

On behalf of: Applicants/Claimants
J.Groves
2nd statement of witness
Exhibits: JG2
Date: 28.02.2024

Claim No. QB-2022-BHM-000044

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

Between:

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

Claimants

-and-

- (1) NOT USED**
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES**
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS**
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS**
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)**

AND 60 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants

EXHIBIT JG2

TO THE

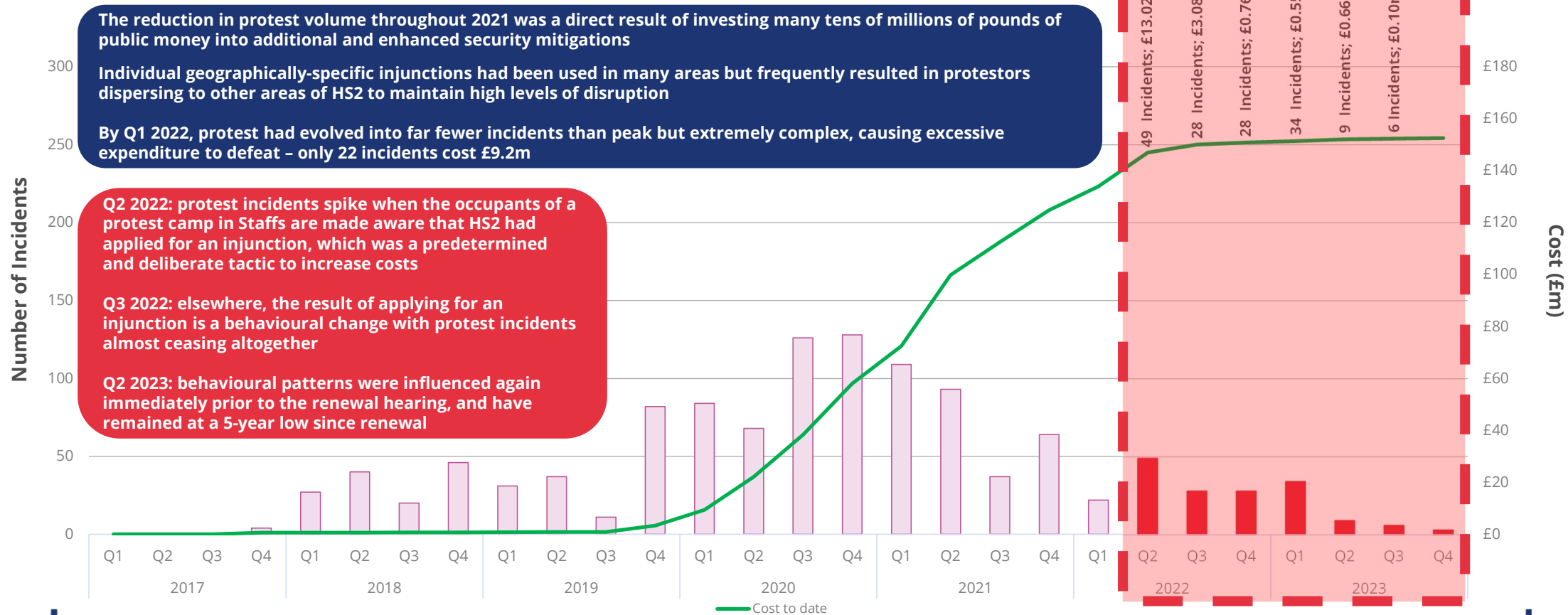
SECOND WITNESS STATEMENT OF JOHN GROVES

Statistical Impact of the Injunction

Cumulative Cost to Date
(November 2023): £152.56m

Total number of incidents to Date
(November 2023): 1186

Incidents and Expenditure Q1 2017 to Q4 2023



Note: All costs are current prices at time of impact. The overall anticipated cumulative forecast (at Q4 2029) based upon current projections is £152m (low range) and £229m (high range). Within the Costs to Date, 67% are actuals and 33% are forecast. This is why there are variances (up and down) each month on the cost to date (green).

Forecasted Costs without RWI

Cumulative Cost to Date (November 2023): £152.56m

Total number of incidents to Date (November 2023): 1186

Forecasted Financial Impact of no Route-wide Injunction

A logical place to study as a window into what post-RWI incident levels could be is between Q4 2019 and Q2 2021

Q4 2019 saw the arrival of full-time, experienced out-of-area protestors adept at frustrating police and victim organisations

2020 was a period of heavy recruitment and training for HS2 Rebellion, with an increase in lock-on protests and camps being set up

A period of recruitment and training would need to be undertaken to reach 2020 levels, but it would be far quicker

The availability of trained and experienced leaders is far better, with former HS2 Rebellion protestors conducting actions elsewhere

It is acknowledged that the Public Order Act 2023 includes infrastructure construction, but it has been proven through recent convictions that committed protestors are content to be sentenced to prison for their beliefs

It is assessed that a plausible post-RWI scenario would see at least £29 million additional security costs added by the end of Q4

It is plausible that significant second order costs would be incurred as a result of delay to works, but not possible to forecast a figure for those costs

This scenario is based on immediate momentum, therefore the same financial impact could be plausible over a longer period, possibly off-set by 6 months

