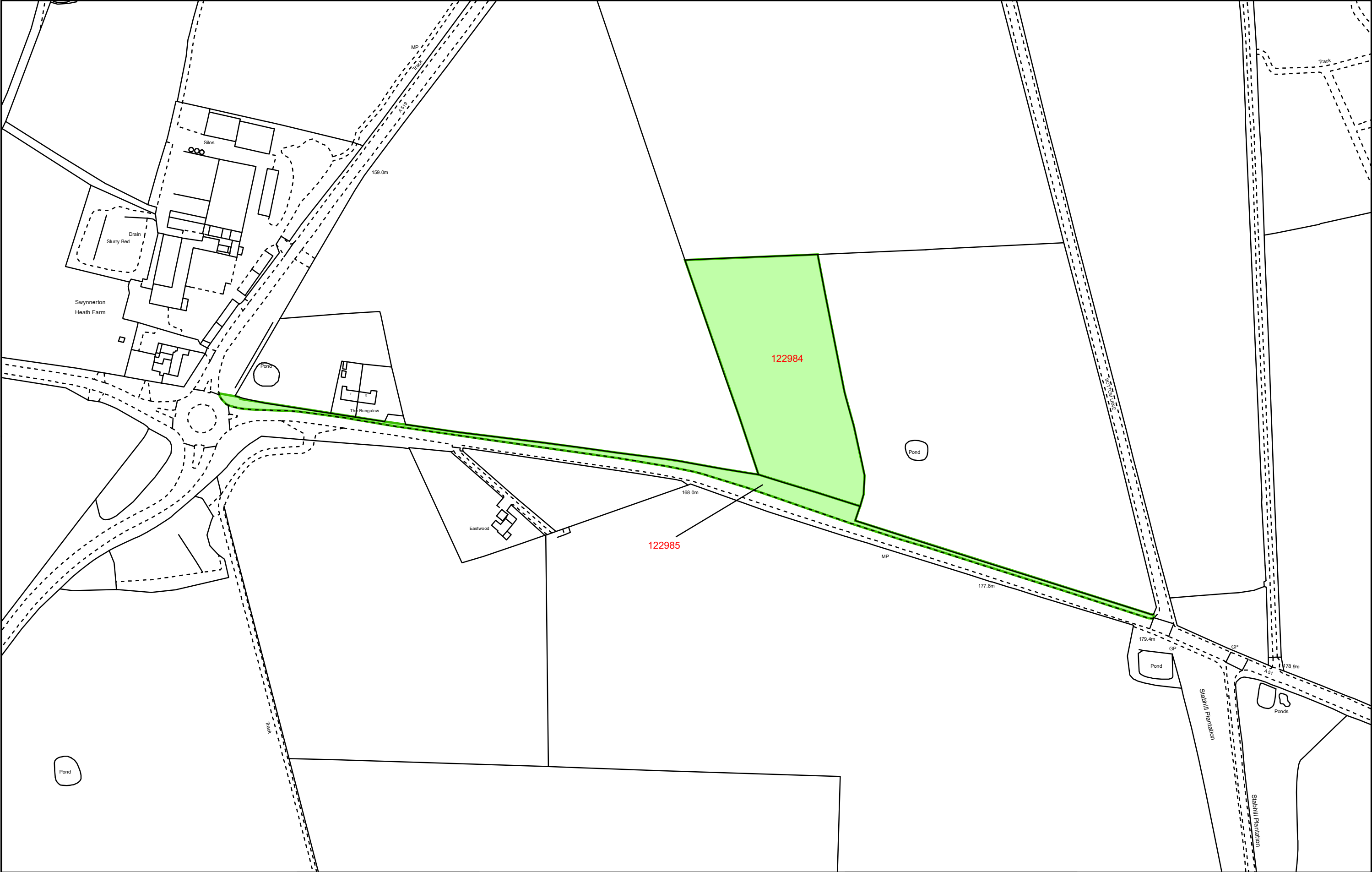
Please note:

Guidance on how to make a claim for compensation is available from:

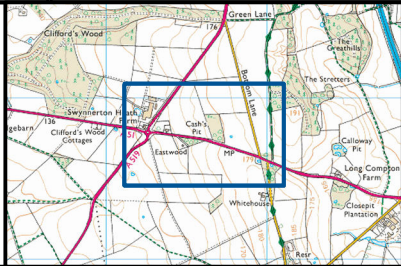
<https://www.hs2.org.uk/documents/collections/claiming-compensation-if-you-receive-a-notice/>

For the purpose of receiving an Advance Payment as much information as possible should be provided as to ensure that HS2 Ltd has every opportunity to make a proper assessment of the amount of any Advance Payment due.

If any required information is not available at the time this form is returned, please ensure that it is provided to HS2 Ltd as soon as it becomes available as a further Advance Payment of the compensation due may then be payable.



Land Subject to Temporary Possession (Exclusive)



0.1	22/02/22	N-308922	AW	BL	AA				
Rev	Date	Description	By	Ckd	App				

Temporary Possession Plan
Notice Number: N-308922
LAA ID: A104_840

Centre point: 384,610, 336,773

District/Borough:
Borough of Stafford

HS2

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Doc Number: P2A-HS2-GI-TEM-A000-000009

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

N

Scale at A3: 1:2,500

020406080

Metres

C402

Date: 22/02/22

HS2

Compulsory purchase

Phase 2a



www.hs2.org.uk

CS1513

Please read this document – it is about your property

Please read on for information in the following languages.

- العربية (Arabic)
- বাংলা (Bengali)
- 中文 (Chinese)
- Français (French)
- ગુજરાતી (Gujarati)
- Polski (Polish)
- Português (Portuguese)
- ਪੰਜਾਬੀ (Punjabi)
- Español (Spanish)
- தமிழ் (Tamil)
- اردو (Urdu)

العربية (Arabic)

هذا المستند بخصوص أملاكك العقارية - اقرأها بعناية. إذا كان لديك أي أسئلة، يرجى التواصل معنا على 08081 434 434 أو مراسلتنا بالبريد الإلكتروني على HS2enquiries@hs2.org.uk. ولأي استفسار أو معلومات بلغة أخرى بخصوص هذا المستند، تفضلوا بالتواصل معنا.

বাংলা (Bengali)

অনুগ্রহ এই নথিটি পড়ুন - এটি আপনার সম্পত্তি সম্পর্কে। যদি আপনার কোনো প্রশ্ন থাকে, অনুগ্রহ করে আমাদের ফোন করুন 08081 434 434 নম্বরে অথবা আমাদের ইমেল পাঠান HS2enquiries@hs2.org.uk ঠিকানায়। আপনি আমাদের সাথে যোগাযোগ করতে পারবেন, যদি আপনাদের এই নথিটি অন্য একটি ভাষায় বুঝতে সাহায্য বা তথ্যের প্রয়োজন হয়।

中文 (Chinese)

此文件涉及您的房产，敬请阅览。如果您有任何疑问，请致电 08081 434 434 或发送电子邮件至 HS2enquiries@hs2.org.uk。对于此文件，如果您需要其他语言的帮助和信息，也可以联系我们。

Français (French)

Veuillez lire ce document - il concerne votre propriété. Pour toute question, veuillez nous contacter au 08081 434 434 ou nous envoyer un e-mail à HS2enquiries@hs2.org.uk. Vous pouvez également nous contacter si vous avez besoin d'aide ou d'information dans une autre langue pour comprendre ce document.

ગુજરાતી (Gujarati)

કૃપા કરીને આ દસ્તાવેજ વાંચો - તે તમારી મિલકત વિશે છે. જો તમને કોઈ પ્રશ્નો હોય, તો કૃપા કરીને અમને 08081 434 434 પર કોલ કરો અથવા HS2enquiries@hs2.org.uk પર અમને ઈમેલ કરો. જો તમને કોઈ અન્ય ભાષામાં આ દસ્તાવેજ સમજવા માટે સહાય અથવા માહિતીની જરૂર હોય તો પણ તમે અમારો સંપર્ક કરી શકો છો.

Polski (Polish)

Prosimy o przeczytanie tego dokumentu - dotyczy on Państwa nieruchomości. Pytania można kierować do nas telefonicznie pod numer 08081 434 434 lub e-mailem na adres HS2enquiries@hs2.org.uk. Prosimy także o kontakt, jeśli potrzebują Państwo pomocy lub informacji w innym języku w celu zrozumienia tego dokumentu.

Português (Portuguese)

Leia este documento – diz respeito à sua propriedade. Em caso de dúvidas, contacte-nos através do telefone 08081 434 434 ou por correio eletrónico para o endereço HS2enquiries@hs2.org.uk. Também poderá contactar-nos se necessitar de ajuda ou informações para interpretar este documento noutra língua.

ਪੰਜਾਬੀ (Punjabi)

ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਦਸਤਾਵੇਜ਼ ਨੂੰ ਪੜ੍ਹੋ – ਇਹ ਤੁਹਾਡੀ ਜਾਇਦਾਦ ਬਾਰੇ ਹੈ। ਜੇ ਤੁਹਾਡੇ ਕੋਲ ਕੋਈ ਸਵਾਲ ਹਨ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਸਾਨੂੰ 08081 434 434 'ਤੇ ਕਾਲ ਕਰੋ ਜਾਂ ਸਾਨੂੰ HS2enquiries@hs2.org.uk 'ਤੇ ਈਮੇਲ ਭੇਜੋ। ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਨੂੰ ਸਮਝਣ ਲਈ ਕਿਸੇ ਹੋਰ ਭਾਸ਼ਾ ਵਿੱਚ ਮਦਦ ਜਾਂ ਜਾਣਕਾਰੀ ਚਾਹੀਦੀ ਹੈ ਤਾਂ ਵੀ ਤੁਸੀਂ ਸਾਡੇ ਨਾਲ ਵੀ ਸੰਪਰਕ ਕਰ ਸਕਦੇ ਹੋ।

Español (Spanish)

Le rogamos que lea este documento relativo a su propiedad. Si tiene alguna pregunta puede llamarnos al 08081 434 434 o enviarnos un correo electrónico a HS2enquiries@hs2.org.uk. También puede ponerse en contacto con nosotros si necesita ayuda o información sobre este documento en otro idioma.

தமிழ் (Tamil)

இந்த ஆவணத்தைப் படிக்கவும் – இது உங்கள் சொத்து விவரங்களைப் பற்றியது. உங்களுக்கு ஏதேனும் சந்தேகம் இருந்தால், 08081 434 434 என்ற தொலைப்பேசி இலக்கத்தில் எங்களை அழைக்கவும் அல்லது HS2enquiries@hs2.org.uk என்ற மின்னஞ்சல் முகவரிக்கு ஒரு மின்னஞ்சல் அனுப்பவும். இந்த ஆவணத்தை வேறு மொழியில் நீங்கள் படிக்க விருப்பப்பட்டால், எங்களை தொடர்புக்கொள்ளவும்.

اردو (Urdu)

براہ کرم اس دستاویز کو پڑھیں۔ یہ آپ کی ملکیت کے بارے میں ہے۔ اگر آپ کے کوئی سوالات ہیں، تو براہ کرم ہمیں 08081 434 434 پر کال کریں یا HS2enquiries@hs2.org.uk پر ہمیں ای میل بھیجیں۔ آپ کو اس دستاویز کو دوسری زبان میں سمجھنے میں مدد یا معلومات کی ضرورت ہو تو بھی آپ ہم سے رابطہ کر سکتے ہیں۔

Introduction

High Speed Two (HS2) is the new high-speed railway for Britain. It is being built by High Speed Two Limited (HS2 Ltd), the company set up by the Government to design and construct HS2.

Phase One of HS2 is being built between the West Midlands and London. It will be followed by Phase 2a, which will connect the West Midlands and Crewe.

Phase 2b will complete the HS2 network: the western leg will extend the railway from Crewe to Manchester, and the eastern leg will connect the West Midlands and Leeds.

We are responsible for making sure that if you're affected by HS2 you understand what to expect and how we can help you.

Phase 2a has been approved by an Act of Parliament, and the Secretary of State for Transport is authorised to obtain, by compulsory purchase, the land that we need to build the railway.

This booklet covers Phase 2a of the route and explains how compulsory purchase affects you.

Compulsory purchase and how it affects you

Land or property can be obtained for a public purpose, such as building a road or a railway, by a legal process called compulsory purchase. In these circumstances, land or property can be bought or occupied with or without the permission of the owner or the occupier.

For HS2, it means the Government can obtain land or property that we need to build Phase 2a of the railway between the West Midlands and Crewe.

You can claim compensation if your land or property is obtained through compulsory purchase.

Why you're receiving this leaflet

Some or all of the land or property you own, or have an interest in, is directly affected by our plans to build HS2. The letter that arrived with this booklet explains what this means for your land or property.

Our Helpdesk and how we can help you

If you have any questions, our HS2 Helpdesk is available 24 hours a day, seven days a week. There are other ways you can contact us, too.

- Freephone: 08081 434 434
- Minicom: 08081 456 472
- Email: HS2enquiries@hs2.org.uk
- Write to us: High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA

Who do I talk to if I have already appointed a land agent to work for me?

If you have already appointed a land agent, please speak to them about how our plans will affect your land or property.

You don't have to wait for your land agent to contact you. You can contact them at any time.

Your land agent will be able to speak to us or our suppliers about any questions you have.

I haven't appointed a land agent or spoken to anyone about compulsory purchase. Who should I contact?

We recommend you appoint a professional adviser about compulsory purchase. They will advise you about your rights and work for you throughout the compulsory purchase process.

You can call the Royal Institution of Chartered Surveyors helpline on 02476 686 555. They will put you in touch with a surveyor in your area, who can give you 30 minutes of free professional advice.

If you have a valid claim, we will repay your agent's reasonable fees for preparing, negotiating and submitting the claim. We will also repay their reasonable fees for acting as your agent on claims and compensation. Please make sure your land agent has agreed any costs with us before starting any work.

You can also contact our Helpdesk for more information about the costs of professional advice. Please ask for our fees policy.

Your rights to compensation

Our website has information about how we will work with you and what support is available during the compulsory purchase process.

You may qualify for compensation if we need to obtain your land or property for HS2. This may include permanently possessing your land, possessing it on a temporary basis, or if we need to access your land or property for surveys.

You can find out about HS2 and properties along the route of the railway from our Helpdesk on 08081 434 434 or by visiting www.hs2.org.uk/in-your-area/assistance-for-property-owners/

You can ask your land agent about making a claim for compensation for this work. If you have not yet appointed a land agent, please see the previous question: 'I have not appointed a land agent or spoken to anyone about compulsory purchase. Who should I contact?'.

Your land agent can help you make a claim for compensation, submit it to us and negotiate for you.

When a claim is agreed, we will pay the amount in full.

You can find out how you can make a compensation claim and how we handle applications for claims at www.hs2.org.uk/documents/collections/claiming-compensation-if-you-receive-a-notice/

Finally, you may be able to apply for an advanced payment. This payment could be made before we agree your claim for compensation. If you want to receive an advanced payment, we recommend that you speak to your land agent about the information you may need to give us so we can assess it.

General Data Protection Regulation

Using your personal information

When would you use my personal information?

We and our partners may collect or use your personal information. We will do this to carry out inquiries into land ownership and occupation within the scheme limits. We may use your personal information if your land and property is affected by our planned construction work. We will send you notices if we need to access your land or property to carry out surveys or if we need your land or property for building purposes. We may also need your information to help us run our safeguarding, discretionary property or compensation schemes.

We will only use your information for the purposes listed above.

Who will use my personal information?

We may share your information with our partners. We will only do this if they need it for the purposes listed above.

How can I find out more?

You can find out more about how we use and store personal information by reading our Privacy Notice at www.hs2.org.uk/privacy-notice/

How do I get in touch?

If you have any questions about how we can process your personal information, you can contact our Data Protection Office.

Email:

HS2dataprotection@hs2.org.uk

Write to:

**Data Protection Officer
High Speed Two (HS2) Ltd
Two Snowhill
Snow Hill Queensway
Birmingham B4 6GA**

Keeping you informed

We are committed to keeping you informed about work on HS2. This includes making sure you know what to expect and when to expect it, as well as how we can help.

Our independent commissioners

We have an independent Residents' Commissioner to make sure we keep to the promises we make in our Residents' Charter.

Our independent Construction Commissioner's role is to mediate and monitor the way we manage and respond to construction complaints.

For more information visit www.hs2.org.uk/in-your-area/assistance-for-property-owners/residents-charter

Holding us to account

If you are unhappy for any reason, you can make a complaint by contacting our HS2 Helpdesk team. For more information visit www.hs2.org.uk/how-to-complain

Property and compensation

You can find out about HS2 and properties along the line of the route by visiting our website. You can also find out if you qualify for compensation. Visit www.hs2.org.uk/in-your-area/assistance-for-property-owners/apply-for-property-assistance-schemes/

Contact us

Our HS2 Helpdesk team are available all day, every day. You can contact them by:

 Freephone
08081 434 434

 Minicom
08081 456 472

@ Email
hs2enquiries@hs2.org.uk

Write to

**FREEPOST
HS2 Community Engagement**

Website **www.hs2.org.uk**

To keep up to date with what is happening in your area, visit:
www.hs2inyourarea.co.uk

Please contact us if you'd like a free copy of this document in large print, Braille, audio or easy read. You can also contact us for help and information in a different language.

We are committed to protecting personal information. If you want to know more about how we use your personal information, please see our Privacy Notice (www.hs2.org.uk/privacy-notice)

High Speed Two (HS2) Ltd

Two Snowhill, Snow Hill Queensway

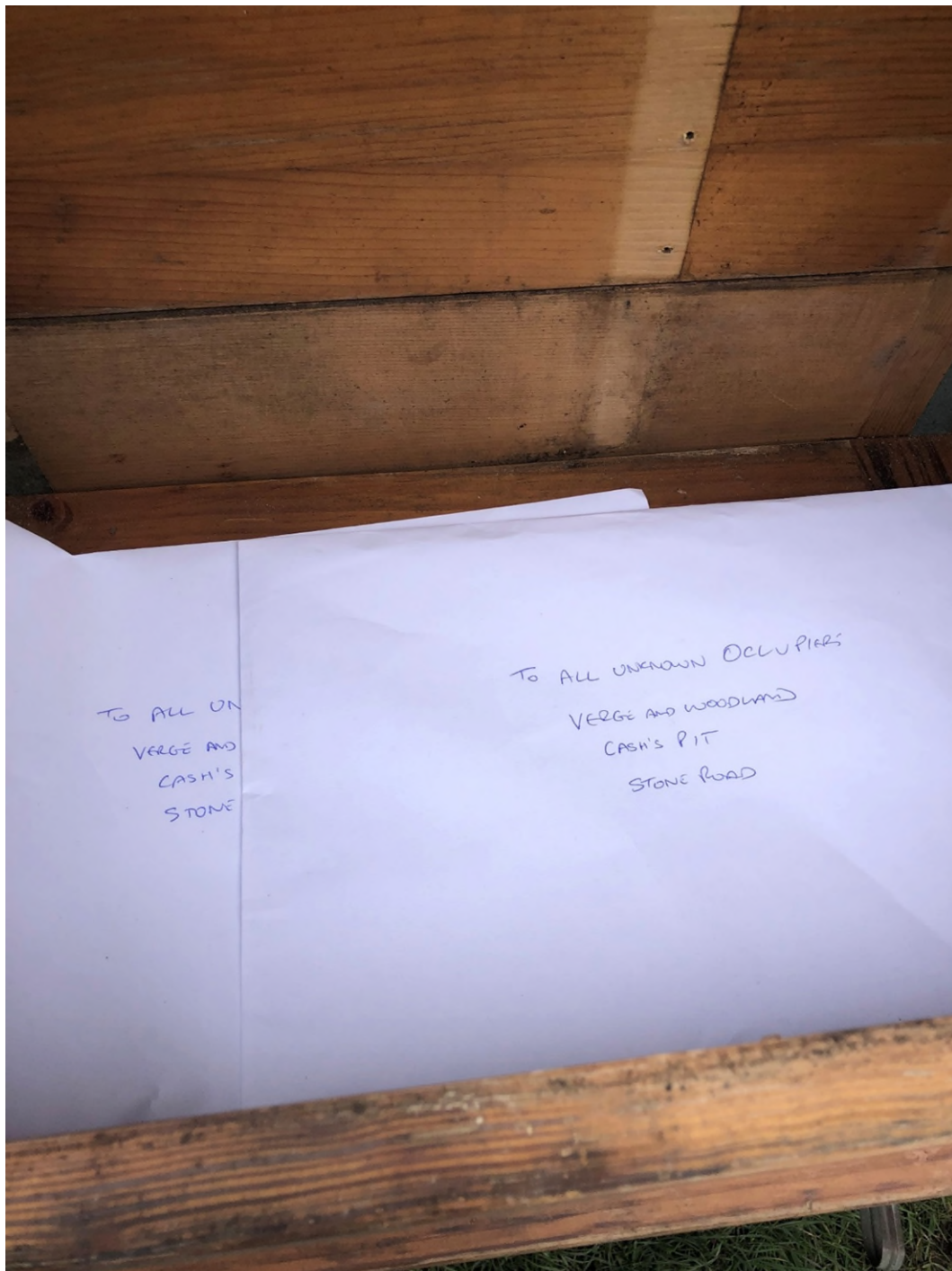
Birmingham B4 6GA

Freephone: 08081 434 434

Email: HS2enquiries@hs2.org.uk

CS1513

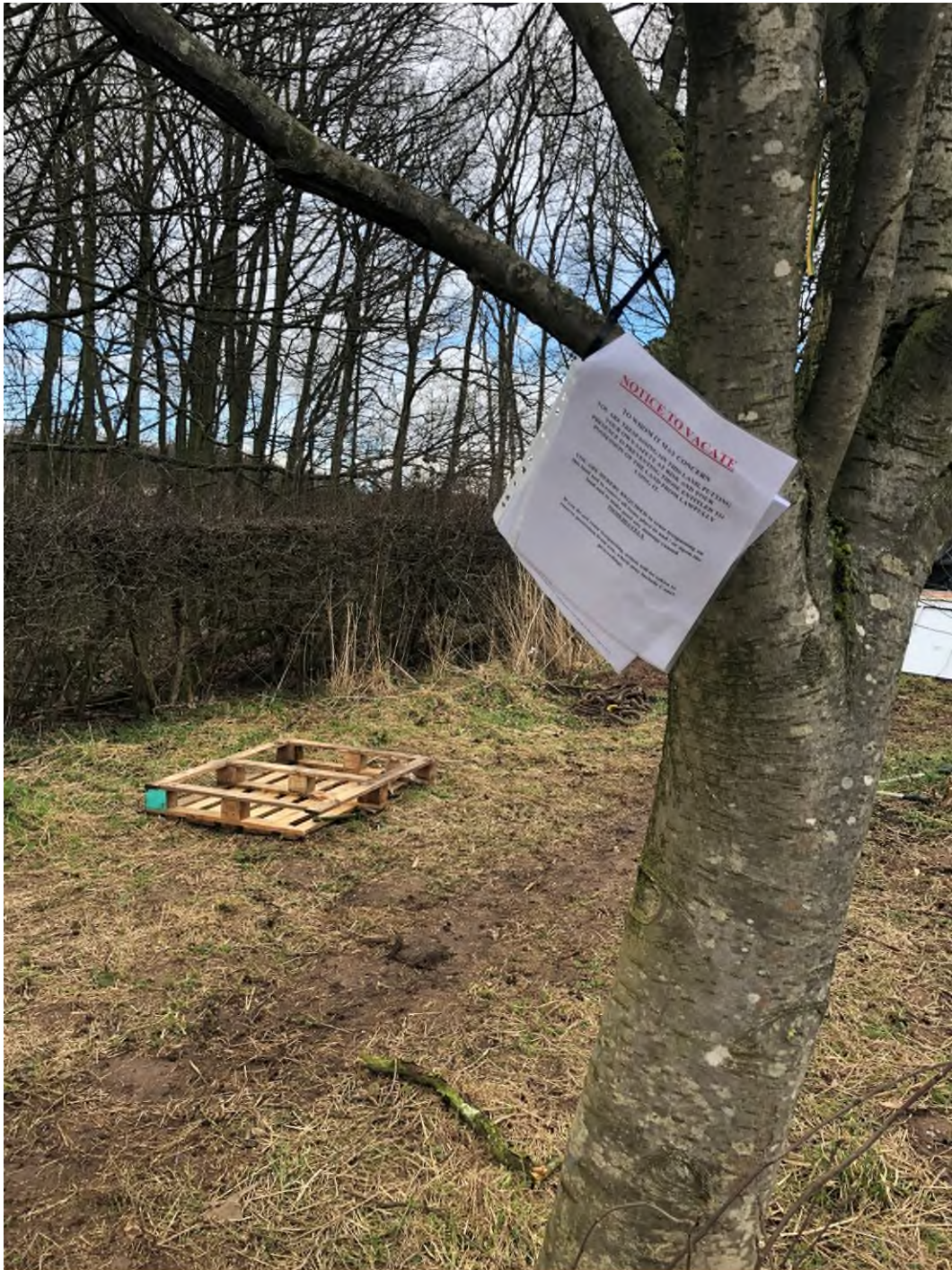
www.hs2.org.uk

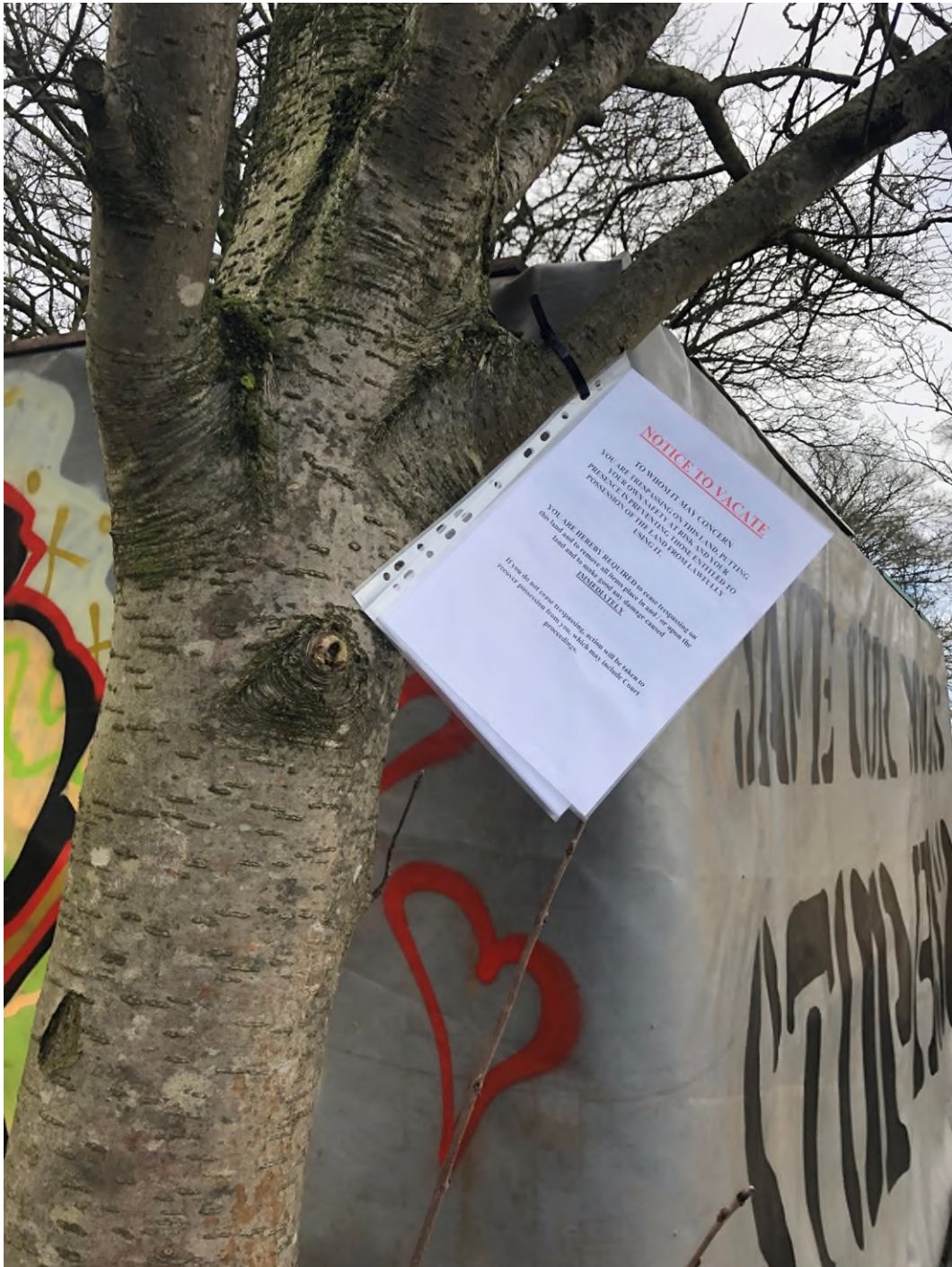
















Plan and manage roadworks

- Home
- Applications and works
- Inspections
- FPN
- Registered reinstatements
- Comments
- Section 81
- Map
- Section 74
- Section 58

BETA This is a new service - your [feedback](#) (/feedback) will help us to improve it.

[jacqueline.stables@arup.com](#) (/user/amFjcXVlbGluZS5zdGFibGVzQGZyYXAuY29t)(Sign out) (/logout)



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USRN details: 37600937 - STONE ROAD, SWYNNERTON [View on map](#) (/location-map?

work_reference_number=TA051EEW-BLUEBELLWOODS-A)

Location details: Verge, Specified sections of the highway verge to the north and south of A51, as identified in red hatching on document ref: C863-MCL-LP-PLN-A000-194840.

Road type: Carriageway type 1 (10 to 30 MSA)

Application details #TA051EEW-BLUEBELLWOODS-A-01

Application status: Granted

Work status: Planned [View works record](#) (/works/TA051EEW-BLUEBELLWOODS-A?backToWorkRecord=true)

Highway Authority: [STAFFORDSHIRE COUNTY COUNCIL](#) (/organisations/3450)

Primary contact: [HS2 LTD](#) (/organisations/7347)

Workstream: 051 - Phase 2a Environmental Works

Works description: Proposed stopping up of specified sections of highway verge. This is for the purposes of HS2 Phase 2A Early Environmental Works on a site known as 'Bluebell Woods'. There will also be partial temporary lane closure and signage in the vicinity, which will form a separate Street Manager/ Schedule 4 submission.

Works category: HS2 (Highway)

Actions

~~Log works start (/works/TA051EEW-BLUEBELLWOODS-A/on-site/start)~~

~~Request change (/works/TA051EEW-BLUEBELLWOODS-A/permits/TA051EEW-BLUEBELLWOODS-A-01/change-request)~~

~~Go to works record to add comments or files (/works/TA051EEW-BLUEBELLWOODS-A/#file_header)~~

~~Go to works history (/works/TA051EEW-BLUEBELLWOODS-A/history)~~

~~Cancel application (/works/TA051EEW-BLUEBELLWOODS-A/permits/TA051EEW-BLUEBELLWOODS-A-01/cancel)~~

Activity and traffic management

HS2 works type

Highway works

Act limit

Inside limit

Protected provisions (exemptions)

None applicable

Consultation end/requested response date

17/03/2022

Activity type

Optional permit (no fee) e.g. for traffic management etc

Response to COVID-19

No

Excavation planned

No

Was an excavation carried out?

No

Required traffic management type

No carriageway incursion

Footway closure

No

Is lane rental applicable?

No

Collaborative working

No

Attachment(s)

~~For approval - Verge for stopping up.pdf (/files/3923199)~~

Dates

Proposed start

24/03/2022 09:00

Proposed end

24/09/2022 16:15

Duration

126 working days (185 calendar days)

Reasonable period end date

24/09/2022

Additional information

Additional works information

Pre-app engagement with SCC *Agreement between Richard Peers (SCC) and HS2 (Ann-Marie Stubbs) on stopping up highway verge on 9 March 2022, with the proviso that the verge and thus road user visibility is not obstructed with equipment or barriers. *Staffs Pre-App Forum on 11 March 2022. Agreed to proposed temporary stopping up (current application) and proposed partial lane closure and signage (to be submitted separately). *Proposal highlighted at TLG meeting on 16 March.

Works reference number

TA051EEW-BLUEBELLWOODS-A

Project reference number

Not provided

Secondary contact

Amberon - Mick Bray

Secondary contact number

07841341492

Secondary contact email

Not provided

Additional contact

Balfour Beatty - Richard Hargreaves

Additional contact number

07511 403916

Additional contact email

Richard.Hargreaves@balfourbeatty.com

Notify user 1 email

HS2.planning@staffordshire.gov.uk

Notify user 2 email

Not provided

Assessment decision:

Granted (auto)

Note

This submission is made by the Contractor on behalf of and as agent for the Nominated Undertaker. HS2 Ltd authorises the contractor to submit the application for consultation or, as required, consent of the highway authority. Contractor must obtain acceptance from HS2 before submission to the highway authority



08/06/2021

BLUEBELL WOODS PROTECTION CAMP - STAFFORDSHIRE

If you go down to the woods today you will be in for a pleasant surprise. A group of environmental activists are building a community there. They aim to stop HS2 in its tracks.

[Read More](#)

AGGRAVATED TRESPASS

[Blog](#) [About](#)

8 Jun

BLUEBELL WOODS PROTECTION CAMP - STAFFORDSHIRE

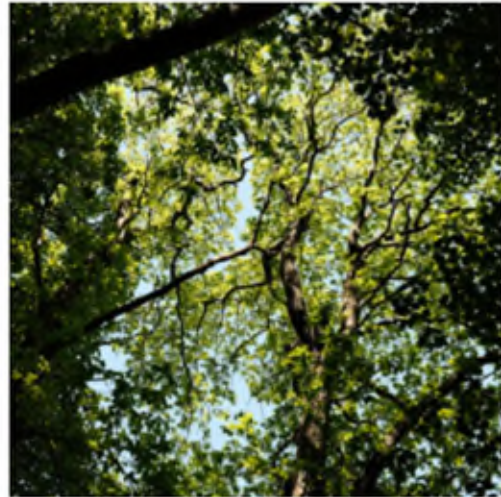
If you go down to the woods today you will be in for a pleasant surprise. A group of environmental activists are building a community there. They aim to stop HS2 in its tracks.



Bluebell Woods Protection Camp is located in a patch of woodland just off the A51 near Swynnerton in Staffordshire. The woodland is due to be cleared to make way for Phase 2a of the controversial HS2 railway line.



The camp itself is easy to find, if you are heading along the A51 you'll likely spot the collection of campervans, vehicles, and tents that are positioned on the edge of the woodland. However, you can't fully appreciate Bluebell Camp until you head into the trees.



There is an impressive two storey treehouse, with plans to add more levels. This is surrounded by tents and hammocks where activists are making themselves comfortable, preparing to be here for the long haul.



The proposed HS2 route will take the railway line straight through this wood, destroying the habitat of many wild animals, and it's not just these activists that are unhappy with it. Baron Francis Fitzherbert, Lord Stafford himself, has also been campaigning against HS2 trying to stop them from cutting a swathe through Staffordshire.



Despite being over budget and behind schedule, and with a huge amount of opposition, it seems the government are hell bent on pushing on with HS2, and the damage and destruction that comes along with it.



Camps like this are popping up all along the planned HS2 route, and they aim to do everything they can to prevent these natural habitats from being destroyed.



In the short time I spent there the camp was a hive of activity. Some residents were rapidly adding to the already impressive treehouse, whilst others were cooking food, and making plans. There is even an area designated for Axe Throwing and Archery.



There is a sign above the entrance to the tree house that states "Trespassers Welcome" and the camp certainly lives up to it. The people there were welcoming, and happy to show anyone around who came to have a nosey.



HS2 Phase 2a has been recently given Royal Assent, meaning environmental work on this section can begin at any time, though construction of the line itself is not due to start until 2024. If there is any hope for saving this woodland the time to act is now.



If you're local to Staffordshire, head down to the camp, get involved - and help them make this the end of the line for HS2.



To find out more about HS2 visit: <http://stophs2.org/facts>

HS2 Camp Locations: <https://www.hs2rebellion.earth/camp-locations/>

Bluebell Woods Protection Camp:
<https://www.facebook.com/Bluebell-Woods-Protection-Camp-102443345283393>



@aggravatedtrespass



Claim No: QB-2022-BHM-000016

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

QB-2022-BHM-000016

Before: Mr Justice Linden

On: 17 March 2022

B E T W E E N:

BALFOUR BEATTY GROUP LIMITED

Claimant

-and-

- (1) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND EGRESS FROM LAND KNOWN AS THE BALFOUR BEATTY COMPOUND, OFF THE A51/A519 ROUNDABOUT, SWYNNERTON, ST15 0QS AND SHOWN MARKED IN BLUE AND GREEN ON THE PLAN APPENDED TO THE PARTICULARS OF CLAIM
- (2) JAMES TAYLOR (a.k.a "JIMMY KNAGGS", "JAMES KNAGGS" OR "RUN AWAY JIM")
- (3) KAREN WILDIN (a.k.a "KAREN WILDING", "KAREN WILDEN" or "KAREN WILDER")
- (4) ANDREW MCMASTERS (a.k.a. DREW ROBSON)
- (5) I.C. TURNER
- (6) LEAH OLDFIELD (a.k.a LEE OLDFIELD or "LEIYAH")
- (7) SAM HOPKINS
- (8) THE INDIVIDUAL WITH THE FIRST NAME "STEPHANIE" (a.k.a "STEFF" OR THE ALIAS "NETTLE")

Defendants

ORDER FOR AN INTERIM INJUNCTION

PENAL NOTICE

**IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER
YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED,
FINED OR HAVE YOUR 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.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

RECITALS

UPON the Claimant's application by an Application Notice dated 10 February 2022 (the "**Injunction Application**").

AND UPON the Court accepting the Claimant's undertaking that it 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 hearing from Mr Daniel Scott, counsel for the Claimant, and the Second Defendant appearing in person

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:

- 1.1 The "**Compound**" means Land known as the Balfour Beatty Site Compound, Off A51/A519 Roundabout, Swynnerton, ST15 0QS, as shaded green and blue on the Plan, and being part of the land registered at HMLR under title no SF521244.
- 1.2 The "**Camp**" means the Bluebell Woods Camp.
- 1.3 The "**Plan**" means the Plan appended to the Particulars of Claim in these proceedings and re-appended to this Order as "**Annex 1**".
- 1.4 The "**Access Way**" means the private vehicular track between the A51 road (the "**A51**") and the Compound, shaded yellow on the Plan.
- 1.5 The "**Bellmouth**" means the splay, and area of hard standing, between the gate to the Access Way and the main carriageway of the A51 over which vehicles travel when turning between the Bellmouth and A51 (and *vice versa*) (as pictured on "**Annex 2**" to this Order).
- 1.6 The "**Gates**" means the metal security gates at the A51 end of the Access Way.
- 1.7 The "**Named Defendants**" means the Second to Eighth Defendants.

Injunction

2. With immediate effect, the Defendants and each of them are forbidden from obstructing or impeding the movement of vehicles, motorcyclists, cyclists or pedestrians travelling into or out of the Compound from or onto the A51, via the Bellmouth and the Access Way, whether by the following methods or otherwise:
 - 2.1 Walking, standing, kneeling, sitting, lying or otherwise being present on the carriageway of the A51 or on the Bellmouth in a manner which impedes the free passage of any vehicle which is attempting to move into the Access Way via the Bellmouth from the A51 or out of the Access Way via the Bellmouth on to the A51;
 - 2.2 erecting any structure or otherwise placing or leaving any vehicle, object, substance or material on the carriageway of the A51, or on the Bellmouth, which impedes the free passage of vehicles between the Access Way and the A51 via the Bellmouth;
 - 2.3 affixing themselves or any other object to the Gates which may delay or impede their operation;
 - 2.4 climbing or holding onto, or affixing any object, themselves or any other person to, any vehicle moving into or out of Bellmouth.
3. The order at paragraph 2 above will remain in effect until trial or further order or, if earlier, a long-stop date one year from the date of the Order.
4. Without prejudice to paragraph 3:
 - 4.1 the continuation of injunctive relief and the appropriate form of order of such injunctive relief shall be subject to further consideration at the hearing to be listed in accordance with paragraph 16 below;
 - 4.2 if the Claimant ceases to have rights to occupy the Compound and private rights of access and egress to and from it via the Access Way, it shall notify the Court as soon as reasonably practicable upon that cessation of rights and show cause as to why this Order should not immediately cease.

Service of these proceedings by alternative method

5. Pursuant to CPR r.6.15 and 6.27:

- 5.1 The steps that the Claimant has taken to bring these proceedings to the attention of the Defendants, as described in the second witness statement of Mr Gary Paton dated 15 March 2022 shall amount to good and proper service of the proceedings on the Defendants and each of them.
- 5.2 The Claim Form and the Application are deemed served on 22 February 2022.
- 5.3 Provision for the filing of acknowledgments of service to the Claim is set out at paragraph 10.1 below.

Service of this order by alternative method

- 6. The Court has provided sealed copies of this Order to the Claimant's solicitors for service (whose details are set out below).
- 7. Pursuant to CPR r.6.27 and r.81.4, the Claimant shall serve this Order upon the Defendants by:
 - 7.1 Delivering copies addressed to each of the Named Defendants and to the First Defendant by description to the post box situated at the Camp in the wooded area shaded in orange on the Plan.
 - 7.2 Affixing copies in prominent positions on the Gates and in prominent positions on the fencing each side of the Gates.
- 8. Service in accordance with paragraph 7 above shall:
 - 8.1 be verified by certificates of service to be filed with Court within seven days of this Order being sealed;
 - 8.2 be deemed effective as at the date of the certificates of service; and
 - 8.3 be good and sufficient service of this Order on the Defendants and each of them and the need for personal service be dispensed with.
- 9. Further, though without prejudice to paragraph 8.3, the Claimant shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant in attendance at the vicinity of the Bellmouth and shall verify any such service with further certificates of service to be filed with Court.

Further Case Management

10. By 4pm on Friday 29 April 2022, any Named Defendant and any other person who falls within the category of First Defendant and who wishes to dispute the Claim shall file at court and provide at the same time to the Claimant (via its solicitors, whose contact details are set out below):
 - 10.1 an Acknowledgment of Service Form, which may be obtained from the court and must include: the person's full legal name and their postal address and/or their email address. If they are unable to provide a postal or an email address they must propose another reasonably practical method by which documents may be provided to them for the purposes of these proceedings;
 - 10.2 a written Defence responding to the allegations set out in the Particulars of Claim (to the extent that they are within the relevant defendant's knowledge); and
 - 10.3 if they wish to rely on evidence, a witness statement, verified by a statement of truth, setting out any evidence on which that Defendant wishes to rely in opposing the continuation or the form of injunctive relief referred to at paragraphs 2 and 3 above or otherwise sought by the Claimant in these proceedings.
11. Any Defendant who fails to comply with paragraph 10, above, by Friday 29 April 2022 will not be permitted to defend or take any part in these proceedings or rely on evidence (as the case may be) without the permission of the Court, and shall be liable to have injunctive relief continued against them without trial pursuant to CPR r.3.5.
12. By 4pm on Friday 27 May 2022 the Claimant, if so advised, shall file any Reply to any Defence filed or any reply evidence. Such Replies and evidence shall be provided to the Defendants at any postal or email address (as the case may be) provided in accordance with paragraph 10.1 above, delivered in hard copy to the Camp and affixed in a prominent position to the fence either side of the Gates.
13. Without prejudice to the foregoing, any 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: (i) provide their full legal name and a postal address and/or an email address to the Claimant's solicitors and the Court. If they are unable to provide a postal or an email address they must propose another reasonably practical method by which documents may be provided to them for the purposes of these proceedings; and (ii) inform the Claimant's solicitors in writing (which includes email) immediately (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below.

14. Any Defendant who files an Acknowledgement of Service pursuant to paragraph 10.1 above, or who applies pursuant to paragraph 13 above, will be added to these proceedings as a Named Defendant.
15. The Claimant shall take all reasonably practicable steps to identify and name those persons falling within the definition of the First Defendant, in order to add them to these proceedings as Named Defendants.
16. The Claimant otherwise has liberty to apply to extend or vary this Order or for further directions.
17. A further case management conference be listed on the first open date after 17 June 2022 with a time estimate of one day. The Claimant shall liaise with the Court's listing office to arrange the listing of that hearing and the Court will be kept informed as to whether one day is in fact required. Further:
 - 17.1 The Claimant shall prepare electronic and hard copy hearing bundles for the hearing and provide the Defendants with access to and/or a copy of each not less than 14 days before the hearing.
 - 17.2 At the hearing, the Court shall consider whether injunctive relief shall be continued against any or all of the Defendants, whether on an interim or final basis.
 - 17.3 Any further application by the Claimant to add further named defendants, to have final relief granted against any Defendant(s) without trial pursuant to CPR r.3.5 and/or otherwise to amend its claim shall be determined at the hearing.
 - 17.4 The need for and form of any further case management directions through to trial or any further hearing shall be considered.
18. The oral judgment of Linden J which was given at the end of the hearing on 17 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 deposited in the post box in the Camp and fixed in a prominent position on the fencing either side of the Gates within 7 days of it being promulgated.
19. The costs of the Injunction Application are reserved.

Communications with Claimants and the Court

20. All communications to the Court about this Order (which should quote the case number) should be sent to the Court address below and copied to the Claimant's solicitors via the contact details below and to other named Defendants:

Birmingham District Registry
Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham
B4 6DW

E: qb.birmingham@justice.gov.uk
T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

21. Any person who wishes to view or download copies of the documents relating to these proceedings shall contact the Claimants' solicitors via the contact details below.

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

Pinsent Masons LLP
30 Crown Place
Earl Street
London
EC2A 4ES

Reference: Michael Fenn/Tom Cottrell/ 009965.07080

Email: SwynnertonCompoundEnquiries@pinsentmasons.com
T +44 (0) 20 7418 7000
F +44 (0) 20 7418 7050
DX 157620 Broadgate








Dated: 17 March 2022

Mr Justice Linden

Annexe 1

THE PLAN



	Access Way – Balfour Beatty Group Limited (“BB”) has private right of access under clause 3.2 (a) of the First and Second Leases in relation to the Access Way
	Compound – the tenant of this land is BB pursuant to the ‘First Lease’
	Compound – the tenant of this land is BB pursuant to the ‘Second Lease’
	Gate to the Access Way
	Bellmouth
	Area known as Bluebell Woods , within which is the Bluebell Woods Camp
	A51 Highway

Annexe 2

THE BELLMOUTH

Aerial footage of the Bellmouth, with dimensions and typical location of protesters



Access Way

Bellmouth

Compound Gate

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**

[Home](#) > [Transport](#) > [Rail](#) > [HS2](#) > [HS2 Phase One](#)

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

 [Get emails about this page](#)

Documents

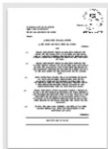


[1. Claim Form HS2 & Or v PU & Ors 25.03.2022](#)

PDF, 1.01 MB, 4 pages

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► [Request an accessible format.](#)



[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

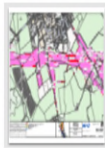


[7. HS2 Land Plans - Part 1](#)

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**
[us on Facebook](#)

🗨️ See our new Community section



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.



HS2 protesters setting up the second camp. (Picture credit: Richard Price)

HS2 aims to ease congestion and over-crowding, an attempt at making the travelling by train option a more convenient and enjoyable one for people.

It also aims to take hundreds of lorries off the roads every day as more freight can move to rail.

The company hopes that this would improve air quality and help reduce carbon emissions.

A spokesperson for HS2 stated: "HS2 will provide zero carbon rail travel from day one, helping the UK to fight climate change.

"We've already started planting seven million trees and shrubs between Birmingham and London.



The sign at Bluebell Wood. (Picture credit: LDRS)

"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

SHARE



7 COMMENTS

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

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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=IwAR0J5hYFWcZC8BU2eEgtgfu7cmND8iEEqkuQ7dIL11WOitSEIET3rxDJ9E>

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.

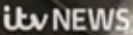

"We're not deliberately putting ourselves in the way of danger, but we will put ourselves in a position where we think we can protect a tree or a piece of land."

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 · 🌐

0:28 / 2:20

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

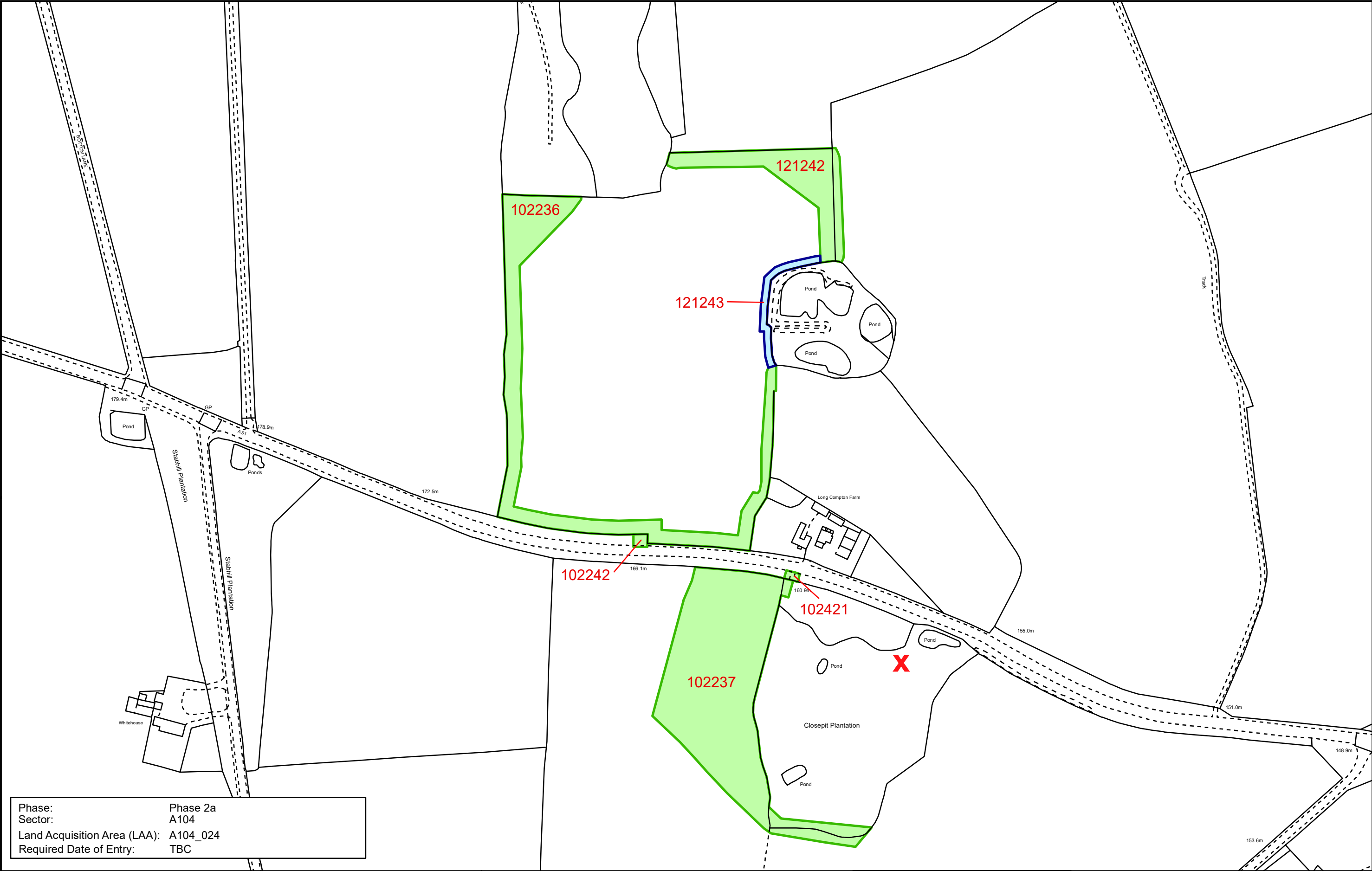


Drew Robson was live.
March 25 at 11:21 AM · 🌐







...

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.

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
Rev	Date	Description	By	Ckd	App


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 4312 30.



Scale at A3: 1:2,500

0 20 40 60 80 Metres

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Ordnance Survey Licence Number 100049190.

Doc Number: C863-MCL-LP-PLN-A000-194024

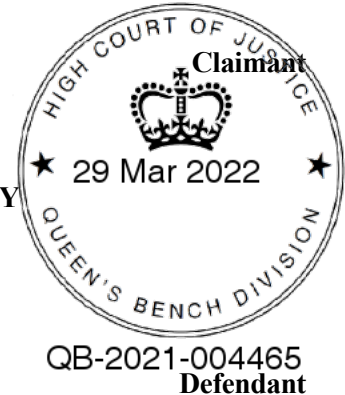
Date: 08/12/21

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**

-and-



QB-2022-000904

Sub Event ID: 3

**(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/