

Claim No.

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

BETWEEN

UNIPER UK LIMITED

Claimant

- and -

(1) JOSHUA BARTER

(2) SAM WILLIAMS

(3) IAN JOHNSON

(4) LUKE BADHAREE

**(5) PERSONS UNKNOWN WHO ENTER OR REMAIN UPON ANY
PART OF THE LAND AT THE RATCLIFFE-ON-SOAR POWER
STATION (AS DEFINED IN PARA. 2 BELOW) WITHOUT THE
CONSENT OF THE CLAIMANT**

Defendants

PARTICULARS OF CLAIM

1. The Claimant is registered at HM Land Registry under title number NT422266 as the freehold owner of the land shown edged red on the title plan appended hereto and labelled “Plan 1” (“the Freehold”).

2. The Freehold in part comprises the site of a coal-fired power station which was closed on 30 September 2024 and is currently undergoing an approximately two-year period of decommissioning. The extent of the power station site is shown on “Plan 2” appended hereto edged red, but excluding the areas shaded blue (“the Land”). The Claimant is entitled to possession of the Land.

3. The areas shown edged and shaded in blue on Plan 2 comprise the site of an electricity substation which is subject to a long lease to National Grid Electricity Transmission Plc. The Claimant is not entitled to possession of these areas and does not apply for any order in respect of them.

Unauthorised Encampments

4. In the evening of 25 April 2025, a group of more than 25 travellers forced entry onto the Land with caravans and other vehicles (“the Traveller Group”). The Traveller Group established an unauthorised camp and remained on the Land until 28 April 2025.

5. In entering and remaining on the Land without the consent of the Claimant, the Traveller Group was trespassing on the Land.

6. Whilst present on the Land, the Traveller Group, or some of their number:

- 6.1 were aggressive to security personnel employed by the Claimant and physically assaulted one security guard;
- 6.2 threatened more serious violence to security personnel if their access to the Land was hindered;
- 6.3 forced entry into and caused substantial damage to buildings, other structures and machinery on the Land;
- 6.4 removed seven transformers from the ground, stripped and removed large quantities of copper wire and damaged other cables and guttering;

6.5 operated vehicles and heavy machinery on the Land belonging to the Claimant (having removed the keys to the vehicles from the Claimant's offices);

6.6 caused substantial damage to vehicles belonging to the Claimant.

7. By reason of the matters above, the Traveller Group is liable to the Claimant in nuisance and conversion and / or trespass to the Claimant's goods by causing damage to the Claimant's property.

8. On 26 June 2025, a group of travellers attempted to force entry onto the Land, with caravans and other vehicles ("the Second Traveller Group"). The Claimant does not know whether some or all of the Second Traveller Group were part of the Traveller Group who entered the Land on 25 April 2025 as described above.

9. As a result of increased security measures implemented by the Claimant following the incursion on 25 April 2025 by the First Traveller Group, the Second Traveller Group was unable to enter the Site through the gates without damaging them. They therefore used cutting equipment to force open the gates and break the locks. They also used vehicles with chains and ropes to open the gates and remove the concrete vehicle mitigation blocks installed by the Claimant as a further security measure.

10. On this occasion, a number of police officers attended at the Land while the Second Traveller Group was attempting to enter and the Second Traveller Group abandoned their attempt to gain entry to the Land.

11. This group of travellers caused substantial damage to the access barriers, the vehicle mitigation blocks and gates.

12. By reason of the matters set out above, the Second Traveller Group is liable to the Claimant in trespass, nuisance and for conversion and / or trespass to the Claimant's goods by causing damage to the Claimant's property.

Urban Explorers

13. In April 2024, five individuals, one of whom was the First Defendant, gained access to the Land without the consent of the Claimant and climbed one of the chimney stacks on the Land, the height of which is 198m. These individuals were trespassing on the Land and engaging in the activity known as "urban exploration" whereby so-called "urban explorers" typically trespass for the purpose of climbing tall buildings, structures or equipment and post photographs, videos and messages of their exploits on social media.

14. Since April 2024, the Claimant has seen footage on social media of the following incidents of trespass on the Land:

- 14.1 on the Facebook profile page of the Second Defendant, an image of the First Defendant and the Second Defendant on top of the main chimney stack on the Land. The Claimant does not know when this photograph was taken;
- 14.2 in a Facebook post on 25 March 2025, the First Defendant posted a video (which is not publicly available and which the Claimant has therefore been unable to view) which was accompanied by a textual description of persons unknown entering and climbing structures on the Land;
- 14.3 in a video posted on the Facebook page of the First Defendant on 13 April 2025, three urban explorers can be seen trespassing on the Land, including the Second and the Third Defendants;

- 14.4 in another post on the Facebook page of the First Defendant on 13 April 2025, a photograph shows the First Defendant in the turbine hall on the Land. A comment on this post, stated to have been made by the Third Defendant, refers to the Third Defendant having also been present on the Land on the same occasion as the First Defendant;
 - 14.5 a further photograph posted by the First Defendant on Facebook on 12 June 2025 shows the First Defendant on the Land at the top of one of the chimney stacks;
 - 14.6 on 1 July 2025, the Fourth Defendant posted a photograph on his Facebook page which showed the Fourth Defendant and another individual (whose identity is not known to the Claimant) on the Land with a caption which read “*Ratcliffe – some awesome times spent in here*”;
 - 14.7 the First to Fourth Defendants’ Facebook pages also contain posts which contain photographs or text showing that they have entered other power stations for “urban exploration”;
 - 14.8 other social media postings indicate that other unidentified urban explorers have trespassed or would like to trespass on the Land for the purpose of urban exploration activity.
15. By reason of the matters set out in paragraphs 13 and 14, above, the Defendants are liable to the Claimant in trespass and nuisance.

Remedies Sought

16. Unless restrained by injunction, there is a real and immediate risk that persons unknown, being members of the traveller community, will wrongfully enter the Land for the purpose of setting up an encampment and / or causing damage to the Land or the buildings or other structures on the Land or the Claimant's equipment and machinery therein.

17. Further, unless restrained by injunction, there is a real and immediate risk that the First to Fourth Defendant and persons unknown being so-called "urban explorers" who intend to access the Land without the Claimant's permission for the purpose of "urban exploration", will continue to do so, thereby trespassing on the Land and risking the safety of themselves and others who enter the Land and damage to the Claimant's property.

18. Accordingly, the Claimant seeks the following injunctive relief, subject to periodic review by the Court on an application by the Claimant at intervals not exceeding 12 months or such period as determined by the Court:

18.1 an order restraining the Defendants from:

- (a) entering onto any part of the Land without the consent of the Claimant;
- (b) climbing any structures (whether temporary or permanent) on the Land;
- (c) climbing or otherwise tampering with any equipment or machinery on the Land;
- (d) forcing entry into any buildings or other structures on the Land.

18.2 an order further restraining the Fifth Defendant from:


- (a) bringing vehicles onto any part of the Land;
- (b) setting up an unauthorised encampment on any part of the Land;
- (c) damaging any buildings, structures or equipment on any part of the Land;
- (d) entering and driving or otherwise using and / or damaging any vehicles present on the Land (apart from vehicles brought on to the Land by the Fifth Defendant);
- (e) removing any goods or materials from the Land.

AND the Claimant claims:

- (1) The injunctions set out in paragraph 18 above.
- (2) Further or other relief.
- (3) Costs.

ADAM ROSENTHAL KC

The Claimant believes that the facts stated in these Particulars of Claim are true. The Claimant understands 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.

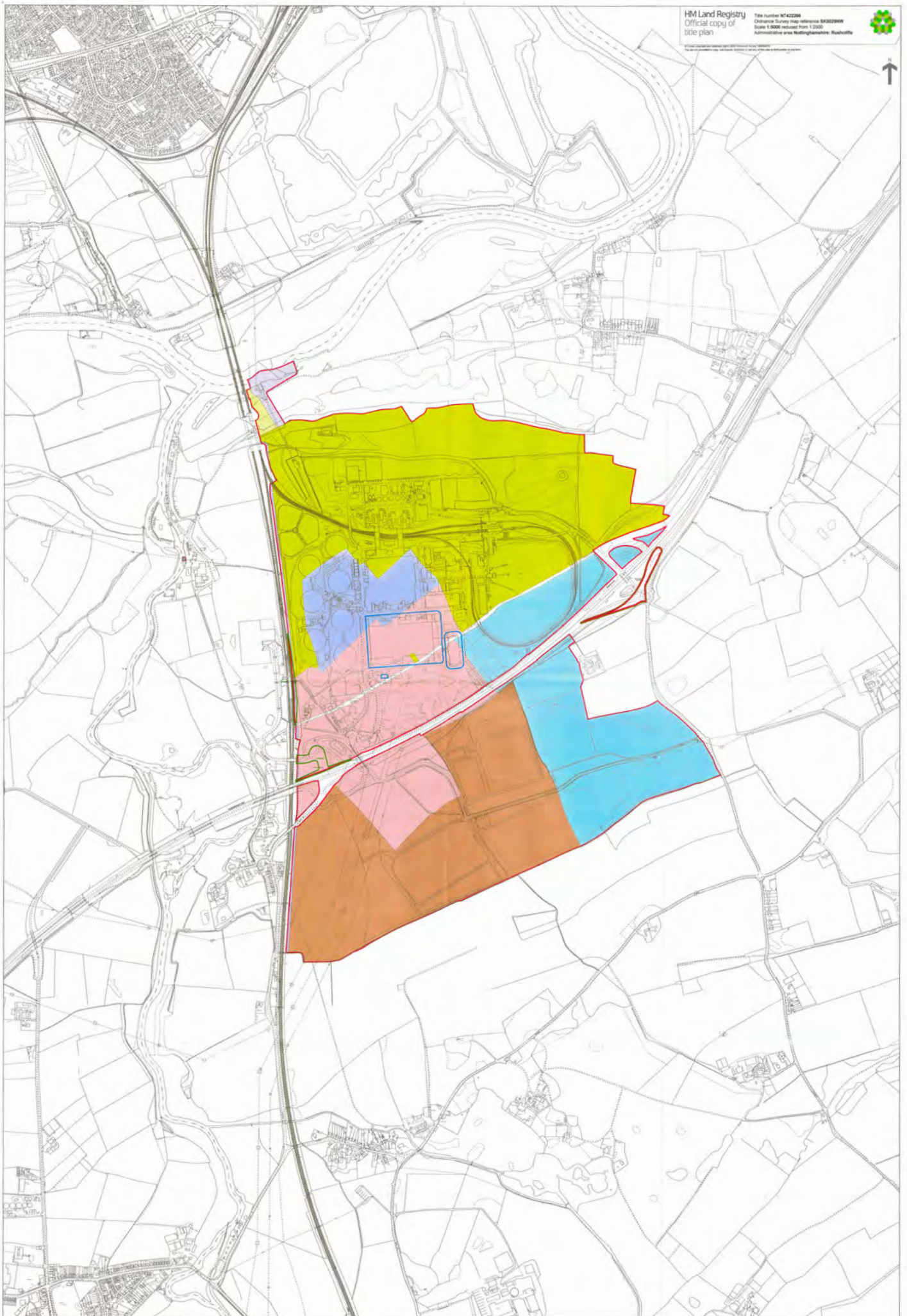
Signed:  Signed by: Nigel Walker
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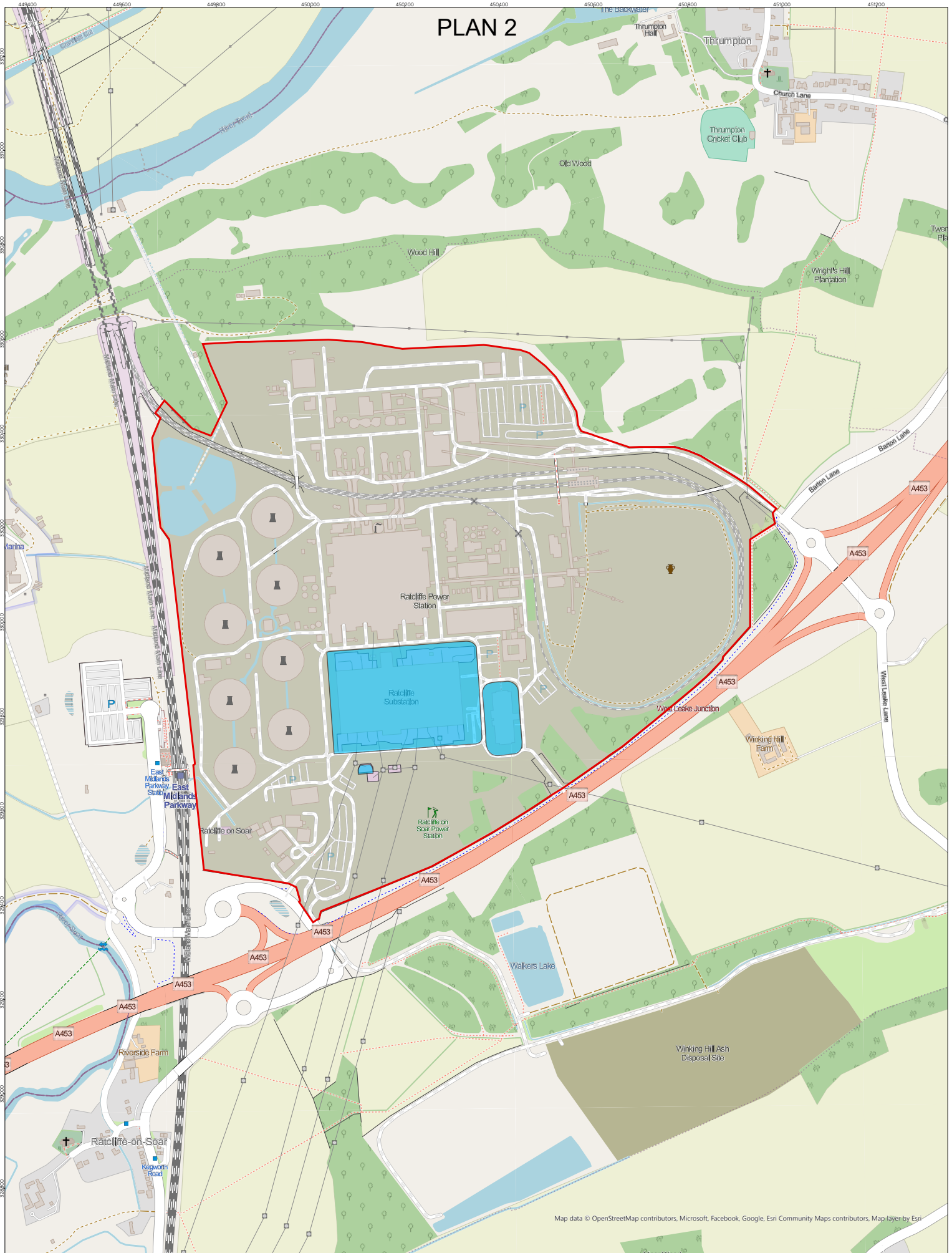
UNIPER UK LIMITED

Date: 21 July 2025

PLAN 1



PLAN 2



Map data © OpenStreetMap contributors, Microsoft, Facebook, Google, Esri Community Maps contributors, Map layer by Esri

	OVERVIEW WINDOW	REVISION: A	FP: 105170-005
	Long Eaton	CLIENT:	
		SCHEME: Ratcliffe Power Station	
		TITLE: Location Plan	
		SCALE: 1:5,000 @ A2	
		DATE: 16/07/2025	

- LEGEND:
- Injunction Area
 - National Grid Substation Lease

**fisher
german**



DRAWING REF:
UNIPER-2025-07-EP-LP-RATCLIFFE
POWER STATION

UNIPER UK LIMITED

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PARTICULARS OF CLAIM

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Solicitors for the Claimant