

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

**ORIGINAL APPLICATION DOCUMENTS BUNDLE (MARCH 2022)
(Volume B) (Part 1)**

not intended for reading at the hearing on 16 May 2023

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5	Exhibit JAD3	ORIG-B-282 to ORIG-B-444
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Reference: RXS/380900/401**

Solicitors for the Claimant

On behalf of: Applicants/Claimants
R.Jordan
1st statement of witness
Exhibits: RJ1 and RJ2
Date:23 March 2022

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

Claim No. QB-2022-BHM-000044

BETWEEN:

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

Claimants

- and -

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

AND OTHERS

Defendants

**EXHIBIT RJ1
TO THE WITNESS STATEMENT OF RICHARD JOSEPH JORDAN**

The documents in this Exhibit are at:

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

ORIG-B-2

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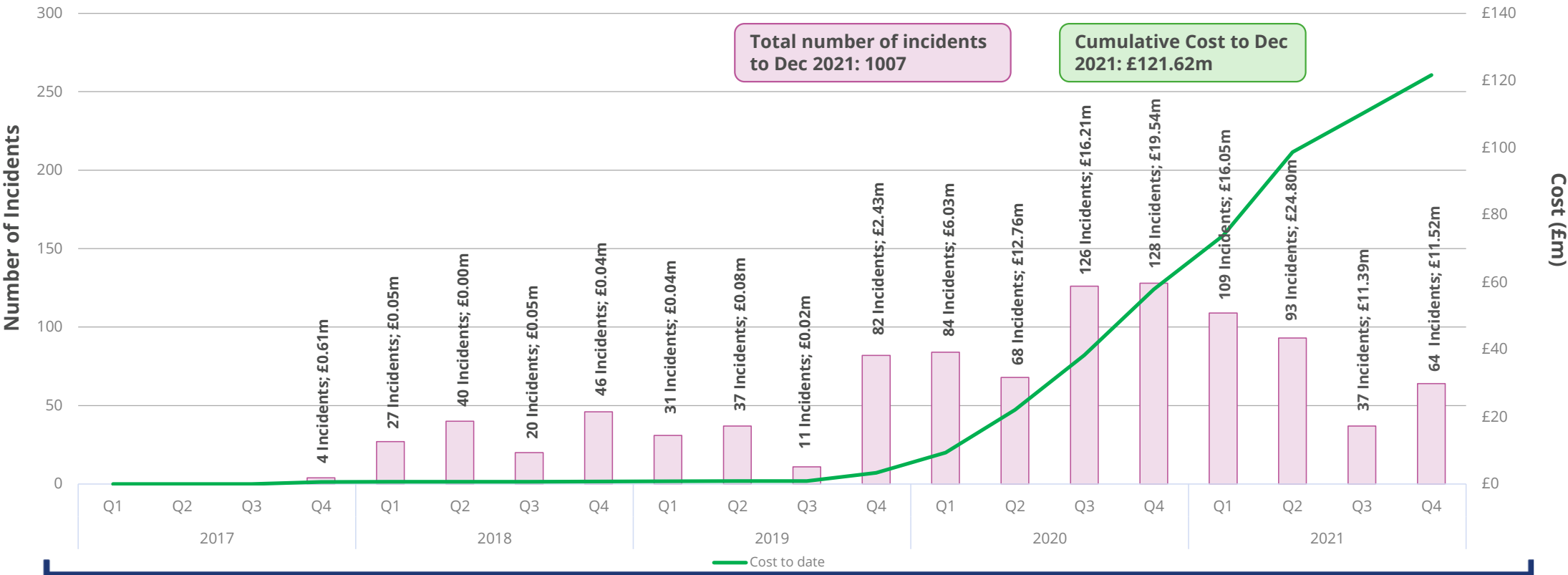
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HS2 Phase One Protestor Activity

The graph illustrates the number of incidents and the costs of protestor activity (including prolongation costs) on the HS2 Phase One up to Dec 2021

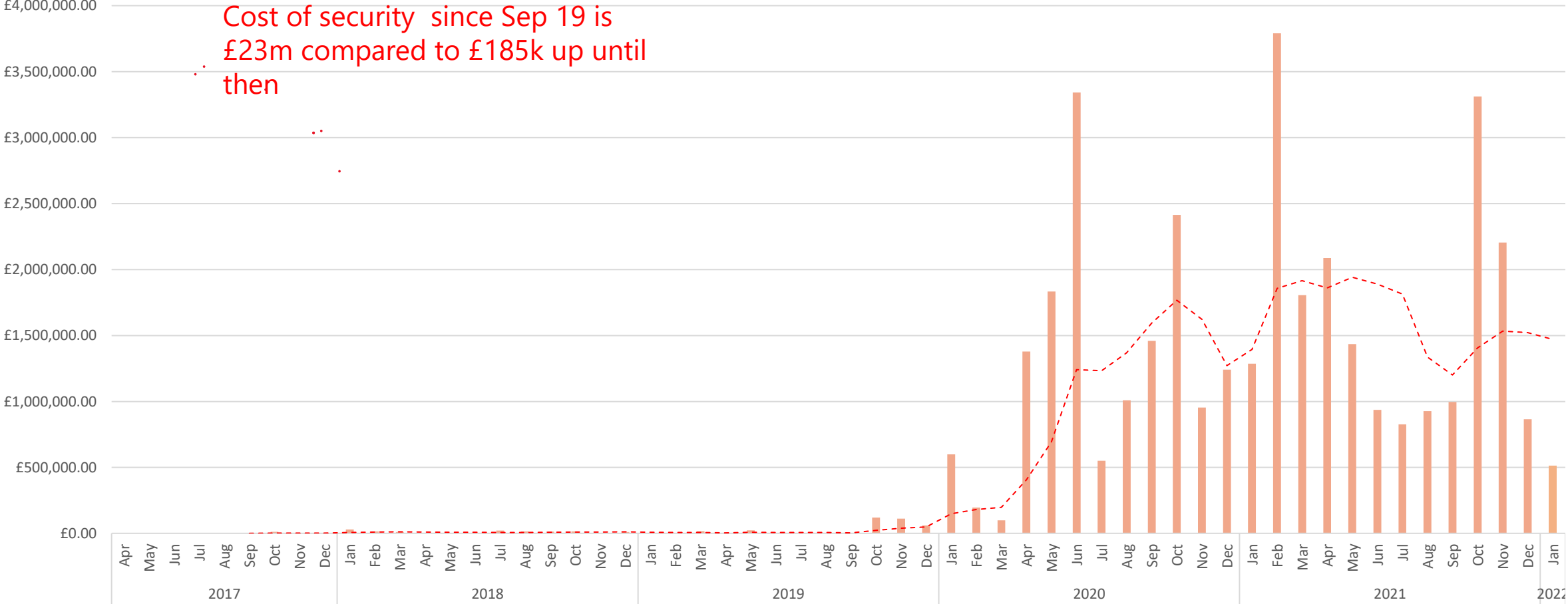


Total number of incidents to Dec 2021: 1007

Cumulative Cost to Dec 2021: £121.62m

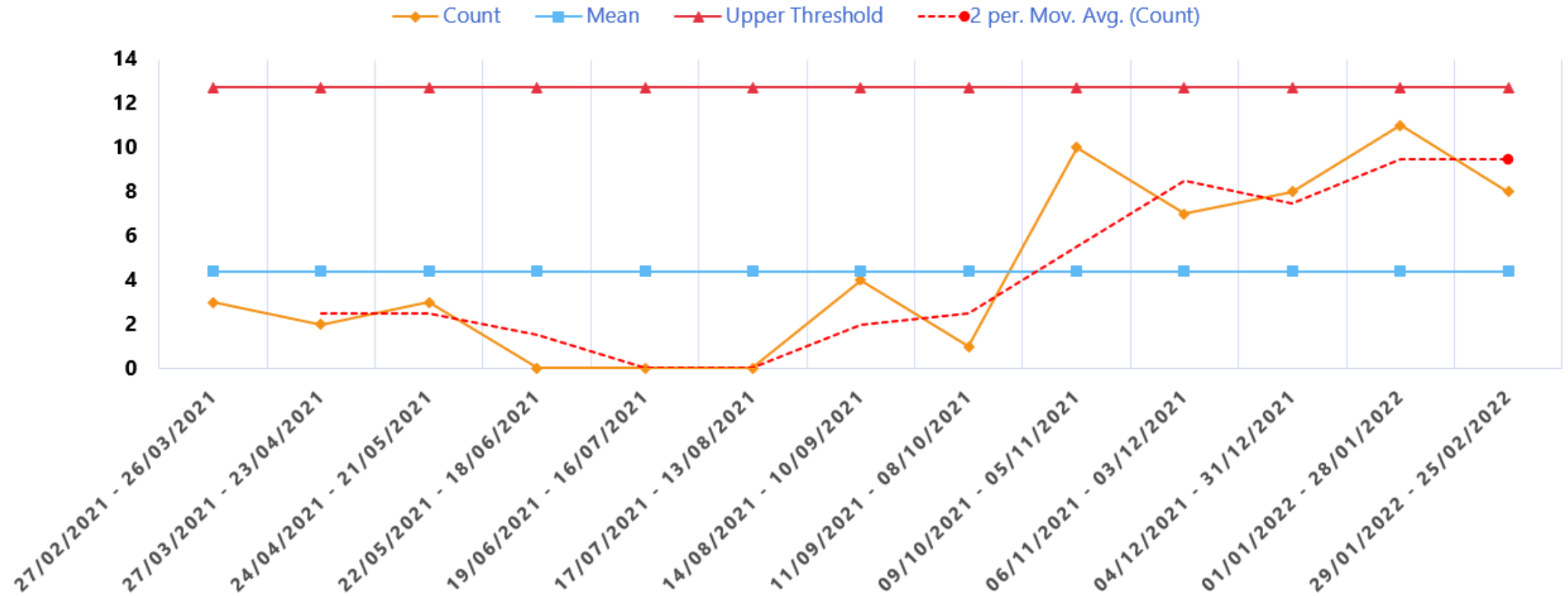
Note: All costs are current prices at time of impact. Within the Costs to Dec 2021, 72% are actuals and 28% are forecast.

HS2 Ltd Security Spend



Phase 2A

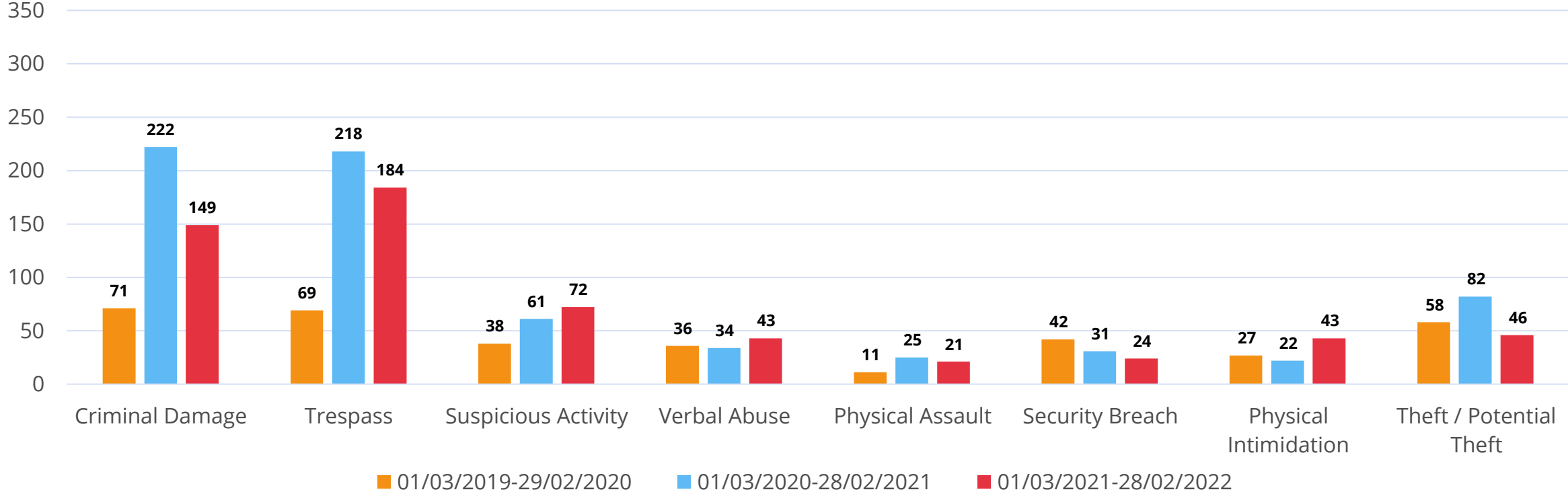
Threshold Chart Showing Incidents in the Current 28-Day Period Compared to the Previous 12 Periods



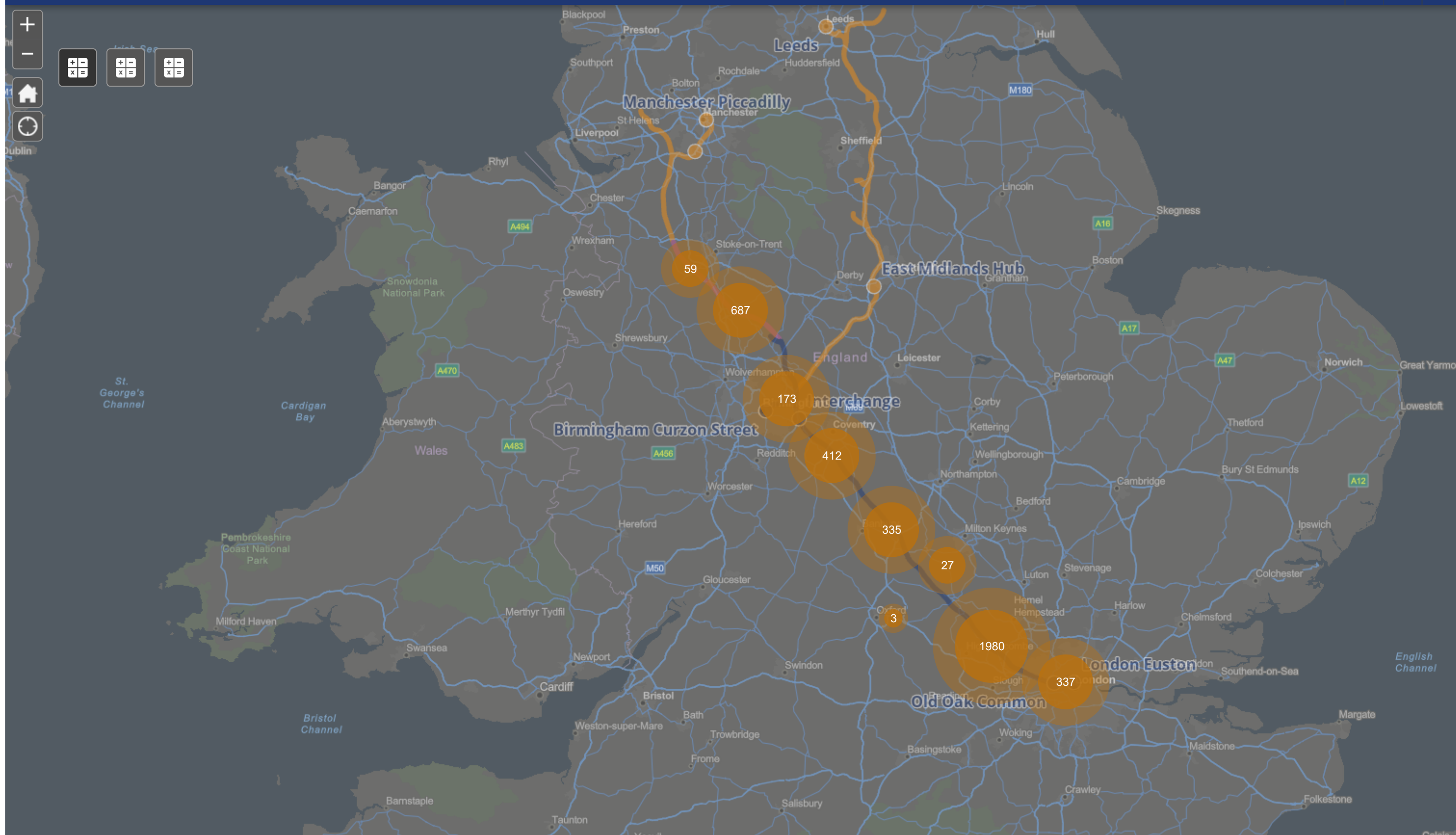
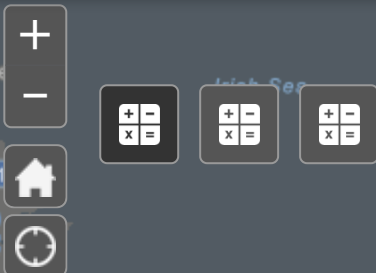
Escalation of Violence and Crime

Comparison of 12-month periods from 1 March 2019 to 28 February 2022 inclusive

Assessed crime and security related incidents against HS2 recorded on Horace by type from 01/03/2019



RESTRICTED - Security Control Risk Operations



Count of Control Risk Reports

4,013

Summary Physical Security Reports

Filter All

Legend

Global Injunction Incidents Location

- 6 A41 Aylesbury
- Bowood Lane
- 11 Capper's Lane
- Cash's Pit Land, Swynnerton
- 3 Chiltern tunnel portal
- 9 Crackley & Cubbington Wood
- 2 Denham Country Park
- 7 Edgecton
- Euston Square Gardens
- Gawcott Road, Calvert
- Harvil Road
- Jones Hill Wood
- 4 Leather Lane
- 10 M42
- 1 Podium, 1 Eversholt Street
- 8 Poor's Piece
- 5 Small Dean
- 12 Swynnerton Cadent Works

HS2 route alignment

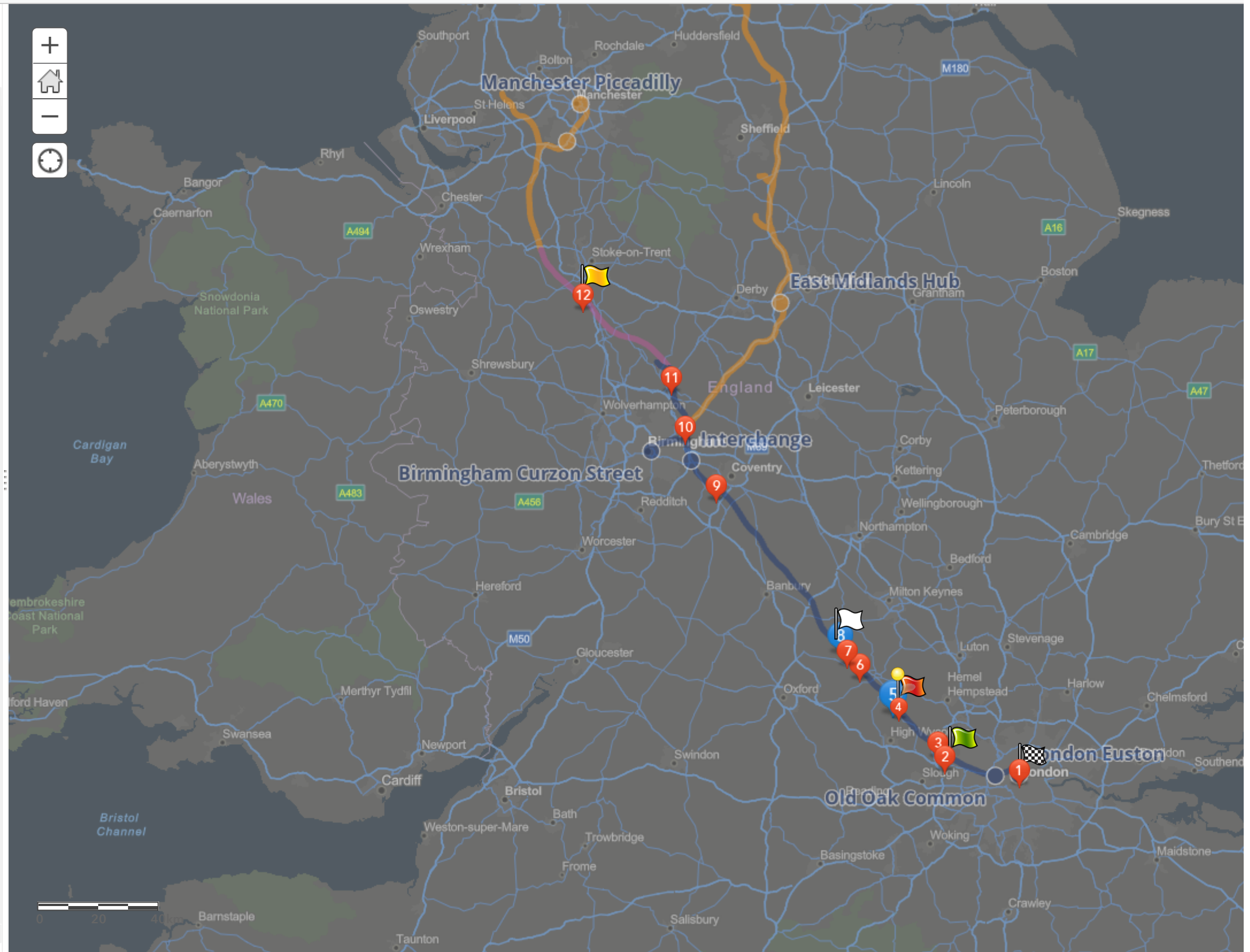
Destinations Served by HS2

HS2 Stations

- Phase One Station
- Phase 2b Station

Phase 1 route

Phase 1 High Speed route



EXAMPLES OF THREATS MADE AGAINST THE HS2 SCHEME

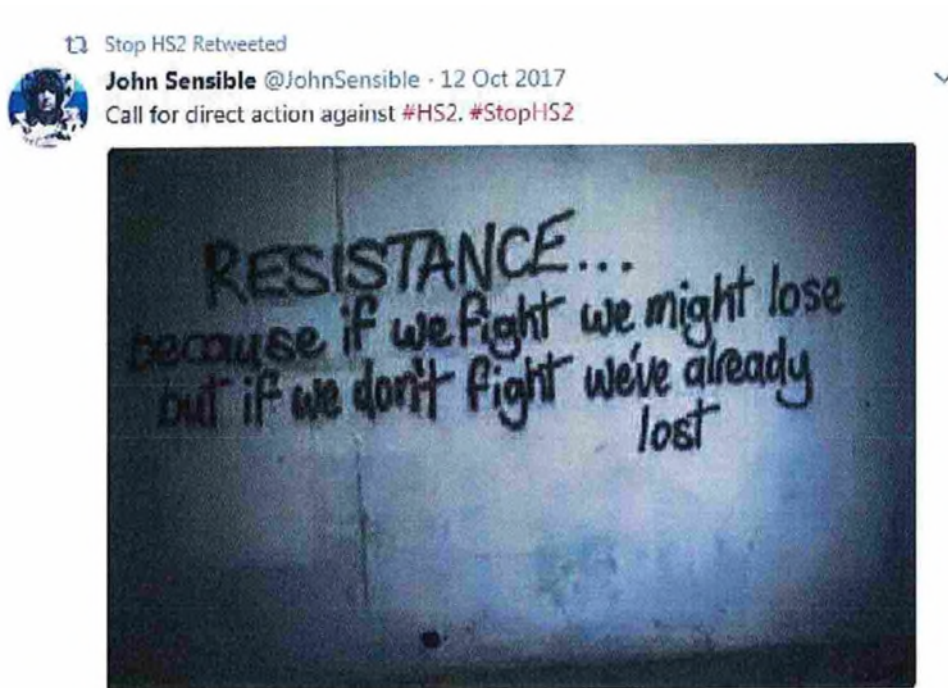
Video called "lockon1" taken on 10 October 2017 and uploaded to YouTube by group calling themselves "Utopian Bohemians": <https://youtu.be/3-kPGfdULDo?list=PLm3tQ5n8ftZJUXzEba-I4InYy484sx7L2>



D38 says (55 seconds into the video):

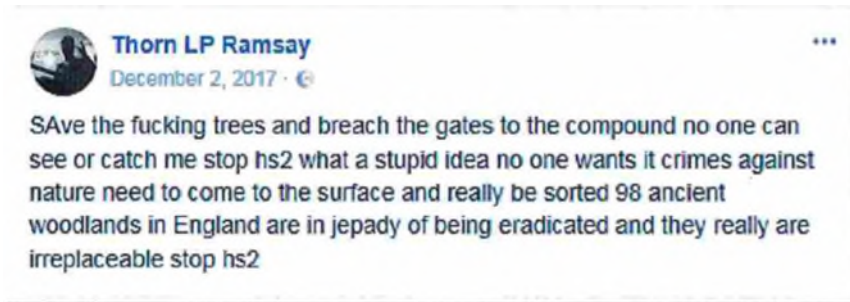
"It is quite funny that the police don't want to come in because as long as we not evicted properly by police we can come in and out whenever we like and stop the works again and again and again and again..."

Twitter, 12 October 2017:



Facebook post by D37 on 02/12/2017

(<https://www.facebook.com/thorn.ramsay/posts/10214384361380225>):



Thorn LP Ramsay
December 2, 2017 · 🌐

SAve the fucking trees and breach the gates to the compound no one can see or catch me stop hs2 what a stupid idea no one wants it crimes against nature need to come to the surface and really be sorted 98 ancient woodlands in England are in jepady of being eradicated and they really are irreplaceable stop hs2

Facebook post by D36 on 5/01/2018:



Mark Keir
January 5 at 10:12pm · 🌐

Let loose hell on HS2! dm me ASAP!

👍 Like 💬 Comment ➦ Share

👍 5

3 Shares

Nick Smith Let us know what you have in mind asap we are building an army in Euston camden area and can pass on your messages instantly

Like · Reply · 3w

Write a comment... 😊 📷 GIF 🗨️

Press Enter to post.

Video taken by D36 on 11 January 2018 and posted on Facebook

(<HTTPS://WWW.FACEBOOK.COM/MARKKEIR77/VIDEOS/1778311765534443>):



D36 described how two other activists had entered the comp

ound on HS2 Land. At 28 seconds into the video he said: *“Anything we can do to slow them up and stop them”* and then laughed.

<https://www.theguardian.com/environment/2021/feb/13/hs2-tunnel-protest-first-many-activist-lazer-sandford>

HS2 tunnel protest will be first of many, says activist

Lazer Sandford says subterranean tactics are likely to feature in new wave of climate emergency protests



📷 Lachlan Sandford, 20, known as Lazer, spent 12 days in secret tunnels under Euston Square Gardens in central London. Photograph: Aaron Chown/PA

Diane Taylor

Sat 13 Feb 2021 08:00 GMT



An environmental activist who spent 12 days in a tunnel network underneath Euston Square Gardens in central **London** says the protest is likely to be the first of a new wave against the climate emergency using subterranean tactics.

Speaking exclusively to the Guardian in his first interview since leaving the tunnel network on 6 February, Lachlan Sandford, 20, known as Lazer, said the protest to raise awareness about the environmental destruction that activists believe the high-speed rail link **HS2** will cause would not be a one-off.

He highlighted the construction of a second, smaller **tunnel** at Highbury Corner, also in central London, from where protesters were evicted after a few hours.

Phase 2a of HS2 connecting the West Midlands and Crewe received **royal assent** in parliament on 11 February.

Sandford's actions in the tunnel hit the headlines after he was locked to a complex steel and concrete device, which activists underground referred to as "a concrete cake". It consisted of a metal safe encased in concrete, with more concrete inside, and Sandford locked to an "arm tube". He also had a lock on his ankle.

"It was an incredibly uncomfortable and painful thing to endure," he said. "But nothing like the pain and discomfort that the climate and ecological emergency is bringing and other people around the world are already feeling."

There are seven of the original nine activists left in the tunnel, including Sandford's sister Blue Sandford, 18, Dan Hooper, known as Swampy, 47, and Swampy's 16-year-old son, Rory.

The plan was for Sandford to be the first to leave, but a 17-year-old activist left the tunnel the evening before because she was feeling unwell.

"That was my job from the start, to be the person holding the down shaft and protecting the entrance to the tunnels at the bottom. We were thinking it would only take them three days to get to me but actually it took them 11," he said.

As supporters followed news updates on the lengthy process of removing Sandford from the "lock on" - he was locked on for 30 hours and it took the bailiffs 25 hours to extract him from it - they expected the bailiffs to bring him up from the tunnel.

However, he **grabbed the lock-on** after he was released and ran back into the tunnel, evading capture by the bailiffs.

He said the decision to do that was not premeditated. "That was spur of the moment," he said. "I escaped back into the tunnels for a rest. I was pleased I got a chance to say goodbye to Blue and the others properly."



📷 Bailiffs clear the HS2 protest camp near Euston station. Photograph: Guy Bell/Rex/Shutterstock

He said he negotiated lights and other essentials for the tunnellers before leaving the tunnel voluntarily. HS2 says it provided lights but not other essentials.

The time Sandford spent in the tunnel is far from his first brush with activism. His father, Roc Sandford, is a Scottish laird who lives off grid on the small Hebridean island of Gometra, pursuing a carbon-neutral way of life. He has also been active in XR Youth.

“With my sister Blue and others, we **chained ourselves** across the entrance to a fracking conference a couple of years ago,” said Sandford. “I think it was hard for Blue to lose me from the tunnel community. I love them all dearly and I’m looking forward to when I see them again.

“The HS2 bailiffs are hardcore. They are being fairly heavy with us and it’s pretty extreme, but nothing like what is coming if we don’t get our voices heard. People of my age are not being given a choice because the government isn’t doing what’s needed and that’s when I started protesting more. We need to figure out how to get more MPs to back the climate and ecological emergency bill, there’s about 100 so far, so get on to your MP, and get them to scrap HS2 as well.”

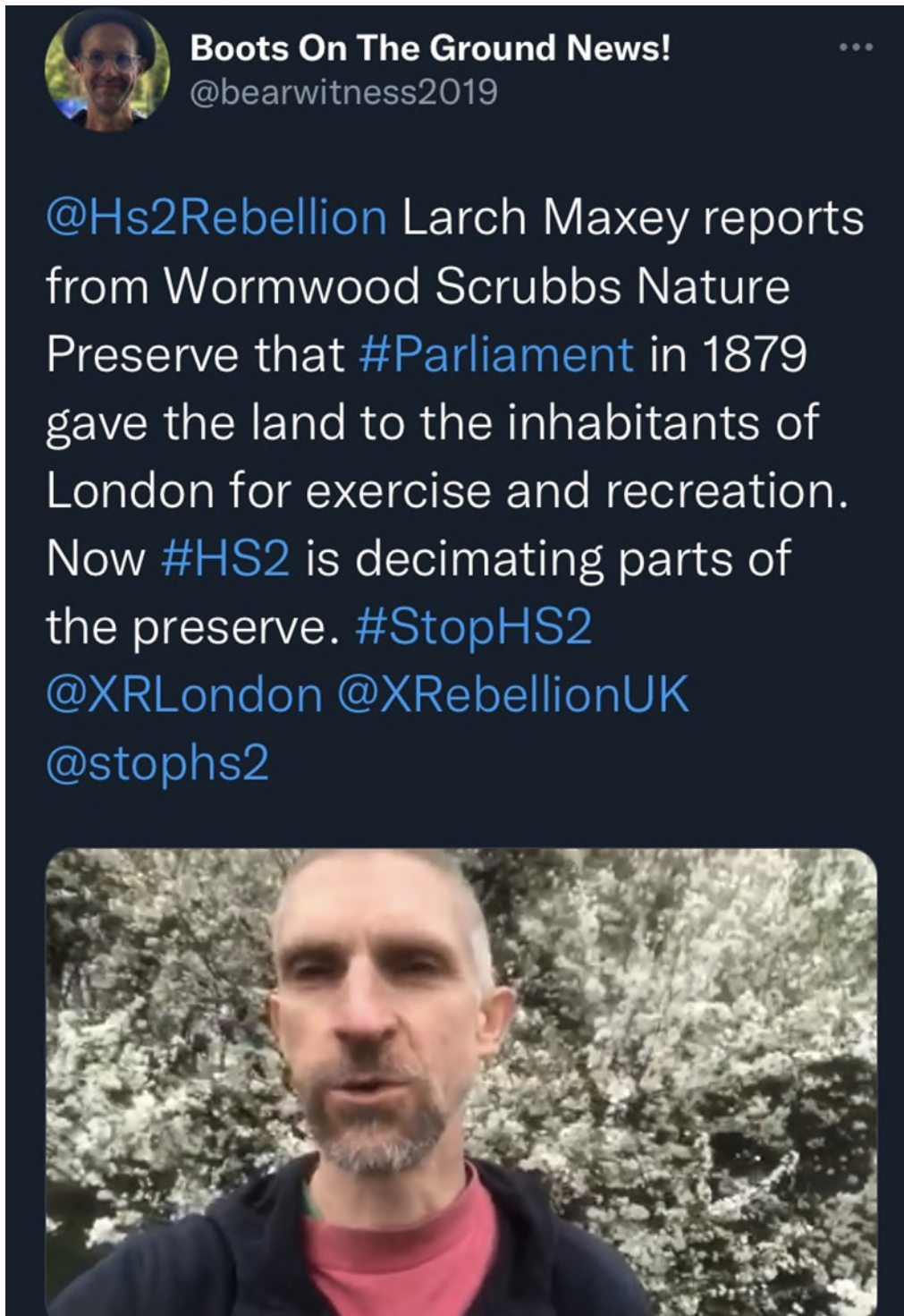
Roc Sandford said of his two children involved in the tunnel protest: “I’m so proud of them, they are standing up for what they believe in. But they shouldn’t have to, it’s too much for young shoulders like theirs to carry. We all need to help them.”

One of the first things Sandford did after leaving the tunnel was get some falafel from his favourite place in west London. But the rigours of life underground have not deterred him from environmental activism.

“I can’t divulge any of my future plans for tactical reasons, but I’m nowhere near finished with protesting,” he said.

D32 Tweet on 24.03.2021

<https://twitter.com/bearwitness2019/status/1374751791456391171?>



ORIG-B-18

D33 Facebook post 28 July 2021

<https://www.facebook.com/ElliottCuciurean>



Elliott Cuciurean

July 28, 2021 · 🌐



MAPS MAPS MAPS!!!

HS2 line and safeguarded area for phase 1 and 2a drawn over OS maps.

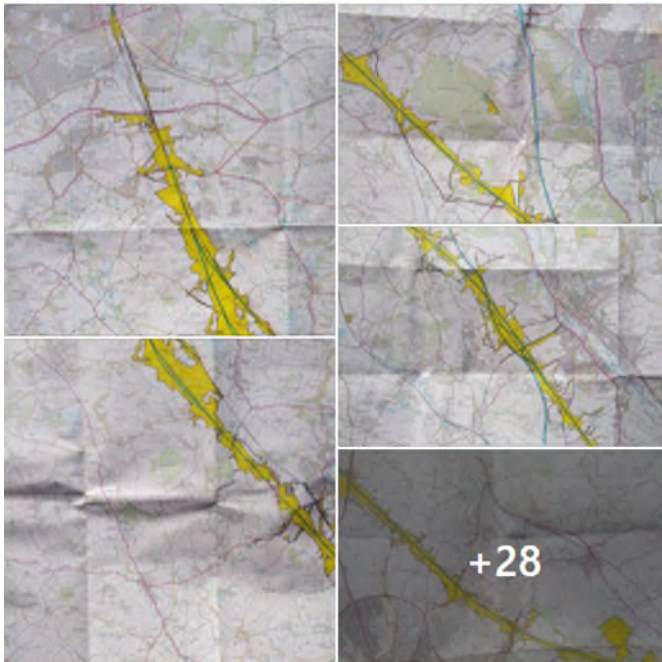
This gives you a good idea of where HS2 are working (and how much land they are taking) whether that be for the actual track, tunnels, gas, electric, water and other utility works as well as for 'mitigation'.

Some maps overlap but I have explained which OS map each photo is of and where tunnels and major depots/stations are as well as locations of camps so that people can get their bearings. I have numbered the maps from London going north up the line (OS 192 1, 2, 3 etc)

Sometimes the blue line goes a bit wobbly (I may have had a drink while doing some of them) so trust the outlined yellow. This does not include all the areas HS2 are working or have compounds but gives a good starting point. Red line means tunnel.

Translated from HS2's safeguarding maps pages that are annoyingly chopped up and monotone so have these.

Feel free to use in whatever way you see fit, share, edit, download, whatever...



<https://www.bbc.co.uk/news/uk-england-beds-bucks-herts-59288105>

HS2: Swampy says protesters' tunnelling can halt project

© 15 November 2021



PA MEDIA

Environmental activists constructed tunnels at their Wendover camp as part of their protest against the HS2 rail scheme

Veteran eco-protester Swampy has said activists' tunnelling tactics can halt the HS2 high-speed railway project.

Swampy, whose real name is Dan Hooper, was one of the **last two protesters to be evicted** on Saturday from the Wendover Active Resistance (WAR) camp.

After 28 days underground, he said "we can stop it with this tactic" and halt the multi-billion pound scheme.

HS2 Ltd urged "anyone who cares about the environment to support [its] project".

The rail line is due to run between London, Birmingham, Manchester and Leeds and **work has started on phase one** from London to Birmingham.



GETTY IMAGES/PETER SUMMERS

Dan "Swampy" Hooper came to prominence in the 1990s protesting against road-building projects

The **current estimated cost of completing** the entire project is between £72bn and £98bn.

Swampy was among protesters who had charges against them dropped recently after they **occupied tunnels near Euston Station in London**.

He had joined protesters digging a tunnel at the WAR camp in Buckinghamshire - between the A413 and the local Chiltern railway line south of Wendover - where eviction began five weeks ago.



The WAR camp was built on land between the A413 and the Chiltern railway line, south of Wendover

The activist told the BBC: "If we look back to the 90s, we stopped the road-building programme [using] tactics like tunnelling, in fact that probably was the [thing] that broke the camel's back.

"So we can stop it with this tactic which will save the country billions of pounds... they just have to reverse it.

"It's hugely unpopular with deforestation on a massive scale.

"This project is pumping millions of tonnes of carbon into the atmosphere so this is a greenwash and it needs to be stopped."

HS2 'cleaner, greener'

HS2 Ltd, which was set up by the government to build the line, has said it will be one of the most environmentally responsible infrastructure projects ever delivered in the UK.

A spokeswoman said: "By providing a cleaner, greener way to travel, HS2 will help cut the number of cars and lorries on our roads, cut demand for domestic flights, and help the country's push to reduce carbon emissions.

"Instead of wasting their time and public money on often violent and disruptive protest, we would urge anyone who cares about the environment to support this project."

Swampy said he "hopes more tunnels will happen on the route" and has not yet ruled out taking part in future protests.

"It's too soon after this one to be able to say whether I will be there," he said.

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

 **Bluebell Woods Protection Camp** was live.
November 16, 2021 · 🌐

Staffordshire ST15 0QS
STOPHS2 resistance grows as HS2 move in to area. We need to preserve this area for future generations. We are being failed by our leaders and the people of Staffordshire are rising up
Come join and support the resistance as we put the final nails in the coffin of HS2



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

 **Bluebell Woods Protection Camp**
November 26 at 12:49 PM · 🌐

Please click below to help us continue blocking gates, building camps and momentum and this movement GROWS ever stronger so we can stop hs2!!! 🙌

We are out 🗣️ or 🙌 so please like, share or comment, pay us a visit or tell all your friends and mp's how bad hs2 is!

<https://www.gofundme.com/f/bluebellwoods...>




  37

4 Comments 55 Shares

https://www.gofundme.com/f/bluebellwoods?utm_campaign=p_lco+share-sheet&utm_medium=copy_link&utm_source=customer

Bluebell Woods Protection Camp (Stop HS2)



 Bluebell Wood Protection Camp is organising this fundraising appeal on behalf of James Knaggs.

A few words from Bluebell

Our mission statement at Bluebell Woods is to work in harmony with the community in order to raise awareness of the Police, Crime, Sentencing and Courts Bill, as well as to. We wish to also build a movement that will put pressure on HS2 Ltd.

Bluebell Woods is named after the beautiful bluebells which carpet the woods, so we are accessing the woods through a field and tread lightly throughout the forest.

To build a strong community here, the bedrock of any movement, we need some funding. This funding will not only fund grassroots activists in their full time work against the system that is causing many issues. It will also help us build up an amazing project renovating the camp into something ter can be proud of. We are planning to build structures in order to defend the land, whilst living amongst nature.

Please help us on this journey and I hope you keep an eye out for updates. If you can't give try and visit us for a cuppa by a warm fire!


Lots of love, Bluebell Woods


£7,574 raised of £9,999 goal

113 donations

[Share](#)

[Donate now](#)

 Anonymous
£20 · 3 hours ago

 Susan Reid
£10 · 3 days ago

 Alexandra Mullarky
£20 · 4 days ago

[See all](#)

[See top](#)

Updates (6)

13 March 2022 by James Knaggs, Beneficiary

We have loads on here! With protests at the gate, compounds prisons and courts as well as supporting each other and working amazingly well we are also building and digging in for an eviction from the 24th onwards! We also have an injunction hearing on the 17th! As well as a whole open weekend Jam packed with friends, fun, bands and activists activities!! It's safe to say we are absolutely smashing it and have loads more surprises and work up our sleeve! ❤️ help us because we work! Help us because you can see it working! Help us smash HS2!

All this time and work costs us so please, please, please help us and be apart of something with us if You can't be with us in person, like and share everything, including the post below!

Alternatively leave a little donation and help us on our way!



1 January 2022 by Bluebell Wood Protection Camp, Organiser

We have had an amazing year at Bluebell Woods Protection Camp! We wish you all a Merry Christmas and a happy new year!

We have been very Busy in these Holidays, In the past fortnight alone we have been building the camp with an new welcome spot and tower that, like our movement, just seems to grow!

We have been regularly frequenting our local hs2 gate, playing silly buggers and campaigning to stop hs2! We have been conducting recces and ecology reports around the local area and woodlands, especially in whitmore wood! The largest deforestation on the line at a whopping 5.5 hectares! Despite the recent cop 26 ruling we would halt deforestation and we found that hs2 are already devastating this woodland! We have been conducting actions at junction 9 the m42 as hs2 had closed the road for a whole week causing huge distrupcion for the country at the taxpayers expense! All at a time when people need to travel to visit their families!

But most importantly we have been conducting ongoing outreach needed to form a community so we can fight HS2LTD. we have so many great locals and wider activists and campaigners that visit and support us due to this important work! With that we have had an initial locals meeting in the town hall, sent Christmas cards and information leaflets to all the local community and continue to build a warm welcoming place where anyone can come and engage! Furthermore, this will be an ongoing venture so keep your eyes out for an outreach roadshow!! 🙌

It's been an amazing year for all at Bluebell Woods Protection Camp we're absolutely smashing it and we can't wait to see how much we can grow and build this community!

We really appreciate all the support of everyone online too, we're saving for a minibus so we can be more flexible and mobile in our actions as "man and equipment over open ground" is what wins campaigns so please click the link above and donate or alternatively please love, like or share and help us reach our goals together!

Love rage and all that in between. I hope you enjoy a few pictures throughout the past few weeks and the 10 months we have been here!



26 November 2021 by James Knaggs, Beneficiary

We have been very busy down at Bluebell woods protection camp! We're going down to the gates and delaying work, working with the community and breathing energy almost daily! As ever we are building for the winter and the impending eviction. We have a new gate house in progress and are always filling up buckets!! We are being as frugal as possible with all your donations and aiming to save it for a minibus so we can campaign consistently and protest at any gate at any time of our choosing! This will also enable us to find resources to build with more efficiently! All were achieving is and aiming for is down to the support of people like you and the local community! Thanks for all your support and help!!! Watch this space for more exciting projects! Please come visit us at bluebell protection camp!



• **11 July 2021** by Bluebell Wood Protection Camp, Organiser

!!!Kill the Bill!!!

Two days ago the third reading of the Police, Crime, Sentencing and Courts Bill happened, where 365 votes for and 265 against it took place.

We must keep resisting this Bill, trespass on land, reside on land, just do what you can! It is not okay to be sitting back at this point, freedom is never won by doing nothing!

Photography by @taltakingpics

#KillTheBill #ResistAntiTrespass #StopHS2



• **26 June 2021** by Bluebell Wood Protection Camp, Organiser

We've been training people to climb here at Bluebell Woods, with a fully qualified tree climber living full time here! We are using the funds to purchase climbing equipment, so please keep sharing our fundraiser



• **10 June 2021** by Bluebell Wood Protection Camp, Organiser

The building at Bluebell Woods is coming along nicely! Thank you all so much for your donations so far, please keep spreading the word of the camp - our Facebook page is Bluebell Woods Protection Camp & the Instagram handle is @resist.antitrespass.Stafford



Facebook post by D25 ON 5 December 2021:

 **Yogi Hilal**
December 5 at 3:51 PM · 🌐

Q: How do you eat a white elephant? A: One leg at a time.

Heathrow Link	CANCELLED
HS1 Link (Eurostar)	CANCELLED
Phase 2b East	CANCELLED
Golborne Spur	YOU'RE NEXT
East Midlands Hub	YOU'RE NEXT
Phase 2b West	YOU'RE NEXT
The Whole Lot	YOU'RE NEXT

#StepUpToStopHS2

  14

1 Comment 2 Shares

ORIG-B-27


Post on Bluebell Woods Protection Camp Facebook page on 2 January 2022:

 **Bluebell Woods Protection Camp** January 2 · 🌐 ...

These are all the properties, and prices paid, that HS2 has forced our home owners via "compulsory!" purchased across the country and rented out, en-mass at above market rates!!


Whole estates in Yorkshire, The mansions at whitmore heaths, whole farmlands around hintz, Lichfield and Aylesbury! All paid for from your taxes, and just look at the money spent! All at a time when there is a housing crisis! If the eastern leg has been cancelled then these properties should return these homes, farms and business to those who were forced to leave!

<https://www.whatdotheyknow.com/.../FOI19%203069%20Annex...>
<https://www.yorkshirepost.co.uk/.../hs2-spends-nearly...>


WHATDOTHEYKNOW.COM 

www.whatdotheyknow.com

  23 3 Comments 38 Shares


 Like  Comment  Share

Most relevant ▾

 Write a comment... 
Press Enter to post.

 **Liam Dogknife Rodgers**
So we could potentially squat some of those properties that might now be empty? Them being a ltd company they'd have to fight through the courts to evict ...

Like Reply 6w

 **Author**
Bluebell Woods Protection Camp
Liam Dogknife Rodgers only non residential, and the police are in their back pocket and claim section 61 but yeah it's possible.


Like Reply 6w

 **Liam Dogknife Rodgers**
Bluebell Woods Protection Camp 🙏

Like Reply 6w

Most Relevant is selected, so some replies may have been filtered out.

Facebook post by D29 (<https://www.facebook.com/jessica.maddison.503>) on 27 January 2022:

 Rollie Diggaholey
January 27 · 🌐

A year ago today, at 4:30am, the NATIONAL EVICTION TEAM moved in on the stop HS2 Euston camp. A year ago today the eviction of many peoples home began. While many occupied the beautiful trees of the park and others occupied the structure we called "Buckingham palettes", 9 of us occupied a network of hand dug tunnels below the gardens.

The eviction lasted 31 days, everyday with those supporting us just a few meters away outside of the fence. It became even more clear just how loved and necessary Euston Square gardens really was to the community. The green space had acted as a safe haven for so many, particularly through the pandemic. The gardens allowed for many homeless and no fixed abode people to be safe and secure within the walls of the park. It meant that vulnerable people in the area always had a space to go to.

Now, one year on, although the camp dismantled and the gardens fenced off from the public, HS2 are yet to make use of this land. They seized one of the only green spaces in the area and they disregarded local, working class voices that screamed against HS2. Instead of listening to the people, they chose to rob a community for their hellish vanity project.

Throughout the eviction, the police harassed, arrested and fined so many outside of the gates. Yet failed to acknowledge that they had chose to evict a home during a global pandemic. The very notion of seizing community land and evicting one from their home is violent.

HS2 is a classist project that is only upheld because of minimum wage workers. HS2 is a classist project that has thieved far more from working class people than many could even comprehend.

Resist HS2, smash classism in the face.



Post on Bluebell Woods Protection Camp Facebook page on 14 February 2022



Bluebell Woods Protection Camp

February 14 at 6:13 PM · 🌐



As usual we have been mega busy building and preparing for the fateful day they try and evict us!
This costs time, resources and money. It's great to see all the work and structures popping up everywhere!

To that end, We really need your help with a few supplies and would really appreciate some help!

We are so close to raising enough money for a minibus so that we can effectively protest in the local and wider areas alike as well as move people and resources enabling us to set up more camps needed to fight this ecocidal project!



Thank you to everyone who has supported us so far, please donate or share to #StopHS2 ❤️

Fundraiser :

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

Wishlist:

Activists

- timber beams
- burning wood!!
- scaffolding poles/clips
- hand saw
- solar panels
- flue pipes
- black pepper
- cooking oil
- filter coffee
- buckets and tubs for storage

Location :

<https://goo.gl/maps/UiN8rXE7MF>

D6 on Facebook on 23 February 2022

(<https://www.facebook.com/661665316/videos/473075977700088>) Copy video at

Video 3.

Jim Knaggs was live.
23 February at 09:20

Please help us fight this injunction, support the camp, build more camps and protest everywhere by helping us buy a minibus because HS2 must be stopped!! We are the resistance! Join us! Or donate at the link below please!!!!
<https://www.gofundme.com/f/bluebellwoods...>
See less

Newest

Carl Woods · 2:33
Minibus!!!!
3 w

Jim Knaggs · 0:00
Carl Woods get the word out we're close! We've worked hard not spending donations and raising awareness so we can save this money!
3 w

Carl Woods · 2:22
Minibus!!!!
3 w

View 4 more comments

Like Comment Share 25 · 7 comments · 770 views

D6 on Facebook on 24 February 2022

(<https://www.facebook.com/661665316/videos/286622000246464>) Copy video at

Video 4.

Audrey Young · 3:01
Gutted for you all, can you fight it? Xxxx
Like 2w
Most Relevant is selected, so some replies may have been filtered out.

Jim Knaggs · 0:00
Audrey Young we can fight the injunction and we will resist and fight the eviction, we need all Hands to the pump but we're ready, we won't go down easy and this isn't the end of us, our camps or the protests.
Like 2w


D17 on Facebook on 10 March 2022

(<https://www.facebook.com/100035849292228/videos/370237454714403>) - Copy video at **Video 5**.

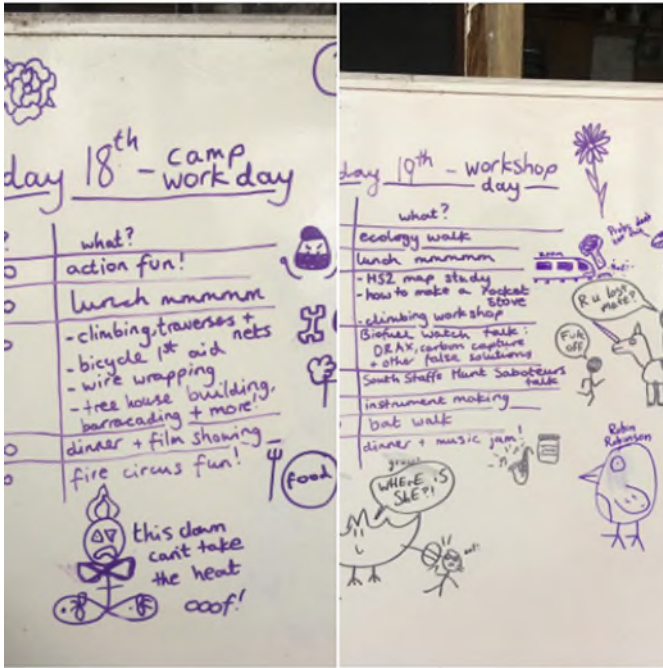


Bluebell Woods Protection Camp Facebook page on 16.03.2022

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

 Bluebell Woods Protection Camp
March 16 at 1:00 PM · 🌐

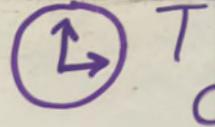
UPDATED TIMETABLE FOR THIS WEEKEND. Thursday not on here but Boom Boom Racoon are playing in the evening!! 😊



The image shows two hand-drawn whiteboard timetables. The left whiteboard is for 'day 18th - camp work day' and lists activities like 'action fun!', 'lunch mmmmm', 'climbing, traverses + nets', 'bicycle 1st aid', 'wire wrapping', 'tree house building, barricading + more', 'dinner + film showing', and 'fire circus fun!'. It also includes a drawing of a person under a fire with the text 'this damn can't take the heat coof!'. The right whiteboard is for 'day 19th - workshop day' and lists activities like 'ecology walk', 'lunch mmmmm', 'HS2 map study', 'how to make a Postcat stove', 'climbing workshop', 'Stuffed watch talk: DRAX, carbon capture + other false solutions', 'South Staffs Plant Saboteurs talk', 'instrument making', and 'bat walk'. It also includes drawings of a person with a speech bubble saying 'WHERE IS SLEEP?', a person with a speech bubble saying 'R u lost mate?', and a person with a speech bubble saying 'Full off'. The name 'Robin Robinson' is written at the bottom right of the right whiteboard.

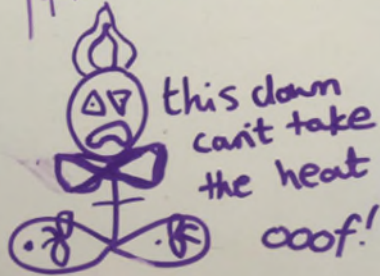
16 2 Shares

Like Comment Share



Friday 18th - camp work day

when?	what?	
8.00	action fun!	
12.00	lunch mmmmm	
13.00	- climbing, traverses + nets - bicycle 1st aid - wire wrapping - tree house building, barracading + more!	
19.00	dinner + film showing	
21.00	fire circus fun!	

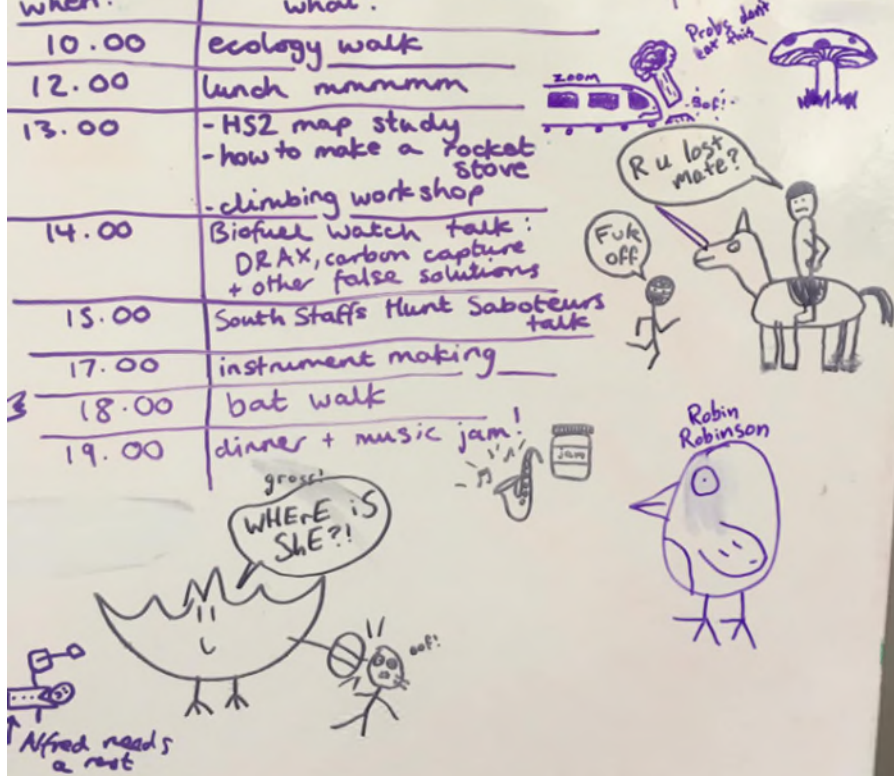


ABLE EVENTS

Saturday 19th - workshop day

when?	what?
10.00	ecology walk
12.00	lunch mmmmm
13.00	- HS2 map study - how to make a rocket stove - climbing workshop
14.00	Biofuel watch talk: DRAX, carbon capture + other false solutions
15.00	South Staffs Hunt Saboteurs talk
17.00	instrument making
18.00	bat walk
19.00	dinner + music jam!

ECOLOGY
101



<https://www.facebook.com/events/350387457009859/?ref=newsfeed>



MAR 17 AT 12 AM – MAR 19 AT 12 AM

Bluebell Open Weekend - The Last Stand

bluebell woods protection camp ST15 0QS

About

Discussion

Interested

Going

Invite



Details

11 people responded

Event by Bluebell Woods Protection Camp

bluebell woods protection camp ST15 0QS

Duration: 2 days

Public · Anyone on or off Facebook

Bluebell Woods Protection Camp invites you to share some skills and prepare for the upcoming eviction. We've been served notice to vacate effective from the 24th of March, so join us for a celebration of these beautiful woods with music, crafts, and practical workshops 😊

Visitors are welcome to stay as long as they like to help prepare for and resist the upcoming eviction.

We'd also like to make lots of chips for everyone so if people have potatoes they could bring that would be awesome 🍟

Thursday 17th

AM

- Arrivals

PM

- Boom Boom Racoon

Friday 18th

AM

- Camp work day

PM

- Film showing

Saturday 19th

AM

A bunch of workshops

- Ecology walk

- Wire wrapping

- Rocket stove making

- Willow weaving

- Bike first aid

- Climbing

- Instrument making

PM

- Jam sesh, bring your instruments!

- Fire stuff, bring your fire stuff!

More to be announced as we confirm plans!

What can you bring?

- Food contributions for communal meals welcome

- Firewood

- Instruments

- Fire stuff

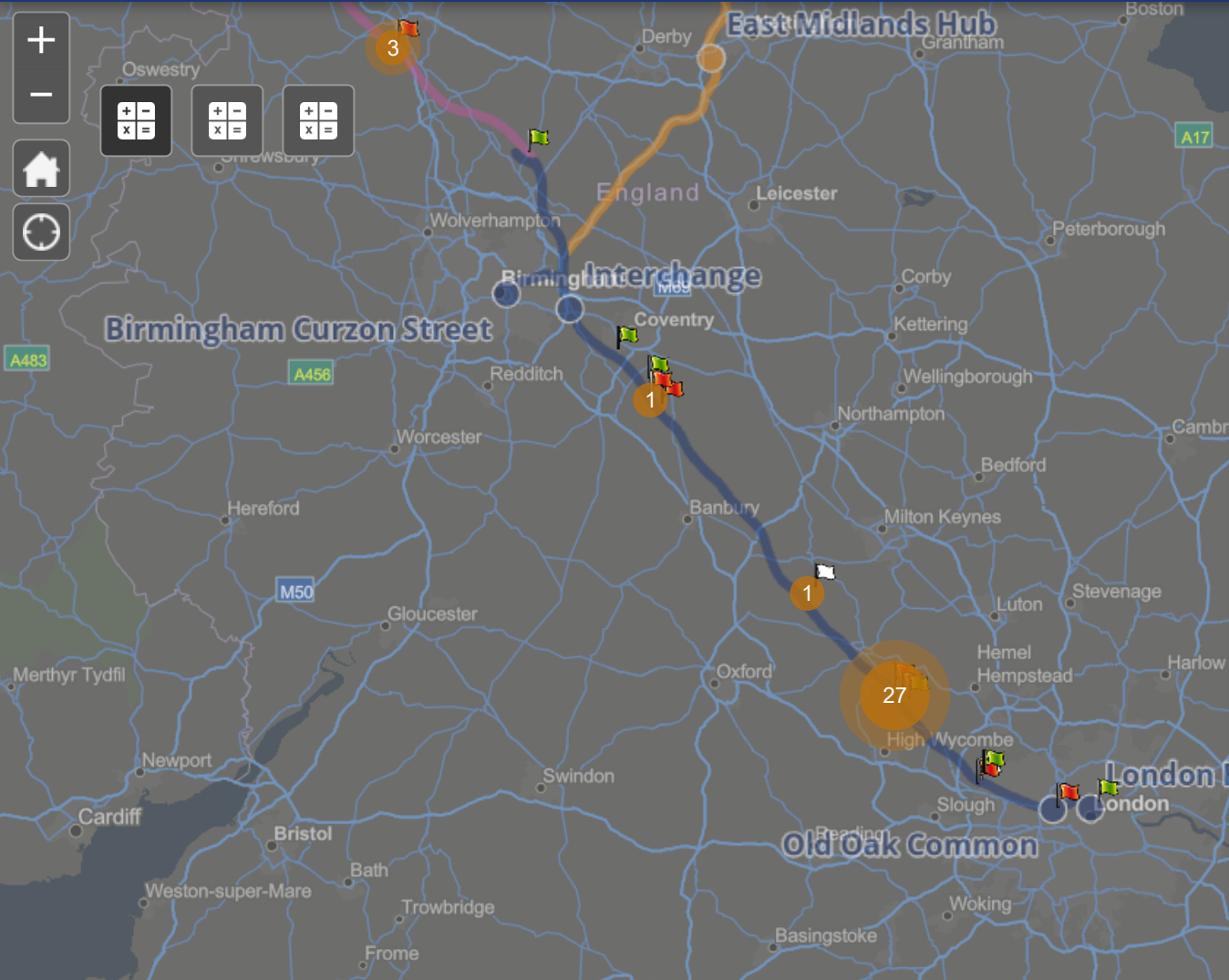
- Tent and sleeping things

- Warm clothes and waterproofs

Do you want to do a workshop? Please shoot us a message and we'll make space for you :) [See less](#)



RESTRICTED - Security Control Risk Operations



Filter by Person of Interest

Select a Group to Filter by

By POI's Name

CONTAINS

Ross Monaghan

Add Criteria

Apply

Reset

Count of Control Risk Reports

32

Summary Physical Security Reports

RESTRICTED - Security Control Risk Operations

Count of Control Risk Reports

19

20km

1.15651, 51.529 Degrees

Filter by Person of Interest

Select a Group to Filter by

By POI's Name

CONTAINS

Dan Hooper

Add Criteria

Apply

Reset

Birmingham factory protest: Pair held after premises damaged

15 June



The pair were arrested after a 34-hour rooftop protest

Two people have been arrested after protesters scaled an aluminium products factory in a demonstration lasting more than 30 hours.

Police said damage totalling thousands of pounds had been done to the Arconic factory in Birmingham.

Protest group Palestine Action claims the firm's products are used in the manufacture of Israeli military jets, but Arconic has not commented.

A man and woman were arrested by specialist officers at about 15:30 BST.

The West Midlands force said a sledgehammer and golf clubs were used to smash windows and skylights and paint was thrown across offices.

Arconic produces aluminium sheet for the aerospace and automotive industries, and **also made the Grenfell Tower cladding.**

The BBC has approached it for comment.

- **Latest news and updates from the West Midlands**

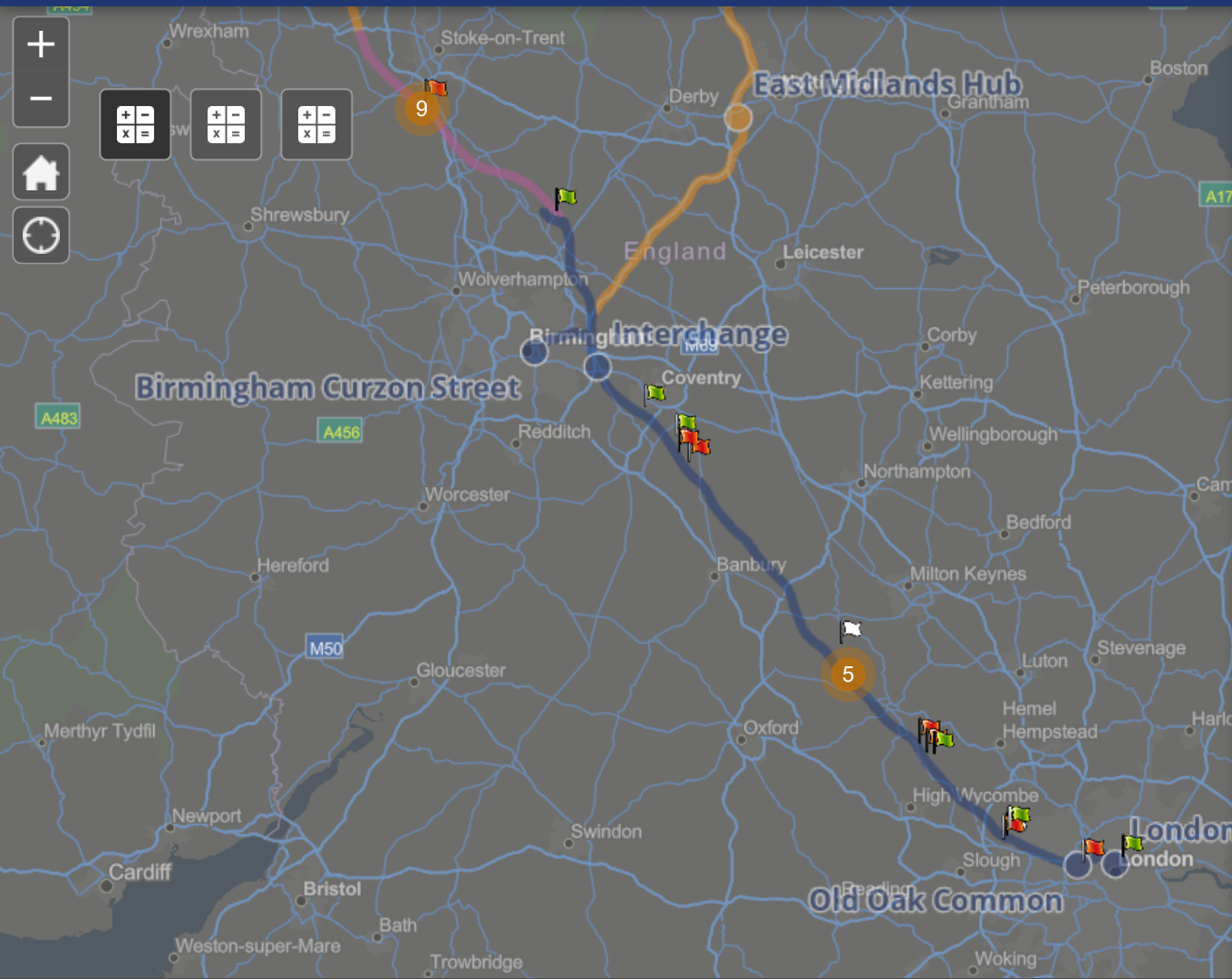
A 26-year-old woman, from Burton-upon-Trent, and a man, who has not provided police with any personal details, were arrested on suspicion of criminal damage, aggravated trespass and a public order offence.

Protesters are thought to have gained access to the Kitts Green Road factory at 05:00 BST on Monday.

The force deployed a specialist police protest removal team, which is specially trained to work at heights, to detain them.

Earlier, police charged a 22-year-old woman from Bury, Greater Manchester, with aggravated trespass.

RESTRICTED - Security Control Risk Operations



Count of Control Risk Reports

14

Filter by Person of Interest

Select a Group to Filter by

By POI's Name

CONTAINS

Jimmy Knaggs

OR

CONTAINS

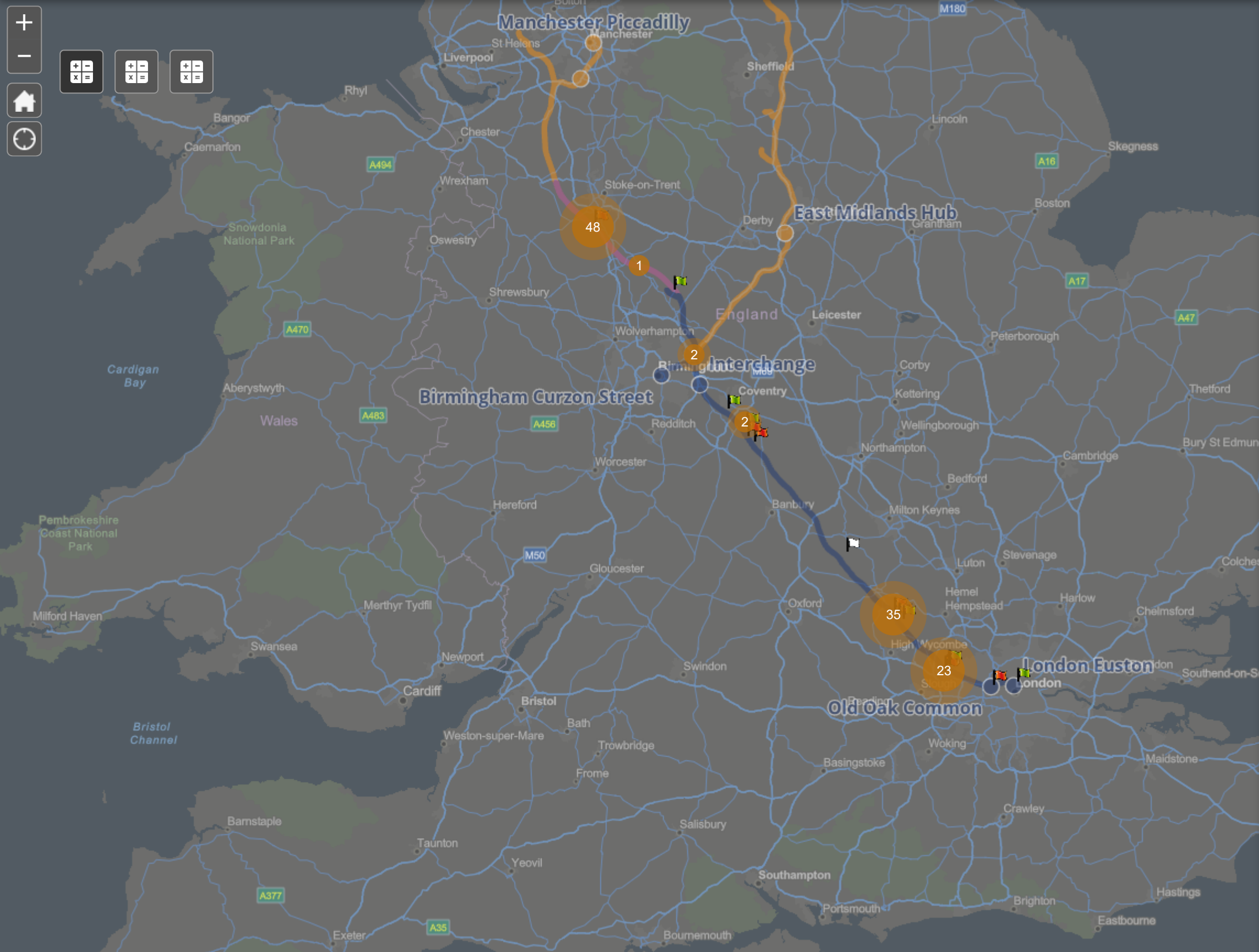
James Taylor

Add Criteria

Apply

Reset

RESTRICTED - Security Control Risk Operations



Count of Control Risk Reports

111

Summary Physical Security Reports

Filter by Person of Interest

Select a Group to Filter by

By POI's Name

CONTAINS

Drew Robson

OR

CONTAINS

Drew

OR

CONTAINS

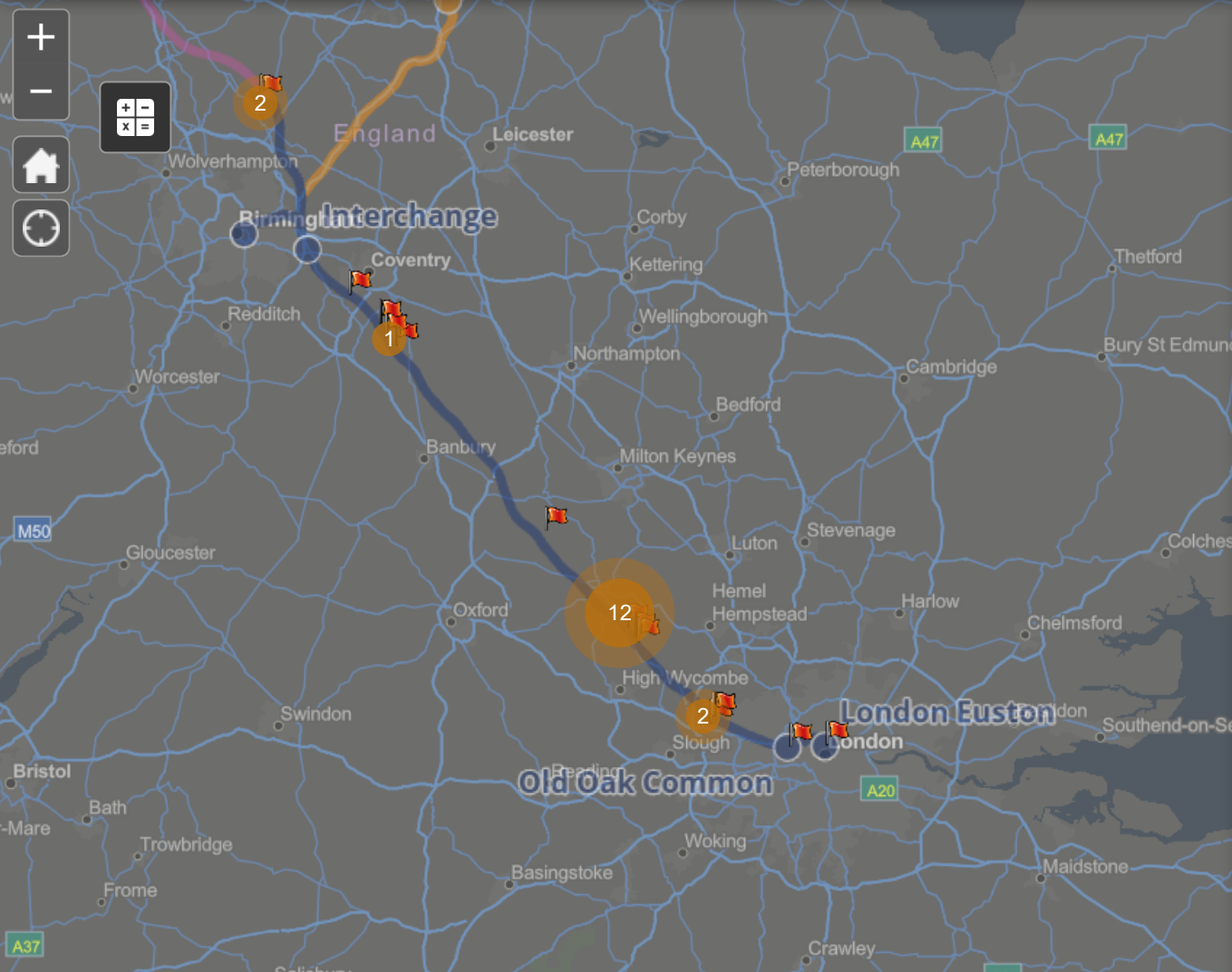
Robson

Add Criteria

Apply

Reset

RESTRICTED - Security Control Risk Operations



Total Count of Incidents

17

Summary Physical Security Reports

Filter by POI's Names

Select a Group to Filter by

By POI's Name

CONTAINS

William

OR

CONTAINS

Harewood

OR

CONTAINS

Satchel

OR

CONTAINS

Baggins

Add Criteria

Apply

Reset

CAPPER'S LANE, LICHFIELD

<https://www.facebook.com/xrtamworthlichfield/posts/478641447060032>

 Extinction Rebellion Tamworth & Lichfield
February 17 · 🌐

Chillin' in the sun 🌞

Kidding. Going after HS2 is what these activists are doing today.
This is the HS2 compound of Capper's Lane, Lichfield.
And the place looks awful. Just a big puddle of mud.
We don't want our countryside to look like this. We want trees. We want hedgerows. We want wildlife.

·
·
·

#StopHS2 #StopHS2Staffordshire #HS2 #Staffordshire #Lichfield #Tamworth #HS2CostingTheEarth



 See how the average temperature in your area is changing.
[Explore Climate Science Info](#)

  22 13 Comments 15 Shares

 Like  Comment  Share

Most relevant ▾

 Write a comment...   
Press Enter to post.

 John Mitchell
Great work folks 🍏🍏🍏 ...
Like Reply 4w    4

 Paulo Donafrancesko
The guards must be doing they're favourite job of sleeping ...
Like Reply 4w

 Author
Extinction Rebellion Tamworth & Lichfield
Paulo Donafrancesko good for us then 😊 ...
Like Reply 4w 


 Paulo Donafrancesko
Extinction Rebellion Tamworth & Lichfield yes great job ...
Like Reply 4w 

<https://www.facebook.com/HS2rebellion/videos/pcb.579323867097283/506333234209574>

Copy video at **Video 6**

HS2 Rebellion
March 16 at 1:02 PM · 🌐

👉 On top of the huge gravel mound stands a flag bearer!
Meanwhile the queue of trucks continues to grow - just wish they'd switch their engines off!
This is Cappers Lane, Lichfield, South Staffordshire
With [Stop HS2 Staffordshire](#)
Get in touch to get involved!
[#HS2CostingTheEarth](#)
[#StepUpToStopHS2](#)
[#HS2CarnageInTheCountryside](#)



36 3 Comments 14 Shares

Like Comment Share

Most relevant ▾

Write a comment...
Press Enter to post.

Hazel Ball
Wondering if building trade is short of aggregate as it looks like it's all sitting on HS2 sites
Like Reply 2d 3

Maria Bagnoli
Thanks to you people! Amazing fight. What is so awful 🤔 a the large scale of it for a rail track. Got to be a land grab.
Like Reply 1d

Crackley Woods, Warwickshire
31 October 2020

Assault and vandalism

Activists located at the Crackley Wood camp breached HS2 Heras fencing and entered the Crackley works site.

Onsite security attempted to intercept activists, however, were physically assaulted by numbers unknown.

Plant machinery, Heras fencing and HS2 property were all vandalised. Photographs showing some of the damage are below.




<https://www.buckinghamshirelive.com/news/buckinghamshire-news/gallery/poors-piece-hs2-eviction-claydon-5037791>

B News Buckinghamshire News HS2

HS2 - Protest eviction takes place at Poors Piece Wood near Steeple Claydon

Police and bailiffs arrived on Tuesday morning

SHARE   

 COMMENTS

By **Tom Burnett** Content Editor
06:00, 24 FEB 2021 | UPDATED 08:06, 24 FEB 2021


NEWS 

Police and bailiffs have been attempting to evict protesters at an anti-HS2 camp in a Buckinghamshire woodland.

Bailiffs arrived at the camp, in Poors Piece Wood near Steeple Claydon in [Aylesbury](#) Vale, at around 6am on Tuesday morning - according to HS2 Rebellion, a group opposed to the high speed railway scheme.

Protesters were in tree houses in the ancient woodland - which they are trying to protect - with police officers using cherry pickers and workers erecting a fence.

HS2 Rebellion said [Lachlan "Lazer" Sandford](#), who recently spent 11 days underground protesting against HS2 at [Euston Square Garden](#) in London, was at the site.

In a statement from the tree tops, he said: "I was in the down-shaft of the Euston tunnel HS2 protest for 11 days before [HS2 bailiffs removed me from a lock-on](#). I'm now in a treehouse at Poors Piece because of the devastation being caused to this planet and the breakdown of its climate and nature." 

"Bailiffs and police are surrounding the tree I'm in but I'll stay up here until the Climate and Ecological Emergency Bill is passed by parliament, HS2 is scrapped or they forcibly remove me.

"This is the only thing I can do to protect the people I love and give them a future to grow up into. I will go on until we win. Will you help me?"

In a previous statement following accusations from [Sian Berry](#) of the Green Party that HS2 had 'got out of hand' HS2 defended the project's impact.

Responding to that, the company said: "43 of Britain's 52,000 ancient woodlands will be affected by the HS2 route between London and Crewe, with 80 per cent of the total area of these woodlands remaining intact and untouched by HS2.

"HS2 journey will emit 17 times less carbon than the equivalent domestic flight and 7 times less than a car journey. HS2's Phase One construction and operation carbon footprint, over 120 years, will emit less carbon than the road network does in one month."



1 of 13

Police officers converse with anti-HS2 campaigners at an encampment in the ancient woodland at Poor's Piece Wood on the edge of Steeple Claydon in Buckinghamshire.

(Image: PA)



2 of 13

A police officer using a cherry picker approaches a treehouse containing anti-HS2 protesters, at an encampment in the ancient woodland

(Image: PA)



3 of 13

A police officer converses with anti-HS2 campaigners at the encampment in the ancient woodland

(Image: pa)



4 of 13

A anti-HS2 campaigner at the encampment



5 of 13

Anti-HS2 campaigners inside a treehouse

(Image: PA)



6 of 13

A police officer using a cherry picker approaches a treehouse containing anti-HS2 protesters
(Image: PA)



7 of 13

Anti-HS2 campaigners inside a treehouse
(Image: PA)



8 of 13

Officers of the National Eviction Team (NET) talk to anti-HS2 campaigners
(Image: PA)



11 of 13

Officers of the National Eviction Team (NET) watch anti-HS2 campaigners
(Image: PA)



12 of 13

A anti-HS2 campaigner berates workers installing fencing
(Image: PA)



13 of 13

Police officers attempt to negotiate with a anti-HS2 protester

(Image: PA)

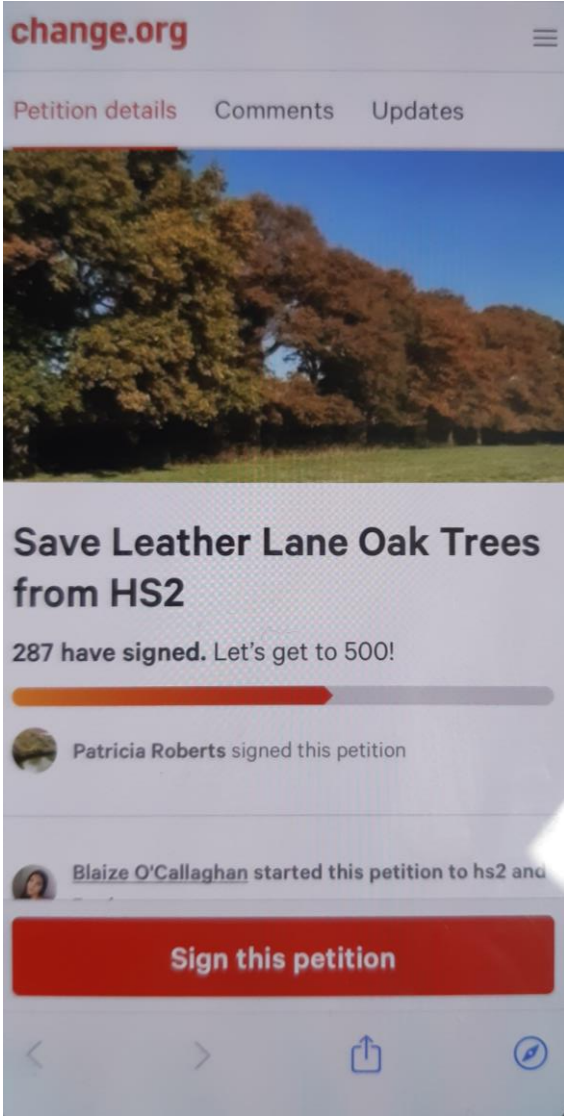
Facebook post – D5 seeking support for Leather Lane occupation 23.02.2021



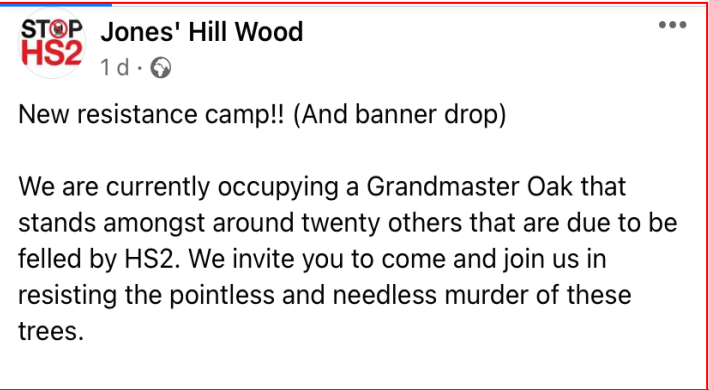
LATRINE DUG AT LEATHER LANE



Leather Lane Camp – 24 Feb 21



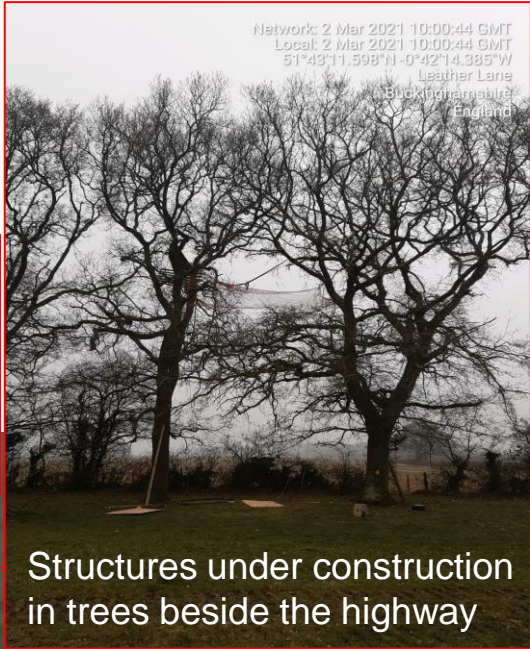
- The camp has been established 19/02/21 by Ross Monaghan the same activist who founded the W.A.R Camp and Jones Hill Wood
- Monaghan was arrested for assault at JHW last week
- Conviction for ABH against a Police Officer in Nottinghamshire in 2018
- Between 6 & 10 activists have occupied trees (as at 16:00hrs 24/02/21)



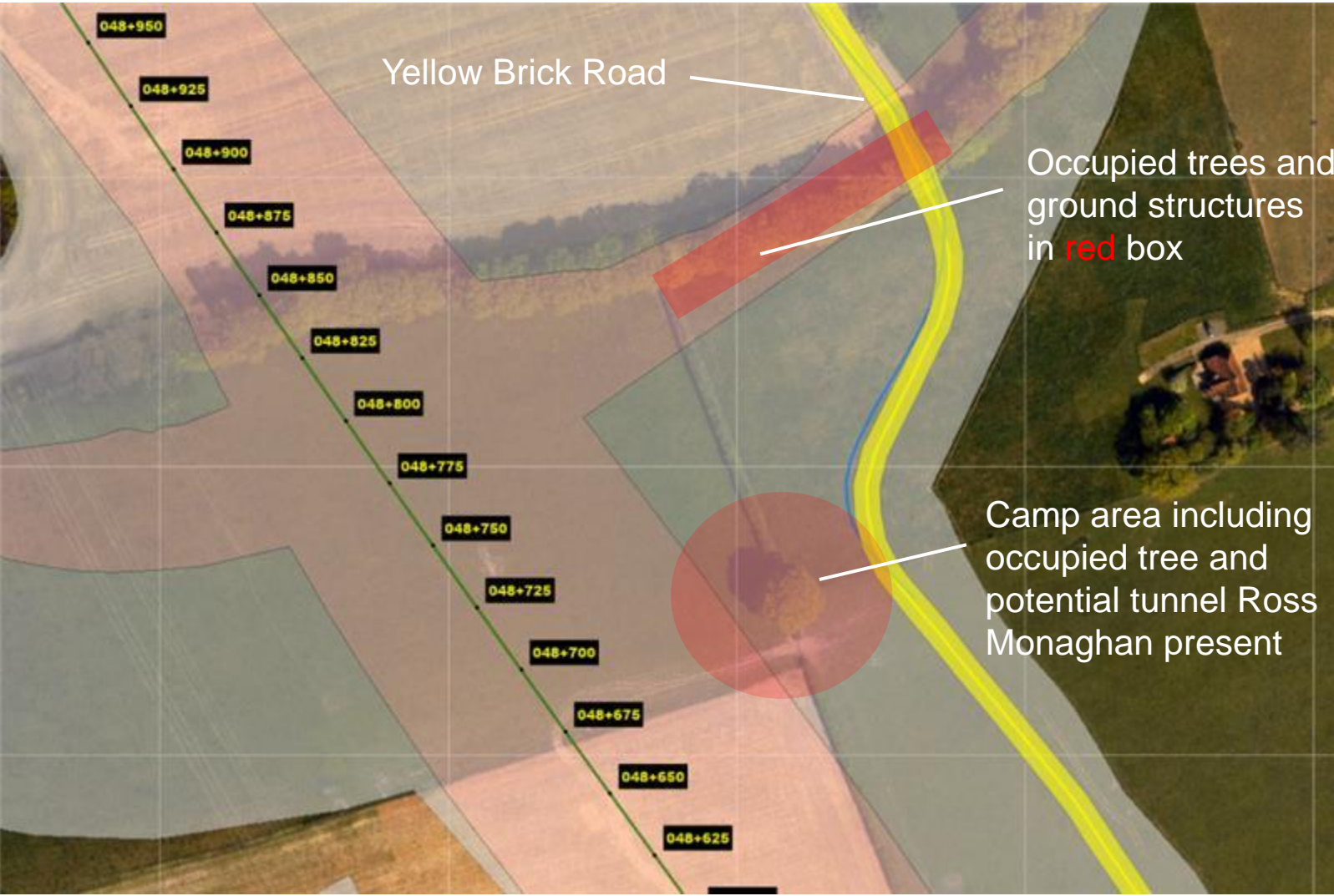
Leather Lane Camp – 02 Mar 21



- Images Recorded 02/03/21
- Estimated occupancy 15 (13 counted 02 Mar 21)
- New Structures in Northernmost tree line (shaded red)
- Activists have been warned they are on HS2 land and they are trespassing – bodycam footage recorded



GIS OVERLAY



M42 Motorway.

30/12/2021

D6, James Taylor (aka Jimmy Knaggs) climbed on top of a Tarmac lorry while coming off a live carriage way on to Junction 9 road closure.



D6 on top of vehicle



D6 on top of vehicle



D6 being arrested following the incident



Blocking the road

<https://www.theguardian.com/uk-news/2017/oct/03/hs2-protester-spends-night-under-digger-demolition>

HS2 protester spends night under digger in effort to stop demolition

Occupation by Sarah Green, 62, later joined by other protesters, is intended to be part of rolling campaign along rail link's route



Green's view from under the HS2 digger. Photograph: Sarah Green

Diane Taylor

Tue 3 Oct 2017 13.20 BST



A 62-year-old environmental protester has spent more than 20 hours underneath a large digger as part of a new campaign to block the construction of the controversial [HS2](#) high speed rail link.

Sarah Green, a member of the Green party and a businesswoman in Hillingdon, started her protest under the digger, which is to be used for preparatory demolition work, in part of the Colne valley nature reserve at around lunchtime on Monday. Several other activists later joined her under the digger.

As well as wider objections about the ballooning cost of the project, protesters say the work will damage local wildlife. Speaking from underneath the digger on Tuesday morning, Green said she had spent "a beautiful night" there looking up at the stars.

The occupation is the first of a rolling programme of direct action set to take place along the route of the controversial HS2 development, environmental campaigners say.

Green said she and other protesters hoped they would be able to stop it taking place. While parliament has already approved an act for HS2 to go ahead, they hope to capitalise on opposition across the political spectrum.

Activists have circulated callouts on social media for tents, tarpaulins, climbing gear, warm clothes, bedding and food.

Advocates of the scheme say that when it is completed it will be the fastest rail network in Europe with trains able to carry 1,100 passengers travelling at 250mph. However, the cost of the development is escalating and it has been billed as the most expensive railway development in the world. The first phase alone is costing £24bn, which is forecast to rise to £56bn for the whole scheme.

One of the environmental protesters, Pete Phoenix, said: "This development is going to take out a lot of ancient woodland and pollute the water in the lakes in this area. Nobody wants HS2. It's a Tory white elephant."

Green said she had complained to HS2 representatives on the site that they had not obtained planning permission to chop down the trees.

However, a spokesman for HS2 Limited said the parliamentary act authorising the development stated that local planning permission was not required for this development.

"There is so much wildlife here," said Green. "An osprey was seen recently and I saw wonderful bats here last night. I don't know if they have a licence to demolish this area given that we have so many bats here. We have reported the bat issue to the police because we believe a wildlife crime may have been committed."

It is understood that HS2 Ltd undertook survey work which did not indicate the presence of bats.


Bailiffs have now surrounded the protesters with a tarpaulin, meaning they are unable to see what is happening. But Green said she could hear cars beeping in support and added that she was determined to go on for as long as possible.

"At the age of 62 this is the first time I've been involved in any direct action protest," she said. "This is the start of the direct action protests against HS2 but there is much more to come."

An HS2 spokesperson said: "There is an ongoing incident at an HS2 site at Harvil Road. The safety of everyone involved is our top priority."

EUSTON CRANE CLIMB 5 SEPTEMBER 2020

<https://www.facebook.com/watch/?v=1419889114873599>



HS2 Rebellion
September 5, 2020 · [Follow](#)

⚠️ HS2 Rebel at the top of 150 foot crane in the HS2 compound, Euston ⚠️

!! "HS2 IS CORRUPT" !!

Saturday 5 September 2020: HS2 Rebel has entered the HS2 compound immediately outside Euston Station, scaled a 150 foot crane there and dropped a banner reading "HS2 is corrupt"

The tree protector, who usually works as a creative artist, has risked life and limb by free-climbing the giant crane and is now securely attached at the top. She has taken only water with her in order to go on hunger strike at the top of the crane until she is either forcibly removed or HS2 is cancelled.

The HS2 rebel comments: "We need to end HS2 and the ruin it has caused, its ruining lives making 1000s homeless, it's ruining our countryside, destroying 108 ancient woodlands, it's ruining our See less

1:39 / 2:20

⚠️ HS2 Rebel at the top of 150 foot crane in the HS2 compound, Euston ⚠️ !! "HS2 IS CORRUPT" !! Saturday 5 September 2020: HS2 Rebel...

Like Comment Share

303 · 52 Comments · 8K Views

Michael Grisley

Write a comment...
Press Enter to post.

HS2 Rebellion
September 5, 2020 · [Follow](#)


!! "HS2 IS CORRUPT" !!

⚠️ BANNER DROP FROM TREE PROTECTOR CURRENTLY OCCUPYING A HS2 CRANE ⚠️

One of our amazing tree protectors successfully climbed up a high crane at the HS2 construction site in Euston this morning to drop the banner "HS2 IS CORRUPT"

🌳 HS2 is one of the largest and most damaging infrastructure projects our country has ever seen , and is representative of everything we are seeking to change within this toxic system. 🌳

#STOPHS2 #HS2REBELLION #HS2ISCORRUPT #TREESNOTTRAINS #NHNotHS2 #H2OnotHS2



544

51 Comments 184 Shares

<https://www.hamhigh.co.uk/news/hs2-protester-climbs-euston-station-crane-in-hunger-strike-3671212>

≡ **Ham&High**

[Hampstead Highgate Express > News](#)

HS2 protester climbs '150ft' crane at Euston Station in hunger strike



Michael Boniface

0

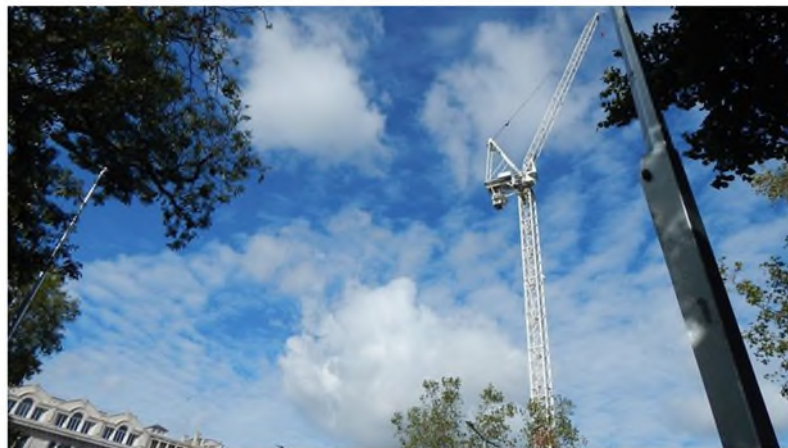


Published: 8:28 PM September 5, 2020 Updated: 2:06 PM October 14, 2020



The banner unfurled on Saturday morning read: "HS2 is corrupt". Picture: Dorothea Hackman - Credit: Archant

A HS2 protester climbed a "150ft" crane at Euston Station in hunger strike against the multi-billion pound rail project.



Picture: Dorothea Hackman - Credit: Archant

The HS2 Rebellion activist climbed the crane in the early hours of Saturday morning using a harness and unfurled a banner that read: "HS2 is corrupt".

The protester was arrested as she came down in the early hours of Monday, it is understood.

HS2 said the Euston protest and ongoing climate demonstrations across London “endangered” the public and put “unnecessary strain” on the emergency services.

But Leayn, when perched in the crane cabin, told the Ham&High: “A lot of people don’t seem to understand the ramifications of what’s happening with HS2.



Picture: Simon Lamrock - Credit: Archant

“A lot of people in neighbourhoods don’t want it, they’re dead against it, but when it comes to actually doing something about it, it’s a very different thing.

“They don’t want to rock the boat and bring anything on themselves and a crane is a massive thing that can be used for promotional materials, the same as anything else. It just makes sense.”

HS2, which will depart to and from Euston Station, could cost more than £100bn and has been subject of strong opposition from Camden residents, campaigners and politicians.

Crane protester Leayn, who is a writer, said it was important HS2 Rebellion’s message “got out in a big way”.

She said her skyline vantage point over London was “humbling” but that the number of buildings too heavily outweighed the number of trees.

Leayn said she wasn’t an environmentalist but someone who cared about the landscape.

"I'm here to try and create awareness," the protester said. "HS2 is not something we need or ever needed, and we really could be improving on something else."

A HS2 spokesperson said: "These protests are a danger to the safety of the protestors, our staff and the general public, and put unnecessary strain on the emergency services.

"All leading wildlife organisations agree that climate change is the biggest future threat to wildlife and habitats in the UK.

"By providing a cleaner, greener way to travel, HS2 will help cut the number of cars and lorries on our roads, cut demand for domestic flights, and help the country's fight against climate change.

"We'd urge environmental groups to help us in getting people out of their cars, off planes and onto low-carbon, high speed rail."

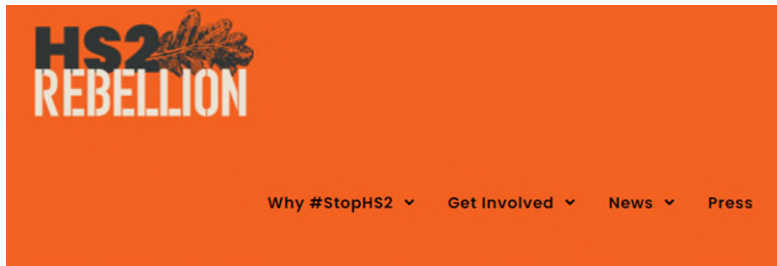
Cllr Oliver Cooper, the leader of Camden Council's opposition, said HS2 was "monstrous waste" of taxpayers' money and that the fight against it was "not lost".

He told this newspaper: "I welcome keeping up the profile of the campaign against HS2, but direct action always risks alienating the very people you're trying to win over."

On Friday, construction work on HS2, a 20-year project that will connect London, Birmingham, Manchester and Leeds, officially started.

Camden Council has been approached for comment.

<https://www.hs2rebellion earth/2020/09/05/hs2-rebel-on-hunger-strike-at-top-of-150-foot-crane-outside-euston-station/>



HS2 Rebel on hunger strike at top of 150 foot crane outside Euston station

Saturday 5 September 2020: HS2 Rebel Leayn, 34, has entered the HS2 compound immediately outside Euston Station, scaled a 150 foot crane there and dropped a banner reading "HS2 is corrupt" (see photo).

Leayn, who usually works as a creative artist, has risked life and limb by free-climbing the giant crane and is now securely attached at the top. She has taken only water with her in order to go on hunger strike at the top of the crane until she is either forcibly removed or HS2 is cancelled.

Leayn, **who is available for phone and video interview from the top of the crane**, comments: "We need to end HS2 and the ruin it has caused. Its ruining lives making 1000's homeless, it's ruining our countryside, destroying 108 ancient woodlands, it's ruining our economy through corruption, 10 times more expensive per mile than high speed rail elsewhere, and it's ruining our future by accelerating the Climate and Ecological Emergency when we must apply the brakes!"

This is the latest HS2 Rebellion action in a week that has seen hundreds of people take dozens of actions against HS2, including dousing the Department of Transport with fake blood and locking on to a bleeding tree carcass at the Home Office and DEFRA.

Three environmental protectors are now on their fourth day occupying trees in Parliament Square, to stop HS2 and promote the CEE Bill as part of ongoing protests held by Extinction Rebellion, Animal Rebellion, Global Justice Rebellion and others.

Athena, 22, **also available for phone and video interview from her treetop in Parliament Square**, comments: "We ask the government to pass the Climate and Ecological Emergency Bill to address the greatest challenge of our time. This Bill will create 1000's more jobs than HS2 for far less money. But don't take my word for it, ask the people! Let's have a Citizen's Assembly on the Emergency response."

For further info call Larch - 07726195412

Crane girl has Court fine to pay!



Dorothea Hackman is organising this fundraiser.

A few words from Dorothea

Remember the person who climbed the crane at Euston Station back in September 2020?

Well, it was their day in court today, and it didn't go so well: Court fine and damages to the police person for their grazed knee.

My name is Dorothea, and I am fundraising for Flowery Zebra because she doesn't have money like that and she was just trying to save our Euston trees and community from High Speed 2 damage. And for other Euston and High Speed 2 related court fines, expenses and damages.

I really admire these young people and older people too, who take non violent direct action against the wrongs they see around them, and there is not much that is more wrong than HS2 worsening the air quality, and increasing carbon emissions with demolition and construction. Bad for our children, bad for global warming.

HS2 were using the crane to demolish those big black tower buildings in front of Euston station, just behind Euston Square Gardens west. Where they have cut down trees and made a temporary taxi rank.



£780 raised of £955 goal

36 donations

Share

Donate now

patricia roberts
£5 · 3 months ago

sharon banzhaf
£10 · 3 months ago

Erin Rutherford
£5 · 3 months ago

See all

☆ See top

Now they are constructing another taxi rank, in Euston Square gardens east, cutting down trees and causing flooding on Euston Road where our little park used to soak up rain water.

Please contribute if you can, there is no way I could climb a crane that high on a construction site, Respect!

Goodness that was quick. It's lovely to have such support from you all. If it's okay with everyone we can use any extra for other Euston court related expenses.



LACHLAN SANDFORD LOCK-ON DEVICE





ORIG-B-70



ORIG-B-71



ORIG-B-72



ORIG-B-73

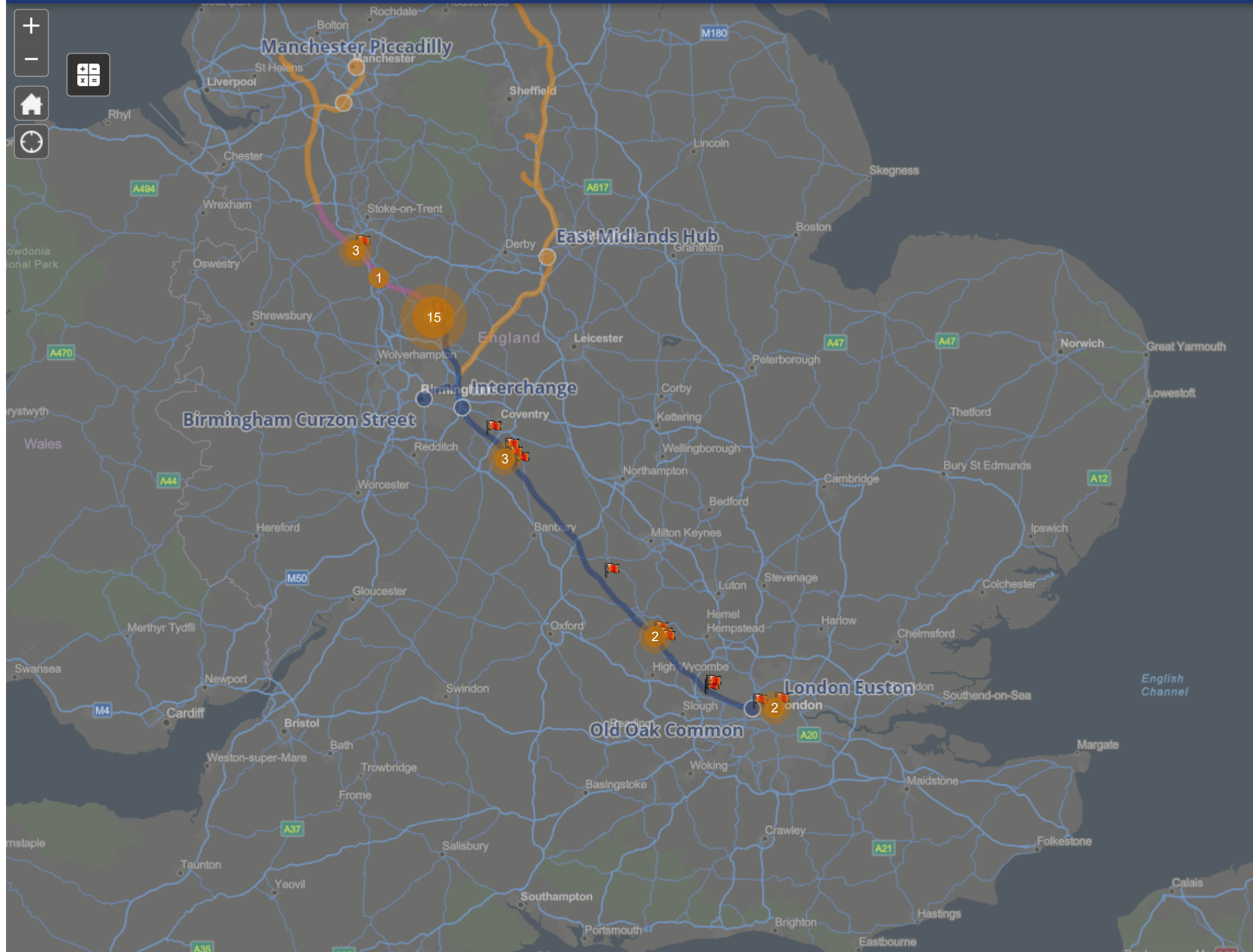


ORIG-B-74

INCIDENT ON 16/12/2019 - TRESPASS AND THEFT



RESTRICTED - Security Control Risk Operations



Total Count of Incidents

26

Summary Physical Security Reports

Filter by Person of Interest

Select a Group to Filter by
By POI's Name

CONTAINS
ELLIOTT

OR

CONTAINS
JELLYTOT

OR

CONTAINS
CUCIUREAN

Add Criteria

Apply

Reset

Photographs of incident

Protestors locking on



Protestors in entrance



Lock-on device



Protestor back at Camp

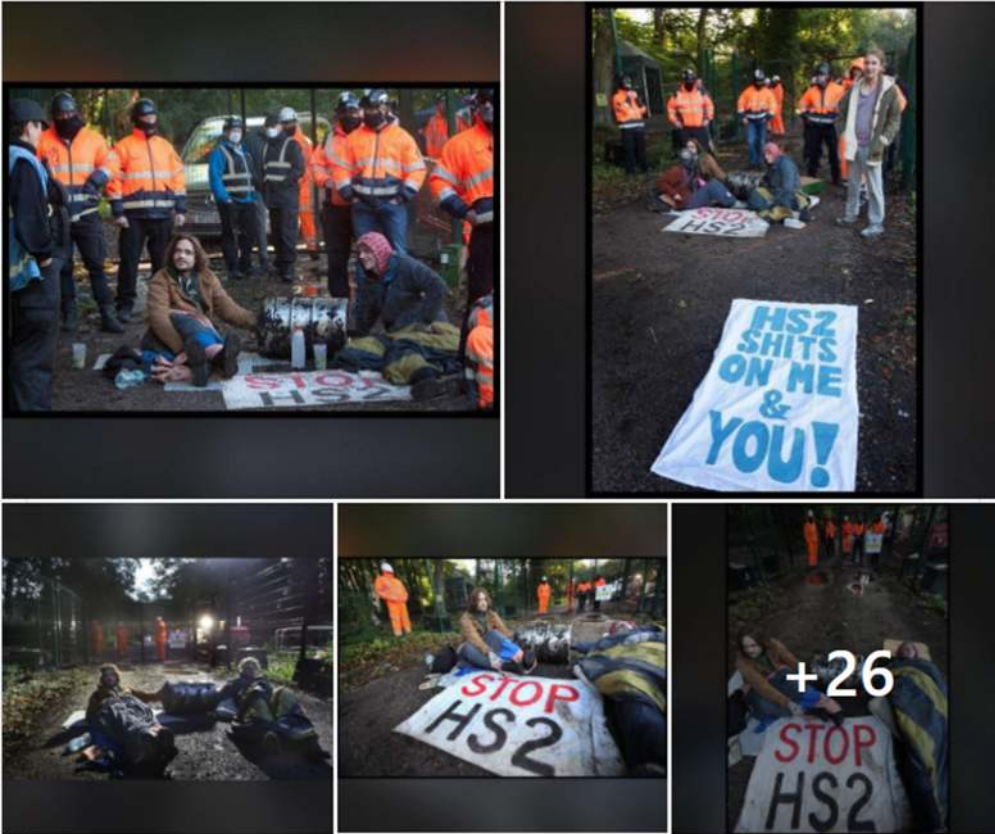






Llama Llamz shared a post.

Yesterday at 7:58 AM · 🌐



Drew Robson

October 3 at 10:12 PM · 🌐

Pictures from this Wednesday's action.
EVERYONE PLEASE SHARE...



We need to continue the fight against HS2 and resist their disastrous crimes against our beautiful ancient woodlands and it's inhabitants as well as destroying precious aquifers, destroying sights of scientific interest, making families homeless, destroying peoples livelihoods, polluting our already dying planet with 1,600 cubic metres of clay slurry known as bentonite.... I could go on and on and on...



Drew Robson was live.

3h · 🌐



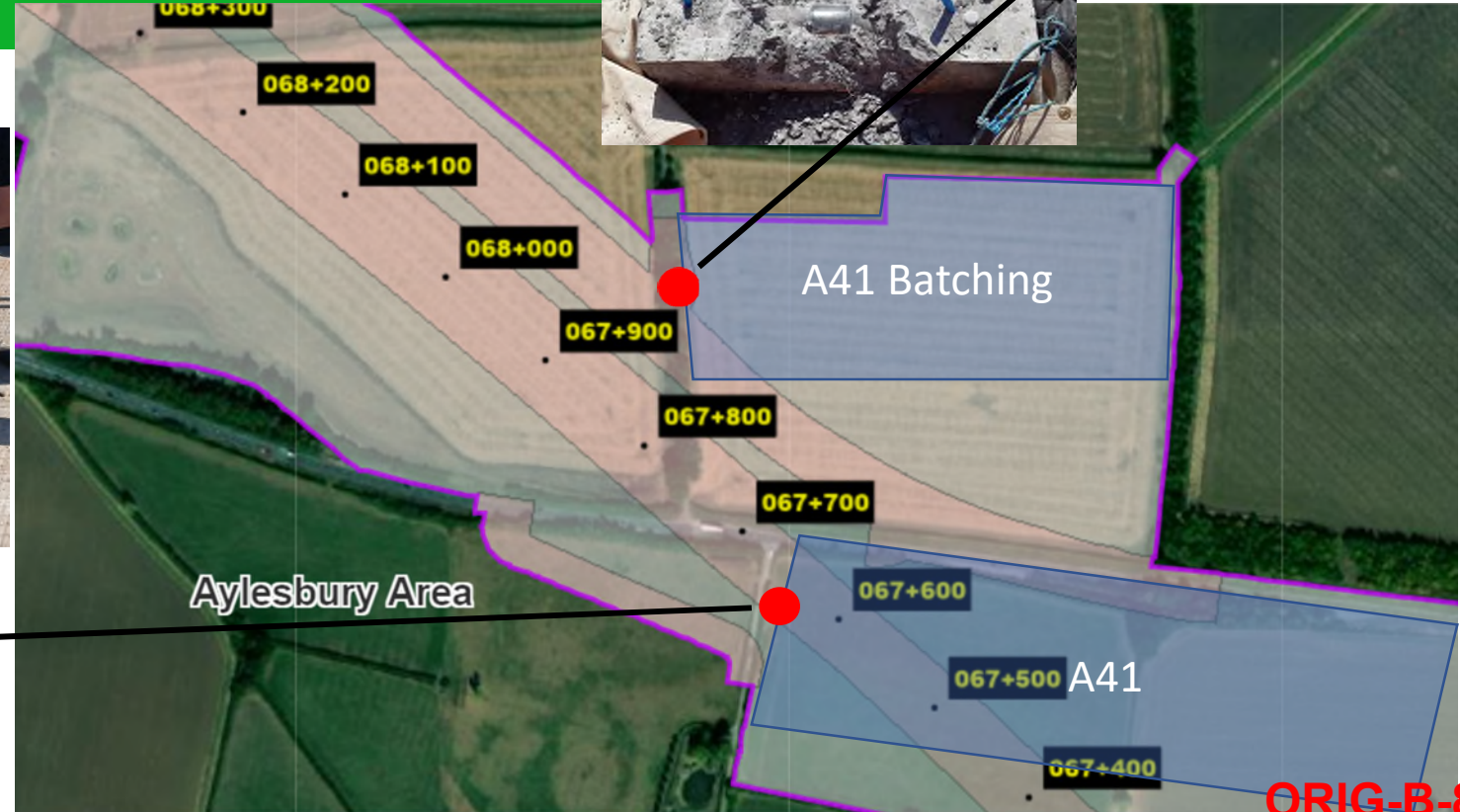
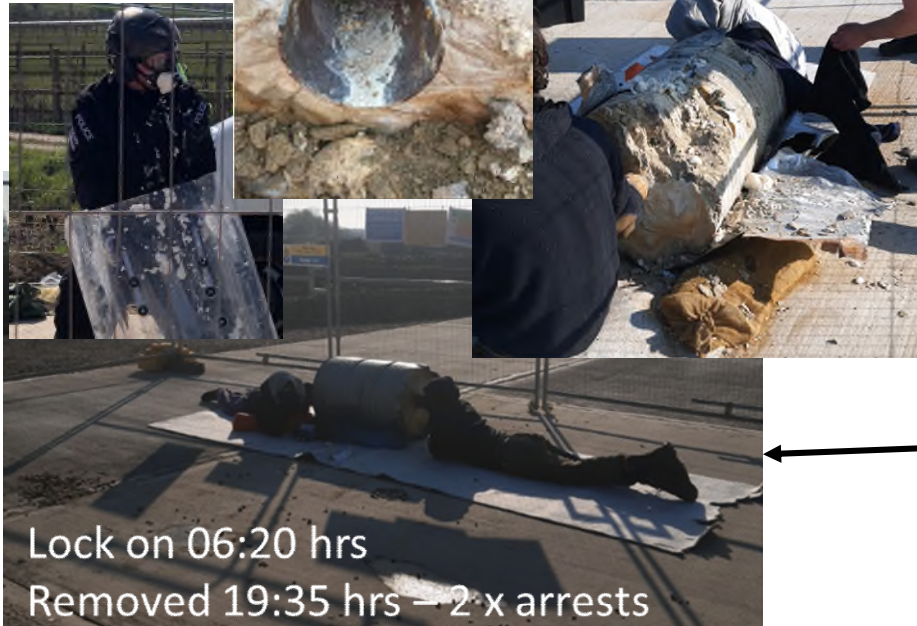
Good morning from Wendover Active Resistance Camp!
We are blocking the main gate of the compound opposite W.A.R camp.
Although we face imminent ejection we still stand against HS2 and will continue to campaign and resist their devastating impacts on our beautiful ancient woodlands and it's inhabitants.
Solidarity with all those who have been affected by this devastating project here in Wendover and across the rest of the line.
People power CAN beat HS2 and stop it!
Come to W.A.R and join us!
YOU can make a massive difference by being here.
It's not to late to pack a bag and get here!
Let's continue to show HS2 that we are not willing to allow them to get away with wildlife crime after wildlife crime and continue to rob people of their homes and livelihoods via compulsory purchase order.
This can still be stopped.
[#stophs2](#) [#nhsnoths2](#) [#resisths2](#)
[#stoptheharm](#)



A41 Lock On – 19/04/21

- Activists deployed “lock on” devices at A41 and A41 Batching at 06:30 Police, IRT, SSSV, and EKFB response team involved in the operation
- A41 Batching cleared at 13:40 hrs, A41 cleared at 19:35 hrs
- 4 arrests in total

Activists conduct lock on protest at 06:20 and removed by 13:00





068+300

068+200

068+100

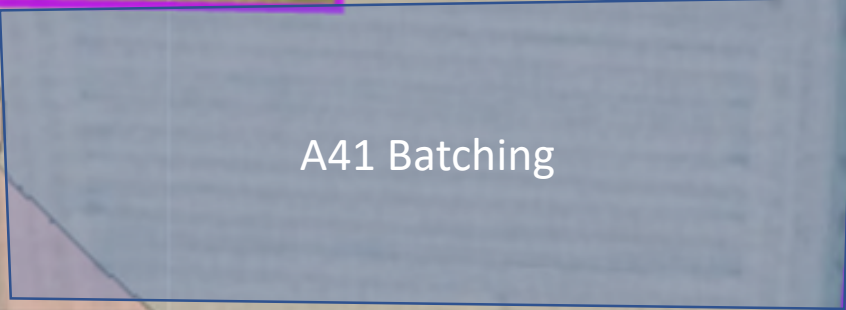


Lock on 06:20 hrs
Removed 13:40 hrs – 2 x arrests

068+000

067+900

067+800



067+700

067+600

067+500



Lock on 06:20 hrs
Removed 19:35 hrs – 2 x arrests

A41

ORIG-B-82



Lock On Construction – Including Booby Trap Expanding Foam

Quinton Vehicle Climb

20/11/2020





Calvert, Buckinghamshire – Obstruction protest

30/10/2020

Screenshots:



Info:

Extinction Rebellion 'Red Rebels' laying on highway blocking gate and vehicles.
Livestreamed on HS2 Rebellion Facebook Page.

Link:

https://www.facebook.com/watch/live/?ref=watch_permalink&v=2745028369099011



Safety Alert



Vandalism to EKFB Plant Equipment

Issued 16th September 2021

Deliberate damage has been caused to EKFB plant equipment located in the NCA Area. Hydraulic hoses and pressure lines have been cut within a locked compartment. We believe this to have been carried out by individuals wishing to cause disruption and delay to the HS2 project.

What we know

- While carrying out pre work equipment checks, an excavator operator identified that hydraulic hoses within a locked compartment had been cut on the machine
- The machine was located at a work site close to the Small Dean protestor site



Action we are taking

- The incident has been reported to the Police
- Additional CCTV is being deployed to the area
- We are engaged with local Police forces across the trace
- HS2 will continue monitoring for events

What you can do

Please be aware of this and pass it onto anyone it may be relevant to:

- Please ensure that all machines are checked thoroughly before use, including within locked compartments
- Please be alert to unfamiliar vehicles and people at your workplace
- Please report all such incident to your line manager and Area Security Manager



TRESPASS AND DAMAGE TO THE PODIUM

06.05.2021

Screenshots from social media:

<https://www.facebook.com/HS2rebellion/videos/1424119907939930/>

HS2 Rebellion
7 May 2021

At HS2's London headquarters, Xavier has taken the incredibly brave action of gluing his hand onto the building.

The conscientious protectors have now been on the canopy roof for over 24 hours.

Continuing with HS2 is not compatible with averting environmental and societal collapse. HS2 will be cancelled. As a nation, we will not continue to waste £20billion a year for another two decades!

The politicians and their cronies know that, which is why they are frantically trying to grab as much money and land from this project before the plug is pulled.

Hopefully, actions such as this one will help to bring the cancellation date forward.

See less

Amanda Gazidis
Love and rage! Thanks for raising peoples awareness of this atrocity. HS2 is an absolute monster bulldozing it's way through the countryside. It is Ecocide and must be stopped immediately. Recently there was a report about the NHS needing 100 billion d... See more

Like Comment Share 260 · 66 comments · 5.2K views

<https://www.facebook.com/HS2rebellion/videos/161995762429142/>

HS2 Rebellion
6 May 2021

Where is the media? Why has so little coverage been given to this action and to the wider campaign for Citizens' Assemblies?

See less


Amanda Gazidis
It's not in their interest to highlight the destruction of HS2... 44 w

Maypril K Boardman
Tweeted copied in mainstream media 44 w

Gill Clapham
Well done larch !! Its not going unnoticed your speeding up getting this bloody HS2 scrapped for good 🙌🙌🙌 44 w

Like Comment Share 98 · 24 comments · 1.5K views

<https://www.facebook.com/HS2rebellion/videos/366715554773859/>



0:30 / 1:17

CALL TO ACTION! VOTE FOR CITIZENS' ASSEMBLIES Larch and another rebel have sprayed the front of HS2's office block in Euston wit...

Like Comment Share 192 · 31 comments · 2.4K views

HS2 Rebellion
6 May 2021 · 🌐

CALL TO ACTION! VOTE FOR CITIZENS' ASSEMBLIES 🔥 ...
See more

Most relevant ▾

Ashley Jennings
HS2 are vandals of the highest order and scarring our land and peoples lives. Paint will wash off. What the Government backed HS2 are doing won't ever be repaired
44 w Edited

Annie Karling
Oh my god! I actually gasped then. Nice one tho! They're destroying our world, we can destroy theirs. Namaste 🙏
44 w

View 19 more comments

Photographs and stills from video:





Climate activists scale HS2 headquarters and vandalise building

 **Comment**



Faye Brown

Thursday 6 May 2021 11:27 pm



19
SHARES



The protesters mounted the roof and are refusing to leave

HS2 Rebellion protesters are in a 'stand off' with police after climbing to the top of the controversial rail line's headquarters and painting it pink.

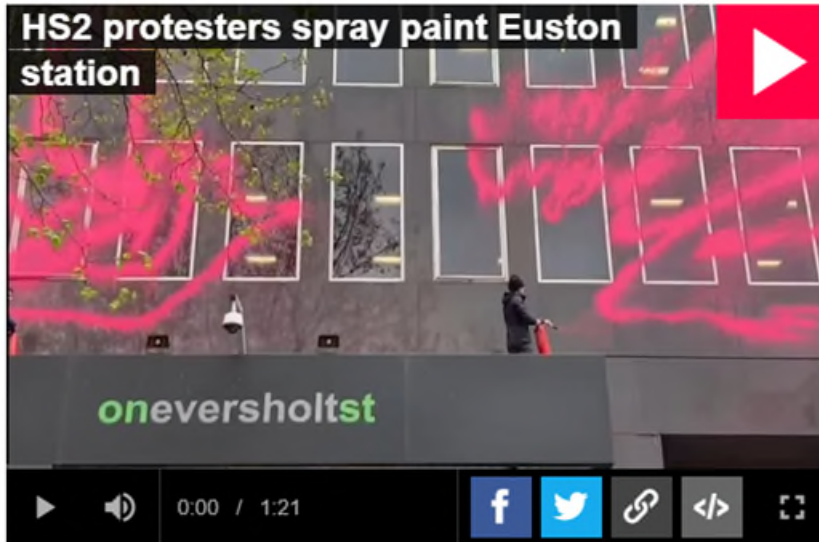
Xavier Gonzalez Trimmer, 20, and Dr Larch Maxey, 48, mounted the canopy of building's lobby in Euston, central **London**, at 10am this morning clutching industrial spray paint machines.

Footage shows the pair spraying the building in neon pink paint to show their support of the Burning Pink Party, which is calling for citizens' assemblies to tackle the climate crisis and other political issues.

Police brought in scaffolding to climb on the canopy in an attempt to coax the protesters down, but the pair are refusing to leave.

Dr Larch, who recently spent 27 days **in a hand built tunnel under Euston Square Gardens**, said he is prepared to stake out all night and risk going to prison because of his vandalism as long as he raises awareness for the cause.

He and Xavier have three demands, including that whoever wins the London Mayoral election tomorrow commits to running a citizens' assembly on the capital's infrastructure.



Protesters spray painted the building in neon pink paint to show their support for the Burning Pink Party

A citizens' assembly – sometimes known as a people's jury – is a body formed from citizens to deliberate on issues of local, national or international importance.

Dr Larch told Metro.co.uk: 'We need ordinary people to be making the decisions about our future, our future is at stake. Risks have been taken with our future by governments and by corporations. So we cannot trust them anymore, we have to have people power now for the citizens assemblies.

'We are risking being sent to prison for this action. We're taking that risk and making that sacrifice because the science says we're heading towards societal collapse.

'The last time there was this much carbon dioxide in the atmosphere London was 25 meters underwater.

'The science is very clear on that, but the media hasn't been covering it enough. The politicians haven't been telling the truth about it. We certainly haven't taken appropriate action.'

Dr Larch also criticised the media for 'ignoring' the mayoral campaign of Valerie Brown, The Burning Pink Party candidate for Mayor of London who opposes HS2.



Activists are demanding the formation of citizens assemblies to deal with the climate crisis



Police have been trying to coax the protesters down (Picture: Reuters)

He attacked Sadiq Khan, the current Mayor of London, for supporting the scheme on the day voters went to the polls to decide if he deserves another term.

Climate activists say HS2 – a high speed railway project set to link London, Birmingham, Manchester and Leeds – will accelerate the current crisis by emitting 14 million tons of Co2.

Protesters also claim the line will destroy or irreparably damage 108 ancient woodlands and 693 wildlife sites, and that Euston Square Gardens will be built over with a temporary taxi rank before being sold off to developers.

HS2 want politicians to establish a citizens' assembly on the project, as well as wider UK infrastructure.

Dr Larch said he knew his demands would not be met overnight but that he hoped his protest would get more people talking about citizens' assemblies.



Larch Maxey, an anti-HS2, previously spent a month in a hand built tunnel under Euston Station

'Once we get the media talking about citizens' assemblies and the importance of that in the future, we will come down voluntarily,' he said.

A spokesperson for HS2 said windows have been smashed as well as graffiti sprayed in the protest at the office in Euston, which is shared with Network Rail.

A statement said: 'We utterly condemn this senseless criminal damage.

'HS2 has been repeatedly and excessively targeted by this sort of criminal activity during the pandemic, threatening the safety of the public and our workers, and placing unnecessary strain on the emergency services.

'HS2 will provide green public transport, take cars and lorries off Britain's roads, reduce the need for domestic flights, and help the country's fight against climate change.'

TREE SPIKING

Network: 5 May 2021 13:05:56 BST
Local: 5 May 2021 13:05:53 BST
51°45'10.155"N -0°43'59.688"W
Hale Road
Wendover
Buckinghamshire
England

WARNING

These trees
are spiked. This
will not kill these
trees nor their
occupants. HSE will
with love compassion
& calm, we wish ALL
Bengals be free from
harm. Stop destroying
Natures Biggest Carbon
Catcher & stop stealing
our childrens future.
With Love, Fitchett
HSE





From: HS2 Security Alerts [REDACTED] >
Sent: Friday, April 30, 2021 4:19:00 PM
To: [REDACTED] >
Subject: HS2 Security Alerts: Health & Safety Warning - Trees are Being Spiked to cause Serious Injury

[This email was sent from an external sender outside EKFB, please treat this email, links and attachments with caution.]



A landowner has reported that anti-HS2 elements have inserted metal objects into trees, intending to cause serious injury by shattering machinery during felling or shredding

This type of tactic, called **spiking**, has been seen in all areas of the project and alerts have been published - this is a timely reminder that **spiking** continues

Check for metal objects prior to conducting related works

From: HS2 Security Alerts [REDACTED]
Sent: Tuesday, July 13, 2021 3:18:18 PM
To: [REDACTED]
Subject: HS2 Security Alerts: Personal Safety Warning - Felled Trees Sabotaged

[This email was sent from an external sender outside EKFB, please treat this email, links and attachments with caution.]

HS2 | ALERTS

On 03/07/2021, it was discovered that a number of felled trees stacked up and awaiting disposal has been tampered with by having nails hammered into the ends

The intention is to either damage wood chipping equipment or cause an injury to the person feeding the trees into the chipper

It is believed this is the first time the tactic has been used in the UK and graffiti at the scene made it abundantly clear this act was targeted at HS2

Spiking, as it is known, has previously been used on trees marked for felling but never felled trees

Although this happened in Cheshire, the person suspected of doing this has operated along the entire line of route, and the tactic is easily replicated so this must be considered a Phase One & P2A issue

Please pass this message to any individuals or companies that you know to be involved in tree felling or disposal on the project, and also to people who manage the procurement of such services so measures such as using handheld metal detectors can be used to keep people and machinery safe

ORIG-B-99



Badger Closures Vandalism



A total of 29 one-way gates have been stolen within 12 incidents.



[REDACTED]
[REDACTED] is a single outlier sett with one entrance [REDACTED]

Timeline:

Gate 1: Installed 06/10/2020 - stolen 21/10/220 (Day 15)

Gate 2: Installed 29/10/2020 – stolen 30/10/2020 (Day 1)

Gate 3: Installed 09/11/2020 – stolen 10/11/2020 (Day 1)

Gate 4: Installed 10/11/2020 – stolen 13/10/2020 (Day 4) including Heras, security camera & all materials. (contd. monitoring)

Gate 5: Installed 13/10/2020 – stolen 24/11/2020 (Day 15) (contd. monitoring)

Gate 6: Installed 24/11/2020

Blade found in tunnel 17/11/2020

Day 21: 30/11/2020



Blade found in entrance



Metal cable ties added



Incident 1: 02/11/2020

Gates stolen from [REDACTED] (Day 3).

Incident 2: 07/11/2020

Protestors were abusive to staff & stopped works during gating, resulting in an arrest of one individual (photo below).

Incident 3: 18/11/2020

Gates stolen from [REDACTED] (Day 11) including cutting into Heras fencing. Restarted monitoring.

Incident 4: 23/11/2020

Gate on [REDACTED] tampered. Metal cable ties damaged/removed & gate moved so did not open. Fixed same day. (contd. monitoring)

Incident 5: 24/11/2020

All gates removed from [REDACTED] No further gating can be undertaken.

Day 21: 2 setts 11/12/2020; 1 sett 07/12/2020; 3 setts 28/12/2020



Damage to Heras fence



Arrested protestor that stopped works



Incident 1: 30/10/2020
Two gates stolen from [REDACTED]
(Day 2). Restarted monitoring.

Incident 2: 04/11/2020
Gate stolen from [REDACTED] (Day 5). Restarted monitoring.

Incident 3: 16/11/2020
Gates raised on [REDACTED] (Day 19). Restart monitoring.

Incident 4: 25/11/2020
All gates stolen and [REDACTED] has been opened (hard-blocked).

Day 21:
[REDACTED] 30/11/2020 & [REDACTED] 07/12/2020



Incident 1: 13/11/2020

Two SD cards were stolen from trail cameras around the Artificial Badger Sett.

Incident 2: 23/11/2020

Seven gates were removed from [REDACTED] (Day 17). Gates were installed & monitoring restarted.

Day 21: 15/12/2020



Incident 1: 23/11/2020

Nine gates were stolen from B [REDACTED]. Gates were installed & monitoring was restarted.

Incident 2: 24/11/2020

Gates were discovered nearby the site.

Day 21: 15/12/2020



Removed gates



Recovered gates

Examples of waste left on HS2 Land by activists

Jones Hill Wood







Leather Lane



Small Dean





JONES HILL WOOD COMPENSATION PLAN AND SOIL DAMAGE BY ACTIVISTS

Compensation plan



HS2 Ancient Woodland data

- Ancient woodland impact: loss
- Ancient woodland impact: retention
- Ancient woodland compensation: soil translocation and planting
- Ancient woodland compensation: woodland creation
- Ancient woodland compensation: ancient woodland enhancement

- Area of JHW felled: 0.7Ha
- 4Ha of new woodland created
- 0.7Ha woodland soils translocated
- New glades and rides, created, enhancing wildlife connectivity between the retained areas of JHW and the existing woodland to the south-east and other habitats.

Soil damage by activists





STILL FROM VIDEO SHOWING HOOPER CHAINED TO ACROW PROP WITH
STEPHENSON-CLARKE LYING ON TOP OF HIM



<https://www.mylondon.news/news/west-london-news/hs2-activists-evicted-field-after-13746690>

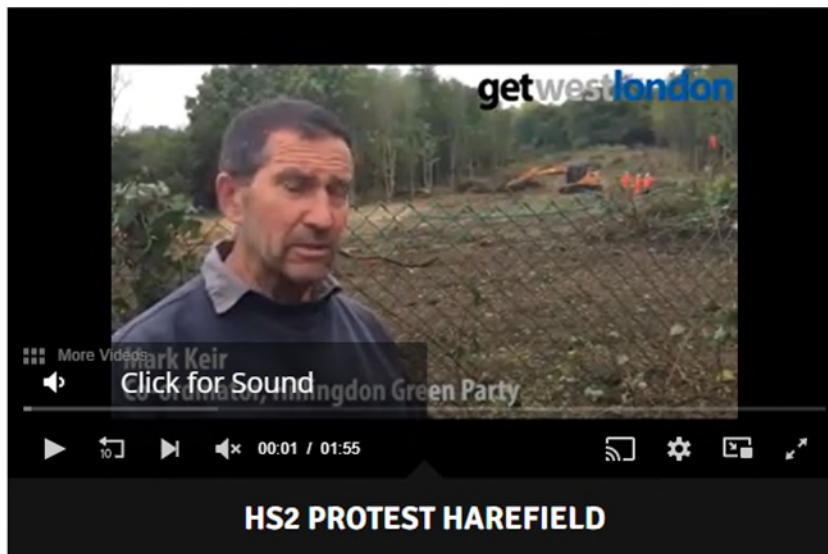
HS2 activists evicted from field after chaining themselves to trees in protest at 'illegal' works

The protesters believe HS2 Ltd doesn't have permission to uproot trees on the land

SHARE     COMMENTS

By [Qasim Peracha](#)
13:24, 11 OCT 2017

NEWS



A small group of activists have been evicted from HS2 land after **chaining themselves to trees** to prevent them being chopped down.

The STOP HS2 activists tied themselves up on land owned by **HS2** Limited in Harvil Road, **Harefield**, on Tuesday (October 10).

The protest followed a three-day occupation of a digger on the same site the week before.

Activists and the company are locked in a dispute over the felling of trees of the land, which is being cleared to make way for a high-speed rail link between London and the West Midlands.

Sarah Green, who led both protests, told *getwestlondon* that she was evicted from the land at around 10.30pm by bailiffs who forcibly carried her off the land.

"There are protected species including bats and badgers living in the trees here and they are uprooting them illegally without a licence or any planning permission," she said.

ORIG-B-117



📹 **Activists had chained themselves to trees shortly after midday on Tuesday (October 10)**

(Image: Natural Guard UK)

"HS2 limited think that the hybrid bill means they can do whatever they like on all the land they now own but this makes a mockery of all the planning permission laws.




📹 **One activist used a bicycle lock to attach himself to the tree** (Image: Natural Guard UK)

"We were reassured in the House of Lords that HS2 Ltd would need to ask for individual planning permission at each individual site they worked on."

A spokesman for HS2 Ltd argued that all necessary planning permissions were in place and told *getwestlondon*: "HS2 will rebalance the economy by connecting eight out of our 10 biggest cities, increase rail capacity on the current system and reduce journey times, while also creating thousands of jobs across the UK.



 **HS2 Ltd contractors fenced in the protesters and shielded them with black tarpaulin**

(Image: Natural Guard UK)

"We understand that people feel strongly about the impact the project will have on their community.

"Reducing these impacts are at the heart of our designs, and we'll continue to work with communities to try and address their concerns.

"A small number of people have been escorted, under police supervision, from HS2 land in [Hillingdon](#) .

"They were not in an active working area. The safety of all involved remained our top priority throughout and no-one was injured."

10 October 2017 – Lock-on Incident

Filmed and livestreamed by male person unknown. Later uploaded to YouTube as two videos called "lockon1" and "lockon2" by group calling themselves "Utopian Bohemians": <https://youtu.be/-EFVY7rvQ0c?list=PLm3tQ5n8ftZJUXzEba-I4InYy484sx7L2> and <https://youtu.be/3-kPGfdULDo?list=PLm3tQ5n8ftZJUXzEba-I4InYy484sx7L2>





Twitter:

Stop HS2 Retweeted



Lizzy @LifebyLizzy · 10 Oct 2017

Protestors chained to trees @savecolnevalley #HS2 #StopHS2 #LockON OMG!
@DailyMirror @DailyMailUK @Telegraph @guardian @TheSun @ITV @BBC



↳ Stop HS2 Retweeted

**STOP
HS2**

Stop HS2 @stophs2 · 10 Oct 2017

"This tree felling is illegal,,,, We are inside the compound trying to stop them from taking down these trees." #HS2



Recap after campaigners protested under digger at HS2 site

The protesters are trying to stop trees from being cut down as part of the high speed rail link works

getwestlondon.co.uk

STRUCTURES IN TREES

Harvil Road, Hillingdon, February 2020



Crackley & Cubbington, Warwickshire, May 2020



Denham Country Park, Buckinghamshire, July 2020



Jones' Hill Wood, Buckinghamshire, October 2020





Image shows D24



Image shows D24 and D31



Image shows D18

Euston Square Gardens, January 2021



Image shows D49 who was removed from the trees during the enforcement operation and arrested and subsequently convicted of aggravated trespass.





An HS2 Rebellion protester on a zip line between two trees in Euston Square Gardens



Poor's Piece, Buckinghamshire, evicted February 2021



Image shows D27



Leather Lane, evicted March 2021









Network: 10 Mar 2021 15:18:53 GMT
Local: 10 Mar 2021 15:18:52 GMT
51°43'9.126"N -0°42'15.18"W
Leather Lane
Buckinghamshire
England

Small Dean, Buckinghamshire, evicted October 2021





Cash's Pit, Swynnerton, Staffordshire



Network: 13 Aug 2021 at 11:57:00 BST
Local: 13 Aug 2021 at 11:57:00 BST
N 52° 58' 3.466", W 2° 18' 29.476"
16 Woodbury, Snape Hall Road
Newcastle
England
ST5 5HS
United Kingdom



<https://www.dw.com/en/hambach-forest-evictions-resume-following-journalist-death/a-45615541>

NEWS

Hambach Forest evictions resume following journalist death

Clashes broke out earlier this month when police tried to force out activists who have been occupying the forest as part of a protest against coal mining. Activists say there's more at stake than just the Hambach Forest.



Date 24.09.2018

Related Subjects [North Rhine-Westphalia](#), [Cologne](#)

Keywords [Hambach Forest](#), [Cologne](#), [protests](#), [RWE](#), [North Rhine-Westphalia](#)

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German police on Monday continued evicting environmental demonstrators from the disputed Hambach Forest between the cities of Cologne and Aachen.

Authorities last week began clearing makeshift camps from the site where German energy giant RWE plans to expand its coal mining activities. All actions were suspended last Wednesday, however, after a 27-year-old [journalist fell to his death from a rope bridge](#) connecting two trees in the forest.

The Interior Ministry for North Rhine-Westphalia said that activists had put up [new barriers over the weekend](#) that needed to be cleared. The state government also urged all protesters holed up in tree houses to evacuate the site immediately.

Authorities maintain that the demonstrators have for several years been illegally occupying the Hambach Forest, which is owned by RWE. The energy giant intends to clear some 100 hectares (247 acres) of woodland to mine for lignite — a brown, low-grade coal considered to be one of the most polluting fossil fuels.

Meeting Germany's energy needs?

While authorities quietly tolerated the activists' occupation of the Hambach Forest since 2012, protests have come to head in recent weeks after authorities ordered the woods to be cleared immediately, citing fire hazards. RWE has also said it intends to begin cutting down trees as soon as next month.

The protests over the centuries-old forest have come to symbolize [Germany's uneasy transition away from fossil fuels](#). Protesters have been arguing that Germany should stop extracting fossil fuels and commit to its clean energy goals.

RWE, meanwhile, maintains that clearing the forest is necessary to meet Germany's immediate energy needs. Germany continues to remain heavily reliant on coal, partly to offset Chancellor Angela Merkel's decision in 2011 to phase out nuclear power by 2022.

**BAG CONTAINING FAECES THROWN AT OFFICERS AT JONES HILL
WOOD**



D17 DIGGER CLIMB

12.05.2021



Drew Robson

September 23, 2021 · 🌐



Today I plead guilty at High Wycombe Magistrates to the offences of aggravated trespass and criminal damage.

Although pleading guilty was not my first choice my solicitor discussed with me that this was the better option given the evidence that HS2 had against me.

The judge was really lenient and sympathetic of our cause and even said the Anti HS2 campaign was one that in years to come will be looked at in a very different light.

12 month discharge and order to pay for criminal damages caused to the tree grabber during it's occupation. I was not ordered to pay any court costs or fines and just to pay for the damage caused to the grabber which I'm grateful for.

I will NEVER stop fighting HS2.

[#STOPHS2](#)



👍❤️👏 203

52 Comments 18 Shares

👍 Like

💬 Comment

↪️ Share









TOWERS

Small Dean Towers

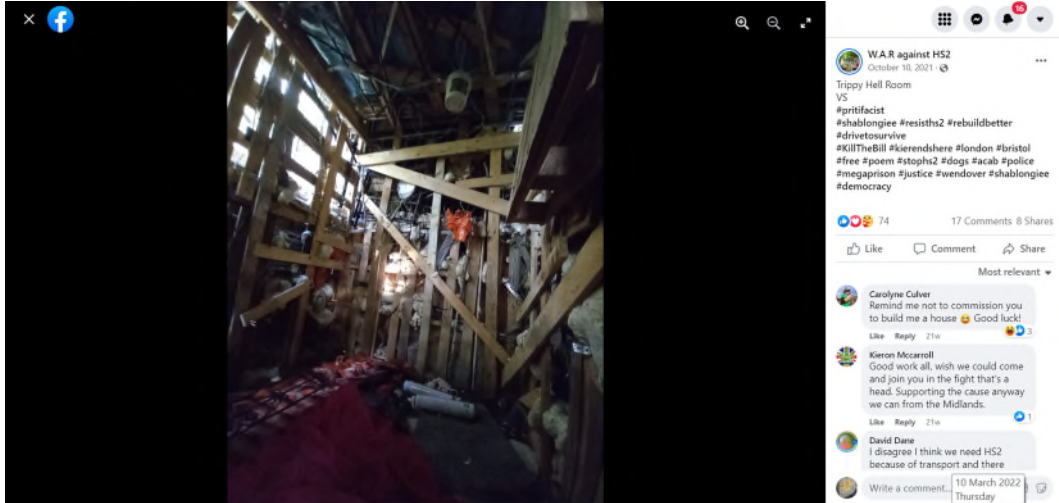
North Tower



South Tower



10 October 2021 – Trippy Hell Room Still Image Located inside the Temple (South Tower)



Poors Piece Tower



Cash's Pit Swynnerton








EXTINCTION IS FOREVER

STOP HS2

HS2 Rebellion - Facebook Post Outlining Tactics

- DELAY, DELAY, DELAY
- SHARE THE LIVESTREAMS
- JOIN THE CAMP SUPPORT NETWORK
- COME TO AN #HS2 CAMP IF YOU CAN

 **HS2 Rebellion**
October 10, 2020 · 🌐

Yesterday's action by activists from [Extinction Rebellion UK](#) 🇬🇧

TRIPODS STOP HS2 WORKS IN DENHAM 🚧🚫

? HOW CAN YOU HELP? ?

HS2 is a hugely expensive project which is destroying vast areas of beautiful countryside and ancient woodland as well as people's homes. It will destroy countless trees - and as we know, trees are life 🌳

The line will never be carbon neutral and with news this week that the second leg may never even be started, all HS2 will succeed in doing is cutting 20 minutes from the journey from London to Birmingham - mainly for business commuters at about £240 a ticket. And it's costing the taxpayer over £100 BILLION 🤔😱

WHAT'S THE RESISTANCE PLAN? 🤔

The strategy is DELAY DELAY DELAY. Protesters are delaying the HS2 project for as long as possible in the hope that they can protect nature until the project is cancelled. Today protesters were locked on to tripods to stop work along as much of the line as possible.

WHAT CAN YOU DO? 🤔

1. SHARE THE LIVESTREAMS 📺 Share the streams on our page so people can see what is going on and learn why it is important to stop the project. Tell your friends why HS2 is so bad and needs to be stopped!
2. JOIN THE CAMP SUPPORT NETWORK ON WHATSAPP 🌐 There is a Protection Camp Support Network (PCSN) WhatsApp group which you can join - contact the HS2 Rebellion page to be added. It is a low-traffic group where callouts are placed for urgent supplies such as tarps and pallets as well as bodies when evictions happen.
3. COME TO AN #HS2 CAMP IF YOU CAN 🏠 If you are able, your presence for a day, a week or all of Winter would be appreciated! Just a day at the camp will allow long-term protesters to leave the camp for a shower and a nice meal.

We want to thank the amazing people who are giving so much of their time, even during this pandemic, to protect nature ❤️ TOGETHER WE CAN STOP THIS!

Repost by XR Cambridge.

Posted to HS2 Rebellion Public Facebook Page 9 Oct 20



HS2 Rebellion
October 9, 2020 · 🌐

49 3 Comments 2 Shares

Like Comment Share

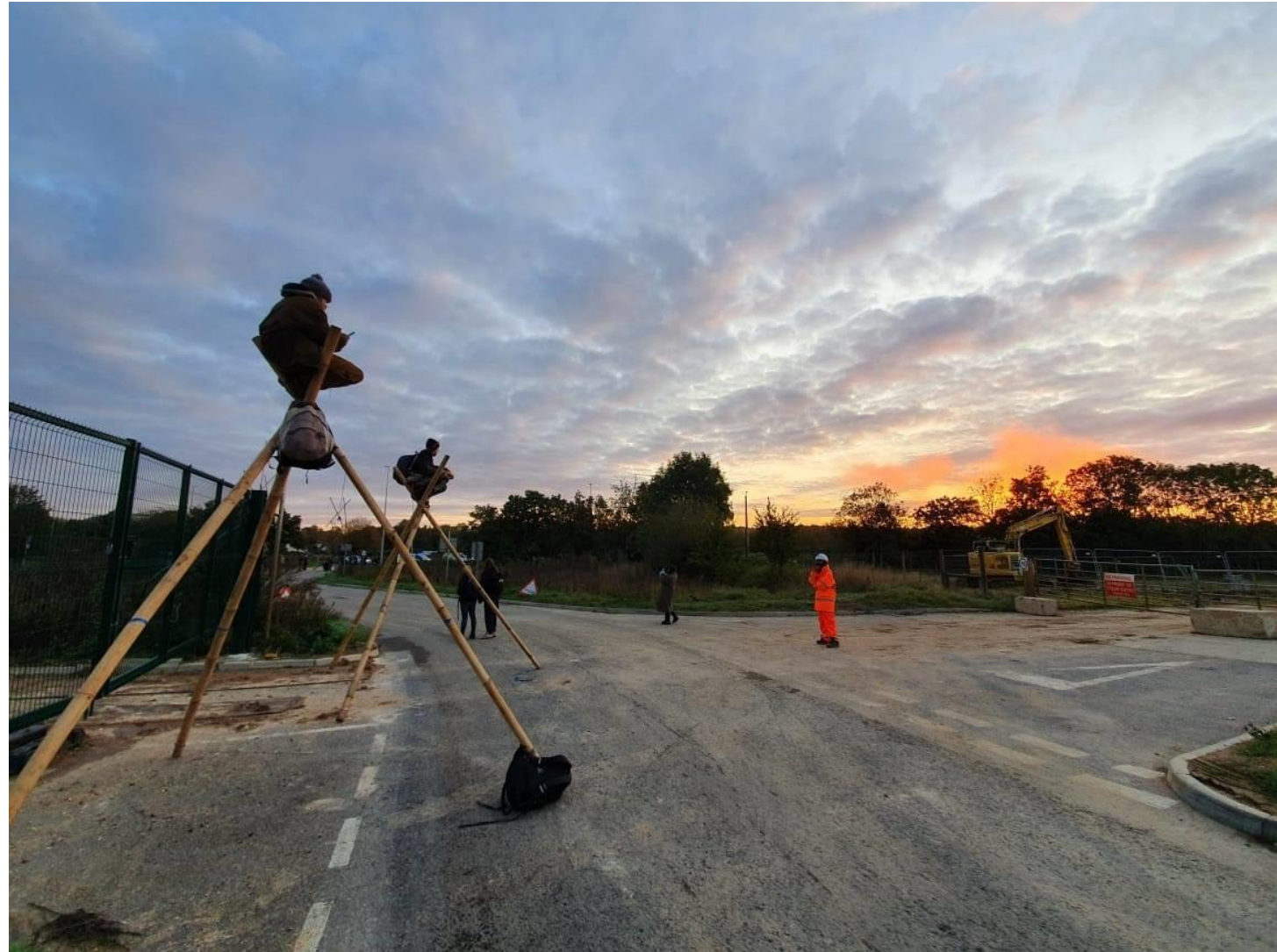
Most relevant ▾

Sandra Spidey Atkins
THANK YOU 🍀
Like Reply 1y 🍀

Thea Holly
Amazing people.
Like Reply 1y

Maris Vigar
I'm speechless with wonder and gratitude for all you lovely people!
Like Reply 1y 🍀 2

Write a comment... 🗨️ 📷 🎬 🗑️



ORIG-B-157

Activists Locked on to the base of Bamboo Tripod



<https://www.theguardian.com/uk-news/2020/dec/08/veteran-activist-swampy-among-protesters-in-hs2-site-standoff-with-police>

Veteran activist Swampy among protesters in HS2 site standoff with police

Protesters are trying to stop construction at site in Colne Valley nature reserve, west of London



📷 Environmentalist Swampy, whose real name is Daniel Hooper, protests at the HS2 construction site in Denham. Photograph: Peter Nicholls/Reuters

Gwyn Topham

🐦 @GwynTopham

Tue 8 Dec 2020 13.25 GMT



Police and eviction squads have gathered in a standoff with HS2 protesters including veteran activist **Swampy**, who is sitting in a 30ft bamboo structure over a river in an attempt to stop HS2 building a works bridge through the Colne Valley nature reserve.

Activists put up the makeshift tower in the River Colne at the weekend to stop workers erecting the bridge and cutting a temporary road through the Denham Country Park woodland.

However, on Tuesday morning, construction crews had set the first half of the steel bridge into place, within a few metres of reaching Swampy's nest in the river, while security personnel lined the water.

Thames Valley police said two men had been arrested on suspicion of attempted assault in connection with the protest

Swampy - as Daniel Hooper, 47, is best known - said that attempting to complete the bridge with protesters in the way would be “shockingly dangerous”. Speaking to the Guardian before the standoff, he said: “Normally they’d get a cherry picker and a few police climbers to get me down but in a river it’s quite dangerous.”

He said that the Denham protest camp, which has occupied parts of the country park for the last six months, was saving dozens of ancient oaks and other trees from destruction. Swampy said he hoped that the action was “at least slowing **HS2** down until the government decides to scrap it”.

Contractors have been attempting to build an access road to relocate electrical pylons for the planned high-speed railway, and had put in place the concrete foundations of the bridge.

Sam Smithson, an environmental protector, said HS2 had declined proposals to take cut through a nearby golf course rather than the woodland. She said: “Every single day we are witnessing the landscape drastically changing, HS2 is felling trees and **irreparably destroying nature** before our eyes.

“This is a non-violent peaceful protest and we will continue to do this until the government takes its own advice by acting now to stop biodiversity loss which means stopping HS2.”

HS2 said the work was not impacting ancient woodland, and that alternative access routes - needed to divert power lines crossing the path of a new viaduct - would have been more environmentally damaging.

An HS2 spokesperson said: “HS2 has been repeatedly and excessively targeted by political activists. This criminal activity, including illegally trespassing on our construction sites, is a threat to the safety of the public and our workers, and places unnecessary strain on the emergency services during the pandemic.”

Work on the first phase of the £100bn high-speed rail line is accelerating at the major works site three miles away at South Heath in Buckinghamshire. Two 170 metre-long tunnel-boring machines are being assembled to start drilling the 10-mile Chiltern tunnels in spring 2021.

The two 2,000-tonne machines were manufactured in Germany before being shipped in parts to the UK. The construction site beside the M25 is the size of 80 football pitches, with the tunnel’s south portals already created ready for the machines.

HS2 Ltd’s chief executive, Mark Thurston, said: “The launch of our first tunnelling machines will be a defining moment in the history of HS2 - and our work to deliver a high speed railway that will offer a low-carbon alternative for journeys across the UK.”

Major civil engineering work **started this year**, after the government **decided in February** to press ahead with the high-speed rail network.











12 May 21 – Boswells Farm
Opposite Small Dean Protest Camp



ORIG-B-166





Still from video 12.05.2021 – activists in coveralls



WEAPONS

Jones Hill Wood

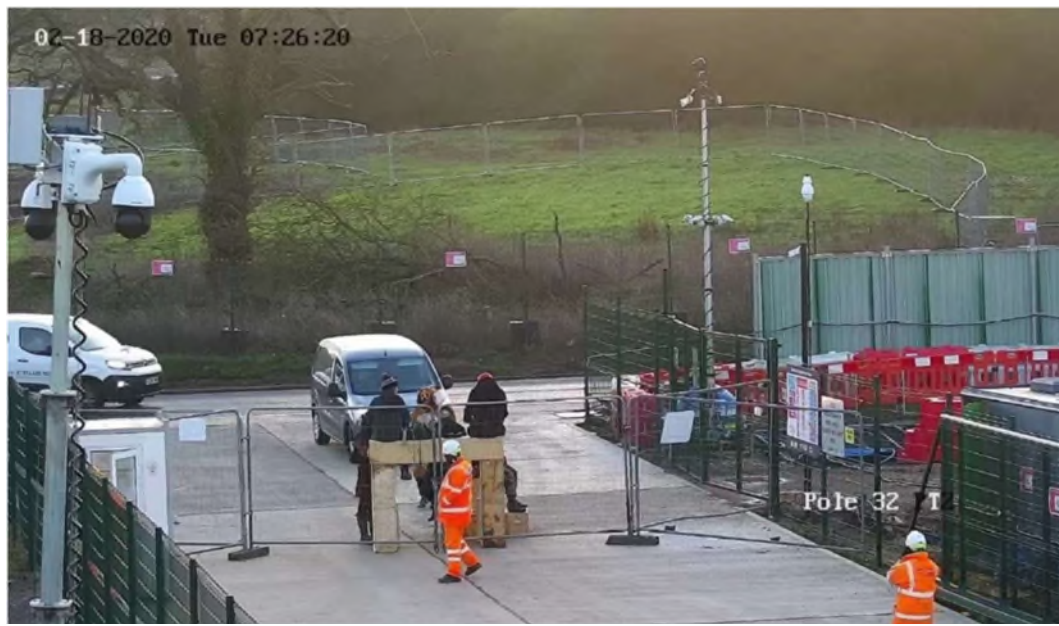


D61 carrying a knife



**PHOTOGRAPHS OF EXAMPLE HARVIL ROAD INCIDENTS MAY 2019 TO
MAY 2020**

18.02.2020 – OBSTRUCTION OF BELL-MOUTH ENTRANCE TO SITE

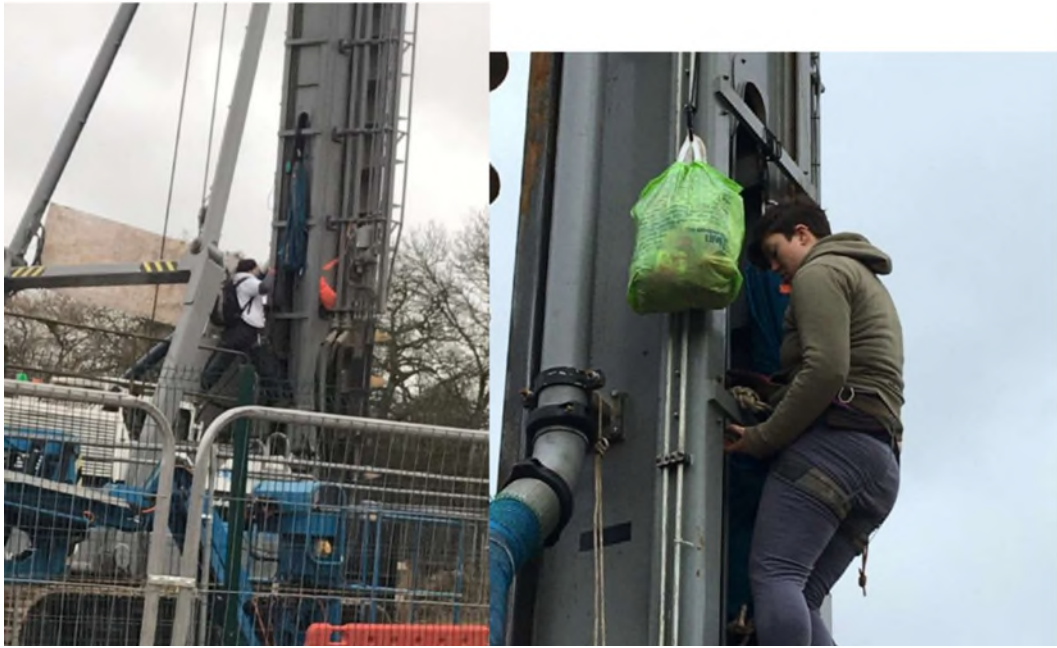


18.02.2020 – D43 TRESPASS ON PILING RIG





20.02.2020 – D40 TRESPASS ON PILING RIG

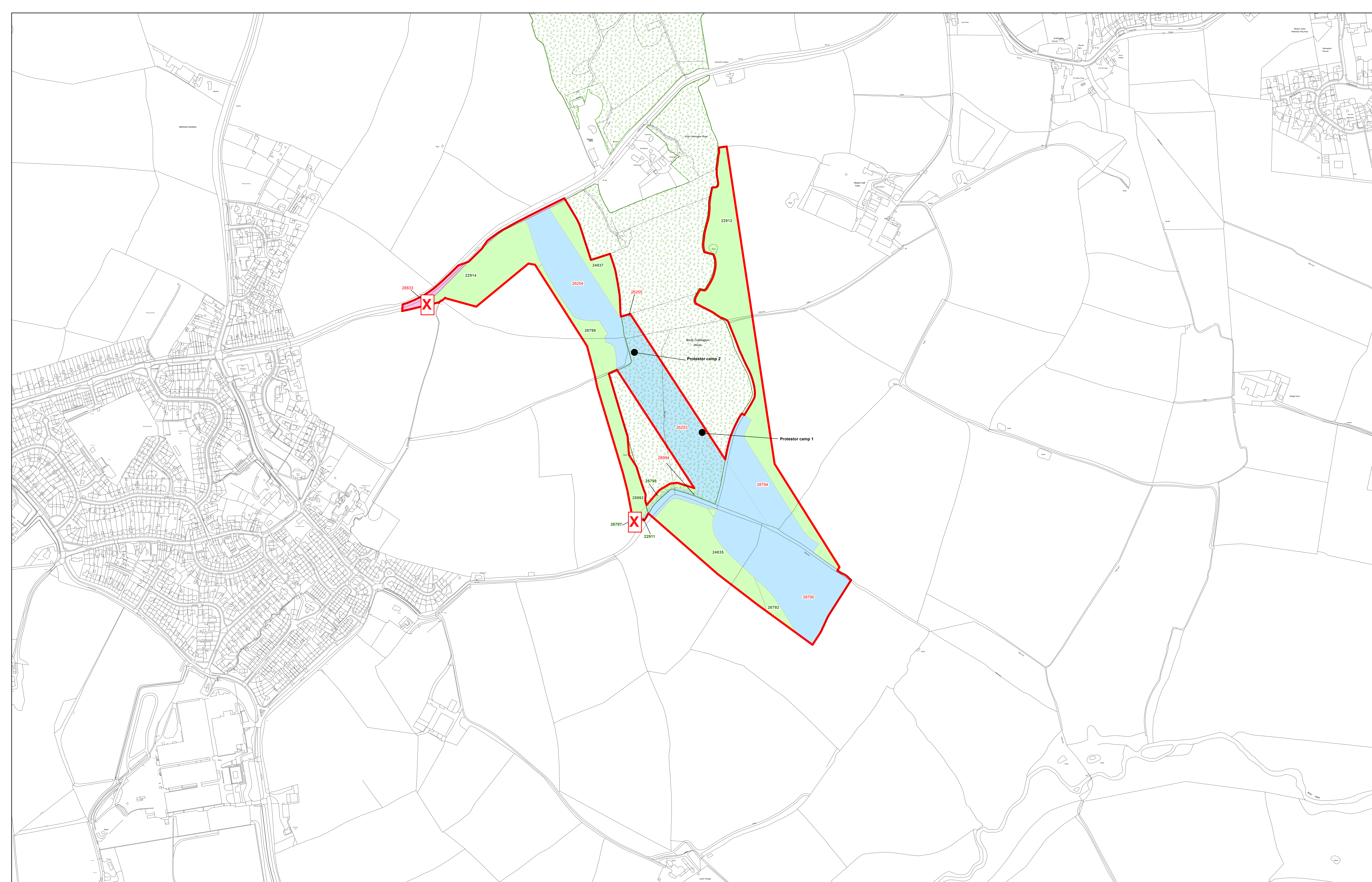




19 NOVEMBER 2019 LOCK-ON AT HARVIL RD

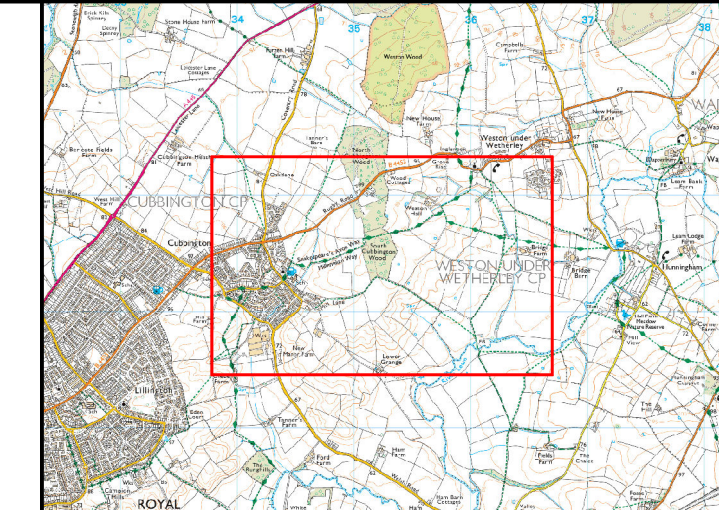






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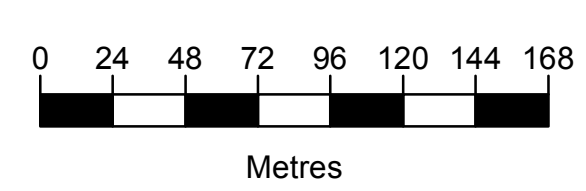
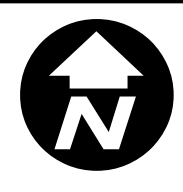
- Protector Camps
- Land Required
- Vested GVD
- Schedule 16 notice served and possessed
- Vested GVD registered to Secretary of State on HMLR register
- Ancient woodland



Plan A

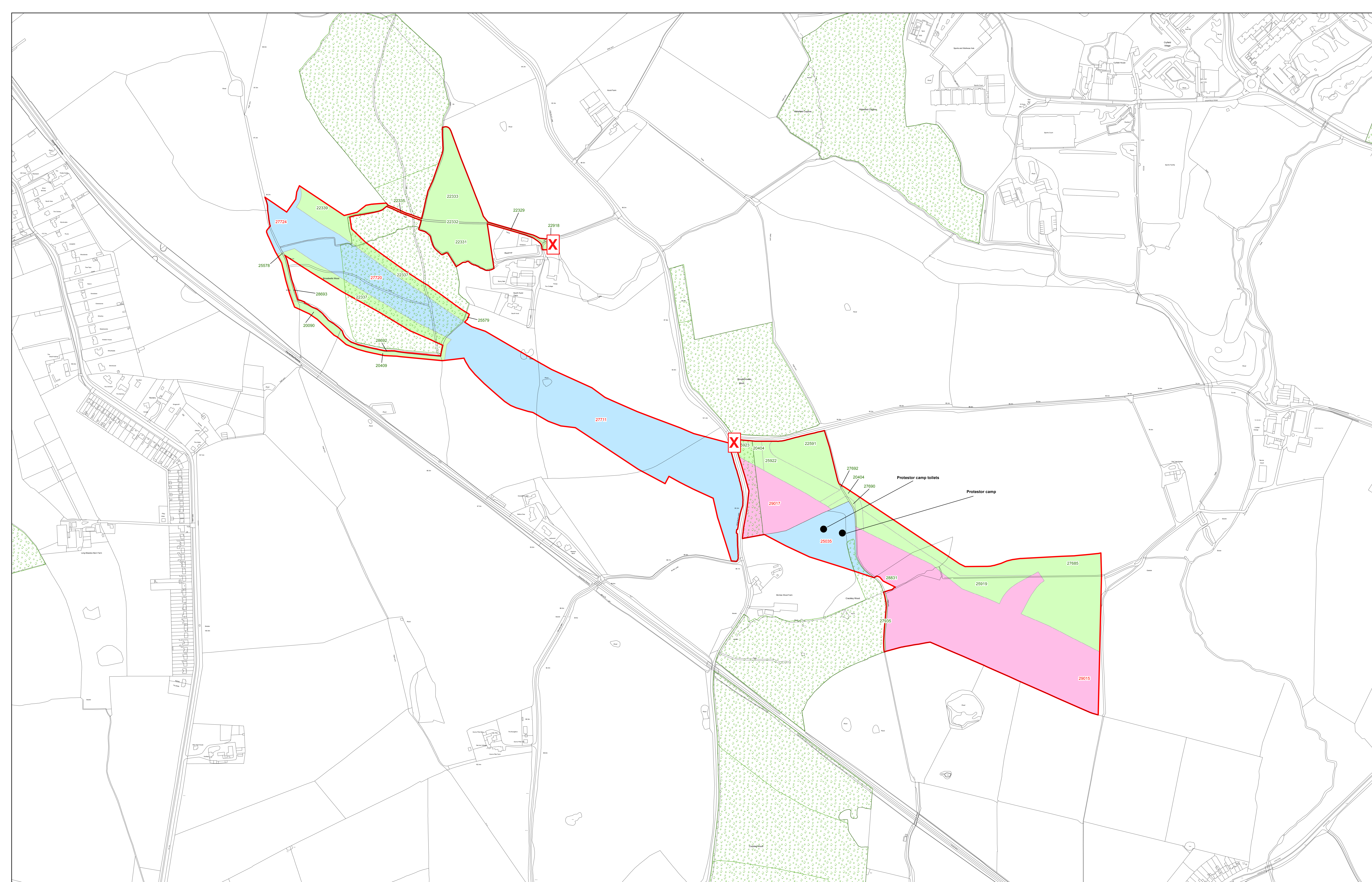


Scale at A0: 1:2,500



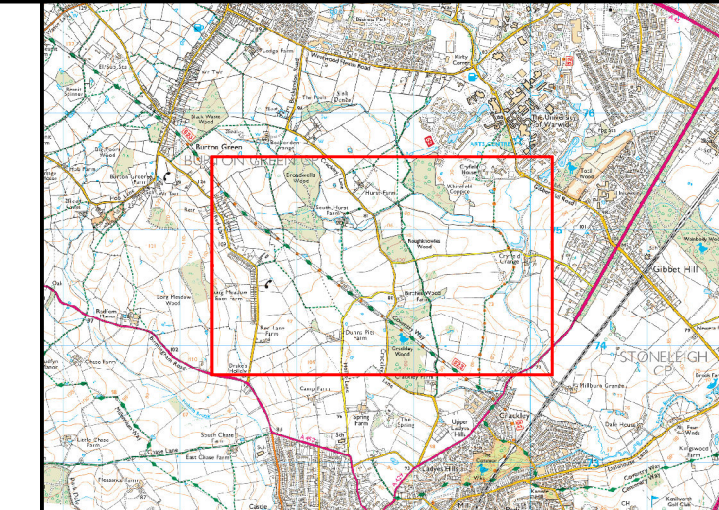
VS Doc Number:

Date: 12/02/2020
 ORIG-B-180

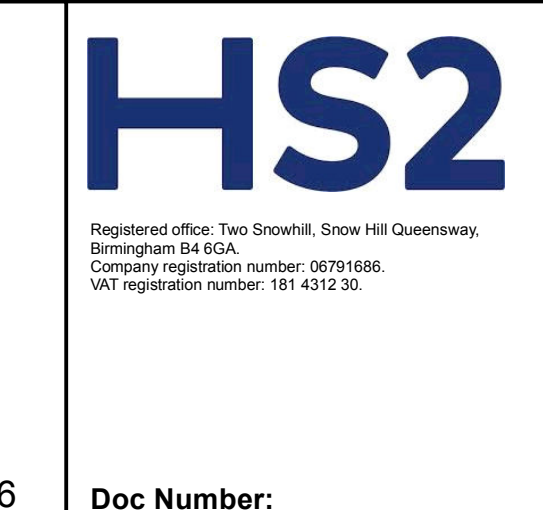


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- Protestor Camps
- Land Required
- Vested GVD
- Schedule 16 notice served and possessed
- Vested GVD registered to Secretary of State on HMLR register
- Ancient woodland



Plan B

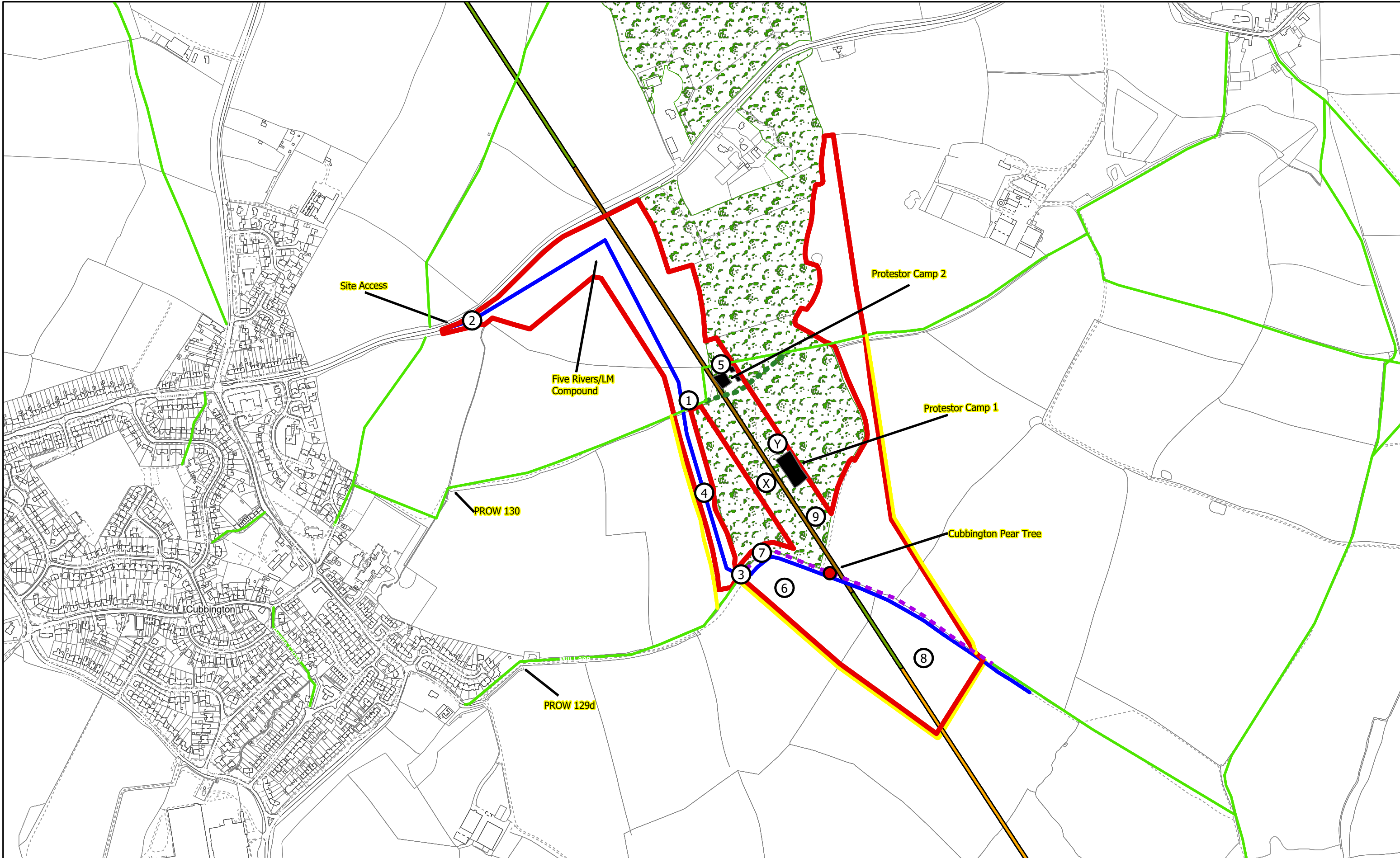


Scale at A0: 1:2,500

0 24 48 72 96 120 144 168 Metres

V6 Doc Number: Date: 19/02/2020

ORIG-B-181



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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

Working on behalf of **HS2**

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

0 55 110 220
Metres

ORIG-B-182 22/2/20

CUBBINGTON & CRACKLEY WOODS, WARWICKSHIRE
PHOTOGRAPHS OF ENCAMPMENTS



Gazebo around communal fireplace



ORIG-B-184



ORIG-B-185



ORIG-B-186



ORIG-B-187



ORIG-B-188









Persons unknown on
the Cribbington Land.

Tarpaulin Sheds on the
Crawley Land.





ORIG-B-194



Claim No: PT-2020-BHM-000017

PT-2020-BHM-000017

**IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
PROPERTY, TRUSTS AND PROBATE LIST
BIRMINGHAM DISTRICT REGISTRY
BEFORE: MR JUSTICE MARCUS SMITH
DATED: 10 NOVEMBER 2021**

BETWEEN:

**(1) THE SECRETARY OF STATE FOR TRANSPORT
First Claimant**

(2) HIGH SPEED TWO (HS2) LIMITED

Second Claimant

- and -

LARCH IAN ALBERT FRANK MAXEY

Defendant

FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANT

This order prohibits you from doing the acts set out in paragraphs 4 and 5 below. You should read it very carefully.

ORIG-B-195

UPON the parties having agreed to an order in the terms set out below; and

UPON the **Defendant** admitting that his actions in entering onto the Claimants' land at, inter alia, Crackley Woods and Cubbington Woods without the consent of the Claimants constituted contempt of court by breaching of the order of Mrs. Justice Andrews dated 17 March 2020; and

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

UPON the **Defendant** giving undertakings as set out below

IT IS ORDERED THAT:

1. The Claimants' application dated 27 August 2021 is dismissed;
2. The Defendant shall pay the Claimants' costs of the application dated 27 August 2021, agreed in the sum of £5,000, as follows:
 - a. £2,500 immediately on receipt of a sealed copy of this Order; and
 - b. £2,500 within three months of the date of this Order.

Both payments to be made to the Claimants' solicitors client account.

3. Service of this Order may be effected, as an alternative, by electronic means by email to Mr. Simon Natas of ITN Solicitors (the Defendant's solicitors) at snatas@itnsolicitors.com, and such service shall be deemed to be good and sufficient service on the Defendant.

UNDERTAKINGS TO THE COURT

In this Order the "**HS2 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).

ON the 8th day of November 2021, the **Defendant** gave undertakings to the Court promising as follows:

4. to comply with any order of a court in England and Wales which:
 - a. has been made in proceedings concerning the development of the High Speed Two railway in which the Secretary of State for Transport and/or High Speed Two (HS2) Limited are a party or are interested; and
 - b. prohibits (however phrased) entry upon any land by the Defendant (whether named as a defendant or as a "person unknown").
5. not to:
 - 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. pursue any course of conduct that amounts to criminal damage pursuant to section 1 of the Criminal Damage Act 1971;
- 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 intention of causing inconvenience and/or delay; and/or
 - ii. slow walking in front of vehicles with the object of slowing them down, and with the intention of causing inconvenience and/or delay; and
- g. climb onto or attach himself to vehicles or plant or machinery used by either Claimant;

in each case with an intention of damaging and/or delaying and/or hindering the Claimants by obstructing, impeding or interfering with the lawful activities undertaken by them or group companies, or contractors, sub-contractors, suppliers or service providers engaged by the Claimants, in connection with the HS2 Scheme.

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

Jones Hill Wood
3 October 2020

Tree platform

On the 3rd October 2020 HCE tree climbers were removing activists from an elevated tree platform at Jones Hill Wood – Upon removal 1 x activist managed to climb onto the outer cage of a Crane for approx. 2 x hours – After negotiation with High Court Enforcement Group and Thames Valley Police a secondary Crane was brought in and lowered the 1 x activist to the ground – He was then arrested.



HS2: Eco activist Swampy charged after tree protest

© 9 October 2020



GETTY IMAGES/PETER SUMMERS

| Dan Hooper, better known as Swampy is removed by police in Jones Hill Wood

Veteran eco warrior Swampy has been charged with trespassing after he and eight other protesters were removed from a tree on the HS2 route.

They had set up camp in a tree house in Jones' Hill Wood, between Wendover and Great Missenden, in Buckinghamshire.

Specially trained climbing officers scaled the tree to remove the group on Thursday.

Charges ranged from aggravated trespassing to breaching bail conditions.

The wood was the inspiration for Roald Dahl's children story *Fantastic Mr Fox*.

Swampy, 47, charged under the name Dan Hooper, was charged with aggravated trespass, along with four others.

- Alice Crawshawe, 21, of Egerton Road, Manchester
- Veronica Tombolan, 23, of Kings Lane, The Lee, Buckinghamshire
- Anne Kahn, 22, of Kings Lane, The Lee, Buckinghamshire
- Ella Russell, 25, of Kings Lane, The Lee, Buckinghamshire

All five have been released on bail, to appear in High Wycombe Magistrates' Court on 16 November.



| HS2 protesters occupied a tree within the boundary of HS2 owned land

Richard Fox, 29, of Fore Street, Yealmpton, Plymouth, was charged with obstructing/resisting a constable in execution of duty and was bailed to appear at the same court on 16 November.

A 38-year-old man from Wendover, Buckinghamshire, was arrested on suspicion of two counts of assault, criminal damage and possession of class B drugs and has been released under investigation.

Two others appeared at High Wycombe magistrates' court today accused of breaching bail.

Dana Patel, prosecuting, said that at previous hearing the two men had been bailed not to interfere with the workings on an HS2 site.

Newbury Green Party councillor Steve Masters of West Mills, Newbury was found not to have breached his bail from a previous protest.

He is also charged with aggravated trespass.

William Harewood 30, of Jones Hill Wood, Wendover, was charged with breach of bail.

His lawyer said he had been bailed on the condition of his address being the tree house, where he had been living for three months. He was found not to have breached the conditions.

He is also accused of aggravated trespass, criminal damage, assault, obstructing police and interfere/ misuse something provided to meet statutory health safety or welfare provision.

Both men are back in court on November 20.

Bowood Lane – Direct Action 07/04/21



Jones Hill Wood
09.04.2021

On 09.04.2021 activists located within the Jones Hill Wood protester camp attempted to pull down fencing at various locations around Jones Hill Wood – Fusion and SSS staff deployed to the areas that were being attacked and were assaulted whilst preventing activists from trespassing onto the HS2 Land side of the Fencing and damaging plant machinery.

Concurrently D36 and several activists blocked all traffic at Gate 4 which interlinks the HS2 Scheme sites of Jones Hill Wood and Durham Farm.

Thames Valley Police intervention was required with several arrests made.







9 April 2021 at 10:49:10 BST
30UXC5752533775

NCA – Jones Hill Woods 30/04/21



- Security Alert
- Security Teams Update
- OSCR Updated
- SFM and Securitas Sourcing PPE (stab vests)



ORIG-B-205



HS2 protesters dig tunnel to thwart Euston eviction

26 January



One protester said: "This is the only way I can effect change"

People campaigning against the HS2 rail project have dug a tunnel near Euston station, in a bid to prevent their eviction from a protest camp.

In September, members of HS2 Rebellion set up a Tree Protection Camp in Euston Square Gardens in central London to protest against the £106bn scheme.

They claim the tunnel is 100ft (30m) long and has taken two months to dig.

Activists say the tunnel - codenamed "Kelvin" - is their "best defence" against being evicted.

One protester, identified only as Blue, told the BBC: "It is all very dangerous and life-threatening but it is all worth it. This is the only way I can effect

change, I would sacrifice everything for the climate ecological emergency to not be happening."

The 18-year-old added: "We want to be as safe as possible. It is not about us martyring ourselves, it is about delaying and stopping HS2."



Demonstrators have previously built tree houses and scaled cranes near the HS2 Euston site

A spokeswoman for HS2 said tunnel protests were "costly to the taxpayer".

She added: "These are a danger to the safety of the protesters, HS2 staff, High Court enforcement officers and the general public, as well as putting unnecessary strain on the emergency services during the pandemic.

"Safety is our first priority when taking possession of land and removing illegal encampments."

- **When will HS2 open and how much will it cost?**
- **HS2: Anger, frustration versus promises of progress**

British Transport Police said it was aware of the tunnel but it was a matter for the Met Police, which said no complaint yet had been made.

HS2 is set to link London, Birmingham, Manchester and Leeds. It is hoped the 20-year project will reduce rail passenger overcrowding and help to rebalance the UK's economy.

The campaign group alleges HS2 is the "most expensive, wasteful and destructive project in UK history" and that it is "set to destroy or irreparably damage 108 ancient woodlands and 693 wildlife sites".

However, HS2 bosses have said seven million trees will be planted during phase one of the project and that much ancient woodland will "remain intact".



Seasoned activist Daniel Cooper - better known as Swampy - has been at Euston supporting the campaigners

Transport Secretary Grant Shapps told MPs in September that the first phase of the high-speed rail link between London and Birmingham **would not open until 2028 at the earliest.**

The second phase, to Manchester and Leeds, was due to open in 2032-33 but that has been pushed back to 2035-40.

Network Rail, which owns the land, has been approached for a comment about the tunnel.



HS2 protester Dr Larch Maxey said the tunnel was "warm and quiet"

Analysis

By BBC London's transport correspondent Tom Edwards

Tunnelling as a form of environmental protest has a long history in the UK.

In the 1990s it was one of the ways that pushed environmental concerns into the headlines and changed perceptions.

In one of the environmental protesters' tunnelling guides, written by "Disco Dave", it says:

"In the world of NVDA (non-violent direct action) there are few defence tactics that can compare with the protest tunnel. Dangerous, laborious and time consuming, tunnelling is the ultimate and desperate tactic of desperate people in desperate times."

The first protest tunnel goes back to the M11 and 1993 but they only really developed during the Newbury Bypass protests in 1996.

Protest tunnels against the A30 in Devon and Manchester Airport's second runway then followed.

Not only did they make household names of environmental campaigners like "Swampy" but they arguably changed transport policy - road-building reduced massively.

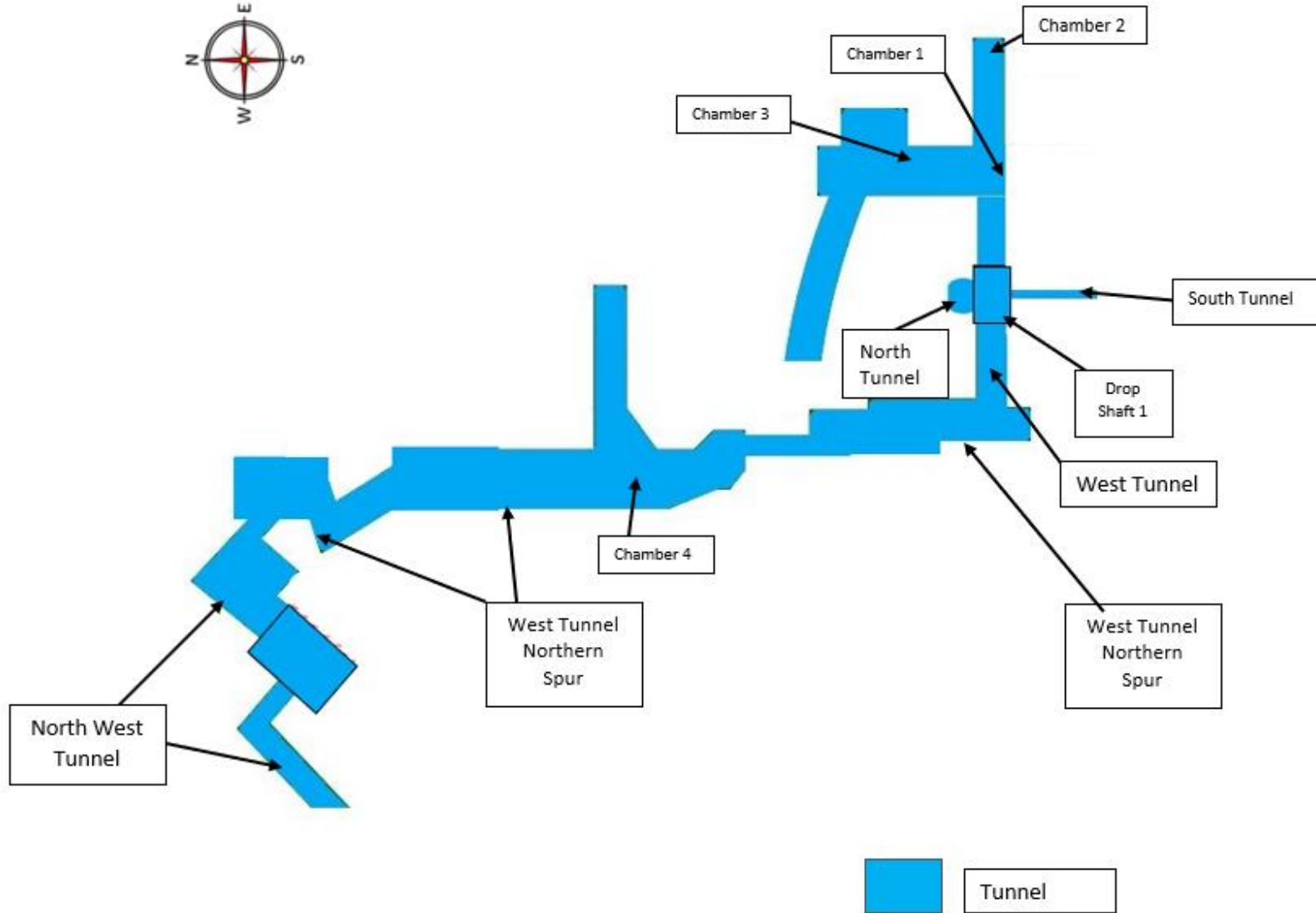
We have seen tunnels more recently in 2017 in Coldharbour in Surrey in a protest against fracking so it's not a massive surprise we are seeing tunnels again.

Tunnelling in particular as a direct action slows down developers and it is expensive to dig out protesters safely.

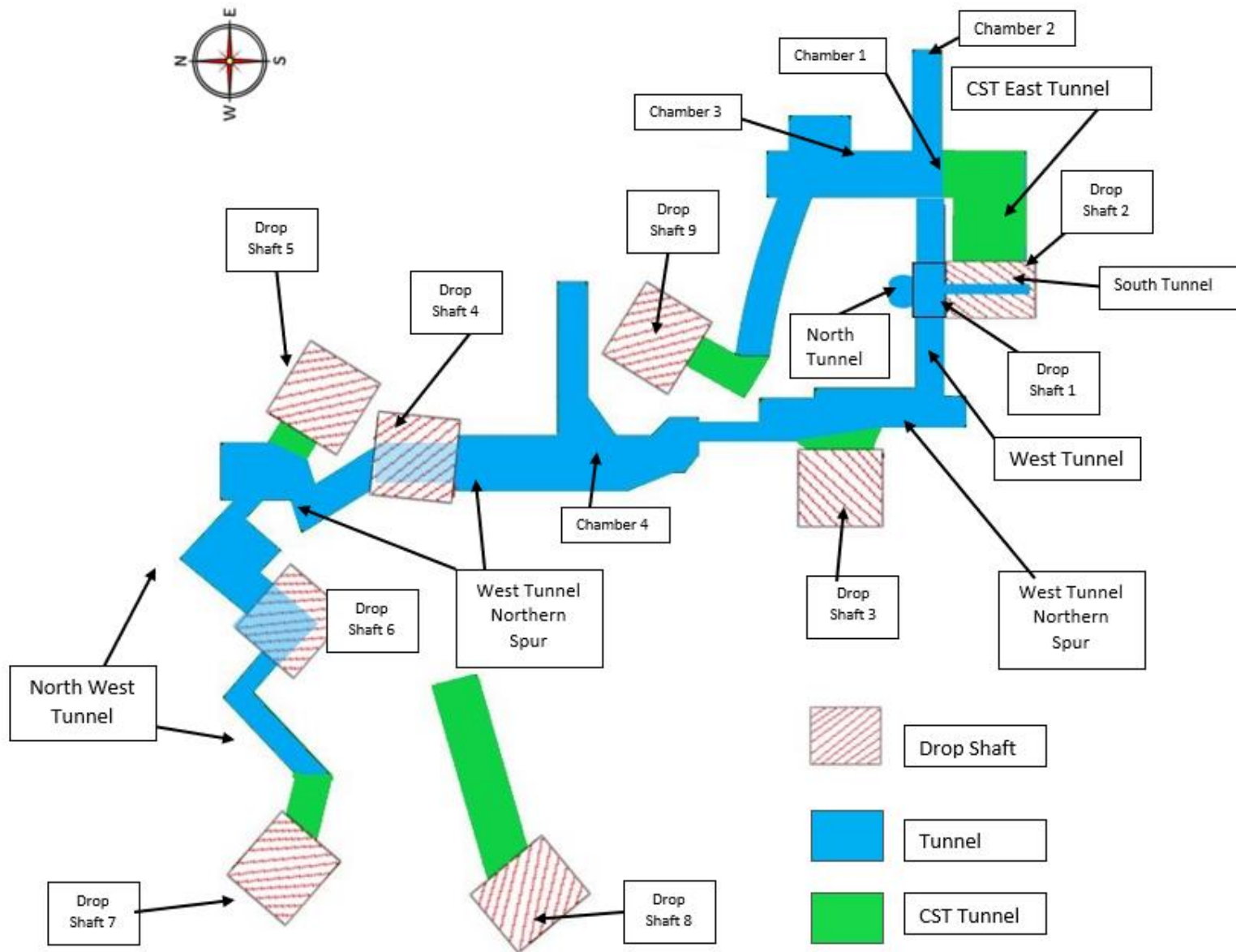
Disco Dave wrote: "That ultimately is the purpose of tunnels and tree houses. To act as a deterrent warning the authorities that should they decide to evict, then it will hurt them where for them it hurts most - in the pocket."

What will be interesting is if these tunnels have the same impact on HS2 as they did on the road-building programme of the late 1990s.

Will it reframe HS2 so it will be seen in the same way as fracking or road building? Or can the argument still be made that it is a low-carbon form of travel even though it does cause some destruction of habitat?

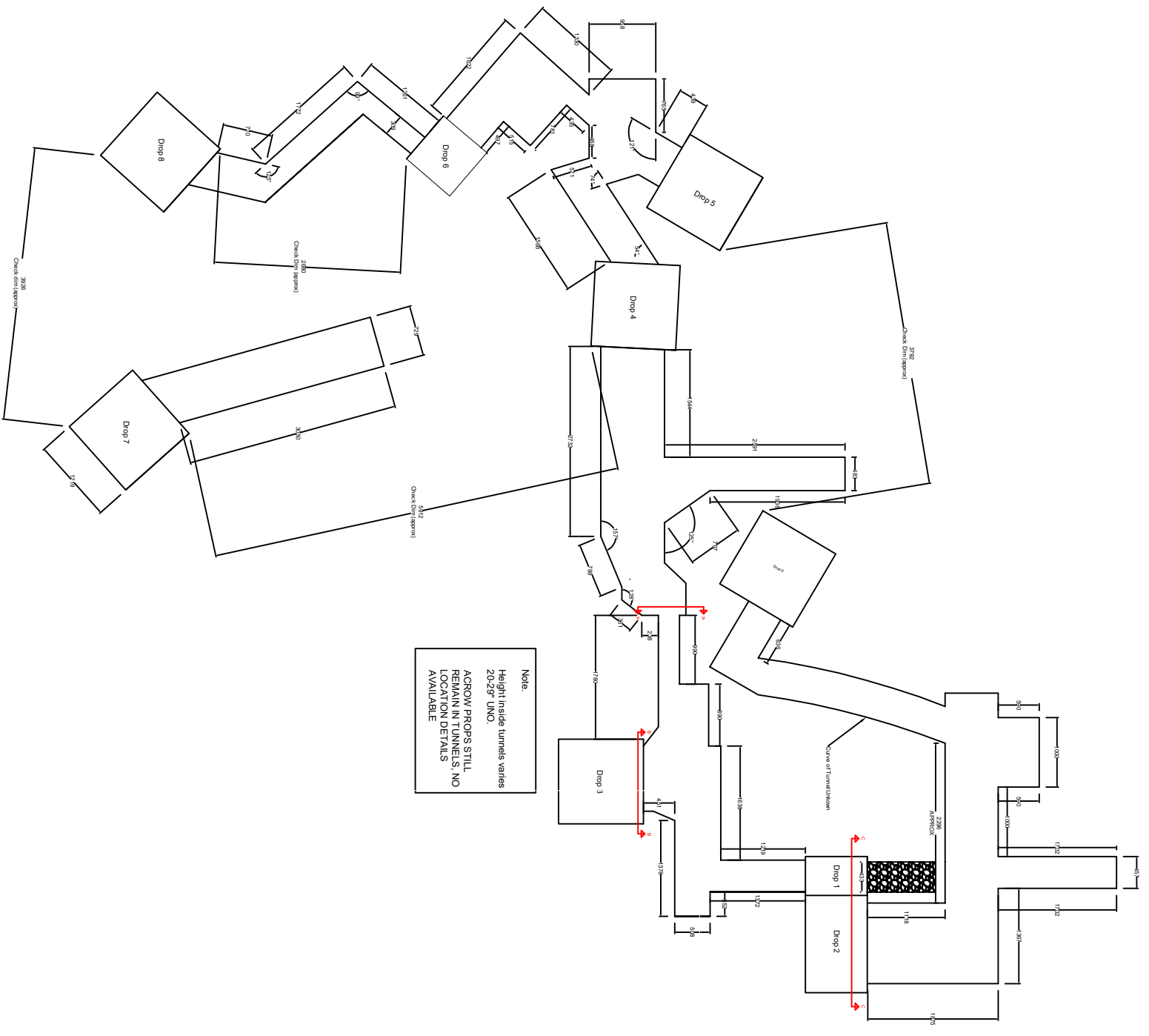


PLAN 2 – COMPOSITE PLAN SHOWING ALL TUNNELS AND DROP SHAFTS

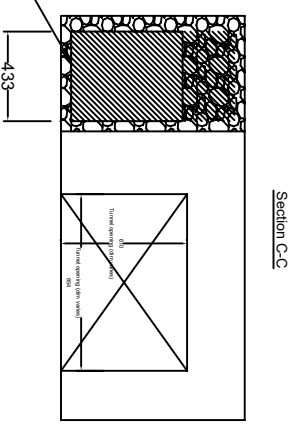
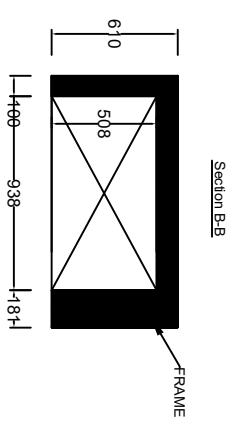
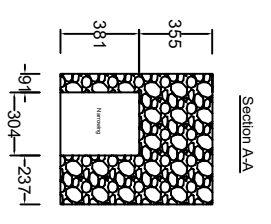


- Notes:**
1. THE COPYRIGHT OF THIS DRAWING IS VESTED IN NATIONAL EVICTION TEAM AND IT MAY NOT BE REPRODUCED IN WHOLE OR PART.
 2. DIMENSIONS ARE GUIDE ONLY FULL SITE SURVEY REQUIRED.
 3. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT DRAWINGS.
 4. SHANT POSITIONS ARE APPROXIMATE GPS DATE OVERLAY RECOMMENDED.
 5. ALL DIMS ARE APPROXIMATE.

ORIG-B-212



Note:
Height inside tunnels varies 20.23' UNO.
ACROW PROPS STILL REMAIN IN TUNNELS. NO LOCATION DETAILS AVAILABLE



NATIONAL EVICTION TEAM
National Eviction Team
Marine House,
2 Marine Road,
Colwyn Bay,
LL29 8PHK.

CLIENT: HS2
Contractor: NET

SITE: Euston Square Gardens

TITLE: Tunnel Layout

SCALE AT A3: NTS.	DATE: 02/03/21	DRAWN: JN	CHECKED:
PROJECT NO: 001	DRAWING NO: 001	REVISIONS:	

EUSTON SQUARE GARDENS TUNNELS





ORIG-B-214



ORIG-B-215



ORIG-B-216



ORIG-B-217



ORIG-B-218



ORIG-B-219





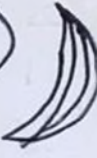
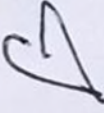



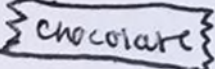

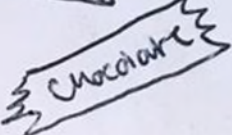

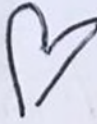
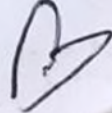
ORIG-B-220



ORIG-B-221

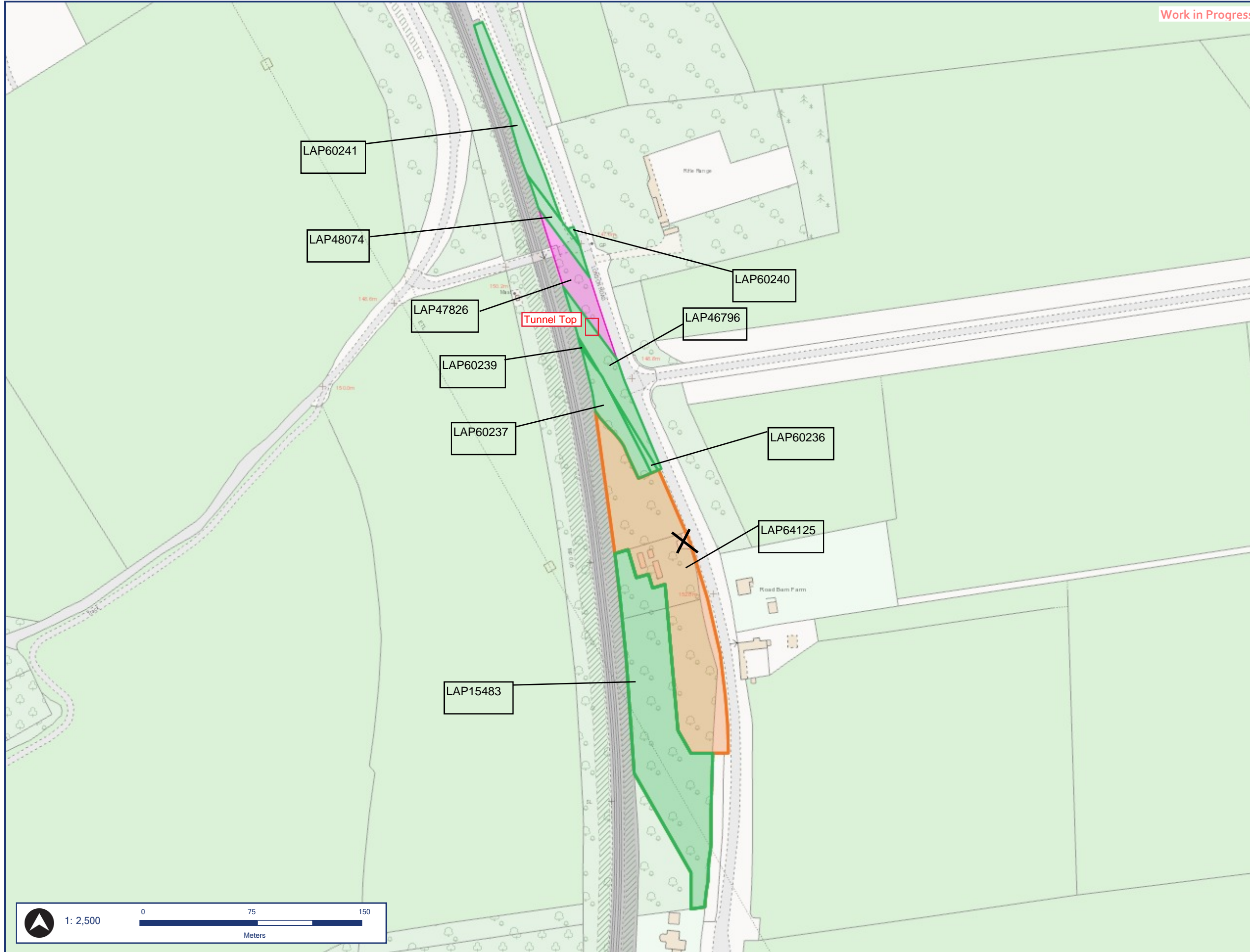


ORIG-B-222

To Brett's   
 Tunnel  
Team 
     

Dear Brett's A team,
Happy valentines day!
Thank you for always
being there for us in
the down shaft even though
we know it must be
hard and cold & wet
sometimes. To be honest,
you're very close to
the best tunnel team
any of us has ever
been evicted by. (it
would be better if we
could get some food tho)
We have an extra
special surprise coming
up for you so be
careful where you dig!
Loads of love,
Blue, Nemo,
& Lark x
Dan - Swampy
The Rat

Work in Progress



- Green area - Schedule 16 land
- Pink area - GVD land
- Orange area - Lease land
- X - Obstruction of access

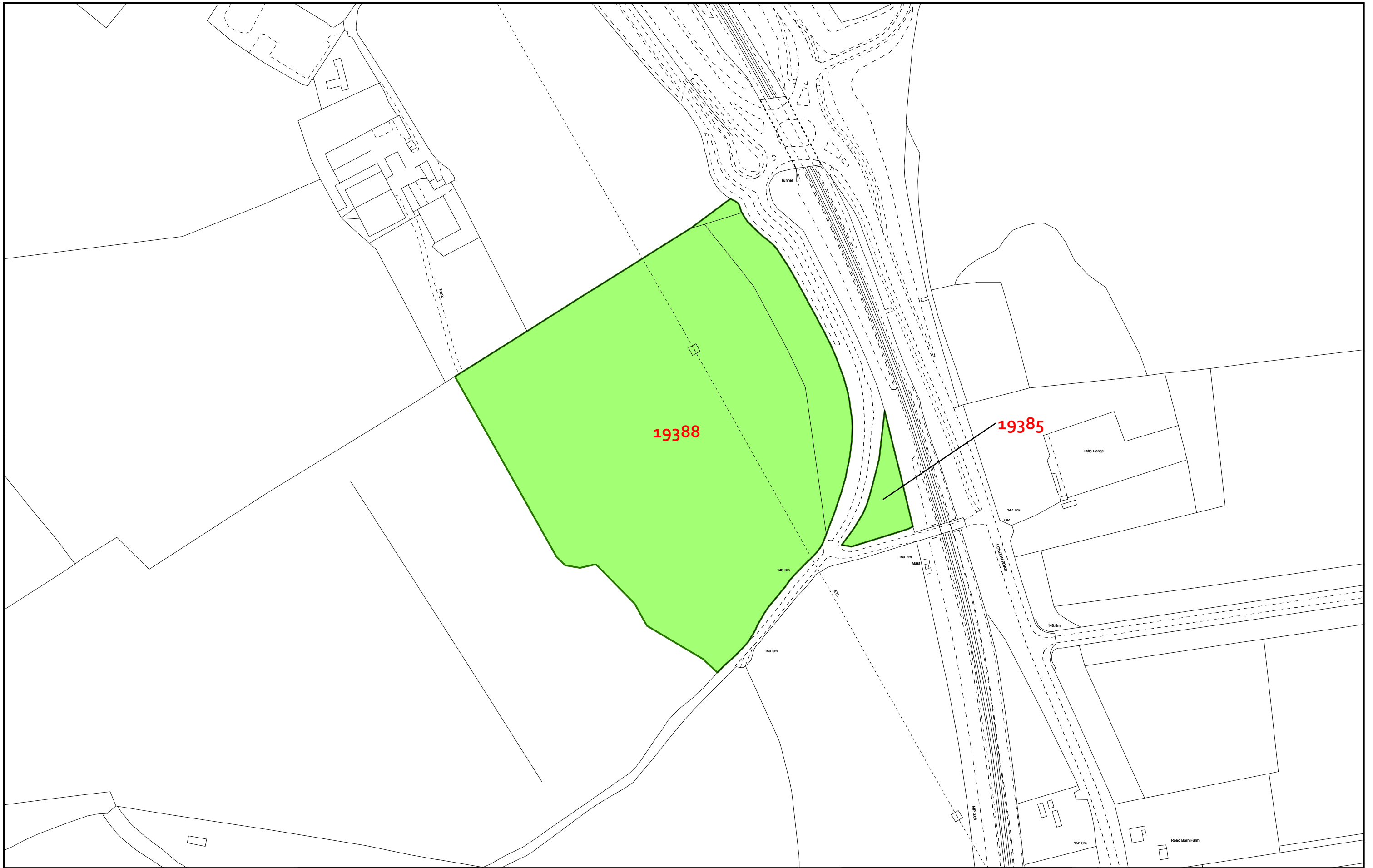


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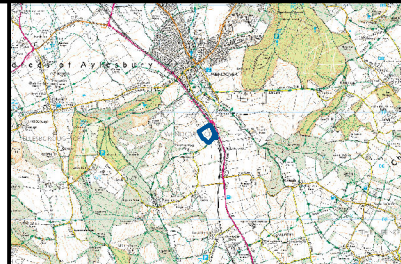
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- Land Subject to Temporary Possession (Exclusive)
- Land Subject to Temporary Possession (In Common)



Rev	Date	Description	By	Ckd	App
0.1	10/07/2018	N-038378	VM	MW	HU

Map Name
Temporary Possession Plan
 Notice Number: N-038378
 LAA ID: C212_026
 [Redacted]

District/Borough:
 Aylesbury Vale

Registered in England. Registration number 06791686.
 Registered office: 2 Snowhill, Queensway,
 Birmingham B4 6GA.

Sheet 1 of 1

Scale at A3: 1:2,500

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 Doc Number: HS2-HS2-GI-TEM-000-000024

ORIG-B-226

WAR Camp - Wendover



WAR Camp - Wendover



WAR Camp - Wendover



WAR Camp - Wendover



WAR CAMP



WAR Camp



WAR Camp



WAR Camp - Wendover

War Camp



Gate to War Camp



Tower at War Camp



WAR Camp - Wendover

Tower North of Camp



Pallet Fence - North of Camp



Perimeter



WAR Camp - Internal

Internal



Internal



Internal



WAR Camp - Internal

structure



structure



structure



WAR Camp - Internal

garden



building



structure



WAR Camp - Internal

barrier



structure



structure



WAR Camp - Internal

waste



structure

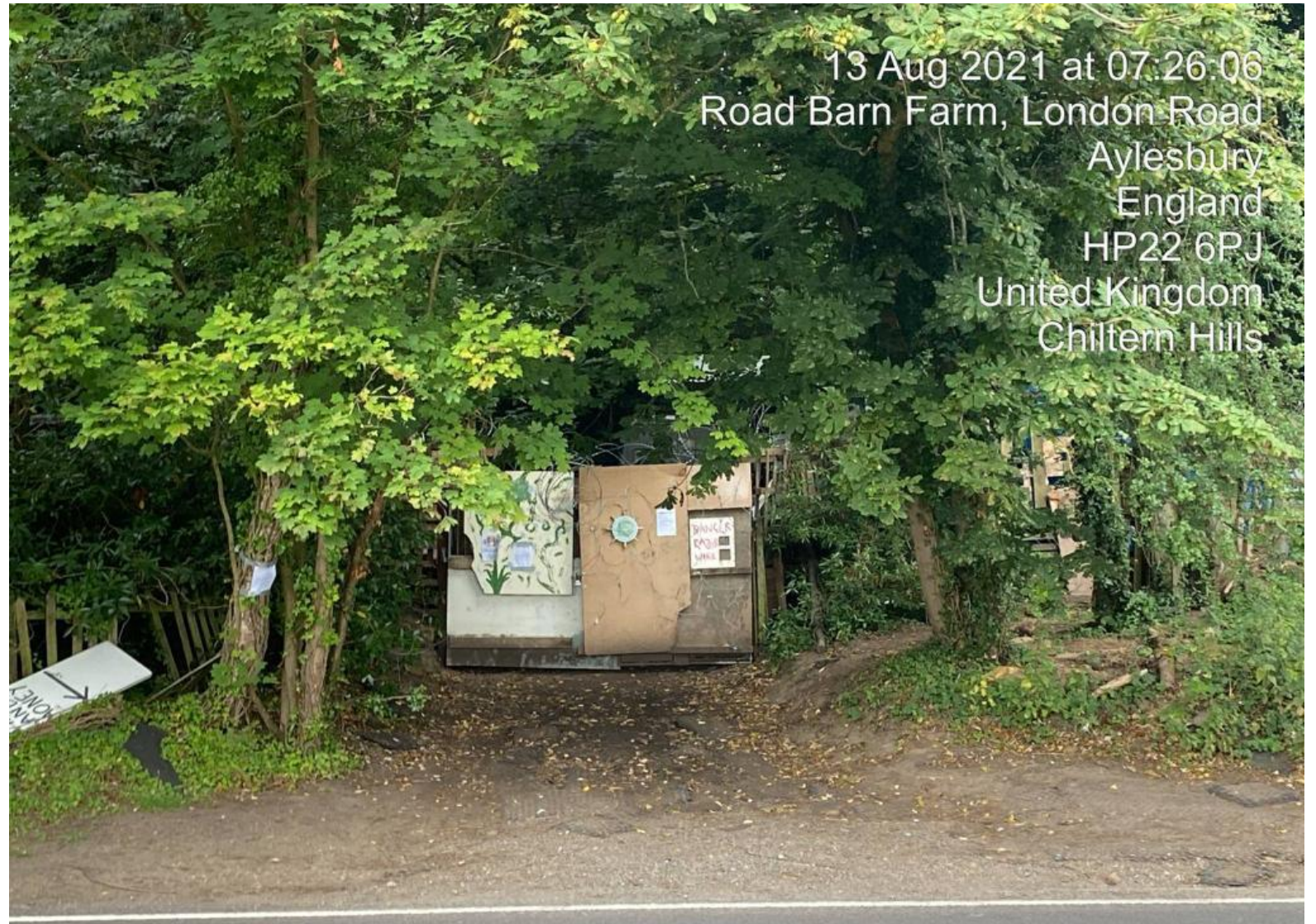


structure

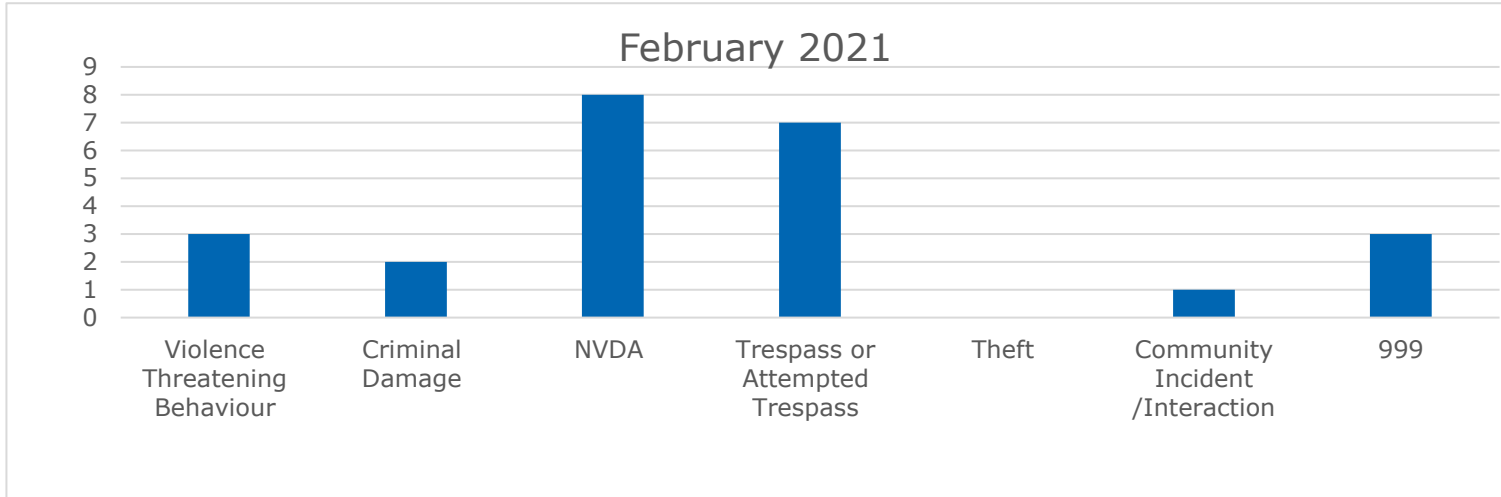
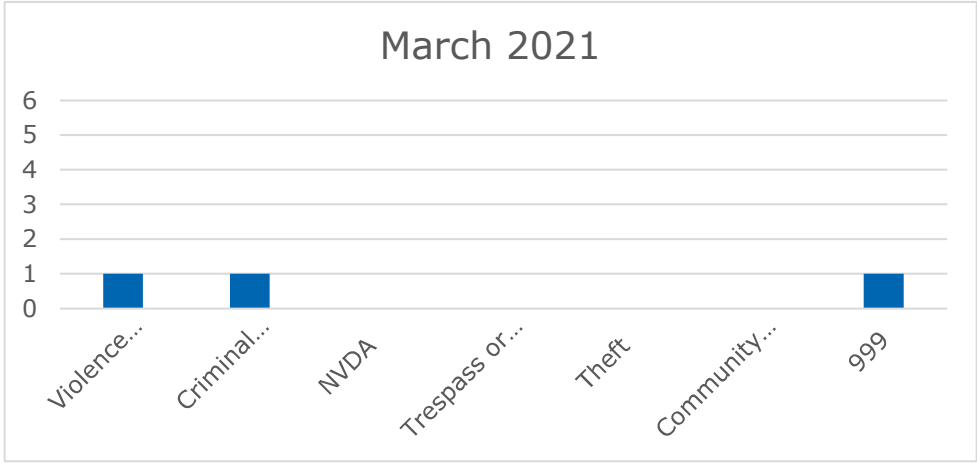
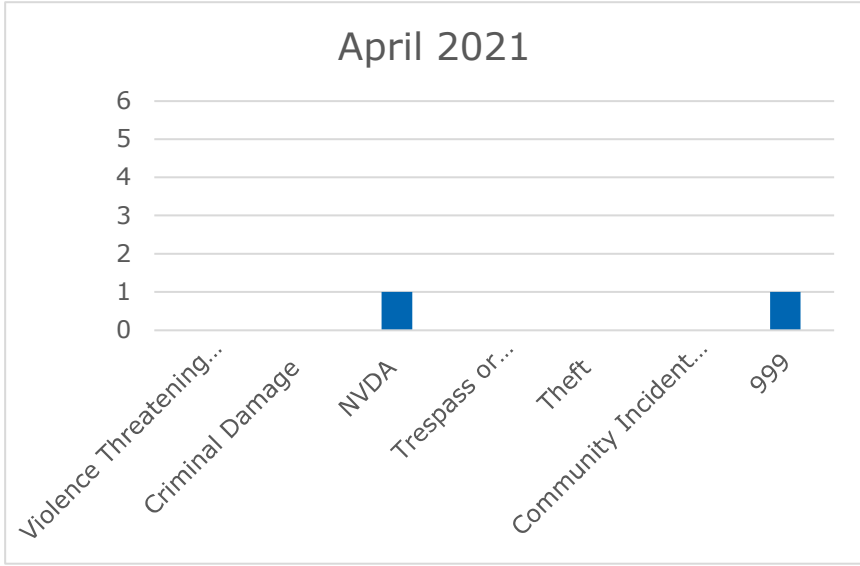


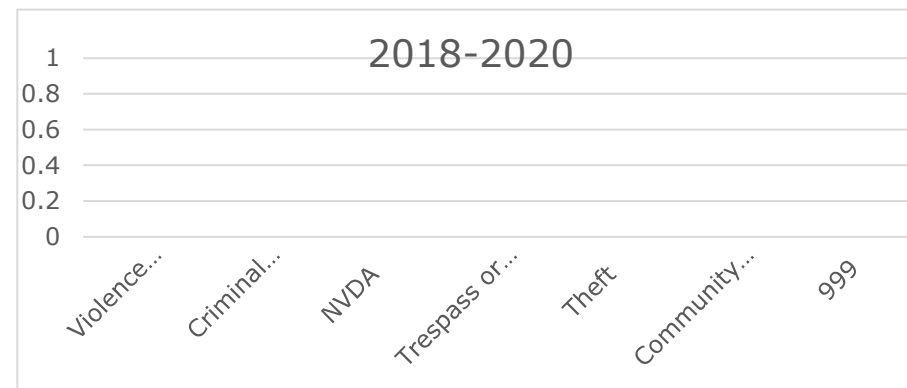
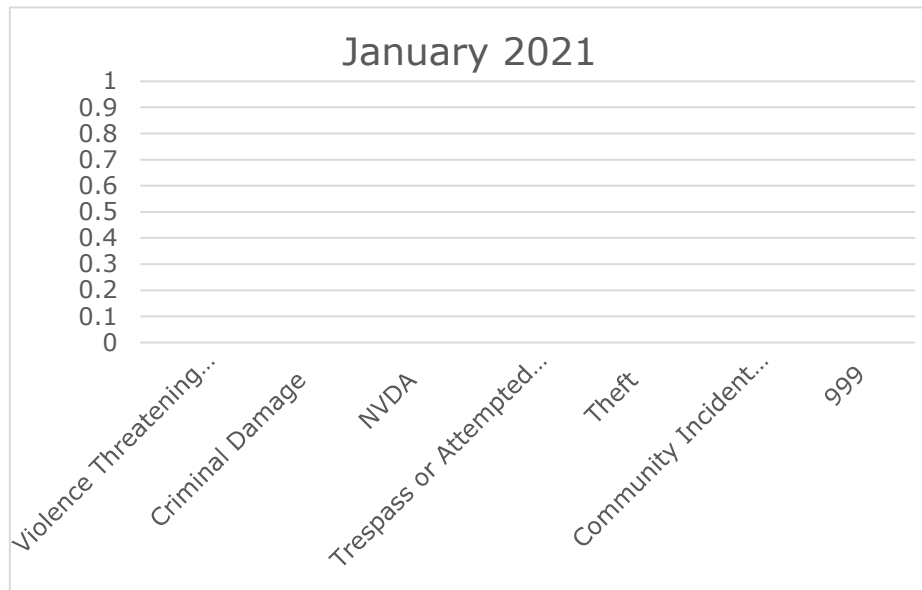
WAR Camp

Front gate

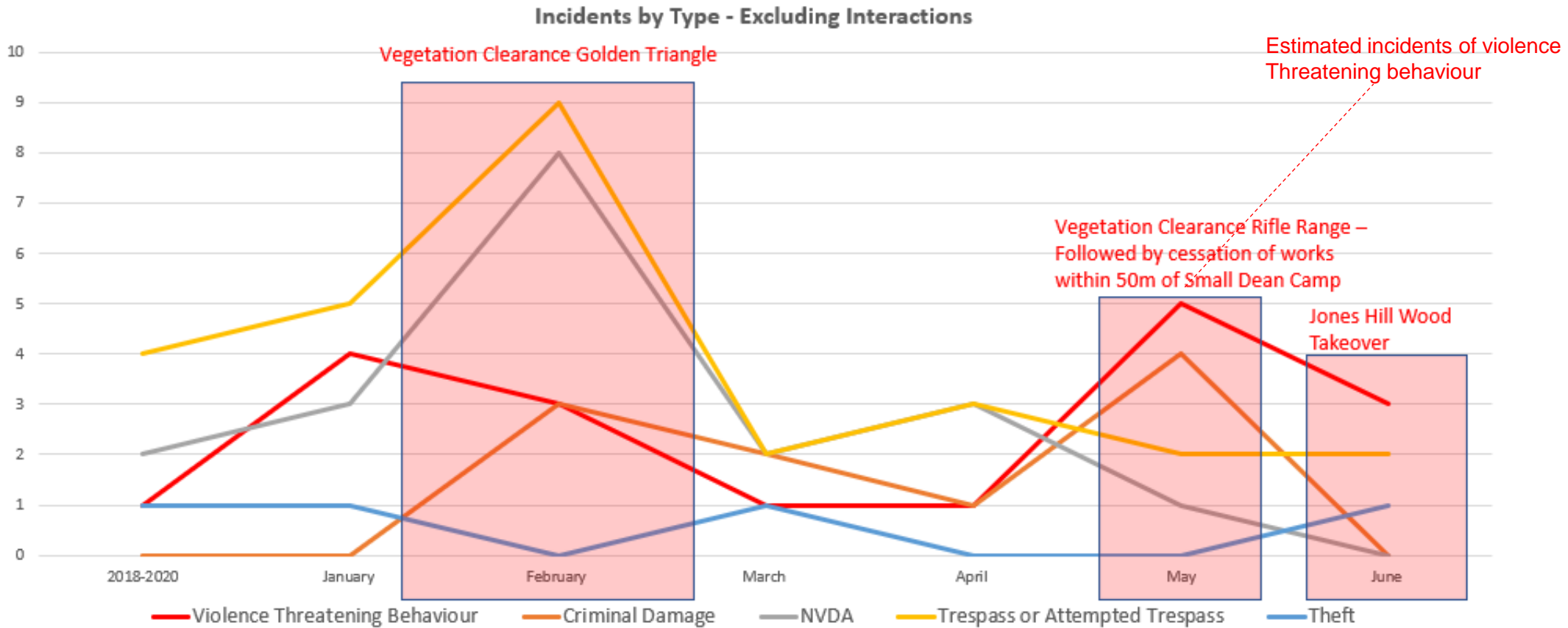


13 Aug 2021 at 07:26:06
Road Barn Farm, London Road
Aylesbury
England
HP22 6PJ
United Kingdom
Chiltern Hills





Security Incidents



- Golden Triangle and Rifle Range are located at Small Dean Viaduct
- 50m exclusion zone has reduced incidents at Small Dean in June, however works will need to resume.
- Jones Hill Wood still seeing incidences of stone throwing
- Jones Hill Wood handover completed – review of forecasted numbers



HORACE Ref	Date of Incident	Impact Category	Incident Level	Location	Area	Brief Description of Incident	Violence Threatening Behaviour	Criminal Damage	NVDA	Trespass or Attempted Trespass	Theft	Community Incident /Interaction	999	
							3	0	0	2	1	3	3	
INC09946	03/06/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At approx. 12:00 hrs 4 x males jumped over the entrance gates of the Boswell Estate from the inside onto HS2 possessed land and headed towards Small Dean Protestor Camp. The males were believed to be using this route as a shortcut from the rear of the Boswell Estate to Small Dean Protestor Camp. No damage or interaction with the security team.				1				
	May						5	4	1	2	0	1	5	
INC09905	27/05/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At approx. 21:30 hrs a security vehicle conducting welfare checks of security officers was stopped by an unknown male in way of being in the middle of the road on Rocky Lane and 5 more individuals on the verge. Security officer asked for the male to move out of the highway for their safety and of others and he refused. The male and the rest of the individuals were recognised to be from the Small Dean Protestor Camp. Police were called and all individuals left and headed towards Small Dean Protestor Camp. .			1			1		
INC09763	12/05/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	At c.1600hrs, 7 protestors from the Small Dean Protestor Camp arrived at the entrance to the Rifle Range, all wearing white overalls and started to throw balloons filled with solid and liquid at the security officers. The protestors headed towards a private driveway where they further attacked security officers with the filled balloons (one balloon did make contact with a security officer). It is believed the balloons had been filled with urine, faeces and possibly vinegar. No injuries sustained.	1						1	
INC09743	09/05/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	3 protestors from Small Dean Protestor Camp tried to access Small Dean Viaduct Launch compound via a gap within the fence line which was believed to have been cut during the night. Security officers intervened and stopped the trespass. Protestors then returned to camp and security temporarily secured the gap		1			1			
INC09742	08/05/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	A protestor from the Small Dean Protestor Camp approached the fence opposite the camp entrance and shook the CLD (mesh & block fencing) trying to pull it down. Moments later the protestor returned to camp. A short while later, a blue laser light was pointed from the Camp onto the security officers located within the fence line of the Rifle Range site. Further to this, golf balls were used as projectiles from the camp (no person struck). The Security officers retreated to safety. No injuries sustained.	1	1			1		1	
INC09741	07/05/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	A protestor from the Small Dean Protestor Camp approached the fence opposite the camp entrance and shook the heras fence trying to pull in down. Moments later the protestor stopped and returned to camp		1						
INC09705	05/05/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	At c.2330hrs on 5th May, projectiles were thrown from the Small Dean Protestor camp aimed at the EKFB security staff. This assault continued for a period of 30mins. The security team moved behind the fencing for their own safety, contacted the Police and escalated to the OSCR. No injuries sustained. No damage to equipment.	1						1	
INC09685	04/05/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	At approx. 1530 hrs it was reported that some golf balls were being thrown at staff working in the area from the Small Dean Protestor camp. One member was hit on his right arm but no injuries reported. Works were then stopped for the day.	1						1	
INC09690	04/05/2021	Physical / Personal Security	Level 3	[C2] Small Dean South Embankment	NCA	EKFB had planned on carrying out de-vegetation works, however at c.22:00hrs activists from Small Dean Protestor camp began to block access to sites in the area and damaged sections of heras fencing. The activists also caused a nuisance to the Traffic Management operatives who were installing a lane closure on the A413 to facilitate the works. The Police were called and attended site and as soon as they left the protestors started to catapult large chalk projectiles towards the staff and as a result broke passenger side window on a vehicle. The Police did return to the site. Decision was made to stop/ postpone works. The catapulting of projectiles continued throughout the night until early hours of the morning. No injuries were sustained.	1	1					1	
	April						1	1	3	3	0	0	3	
INC09479	07/04/2021	Physical / Personal Security	Level 3	[C2] Wendover Dean Viaduct	NCA	On 7th April at the junction of Bowood Lane and Kings Lane (Wendover) c.5 activists deployed and attached themselves to a lock-on device. They were removed by EKFB security when then inadvertently unlocked their device. Disruption was less than 2hours.				1			1	
	March						1	2	2	2	1	1	1	
	26/03/2021	Physical / Personal Security	HPO	[C2] Small Dean Viaduct	NCA	8 Security Officer Assaulted	1	1					1	
	February						3	3	8	9	0	1	4	
INC09082	20/02/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	On the 20th Feb at approx. 23:00 hrs a group of 6 protestors, believed to be from Wendover Active Resistance camp, arrived at the entrance of Small Dean compound. 1 of the female protestors attempted to trespass onto HS2 land and was stopped by security using open palm technique. The female immediately turned violent and attacked the security officer by punching him in the face, security officer did not sustain any injuries. Police were present at scene and arrested the female immediately for common assault. Following from the arrest approx. 10-15 more protestors arrived and were hostile and aggressive immediately. The protestors left approx. 45mins after heading towards the camp. All security and police officers remained professional throughout. The protestors were believed to be under the influence of drugs and alcohol.	1							1
INC09015	13/02/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	At approx. 01:15hrs on Small Dean Lane approx. 20-25 protestors believed to have been from the Wendover Active Resistance Camp tried to breach the Small Dean Compound. The protestors managed to damage the entire fence line of heras fencing and breached the site. The protestors during this were verbally abusive towards the security staff including throwing rocks at them. The protestors shortly after left the site and headed towards the direction of the camp. Police attended the scene. Security officers remained professional at all time. No injuries to any staff reported.	1	1			1		1	
INC08945	05/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 11:32hrs 4 protestors (1 x female and 3 x males) known to be residing in the nearby Wendover Action Resistance camp were observed taking photos of the fence line and adjacent 'Badge mitigation' within the fence line of the Small Dean Compound. 2 x security officers made their way over to the group as they approached it was noticed that 2 of the males had captured images of the Heras fencing being stored approximately 2 metres on the other side of the fence on their mobile phones. The 2 x security officers engaged with the group and in a polite and professional manner they enquired if they could be of any assistance, to which one of the males replied 'No' the group then made their way back in the direction of the Wendover Action Resistance camp.				1				
INC08918	03/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 12:30hrs 1 x male protestor known to be residing in the nearby Wendover Action Resistance camp was observed photographing the welfare cabins and fencing within the compound whilst standing from kerbside boundary of Small Dean Land highway. The security within the compound relocated the canine unit to the area being photographed, whereby the protestor ceased taking photos and returned in the direction of the Wendover action resistance camp.				1				
INC08919	03/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 13:20hrs 1 x female protestor known to be residing in the nearby Wendover Action Resistance camp was observed/ overheard talking into her phone describing the size of the trees overhanging and fencing type running along the southern side of the compound in line with Small Dean Lane. The security officers approached her in a polite and professional manner advising her of an oncoming vehicle, at which point, she put her phone in her pocket and started to walk back in the direction of the Wendover resistance camp.				1				
INC08920	03/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 15:00hrs two protestors (1 x female and 1 x male) known to be residing in the nearby Wendover Action Resistance camp were observed taking the registration numbers of vehicles stored within the overflow car park for Small Dean Lane compound. The external security engaged with them in a polite and professional manner informing to enquire if they needed any assistance, the two protestors made no comment and returned in the direction of the Wendover Action Resistance camp.				1				
INC08921	03/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 15:25hrs two protestors (1 x female and 1 x male) known to be residing in the nearby Wendover Action Resistance camp were observed attempting to enter the area cleared of vegetation on Saturday/Sunday 30th/31st, through the hedge-line just south of the layby situated on Small Dean lane. The external security started to make their way towards their location at which point the two protestors moved away in the direction of Grove Farm (Wendover).					1			

HORACE Ref	Date of Incident	Impact Category	Incident Level	Location	Area	Brief Description of Incident	Violence Threatening Behaviour	Criminal Damage	NVDA	Trespass or Attempted Trespass	Theft	Community Incident /Interaction	999
INC08922	03/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 16:10hrs three protesters (2 x female and 1 x male) known to be residing in the nearby Wendover Action Resistance camp were observed entering land under the possession of HS2 with climbing equipment and a tarpaulin. EKFB Security asked for three protesters to vacate the area as it was under possession to HS2. The three protesters refused to leave and started laying out the ropes and tarpaulin in an attempt to climb the tree. The security requested that they cease what they were doing and again requested that they vacate the area as it was under possession of HS2. A short while later a fourth protester (1 x male) arrived and started to become abusive, the security officers asked that he refrain from using foul language, and again requested that they vacate the area. The protesters were shown the documentation detailing the lawful possession of the land and again requested that they vacate the area. This group was then joined by an additional 7 protesters (2 x females & 5 x males) at which point the group became abusive and aggressive towards the security team. Due to the loss of daylight the security team withdrew to the PWoV keeping the group under observation at which point the protester incident line was contacted and a full overview of the situation given. At 17:08hrs the protesters started to vacate the area in the direction of the Wendover Action Resistance Camp. The IRT were cancelled and the security officers returned to the main compound. The EKFB security team remained polite and professional at all times.	1		1	1			
INC08907	02/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	New protestor camp set up on HS2 possessed land. The camp is approx. 150 metres from Wendover Active Resistance Camp. Currently the number of occupants of the camp fluctuate between 4 to 8 protestor at a time. No engagement has taken place as of yet.				1	1		
INC08916	02/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	On Tuesday 2nd February at 14:30hrs as a HGV was departing Small Dean Lane compound at slow speed a male protester known to be residing in the nearby Wendover Action Resistance camp stepped out from the verge directly in front of the vehicle and proceeded to walk at a slow pace towards the junction of the A413. The security officers asked him to allow the vehicle to pass to which he refused stating it was his right to walk at a speed that suited him. The protester reached the junction of the A413 and was advised of the dangers of attempting to walk into the traffic, the protester stopped briefly, then moved to the side allowing the HGV to exit Small Dean Lane and enter the roundabout on to the A413. The protester then started to make his way back along Small Dean Lane and headed up the PRoW in the direction of the Wendover Action Resistance camp				1			
INC08917	02/02/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	On Tuesday 2nd February at 16:18hrs whilst a ASRM (Area Security & Resilience manger) for EKFB was entering his vehicle parked in the layby on Small Dean Lane a stone hit his window screen resulting in a crack measuring 5cm to the side of the screen next to the window strut. The ASRM looked in the direction of where the stone had come from, however due to the location of the woods with the exception of the protester situated in the tree, he could not see any other person, and not wishing to antagonise the protester he moved his car to the safety of the compound.		1					1
INC08891	01/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 09:00 hours two protesters (1X female, 1X male) known to be residing in the nearby Wendover action resistance camp were observed photographing videoing the site activities from the PRoW				1			
INC08892	01/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 10:30 hours two protesters (1 x female, 1 x male) known to be residing in the nearby Wendover action resistance camp were observed in land possessed by HS2 security approached and in a polite manner asked for two protesters to vacate the area as it was under possession to HS2					1		
INC08893	01/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	13:00hrs two protesters two protesters (1 x female, 1 x male) known to be residing in the nearby wind over action resistance camp were observed entering land under the possession of HS2. The male was observed to be carry a Tree saw the security engaged with them in a polite and professional manner informing them that they were on land under the possession of HS2, the male protester became abusive and aggressive towards the security officers, the officers informed the protesters in an assertive and professional manner to leave the area, both protesters departed the area of the own accord and returned to the Wendover Action Resistance camp					1		
INC08903	01/02/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	At approx. 2230hrs on the 1st February 2021 at Small Dean Compound entrance 6 x protesters believed to be from the Wendover Active Resistance camp approached the entrance gate and asked about what works were taking place at the woodland opposite the compound. Security team advised that no planned works were taking place. The protestors said that they did not believe this and 3 of the protestors headed towards the woodland opposite the compound, whilst 3 remained at the entrance gate. Shortly after it was noticed that there were some lights up in the trees and the protestors at the gate mentioned that they knew that HS2 were planning on fencing that woodland and that they would stop this at any cost and that they had a few of the protestors in the trees. At around 2310 the protestors left the entrance and headed towards the camp leaving the protestors in the trees. Unable to confirm numbers due to darkness. Security officers remained professional throughout							1
INC08906	01/02/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At 15:00hrs six protestors (3 x female, 3 x male) known to be residing in the nearby Wendover action resistance camp refused to leave the land under the possession of HS2. The EKFB Security Team requested the assistance of the IRT. The EKFB Security team remained polite and professional throughout. After 1.5hrs the six protestors departed the land making their way back to the Wendover action resistance camp					1		
	January						4	0	3	5	1	15	3
INC08887	31/01/2021	Physical / Personal Security	Level 4	[C2] Small Dean Viaduct	NCA	At approx. 2310 hrs on the 31st January 5 x protestors arrived at the entrance of the Small Dean Compound. The protestors are believed to be residents of the Wendover Resistance Camp. Police vehicles patrolling the area intervened almost immediately and asked the protestors to move away from the compound and any breach will result in arrests being made. The protestors remained in the area until 0000hrs walking up and down Small Dean Lane claiming they were on public right of way. Police stayed in the area until the protestors dispersed. No interaction with the security officer or any workers working on behalf of HS2 at the compound.							1
INC08882	30/01/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	At approx. 2300 hrs on the 30th January 2021 de vegetation works started at Small Dean Compound. Shortly after a group of around 15-20 individuals who are believed to be residents of the Wendover Active Resistance camp arrived at the front gate to the compound and demanding for the works to be stopped or they would take action. Security manager explained to the protestors that the works have been scheduled and all necessary permissions granted. The protestors then turned violent and attempted to breach the compound, security officers issued warning that they would be endangering their lives and of others and will have no option but to use reasonable force to stop the breach. During the course of attempts to breach 2 x security officers were assaulted. Police arrived shortly after and took charge and a female was arrested on common assault charges. 1 x security officer unharmed, 1 x security officer minor cut on face. At approx. 0205 hrs on 31st January 8 x protestors return to the compound area and attempt to breach compound, security team continued to maintain security of the site and no breach incurred. Police called and immediate attendance and protestors left area heading towards camp. At approx. 0355hrs on 31st January 4 x protestors arrive and make further attempts to breach compound. Security officers maintained the security of the compound and no breaches incurred. Police vehicle arrive shortly after and protestor left the area and headed towards the camp. Security officers remained professional and reasonable force (open palm) was used to avoid any risk to life.	1				1		
INC08879	29/01/2021	Physical / Personal Security	Level 3	[C2] Small Dean Viaduct	NCA	At approx. 1215 hrs 3 x protestors (1 x female, 2 x male) known to be residing in the nearby Wendover Active Resistance camp arrived at the entrance of the Small Dean Compound and were enquiring about what works were taking place. The security officers engaged with them in a polite and professional manner and advised them that they were carrying out ground works. The protestors then turned abusive towards the security officers including a threat made towards the security dog handler. The protestors left the entrance shortly after and headed towards their camp.	1						

18 10 19 27 4 32 1020

Small Dean Update 02/02/21

Reporting Period 02/02/21 00:00 to 23:59hrs




- Social Media calls for assistance from 22:00hrs.
- Social Media Post relating to the Allan Cook Remembrance Camp

Activity

- Activists climbed trees in “Golden Triangle”
An observation point has been established and all vehicle details are noted
- Camp Established at lavender.frail.inkjet
HORACE Ref:INC08907 L2 incident land
Allen Cook Camp
- Slow walk conducted at 14:00, 1 truck took 12 minutes to cover 300m distance
HORACE Ref:INC08916
- Activist launched a projectile at an Area Security and Resilience Manager vehicle at 12:30
HORACE Ref:INC08917
- Additional Security Manning:
 - Nights: 10 SG (DS) + 3 K9
 - Days: 4 SG (DS)



08:00 03/02/21
W3W: lavender.frail.inkjet

-  New Protestor Camp
-  Small Dean Compound
-  Protestors in trees

Small Dean Update 04/02/21

Reporting Period 04/02/21 00:00 to 23:59hrs

- Social Media Post relating to the Allan Cook Camp
- Ongoing Social Media Posting Relating to works

Activity

- Activists remain climbed trees in "Golden Triangle" An observation point has been established and all vehicle details are noted
- Camp Established at lavender.frail.inkjet has been further reinforced
- 10:14hrs – 12:20 Attempted site incursions (see diagram), Police attended site to support security officers.
- 13:20hrs Slow Walking in front of vehicles departing the Small Dean Compound
- Additional Security Manning:
 - Days: 4 x DS trained officers + K9
 - Nights: 4 x DS trained officers + K9



SMALL DEAN ENFORCEMENT OPERATION

North Tower



Main camp south tower ("the temple")



Bath-tub lock-on





Unoccupied tunnels in the main encampment





16.10.2022 – only base of main tower remaining



Tunnel entrance hatch



Tunnel removal team works on drop shaft





Tree that had to be felled for activists' safety



8 November 2021 – D19



ORIG-B-256

9 November 2021 – D19, D20 and D21 removed from tunnels



ORIG-B-257



ORIG-B-258



ORIG-B-259

9 November 2021 – view into one of activists’ drop shafts



10 November 2021 – view into removal team down shaft



11 November 2021 – D18 in tunnel ahead of removal team



ORIG-B-261

12 November 2021 – activists lying head to head in tunnel with noose around their necks (D18's feet in sleeping bag)



13 November 2021 – final lock-on device



ORIG-B-263

13 November 2021 – D18 and D24 after being removed from the tunnels



ORIG-B-264

Pictures from Facebook page W.A.R against hs2
(<https://www.facebook.com/WendoverActiveResistanceCamp>)



D18



ORIG-B-266

D19 and D24



ORIG-B-267

D20



ORIG-B-268

D24

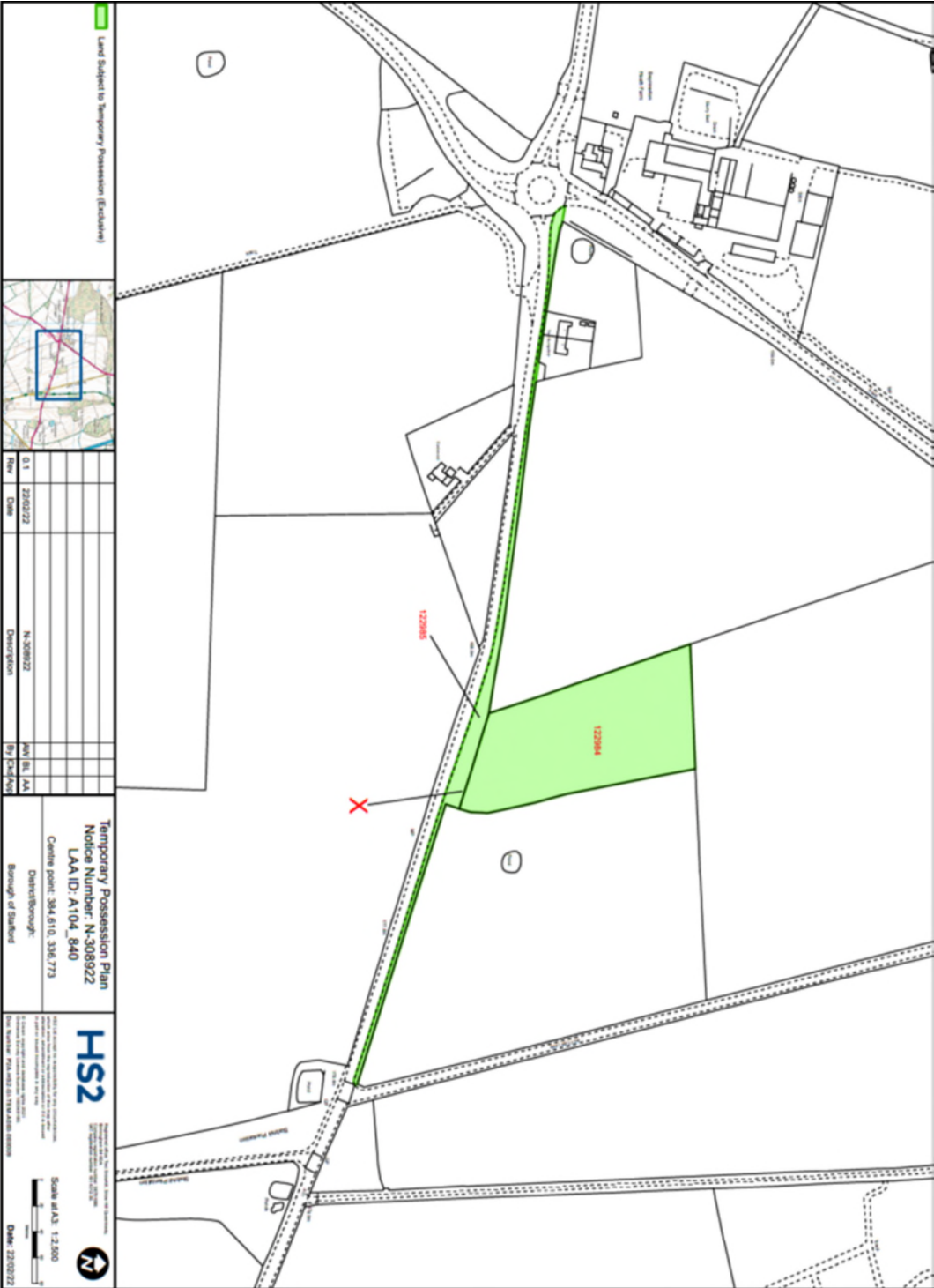


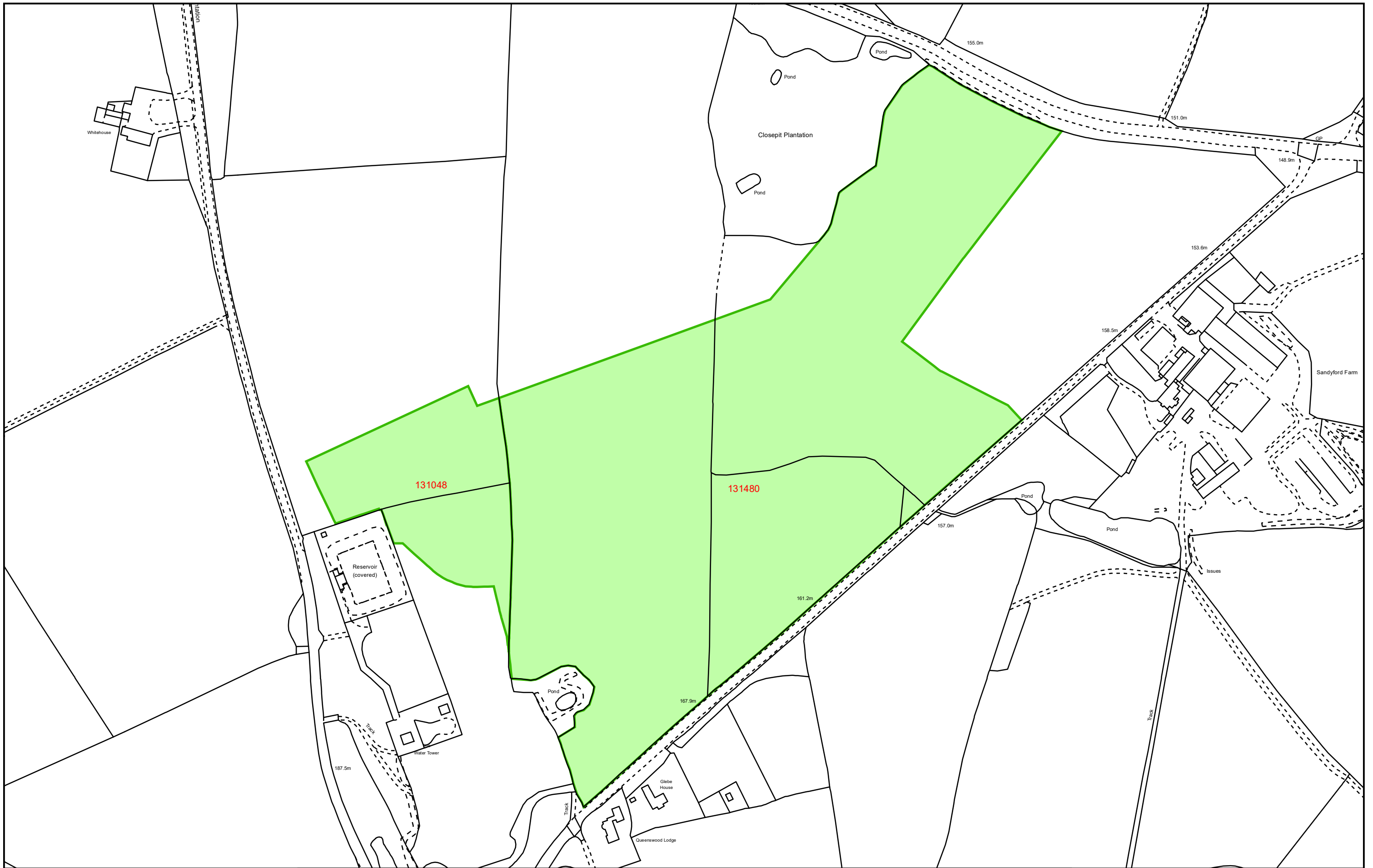
ORIG-B-269

D23

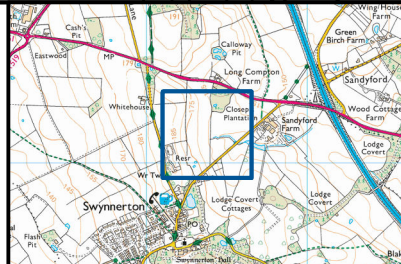


ORIG-B-270





Land Subject to Temporary Possession (Exclusive)



Rev	Date	Description	By	Ckd	App
0.1	01/12/21	N-307156	AW	BL	AA

Temporary Possession Plan
 Notice Number: N-307156
 LAA ID: A104_073

Centre point: 385,377, 336,176

District/Borough:

Borough of Stafford

HS2

Registered office: Two Snowhill, Snow Hill Queensway,
 Birmingham B4 6GA
 Company registration number: 06791686.
 VAT registration number: 181 4312 30.



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

Scale at A3: 1:2,500



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ORIG-B-272

**STILLS FROM VIDEO SHOWING D19 BEING REMOVED FROM HS2
LAND ON 10.03.2021**





Drew Robson was live
March 10 at 10:12 AM

42 21 Comments 252 Views

Like Comment Share

Comments Hide

Most relevant

Hayley Pitwell · 4:10
all that for 3 crusties I skin love it
hahaha
Like Reply

Tim Hall · 2:29
They need more security, what a
joke. cant deal with a few activists.
Like Reply

View 16 more comments

On behalf of: Applicants/Claimants
R.Jordan
1st statement of witness
Exhibits: RJ1 and RJ2
Date:23 March 2022

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

Claim No.

BETWEEN:

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

Claimants

- and -

**(2) 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 PARTICULARS OF CLAIM ("THE
CASH'S PIT LAND")**

AND OTHERS

Defendants

**EXHIBIT RJ2
TO THE WITNESS STATEMENT OF RICHARD JOSEPH JORDAN**

All videos are at: <https://vimeo.com/showcase/exhibit-rj2>

All videos can also be found on the USB stick provided to the Court with the Hearing Bundles.
The videos can be found in folder "Exhibit RJ2".

ORIG-B-275

INDEX TO EXHIBIT RJ2

All videos are at: <https://vimeo.com/showcase/exhibit-rj2>

Video Number	Date	Description	Source URL
Video 1	19.05.2020	BBC – Small Dean	https://www.facebook.com/STOP.HS2/videos/2332590110375892
Video 2	24.03.2021	D32 - Twitter	https://www.twitter.com/bearwitness2019/status/1374751791456391171
Video 3	23.02.2022	D6 Facebook – help us buy a minibus	https://www.facebook.com/661665316/videos/473075977700088
Video 4	24.02.2022	D6 Facebook – notices being served	https://www.facebook.com/661665316/videos/286622000246464
Video 5	10.03.2022	D17 Facebook – Swynnerton update	https://www.facebook.com/100035849292228/videos/3199408426940673
Video 6	24.02.2022	D5 Facebook – over-ground, underground	https://www.facebook.com/ross.monaghan.35/videos/483736580013085
Video 7	16.03.2022	Trespass at Capper’s Lane, Lichfield	https://www.facebook.com/HS2rebellion/videos/672767173847829
Video 8	30.04.2021	JHW fence attack by activists in white coveralls	N/A
Video 9	25.02.2021	Poor’s Piece eviction	https://www.facebook.com/simone.h.lister/videos/10158208020547972
Video 10	05.03.2021	Security patrol at Leather Lane	N/A
Video 11	30.12.2021	D6 M42 Lorry surf	https://www.facebook.com/102443345283393/videos/250211620550722
Video 12	05.09.2020	Euston crane climb	https://www.facebook.com/watch/?v=1419889114873599
Video 13	20.11.2020	Vehicle climb Edgcott Rd, Quainton	https://www.facebook.com/HS2rebellion/videos/397455331667046
Video 14	30.10.2020	Gawcott Road, Calvert “Red Rebel” access obstruction	https://www.facebook.com/watch/live/?ref=search&v=2745028369099011

Video Number	Date	Description	Source URL
Video 15	06.05.2021	D32 and D60 spraying The Podium with pink paint	https://www.facebook.com/HS2rebellion/videos/366715554773859/
Video 16	06.05.2021	D32 trespassing on The Podium	https://www.youtube.com/watch?v=mztZ2CKtWRg
Video 17	11.02.2021	D26 tethered in Euston Square Gardens tunnels	N/A
Video 18	24.02.2021	D24 and D30 chained to acrow prop in Euston tunnels	N/A
Video 19	January 2021	Euston Square Gardens tree eviction	https://metro.co.uk/video/hs2-protesters-evicted-euston-square-gardens-2342418/?ito=vjs-link
Video 20	12.05.2021	D17 digger climb at Jones Hill Wood	https://www.facebook.com/100035849292228/videos/483138009557838
Video 21	08.08.2020	Harvil Rd digger climb	https://www.facebook.com/100035849292228/videos/305151457356495
Video 22	10.10.2021	Small Dean Tower and “Trippy hell room”	https://www.facebook.com/WendoverActiveResistanceCamp/videos/915519819067262
Video 23	18.02.2021	Small Dean – abuse of female security guard	N/A – security footage
Video 24	18.02.2021	Small Dean – abuse of male security guard	N/A – security footage
Video 25	26.03.2021	Small Dean assault on security	N/A – security footage
Video 26	03.10.2020	Activist grappling with enforcement officer on cherry picker	https://www.facebook.com/FengHoEthicalFashion/videos/10158334810835932
Video 27	01.10.2020	Opening section of a Vice Mini Documentary	https://www.youtube.com/watch?v=s6MAxf9yv14

Video Number	Date	Description	Source URL
		covering Jones Hill Wood eviction	
Video 28	05.03.2021	Trespass and attempts to prevent fencing at Jones Hill Wood	https://www.facebook.com/ken.lumsden.75/videos/782150446041981
Video 29	07.04.2021	Lock-on obstructing access to Jones Hill Wood	https://www.facebook.com/val.saunders.35/videos/10225537561695409
Video 30	26.01.2021	BBC inside tunnels under Euston Square Gardens	https://www.bbc.co.uk/news/uk-england-london-55796445
Video 31	30.01.2021	ESG XR First few days	https://www.youtube.com/watch?v=29THGe0V8PE
Video 32	19.02.2021	21:02hrs – D30 pushing spoil with feet	N/A security footage
Video 33	14.02.2021	ESG PS Hirst speaking to D32 - at 17.02hrs	N/A security footage
Video 34	14.02.2021	ESG PS Hirst speaking to D32 - at 17.15hrs	N/A security footage
Video 35	16.02.2021	ESG D32 interfering with works	N/A security footage
Video 36	18.02.2021	ESG D26 guided tour of tunnels part 1	https://www.youtube.com/watch?v=MLCMX7WLcyI
Video 37	19.02.2021	ESG D26 guided tour of tunnels part 2	https://www.youtube.com/watch?v=ermx7wBy8Co
Video 38	19.02.2021	ESG video taken by D32 at 11:49	N/A
Video 39	19.02.2021	ESG second video taken by D32	N/A

Video Number	Date	Description	Source URL
Video 40	16.02.2021	Small Dean D24 – activists about to retreat underground	https://www.facebook.com/WendoverActiveResistanceCamp/videos/972864376776586
Video 41	16.10.2021	Small Dean D24 – activists retreat to the tunnel	https://www.facebook.com/WendoverActiveResistanceCamp/videos/945507006034883
Video 42	25.10.2021	Small Dean video taken by removal team in tunnels	N/A
Video 43	20.10.2021	Small Dean D19 and D21 in tunnels	https://www.facebook.com/WendoverActiveResistanceCamp/videos/3052604451733497
Video 44	October 2021	Small Dean 3D map of tunnels	N/A
Video 45	09.03.2022	Swynnerton obstruction of access to HS2 Land where Cadent gas works taking place	https://www.facebook.com/100035849292228/videos/1423046118110584
Video 46	10.03.2022	Swynnerton trespass and attempted digger climb	https://www.facebook.com/100035849292228/videos/3199408426940673
Video 47	14.03.2022	Swynnerton – mass trespass filmed by D17	https://www.facebook.com/100035849292228/videos/708622600135509

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 Original Application Documents Bundle (March 2022) (Volume D)

ORIG-B-280

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 Original Application Documents Bundle (March 2022) (Volume C)

ORIG-B-281

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**

ORIG-B-282

HS2 slaps eviction notice on activists in this makeshift Staffordshire camp




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

SHARE   

19 COMMENTS

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

NEWS

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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**

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/>

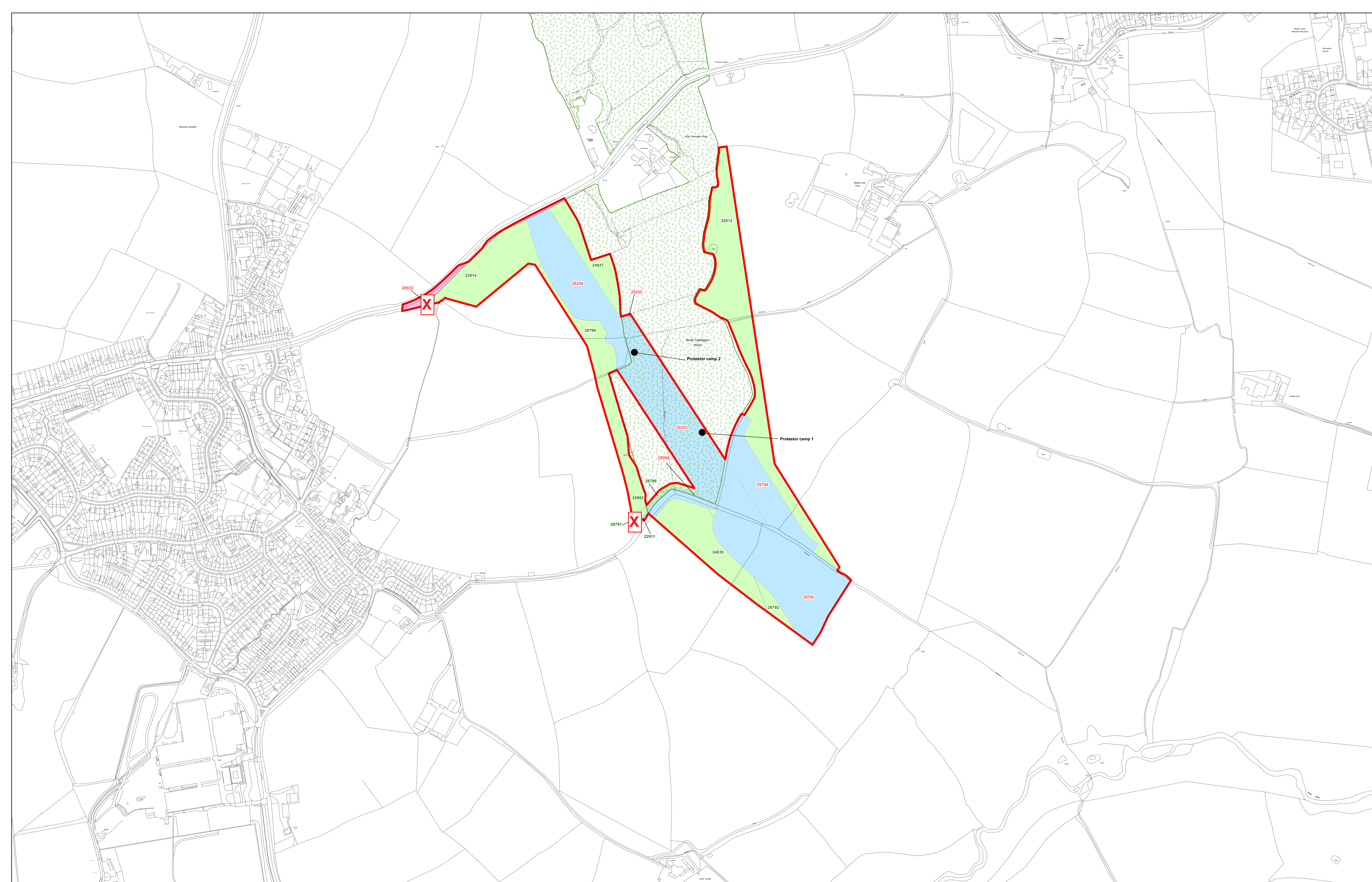
³ <https://www.gov.uk/government/publications/form-n210-acknowledgment-of-service-cpr-part-8>

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/>

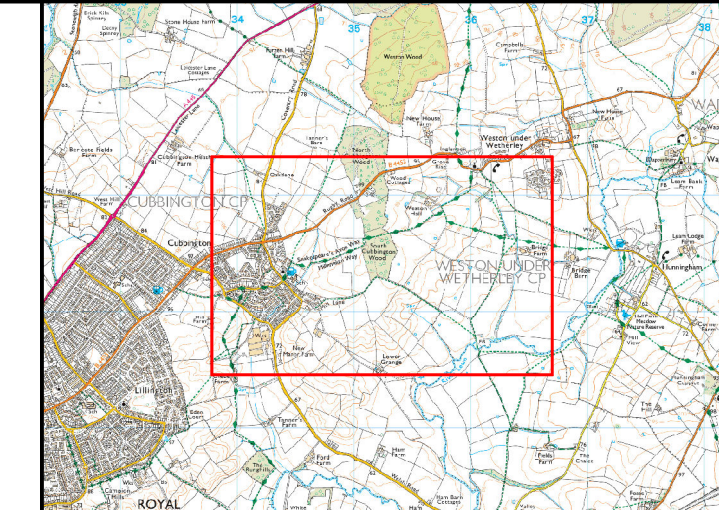
Civil Procedure Rules Part 8: <https://www.justice.gov.uk/courts/procedure-rules/civil/rules/part08>

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



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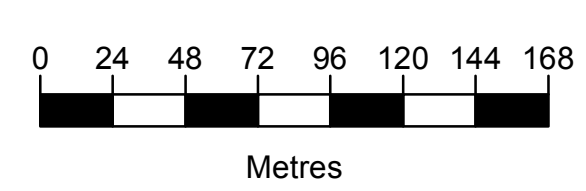
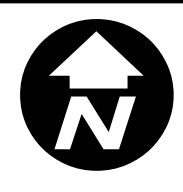
- Protector Camps
- Land Required
- Vested GVD
- Schedule 16 notice served and possessed
- Vested GVD registered to Secretary of State on HMLR register
- Ancient woodland



Plan A

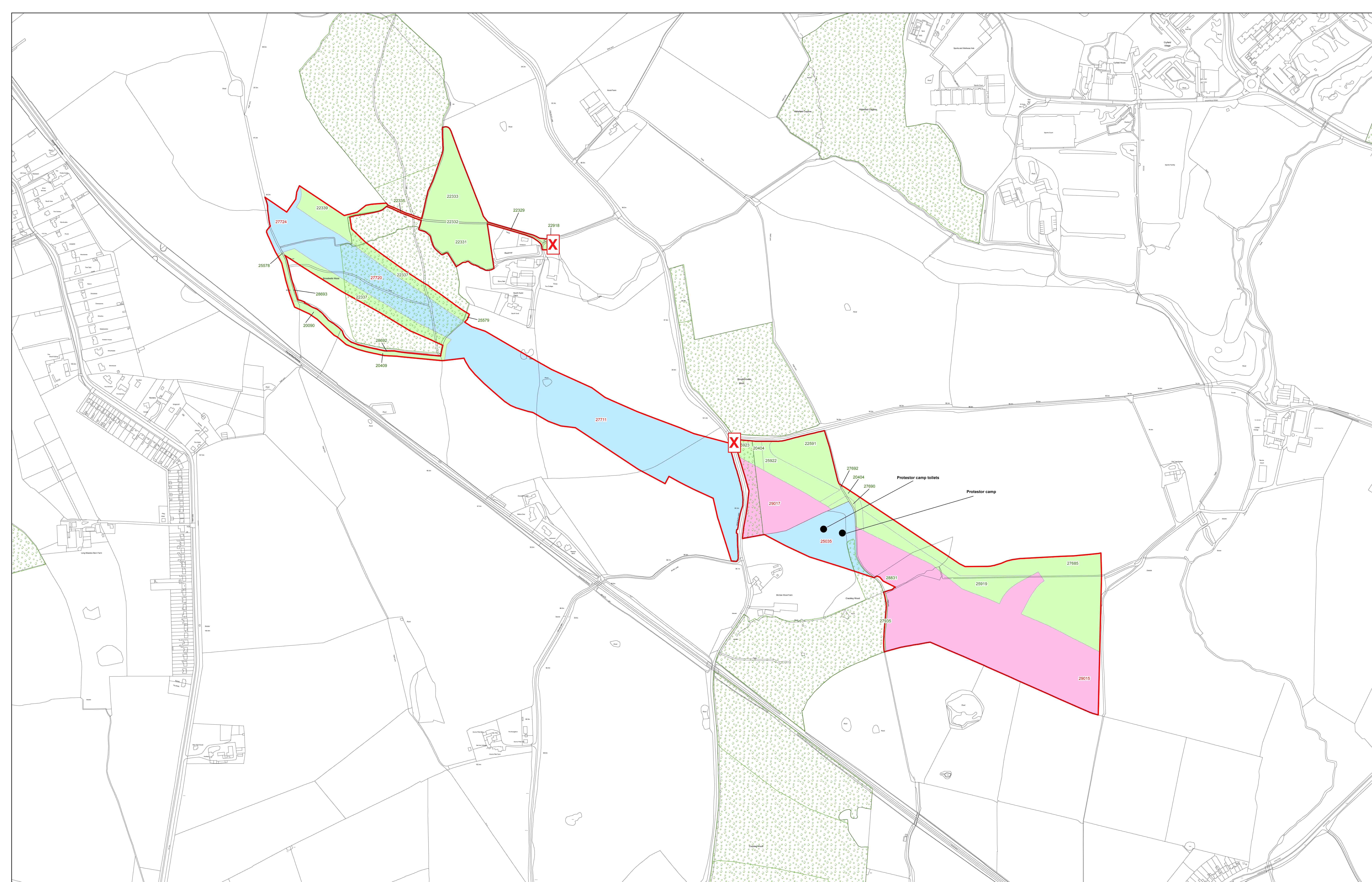


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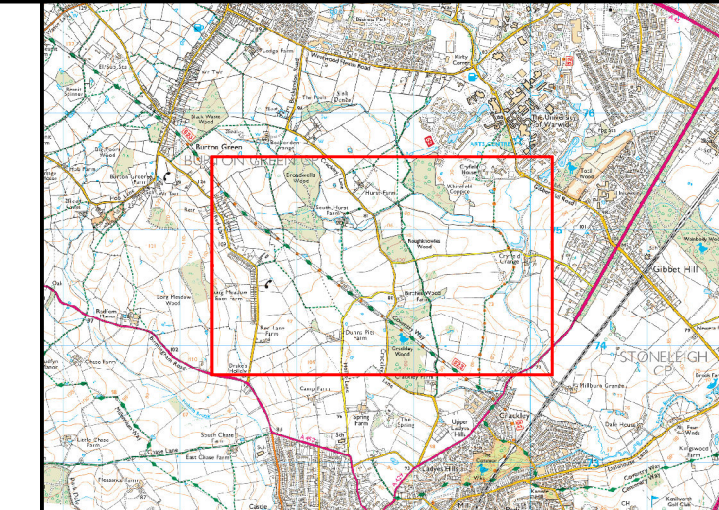
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Date: 12/02/2020
 ORIG-B-309

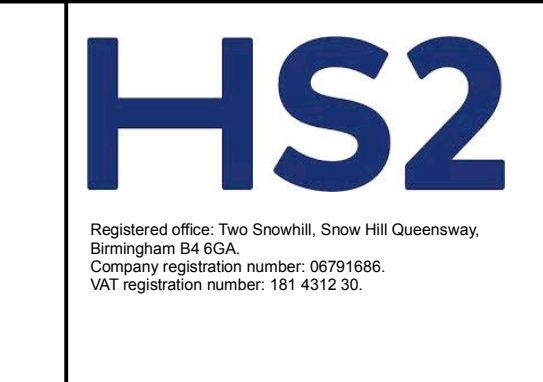


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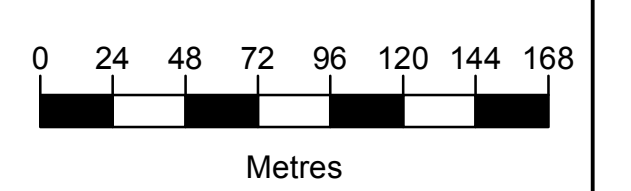
- Protestor Camps
- Land Required
- Vested GVD
- Schedule 16 notice served and possessed
- Vested GVD registered to Secretary of State on HMLR register
- Ancient woodland

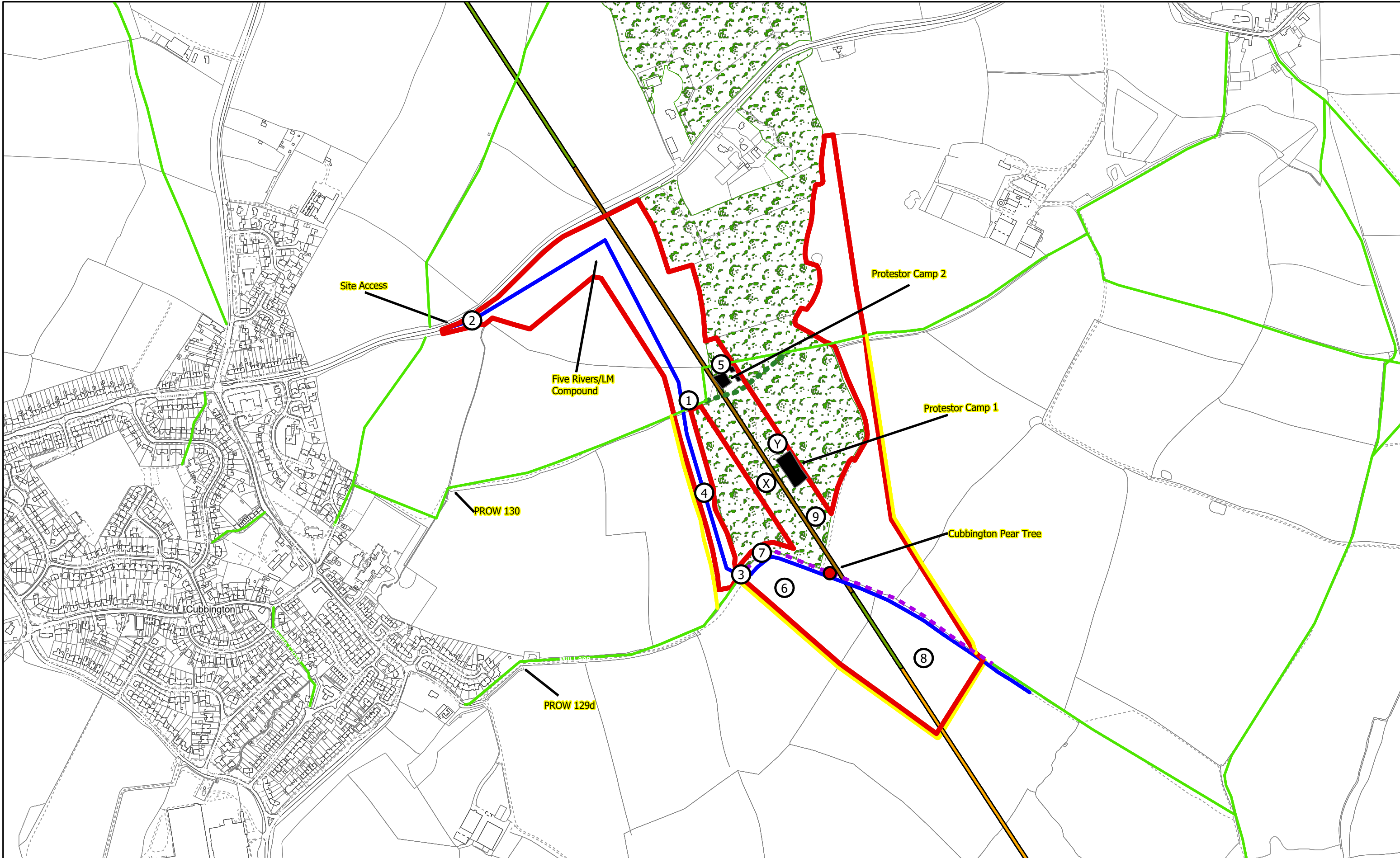


Plan B



Scale at A0: 1:2,500





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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

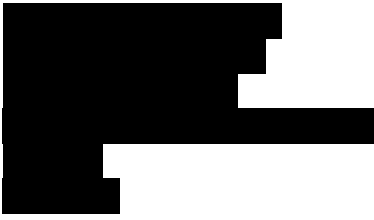
Working on behalf of **HS2**

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

0 55 110 220
Metres

ORIG-B-311 27/02/20

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 black 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.

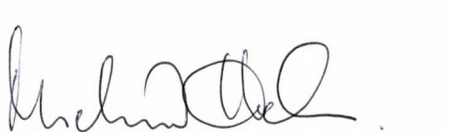
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes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

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.

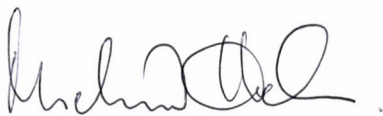
Please provide any information that you may have in relation to the following issues:

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

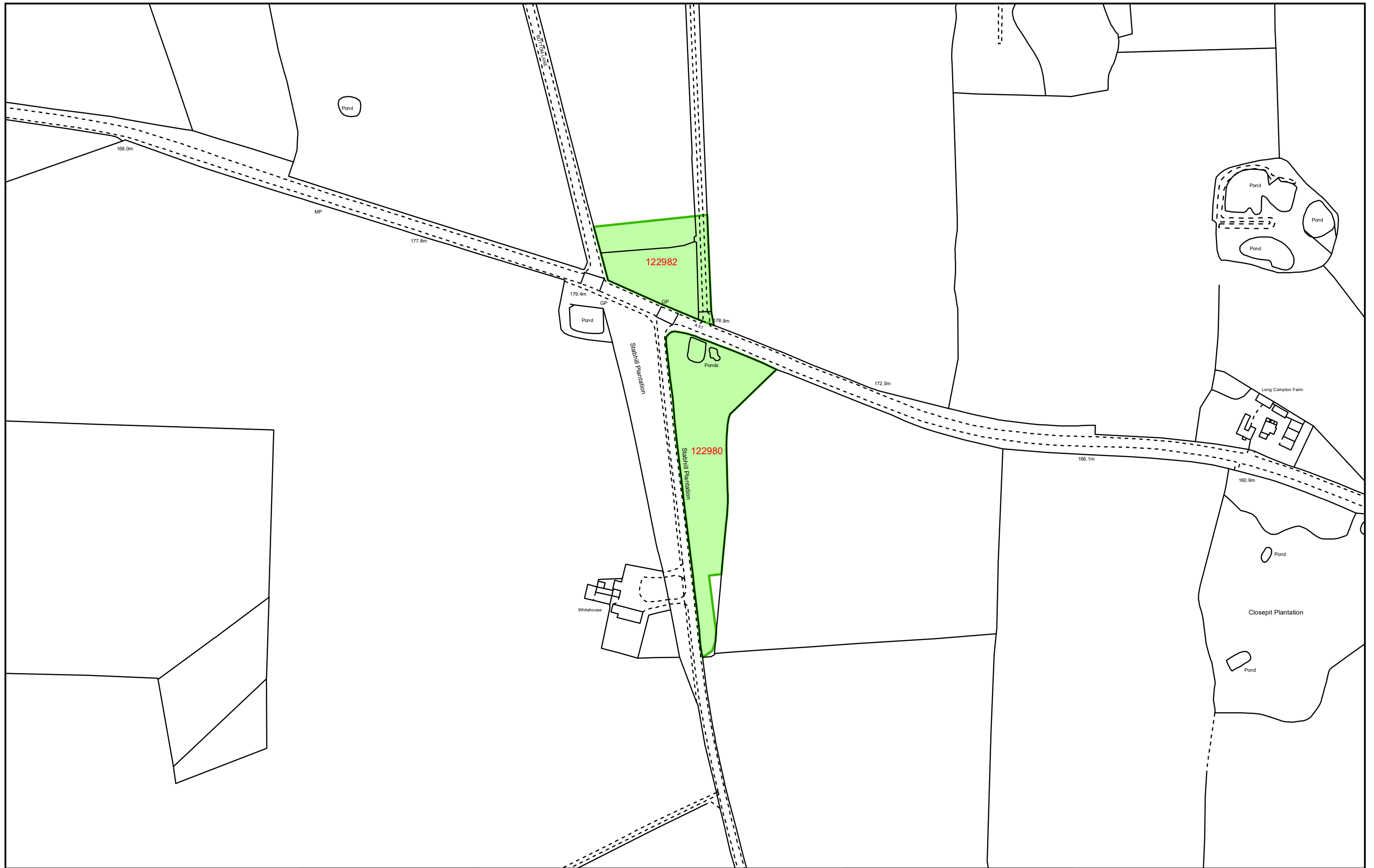
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021


Notice No. N-308914

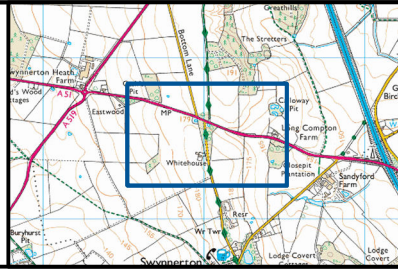
SCHEDULE

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)



 Land Subject to Temporary Possession (Exclusive)



Rev	Date	Description	By	Ckd	App
0.1	18/02/22	N-308914	AW	BL	AA

Temporary Possession Plan
 Notice Number: N-308914
 LAA ID: A104_840
 Centre point: 385,021, 336,523

District/Borough:
 Borough of Stafford

HS2

Registered office: Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA
 Company registration number: 06791686.
 VAT registration number: 181 4312 30.

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

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

Scale at A3: 1:2,500




ORIG-B-320



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.


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

The Chief Executive
Staffordshire County Council



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Reference Land: as per the enclosed notice schedule and plan

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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.

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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		
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, e.g. <i>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"/>
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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"/>
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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 Chief Executive
Staffordshire County Council

Notice No. N-308915

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Dated: 24 February 2022

High Speed Two (HS2) Limited

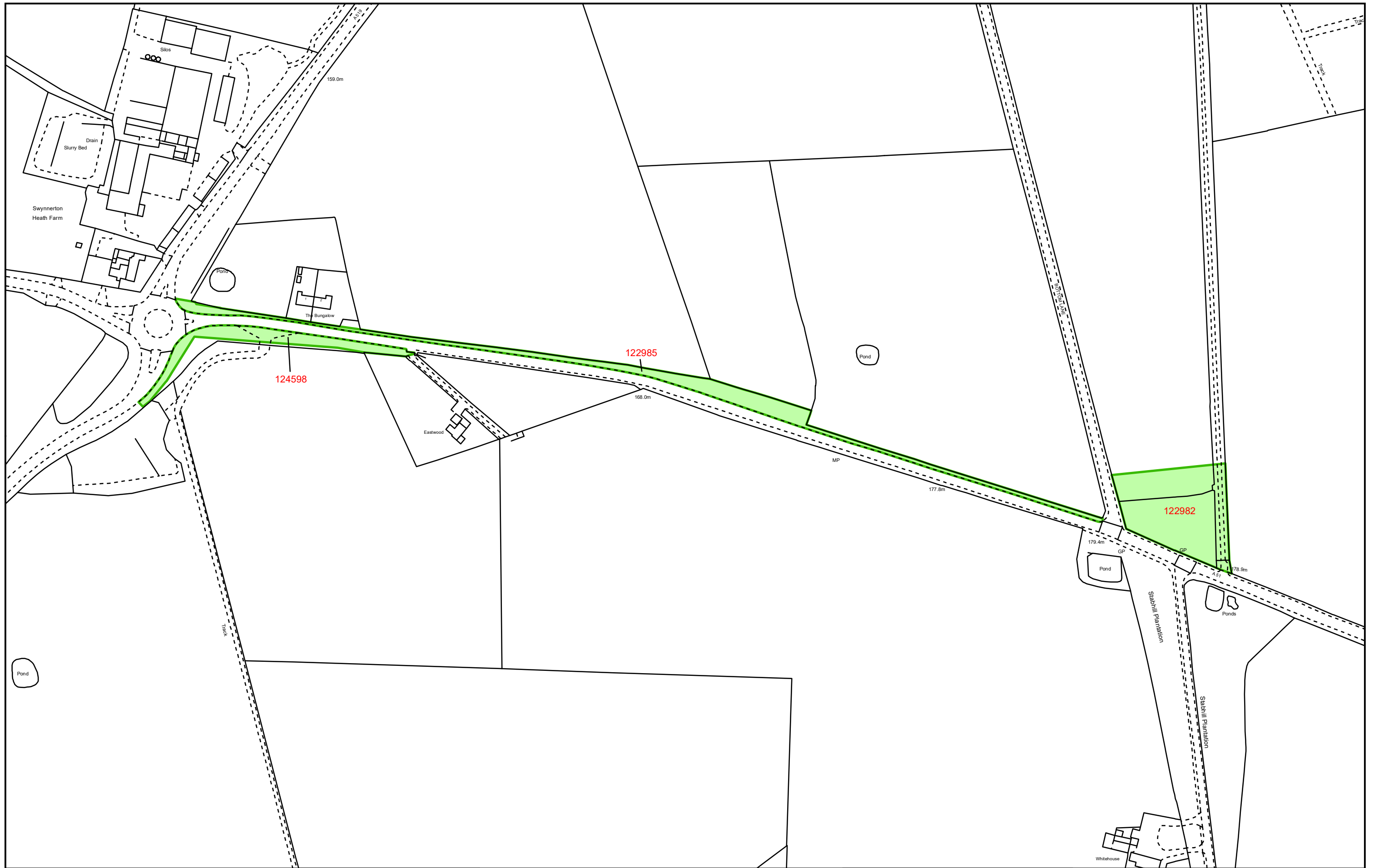
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021


Notice No. N-308915

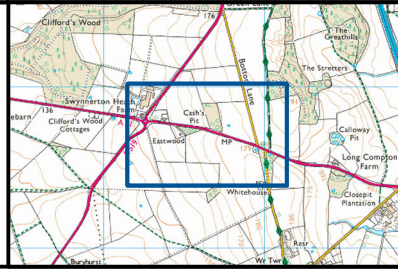
SCHEDULE

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)



 Land Subject to Temporary Possession (Exclusive)



Rev	Date	Description	By	Ckd	App
0.1	18/02/22	N-308915	AW	BL	AA

Temporary Possession Plan
 Notice Number: N-308915
 LAA ID: A104_840
 Centre point: 384,644, 336,704
 District/Borough:
 Borough of Stafford

Registered office: Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA
 Company registration number: 06791686
 VAT registration number: 181 4312 30.

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

Scale at A3: 1:2,500



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

ORIG-B-328



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?

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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.

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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What happens now?

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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 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

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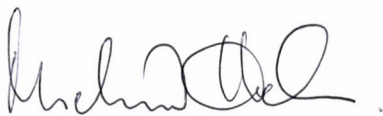
Please provide any information that you may have in relation to the following issues:

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, e.g. <i>electrical sub-stations, lifts or fixed air conditioning systems</i> ?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
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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
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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.

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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

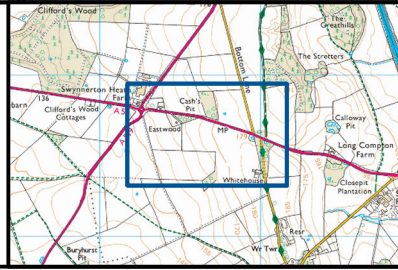
SCHEDULE

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)



Land Subject to Temporary Possession (Exclusive)



Rev	Date	Description	By	Ckd	App
0.1	18/02/22	N-308917	AW	BL	AA

Temporary Possession Plan
 Notice Number: N-308917
 LAA ID: A104_840
 Centre point: 384,668, 336,631
 District/Borough:
 Borough of Stafford

HS2

Registered office: Two Snowhill, Snow Hill Queensway,
 Birmingham B4 6GA
 Company registration number: 06791686.
 VAT registration number: 181 4312 30.

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

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

Scale at A3: 1:2,500

ORIG-B-336



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.

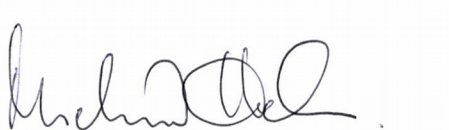
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes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

[REDACTED]

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

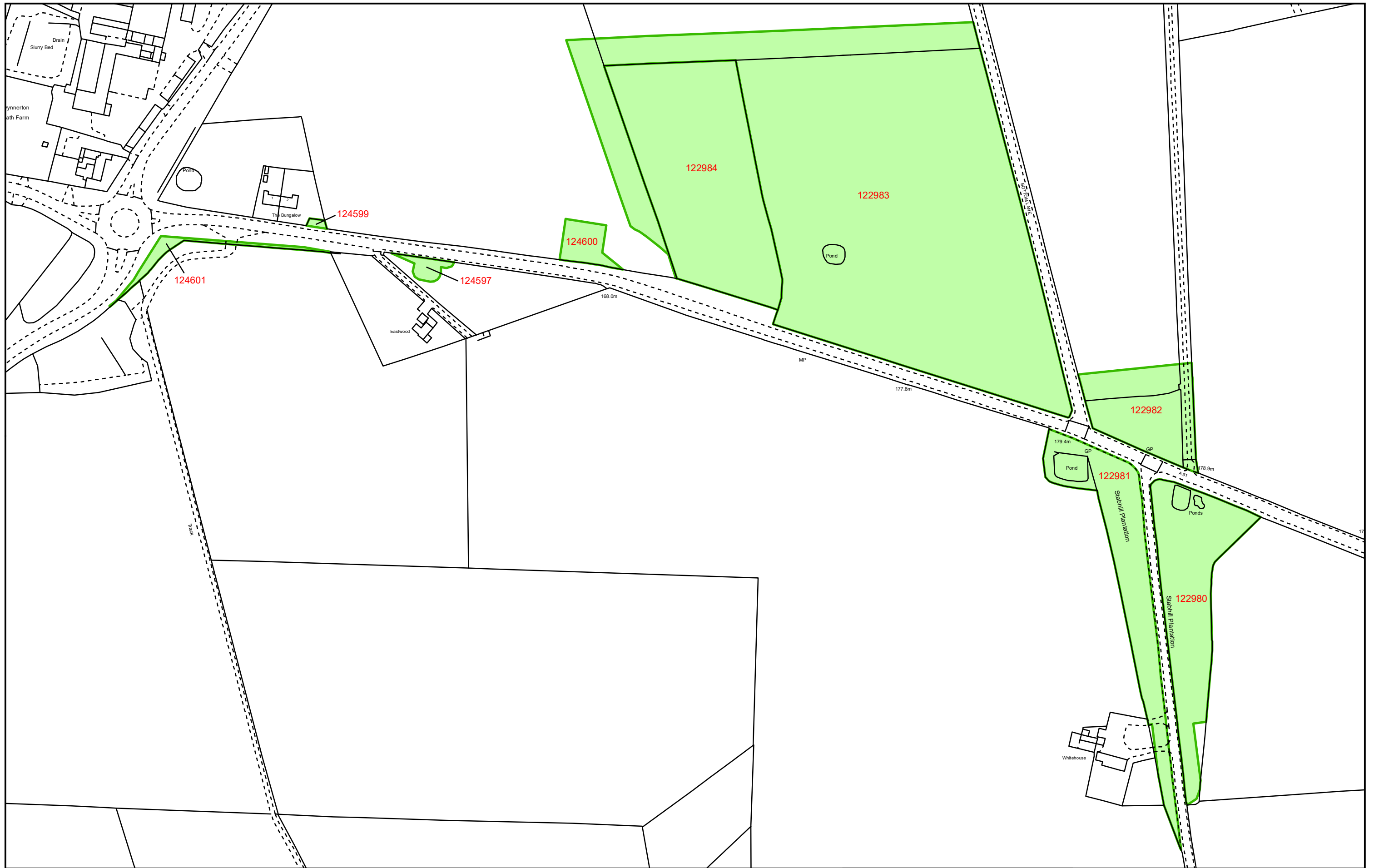
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

Notice No. N-308916

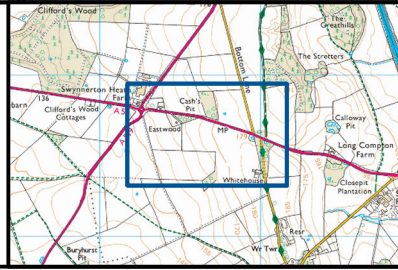
SCHEDULE

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)



Land Subject to Temporary Possession (Exclusive)



Rev	Date	Description	By	Ckd	App
0.1	18/02/22	N-308916	AW	BL	AA

Temporary Possession Plan
 Notice Number: N-308916
 LAA ID: A104_840
 Centre point: 384,668, 336,631
 District/Borough:
 Borough of Stafford

HS2

Registered office: Two Snowhill, Snow Hill Queensway,
 Birmingham B4 6GA
 Company registration number: 06791686.
 VAT registration number: 181 4312 30.

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

Scale at A3: 1:2,500

ORIG-B-344



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?

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.

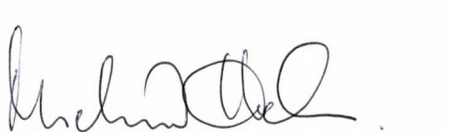
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What happens now?

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

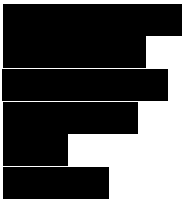
Yours sincerely,



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-A000-308918

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.

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-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, e.g. <i>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:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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.

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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

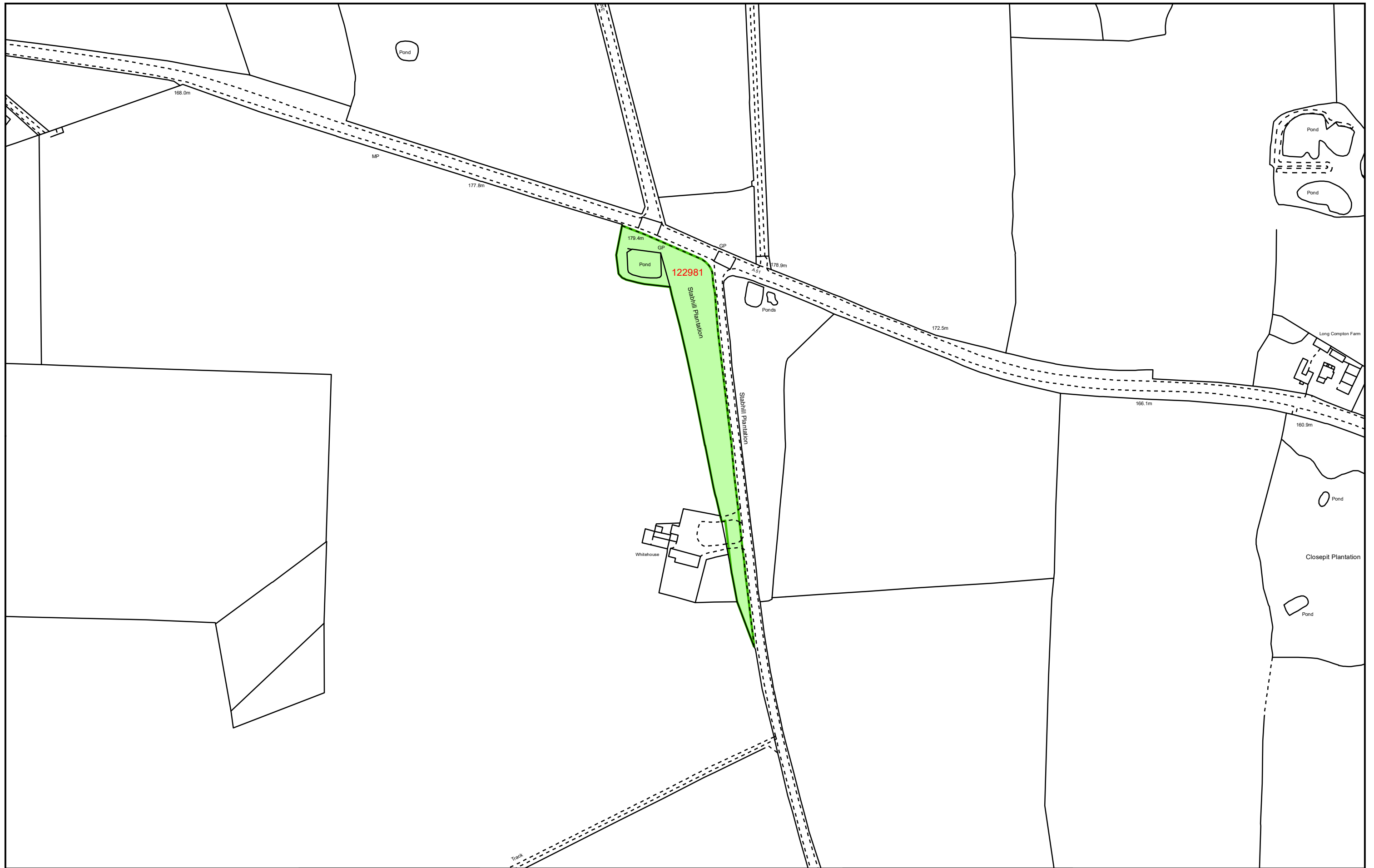
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021


Notice No. N-308918

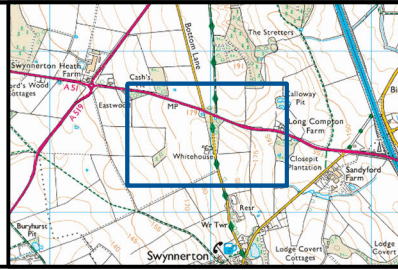
SCHEDULE

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)



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

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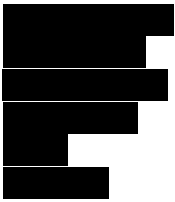
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 Doc Number: P2A-HS2-GI-TEM-A000-000009

Scale at A3: 1:2,500





ORIG-B-352



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.

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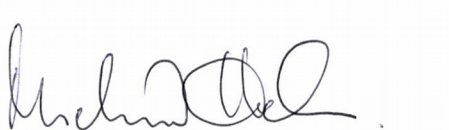
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Dated: 24 February 2022

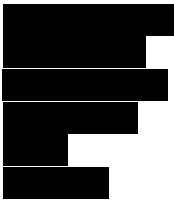
Yours sincerely,



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-A000-308919

Dear 

Confirmation of Health and Safety matters on your land or property

Reference Land: as per the enclosed notice schedule and plan

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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, e.g. <i>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:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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

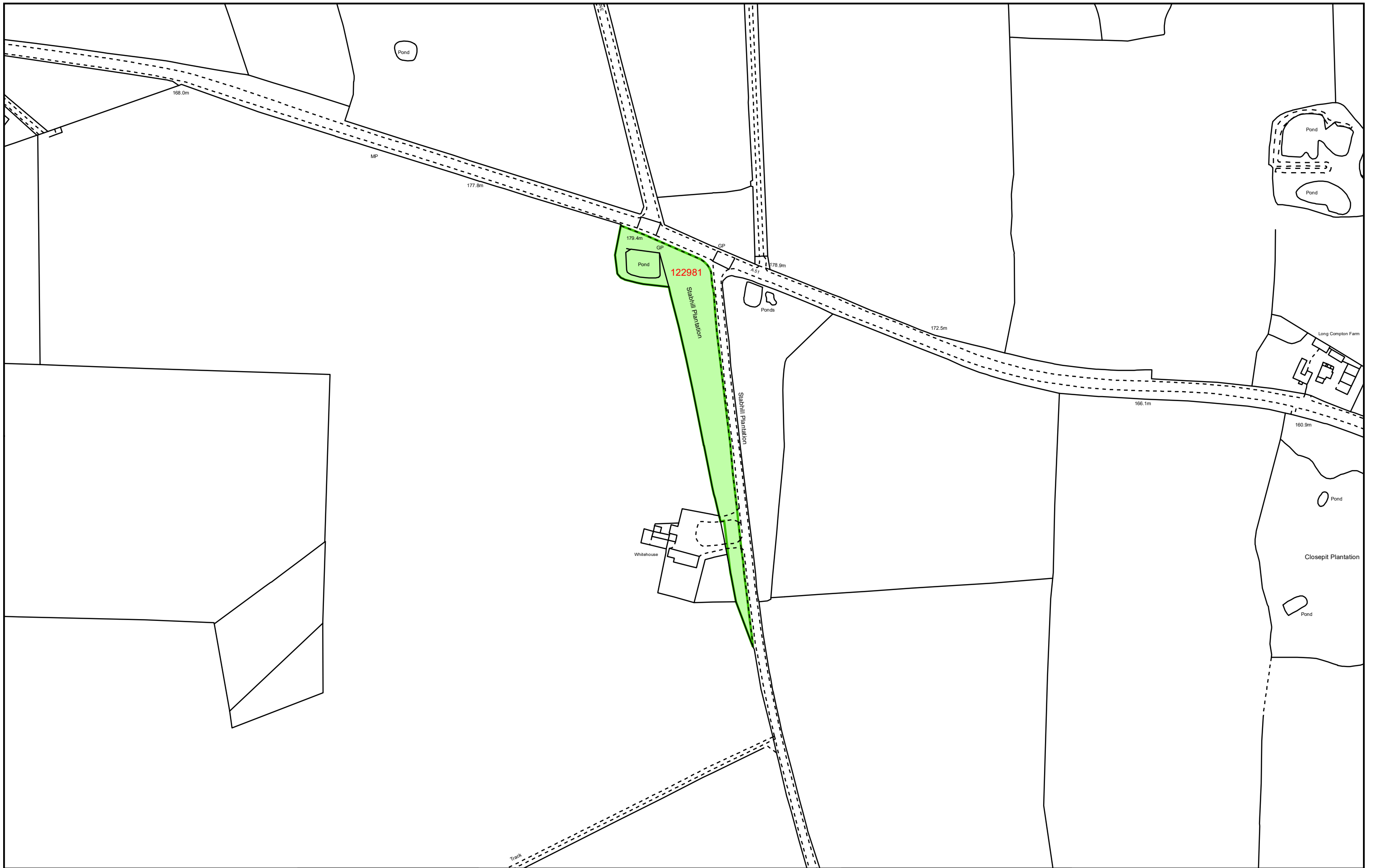
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021

Notice No. N-308919

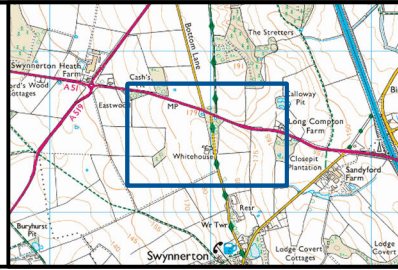
SCHEDULE

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)



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

Temporary Possession Plan
 Notice Number: N-308919
 LAA ID: A104_840
 Centre point: 384,979, 336,483
 District/Borough:
 Borough of Stafford

Registered office: Two Snowhill, Snow Hill Queensway,
 Birmingham B4 6GA
 Company registration number: 06791686.
 VAT registration number: 181 4312 30.

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

Scale at A3: 1:2,500

ORIG-B-360



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.

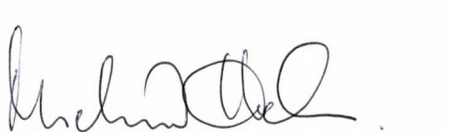
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes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

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, e.g. <i>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

[REDACTED]

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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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

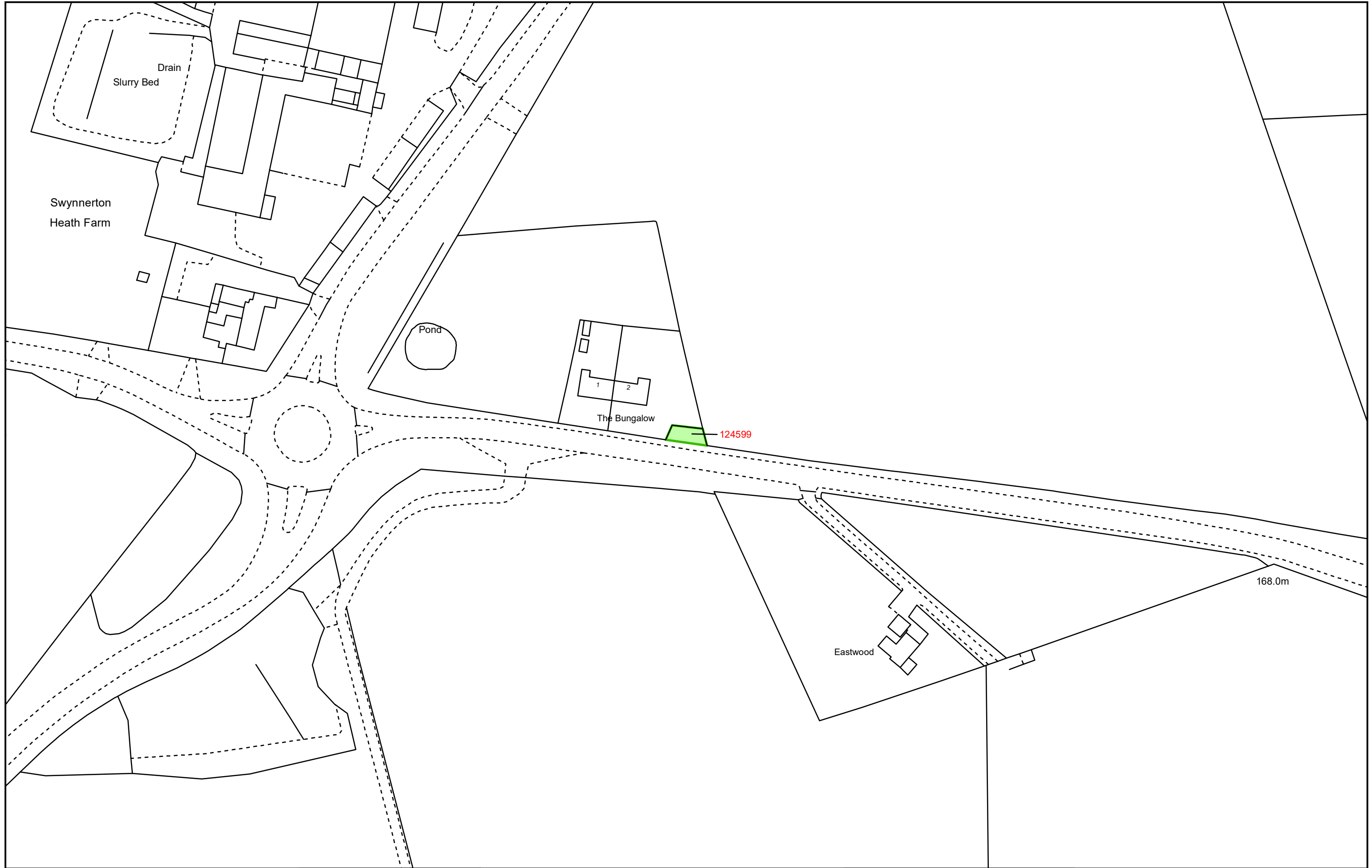
HIGH SPEED RAIL (WEST MIDLANDS - CREWE) ACT 2021


Notice No. N-308920

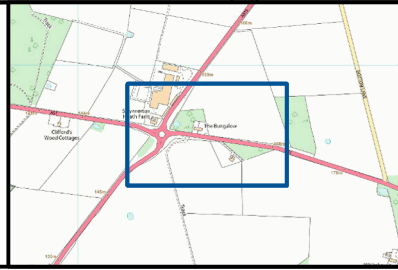
SCHEDULE

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)



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

Temporary Possession Plan
 Notice Number: N-308920
 LAA ID: A104_840
 Centre point: 384,400, 336,786
 District/Borough:
 Borough of Stafford

HS2

Registered office: Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA
 Company registration number: 06791686
 VAT registration number: 181 4312 30

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Scale at A3: 1:1,250


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ORIG-B-368

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	[REDACTED]	24/02/2022	First Class Signed For
N-308915	24/02/2022	2LR01-MMD-LP-LPN-A000-308915	P40024	Staffordshire County Council	[REDACTED]	24/02/2022	First Class Signed For
N-308916	24/02/2022	2LR01-MMD-LP-LPN-A000-308916	P103983	[REDACTED]	[REDACTED]	24/02/2022	First Class Signed For
N-308917	24/02/2022	2LR01-MMD-LP-LPN-A000-308917	P103978	Orbel Agriculture Limited	[REDACTED]	24/02/2022	First Class Signed For
N-308918	24/02/2022	2LR01-MMD-LP-LPN-A000-308918	P104000	[REDACTED]	[REDACTED]	24/02/2022	First Class Signed For
N-308919	24/02/2022	2LR01-MMD-LP-LPN-A000-308919	P104001	[REDACTED]	[REDACTED]	24/02/2022	First Class Signed For
N-308920	24/02/2022	2LR01-MMD-LP-LPN-A000-308920	P104005	[REDACTED]	[REDACTED]	24/02/2022	First Class Signed For
N-308921	24/02/2022	2LR01-MMD-LP-LPN-A000-308921	P124161	[REDACTED]	[REDACTED]	24/02/2022	First Class Signed For

Sent on 24/02/2022

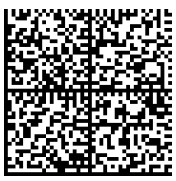
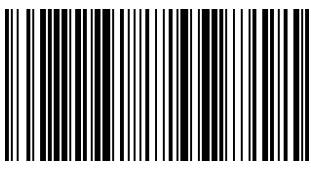
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Delivered By

 Postage on Account GB

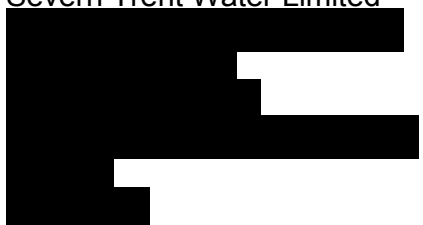
Tracked 24
 LBT Signature

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

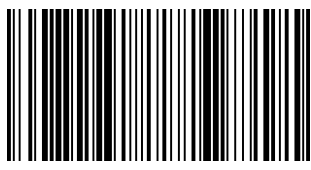
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Tracked 24
 LBT Signature

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

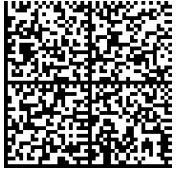

HS2


Delivered By

 Postage on Account GB

Tracked 24
 LBT Signature

L52 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

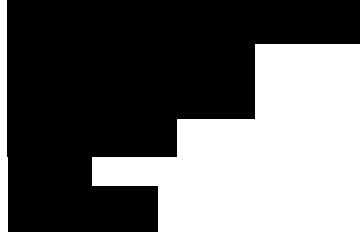
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 Postage on Account GB

Tracked 24
 LBT Signature

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

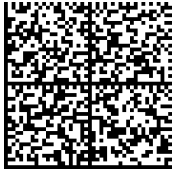
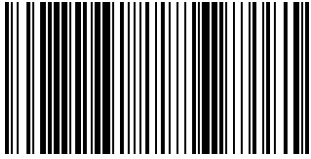
HS2

Delivered By
Tracked 24
 LBT Signature

Royal Mail
 Postage on Account GB

L52 E11	Parcel
	300g

32-049 138 4000-36C BB3 BBF

QU 0080 3063 5GB

[Redacted]

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

Customer Ref:
 38751 / N-308918

HS2

Delivered By
Tracked 24
 LBT Signature

Royal Mail
 Postage on Account GB

L52 E11	Parcel
	300g

32-049 138 4000-36C BB3 BE8




QU 0080 3064 9GB

[Redacted]

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

Customer Ref:
 38752 / N-308919

HS2

Delivered By
Tracked 24
 LBT Signature

Royal Mail
 Postage on Account GB

L52 E11	Parcel
	300g

32-049 138 4000-36C BB3 C13




QU 0080 3065 2GB

[Redacted]

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

Customer Ref:
 38753 / N-308920

HS2

Delivered By
Tracked 24
 LBT Signature

Royal Mail
 Postage on Account GB

L52 E11	Parcel
	300g

32-049 138 4000-36C BB3 C3F




QU 0080 3066 6GB

[Redacted]

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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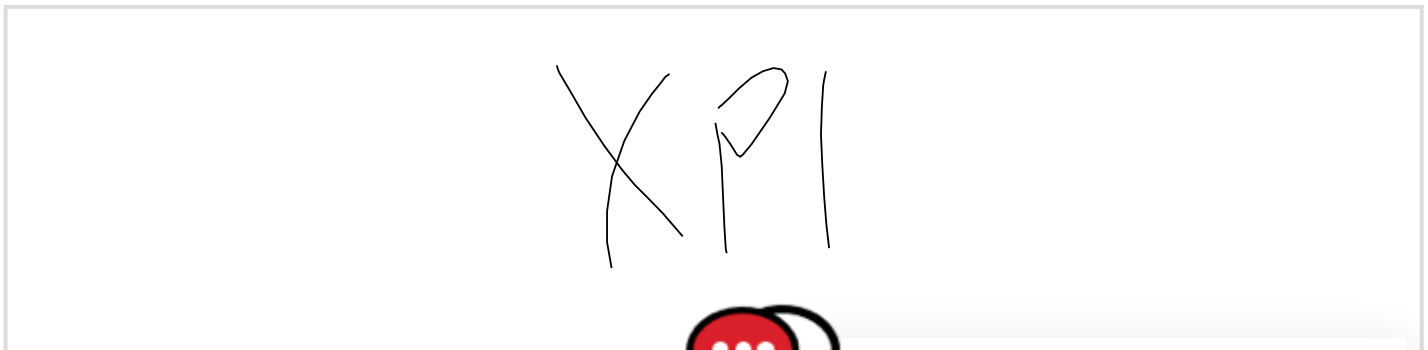
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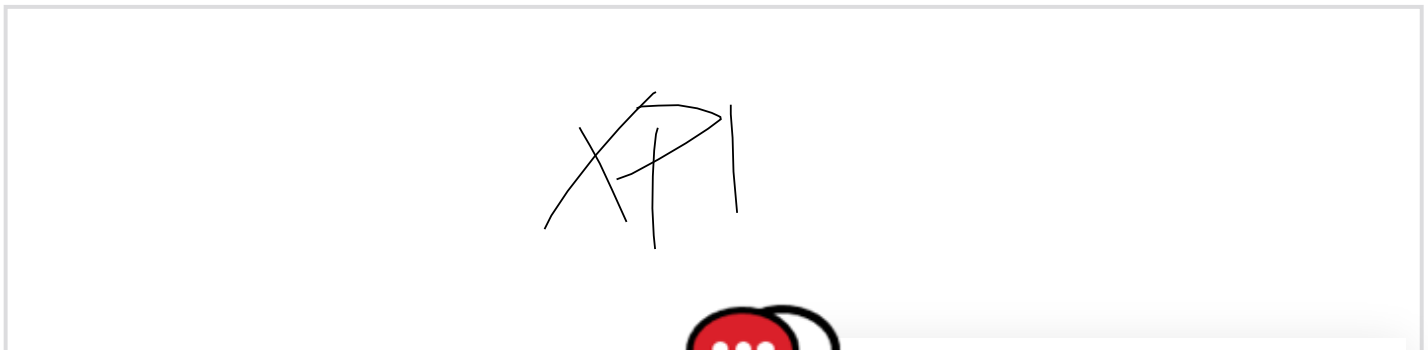
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Service used:

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Tracking Assistant



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

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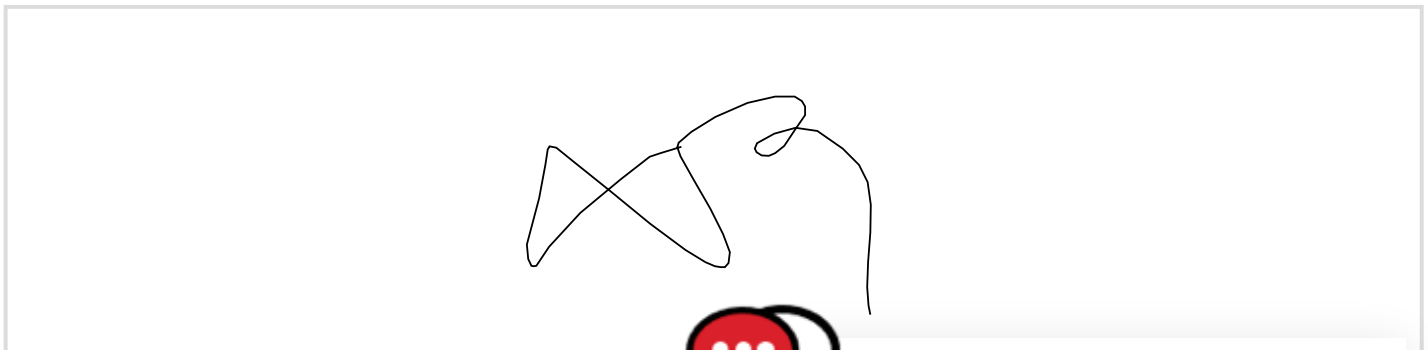
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Service used:

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Your item was delivered on 25-02-2022.

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

Tracking number:

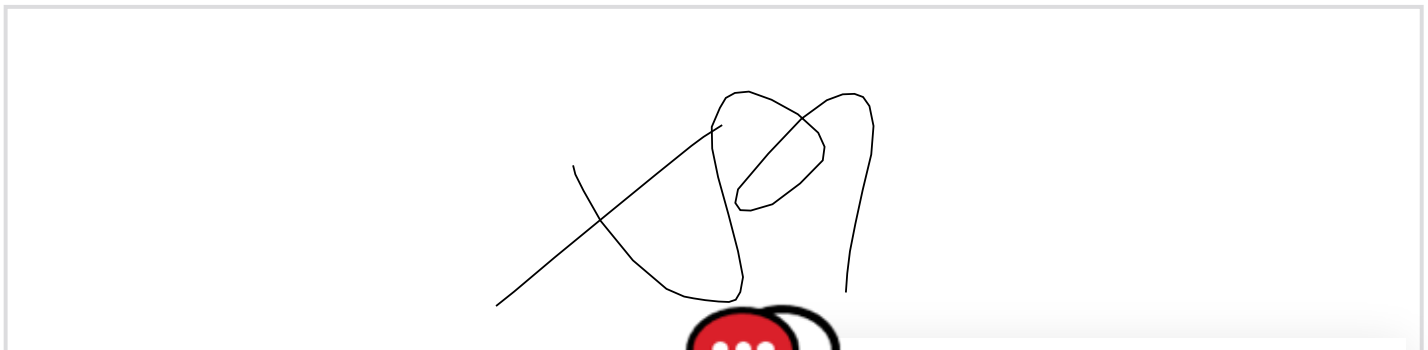
QU008030635GB

Service used:

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Delivered

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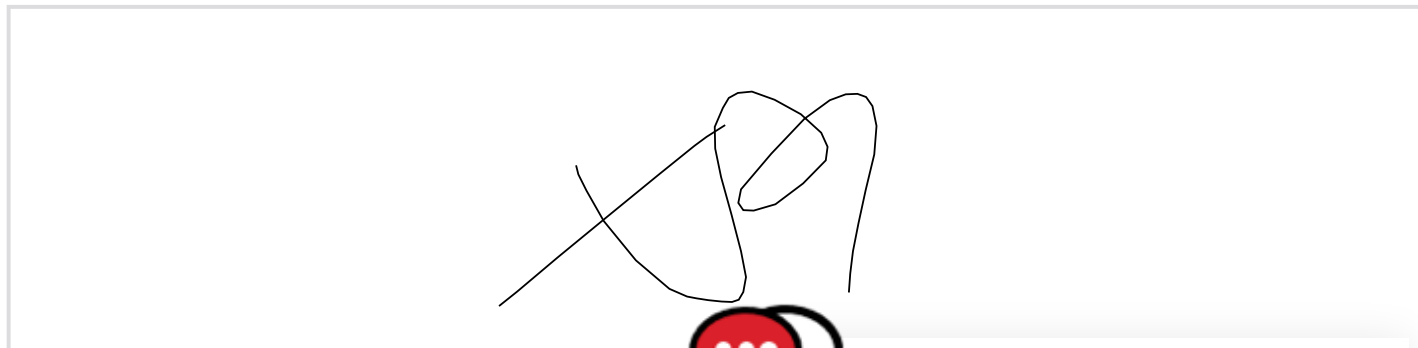
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Service used:

Royal Mail Tracked 24™



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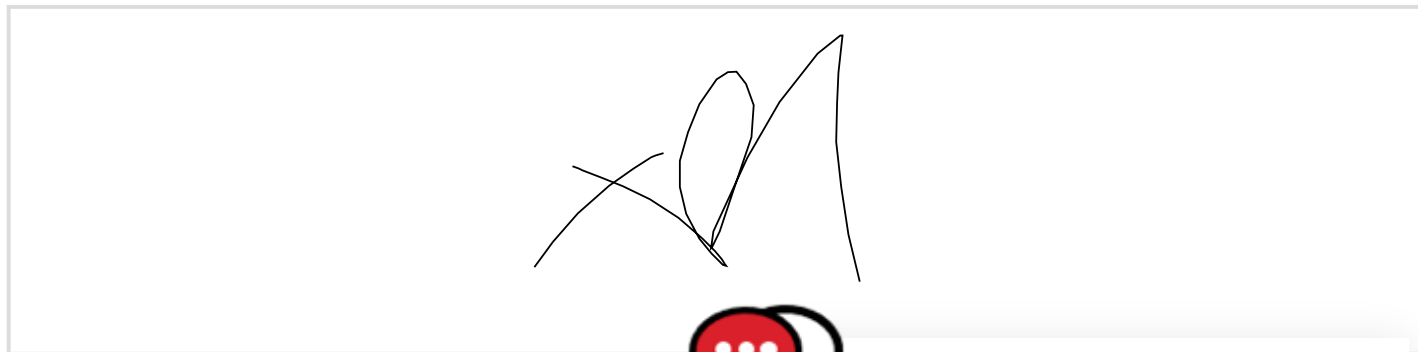
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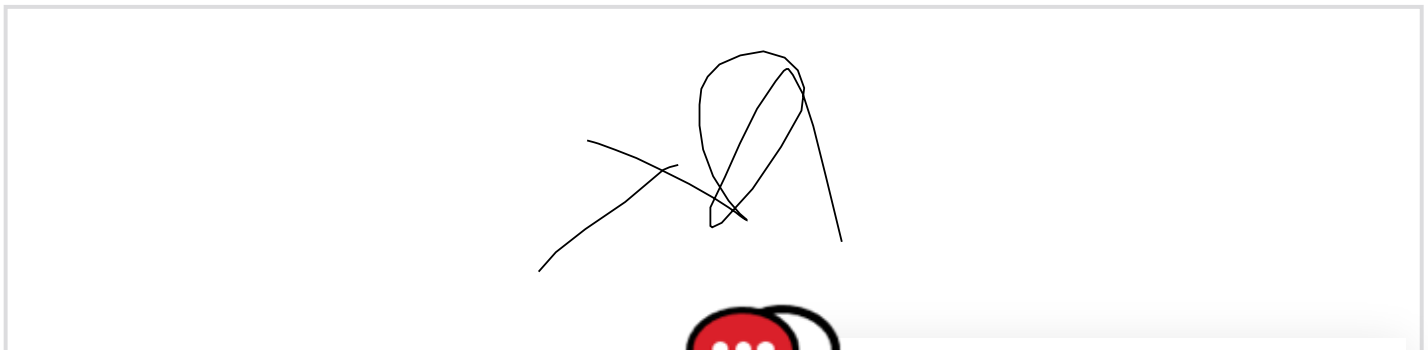
QU008030666GB

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.

ORIG-B-380

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 **Claim No.**
CHANCERY DIVISION

BETWEEN:

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

Claimants

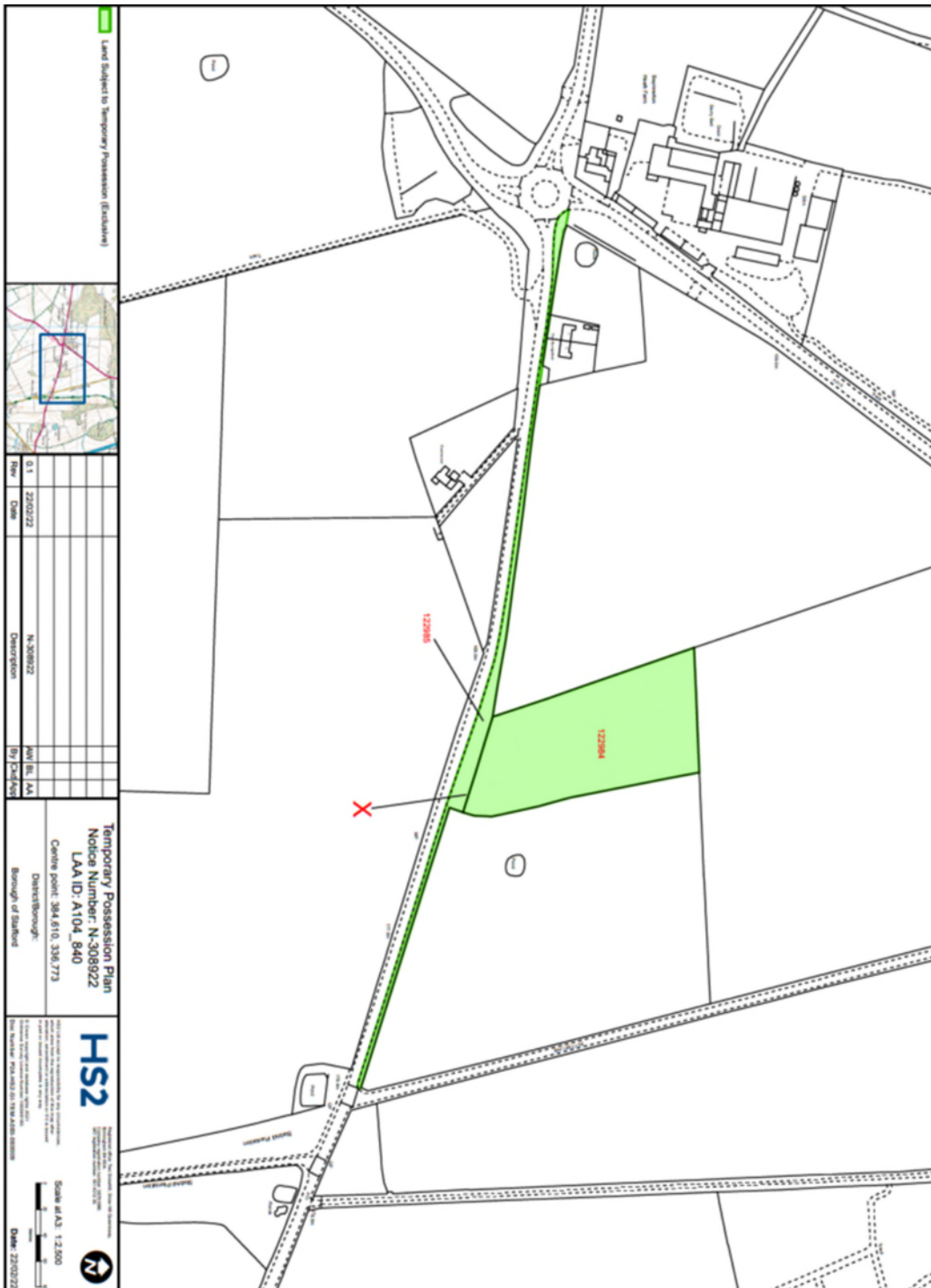
- and -

PERSONS UNKNOWN AND OTHERS

Defendants

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

ORIG-B-383



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.

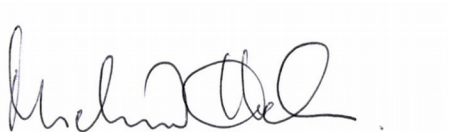
If you would like to seek impartial advice regarding the temporary possession of your land and/or property for the project, you can contact the Royal Institution of Chartered Surveyors' helpline on 02476 868 555. They will put you in touch with surveyors in your area, who can provide up to 30 minutes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

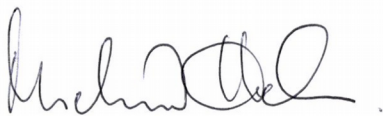
Please provide any information that you may have in relation to the following issues:

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, e.g. <i>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)

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

		interfered with by the acquisition or temporary possession, go to SECTION E. If your land is subject to temporary possession, go to SECTION F.
SECTION A – FREEHOLD		
7	If you own the freehold interest	Please provide your registered title number (if known)..... 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. Please include information regarding unregistered land and provide plan(s).
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	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. Please confirm the amount of any rent deposit you hold £..... Please confirm the amount of rent currently paid to you £..... 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). If there is no lease or agreement in writing, please provide a plan showing the area occupied by any third party and state: The name of the occupier and contact address (if different to above): Whether or not the land is shared with any other party; if so please provide contact details: 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 freeholder and any occupier, other than through whatever arrangement that you have made, please provide details of the relationship etc
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	i) Existing exceptions of mines and minerals and any other exceptions 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). iii) Any public or private rights of way or any other public or private rights or privileges affecting the property iv) Existing covenants and restrictions affecting the property v) Corn Rent payable vi) Liability to repair the Chancel of any Church vii) Land drainage rates payable viii) Yearly rent charges and outgoings

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 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 <i>(Select which applies)</i></p> <p>If 'No', can the claimant partially recover VAT: <input type="checkbox"/> Yes / <input type="checkbox"/> No <i>(Select which applies)</i></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 <i>(Select which applies)</i></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 style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding-left: 20px;">For the value of the claimant's interest</td> <td style="text-align: right; padding-right: 20px;">£</td> </tr> <tr> <td style="padding-left: 20px;">For severance/injurious affection of other land of the claimant</td> <td style="text-align: right; padding-right: 20px;">£</td> </tr> <tr> <td style="padding-left: 20px;">For disturbance (Please provide the detail requested at 22)</td> <td style="text-align: right; padding-right: 20px;">£</td> </tr> <tr> <td style="padding-left: 20px;">For easements etc</td> <td style="text-align: right; padding-right: 20px;">£</td> </tr> <tr> <td style="padding-left: 20px;">Home loss payment</td> <td style="text-align: right; padding-right: 20px;">£</td> </tr> <tr> <td style="padding-left: 20px;">Basic loss payment</td> <td style="text-align: right; padding-right: 20px;">£</td> </tr> <tr> <td style="padding-left: 20px;">Occupier loss payment</td> <td style="text-align: right; padding-right: 20px;">£</td> </tr> <tr> <td style="padding-left: 20px;">Total gross claim</td> <td style="text-align: right; padding-right: 20px;">£</td> </tr> <tr> <td style="padding-left: 20px;">What sum, if any, is to be deducted for betterment</td> <td style="text-align: right; padding-right: 20px;">£</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	£
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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	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: Copies of any available estimates/quotations/costs already incurred or to be incurred.
SECTION F – TEMPORARY POSSESSION	
25	If an amount for loss or injury/damage caused by temporary possession has been or is to be claimed, please provide: Copies of any available estimates/quotations/costs already incurred or to be incurred.

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)*.....

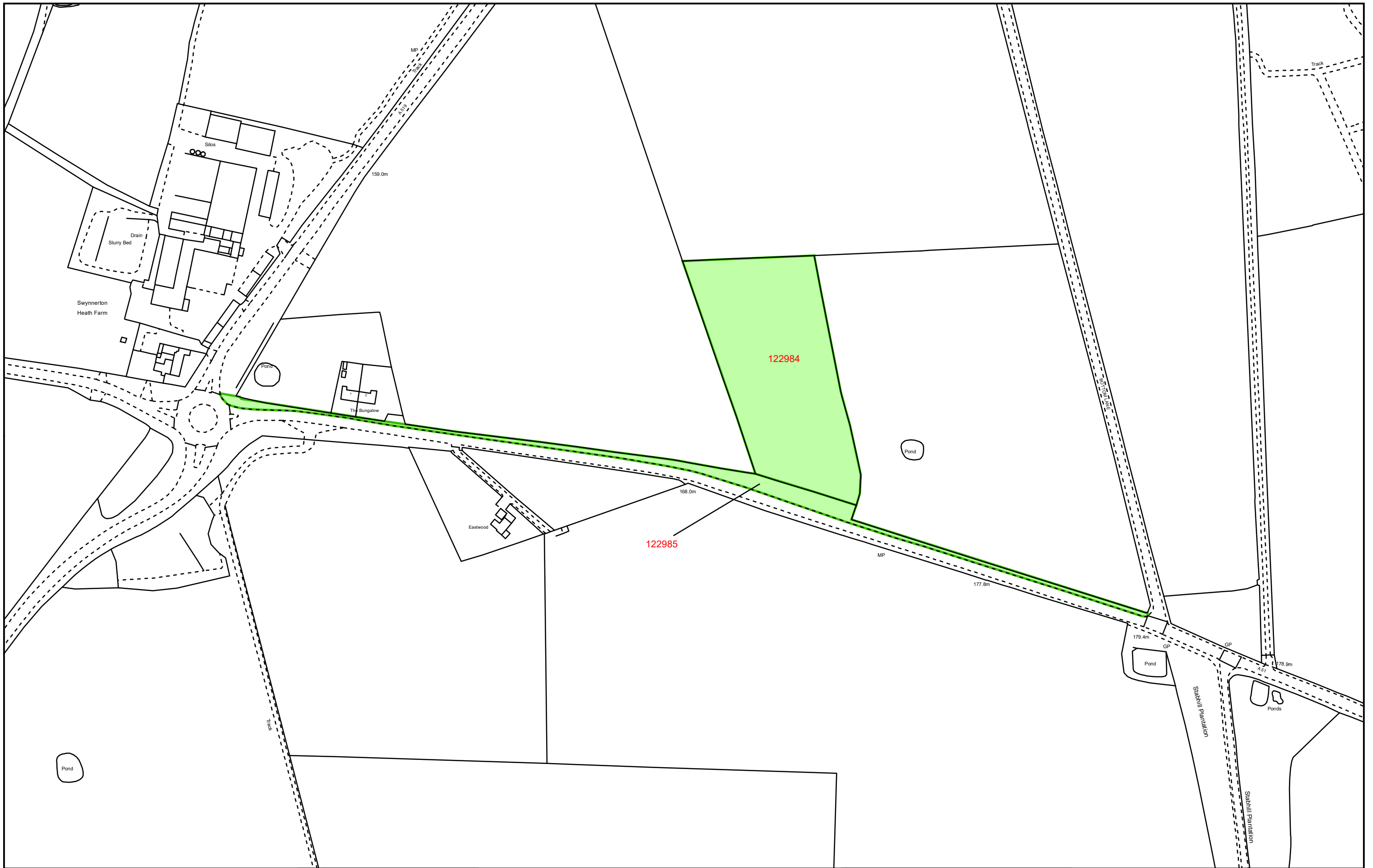
Please note:


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

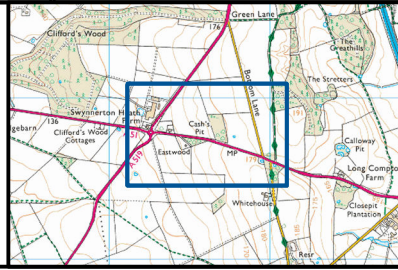
<https://www.hs2.org.uk/documents/collections/claiming-compensation-if-you-receive-a-notice/>

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)



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

Temporary Possession Plan
 Notice Number: N-308922
 LAA ID: A104_840
 Centre point: 384,610, 336,773
 District/Borough:
 Borough of Stafford

HS2

Registered office: Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA
 Company registration number: 06791686.
 VAT registration number: 181 4312 30.

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

Scale at A3: 1:2,500

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

ORIG-B-400

HS2

Compulsory purchase

Phase 2a



www.hs2.org.uk

CS1513

ORIG-B-401

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)

Veillez 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 விரும்பப்பட்டால், எங்களை தொடர்புகொள்ளவும்.

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

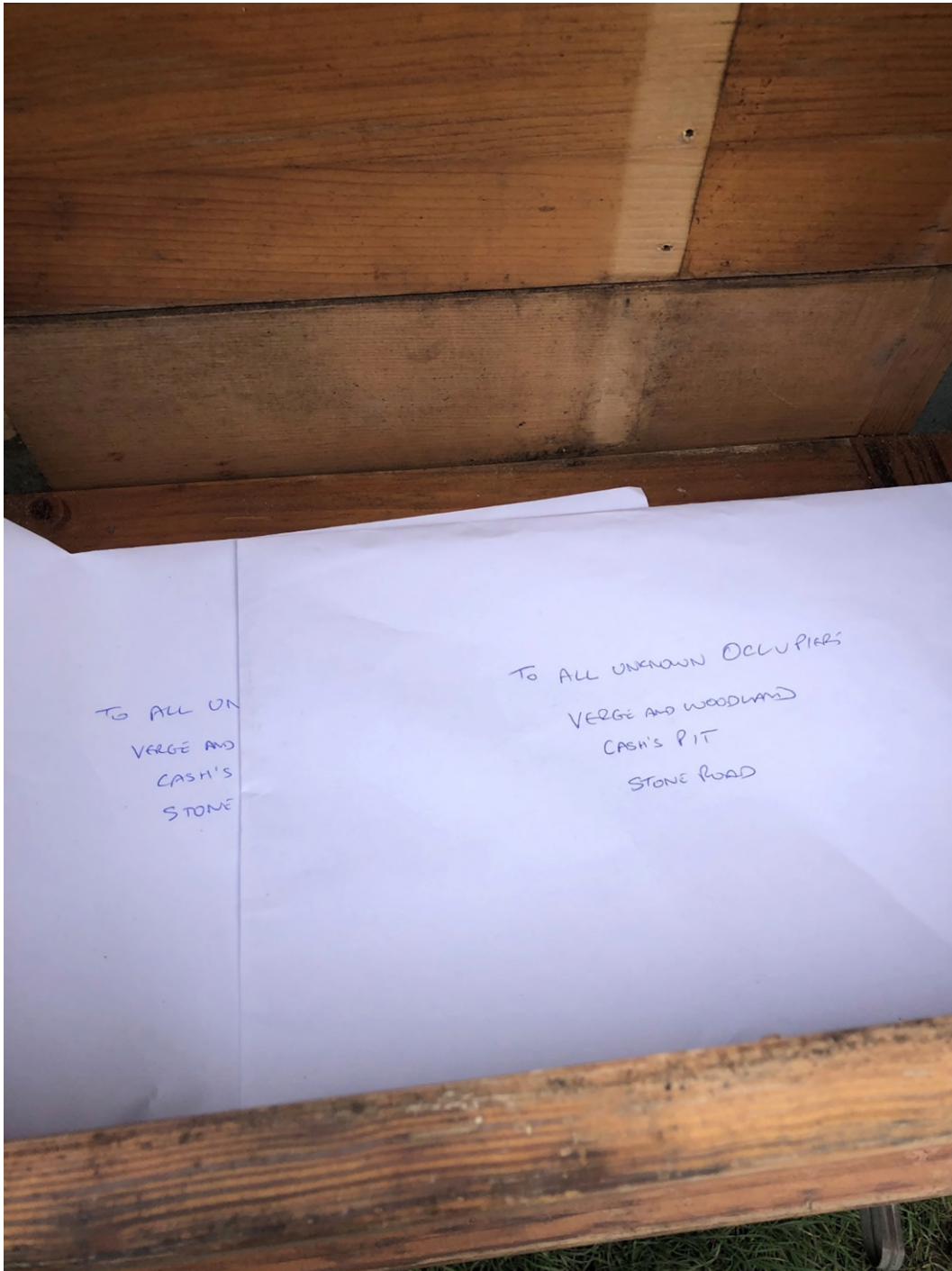
Birmingham B4 6GA

Freephone: 08081 434 434

Email: HS2enquiries@hs2.org.uk

CS1513

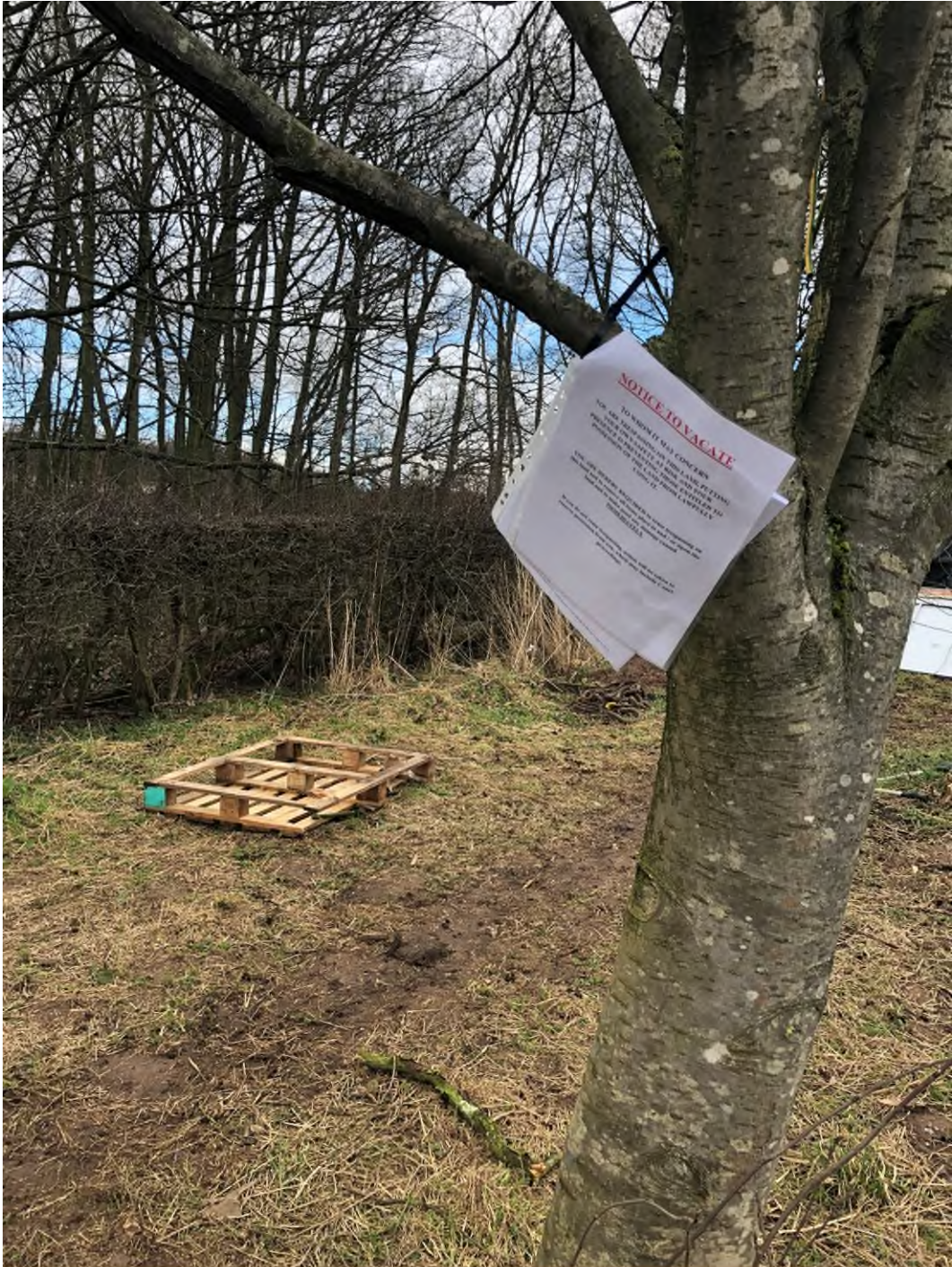
www.hs2.org.uk















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](#) will help us to improve it.

jacqueline.stables@arup.com ([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 \(/works/TA051FEW-BLUEBELLWOODS-A/on-site/start\)](/works/TA051FEW-BLUEBELLWOODS-A/on-site/start)

[Request change \(/works/TA051FEW-BLUEBELLWOODS-A/permits/TA051FEW-BLUEBELLWOODS-A-01/change-request\)](/works/TA051FEW-BLUEBELLWOODS-A/permits/TA051FEW-BLUEBELLWOODS-A-01/change-request)

[Go to works record to add comments or files \(/works/TA051FEW-BLUEBELLWOODS-A/#file_header\)](/works/TA051FEW-BLUEBELLWOODS-A/#file_header)

[Go to works history \(/works/TA051FEW-BLUEBELLWOODS-A/history\)](/works/TA051FEW-BLUEBELLWOODS-A/history)

[Cancel application \(/works/TA051FEW-BLUEBELLWOODS-A/permits/TA051FEW-BLUEBELLWOODS-A-01/cancel\)](/works/TA051FEW-BLUEBELLWOODS-A/permits/TA051FEW-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 \(/files/3923199\)](/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.

ORIG-B-425



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.



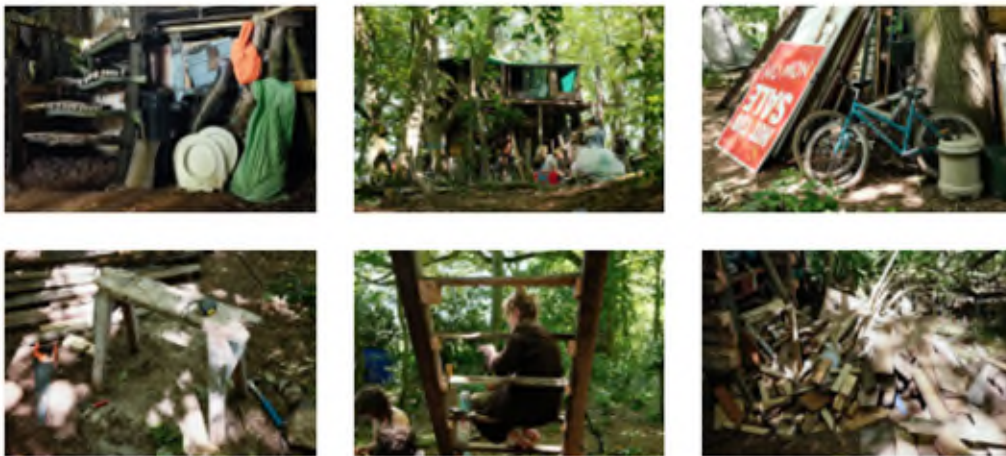
The proposed HS2 route will take the railway line straight through this wood, destroying the habitat of many wild animals, and it's not just these activists that are unhappy with it. Baron Francis Fitzherbert, Lord Stafford himself, has also been campaigning against HS2 trying to stop them from cutting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

ORIG-B-435



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**

ORIG-B-445

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

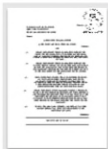


[1. Claim Form HS2 & Or v PU & Ors 25.03.2022](#)

PDF, 1.01 MB, 4 pages

This file may not be suitable for users of assistive technology.

▶ [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

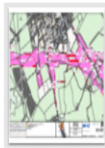


[7. HS2 Land Plans - Part 1](#)

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 Schdl15](#)

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

HS2 protest - activists refuse to leave woodlands following eviction deadline

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

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

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

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

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

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

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

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



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

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

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

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

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



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

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

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

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

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

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



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

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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=IwAR0J5hYFWcZC8BU2eEgtgxfu7cmND8iEEqkuQ7dIL1WOitSEIET3rxDJ9E>

HS2 protesters waiting for eviction to begin after papers served

🕒 6 days ago



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

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

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

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

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

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

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

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

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

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

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

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

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



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

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


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

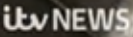

"We're not deliberately putting ourselves in the way of danger, but we will put ourselves in a position where we think we can protect a tree or a piece of land."

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

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

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

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


 

HS2 Rebellion
March 25 at 6:53 AM · 🌐

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

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

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

 ITV Central News 6pm Thursday 24 March

Screenshots from ITV News report showing tunnels:



ORIG-B-461







Screenshots from ITV News report showing satellite camp:



Screen shot of D6:



Screen shot of D7:





Bluebell Woods Protection Camp

March 26 at 12:16 PM · 🌐



Bluebells last stand!

We could be evicted any minute now!

Eviction is becoming more and more imminent!

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

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





Bluebell Woods Protection Camp



March 29 at 9:00 PM · 🌐

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

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

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





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



Numbers needed



👍❤️👍 21

14 Comments 17 Shares

👍 Like

💬 Comment

➦ Share

Most relevant ▾



Write a comment...



Press Enter to post.



Claire Moyle · 2:22
They're trying to aggravate ...

Like Reply 6d



Samantha Lewin · 4:25
Wish i could come down, they wouldnt catch me 🙏🙏🙏 ...

Like Reply 6d

↳ Angela McMaster replied · 1 Reply



Andy Wildman · 2:38
No wonder this is costing us billions 😞 ...

Like Reply 6d



Hayley Marie · 3:13
looks windy 🌬️ 😬 ...

Like Reply 6d



Hayley Marie · 1:13
what the hell is the machine for? ...

Like Reply 6d

↳ Andy Wildman replied · 1 Reply



Jane Hurd Cahane · 0:24
Wish I could join you but it's a bit far ...

Like Reply 6d



Groovella Deville · 1:09
Is that main camp? ...

Like Reply 6d

Hazel Ball · 0:00
BB 2 ...

Like Reply 6d



Write a reply...



Press Enter to post.



Lillie Olive Gypsy · 4:18
Too far for me too. Sorry drew for not being there. ...

Like Reply 5d

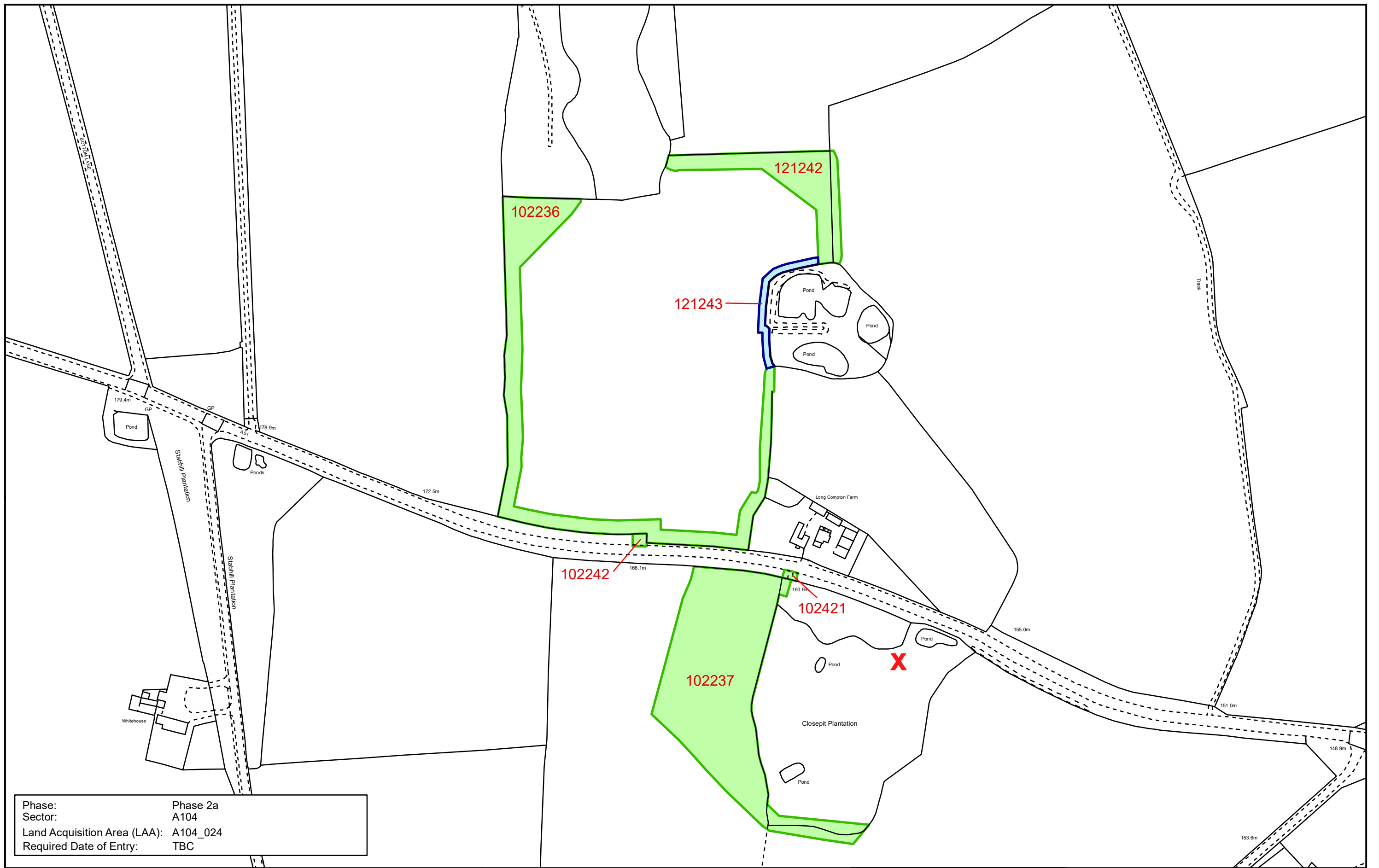


Drew Robson was live.
March 25 at 11:21 AM · 🌐



Numbers would be amazing!





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

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

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

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

HS2
 Registered office: Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.
 Company registration number: 06791686.
 VAT registration number: 181 4312 30.

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

Scale at A3: 1:2,500

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

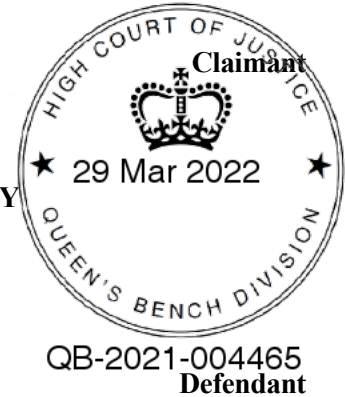
ORIG-B-471

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

(1) HIGH SPEED TWO (HS2) LIMITED

and

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



FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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

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

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

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

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

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

IT IS ORDERED THAT:

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

UNDERTAKINGS TO THE COURT

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

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

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

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

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

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

**Dated 28 March 2022
Mr Justice Linden**

BY THE COURT

IN THE HIGH COURT OF JUSTICE.
QUEENS BENCH DIVISION

CLAIM No: QB-2022-000904

Before: Mr. Justice Butcher

On: 21 March 2022

BETWEEN

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



QB-2022-000904
Sub Event ID: 3

-and-

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

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

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

Defendants

ORDER

PENAL NOTICE

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

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING
WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF
THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE
IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED**

IMPORTANT NOTICE TO THE DEFENDANTS

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

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

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

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

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

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

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

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

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

IT IS ORDERED THAT:

1. For the purposes of this Order,

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

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

Injunction in force

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

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

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

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

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

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

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

Service

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

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

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

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

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

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

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

Further directions

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

Communications with the Claimants

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

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

Dated: 21 March 2022