

Claim No: CA-2022-001952
(QB-2022-BHM-000044)

IN THE COURT OF APPEAL (CIVIL DIVISION)

ON APPEAL FROM THE HIGH COURT OF JUSTICE (KBD)

BIRMINGHAM DISTRICT REGISTRY

Between:

MR JAMES KNAGGS

Appellant / Defendant

(AND FOUR CATEGORIES OF PERSONS UNKNOWN AND OTHERS)

- and -

THE SECRETARY OF STATE FOR TRANSPORT

HIGH SPEED TWO (HS2) LIMITED

Respondents / Claimants

SUPPLEMENTARY BUNDLE INDEX

TAB	DOCUMENT	LINK / PAGE REFERENCE
1.	Claimants' Skeleton argument on Legal Principles	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1077272/Claimant s Skeleton Argument on applicable legal principles on 18 May 2022 1_18635962.1 .pdf
2.	First Witness Statement of Julie Dilcock (without exhibits)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1064250/13. Witness statement of Julie Dilcock.pdf

3.	D6's Skeleton argument for hearing 26-27.05.22	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1078076/Skeleton_Served_on_behalf_of_the_Sixth_Defendant.pdf
4.	D6's Skeleton argument for hearing on service 28.04.22	See pages marked 73 – 84 below
5.	First Witness Statement of James Knaggs (D6) (without exhibits)	See pages marked 85 – 101 below
6.	D6's Application to the High Court for permission to appeal	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1108271/96. D6 Application for permission to appeal.pdf
7.	Claimants' Response to D6's Application to the High Court for permission to appeal	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1108275/97. Claimants Response on Consequential Issues.pdf
8.	Extract from Revised HS2 Land Plans (extract of sample plans)	See pages marked 134 – 168 below

IN THE HIGH COURT OF JUSTICE (QBD)

Claim no.: QB-2022-BHM-000044

BIRMINGHAM DISTRICT REGISTRY

Between

(1) HIGH SPEED TWO (HS2) LIMITED

(2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

and

(1) PERSONS UNKNOWN

(2) MR ROSS MONAGHAN AND 58 OTHER NAMED DEFENDANTS

Defendants

SKELETON ARGUMENT ON BEHALF OF JAMES KNAGGS (D6):

SERVICE

Essential Reading: Skeleton Argument

INTRODUCTION

1. This skeleton addresses service provisions for the Claimants application for an injunction in the application dated 28.03.22 (as amended). The Claimants seek an injunction against 3 categories of Persons Unknown covering a vast area from London to Crewe.
2. The Defendant submits that the service provisions outlined in the Claimant's draft order are inadequate.
3. This skeleton argument should be read alongside the Defendant's First Skeleton Argument dated 05.04.22 (at C0102 in the Supplementary Bundle) which set out in outline form the Defendants wider objections to the proposed order.

SCOPE OF THE ORDER

4. Directions for service of the present application must be sufficient to bring proceedings to the attention of all those who may be affected by the claim. It is therefore necessary to gain some understanding of the scope and effect of the order sought by the Claimants in order to place the service provisions in context.
5. The nature of the land covered, the persons affected and the activities sought to be prohibited should therefore be looked at.

The HS2 Land

6. The HS2 Land is defined through a series of maps and plans which number more than 280 pages.
7. It should be noted that the HS2 Land is not limited to isolated areas of countryside. It covers a vast number of roads and urban areas right across the country. Given the vast scope of the injunction application, it has been difficult to analyse the complete scope of the HS2 Land, but it is clear that:
 - i) Some HS2 Land includes public highways varying from large roads to minor footpaths.
 - ii) Some HS2 Land passes through high-density urban areas with multiple roads and properties
 - iii) Some HS2 Land covers woodland and other areas with public access and public rights of way.
 - iv) Some HS2 land includes residential properties as well as commercial buildings.
 - v) Given the wide-variety of land types covered by the order, there are a correspondingly wide-variety of rights of third parties to enter and use such land.
 - vi) Some HS2 Land has been sublet to third parties by HS2, and hence HS2 are not in current possession of the land.

- vii) Some HS2 Land to which the Claimants have a right of temporary possession remains in actual possession and use by the land owner.
 - viii) Most of the HS2 Land is not subject to any physical demarcation or barrier.
 - ix) The HS2 Land comprises a multitude of plots of land which do not cohere in any logical manner.
8. When combined with the wide definition of 'persons unknown' (see below) it is clear that the HS2 Order is not simply limited to protests which stop construction traffic accessing active HS2 Sites. It covers protests which interfere with the flow of traffic at areas of land across the country on which there is no activity by the Claimants.
 9. Notwithstanding the 283 pages of maps which have been produced, the breadth scope and complexity of the land subject to the proposed injunction is such that it is in practical terms not possible for persons to reliably ascertain the scope of the injunction. In any event, it is clear that the injunction fails to comply with the need for clear geographical limits (*Canada Goose*).
 10. Insofar as a comparison is made by the Claimants with injunctions granted to National Highways Limited, these may be distinguished on a number of grounds.
 - i) The service provisions in the National Highway Injunctions required personal service (or an alternative form of postal service) (*National Highways Limited v Persons Unknown* [2021] EWHC 3081 (QB) at [21]). They did not therefore bind persons unknown across the country without restriction.
 - ii) The National Highways Injunctions, particularly insofar as they related to the entire Strategic Road Network, had a short temporal duration of approximately 6 weeks (including the Christmas period when protests were unlikely to have taken place).

Definition of persons unknown

11. The Claimants seek an interim injunction against four categories of persons unknown and 59 named defendants. The categories of persons unknown (as amended) are defined as:

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND KNOWN AS LAND AT CASH'S PIT, STAFFORDSHIRE SHOWN COLOURED ORANGE ON PLAN A ANNEXED TO THE ORDER DATED 11 APRIL 2022 ("THE CASH'S PIT LAND")

(2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND ACQUIRED OR HELD BY THE CLAIMANTS IN CONNECTION WITH THE HIGH SPEED TWO RAILWAY SCHEME SHOWN COLOURED PINK, GREEN ON THE HS2 LAND PLANS AT [website given] ("THE HS2 LAND")

(3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND WITH OR WITHOUT VEHICLES MATERIALS AND EQUIPMENT, IN CONNECTION WITH THE HS2 SCHEME, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT WITHOUT THE CONSENT OF THE CLAIMANTS

(4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS

12. Category (2) applies to anyone who enters HS2 Land without the consent of the Claimants:

- i) It includes those present on HS2 land on public highways. A person who walks over HS2 land on a public footpath is covered by the definition (subject to the consent of the Claimants)
- ii) It includes those present on HS2 land which has been sublet. A person present on sublet HS2 land with the permission of the sublettor but without the consent of HS2 is covered by the definition.

13. Category (3) applies to anyone who does any act which interferes with access/egress from HS2 sites in whatever form and for whatever duration if delay or hindrance of any degree is caused to the Claimants.

- i) It includes those participating in a small demonstration anywhere along the HS2 route which restricts access to an HS2 site for even a matter of minutes.
 - ii) It includes those who interfere with all access points to HS2 land. Therefore it includes those whose actions interfere with access to HS2 land on any public highway, including public footpaths. A small demonstration on a public footpath which crosses HS2 land is therefore covered whatever the degree of interference with access/egress.
 - iii) It includes those who interfere with access to HS2 land for all invitees of HS2. Given the vast area of land covered and the wide array of access rights concerned, this covers those who interfere with access to HS2 land for a wide-range of purposes.
14. There is no restriction on the purpose for which a person might interfere with access to HS2 land. It is not limited to direct-action protests or even to protests of any form. It includes any group, or individual, who protests anywhere on the HS2 land and interferes with traffic seeking access to the land causing some form of delay or hindrance. It would include a group of school children who marched along a country lane to demonstrate against the felling of a wood -or indeed, to protest about a matter unrelated to HS2 but which had the effect of interfering with traffic flow for whatever duration.

Prohibited conduct

15. The draft order filed with the initial application sought to restrict the following:
- i) Persons entering or remaining on the land without the consent of the Claimants
 - ii) Persons obstructing or interfering with the free movement of vehicles, equipment or persons accessing the land.
 - iii) A number of specific acts are prohibited including a specific prohibition on walking slowly in front of vehicles in the vicinity of the land.

16. Essentially any activity on the HS2 Land is made subject to the consent of the Claimants. Activity outside the HS2 Land which interferes with access to the HS2 Land is similarly prohibited.
17. The draft order seeks to carve out an exception for those exercising rights of way but makes no attempt to address any other form of access rights over the HS2 Land.

Conclusion

18. It is clear from the above that the category of persons potentially affected by the proposed order and the range of conduct that is subject to prohibition is vast.

SERVICE

Legal framework

19. CPR 6.15 states:

6.15— Service of the claim form by an alternative method or at an alternative place

- (1) Where it appears to the court that there is a good reason to authorise service by a method or at a place not otherwise permitted by this Part, the court may make an order permitting service by an alternative method or at an alternative place.

20. CPR 55.6 states:

55.6 Service of claims against trespassers

Where, in a possession claim against trespassers, the claim has been issued against “persons unknown”, the claim form, particulars of claim and any witness statements must be served on those persons by—

- (a)
 - (i) attaching copies of the claim form, particulars of claim and any witness statements to the main door or some other part of the land so that they are clearly visible; and
 - (ii) if practicable, inserting copies of those documents in a sealed transparent envelope addressed to “the occupiers” through the letter box; or
 - (b) placing stakes in the land in places where they are clearly visible and attaching to each stake copies of the claim form, particulars of claim and any witness statements in a sealed transparent envelope addressed to “the occupiers”.
21. In *Cameron v Liverpool Victoria Insurance Co Ltd* [2019] 1 WLR 1471 Lord Sumption stated:

“... Justice in legal proceedings must be available to both sides. It is a fundamental principle of justice that a person cannot be made subject to the jurisdiction of the court without having such notice of the proceedings as will enable him to be heard. The principle is perhaps self-evident. ” (at [17])

“In my opinion, subject to any statutory provision to the contrary, it is an essential requirement for any form of alternative service that the mode of service should be such as can reasonably be expected to bring the proceedings to the attention of the defendant. ” (at [21], emphasis added)

22. Similar requirements were included in the Court of Appeal judgment in *Canada Goose UK Retail Ltd v Persons Unknown* [2020] EWCA Civ 303:

“(1) The “persons unknown” defendants in the claim form are, by definition, people who have not been identified at the time of the commencement of the proceedings. If they are known and have been identified, they must be joined as individual defendants to the proceedings. The “persons unknown” defendants must be people who have not been identified but are capable of being identified and served with the proceedings, if necessary by alternative service such as can reasonably be expected to bring the proceedings to their attention. In principle, such persons include both anonymous defendants who are identifiable at the time the proceedings commence but whose names are unknown and also Newcomers, that is to say people who in the future will join the protest and fall within the description of the “persons unknown”.

23. In *Barking and Dagenham LBC v Persons Unknown* [2021] EWHC 1201 (QB)

Nicklin J stated:

“45. I recognise that the method of service he [the claimant local authority in a Traveller injunction case] proposed reflected the well-established regime for possession claims against unknown trespassers (CPR 55.6). And there can be no real doubt that, in a claim against alleged trespassers in present occupation whose names are not known, displaying prominently the Claim Form (or copies of it), on or around the various sites in respect of which an injunction was to be sought, can usually be expected to bring the proceedings to the attention of the defendants. However, the whole point of Traveller Injunctions was to bind persons who turned up at the land only after the injunction had been granted. In respect of that category of defendant, posting copies of the Claim Form at the various sites was not likely to be an effective means of bringing the proceedings to their attention. To take an obvious example, displaying copies of the Claim Form at the Dagenham Road Car Park (or at any of the other sites covered by the injunction granted to LB Barking & Dagenham) was not likely to bring the proceedings to the attention of a family of Travellers in Rochdale. The first such a family was likely to discover about the proceedings, that had led to an injunction being granted against them, was when they subsequently pitched their caravan for an overnight stay in the Dagenham Road Car Park.

...

47. ...the Court must adopt a vigilant and more rigorous process when considering applications under CPR 6.15 for alternative service of the Claim Form on “Persons Unknown”. If the requirements of *Cameron* cannot be met, permission for alternative service should be refused. ...In practical terms, the advocate will be expected to demonstrate, by evidence filed in compliance with CPR 6.15(3)(a), how the proposed method of alternative service on the Person(s) Unknown can reasonably be expected to bring the proceedings to the attention of all of those who are sought to be made defendant(s). The greater and more ambitious the width of the definition of “Persons Unknown” in the Claim Form correspondingly the more difficult it is likely to be to satisfy the requirements for an order for alternative service.

48. Save in respect of the exceptional category of claims brought contra mundum, it is difficult to conceive of circumstances in which a Court would be prepared to grant an order dispensing with the requirement to serve the Claim Form upon "Persons Unknown" under CPR 6.16 (*Cameron* principle (5)). Consequently, if the Court refuses an order, under CPR 6.15, for alternative service of the Claim Form against "Persons Unknown", the jurisdiction of the Court cannot be established over the "Persons Unknown" defendants. Without having established jurisdiction, there will be no viable civil claim against them. With no civil claim, there can be no question of granting (or maintaining) interim injunctive relief against "Persons Unknown".

...

166. These principles also apply equally to proceedings which are brought against (or include) "Persons Unknown". The Claim Form must be served on "Persons Unknown". Ordinarily, that will require an order for alternative service under CPR 6.15. If the claimant cannot obtain an order for alternative service – because no method can be devised that can reasonably be expected to bring the proceedings to the attention of all of those identified as the "Persons Unknown" – and the Court does not dispense with service of the Claim Form – then the Court's jurisdiction cannot be established over the "Persons Unknown". In that event, there will be no viable civil claim and there will be no question of any injunction being granted, whether interim or final."

24. None of the above principles were criticised by the Court of Appeal in *LB Barking and Dagenham v Persons Unknown* [2022] EWCA Civ 13.
25. Regarding protest cases, in *Secretary of State for Transport and HS2 v Cuciurean* [2020] EWHC 2614 (Ch) service provisions for an injunction order (rather than initial application were considered).

"CPR 81, as I have described, makes provision for service by alternative means. The whole point of this jurisdiction is to enable proper service to be effected by a different means, a means other than personal service. Any judge exercising this jurisdiction – particularly when the order in question is going to bear a penal notice – will be concerned to ensure that whatever method of alternative service is adopted is sufficient to bring to the notice of the persons concerned both (i) the existence of the order and (ii) either the terms of the order or else the means of knowing the terms of the order. " (at [62])

26. In *Cuciurean v Secretary of State for Transport and HS2* [2021] EWCA Civ 357 The Court of Appeal further addressed the issue of service of an order:

"...The Court went on to state at [82(5)] that where alternative service is ordered, "the method ... must be set out in the order." Methods of alternative service vary considerably but typically, in trespass cases, alternative service will involve the display of notices on the land, coupled with other measures such as online and other advertising."

27. Paragraph 70 sets out the extensive steps taken to serve the order in that case with extensive signs placed around the land affected -which was a relatively small area in comparison to the land in the present case- and other further steps.
28. In Gypsy and Traveller borough-wide injunction cases, which typically prohibit unauthorised encampments rather than any wider conduct, the following

provisions on service were adopted in *Wolverhampton City Council v Persons Unknown* [2018] EWHC 3777 (QB).

“... I have been provided with a statement of Miss Danielle Taylor, which sets out the steps that have been taken to comply with those directions. In particular, Miss Taylor informs the court that the council, the claimant, published on a dedicated page on its website the documents which were detailed in the learned judge's order; posted a link to the dedicated website by pinning it to their social media pages on both Twitter and Facebook; issued a press release which was covered in the Express and Star newspaper; placed an editorial in the Wolverhampton edition of that paper publicising details of the application and today's hearing; and, with a view to those potentially affected who may use other social media or alternatively have issues reading the materials provided, uploaded to YouTube and the claimant's website and other social media pages a video outlining the nature of the application. Finally, copies of the relevant documents were affixed in transparent waterproof envelopes at a prominent position at each of the 60 sites proposed to be covered by the injunction and they have been checked on a weekly basis and replaced where necessary.” (at [1], emphasis added)

29. The Court of Appeal in the related case of *LB Bromley v Persons Unknown* [2020] EWCA Civ 12 approved the approach taken in *Wolverhampton* and stated:

32. Article 6 of the Convention provides that:

"In the determination of his civil rights and obligations or of any criminal charge against him, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law".

33. This is reflective of a principle of English law that civil litigation is adversarial: "English civil courts act *in personam*. They adjudicate disputes between the parties to an action and make orders against those parties only" (*A-G v Newspaper Publishing Plc* [1988] Ch 333, per Sir John Donaldson MR at [369C]). This allows disputes to be decided fairly: a defendant is served with a claim, obtains disclosure of the evidence against them, and can substantially present their case before the Court (*Jacobsen v Frachon* (1927) 138 LT 386, per Atkins LJ at [393]). This allows arguments to be fully tested.

34. The principle that the court should hear both sides of the argument is therefore an elementary rule of procedural fairness. This has the consequence that a court should always be cautious when considering granting injunctions against persons unknown, particularly on a final basis, in circumstances where they are not there to put their side of the case."

Proposed Service Requirements in Draft Order

30. The provisions for service of the proposed injunction are:

Service of this Order by alternative method.

...

11. Pursuant to CPR r6.27 and r.81.4:

- a. [service on Cash's Pitt defendants]
- b. Further, the Claimant shall serve this Order upon the Second, Third and Fourth Defendants by:

- i. Affixing 10 copies in prominent positions on each of the Cash's Pit Land, the Harvil Road Land and the Cubbington and Crackley Land.
 - ii. [Other methods as directed by the Court]
 - c. Although not expressed as a mandatory obligation due to the transient nature of the task, the Claimants will seek to maintain copies of this Order on areas of HS2 Land in proximity to potential Defendants, such as on the gates of construction compounds or areas of the HS2 Land known to be targeted by objectors to the HS2 Scheme.
 - d. [service on named defendants]
 - e. The Claimants shall further advertise the existence of this Order in a prominent location on the following website: <https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings>, together with a link to download an electronic copy of this Order.
 - f. The Claimants shall email a copy of this Order to each of the email addresses set out in the list appended at Annex C.
 - g. [Any other methods discussed and directed by the Court including by social media].
12. Service in accordance with paragraph 11 above shall:
- a. be verified by certificates of service to be filed with Court;
 - b. be deemed effective as at the date of the certificates of service; and
 - c. be good and sufficient service of this Order on the Defendants and each of them and the need for personal service be dispensed with.
13. Further, without prejudice to paragraph 12, while this Order is in force, the Claimants shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant which it becomes aware is in attendance at the HS2 Land and shall verify any such service with further certificates (where possible if persons unknown can be identified) of service to be filed with Court.

Submissions

31. Given the nationwide scope of the present injunction it is quite clear that the provisions above are not sufficient to bring the present proceedings to the attention of all of those bound by the order.
32. A person planning a demonstration on HS2 Land which passes by the access point to a site is bound by the HS2 order; however, the steps for alternative service cannot reasonably be expected to bring the proceedings to his/her attention.
33. It is notable that the service provisions in relation to the National Highways Injunctions on which the Claimants rely required either personal service or an alternative form of postal service (*National Highways Limited v Persons Unknown* [2021] EWHC 3081 (QB) at [21]).

34. It is not for the Defendant to specify the method of service to be adopted, if any sufficient method exists in the present case. However, principle requires that all those affected by the proposed order are given notice of these proceedings. That, at a minimum includes:
- i) All those in current occupation of the HS2 Land
 - ii) All those who own or have an interest in the HS2 Land
 - iii) All those who may in the future occupy, own or gain an interest in the HS2 Land during the duration of the order (and any likely extension)
 - iv) All those who regularly use the HS2 Land
 - v) All those who live or work in the vicinity of the HS2 Land
 - vi) All those who regularly use land in the vicinity of the HS2 Land
35. A bare minimum requirement for service is to attach stakes at prominent locations on each and every parcel of the HS2 Land providing copies of this application, claim form and other relevant documents. With enough notices at each piece of land to bring the proceedings to the attention of any person who enters or otherwise uses the land. Such notices to be checked on a weekly basis. For the avoidance of doubt, the Defendant does not accept that the above would constitute sufficient service in the present case, but is a bare minimum requirement.
36. Whatever difficulties may arise from service on newcomers in the present case, the provisions for alternative service must comply with the law. The present provisions proposed by the Claimants are not sufficient to bring this order to the attention of all of those who are to be affected by it and such an order for alternative service should not be made.

CONCLUSION

37. It is the Defendant's submission that the breadth and scope of the order sought is such that no provisions for alternative service will be sufficient to satisfy the legal requirements and the claim should therefore be dismissed. In the

alternative, the Defendant respectfully asks that the court makes orders for alternative service in line with the principles above.

Owen Greenhall
Garden Court Chambers
28.04.22

On behalf of: Sixth Defendant
Name: J Knaggs
Witness statement: First
Exhibits: JK1-12
Date: 20.05.22

IN THE HIGH COURT OF JUSTICE (QBD)

Claim no.: QB-2022-BHM-000044

BIRMINGHAM DISTRICT REGISTRY

Between

(1) HIGH SPEED TWO (HS2) LIMITED

(2) THE SECRETARY OF STATE FOR TRANSPORT

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(1) PERSONS UNKNOWN

(2) MR ROSS MONAGHAN AND 58 OTHER NAMED DEFENDANTS

Defendants

WITNESS STATEMENT OF JAMES KNAGGS (SIXTH DEFENDANT)

I, James Knaggs, of No Fixed Abode, formerly at Cash Pits, WILL SAY as follows:

1. I am a longstanding campaigner and peaceful protestor concerned about the environmental impact of the HS2 rail project. I am the Sixth Defendant in this case. This statement has been prepared and approved by me.

2. I make this statement in relation to my opposition to the HS2 Injunction sought by the Claimants. I believe that the application for the injunction is wrong. I believe that the application for the injunction is deliberately intended to frustrate peaceful and lawful protest against a contentious infrastructure project.
3. In this statement I address the following topics:
 - i) My opposition to the HS2 project
 - ii) Previous campaigning on HS2
 - iii) My concerns over the injunction
4. In this statement I address some of the matters raised in the statement of Richard Jordan dated 23.03.22. Due to the length of that statement, the timescale covered, the number of matters raised and the extremely short timescale for producing this statement I have not been able to address every matter referred to. In summary, I believe that he has produced a misleading and selective account of events.
5. I have been aware of previous injunctions taken out by hs2 and have not knowingly breached any injunction

My opposition to HS2

6. I oppose HS2 for the following reasons.
7. First, HS2 does not resolve the transport problems of the nation. HS2 is a project that only assists a very small number of people travelling between major cities and or from airports. It does not address the issue of the lack of capacity in the

system. It does not promote sustainable travel between local hubs. There have been a number of other proposals in relation to changes to the rail network which would allow local people better to use the rail network and better to use sustainable transport. Instead, very large amounts of Government money has been poured into the HS2 project and other projects which really would deliver on sustainable transport such as the Northern rail project are under funded and have been unable to continue. In those circumstances HS2 is clearly not an answer to the transport needs of the country and in fact undermines the growth and development of the sustainable transport networks.

8. Second, HS2 is a project that offends against all of the principles that the Government purports to sign up to in relation to sustainability. There have been recent agreements that the Government have entered into such as Cop 26 and the Paris Accord which are designed to reduce emissions and prevent climate change. The Accord talks about the need to avoid felling trees. The Accord talk about the need to consider projects and to ensure that projects are not unsustainable. Where projects emit very significant amounts of carbon then those projects contribute to climate change. There is a developing view that we must view projects that cause climate change as being ecocide meaning the criminally wrongful destruction of the environment.
9. HS2 is a project that even with a 120 year life cycle will never be sustainable. The amount of emissions from the HS2 project will never be offset by any reduction in any other form of transport. It is clear that the HS2 will contribute to ecocide, by which I mean unlawful or wanton acts committed with knowledge that there is a substantial likelihood of severe and either widespread or long-term damage to the environment being caused by those acts.

10. Third, in terms of the damage that the HS2 project is doing to particular pieces of countryside, it is quite clear that in different areas of the country it is causing potentially catastrophic damage to woodland, wildlife and also potentially to aquifers. The project requires the felling of trees some of which are ancient woodland. There has been apparently provision put in place for the planting of new trees and also for the translocation of soils. However, there is significant evidence to suggest that these measures will not mitigate the damage caused by HS2. There was a report from the Wildlife Trust and the Woodland Trust which clearly stated that the damage caused by HS2 to environments could not be mitigated by the measures that were suggested I exhibit that report marked JK1. Similarly, in cutting down large areas of woodland the project causes significant damage to wildlife. Mitigation measures are insufficient to be able to protect wildlife. Experience shows that Hs2 do not properly follow mitigation procedures

11. Fourth, in order to be able to operate this infrastructure project the Government passed the HS2 Acts (the High Speed Rail (London – West Midlands) Act 2017 and the high Speed Rail (West Midland – Crewe) Act 2021). These give HS2 as a corporate body enormous powers to buy land, regulate the use of land, influence and impose non-disclosure agreements, give grants to communities sometimes with conditions, to destroy ancient woodland, to bypass other legislation that seeks to protect wildlife and the environment. The Acts also limit the influence that local authorities and local Government can have on the scheme and restricts their ability to prevent destruction to local communities. HS2 has a very significant budget and there is very little oversight or control of what H2S does. It is therefore a corporate body which is able to use and abuse its power and does so on a regular basis. There are numerous examples of the way in which HS2 have misused public funds and have also acted in an overzealous manner towards protest.

12. I believe that in the debate and discussion about the merits of the HS2 Project Parliament was deliberately misled about the potential cost of the project and that the decision to continue with the project was made on information that was known to be incorrect.

Previous Protest activity

13. A national scheme of this size is necessarily going to cause some opposition on both a local and national level.
14. I have been protesting against HS2 for some time. I have posted on Facebook, and I have written articles on social media about the activities of HS2. I do note that certain of my writings are referenced in the statement of Richard Jordan. I do note that the articles that have been chosen are selectively chosen. I have posted on social media quite regularly. Where I have posted about getting people to act this is because it is important that we are able to continue a peaceful protest against HS2. The purposes of my articles are to ensure that people are aware of the risk to their homes and livelihood from HS2 and also to ensure that people are aware that they can protest against HS2. I do not believe that have said anything that is improper or inappropriate. I would say that much of what is posted on Facebook and through social media sites is designed to encourage people to come and talk to us about the scope of the HS2 scheme.
15. We are very much asking people to attend in order to be able to find out information and to learn how HS2 may impact upon them. Because HS2 is such a large scheme very many people have not fully understood from correspondence that they have received the consequence of HS2 for them. Very often people do not understand the full scale of the impact of HS2. For that reason it is important that people have a means to find out and understand the consequence to the project to them. Information that is put on websites etc can

often be quite complicated to follow. The maps may be quite difficult for them to understand and to access and therefore what we will do in speaking to people is offer the opportunity for them to really understand how they may be impacted. I believe that this action is a necessary function of democratic engagement. Obviously, where communities then realise the negative impact of HS2 upon their communities then they can express their views and their oppositions through the ballot box. If they do not have the information then they are disenfranchised.

16. Much of the protest at Harvil Road centred around concern that the HS2 project would cause very significant damage to an aquifer. There was concern that the aquifer that supplies up to 20 percent of London's drinking water may be compromised by the HS2 project. Again, there has been significant reporting and expert opinion given in this regard. During the building work around the chalk aquifer there was discussion about the risk of the use of Bentonite. Bentonite escaping into the chalk aquifer would prove disastrous for the chalk aquifer. During the consultation in relation to the project, HS2 stated clearly that they would prevent Bentonite contaminating the chalk aquifer. Instead, approximately 20,000 tonnes of Bentonite has "escaped" and is now polluting the chalk aquifer. HS2 have tried to cover up this catastrophic spill. This is an example of how HS2 will pollute but then seek to cover up their actions.
17. In the papers for the present case, there is reference to protest at the Balfour Beatty site. Prior to the injunction that was taken out by Balfour Beatty there were lawful and proportionate protests that were ongoing. The local police had been spoken to. Protests continued for a short period each day. There was liaison with the local police to confirm that any protests on the highway were proportionate and no arrests were undertaken. Despite the fact that there was lawful protest Balfour Beatty then sought to take out an injunction. Once the injunction was taken out that injunction was complied with.

18. There is much in the injunction application in relation to the suggestion that protestors against HS2 act inappropriately or unlawful. That is not true, HS2 protestors have been the victims of aggression and assault from HS2 security staff. The following are relevant matters:

- i) Concerns over the tactics used by HS2 and the means of enforcement by their security staff have been raised in court previously. There are a number of claims ongoing for personal injury from people who have suffered significant injury at the hands of HS2. There have been lots of injuries including a broken jaw. There are many instances of violence in particular I would reference:
 - a. On the 4th May 2020 The Mirror newspaper reported a man having been attacked at Crackley Woods. He was shown on a report to have blood coming from his head. The local MP Michael Fabricant and Lord Randall expressed concerns about the tactics used I exhibit this article marked JK 2
 - b. On the 20th November 2020 ITN filmed a security guard kneeling on the neck of a protestor. I exhibit this video marked JK 3.
 - c. On 21st April 2020 NET attempt to forcefully remove ancient woodland protectors from non-HS2 owned land where they were watching two nest to make sure wildlife crimes did not take place. Eviction was at this time unlawful under the coronavirus regulations. I attach the video marked JK4.
 - d. Peaceful protestors were assaulted at Harvill Road. I attach the video marked JK 5.
 - e. On the 26th April a protestor was removed from a tree in a manner that appeared to render him unconscious. I attach that video marked JK 6.
 - f. On the 26th February 2021 an activist was injured causing it is believed broken bones. I exhibit the video footage marked JK7.

- g. In April 2020 HS2 bailiffs used violence against members of the community in Crackley Wood. I attach the video marked JK8.
 - h. On 13th October 2020 a 69 year old man was assaulted whilst on a public footpath. I attach the video marked JK9.
 - i. On the 9th October 2020 contractors hired to force assaulted protesters while off duty. Four National Eviction Team (NET) bailiffs were suspended following a confrontation with three activists in a hotel car park in Kenilworth, Warwickshire, which left one in hospital with a broken jaw. The protesters were driving home from an HS2 Rebellion camp in nearby Cubbington and pulled in at the Ramada Warwick Hotel, where NET enforcers were known to be staying, to try and guess how many bailiffs would be present at the camp's eviction the next day by counting the vehicles. Driver Alex, 24, who did not wish to give his full name, told Metro.co.uk: 'As we turned around in the car park one of them blocked us from leaving with his vehicle, forced entry to our car and took the key, although I was able to snatch it back. "The three bailiffs who were high ranking well known security officials were charged with GBH and false imprisonment. This will be heard in Crown Court on the 23rd of January 2023. I attach a report from the Metro newspaper marked JK10. These are only a few of the examples of inappropriate conduct and violence used by HS2 staff. I believe Sally Brooks was injured by HS2. A woman called Victoria had her arm in a sling. Elliott Cuciurean had very badly burnt fingers after an eviction. Other protestors have similarly been injured.
- ii) There have been examples of times when HS2 have sought to cut off footpaths that they do not have the power to restrict. There have been at least nine investigations into wildlife crime. Unfortunately, due to non-

disclosure agreements we do not know what the outcome of those investigations are.

- iii) There is a view that HS2 contractors are happy to exaggerate incidents in order to increase the value of their contract.
- iv) There have been periods of time when HS2 have undertaken unlawful evictions. During the Covid 19 pandemic when evictions were banned HS2 continued unlawfully to evict people.
- v) There are numerous occasions when HS2 staff who are undertaking security work cover their faces and do not give details of their SIA badge numbers and, who appear deliberately to disguise their identity.

19. HS2 security is often very heavy handed and aggressive. The above matters are representative of incidents the actions of HS2 staff and security in their enforcement of previous injunctions and other court orders.

20. There is grave concern that the way in which HS2 operate is unregulated and leads to an abuse of power. HS2 regularly use non-disclosure agreements with people they purchase land from. Non-disclosure agreements are also used with public health bodies and local councils and, with other organisations. The use of non-disclosure agreements prevents them being answerable to the wider community. We understand over 400 non-disclosure agreements have been signed with various bodies. We understand that Hs2 requires councils to sign these before they will engage with them to discuss issues of local importance. Given the very wide powers in the HS2 act they are able to do this. These NDAs are then used to prevent legitimate enquires being made of public bodies about the HS2 project. In a recent Public Accounts Committee meeting Mark Thurston from HS2 accepted that HS2 buys more land than it needs to prevent protest. He confirmed 12 square km of land was bought unnecessarily.

21. They have very wide powers to force the sale of land and will often by land (using taxpayers' money) simply to frustrate entirely lawful protests. In and around Cashpitts, following the order of the court, some protestors have moved to a different site on private land. That is not land that is in the possession of HS2. However, to frustrate people moving to another local site HS2 have bought little strips of land around the site meaning that the site is now cut off and they will not give access to a piece of privately owned land to which they have no right of possession. I exhibit a map marked JK11. They prevent people entering onto that land meaning that people cannot for example go to the local shops to buy supplies. The people on that land are people seeking to comply with the court order for possession. They are people of no fixed abode who have nowhere else to go. They are trying to act lawfully and HS2 are preventing them from utilising a piece of land that they have every right to use.

22. As a result, because people could not access that camp they then moved to another piece of land again not owned by HS2 and again HS2 bought a further piece of land to prevent them residing at that address. I exhibit a map marked JK12. HS2 therefore are deliberately frustrating homeless people in finding somewhere to live. Further, these are bully boy tactics to prevent people who wish to lawfully and peacefully protest being anywhere near an HS2 site.

23. Finally, there are often occasions where land is inadequately signed and fenced and therefore, it is very often impossible to know where HS2 land starts and ends. HS2 own vast amounts of land and the injunction map covers a huge area. Of that only a very small amount is fenced and signposted as land the public do not have a right to access. In Crackley and Cubbington it was accepted during injunction proceedings that the majority of the land was not either surrounded by fences or marked. It was accepted that it was only areas of active work that were fenced off and that those areas would move as work moves. It is common practice for HS2 only to fence off an active compound. Even in contentious areas

this is still the practice. For example subsequent to the injunction being imposed on Cash Pits HS2 bought the nearby grass verge. The fencing only restricts access to about half the verge. Thus when BBC news crew arrived and parked on what appeared to be a normal grass verge security became agitated that they were breaching the injunction. Unless one has a precise knowledge of all the maps exhibited it is impossible to know where HS2 land is or is not. In Harvil Road there was a local canal that is apparently part of the route. It was never fenced in and could regularly be used. In Jones Hill Wood there was a walk of about 3 miles from Jones Hill Wood to the "WAR" camp. Security would say it was HS2 land but there were no signs up. The maps are at quite a large scale and do not always show all the landmarks etc. Near to cash Pits is the Coldmeets pumping Station. This is a Grade 2 listed building which operates as a museum. I understand consideration was given to whether it could be used for HS2. As it could not be a new station will be built nearby. To the ordinary member of the public this is a public museum that people can visit. It is however part of the HS2 land as I understand.

My concerns about the injunction

24. In a democratic society we should be able properly to protest against a local scheme which has a devastating impact upon the lives of very many people. Many people will lose their homes. Many communities will be torn apart, many people will find that their property values are blighted by this scheme. It is obviously right that people are entitled to express their views about the scheme and this injunction appears to be attempting to prevent people from protesting against what is controversial scheme. The injunction seeks to prevent protest on land that is clearly owned fenced in and restricted. It also prevents protest on land that is open, unfenced, unsigned, and ordinarily open to the public. It seeks to prevent protest on roads that are part of the public highway. It seeks to undermine lawful protest which is tolerated and policed by local police forces.

25. From my understanding notices of an intention to take temporary possession are served under sched 15 triggering 28 day notice period to allow HS2 possession rights. However in the vast majority of cases no attempt is made to enter land or carry out works for months or years. Landowners are usually told that works will commence much later. In relation to Cashpits it is understood that no works are to take place for over a year .We understand that the main work of building the line is not scheduled until 2024 and may be later . There are therefore significant parts of the land that will not be the subject of any works for years.
26. It seeks moreover to shield HS2 from proper scrutiny. Many of the protests that are organised at a local level are intended to scrutinize the actions of HS2 had to ensure that they behave properly, and responsibly. Local people want to check that HS2 are cutting down trees that they are entitled to cut down, to ensure that they do not cut down trees unnecessarily, to ensure that wildlife mitigation schemes are effective and to ensure that HS2 do not exceed their legal powers. This injunction will seek to prevent such scrutiny.
27. I would wish to address the concerns that I have in relation to this matter specifically relating to the injunction proceedings. I am concerned that the injunction that is proposed is: -
- i) unnecessary
 - ii) of too wide a scope
 - iii) likely to have a chilling effect on protest
 - iv) potentially encompassing land that is not properly owned by HS2
 - v) potentially exposing people to the risk of expensive and frightening committal proceedings for acting entirely lawfully
 - vi) potentially putting individuals at the mercy of violent and aggressive tactics by HS2

vii) potentially enabling HS2 to act unlawfully by depriving the project of adequate scrutiny

28. I believe that the injunction in its current form is unnecessary. There have been injunctions over time on different pieces of land. There have been injunctions at Harvil Road and at Crackley / Cubbington. Those injunctions covered specific pieces of land for specific periods of time. It is my understanding that ordinarily where there is an injunction against certain types of behaviour at a certain location the court should review that injunction periodically to ensure that it is still necessary. In this case for example, whilst at one point there was protest in the Harvil Road area arising from the way in which HS2 were conducting their work particularly in light of the potential damage to the chalk aquifer, there is now very little protest.

29. The protests at Harvil Road were against HS2 at a point where HS2 were actually causing damage to the aquifer and the injunction was designed to deal with that. At present, there is no camp at Harvil Road and my understanding is there is really no need for an ongoing injunction at that point.

30. It cannot be right that there are indefinite injunctions without any form of review over huge swathes of land. The HS2 project is designed to continue until 2040. It cannot be right that the map and the areas protected by an injunction are subject to injunctive relief that could arguably last for years and years and prevent legitimate protest and legitimate concerns as time goes on.

31. I am concerned that the injunction will catch a lot of people who have no idea of the impact of HS2 upon them and how they may or may not choose to raise issues with HS2 staff as time goes on. At the location in Cashpitts for example, I have spoken to neighbours. They were not aware of what HS2 were doing, they were

not aware of why we were there. It was only once we had put a Facebook post up that they then became aware of the fact that the HS2 development will in time take away the whole of the road in front of their property and every woodland for miles around.

32. These people had not received correspondence about the extent of the project as they were tenants of a local landowner. In those circumstances, they had not been specifically informed of the development. They had not been specifically informed of the scope of the development; they had not been specifically informed about how that may affect them. In those circumstances, without groups like ourselves being around people who will be directly affected by HS2 simply do not know the impact that it may have on their lives. These individuals will not necessarily receive documentation in relation to the injunction, they will not understand that the injunction applies to them as they will not know anything about it.

33. I am aware that in relation to the recent Cashpitt injunction there is a local woman whose driveway is in effect injunctioned by the injunction. I understand that the Court directed that she was to be served with the injunction. As far as I am aware she has not been served directly with the injunction. This is an example of somebody who has a direct concern because her driveway is injunctioned and she has not received proper notification of the hearing or of the order. The reason I know this, is because that is a house that would previously have supplied us with water and now as a consequence of the injunction we cannot go to her house for water.

34. I believe that there will be a very large number of people who may be affected by the injunction who at present do not necessarily understand that there is something to protest or be concerned about but when they find out that there

is something to protest about and to be concerned about will then find that they are entirely prevented from taking any action.

35. Protestors do for the main part seek to protest lawfully and in a proportionate and careful manner. The reason that camps are set up is in order that we can be close to the sites that are being developed and so that we can inform local people and so that we can protest in the face of HS2. Protest is inevitably ineffective unless one can protest in the face of HS2. We want to be able to speak to those people working for HS2 in order that they may understand what they are part of. We want to be able to communicate with local people. We want local people to understand the consequences and the risks. We want to inform the general public of the damage that is being caused to the environment. It has always been accepted in the United Kingdom that one can protest lawfully.

36. If this injunction is granted it will prevent people from protesting lawfully. It will prevent local groups from demonstrating at the gates to HS2 sites. Communities have as this project has been going held vigils at different locations. Those vigils would be banned. In Wendover for example there was a community area where trees were cut down. The trees had been planted as a memorial orchard for children who had died in the community. The community wished to hold a vigil as the trees were being cut down in order to remember the children who had died. Under this injunction potentially holding such a vigil for such an important reason would be impossible.

37. At Leather Lane there is a strong community group which regularly organises vigils and protests. It has not been linked with protest camps but despite this peaceful protest would be banned. It is of concern that local people in local communities will not necessarily know that their democratic right to protest is being curtailed as they will not know of the injunction.

38. There have been concerns over the period of time that HS2 has been operating that HS2 has not complied with their legal requirements in relation to the protection of woodlands and wildlife. There have been numerous reports of HS2 failing to comply adequately with legislation for the protection particularly of bats and badgers. Many of these concerns have been reported to the police but the police cannot act without evidence. Individuals will seek to monitor what is ongoing by walking around HS2 sites to check that badger mitigation measures are in place, or in the case of woodlands to confirm that replanting is ongoing. There have been concerns about the quality of the ecologists work and certainly in some areas local people have reported that ecologists have not adequately identified where colonies of bats and other animals are. There was a case concerning the protection of an Alder Tree at Denham where it became clear the ecologist was not properly qualified. Again, it is only the work of people observing monitoring that mean that where there is unlawful activity that unlawful activity is identified. If this injunction continues then the rights of local members of a community to monitor whether HS2 are behaving lawfully will be prevented.
39. I am very concerned that the injunction would be impossible to comply with as a consequence of a lack of obvious signage meaning that people legitimately using the land may be subject to an inappropriate penalty.
40. There are many instances of a chilling effect on protest due to injunctions such as in Harvill road where people such as local councillors, who had been long term campaigners stopped because of the fear of committals. Many protesters left the area through fear of being caught in an injunction proceeding due to the ambiguity of HS2's, service, fencing, signs, and markings.

41. Recently Balfour Beatty put an interim injunction on the gate local to cash's Pitt land. Before that point long term campaigners and local people joined in regular protests 6 to 8 times a month for a limited number of hours and always at a predictable time. However, before the injunction was even given an order locals and other protesters would not attend due to a fear of being caught up in injunction proceedings. The judge's order ruled that "the days of far reaching injunctions were over" so said we must not impede the access of vehicles, pedestrians or cyclists. This has had a chilling effect on protests because local people will not attend anywhere they could be even possibly named despite it being peaceful and lawful. This is because they do not trust HS2 security not to play games in order to catch people. The long term harassment and surveillance put on campaigners and locals puts people at fear of having their names taken and social media stalked, with drones overhead and 24/7 roving patrols local people are already scared enough, without the threat of seizure of assets for protesting on a gate they had otherwise lawfully been allowed to for the past year by the police! There have been no protest at the gate since an utterance of an injunction despite and future protest not being in breach of the injunction.

STATEMENT OF TRUTH

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

Signed:.....Confirmed by telephone with James knaggs

.....

Dated:20th May 2020.....

IN THE COURT OF APPEAL (CIVIL DIVISION)

Claim no.: CA-2022-001952

ON APPEAL FROM THE HIGH COURT OF JUSTICE (KBD)

(QB-2022-BHM-000044)

BIRMINGHAM DISTRICT REGISTRY

Between

MR JAMES KNAGGS

Appellant/Defendant

(AND FOUR CATEGORIES OF PERSONS UNKNOWN AND OTHERS)

and

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

**Respondents/
Claimants**

EXTRACT FROM REVISED HS2 LAND PLANS

(EXTRACT OF SAMPLE PLANS)

The following documents consist of a selection of maps depicting land subject to the HS2 Injunction Order. There are 6 overview maps and a selection of detailed maps. The maps are broadly arranged in route order progressing South to North.

Map number	Exhibit page	Description
	F186	Phase One Area South Key Plan
	F002	Phase One Area Central (1) Key Plan
	F061	Phase One Area Central (2) Key Plan
	F107	Phase One Area North Key Plan
	F108	Phase One Area North (Curzon Spar) Key Plan
	F227	Phase 2A Area Key Plan
1	F187	HS2 Injunction Map (part of Phase One Area South)
3	F189	HS2 Injunction Map (part of Phase One Area South)
13	F200	HS2 Injunction Map (part of Phase One Area South)
26	F217	HS2 Injunction Map (part of Phase One Area South)

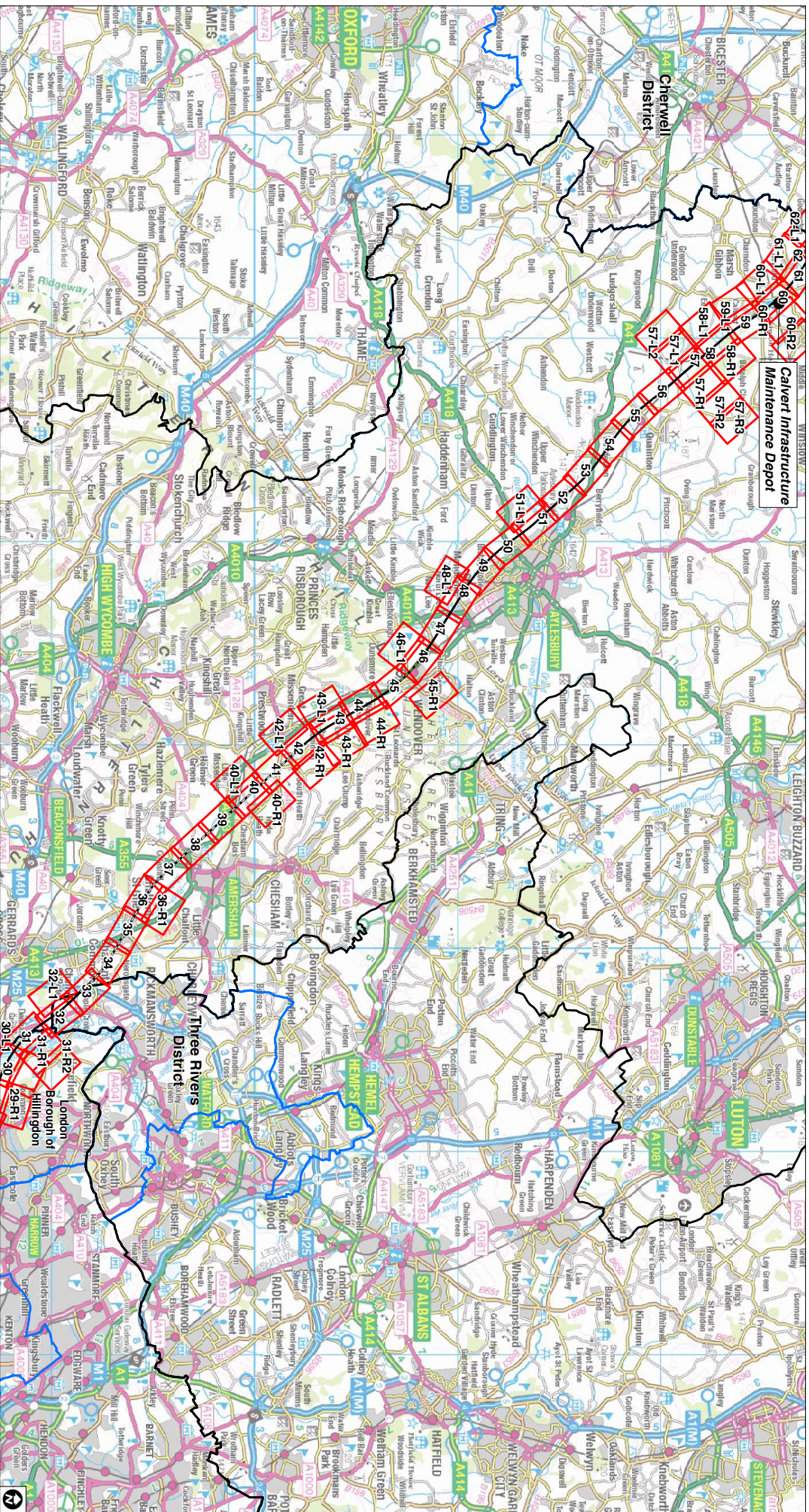
28-R1	F220	HS2 Injunction Map (part of Phase One Area South)
30	F224	HS2 Injunction Map (part of Phase One Area South)
35	F010	HS2 Injunction Map (part of Phase One Area Central (1))
42	F020	HS2 Injunction Map (part of Phase One Area Central (1))
45	F028	HS2 Injunction Map (part of Phase One Area Central (1))
57-L1	F048	HS2 Injunction Map (part of Phase One Area Central (1))
59	F053	HS2 Injunction Map (part of Phase One Area Central (1))
63	F065	HS2 Injunction Map (part of Phase One Area Central (2))
83	F098	HS2 Injunction Map (part of Phase One Area Central (2))
86	F104	HS2 Injunction Map (part of Phase One Area Central (2))
93	F119	HS2 Injunction Map (part of Phase One Area North)
103	F135	HS2 Injunction Map (part of Phase One Area North)
106	F140	HS2 Injunction Map (part of Phase One Area North (Curzon Spar))
108	F142	HS2 Injunction Map (part of Phase One Area North (Curzon Spar))
120	F156	HS2 Injunction Map (part of Phase One Area North (Curzon Spar))
129	F173	HS2 Injunction Map (part of Phase One Area North)
131	F178	HS2 Injunction Map (part of Phase One Area North)
133	F181	HS2 Injunction Map (part of Phase One Area North)
136	F229	HS2 Injunction Map (part of Phase 2A Area)
143	F249	HS2 Injunction Map (part of Phase 2A Area)
144	F251	HS2 Injunction Map (part of Phase 2A Area)
163	F278	HS2 Injunction Map (part of Phase 2A Area)
165	F280	HS2 Injunction Map (part of Phase 2A Area)

The map illustrates the proposed Crossrail 2 route through London. The route is shown as a red line with numbered segments (1-33) and specific station locations marked with red boxes. The route starts in the City of Westminster, passes through the City of London, and continues through the London Boroughs of Camden, Brent, Ealing, and Hillingdon, eventually terminating near the Three Rivers District. The map also shows the boundaries of various London boroughs and districts, as well as major roads and landmarks. A legend in the bottom right corner identifies the route and the stations.

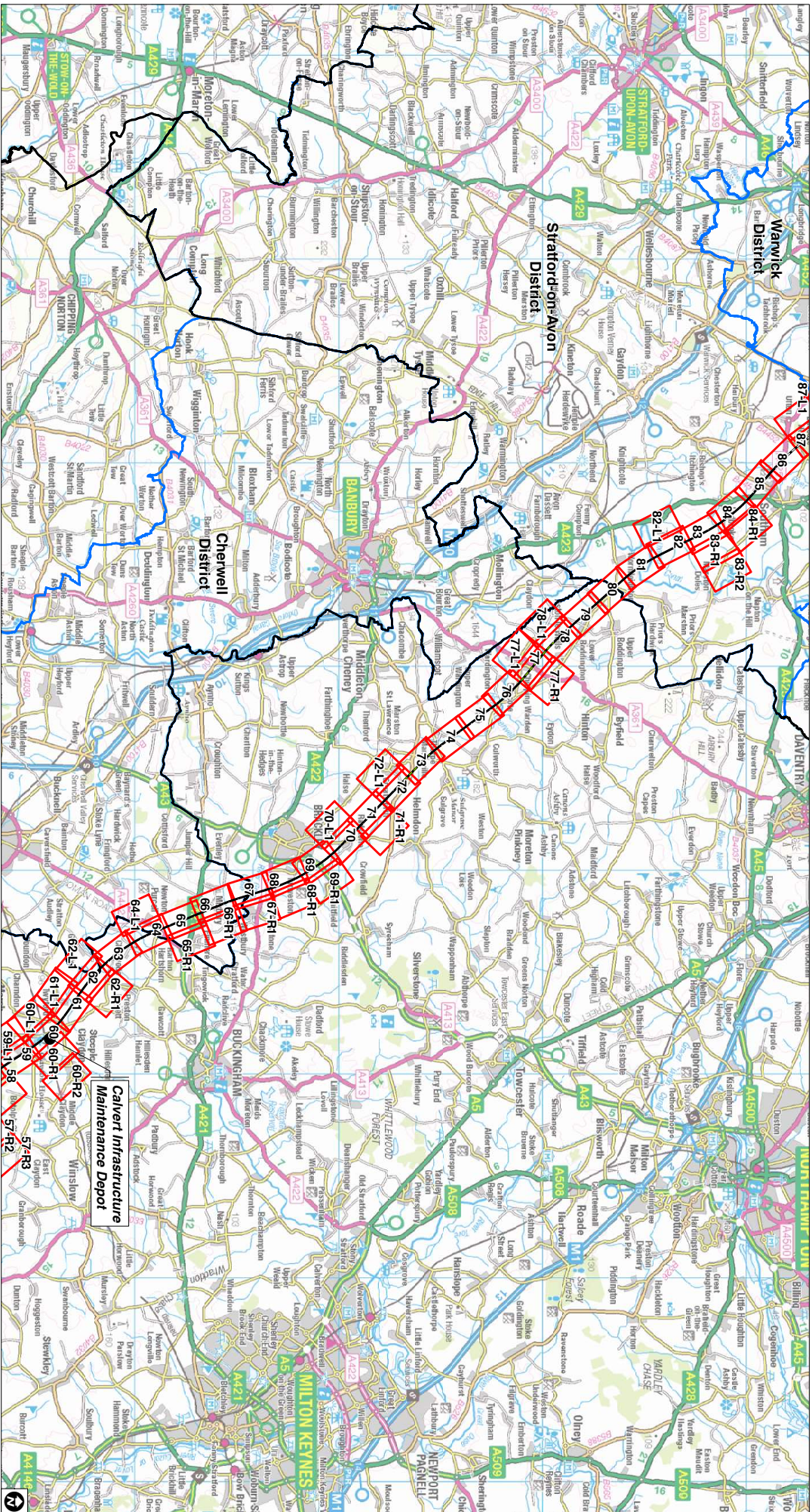
Legend:

- Crossrail 2 route
- Station Station

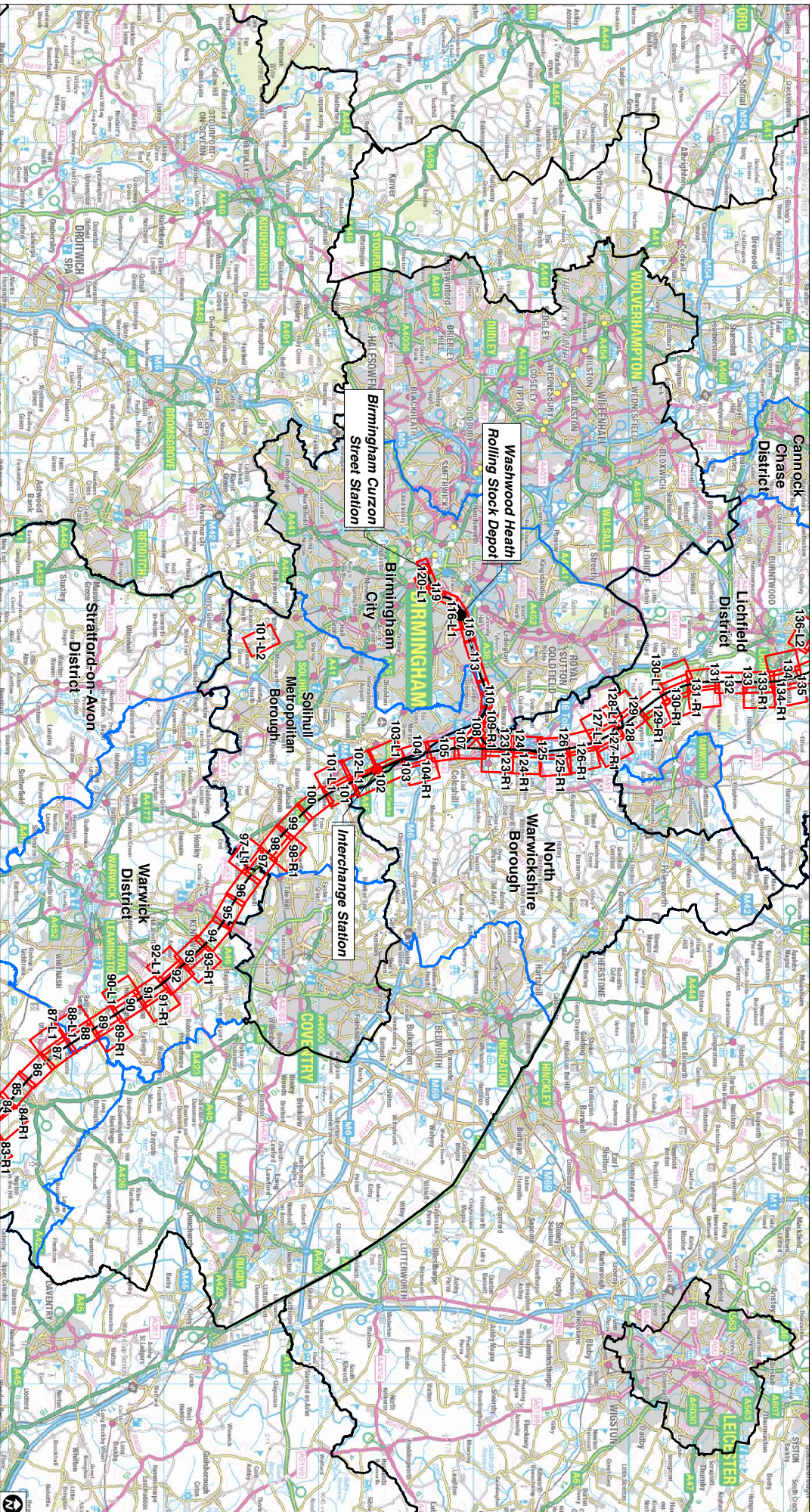
PHASE ONE AREA CENTRAL (1) KEY PLAN



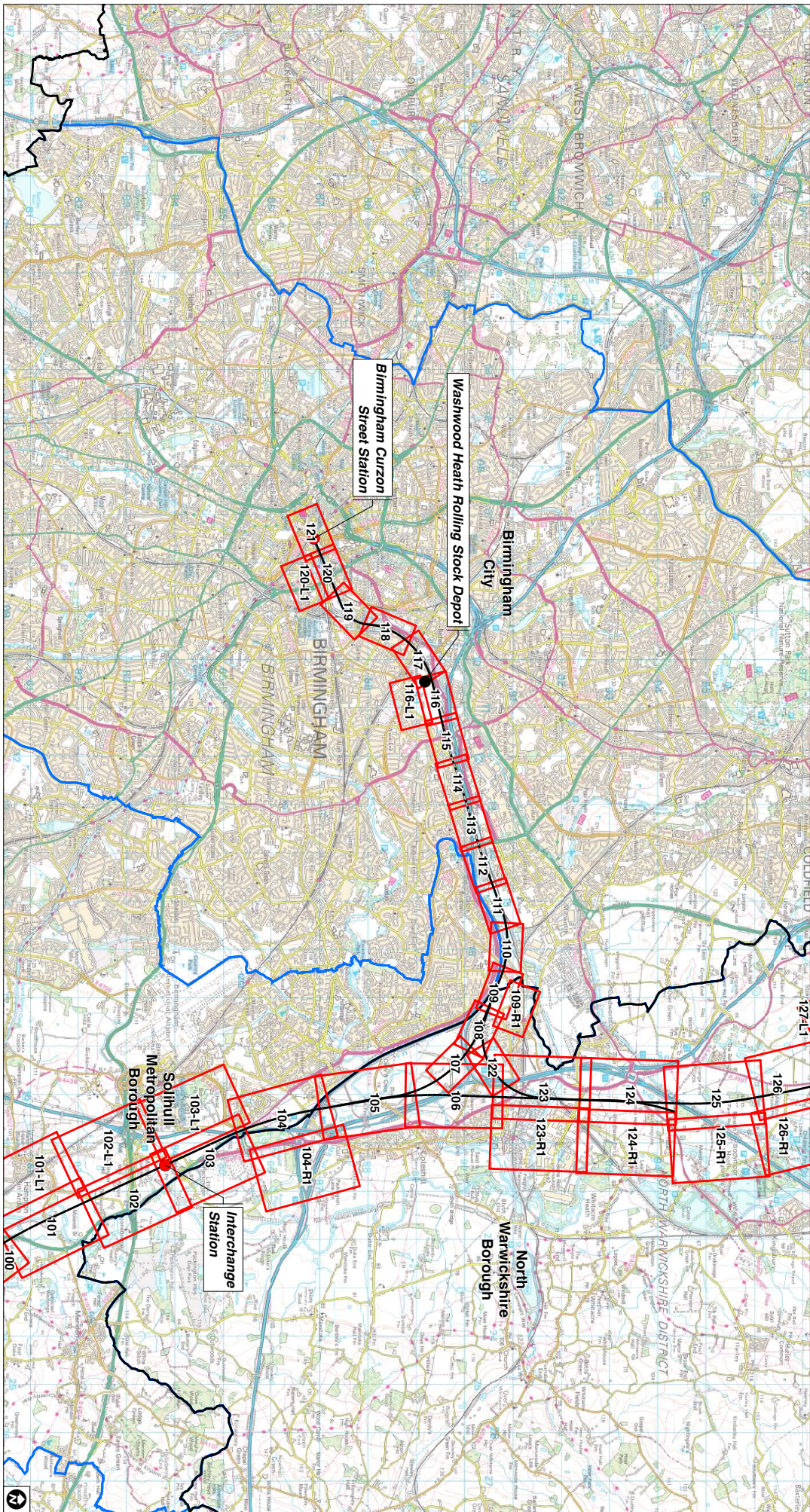
PHASE ONE AREA CENTRAL (2) KEY PLAN



PHASE ONE AREA NORTH KEY PLAN



PHASE ONE AREA North (Curzon Spur) KEY PLAN

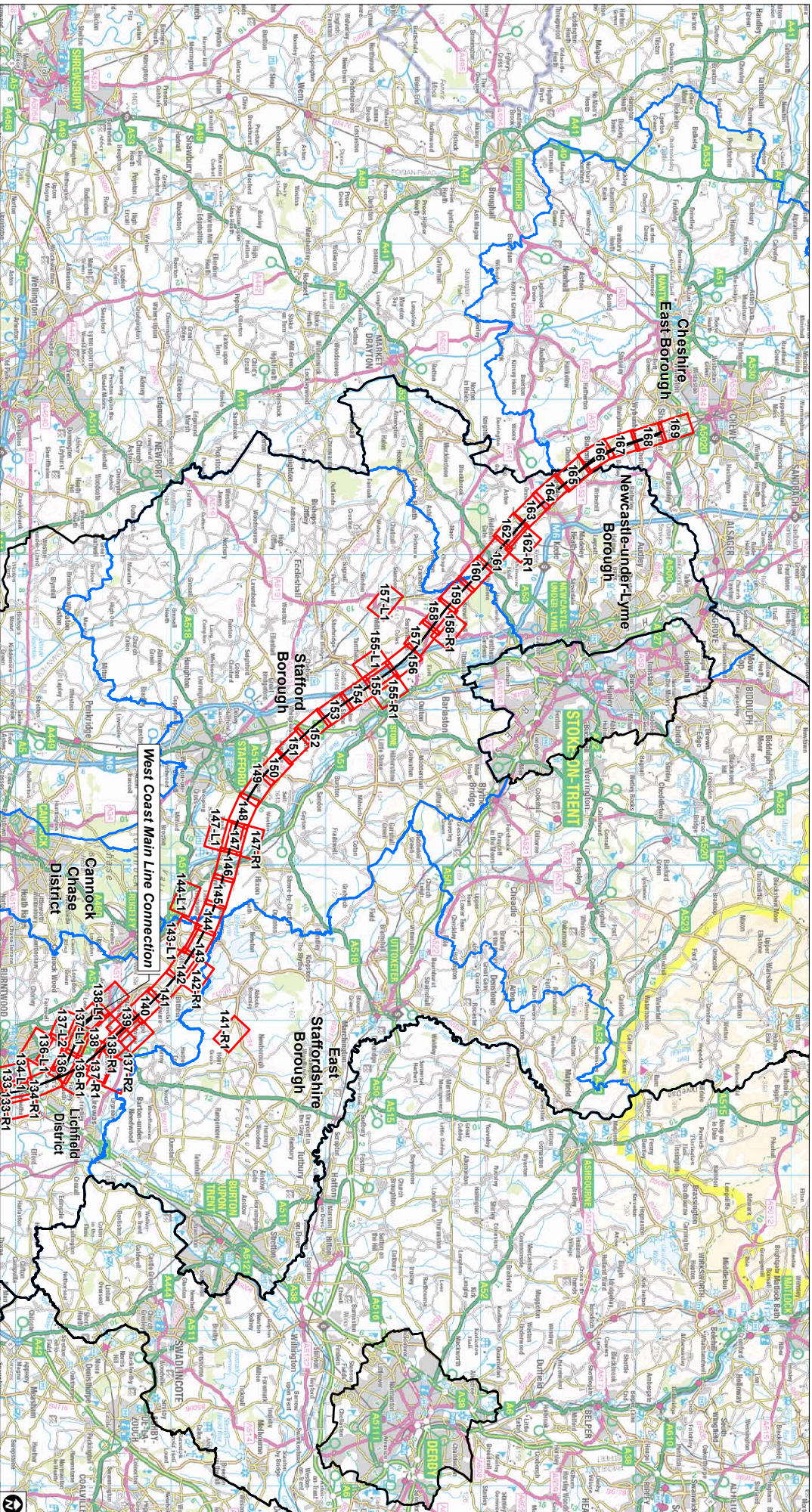


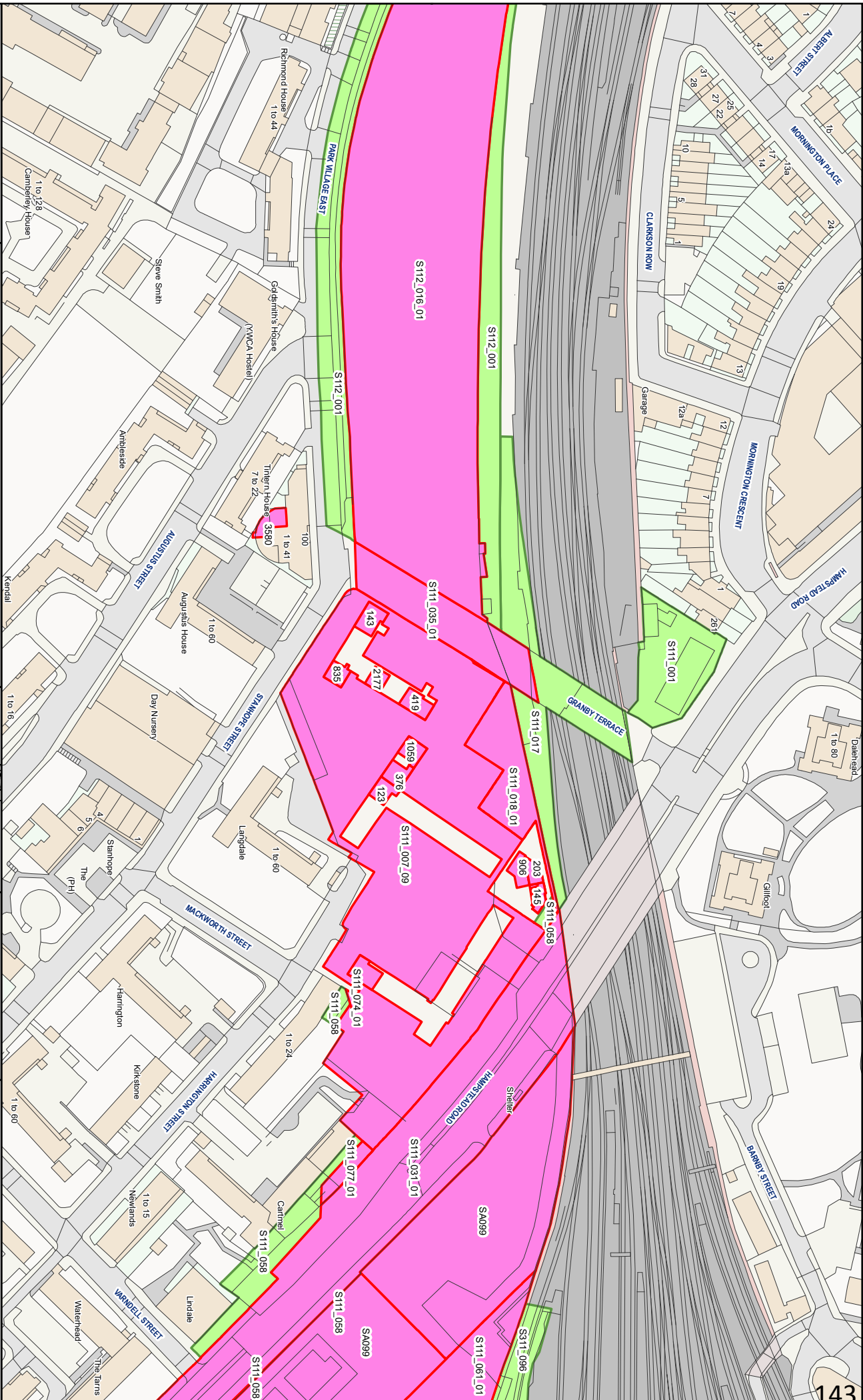
HS2

HIGH SPEED TWO INJUNCTION MAPPING

PHASE 2A KEY PLAN

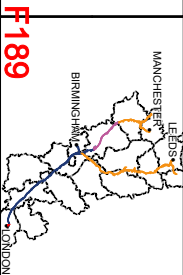
- Individual Key Plan Splits
- Connection
- HS2 Depot
- HS2 Station
- Route on surface
- Route in tunnel
- Route in green tunnel
- County boundary
- Local Authority boundary





Legend

- SOS Permanent Possession Land/ HS2 Acquired Land
- Temporary Possession Land S15/S16



High Speed Two
Phase One/Phase 2A
Injunction Mapping

Map Number:
3

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Internal

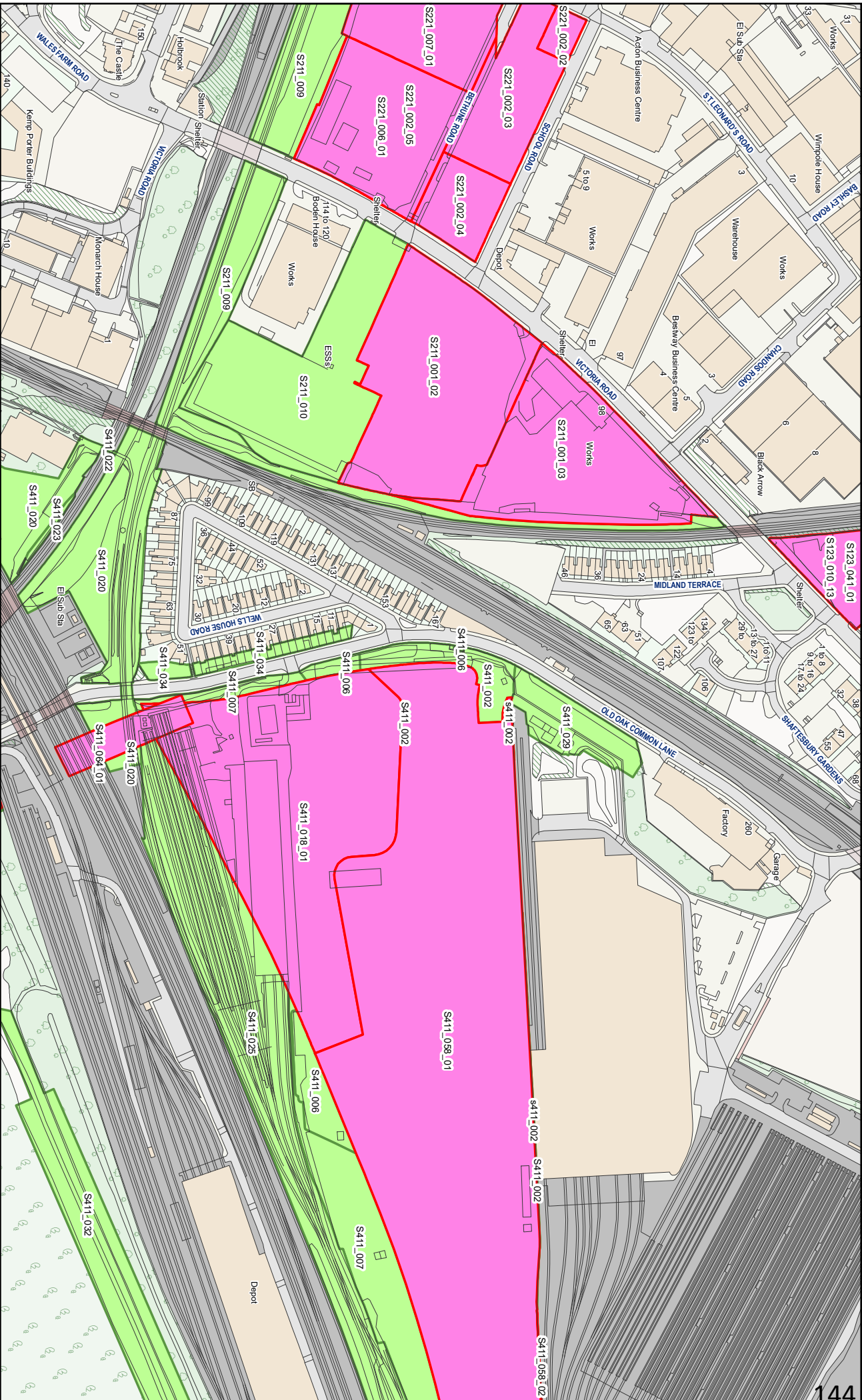
HS2

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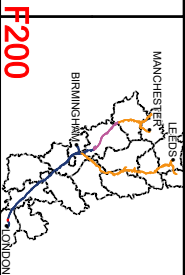
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Date: 22/04/22



Legend

- SOS Permanent Possession Land/ HS2 Acquired Land
- Temporary Possession Land S15/S16



High Speed Two
Phase One/ Phase 2A
Injunction Mapping

Map Number:
13

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Internal

HS2

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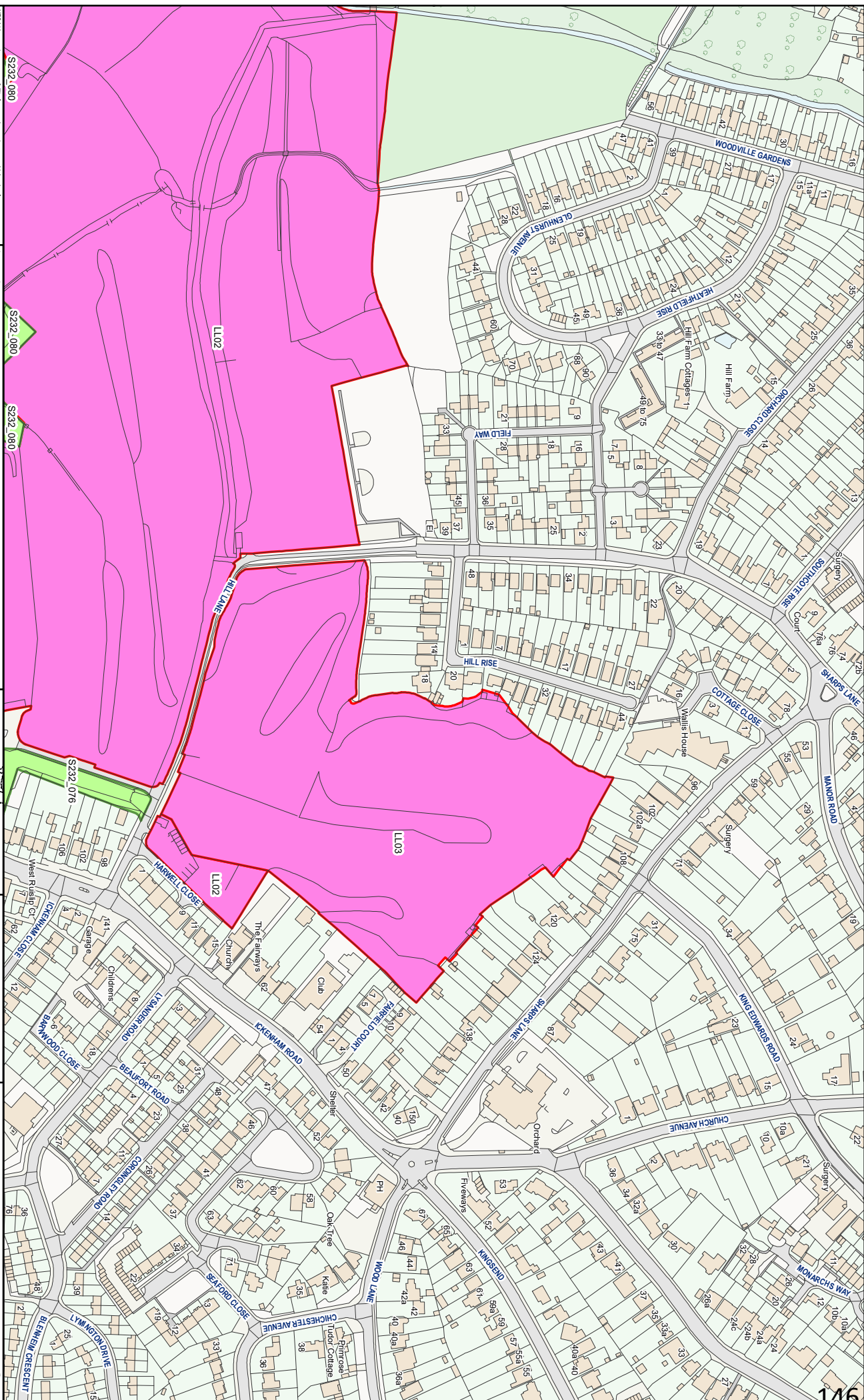
Doc Number: PH1-HS2-LP-MAP-000-000085

Date: 22/04/22

Registered in England. Registration number: 06719166.
Registered office: 2 Broadwalk, Queensway, Birmingham B1 6DA.



0 20 40 Meters

North arrow pointing up.



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Legend

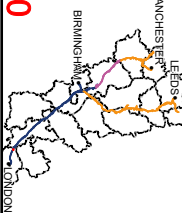
-  SOS Permanent Possession Land/ HS2 Acquired Land
-  Temporary Possession Land S15/S16

High Speed Two
Phase One/ Phase 2A
Injunction Mapping

Map Numbers:

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F220



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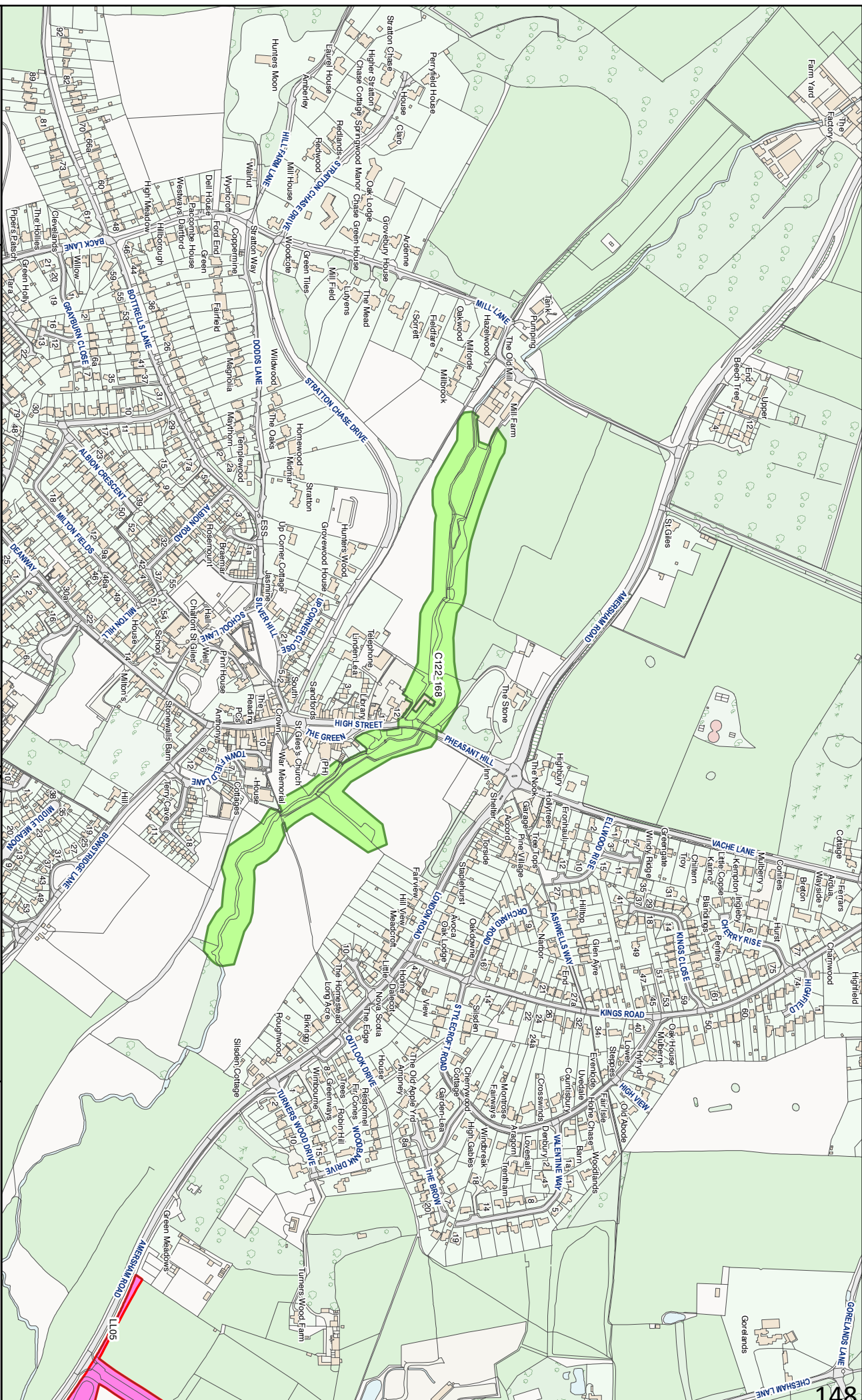
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Doc Number: PH1-HS2-LP-MAP-000-000085

Date: 22/04/22

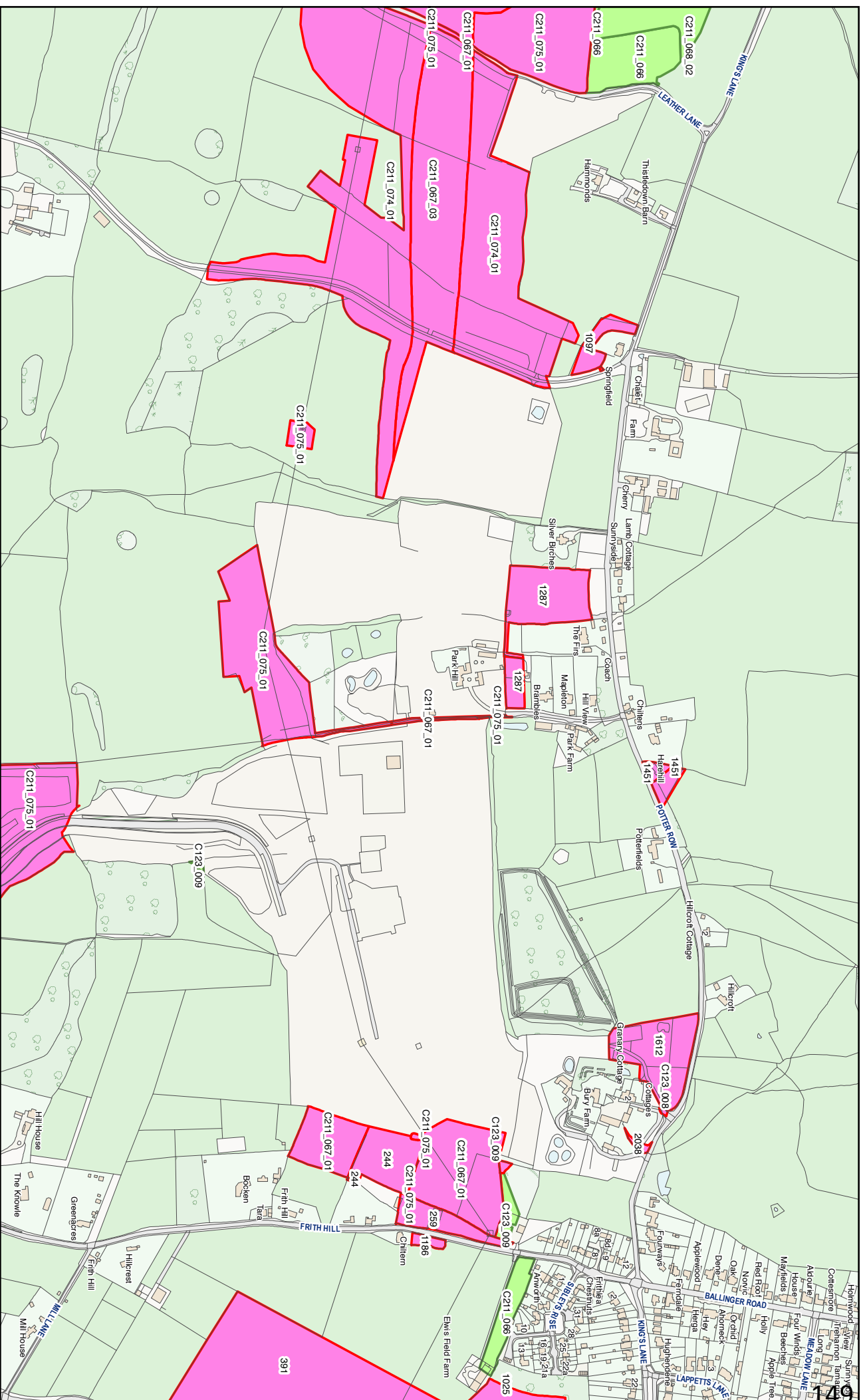


Legend

- SOS Permanent Possession Land/ HS2 Acquired Land
- Temporary Possession Land S15/S16

 SOS Permanent Possession Land/ HS2 Acquired Land
 Temporary Possession Land S15/S16

 Temporary Possession Land S15/S16



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Legend

 SOS Permanent Possession Land/ HS2 Acquired Land

 Temporary Possession Land S15/S16

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Legend

-  SOS Permanent Possession Land/ HS2 Acquired Land
-  Temporary Possession Land S15S16

High Speed Two Phase One/Phase 2A Injunction Mapping
Map Number: 42
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HSS

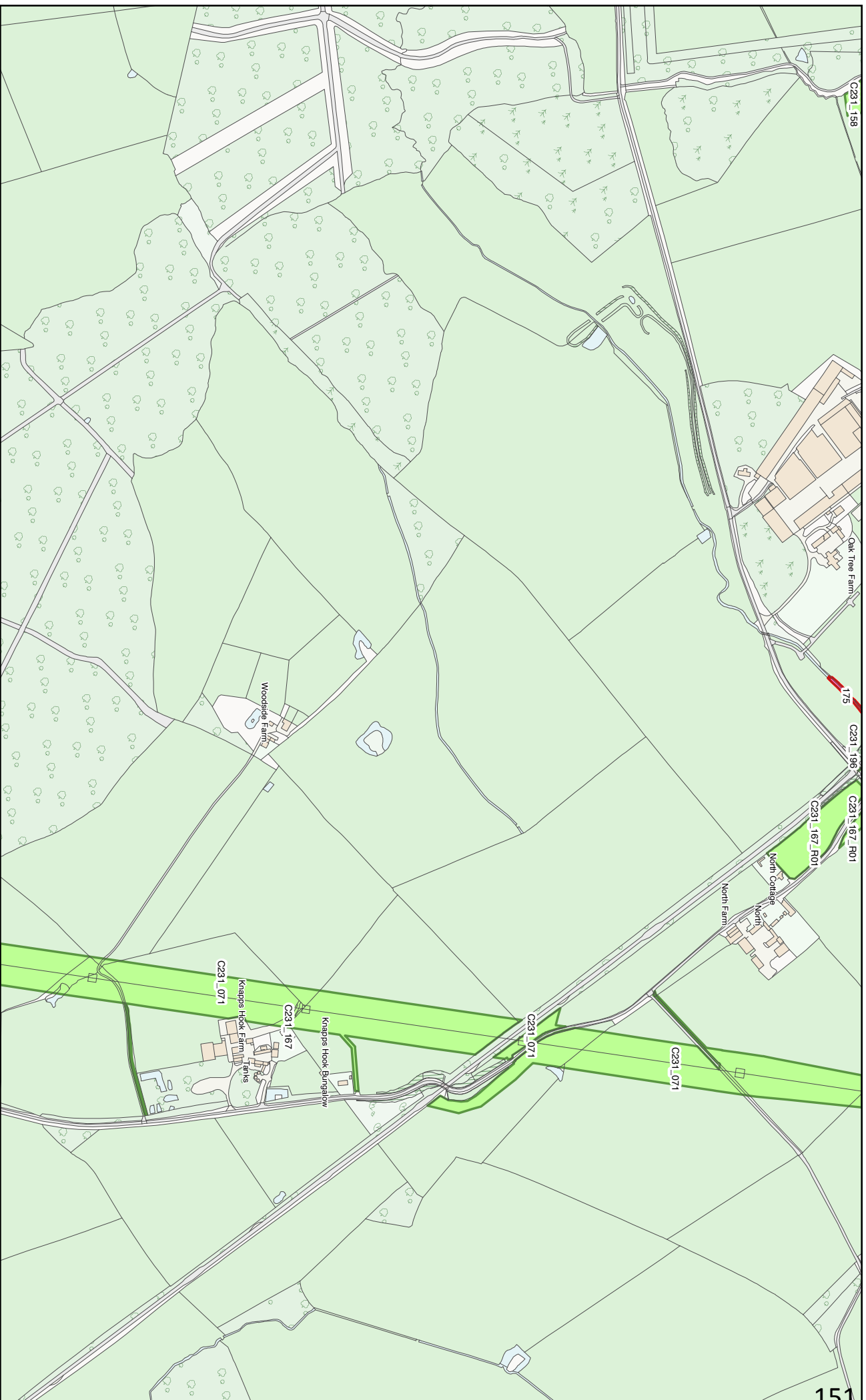
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Designed by T. J. Gaudin, Transportation Research Board
Prepared under contract to Strategic Planning Division by KSA



Doc Number: PH-1-HS2-LP-MAP-000-000085


Date: 22/04/22

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Meters



Legend
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 SOS Permanent Possession Land/ HS2 Acquired Land
 Temporary Possession Land S15/S16

 Temporary Possession Land S15/S16

MANCHESTER



High Speed Two
Phase One/ Phase 2A
Injunction Mapping

Phase One/ Phase 2A Injunction Mapping

Phase One/ Phase 2A Injunction Mapping

Map Numbers

57-L1

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IS2

Scale at A3: 1:5,000

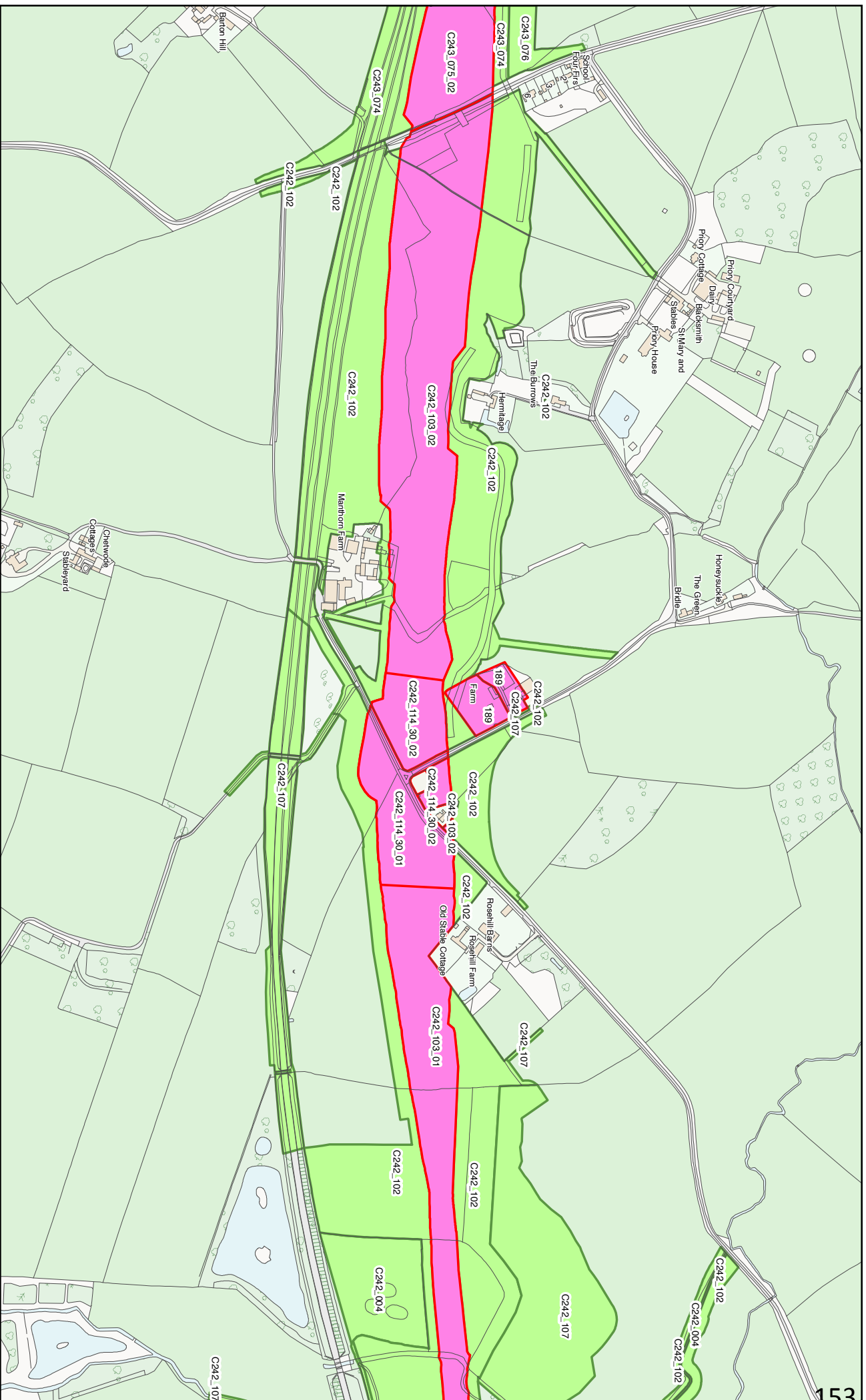


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1

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Legend

 SOS Permanent Possession Land/ HS2 Acquired Land

 Temporary Possession Land S15/S16

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Legend

-  SOS Permanent Possession Land/ HS2 Acquired Land
-  Temporary Possession Land S15S16

A map of the F065 rail route, which is a direct service from London to Leeds. The route is shown as a blue line starting from London, passing through Birmingham and Manchester, and ending in Leeds. The route is labeled 'F065' in red text at the top left. The cities 'LONDON', 'BIRMINGHAM', 'MANCHESTER', and 'LEEDS' are marked along the route. The map also shows other regional rail lines in orange and grey.

<p>High Speed Two Phase One/Phase 2A Injection Mapping</p>
<p>Map Number: 63</p>
<p>Page 102 of 277 <i>Internal</i></p>

HSS2

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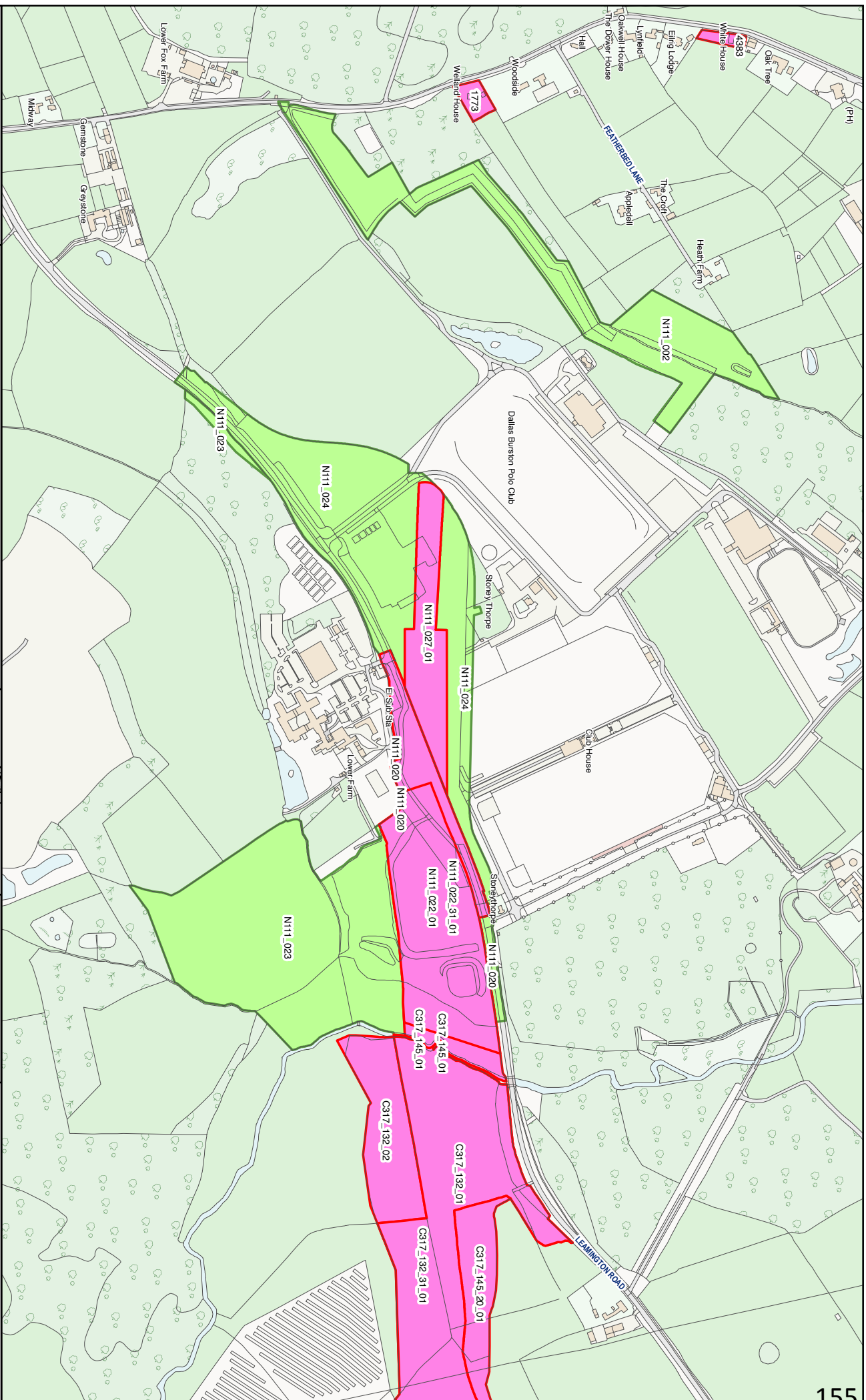
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Doc Number: PH1-HSS2-LP-MAP-000-000085

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Infrastructure for the Department of Planning and
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Legend

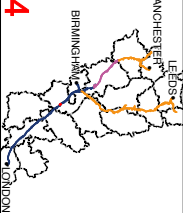
-  SOS Permanent Possession Land/ HS2 Acquired Land
-  Temporary Possession Land S15/S16

High Speed Two
Phase One/ Phase 2A
Injunction Mapping

Map Number:

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IS

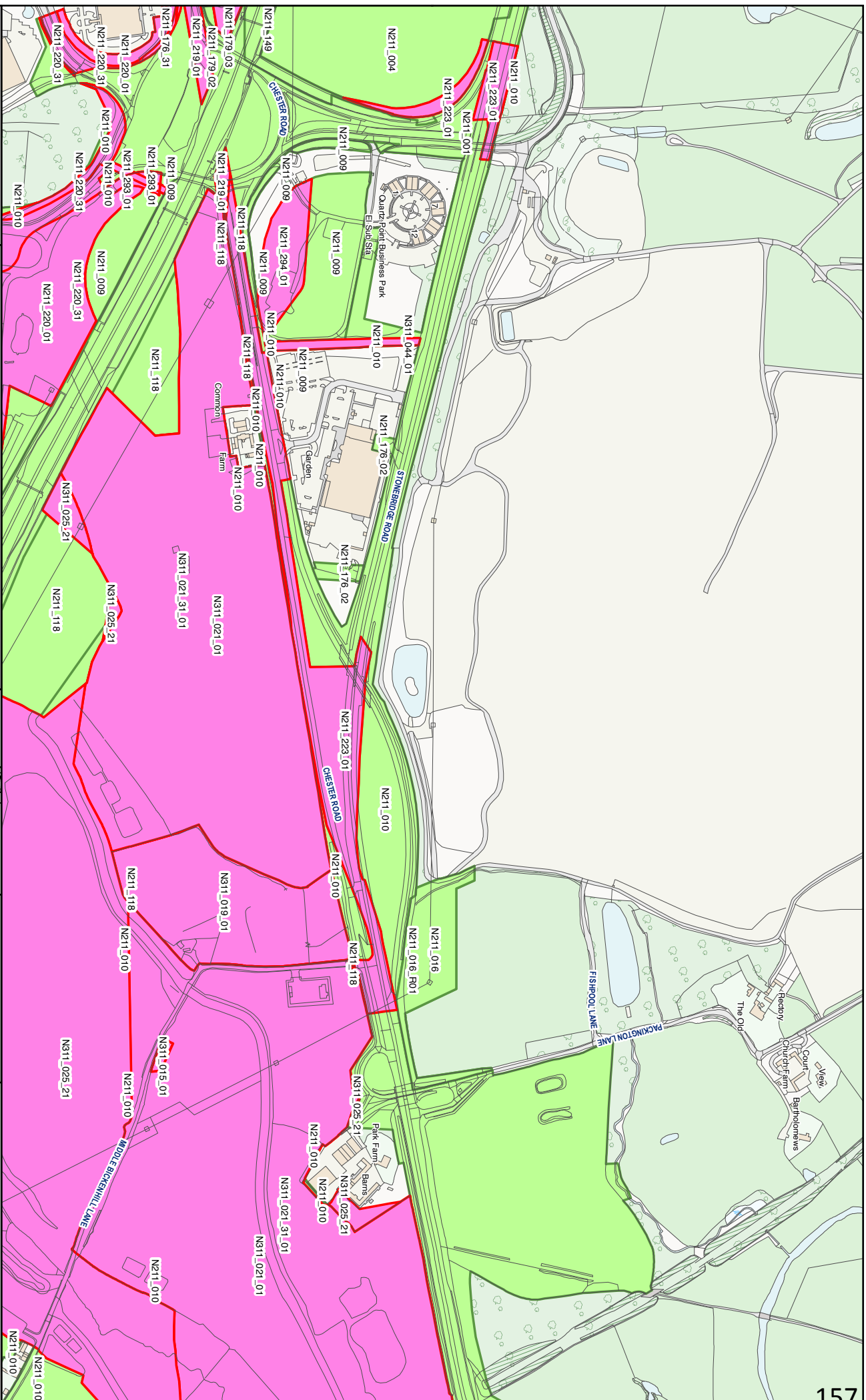
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Legend

-  SOS Permanent Possession Land/ HS2 Acquired Land
-  Temporary Possession Land S15/S16

LEEDS
MANCHESTER

High Speed Two
Phase One/ Phase 2A
Injunction Mapping

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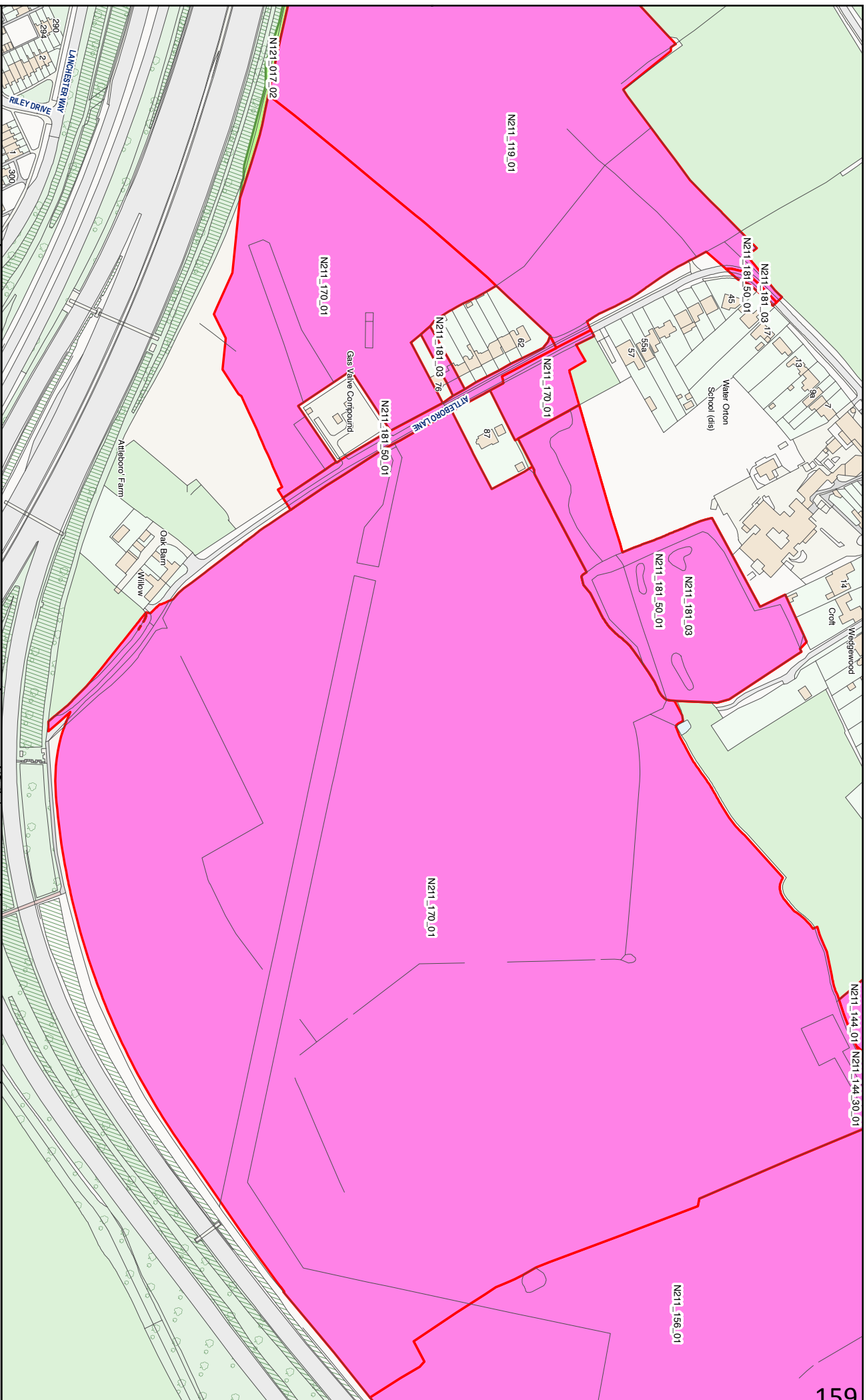
Date: 22/04/22

F135



Internal

Doc Number: PH1-HS2-LP-MAP-000-000085

Date: 22/04/22



Legend

-  SOS Permanent Possession Land/ HS2 Acquired Land
-  Temporary Possession Land S15/S16

High Speed Two
Phase One/ Phase 2A
Injunction Mapping

Map Number:

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ISN

Scale at A3: 1:2,500



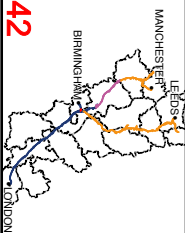
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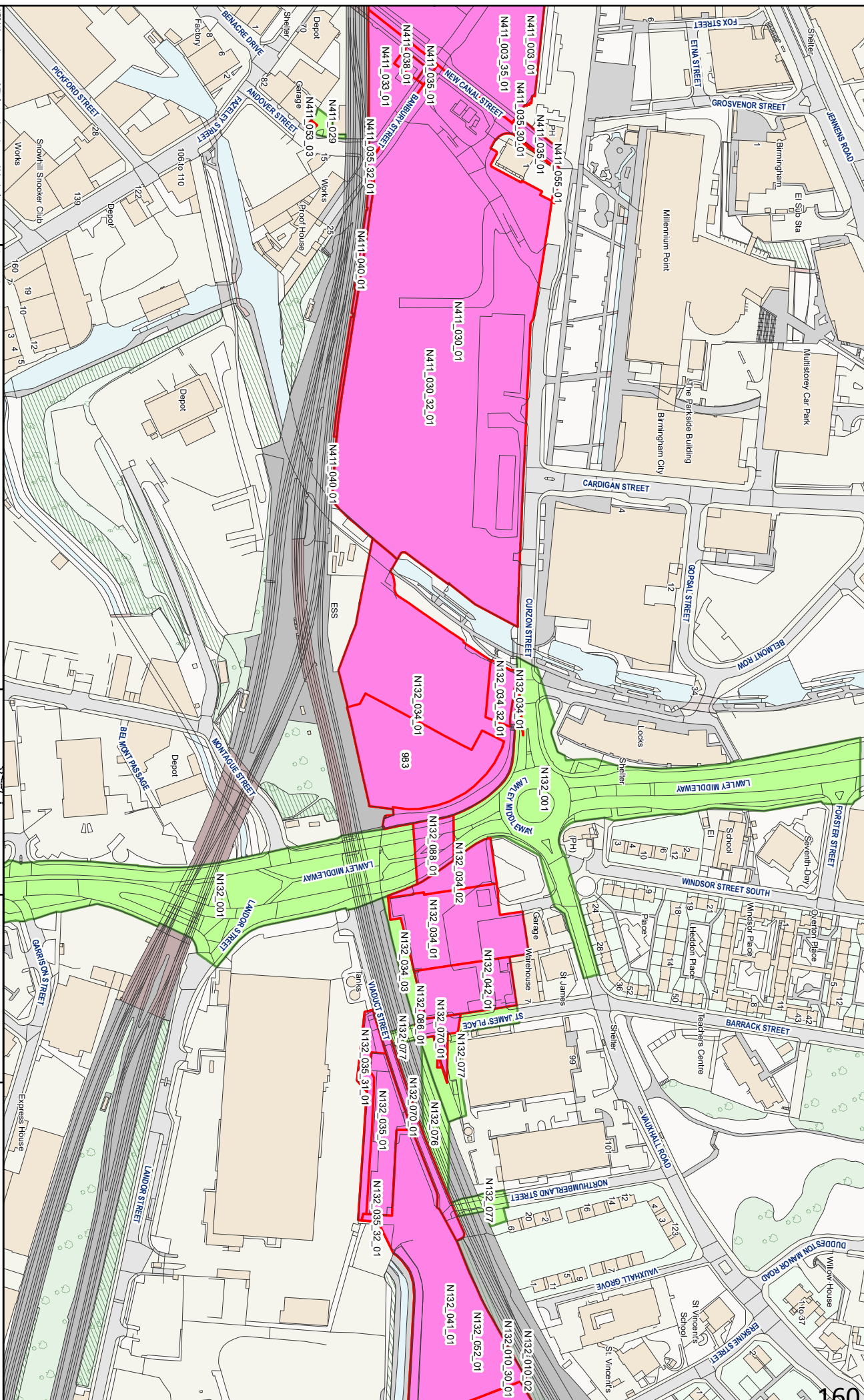
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Date: 22/04/22

F142





Legend

- SOS Permanent Possession Land/ HS2 Acquired Land
- Temporary Possession Land S15/S16

High Speed Two
Phase One/ Phase 2A
Bijunction Mapping

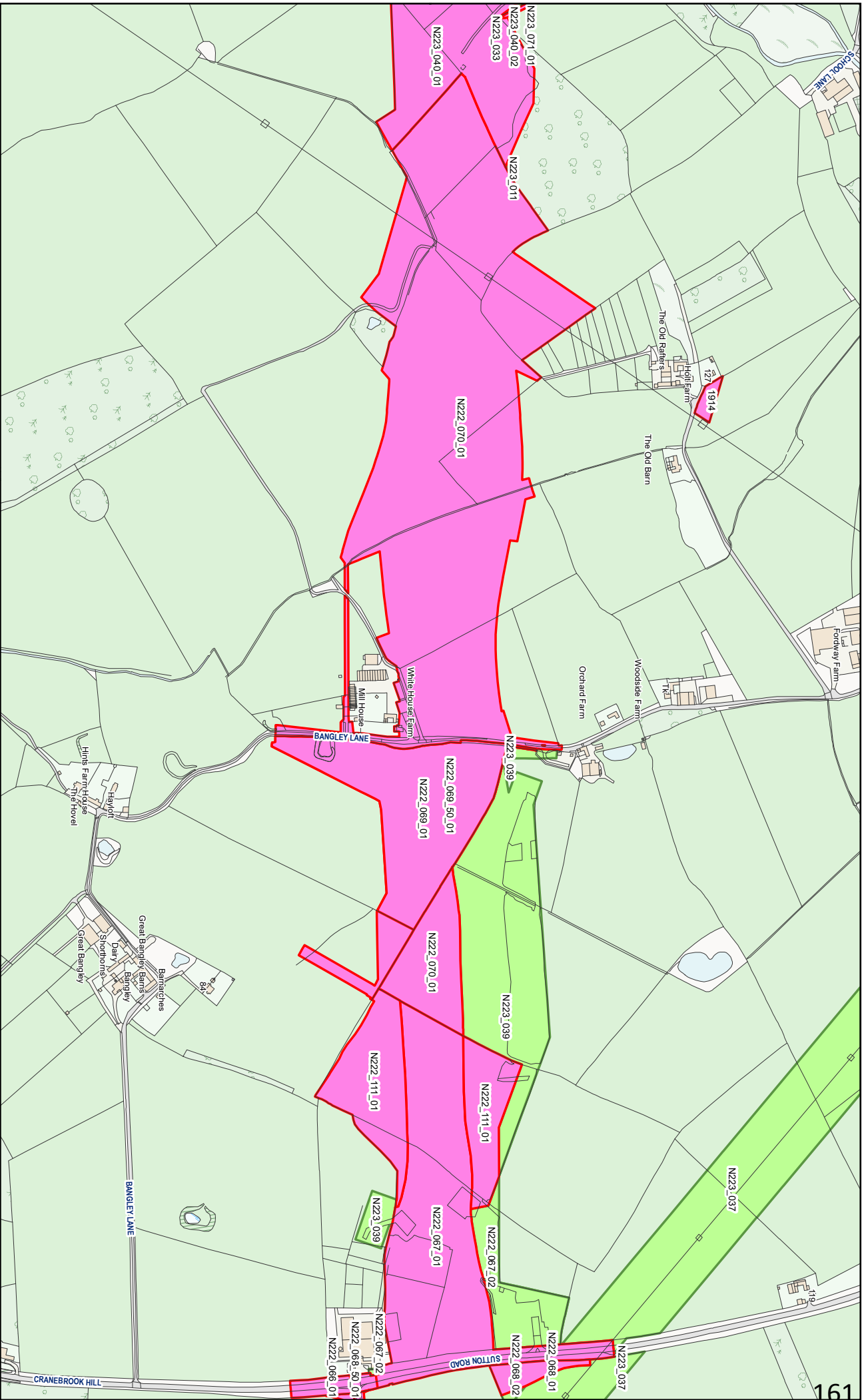
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Scale at A3: 1:2,500

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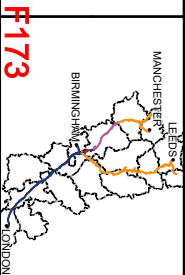
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Legend

- SOS Permanent Possession Land/ HS2 Acquired Land
- Temporary Possession Land S15/S16

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High Speed Two
Phase One/ Phase 2A
Injunction Mapping

Map Number:
129

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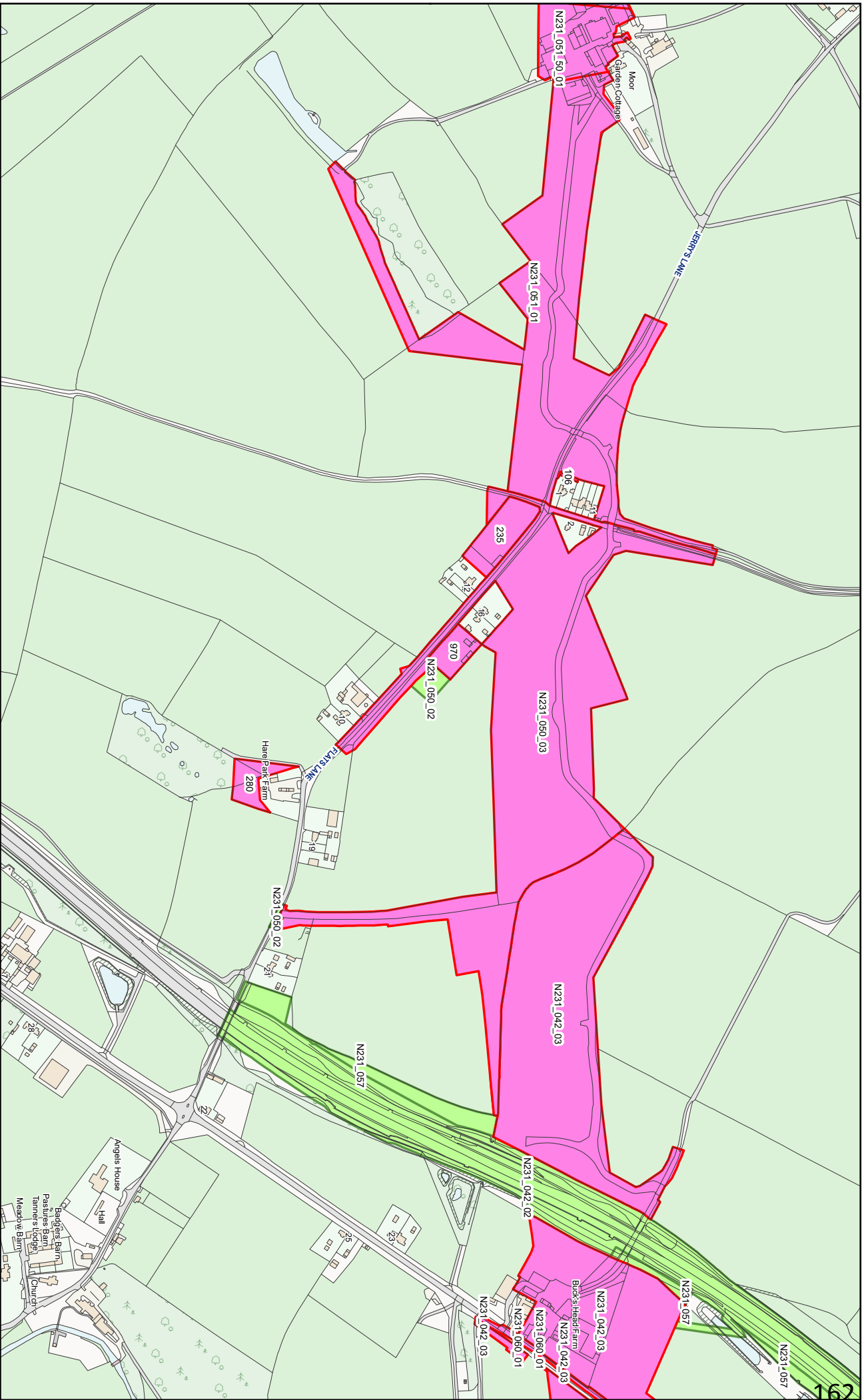


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Legend

SOS Permanent Possession Land/ HS2 Acquired Land

Temporary Possession Land S15/S16

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MANCHESTER
LEEDS
BIRMINGHAM
LONDON

High Speed Two
Phase One/ Phase 2A
Injunction Mapping

Map Number:
131

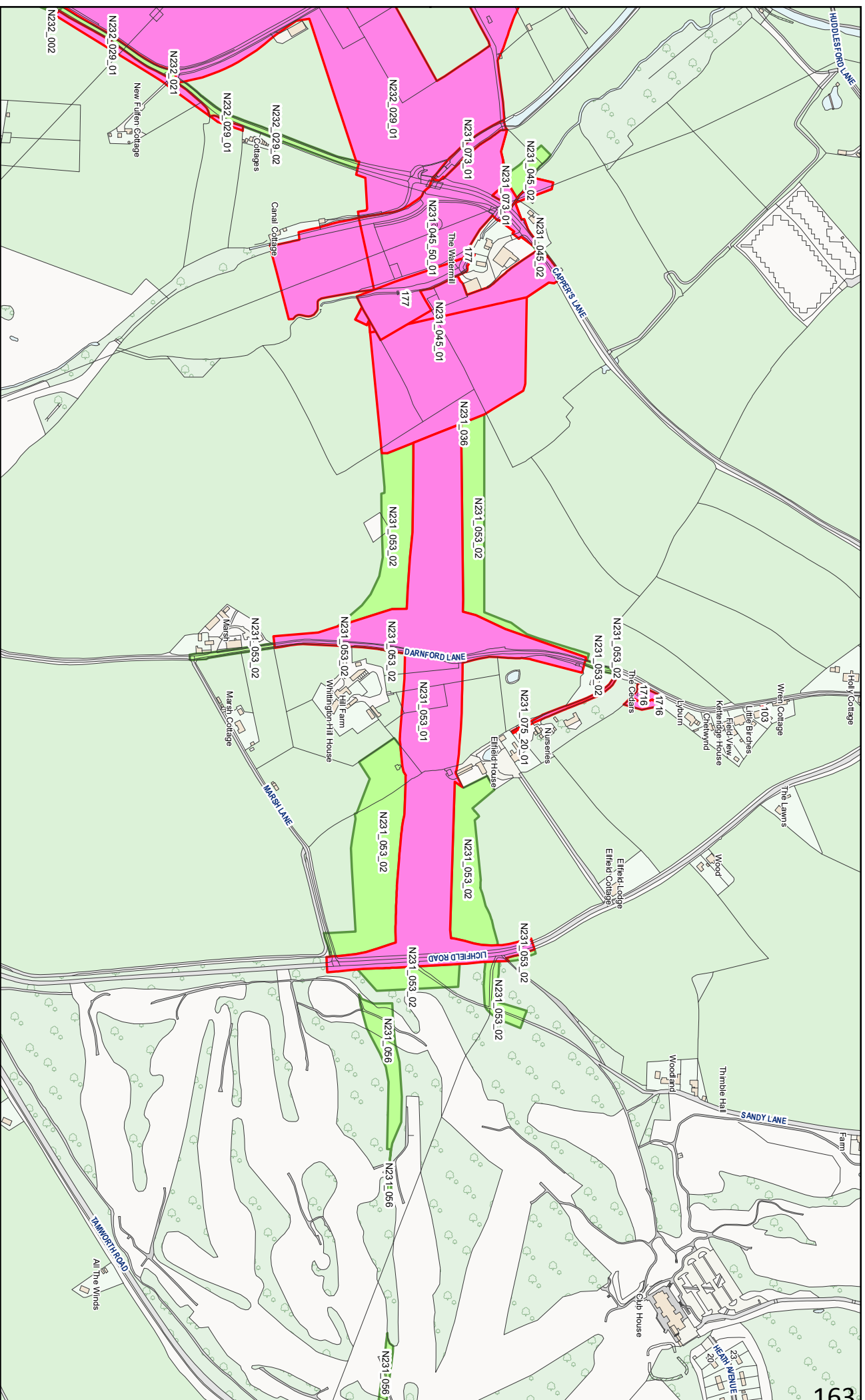
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Legend

-  SOS Permanent Possession Land/ HS2 Acquired Land
-  Temporary Possession Land S15/S16

High Speed Two
Phase One/ Phase 2A
Innovation Moving

injunctive map

13

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Inter

IS

Scale at A3: 1:5,000

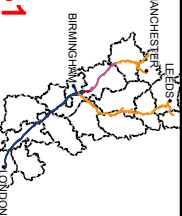


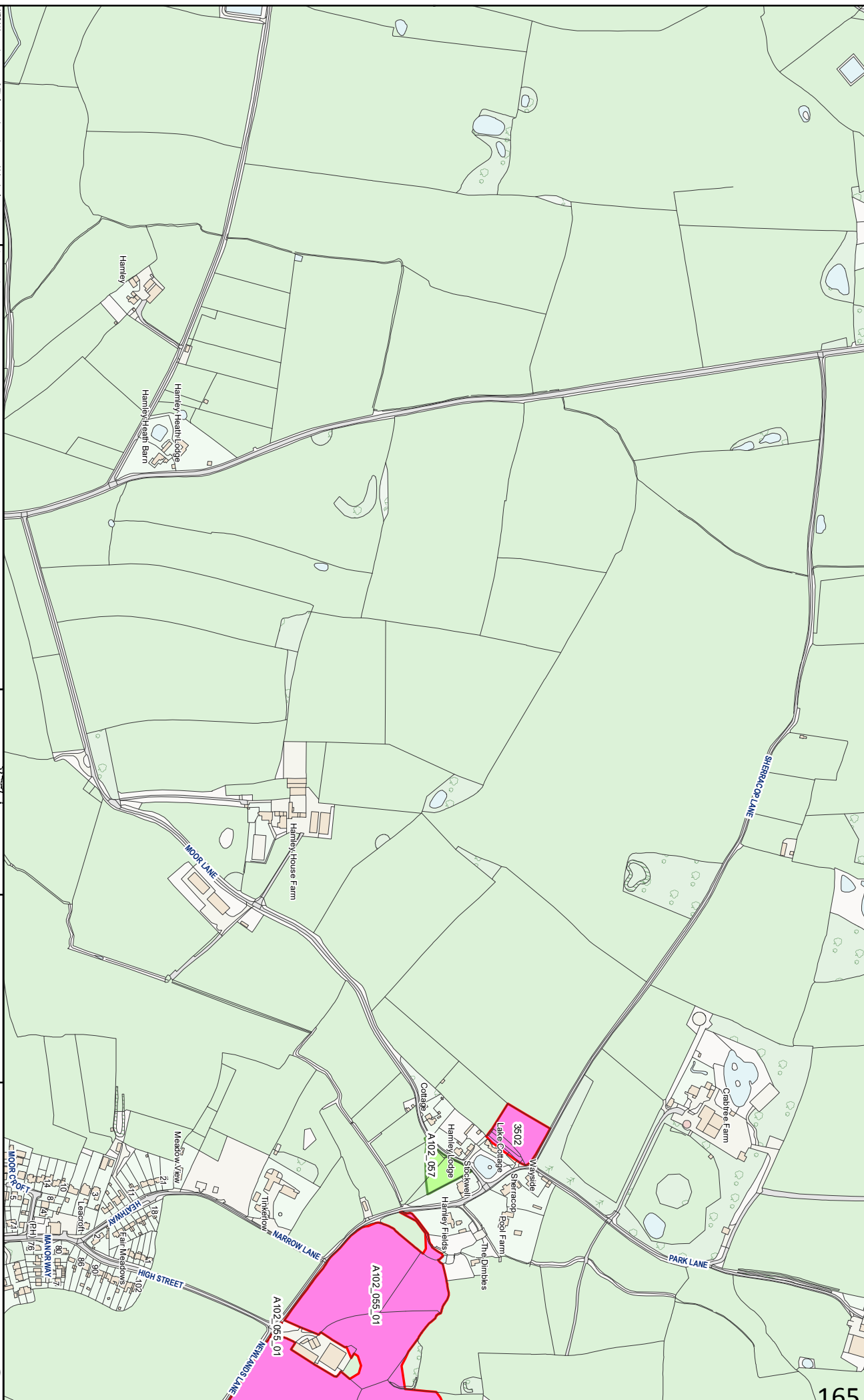
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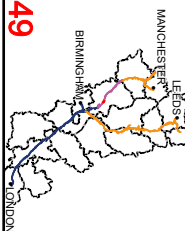
F181





Legend

- SOS Permanent Possession Land/ HS2 Acquired Land
- Temporary Possession Land S15/S16



High Speed Two
Phase One/ Phase 2A
Injunction Mapping

Map Numbers

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IS

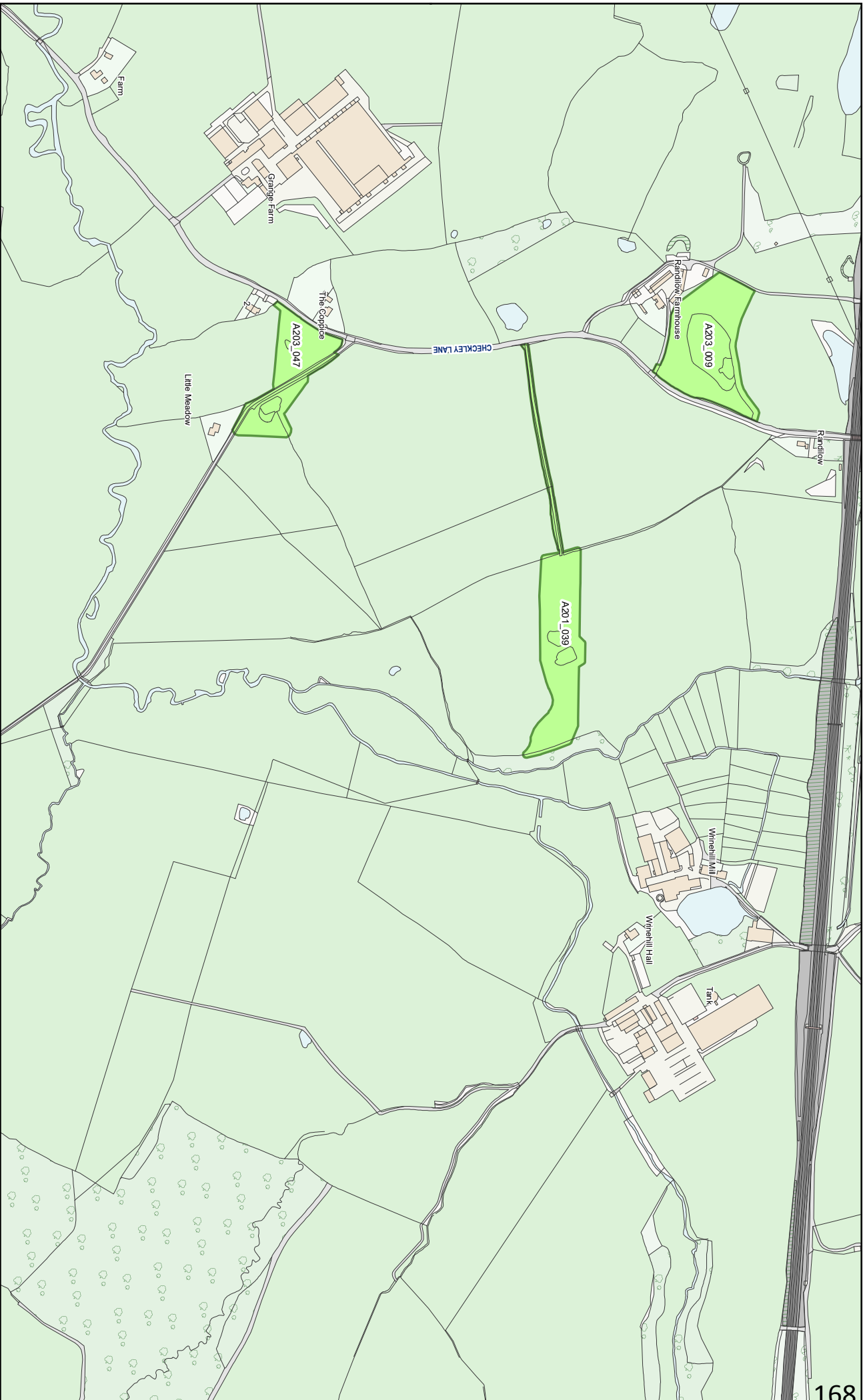
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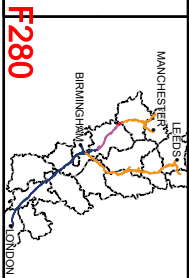
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Temporary Possession Land S15/S16

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High Speed Two
Phase One/ Phase 2A
Injunction Mapping
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