

**IN THE HIGH COURT OF JUSTICE**

**Claim no. [            ]**

**BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES**

**PROPERTY TRUSTS AND PROBATE LIST (ChD)**

**B E T W E E N :**

**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 THE  
PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT**

**Defendants**

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**WITNESS STATEMENT OF ANDREW JAMES SKELTON**

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I, **ANDREW JAMES SKELTON**, of Uniper UK Limited, Compton House 2300 The Crescent, Birmingham Business Park, Birmingham, England, B37 7YE **WILL SAY** as follows:

1. I am the Decommission Support Team Leader and Authorisation Officer for the Ratcliffe-on-Soar power station near Nottingham (the "**Power Station**") for Uniper Energy. I was formerly a shift team leader when the Power Station was operating. In my current role I manage former shift operations staff in supporting various teams in their activities and manage and ensure compliance with the Claimant's safety rules.
2. I make this witness statement in support of the Claimant's application for an injunction to prevent travellers and so-called 'urban explorers' from trespassing

and/or causing a private nuisance at the Power Station. I am duly authorised to make this statement on the Claimant's behalf.

3. I have read the Particulars of Claim and final drafts of the witness statements of Stephen Foster Close and Graeme James Robertson for the Claimant.
4. Save where I indicate to the contrary, the facts and matters within this statement are within my own knowledge and are true. Where they are not within my knowledge, I have identified the source of the information and believe such facts and matters to be true.
5. This witness statement has been prepared by an exchange of emails and a call with solicitors for the Claimant.

### **Traveller incursion in April 2025**

6. On the evening of Friday 25 April 2025, a group of travellers forced entry to the Power Station site with vehicles and caravans. They remained on site until the afternoon of Monday 28 April 2025, during which time they caused significant damage to the Power Station site. I was appointed by the Power Station Site Manager to act as Incident Controller throughout the incursion and was present on site periodically between 25 – 28 April 2025, as well as liaising with the Site Manager and other employees of the Claimant in relation to developments on site.
7. The group arrived through the gate to the east of the Power Station site, off Barton Lane, shortly before 17:00 on 25 April 2025. From discussing the group's arrival with site security on Sunday 27 April 2025 and reviewing security footage showing their arrival whilst I was on-site, I understand that a group of travellers physically assaulted the security guard manning the gatehouse and forced him to provide them access to the barrier control panel. Once in possession of this control panel, the travellers opened the barriers and directed their convoy of vehicles into the site, parking near to the Flue-Gas Desulfurization plant ("**FGD**").
8. I understand through discussions with others within the Claimant that on-site security reported the incursion shortly after 17:00. I personally became aware of the incident when I received a call from the gatehouse at around 21:15 on Friday 25 April 2025 and called them back at around 21:45. I was informed of the incursion by the traveller group and that there were 'W1' and 'Ovation' alarms. A W1 alarm is an environmental alarm that measures pH, turbidity and free chlorine levels in the power station discharge water, and an Ovation alarm is a digital control scheme that

runs the Power Station alarm schemes. The alarms would have been triggered because the power supply to the instruments had been switched off.

9. On Saturday 26 April 2025, I engaged in calls and meetings with the Power Station Site Manager and other employees of the Claimant regarding the ongoing incursion. I recall that there was mention of taking legal measures to remove the travellers, including the service of an eviction notice.
10. I attended the site on the afternoon of Sunday 27 April 2025, arriving at around 14:00. I discussed with the security guards on duty their understanding that there were approximately 20 vehicles and over 25 individuals on site.
11. Later that afternoon, around 16:00, I observed via the CCTV system that a group of around eight men were holding a discussion, following which they split up. I then observed a small Mercedes car driving across the site to the Coal Plant area, parking out of view of the CCTV cameras. The Coal Plant is the area of site where the coal was stored and delivered to the Power Station from either the stockpile or railway discharge hoppers when the Power Station was in operation. The area has uneven surfaces, underground hoppers and service ducts, conveyors and a "yellow plant" storage area for items such as excavators and loading shovels. There are also switchrooms with live electrical supplies.
12. At around 17:20, I observed through the CCTV system that a Hyundai 360 excavator (a piece of machinery that I understand to weigh in excess of 35 tons) belonging to the Claimant was moving in front of the Coal Plant control building. One of the security guards called the police and reported this. They were given a crime reference number and told a response car would be sent when available.
13. Through the CCTV system I then noted movement in the Ammonia Plant, with at least two individuals moving around and carrying objects. The Ammonia Plant is a delivery and storage area for anhydrous ammonia. Anhydrous ammonia is a chemical that will sublime (change from a solid to a vapourised or gaseous state) and increase in volume if released uncontrolled into the atmosphere. If anyone comes into contact with the liquid or ammonia vapour, it can cause chemical burns and irritation to skin and eyes, breathing difficulties and burning of the lungs if inhaled. The Ammonia Plant is also a 'DSEAR zone' (subject to the Dangerous Substances and Explosive Atmospheres Regulations 2002), as ammonia vapour is explosive and will easily combust if an ignition source is available. I observed these individuals moving to the edge of the compound near the high voltage (HV) cables.

I could clearly see through the CCTV system that they were cutting and pulling lengths of cable.

14. By 18:00 the excavator was near the Ammonia Plant and had been stationary for a period of time. I left the site around 18:30.
15. I attended site on the morning of Monday 28 April 2025, around 06:00. A dog handler was present and I had a discussion with him about what they had seen and heard overnight. They informed me that from around 20:00 the previous night there was a large amount of movement on site along with the sound of scraping metal, vehicle engines and forceful entry to buildings. I recall that it was described to me as having been "*carnage*".
16. The Power Station Site Manager had instructed two enforcement companies, Devon Investigations Ltd (also known as County Investigations) and Constant & Co, whom I met on site at around 08:40. I discussed the status of the site with them and they inspected some CCTV footage. Upon showing them a photo of four of the individuals on site, the Constant & Co agents recognised them and relayed that they had evicted them from a site in Utttoxeter the previous week.
17. Shortly afterwards three police cars and a police van arrived. After a briefing with security staff, police officers and enforcement officers entered the site and approached the traveller camp. As a result of this discussion, over the next two hours four caravans left the site.
18. At around 13:00, several cars and vans entered the site and proceeded to the encampment of caravans. The caravans were attached to the vehicles and the group began to leave. Approximately thirteen caravans left the site around 14:00.
19. Shortly after 15:00 I entered the site and proceeded to carry out some safety checks, first in the Engineering Block and then at the GSY switchboard. This is a particular 3.3kV switchboard located in the northwest corner of the boiler house which comprises a series of high voltage circuit breakers coupled together that start and stop high voltage motors. Whilst walking around the site I noticed a Ford Fiesta van from the Coal Plant with a damaged nearside front wheel; large amounts of litter scattered on the ground and some open doors to buildings.
20. I then proceeded across the FGD bridge and onto the FGD site itself. I saw that the cable trays along the road 21 (one of the roads off site) pipe-racking had been destroyed and there were numerous vehicles that had been damaged and


abandoned. Pipe-racking is a structure that carries pipework and cables between areas of the Power Stations. As I walked down road 21, I saw the Unit 4 transformers overturned and missing their cores. I entered the common services switchroom and noted that some of the doors were damaged and some locks were missing.

21. As I left the switchroom, I noted the spare transformer located on the Gypsum Store wall had been dragged into the road. Upon walking towards the spare transformer I also noted CSA and CSB transformers again overturned and the cores missing. "CSA" and "CSB" are names of 11kV switchboards and the associated transformers are denoted with the same reference.
22. On walking back towards the Engineering Office I inspected the FGD Office block, where I saw devastation and evidence of looting. As I left the building a colleague informed me that there were two more locations to visit, REU stores and area 51, both had seen activity overnight. At the REU stores another two transformers had been opened and their cores removed. At Area 51 the 360 excavator had been used to split the copper windings from the laminations.
23. I walked around these two sites and returned to the Engineering block office. Following a discussion with members of the Electrical Team, I got changed and left site 18:45 that night.

### **Statement of Truth**

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

**SIGNED**

Signed by:  
  
490B46F487F84CE.....

**ANDREW JAMES SKELTON**

**DATED**

21 July 2025  
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